



Brage Finans

Green Bond Second Opinion

January 16, 2020

Brage Finans AS is an independent credit institution owned by twelve Norwegian savings banks. The company offers financing solutions, mainly equipment financing, to both retail and corporate clients, mainly in the form of leasing and secured lending.

Brage Finans' Green Bond Framework covers financing transport and machinery, renewable energy, and aquaculture. The framework provides a clear and restrictive set of criteria for eligible investments. Machinery covers the sectors construction, agriculture, and forest management. Renewable energy sources included are solar and wind. Wind power construction in Norway sometimes faces local resistance. There is a risk that the equipment finance under this framework could be involved in such projects. As the company finances equipment, not projects, it will finance equipment related to wind power, not wind farms in their entirety. For aquaculture, the framework requires the fish farm to be certified by the Aquaculture Stewardship Council, excludes financing of equipment using fossil fuels, and provides additional safeguards against deforestation problems related to soy-use in feed. Green bond proceeds can be used for new loans or refinancing.

The company has integrated environmental considerations into its business strategies, daily operations as well as in relationships with various stakeholders. As one of the first financial companies, Brage Finans received an Eco-Lighthouse certification in 2019. It aims for carbon neutrality by the end of 2020 (scope 1 and 2 emissions) and has a very low exposure to fossil fuel extracting industries. The company plans to start implementing the recommendations from TCFD in 2020.

Based on an assessment of the framework's alignment with the Green Bond Principles, the project categories and Brage's governance, Brage's green bond framework receives the overall **CICERO Dark Green** shading and a governance score of **Good**. Governance could be further strengthened by adding formal environmental expertise to the staff.

SHADES OF GREEN

Based on our review, we rate the Brage Finans's green bond framework **CICERO Dark Green**.

Included in the overall shading is an assessment of the governance structure of the green bond framework. CICERO Shades of Green finds the governance procedures in Brage Finans's framework to be Good.



GREEN BOND PRINCIPLES

Based on this review, this Framework is found in alignment with the principles.





Contents

1	Terms and methodology	3
	Expressing concerns with 'shades of green'	3
2	Brief description of Brage Finans's green bond framework and related policies	4
	Environmental Strategies and Policies	4
	Use of proceeds	5
	Selection:	5
	Management of proceeds	6
	Reporting	6
3	Assessment of Brage Finans's green bond framework and policies	7
	Overall shading	7
	Eligible projects under the Brage Finans's green bond framework	7
	Background	9
	Governance Assessment	11
	Strengths	11
	Weaknesses	12
	Pitfalls	12
	Appendix 1: Referenced Documents List	13
	Appendix 2: About CICERO Shades of Green	14



1 Terms and methodology

This note provides CICERO Shades of Green's (CICERO Green) second opinion of the client's framework dated January 2020. This second opinion remains relevant to all green bonds and/or loans issued under this framework for the duration of three years from publication of this second opinion, as long as the framework remains unchanged. Any amendments or updates to the framework require a revised second opinion. CICERO Green encourages the client to make this second opinion publicly available. If any part of the second opinion is quoted, the full report must be made available.

The second opinion is based on a review of the framework and documentation of the client's policies and processes, as well as information gathered during meetings, teleconferences and email correspondence.

Expressing concerns with 'shades of green'

CICERO Green second opinions are graded dark green, medium green or light green, reflecting a broad, qualitative review of the climate and environmental risks and ambitions. The shading methodology aims to provide transparency to investors that seek to understand and act upon potential exposure to climate risks and impacts. Investments in all shades of green projects are necessary in order to successfully implement the ambition of the Paris agreement. The shades are intended to communicate the following:

CICERO Shades of Green



Dark green is allocated to projects and solutions that correspond to the long-term vision of a low carbon and climate resilient future. Fossil-fueled technologies that lock in long-term emissions do not qualify for financing. Ideally, exposure to transitional and physical climate risk is considered or mitigated.



Medium green is allocated to projects and solutions that represent steps towards the long-term vision, but are not quite there yet. Fossil-fueled technologies that lock in long-term emissions do not qualify for financing. Physical and transition climate risks might be considered.



