Green Finance Framework

November 2025

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About NCC

NCC is one of the leading construction companies in the Nordics. Based on its expertise in managing complex construction processes, NCC contributes to the positive impact of construction for its customers and society. Operations include building and infrastructure project contracting, asphalt and stone materials production, and commercial property development. Our strength is a proactive approach to take the customer through the construction process, for a positive result for all stakeholders. As a knowledge-based company aiming to be data-informed and provide expertise, NCC constructs, maintains and develops the built environment with a focus on how materials, methods and processes can reduce the burden on the environment and make a positive contribution to society.

NCC have operations in Sweden, Norway, Denmark and Finland. In 2024, NCC had sales of about SEK 62 bn and approximately 11,800 employees. For further information about NCC, please visit ncc.com.

NCC's Green Finance Framework is driving sustainable development through strategic investments. As part of NCC's long-term commitment to sustainable development, NCC has actively issued Green Bonds to finance projects that contribute to climate resilience and environmental performance. At the same time, Green Bonds meet the capital market's demand for sustainable investment alternatives and provide the opportunity to contribute to climate transition.

Our approach to Sustainability

NCC aims to be an empowering partner and, through cooperation and dialogue with customers, various societal players, and other stakeholder groups, enable the construction of healthy, safe, and secure environments. Through property development, NCC serves as a support to urban planning in issues such as the health and wellbeing of people in both office buildings and their surroundings. NCC provides expertise and extensive digital information about processes and products to support decisions based on facts and high-quality data, thus contributing to a positive change now, and in the future.

NCC takes a long-term responsibility and strives to reduce emissions from the entire value chain. The company focuses on increasing energy efficiency, phasing out fossil energy sources and enabling adaptation to climate change. Furthermore, NCC is committed to increasing the use of circular and recycled materials, minimizing and responsibly managing waste, and designing and building to facilitate recycling and reuse. NCC also strives for responsible sourcing of materials and management of natural resources in ways that minimize the negative effects on biodiversity and ecosystems.

NCC seeks to ensure a safe and healthy work environment for all employees, with the aim of reducing all types of accidents in accordance with NCC's vision zero, but with an increased focus on eliminating serious incidents and fatal accidents. NCC shall also maintain the highest ethical standards and conduct operations while ensuring sound working conditions. Through NCC's business areas, various activities are conducted to lower the climate impact of the Group's own manufacturing of materials and production as well as of the operation and maintenance of the finished products.

Sustainability governance

The NCC Board is continually informed about the activities of the various parts of the Group, including the aspects encompassed by the Group's sustainability framework. The Board conducts reviews and follow-ups to ensure that NCC is working in line with the Group's targets. The Board of Directors' Audit Committee is responsible for issues related to sustainability activities and the associated reporting. NCC's Senior Management Team (SMT) is responsible for establishing and monitoring the Group's sustainability targets, and processes issues covered by the sustainability framework. Each business area has responsibility for its respective sustainability activities and set operation-wide targets that are followed up in regular business reviews. The various group functions pursue sustainability activities that could relate to Group-wide responsibilities and support for individual business areas as well as specialist functions.

NCC has a Common Environment Team that pursues and coordinates Group-wide environmental topics. The Sustainability Reporting Board pursues and coordinates sustainability reporting. The Group Compliance Committee is responsible for follow-up of the implementation of NCC's Compliance Program as well as reviewing reports of suspected breaches of rules within NCC's whistleblower channel. To further support effective governance, all business areas are certified or work in accordance with ISO 14001 and ISO 9001. Substantial portions of the operational units are also certified in accordance with ISO 45001.

Policies and governing documents

The sustainability work is governed, inter alia, by the Group's sustainability framework, the Code of Conduct and policies such as a Sustainability Policy, an Environmental Policy, a Health and Safety Policy and Directive and a Compliance Directive.

The Code of Conduct defines NCC's position regarding sustainability matters as well as other areas of relevance for maintaining a high ethical standard and a responsible corporate culture. The Code of Conduct, along with NCC's values and Star behaviors, set forth the guiding principles for how NCC's employees and business partners are expected to act and behave. It also constitutes the foundation for the Code of Conduct for Suppliers.

NCC has a whistleblower function through which employees and other stakeholders can anonymously report their suspicions about behaviors or actions that contradict NCC's values and Code of Conduct.

