

SECOND PARTY OPINION (SPO)

Sustainability Quality of the Issuer and Sustainable Funding Framework

Caixa Geral de Depósitos, S.A.

22 September 2025

VERIFICATION PARAMETERS

Type(s) of instruments contemplated

- Sustainable Funding Instruments¹
- Green Bond Principles (GBP), as administered by the International Capital Market Association (ICMA) (as of June 2025)
- Social Bond Principles (SBP), as administered by the International Capital Market Association (ICMA) (as of June 2025)
- Sustainability Bond Guidelines (SBG), as administered by the International Capital Market Association (ICMA) (as of June 2021)
- CGD Sustainable Funding Framework (as of September 22, 2025)
- CGD Eligibility Criteria (as of September 22, 2025)
- Pre-issuance verification
- Valid as long as the cited Framework remains unchanged

Relevant standards

Scope of verification

Lifecycle Validity

¹ Bonds, Loans, and covered, unsecured, subordinate debt.

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SCOPE OF WORK

Caixa Geral de Depósitos, S.A. (“the Issuer,” “CGD” or “Caixa”) commissioned ISS-Corporate to assist with its sustainable funding instruments by assessing three core elements to determine the sustainability quality of the instruments:

1. CGD’s Sustainable Funding Framework (as of September 22, 2025), benchmarked against the International Capital Market Association’s (ICMA) Green Bond Principles (GBP), Social Bond Principles (SBP), and the Sustainability Bond Guidelines (SBG).
2. The eligibility criteria — whether the project categories contribute positively to the United Nations Sustainable Development Goals (U.N. SDGs) and how they perform against ISS-Corporate’s proprietary issuance-specific key performance indicators (KPIs).
3. Consistency of sustainable funding instruments with CGD’s sustainability strategy, drawing on the key sustainability objectives and priorities defined by the Issuer.

CGD OVERVIEW

Caixa Geral de Depósitos S.A., founded in 1876, is an exclusively state-owned public limited liability company. CGD is one of Portugal's leading banking corporations, offering a full range of financial services to its customers, which include retail, commercial, investment banking, specialized credit, and asset management products and services. The company offers savings, checking, and deposit accounts, personal and business loans, mortgages, credit card issuances, corporate financing, life insurance, and pension funds. It also offers financial advisory, online stock broking, and portfolio management.


ESG risks associated with the Issuer's industry

CGD is classified in the Public & Regional Banks industry, as per ISS ESG's sector classification. Key sustainability issues faced by companies² in this industry are Business ethics, Labor standards and working conditions, Sustainability impacts of lending and other financial services/products, Customer and product responsibility, and Sustainable investment criteria.

This report focuses on the sustainability credentials of the issuance. Part III of this report assesses the consistency between the issuance and the Issuer's overall sustainability strategy.

² Please note that this is not a company-specific assessment but rather areas that are of particular relevance for companies within this industry.

ASSESSMENT SUMMARY

SPO SECTION	SUMMARY	EVALUATION ³
<p>Part I:</p> <p>Alignment with GBP/SBP/SBG</p>	<p>The Issuer has defined a formal concept for its Sustainable Funding Instruments (or 'SFIs') regarding use of proceeds, processes for project evaluation and selection, management of proceeds and reporting. This concept is in line with the GBP, SBP, and SBG.</p>	<p>Aligned</p>
<p>Part II:</p> <p>Sustainability quality of the Eligibility criteria</p>	<p>The Sustainable Funding Instruments will (re)finance the following eligible asset categories:</p> <p>Green categories: Renewable Energy, Energy Efficiency, Green Buildings, and Clean Transportation.</p> <p>Social categories: Employment generation, and programmes designed to prevent and/or alleviate unemployment stemming from socioeconomic crises, including through the potential effect of SME financing and microfinance.</p> <p>Product or service-related use of proceeds categories⁴ individually contribute to one or more of the following SDGs:</p>  <p>The environmental and social risks associated with the use of proceeds categories and the financial institution are managed.</p>	<p>Positive</p>

³ The evaluation is based on the CGD's Sustainable Funding Framework (September 22, 2025), on the analyzed selection criteria as received on September 22, 2025.

⁴ Renewable Energy, Energy Efficiency, Green Buildings, Clean Transportation, and Employment generation, and programmes designed to prevent and/or alleviate unemployment stemming from socioeconomic crises, including through the potential effect of SME financing and microfinance

SPO SECTION	SUMMARY	EVALUATION ³
Part III: Consistency of Sustainable Funding Instruments with CGD's sustainability strategy	The Issuer clearly describes the key sustainability objectives and the rationale for issuing sustainable funding instruments. All the project categories financed are aligned with the Issuer's sustainability objectives.	Consistent with Issuer's sustainability strategy

SPO ASSESSMENT

PART I: ALIGNMENT WITH THE GBP, SBP, SBG

This section evaluates the alignment of the CGD’s Sustainable Funding Framework (as of September 22, 2025) with the GBP, SBP, and SBG.