Light green is allocated to projects and solutions that are climate friendly but do not represent or contribute to the long-term vision. These represent necessary and potentially significant short-term GHG emission reductions, but need to be managed to avoid extension of equipment lifetime that can lock-in fossil fuel elements. Projects may be exposed to the physical and transitional climate risk without appropriate strategies in place to protect them.



Brown is allocated to projects and solutions that are in opposition to the long-term vision of a low carbon and climate resilient future.

Examples



Wind energy projects with a strong governance structure that integrates environmental concerns



Bridging technologies such as plug-in hybrid buses



Efficiency investments for fossil fuel technologies where clean alternatives are not available



New infrastructure for coal

Sound governance and transparency processes facilitate delivery of the client's climate and environmental ambitions laid out in the framework. Hence, the governance aspects are carefully considered and reflected in the overall shading of the green bond framework. CICERO Green considers four factors in its review of the client's governance processes: 1) the policies and goals of relevance to the green bond framework; 2) the selection process used to identify and approve eligible projects under the framework, 3) the management of proceeds and 4) the reporting on the projects to investors. Based on these factors, we assign an overall governance grade: Fair, Good or Excellent.



2 Brief description of Brage Finans's green bond framework and related policies

Brage Finans AS is an independent credit institution headquartered in Bergen, Norway, and licensed by the Norwegian Financial Supervisory Authority. Brage Finans was established in 2010 and is owned by twelve Norwegian savings banks. The company offers financing solutions, mainly equipment financing, to both retail and corporate clients, mainly in the form of leasing and secured lending. Brage Finans' financial services offering is sold via the company's owners, third party suppliers as well as through own channels.

Of the lending portfolio of 11.3 billion NOK, 28% is to the retail market and 72% to the corporate market. The most important sectors are transport (12.4% of total portfolio per 2019), construction (12.3%), administrative and support service (11.1%), industry (8%), aquaculture (6.9%), and wholesale and retail trade; repair of motor vehicles (5.2%). Agriculture accounts for 2.8%. Brage mainly finances mobile assets. Of private loans, car loans constitute 89%. Across sectors, light vehicles account for 40%, construction machinery for 15% and other transport (larger motorized vehicles (e.g. buses and trucks) and non-motorized objects (e.g. trailers)) for 13%. According to the issuer loans to the oil and gas sector (including suppliers to this sector) account for less than 3% of the portfolio.

Environmental Strategies and Policies

Sustainability is an integrated part of Brage Finans' corporate strategy, where the company wishes to promote sustainable development through its operations and product offering and states that sustainability is part of their credit ratings. The company will strive to increase the proportion of green investments both in the retail and corporate portfolios. For retail clients, the company offers Green Car Loans with reduced interest rate for purchasing of electric cars. Such loans currently account for 20% of retail car loans. The goal is that they will constitute 40% of new loans over the next two years. For corporate clients, Brage Finans also provides financing for electric car charging stations, recycling and waste management solutions. The company is also looking to add new green financial products, such as financing of solar panels. Brage Finans generally wishes to finance newer assets as these tend to have higher environmental performance, for example electric cars. Because most of the financed assets are mobile, the physical impact risk from climate change is considered low.

Brage Finans supports the ten principles outlined in the UN Global Compact regarding human rights, labour rights, the environment and anti-corruption. With the UN Global Compact as guiding principles, these areas have all been integrated into Brage Finans' business strategies, daily operations as well as in relationships with various stakeholders. For example, loans for electric vehicles are offered at lower interest than other car loans.

Brage Finans does not offer financial services to companies involved in extraction of, or power generation based on, coal or oil sands. Its credit policy also states that the company should be restrictive in offering financial services to clients developing or selling products with significant negative impact on environment, nature or human rights. Concrete examples of investments turned down for environmental reasons are machinery related to road construction and tanks for chemical storage. Loans to the oil and gas sectors (including suppliers to these sectors) accounted for 4.9% of the portfolio in 2015. It was reduced to 2.7% a year later, the company has informed us.