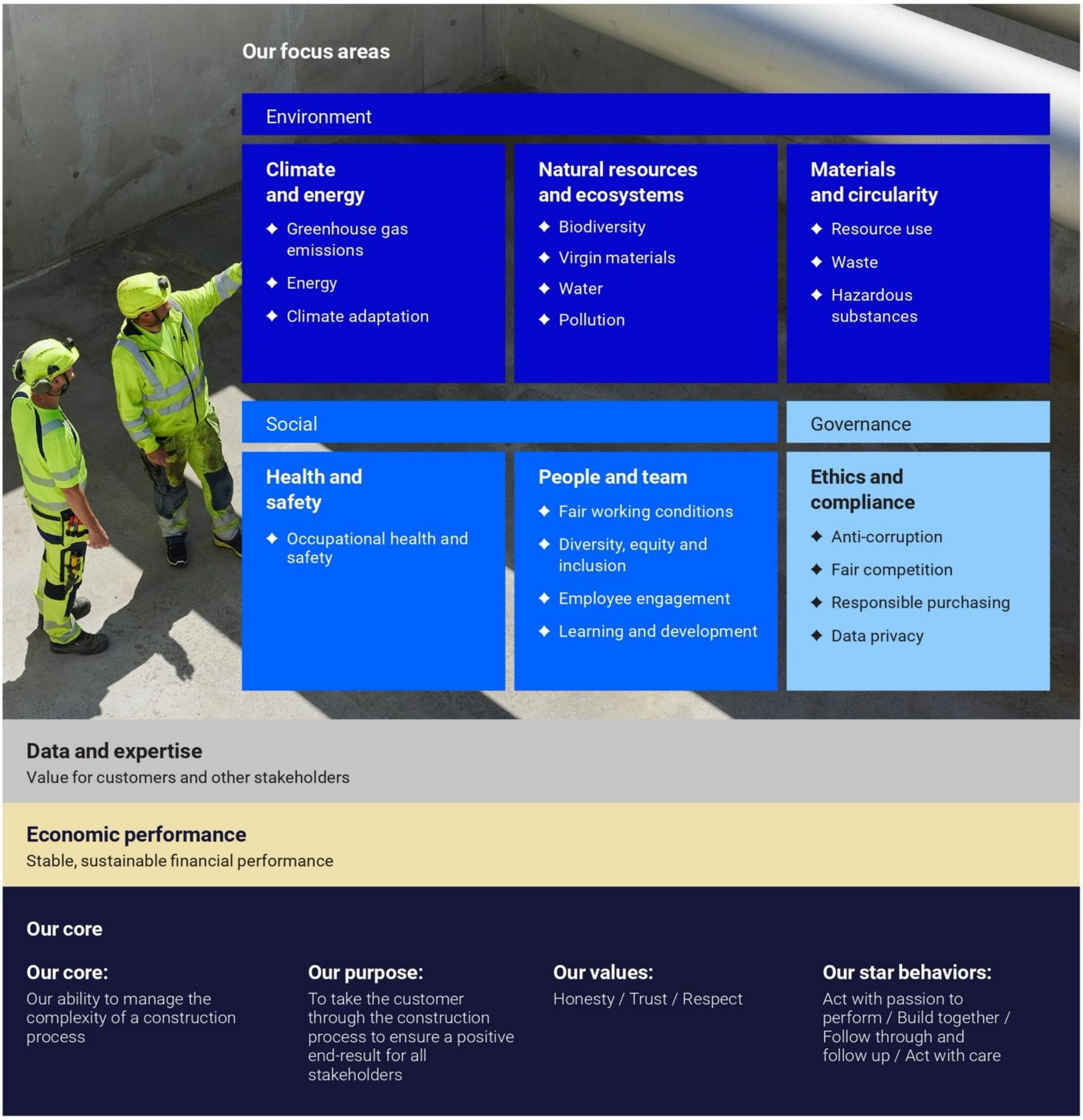
NCC’s sustainability framework

NCC’s sustainability framework forms the foundation for the Group’s work. It encompasses the work to pursue and develop operations to ensure that they generate long-term value – financially and in respect of the environment and climate, human health and wellbeing, and on the basis of sound ethical and governance principles.

The framework’s six impact areas illustrate the aspects and issues that are most important for NCC to work with and where the impact is greatest in the value chain. Three of the areas relate to environmental issues: Climate and energy, Natural resources and ecosystems, Materials and circularity. Two areas relate to social dimensions: Health and safety and People and team. One area focuses on how the company conducts its operations: Ethics and compliance.

The impact areas of NCC’s sustainability framework were confirmed when NCC conducted a double materiality assessment in the preparation of future reporting according to the CSRD. Some adjustments were made to the framework, including some additions that NCC considers strategically important to work with going forward.

NCC’s sustainability framework



Group-wide targets for sustainability work

NCC has Group-wide targets in two areas: Climate and energy and Health and safety. NCC also report and follow up work in other areas at Group level. Each business area then has relevant sustainability targets and key figures for its own operations.

The Sustainable Development Goals

NCC supports Agenda 2030 and the Sustainable Development Goals (SDGs). NCC's potential to contribute is integrated into our sustainability framework and the Group's overall work to develop the business.