GBP, SBP, AND SBG	ALIGNMENT	OPINION
<p>1. Use of proceeds</p>	<p>✓</p>	<p>The use of proceeds description provided by CGD’s Sustainable Funding Framework is aligned with the GBP, SBP, and SBG.</p> <p>The Issuer’s green and social categories align with the project categories as proposed by the GBP, SBP, and SBG. The criteria are defined clearly and transparently. Disclosure of an allocation period and commitment to report by project category have been provided. Environmental and social benefits are described and quantified.</p> <p>The Issuer clearly specified the method defined for each secured GSS bond in the Framework and disclosed its criteria to select underlying collaterals.</p>
<p>2. Process for project evaluation and selection</p>	<p>✓</p>	<p>The process for project evaluation and selection description provided by CGD’s Sustainable Funding Framework is aligned with the GBP, SBP, and SBG.</p> <p>The project selection process is defined and structured in a congruous manner. ESG risks associated with the project categories are identified and managed appropriately. Moreover, the projects selected show alignment with the Issuer’s sustainability strategy and clearly show the intended benefit to the relevant population for social projects. The Issuer defines exclusion criteria for harmful project categories.</p> <p>Moreover, the Issuer involves diverse stakeholders in the process and identifies the alignment of official or market-wide taxonomies</p>

GBP, SBP, AND SBG	ALIGNMENT	OPINION
		<p>for the selection criteria of certain sustainable projects, in line with best market practice.</p>
<p>3. Management of proceeds</p>	<p>✓</p>	<p>The management of proceeds provided by CGD’s Sustainable Funding Framework is aligned with the GBP, SBP, and SBG.</p> <p>CGD will strive to ensure net proceeds collected will equal the amount allocated to eligible projects. The net proceeds are tracked appropriately and managed on an aggregated basis for multiple green and social bonds (portfolio approach, separately for green and social sub-portfolios). Moreover, the Issuer discloses the temporary investment instruments for unallocated proceeds.</p> <p>The Issuer has defined an expected allocation period of 24 months and confirmed immediate reallocation in case the allocated assets become ineligible.</p> <p>The risk of double-counting is addressed by CGD, and the Issuer is transparent on the nature of the instruments.</p>
<p>4. Reporting</p>	<p>✓</p>	<p>The allocation and impact reporting provided by CGD’s Sustainable Funding Framework is aligned with the GBP, SBP, and SBG.</p> <p>The Issuer commits to disclose the allocation of proceeds transparently and report with appropriate frequency. The reporting will be publicly available on the Issuer’s website. CGD has disclosed the type of information that will be reported and explains that the level of expected reporting will be at the project category level. Moreover, the Issuer commits to report annually until the bond matures or the proceeds have been fully allocated.</p> <p>The Issuer is transparent on the level of impact reporting and the information reported and</p>

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GBP, SBP, AND SBG	ALIGNMENT	OPINION
		further defines the frequency of the impact reporting. The Issuer also discloses roles and responsibilities in the monitoring and reporting process as well as commits to having the allocation report audited by an external party, in line with best market practices.

PART II: SUSTAINABILITY QUALITY OF THE ELIGIBILITY CRITERIA

A. CONTRIBUTION OF THE SUSTAINABLE FUNDING INSTRUMENTS TO THE U.N. SDGs⁵

The Issuer can contribute to the achievement of the SDGs by providing specific services/products that help address global sustainability challenges, and by being a responsible actor, working to minimize negative externalities in its operations along the entire value chain.


1. Products and services

The assessment of UoP categories for (re)financing products and services is based on a variety of internal and external sources, such as ISS ESG’s SDG Solutions Assessment, a proprietary methodology designed to assess the impact of an Issuer’s products or services on the U.N. SDGs, as well as other ESG benchmarks (the EU taxonomy Climate Delegated Act, the Green/Social Bond Principles and other regional taxonomies, standards and sustainability criteria).

The assessment of UoP categories for (re)financing specific products and services is displayed on a three-point scale:



Each of the Sustainable Funding Instruments’ use of proceeds categories has been assessed for its contribution to or obstruction of the SDGs:





USE OF PROCEEDS (PRODUCTS/SERVICES) ⁶	CONTRIBUTION OR OBSTRUCTION	SUSTAINABLE DEVELOPMENT GOALS
<p>Renewable Energy</p> <p><i>The production and transmission of energy from renewable sources⁷:</i></p> <ul style="list-style-type: none"> ▪ Solar power (photovoltaic and concentrated solar power) ▪ Wind power (onshore and offshore) ▪ Hydropower⁸, where the facility complies with one 	<p>Contribution</p>	





⁵ The impact of the UoP categories on U.N. SDGs is assessed with proprietary methodology and may therefore differ from the Issuer’s description in the Framework.