As one of the first financial companies, Brage Finans received an Eco-Lighthouse certification in 2019. The main objective of this certification is to ensure climate and environmental aspects are integrated in the main business activities of a company. The criteria for the financial sector are also meant to promote integration of the recommendations in Finans Norge's "Roadmap for Green Competitiveness in the Financial Sector" published in June 2018. This roadmap details several recommendations for banks, asset managers and insurance companies on how to promote low-carbon and climate-resilient development through their operations. Examples include integration of climate risks in investment and financing decisions.

Through the Eco-Lighthouse scheme, Brage Finans reports metrics relevant for its environmental impact through *inter alia* energy use, procurements, transport and waste productions. The company has a goal to be climate neutral by the end of 2020 (scope 1 and scope 2 emissions) and has informed us that they are close to reaching this target at the time of writing. It has recently started mapping the share of "green" objects in the portfolio. Annual reports from 2019 onwards will be accompanied with a corporate social responsibility report.

The company plans to start implementing the recommendations from TCFD in 2020.

Use of proceeds

Net proceeds from Brage Finans' Green Bonds will be used to finance a portfolio of loans and leases, in whole or in part, that promote the transition to low-carbon and climate-resilient development. Only such loans and leases that comply with the list of Eligible Green Loans below are deemed eligible for Green Bond funding. Categories are clean transportation and machinery, renewable energy, and sustainable aquaculture.

Net proceeds from Green Bonds can be used for the financing of new loans and leases, as well as for refinancing of existing loans and leases.

Green Bonds will not be used to finance investments linked to fossil energy generation, nuclear energy generation, research and/or development within weapons and defence, potentially environmentally negative resource extraction, gambling or tobacco.

Selection:

The selection process is a key governance factor to consider in CICERO Green's assessment. CICERO Green typically looks at how climate and environmental considerations are considered when evaluating whether projects can qualify for green finance funding. The broader the project categories, the more importance CICERO Green places on the governance process.

For inclusion in the pool of Eligible Green Loans, loans and leases must meet the criteria of this Green Bond Framework as outlined in Table 1.

To ensure transparency and accountability around the selection of Eligible Green Loans, Brage Finans has established an internal Green Bond Committee, consisting of members from the Credit, Compliance and Treasury Departments. Members will have expertise on the relevant sectors and technologies, including knowledge about sustainability in each sector. There are no employees working solely on environmental issues.

Brage Finans' Credit Department will be responsible for nominating loans and leases to the Green Bond Committee, which in turn will evaluate and select loans and leases for inclusion in the pool of Eligible Green Loans in accordance with the criteria and definitions in this Green Bond Framework. Brage Finans' loan portfolio is categorised according to type of asset being financed, and tagging will be made on asset level.



All decisions made by the Green Bond Committee will be in consensus. Decisions will be documented and filed and selected loans and leases will be tagged in Brage Finans' internal systems to ensure traceability.

Brage Finans acknowledges that Green Bond market standards are still evolving and the Green Bond Committee will evaluate the need for future updates to this Green Bond Framework depending on market developments.

Management of proceeds

Net proceeds from issued Green Bonds will be tagged in Brage Finans' internal systems and earmarked for financing and refinancing of Eligible Green Loans as defined by this Green Bond Framework.

Brage Finans' Treasury Department will ensure that the amount of Eligible Green Loans at all times exceed the total amount of Green Bonds outstanding. If a loan or lease financed by Green Bonds no longer qualifies as an Eligible Green Loan in accordance with this Green Bond Framework, it will be excluded from the pool of Eligible Green Loans and if needed it will also be replaced by other qualifying loans or leases.

Net proceeds from Green Bonds awaiting allocation to Eligible Green Loans will be managed according to the overall liquidity management policy of Brage Finans and may be invested in short term money market instruments and cash.

An independent external auditor appointed by Brage Finans will on an annual basis provide limited assurance that an amount equal to Green Bond net proceeds has been allocated to Eligible Green Loans.