Positive impact through core business

NCC's core business, building and developing the built environment, has the potential to contribute to achieving the SDG 7 (Affordable and clean energy), 9 (Industry, innovation and infrastructure), 11 (Sustainable cities and communities) and 12 (Responsible consumption and production).

Resource management

NCC has the potential, through its offerings, to contribute to developing products and work methods that improve the situation for both people and the environment. In this context, NCC has the potential to contribute to SDG 3 (Good health and well-being), 6 (Clean water and sanitation), 13 (Climate action), 14 (Life below water) and 15 (Life on land).

Based on our values: Honesty, Respect and Trust

NCC works with distinct and value-driven principles to promote SDG 4 (Quality education), 5 (Gender equality), and 8 (Decent work and economic growth). Cooperation and partnerships with various stakeholders are prerequisites for making the transition to a sustainable world by 2030, as reflected in 16 (Peace and justice strong institutions) and 17 (Partnerships to achieve the goal).

Reporting and disclosures

NCC reports on its sustainability work annually as part of the company's Annual Report. Previous years' sustainability reports have been prepared with reference to the Global Reporting Initiative (GRI). The 2024 Sustainability Report was structured and arranged to facilitate the transition to the 2025 Sustainability Statement, which will be prepared in accordance with the European Sustainability Reporting Standards (ESRS).

- NCC is a signatory of UN Global Compact and submits an annual Communication on Progress.
- NCC reports climate disclosures to the CDP.
- NCC reports on climate-related risks and opportunities in the Annual and Sustainability Report.
- NCC reports according to the EU Taxonomy.

Climate and energy

The construction industry accounts for considerable greenhouse gas emissions and the climate is a high-priority issue for NCC. NCC's target is to become climate neutral by 2045 and strives to eliminate emissions from the entire value chain, increase energy efficiency, phase out fossil energy sources, and enable adaptation to climate change.

NCC's climate and energy targets

- **75 percent reduction in CO_2e in own operations (Scope 1 and 2) by 2030.** Reduction of tons CO_2e/SEK M. Compared with 2015.
- **50 percent reduction in CO_2e across the value chain (Scope 3) by 2030.** Reduction of kilograms of CO_2e/purchased volume from concrete, asphalt and steel, and kilograms of CO_2e per MWh from transportation and machine services. Compared with 2015.

In our Property Development projects, the target is to reduce the climate impact under Scope 3 by 50 percent by 2030.

Collaboration and data-informed decisions to reduce carbon footprint

NCC's climate impact is primarily derived from the materials that are purchased and used in the construction process and from energy consumption in the various parts of the operations. NCC uses a significant amount of energy for machinery, heating and electricity at construction sites as well as in the production of asphalt. Upstream in the value chain, greenhouse gas emissions are primarily generated from extraction of virgin materials and from manufacturing processes.

NCC's efforts at reducing its climate emissions are based on the specific conditions and operation of each business area. Efficient resource utilization, purchases of materials with lower carbon emissions and increased use of recycled and reused products are essential in this work. These efforts are carried out in close collaboration with NCC's customers and clients, in conjunction with planning and procurement.

Digitization of data processing is necessary for long-term sustainable work processes, and for this reason climate calculations and joint IT development are key activities. NCC is proactive in its dialogue and collaboration with suppliers and participates in research and development projects to produce materials with a smaller carbon footprint.

The efforts to produce a coherent Group-wide climate transition plan continued during 2025 and will be made public in 2026.

Energy

Central efforts to reduce the carbon footprint include the energy efficiency of processes and production and phase out fossil energy sources. Carbon emissions related to purchased fuels, and electricity, district heating and district cooling, have in total declined since 2015.

In 2024, 1,9 tons of CO_2e per SEK M (-64%) was achieved, surpassing the 2030 target 2,08 (-60%) in advance. The revised target for own operations (Scope 1 and 2) is 75 %.

To continue to reduce carbon emissions, NCC is working with a series of initiatives such as energy-efficiency improvements in operations, electrification of machinery and transportation, optimized logistics chains to reduce the total number of transport journeys and economical driving and avoiding idling.

Key actions to reduce climate impact from the production of asphalt include continued conversion of asphalt plants to the use of biofuels and replacing fossil bitumen with bio-binders in the asphalt. NCC develops asphalt products with a lower climate impact through a method of increasing the proportion of reclaimed asphalt pavement (RAP), lowering manufacturing temperatures and using biofuel during production. Another action to reduce energy consumption is decreasing the number of starts and stops at asphalt plants and reducing moisture in the stone materials that are mixed into the asphalt and keeping it dry.

NCC also works with mass balance, which means utilizing all stone materials that are extracted from a quarry. A successful focus on mass balance, electrification and reducing idle time of wheel loaders, contributes to reducing energy consumption and carbon emissions.