Reporting

Transparency, reporting, and verification of impacts are key to enable investors to follow the implementation of green finance programs. Procedures for reporting and disclosure of green finance investments are also vital to build confidence that green finance is contributing towards a sustainable and climate-friendly future, both among investors and in society.

To enable investors and other stakeholders to follow the developments of Brage Finans' issuance of Green Bonds and the Eligible Green Loans being financed, an investor letter will be made available on the company's website. The investor letter will include an allocation report and an impact report and be published annually after issuance of the first green bond and as long as there are Green Bonds outstanding. Reports will be compiled jointly by the credit and finance divisions. An external auditor will review and verify allocation reports. Brage Finans aims for external review and verification of impact reports as well, and has requested an offer on this service from its auditor.

An allocation report will contain amounts invested in each of the categories, the amount of new financing versus refinancing, the nominal amount of Green Bonds outstanding, the amount of net proceeds awaiting allocation and examples of assets financed. The impact report aims to disclose the environmental impact of financed Eligible Green Loans. Impact reporting will be made on a portfolio basis. The assessment of environmental impact will be based on the Key Performance Indicators listed in the framework, with the reservation that relevant data may not be available for each Eligible Green Loan. Methods for calculation will be described in the investor letter.



3 Assessment of Brage Finans's green bond framework and policies

The framework and procedures for Brage Finans's green bond investments are assessed and their strengths and weaknesses are discussed in this section. The strengths of an investment framework with respect to environmental impact are areas where it clearly supports low-carbon projects; weaknesses are typically areas that are unclear or too general. Pitfalls are also raised in this section to note areas where Brage Finans should be aware of potential macro-level impacts of investment projects.


This Green Bond Framework is aligned with the Green Bond Principles published in 2018 by the International Capital Markets Association and has been prepared in cooperation with DNB. Recognising that the Green Bond market and best practices are still evolving, Brage Finans will follow market developments and when deemed necessary by the company make appropriate updates to this Green Bond Framework.

Overall shading

Based on the project category shadings detailed below, and consideration of environmental ambitions and governance structure reflected in Brage Finans's green bond framework, we rate the framework **CICERO Dark Green**.

Eligible projects under the Brage Finans's green bond framework

At the basic level, the selection of eligible project categories is the primary mechanism to ensure that projects deliver environmental benefits. Through selection of project categories with clear environmental benefits, green bonds aim to provide investors with certainty that their investments deliver environmental returns as well as financial returns. The Green Bonds Principles (GBP) state that the "overall environmental profile" of a project should be assessed and that the selection process should be "well defined".

Category	Eligible project types	Green Shading and some concerns
Clean Transport and Machinery 	<ol style="list-style-type: none">1. Loans and leases to finance electric vehicles including, but not limited to, cars, trucks and public transport as well as electric machinery for construction, forestry management and agriculture.2. Loans and leases to finance infrastructure for providing electricity to the above-mentioned objects.	Dark Green <ul style="list-style-type: none">✓ Zero-carbon vehicles and machinery are an integral part of a zero-emissions future.✓ For personal vehicles, electric cars already make up a large share of new sales, as a result of tax exemptions and other types of support.



3. Loans and leases to finance infrastructure for the above-mentioned public transport services.

- ✓ There are concerns about the climate, environmental, and social impacts of battery production.
- ✓ Electric public transportation is essential to achieving a low-carbon society. However, the largest amount of carbon savings come from switching from inefficient modes of transport (e.g. private cars) to mass transit.
- ✓ Electric machinery can contribute to substantial emissions reductions in construction, agriculture, and forestry management.

Renewable Energy



Loans and leases to finance solar power installations as well as technologies and equipment related to renewable energy installations within solar and wind

Dark green

- ✓ Renewable energy is an essential part of achieving the long-term net zero emissions future.
- ✓ Mind impacts on biodiversity, landscapes and affected communities in all power projects, and especially regarding wind power projects.
- ✓ Wind power construction in Norway sometimes faces local resistance. There is a risk that the equipment financed under this framework could be involved in such projects.
- ✓ Construction or upgrading of access roads should be kept to a level that ensures the proper functioning of the project but that does not encourage increased car use by the local population.
- ✓ Machinery for installation should use best available technology to minimize emissions in the construction phase.