To reduce energy consumption downstream in the value chain, the focus on enhancing energy efficiency in property development is an important measure. The NCC Property Development business area requires energy performance to be at least 25 percent better compared with regulations and to use local energy production in all projects.

Natural resources and ecosystems

NCC strives for responsible sourcing of materials and management of natural resources in ways that minimize the negative effects on biodiversity and ecosystems. This responsibility extends throughout the entire value chain – from sourcing to final construction. NCC is working to reduce the use of virgin materials, where the purchasing function plays a key role in ensuring traceability in the value chain and signing agreements with suitable operators. In construction projects, specific materials choices are made based on the needs and wishes of both the project and the customer. Different certification systems can also impose requirements on the use of certain materials.

In the construction industry, biodiversity is primarily affected by land use change and soil sealing. The impact varies depending on the location, which is why each project or site start must be preceded by an evaluation of nature value and placement.

NCC works actively to enhance biodiversity both within its own operations and in collaboration with customers during project planning and execution. All the business areas address biodiversity risks and opportunities in ways that reflect their specific operations. NCC Industry has defined actions and allocated resources to its production facilities to reduce risks and improve biodiversity in the local environments where its sites are located, according to a method called NCC Kielo. NCC Property Development, NCC Building Sweden and NCC Building Nordics can incorporate biodiversity measures and potential compensation actions directly into customer contracts. These business areas also devote resources to building certifications, many of which include biodiversity-related requirements. NCC Infrastructure contributes to biodiversity preservation through specific project solutions, such as the construction of wildlife passages.

Materials and circularity

NCC uses large amounts of materials, which has an impact on resource use in society as a whole. NCC strives to increase the use of circular and recycled materials, minimize and responsibly manage waste generated in the construction process, and design and build to facilitate recycling and reuse.

NCC's efforts on issues involving choice of materials, circularity and waste is performed based on each business area's specific conditions and operations and is designed to reduce the use of materials with a negative impact on climate, environment, and human health. Efficient resource utilization, purchases of materials with a lower environmental impact and increased recycling play an essential role in this work.

The construction waste generated at construction sites holds great potential since it can be used in other projects. NCC cooperates internally to develop new ways of reducing waste and reintroducing it into production as well as reusing and recycling materials. NCC is also collaborating with its suppliers to facilitate the circular flows of specific byproducts such as loading pallets, flooring waste, plaster, brick and wood. Significant activities include ensuring that surplus purchased materials can be reused, protecting weather-sensitive materials, minimizing packaging through intelligent transport solutions and having a well-developed sorting system. Cooperation concerning circularity also occurs between property development and contracting operations, on the basis of the projects' specific conditions.

All business areas are actively engaged in waste management. This includes using a larger share of recovered materials, ensuring the use of non-hazardous materials, applying standardized construction with made-to-measure and prefabricated products to reduce waste, and designing buildings so that the materials can be reused and recycled.

Environmental certification

NCC is certified and works in accordance with ISO 14001 and ISO 9001. For Property Development, sustainability certifications form the basis of sustainability work, and all projects conducted must have sustainability certification.

Minimum level for office, hotel, retail and logistics segments:

- BREEAM Excellent in Finland, Norway, and Sweden
- DNGB Gold in Denmark

Minimum level for public and other segments:

- BREEAM Excellent, Nordic Swan or Miljöbyggnad Silver in Sweden
- BREEAM Excellent or Nordic Swan in Finland and Norway
- DNGB Gold in Denmark

Cooperation with customers and suppliers

Achieving construction with reduced emissions requires cooperation, product development, innovation, requirement specifications and knowledge sharing not only with suppliers, but also with customers and other players in the industry, which entails action and a modified work approach.

NCC participates in industry-wide collaborations and initiatives promoting business with sustainability in focus in all markets and actively participates in the work of, for example, industry associations, business organizations, and chambers of commerce

Green Finance Framework

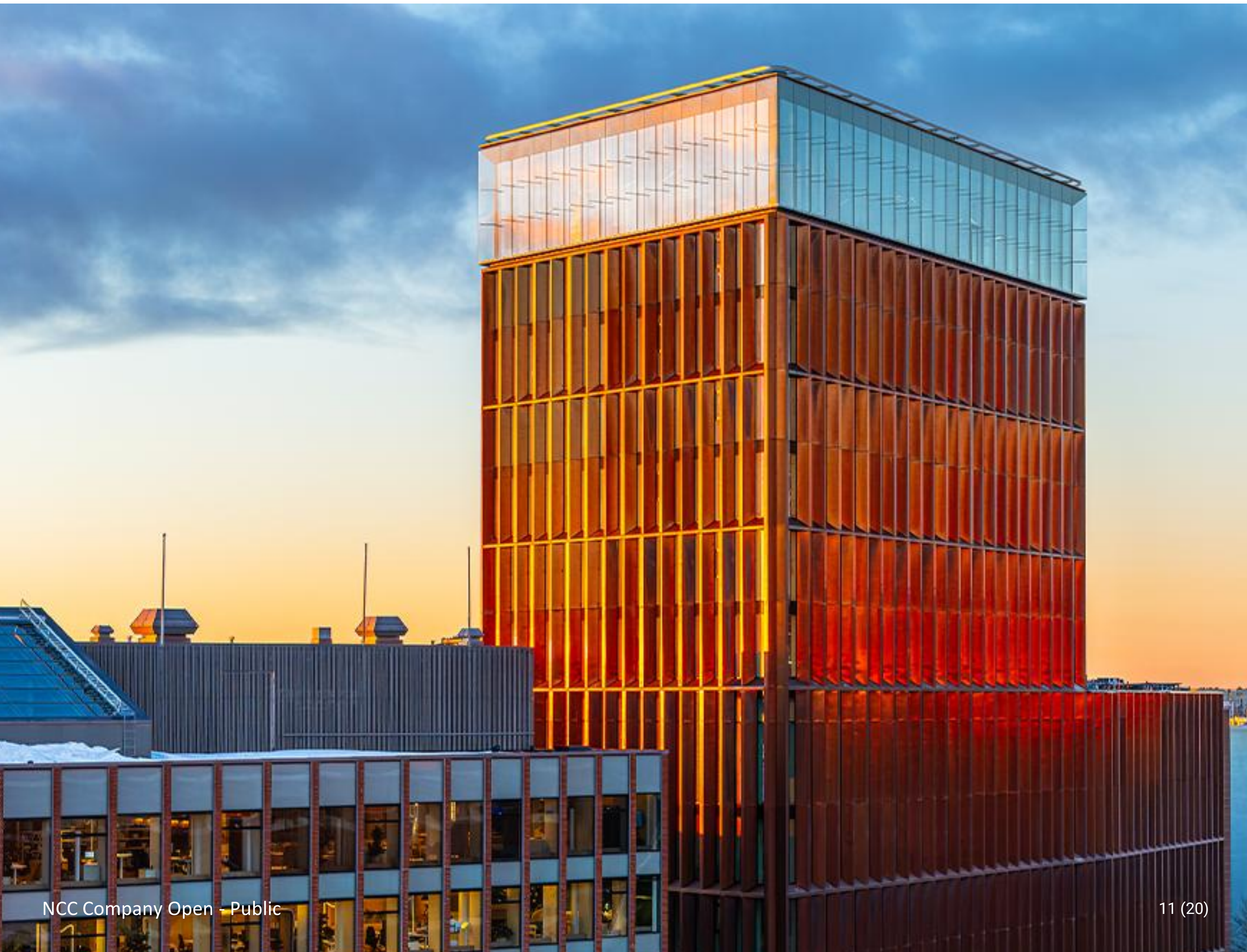
NCC’s Green Finance Framework (the Framework) has been developed as part of our continued commitment to integrate sustainability across the business. The Framework is structured in alignment with the Green Bond Principles 2025 (GBP) established by the International Capital Markets Association (ICMA), the Green Loan Principles 2025 (GLP) established by the Loan Market Association (LMA) and Asia Pacific Loan Market Association (APLMA).

These principles provide voluntary guidelines to support issuers in financing environmentally sound and sustainable projects, while providing transparency and insight into their estimated impact. The GBP further promote integrity in the development of the green bond market by clarifying the approach for issuing Green Bonds. In alignment with the GBP and GLP, the Framework consists of the four key components and recommended External Review. NCC may under this Framework issue Green Debt Instruments including Green Bonds and Green Loans.

The Framework has been developed to be aligned with the core components of the GBP and GLP:

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

S&P Global Ratings will provide a Second Party Opinion on this Framework, which will be made publicly available at NCC’s website. In accordance with the Green Bond Principles, NCC will continue to provide an annual Green Finance Report, formerly titled Green Bond Investor Report, until the maturity of any issued Green Debt Instruments and will engage an independent external auditor to provide a limited assurance.



Use of proceeds

The proceeds from NCC's issuances of Green Debt Instruments will exclusively be used to finance and/or refinance, whole or in part Eligible Assets and Projects within NCC, its subsidiaries or Joint Ventures. Proceeds from Green Debt Instruments will finance Eligible Assets and Projects according to this Framework where NCC has identified and manages environmental and societal risks as determined by NCC within the Code of Conduct, the Sustainability framework, the Sustainability Policy, the Environmental Policy and other guidelines and instructions available on NCC's website.