Sustainable Aquaculture

Loans and leases to finance fish farm equipment, such as, but not limited to, non-chemical sea lice management, escape prevention, waste management

Medium green

- ✓ Farmed salmon is a protein source with low carbon footprint compared to red meat.



and sustainable feed production, that meet the following minimum criteria:

- the fish farm must be certified by the Aquaculture Stewardship Council (ASC), and
 - the equipment must not run on fossil fuel.
 - feed used at the fish farm must only use soy protein concentrate that is certified either by the Round Table for Responsible Soy's (RTRS) Segregation certificate or by ProTerra, and
 - the aquaculture company must be able to document that the producer of the feed used at the farm engages in a dialogue with its supplier of soy protein concentrate, encouraging it to reduce deforestation in all of its operations, not only in its productions share that is certified
- ✓ However, there is a climate risk regarding aquaculture in that soy used for feed may drive up demand for deforestation.
 - ✓ The certificates required in the framework ensures that soy used in the feed does not come from recently deforested land. In additions, the framework requires documented dialogue with soy suppliers to encourage them to reduce deforestation in all of their operations.
 - ✓ There are other serious concerns about the environmental impacts of aquaculture, including escapes, antibiotic use, chemicals use, overexploitation of wild fish stocks for feed, and sea lice.
 - ✓ The ASC safeguards on these issues by setting stricter limits than national regulation, but has been criticized for tolerating 300 escaped fish per production cycle and for a lenient limit on hydrogen peroxide.
 - ✓ The ASC does not consider fossil fuel emissions at the farm. However, the framework excludes financing of equipment run on fossil fuel.

Table 1. Eligible project categories

Background

Transportation is responsible for 24% of direct CO₂ emissions from fuel combustion globally. Road vehicles – cars, trucks, buses and two- and three-wheelers – account for nearly three-quarters of transport CO₂ emissions.¹ Global transport emissions grew by only 0.6% in 2018 (compared to 1.7% annually over the past decade) as efficiency improvements, electrification and biofuels helped limit the growth in energy demand. To meet the SDG goals, direct transport emissions must peak in the early 2020s and then fall by 13.9% until 2030 to support the IEA's Sustainable Development Scenario. The largest amount of carbon savings come from switching from inefficient modes of transport (e.g. private cars) to mass transit. In Norway, road traffic accounted for 17.5% of

¹ <https://www.iea.org/tcep/transport/>



territorial GHG emissions in 2018. Emissions from this sector have increased by 2.8% from 2017 and by 26% from 1990.

In 2017, renewable electricity generation grew 6% and reached a quarter of global power output, thanks to the continued growth of solar PV and wind technologies. Despite these positive trends (especially with PV), additional efforts are needed in renewable power generation to meet the targets set out in the IEA's SDS. According to the IEA, the share of renewables in global electricity generation must reach 47% by 2030, up from 25% in 2017.²

Aquaculture is a booming industry, and surpassed fisheries as the main provider of seafood globally in 2014. No reliable estimate of aquaculture's contribution to global GHG emissions exist. In comparison with other protein sources, the carbon footprint of farmed salmon is relatively low. A study from 2009 found it has a very similar-sized footprint to wild-caught cod, while higher than, for example, herring and mackerel³. A recent study finds that it has a lower climate footprint than pork and beef, while higher than chicken.

The footprint (at slaughter) is made up almost entirely by the feed production. (However, air transport over long distances can increase the final product's footprint manifold.⁴). Notably, footprint estimates do not capture emissions from land-use change caused by converting natural land to agricultural land, as no methodology exists. Aquaculture is the largest source of demand for soy imports to Norway. There are concerns that demand for soy contributes to demand for tropical deforestation, and thus to GHG emissions and other negative environmental impacts. Soy protein concentrate make up 10%-26% of the feed produced in Norway⁵, around 85% of which is imported from Brazil⁶.