The proceeds raised on the back of this Framework can be applied towards new and existing capital expenditures, assets, R&D as well as selective operational expenditures that increase the lifetime or value of assets, according to the eligibility criteria in this Framework.

Conscious of the importance of a common definition of sustainable activities NCC will ensure that the Eligibility Criteria of the Eligible Green Projects and Asset are consistent, where relevant, possible and on a best effort basis, with the EU Taxonomy Regulation eligibility criteria and the Delegated Acts on Climate Change Mitigation and Adaptation adopted in June 2021 (the EU Taxonomy). Green Debt Instruments issued under this Framework will be referenced in the associated legal document.

Financing and refinancing

Financing is defined as allocation of proceeds from the issuance of Green Debt Instruments to fund current and future Eligible Green Assets and Projects realized at or after Green Debt Issuances, with a look back period of up to 12 months. Refinancing is defined as allocation of proceeds from the issuance of Green Debt Instruments to Eligible Assets and Projects with a lookback period beyond 12 months as long as they provide clear environmental benefits. For transparency reason investors should notice that when investments take place over several years the total investment might not be fully reported at once. Eligible Assets and Projects are reviewed annually and will qualify for financing or refinancing subject to meeting the eligibility criteria. NCC intend to allocate the proceeds from Green Finance Instrument at the earliest convenience and to the extent possible reach full allocation within two financial years. Information about the split between financed and refinanced assets will be included in the annual Green Finance Report.

Exclusions

This Framework will exclude investments directly related to activities associated with environmentally or socially harmful activities.

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Eligible Green Categories

GBP Green Project Category: Green buildings

Proceeds will be used for finance new and existing capital expenditures as well as selective maintenance and operational expenditures that increase the lifetime or value of properties as well as supportive infrastructure.

Development of properties
Financing of property development after 2020, with a primary energy demand (PED) that is, or will be, at least 25 per cent lower than the threshold set by the local building regulation in Sweden and at least 10 per cent lower in Denmark and Finland. The energy performance is or will be certified using a valid energy performance certificate (EPC).

NCC will perform material physical climate risk and vulnerability assessment of the properties and its expected lifespan. Based on this assessment NCC will, if needed, take actions to make the asset is climate resilient against flood risks and to make them resilient for people and financial values.

Upon completion, the properties will undergo testing for airtightness and thermal integrity. The life-cycle Global Warming Potential (GWP), allowing for a maximum amount of embodied carbon of 275 kg CO_2e /GFA covering module A1-A5.

NCC will take the waste hierarchy into account and safeguard preparation for re-use or recycling of at least 80% (by weight) of all non-hazardous construction and demolition waste generated at the construction site.

NCC will also ensure the properties are not built on arable or crop land, greenfield or forest land.

In addition, these properties will at least have or receive a design stage, post construction or in-use certification from either BREEAM SE Excellent or Outstanding, Miljöbyggnad Silver, Svanen, DGNB Gold or an equivalent environmental scheme.

Major renovation of properties
Financing of major renovations of existing properties that lead to a reduction in the PED of at least 30 percent, or renovations that comply with the applicable requirements for major renovations.

NCC will perform material physical climate risk and vulnerability assessment of the properties and its expected lifespan. Based on this assessment NCC will, if needed, take actions to make the asset is climate resilient against flood risks and to make them resilient for people and financial values.

Upon completion, the properties will undergo testing for airtightness and thermal integrity. The life-cycle Global Warming Potential (GWP), allowing for a maximum amount of embodied carbon of 150 kg CO_2e /GFA covering module A1-A5.

NCC will take the waste hierarchy into account and safeguard preparation for re-use or recycling of at least 80% (by weight) of all non-hazardous construction and demolition waste generated at the construction site.

In addition, these properties will at least have or receive a design stage, post construction or in-use certification from either BREEAM SE Excellent or Outstanding, Miljöbyggnad Silver, Svanen, DGNB Gold or an equivalent environmental scheme.

GBP Environmental objective:
Climate change mitigation

UN SDG:

Associated targets:
3.9, 7.2, 7.3, 11.6, 12.4, 12.5, 13.1, 15.5

EU Taxonomy Economic activities:
7.1 Construction of new buildings and 7.2 Renovation of existing buildings

GBP Green Project Category: Renewable energy

Proceeds will be used for financing new and existing capital expenditures, assets, R&D as well as selective operational expenditures that increase the lifetime or value of renewable energy assets and supportive infrastructure.

<u>Renewable energy for asphalt production</u>
Financing of conversion of asphalt plants from fossil to renewable energy sources such as wood oil from pine trees, wood pellets and biogas reducing CO_2 per kWh with at least 90% compared to fossil alternatives.

<u>Renewable energy for aggregates production</u>
Financing of electrification of aggregate production such as machinery and equipment being able to run on electricity as well as enabling infrastructure for electrification including transformer stations and high-, medium- and low-voltage cables reducing CO_2 per kWh at least 90% compared to fossil alternatives.