The ASC⁷ has a criterion that soy be sustainably sourced, i.e., certified by the Roundtable for Responsible Soy (RTRS) or equivalent, but this criterion will not take effect until 2022. For a property to be RTRS⁸ certified, no native forests have been cleared or converted later than May 2009. Stricter rules apply for land conversions later than June 2016, after which no conversion of natural land can have taken place. RTRS offers two alternative soy certificates. The strictest alternative (Segregation) ensures that the soy from certified properties is kept physically separate from soy from non-certified properties. The Mass Balance alternative allows for physical mixing in storage, transport, and processing, as long as the share of soy sold as certified equals the share of soy produced on certified properties. An alternative soy certification scheme is ProTerra⁹. A comparison with RTRS finds that it has stricter criteria in many areas, but is weaker on transparency¹⁰. ProTerra does not allow physical mixing. Most soy protein concentrate imported to Norway is ProTerra certified.¹¹ A problem with all certification schemes is that major soy producers currently only certify a small share of their production, while the rest may contribute to deforestation. The most sustainable solution for feed producers would be to trade only with soy producers who do not contribute to deforestation in any of its operations. As this would be difficult at present, a viable short-term alternative is for feed producers and consumers to enter into a dialogue with suppliers of SPC

² <http://www.iea.org/tcep/power/renewables/>

³ Ziegler, F. et al 2012. The Carbon Footprint of Norwegian Seafood Products on the Global Seafood Market. *Journal of Industrial Ecology* 17(1):103-117.

⁴ Ziegler, F. et al 2012.

⁵ Regnskogsfondet og Framtiden i Våre Hender 2017. Fra brasiliansk jord til norske middagsbord. En rapport om soya i norsk laksefôr.

⁶ SSB 08001

⁷ Aquaculture Stewardship Council 2017. ASC Salmon Standard v1.1 – April 2017

⁸ Roundtable for Sustainable Soy 2017. RTRS Standard for Responsible Soy Production Version 3.1

⁹ ProTerra Standard – Social Responsibility and Environmental Sustainability. Version 4.1 – September 25, 2019

¹⁰ Regnskogsfondet og Framtiden i Våre Hender 2017

¹¹ Regnskogsfondet og Framtiden i Våre Hender 2018. Salmon on soy beans – Deforestation and land conflict in Brazil.



to work toward achieving zero deforestation. Replacing SPC with more sustainable alternatives would avoid the deforestation concerns.

Aquaculture is also associated with several other environmental problems, including escapes, antibiotic use, chemicals use, overexploitation of wild fish stocks for feed, sea lice, and algal blooms. The ASC scheme address these issues, in many areas setting much stricter standards than Norwegian regulation, which is already stricter than other national regulations¹². However, the ASC has been criticized for tolerating 300 escaped fish per production cycle and for a lenient limit on hydrogen peroxide.

Governance Assessment

Four aspects are studied when assessing Brage Finans's governance procedures: 1) the policies and goals of relevance to the green bond framework; 2) the selection process used to identify eligible projects under the framework; 3) the management of proceeds; and 4) the reporting on the projects to investors. Based on these aspects, an overall grading is given on governance strength falling into one of three classes: Fair, Good or Excellent.

The company aims to integrate sustainability into corporate strategy and is certified as an Eco-Lighthouse. The Green Bond Framework provides clear and relatively restrictive criteria. To ensure transparency and accountability around the selection of Eligible Green Loans, Brage Finans has established an internal Green Bond Committee. Members have expertise on the relevant sectors and technologies, including knowledge about sustainability in each sector. There are no employees working solely on environmental issues. An independent external auditor appointed by Brage Finans will on an annual basis provide limited assurance that an amount equal to Green Bond net proceeds has been allocated to Eligible Green Loans. An investor letter including an allocation report and an impact report will be published annually on the company's website.



The overall assessment of Brage Finans's governance structure and processes gives it a rating of Good.

Strengths

As one of the first financial companies, Brage Finans received an Eco-Lighthouse certification in 2019. Sustainability is an integrated part of Brage Finans' corporate strategy, where the company wishes to promote sustainable development through its operations and product offering and states that sustainability is part of their credit ratings. Brage Finans supports the ten principles outlined in the UN Global Compact regarding human rights, labour rights, the environment and anti-corruption and seeks to integrate these considerations into business strategies, daily operations and relationships with various stakeholders. The company plans to start implementing the recommendations from TCFD in 2020.