GBP Environmental objective:
Climate change mitigation

UN SDG:

Associated targets:
7.2

GBP Green Project Category: Energy efficiency

Proceeds will be used for financing new and existing capital expenditures, assets, R&D as well as selective operational expenditures that increase the lifetime or value of renewable energy assets and supportive infrastructure.

<u>Energy efficiency in asphalt production</u>
Financing of energy efficiency projects and initiatives in asphalt production including measures to reduce moisture content in ingoing material, reducing energy required to reach working temperature reducing energy consumption with at least 7,5% per produced ton. Figure is based on estimated average RA usage in own production, moisture reduction in STOCKPILES by George H. Simmons, Jr. Technical Paper T-129 and the resulting energy savings.

GBP Environmental objective:
Climate change mitigation

UN SDG:

Associated targets:
7.3

GBP Green Project Category: Environmentally sustainable management of living natural resources and land use

Proceeds will be used for financing new and existing capital expenditures, assets, R&D, as well as selective operational expenditures that increase or protects biological value of ecosystems.

Preservation and restoration of biodiversity and sustainable ecosystems
Financing of investments in our operation such as quarries and gravel pits to promote biodiversity, for example in accordance with NCC's Kielo methodology, a concept build upon the mitigation hierarchy to promote biodiversity and sustainable ecosystems ensuring clean water, responsible resource use, and thriving species. These investments include creating suitable conditions for endangered birds, insects, amphibians, and plants that depend on infertile soil or specialized habitats for survival and reproduction.

Preserving natural sand and ecosystems
Financing of investing in facilities for machine sand production to replace natural sand as a building material. Natural sand plays a crucial role in preserving water quality in the society, and transitioning to machine sand supports environmental conservation while ensuring responsible resource management.

GBP Environmental objective:
Biodiversity conservation

UN SDG:

Associated targets:
12.2, 13.1, 15.1

GBP Green Project Category: Circular economy adapted products, production technologies and processes

Proceeds will be used for finance new and existing capital expenditures, assets, R&D, as well as selective operational expenditures that increase the lifetime or value or waste management assets and supportive infrastructure.

Increasing the use of reclaimed asphalt (RA) in asphalt production
Financing of investments in equipment for recycling of RA in accordance with the waste hierarchy. The CO_2 reduction per invested SEK should be at least 0,75 in accordance with Naturvårdsverkets report 7133 (Klimatklivet) for cost effective emission reductions.

Recycling of reclaimed asphalt, concrete, bricks and excavated masses
Financing of investments in machinery and equipment for recycling reclaimed asphalt, concrete, bricks and excavated masses in accordance with the waste hierarchy. The given investment enables production of secondary products, able to substitute virgin products.

GBP Environmental objective:
Biodiversity conservation

UN SDG:

Associated targets:
12.5, 13.1

EU Taxonomy Economic activities:
Circular Economy 2.7, 3.4

Process for Project Evaluation and Selection

Project evaluation and selection is a key process in ensuring that the Assets and Projects financed by Green Debt Instruments meet the Eligibility Criteria set out in the Use of Proceeds section.

To ensure that proceeds from Green Debt Instruments are allocated to assets aligned with the criteria of this Framework, NCC has an established Green Finance Committee (GFC) to coordinate, validate, perform and review the selection of Eligible Green Assets and Projects. The GFC has permanent members from Management, Treasury, and Sustainability reporting and may consult other internal and external stakeholders when necessary.

The Eligible Green Assets and Projects will be selected following a consensus decision between Treasury and the sustainability functions in the business areas. The GFC meets at least semi-annually or when appropriate.

The main responsibilities of the GFC include but are not limited to:

1. Reviewing and validating the register of the Eligible Green Assets and Projects proposed by the investment or other relevant teams, based on the Eligibility Criteria.
2. Monitoring the Eligible Green Assets and Projects register during the lifetime of the Green Debt Instruments, and to remove Assets and Projects from the register that do not meet the criteria.
3. Approving any changes or updates to the Framework.
4. Developing the Green Finance Report.
5. Monitoring the changes related to the sustainable finance markets in terms of disclosure and reporting requirements.
6. Identifying and managing environmental and social risks.

The GFC follows the below process when selecting and evaluating projects for the Eligible Assets and Projects.

- Potential Eligible Green Projects and Assets has been identified in connection with the investment planning process, and a pre-evaluation is carried out by the treasury and sustainability teams.
- The list of potential Eligible Green Assets and Projects is then submitted to the Green Finance Committee that verifies the eligibility of the potential Assets and Projects with the Eligibility Criteria.

Eligible Green Assets and Projects added to the Green Register will be tracked and monitored by the GFC to make sure they remain aligned with the eligibility criteria in this Framework. In the case where an asset from the Green Register no longer meets the eligibility criteria outlined in this Framework (e.g. following divestment, liquidation, other concerns regarding alignment with eligibility criteria), the GFC will adjust the Eligible Green Asset Portfolio accordingly.

Management of Proceeds

NCC maintains a Green Register with the purpose to monitor that projects and assets financed by Green Debt Instruments will be entirely allocated to Eligible Green Assets and Projects. NCC intend to allocate the proceeds from Green Finance Instrument at the earliest convenience and to the extent possible reach full allocation within two financial years. Information about the split between financed and refinanced assets will be included in the annual Green Finance Report.

Unallocated proceeds may be temporarily placed in line with the liquidity reserves, taking the exclusion criteria into account and which is managed by the Treasury department. Relevant information regarding the issuance of Green Debt Instruments, as well as Assets and Projects financed or refinanced will be monitored and documented. The balance of the proceeds will be checked at least annually to account for any need to re-allocate proceeds which no longer fulfil the Eligibility Criteria. The Green Register will form the basis for the impact and allocation reporting.

Reporting

NCC is committed to transparent allocation and impact reporting on any relevant Green Finance Instrument. Over the duration of outstanding Green Debt Instruments, NCC will publish a Green Finance Report on the allocation and impact of the Green Debt Instruments issued under the Green Finance Framework. Where relevant, NCC will seek to align the reporting with the latest standards and practices as identified by ICMA in the Handbook Harmonised Framework for Impact Reporting issued in June 2024.

The Green Finance Report will provide information on the allocation of the proceeds of Green Debt Instruments and the environmental impacts of Eligible Green Projects financed by the instruments. The impact report will, to the extent feasible, also include a section with methodology, baselines and relevant impact metrics. The information will be made publicly available on NCC's website.

If competitive considerations, or a large number of underlying Assets and Projects limit the amount of detail that can be made available NCC may present information in generic terms or on an aggregated basis.

Allocating Reporting

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

1. A list of all Eligible Green Assets and Projects funded, including amounts allocated to each category as defined in the Use of Proceeds section.
2. The relative share of new financing versus refinancing.
3. A closer description of some of the Eligible Assets and Projects financed.
4. Geographical distribution.
5. The amount of unallocated proceeds.
6. The EU Taxonomy eligibility/alignment estimation (if feasible).

Impact Reporting

NCC recognises the importance of transparency and impact reporting and will strive to report on the actual or expected environmental impact of the investments financed by Green Debt Instruments according to the proposed metrics outlined in the below table.

These metrics may change over time subject to providing a relevant understanding of the impact. If the actual impact of an Eligible Asset or Projects cannot be systematically measured and reported (e.g. construction of new buildings or R&D), or once proven unreasonably difficult to establish, NCC will seek to provide information on the goals, estimated positive impact and results of the financed activities in relation to the actual impact.

Green Category	Examples of impact indicators
Development of properties	• Energy performance • Property certificate and level • Taxonomy alignment estimation • Energy performance in Primary Energy Demand (PED) (kWh per square meter) • Carbon intensity (kilograms per square meter) and annual carbon savings (tonnes). The greenhouse gas emissions are monitored in accordance with the Greenhouse Gas Protocol • The share (%) of renewable energy in relation to the total energy usage of the asset
Waste management	Recycled waste (tonnes)
Renewable energy	Number of converted projects and expected or actual environmental impacts from Eligible Projects when relevant and feasible.
Environmentally sustainable management of living natural resources and land use	Each investor report will include at least one example, where applicable, of an investment that has been funded with green net proceeds. KPIs will not be disclosed beforehand in this Framework. Maintaining biodiversity and delivering ecosystem services
	Number of facilities to produce machine sand and expected or actual environmental impacts from Eligible Projects when relevant and feasible.

External Review

Second Party Opinion (pre-issuance)

NCC has appointed S&P Global Ratings as an external reviewer to provide, in accordance with the Guidelines for External Reviews developed by the Green and Social Bond Principles, an independent ex-ante Second Party Opinion on NCC´s Green Finance Framework. The full Second Party Opinion and this framework will be publicly available on NCC's website.

External verification (post issuance)

On an annual basis, NCC will engage an independent external auditor to provide a limited assurance on both allocation and impact reporting, until the proceeds of the Green Finance Instrument have been fully allocated. This will confirm that the allocation has been carried out in all material respects in compliance with the Eligibility Criteria set forth in this framework and that the impacts reported are in accordance with the applicable reporting criteria and free from material misstatement. The Green Finance Report and the related limited assurance report will be available on NCC's website.

Publicly available documents

The Green Finance Framework, Second Party Opinion and Green Bond Investor Report will be publicly available on NCC's website.

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