There is a clear strength that under the Transport and Machinery category only vehicles/equipment that are fully electric are eligible. These objects are part of the long-term net-zero emissions future. Electric public transport financed is particularly energy-efficient and sustainable. Electric machinery for agriculture and forestry are emerging technologies and hence particularly worthy of support. The company has informed us that they mostly

¹² Vormedal, I. and Gulbrandsen, L. (2018). Business interests in salmon aquaculture certification: Competition or collective action? *Regulation & Governance*.



finance equipment for renewable energy of relatively small size, and that solar panels are the most interesting objects for them. These have no or limited negative social and landscape effects.

The Aquaculture category requires ASC certification, which is regarded as the strictest scheme on environmental issues.¹³ The framework also addresses two climate-related weaknesses in the scheme, by setting stricter safeguards against deforestation, and by excluding financing of equipment using fossil fuel.

Weaknesses

There are no major weaknesses in the framework.

Pitfalls

Air transport of farmed salmon is emissions intensive. Aquaculture entails risks of several forms of local environmental degradation. Fish escapes pose a serious threat to wild salmon stocks. The ASC certification aims to reduce this threat by setting a stricter limit than Norwegian regulation on the number of escaped fish tolerated but has been criticized for not being strict enough.

Wind power construction in Norway sometimes faces local resistance. There is a risk that the equipment finance under this framework could be involved in such projects.

CICERO Green has some further concerns that not all green bond items will be listed publicly and that only the aggregate amounts allocated to the various Eligible Green Asset Categories will be made public. This limitation is understandable given that Brage Finans mostly finances objects rather than projects. The concerns are partially mitigated since Brage will engage an independent third party to provide assurance on allocation.

¹³ <https://www.bestfishes.org.uk/wp-content/uploads/Accreditation-table-v1.1.pdf>



Appendix 1: Referenced Documents List

Document Number	Document Name	Description
1	Brage Finans Green Bond Framework	The Framework of the Green Bond.
2	Årsrapport 2018	Annual report 2018
3	Årlig klima- og miljørapport 2018	Annual climate and environment report 2018
4	Bærekraftige kredittprosesser i Brage Finans	Brage Finans' approach to sustainability in lending activities and to corporate social responsibility.
5	Miljøkartlegging 2019	Assessment of Brage Finans on the criteria for Environmental Lighthouse (Miljøfyrtårn) certification.
6	Presentasjon Brage Finans 30 09 19	Powerpoint presentation of the company.



Appendix 2: About CICERO Shades of Green

CICERO Green is a subsidiary of the climate research institute CICERO. CICERO is Norway's foremost institute for interdisciplinary climate research. We deliver new insight that helps solve the climate challenge and strengthen international cooperation. CICERO has garnered attention for its work on the effects of manmade emissions on the climate and has played an active role in the UN's IPCC since 1995. CICERO staff provide quality control and methodological development for CICERO Green.

CICERO Green provides second opinions on institutions' frameworks and guidance for assessing and selecting eligible projects for green bond investments. CICERO Green is internationally recognized as a leading provider of independent reviews of green bonds, since the market's inception in 2008. CICERO Green is independent of the entity issuing the bond, its directors, senior management and advisers, and is remunerated in a way that prevents any conflicts of interests arising as a result of the fee structure. CICERO Green operates independently from the financial sector and other stakeholders to preserve the unbiased nature and high quality of second opinions.

We work with both international and domestic issuers, drawing on the global expertise of the Expert Network on Second Opinions (ENSO). Led by CICERO Green, ENSO contributes expertise to the second opinions, and is comprised of a network of trusted, independent research institutions and reputable experts on climate change and other environmental issues, including the Basque Center for Climate Change (BC3), the Stockholm Environment Institute, the Institute of Energy, Environment and Economy at Tsinghua University and the International Institute for Sustainable Development (IISD).