⁶ The review is limited to the examples of projects spelled out in the Framework.

⁷ Lifecycle GHG emissions lower than 100g CO₂e/kWh.

⁸ Only hydropower plants with a capacity of below 1,000MW will be financed.



USE OF PROCEEDS (PRODUCTS/SERVICES) ⁶	CONTRIBUTION OR OBSTRUCTION	SUSTAINABLE DEVELOPMENT GOALS
<p>of the following:</p> <ul style="list-style-type: none"> ▪ The facility is a run-of-river plant and does not have an artificial reservoir; ▪ the power density of the facility⁷ is above 5W/m²; ▪ Geothermal power 	Contribution	
<p>Renewable Energy</p> <p><i>The production and transmission of energy from renewable sources:</i></p> <ul style="list-style-type: none"> ▪ Bioenergy: Biomass and biofuels using byproducts and perennial grass as feedstock. Food and feed crops are not used for the manufacture of biofuels for use in transport and for the manufacture of bioliquids (with life cycle GHG emissions lower than 100g CO₂e/kWh) 		
<p>Renewable Energy</p> <p><i>The production and transmission of energy from renewable sources:</i></p> <ul style="list-style-type: none"> ▪ Bioenergy: Biomass and biofuels using certified wood. 		
<p>Renewable Energy</p> <p><i>The production and transmission of energy from renewable source⁷:</i></p> <ul style="list-style-type: none"> ▪ Bioenergy: Biogas may include landfill gas, sewage, anaerobic digestion, etc. (with life cycle GHG emissions lower than 100g CO₂e/kWh) 		
<p>Renewable Energy</p> <p><i>Electricity transmission and distribution</i></p> <ul style="list-style-type: none"> ▪ Transmission of electricity produced by renewable 		

USE OF PROCEEDS (PRODUCTS/SERVICES) ⁶	CONTRIBUTION OR OBSTRUCTION	SUSTAINABLE DEVELOPMENT GOALS
<p>sources from the production site to the system grid</p>	<p>Contribution</p>	
<p>Renewable Energy <i>Electricity transmission and distribution</i></p> <ul style="list-style-type: none"> System grids interconnected with the European system 		
<p>Renewable Energy <i>Energy storage⁹ (i.e. thermal energy storage or hydro, batteries)</i></p>		
<p>Energy Efficiency <i>Energy efficient products, technologies and processes including energy efficient equipment for buildings:</i></p> <ul style="list-style-type: none"> Insulation LED lighting Ventilation and air conditioning (HVAC)¹⁰ 		
<p>Energy Efficiency <i>Energy efficient products, technologies and processes including energy efficient equipment for buildings:</i></p> <ul style="list-style-type: none"> Instruments for measuring and controlling the energy performance of buildings such as installation, maintenance and repair of zone thermostats, smart thermostat systems and sensing equipment, including motion and daylight control¹¹ 		

⁹ This category aligns with the Substantial Contribution Criteria for Climate Change Mitigation of the EU Taxonomy activity 4.10.

¹⁰ For instance, Energy Recovery Ventilators (ERV), aimed at improving indoor air quality while conserving energy

¹¹ Smart thermostat systems and sensing equipment.

USE OF PROCEEDS (PRODUCTS/SERVICES) ⁶	CONTRIBUTION OR OBSTRUCTION	SUSTAINABLE DEVELOPMENT GOALS
<p>Green Buildings</p> <p><i>New or existing buildings meeting at least one of the following criteria:</i></p> <ul style="list-style-type: none"> ▪ Buildings built before 31 December 2020¹² with at least an Energy Performance Certificate (EPC) class A or belonging to the top 15% of the national residential or commercial building stock based on Primary Energy Demand (PED) or energy efficiency performance¹³ ▪ Buildings built after 31 December 2020¹⁴ with a PED at least 10% lower than the threshold for Nearly Zero-Energy Buildings (“NZEB”) in the national market, and hold a valid EPC label or with EPC label of at least A 	<p>Contribution</p>	
<p>Green Buildings</p> <p><i>New or existing buildings meeting at least one of the following criteria:</i></p> <ul style="list-style-type: none"> ▪ Buildings meeting at least the following level of certifications: the LEED “Gold”, the BREEAM “Excellent”, HQE “Excellent” or any equivalent certification system (and level) 	<p>Contribution</p>	

¹² Where the building is a large non-residential building (with an effective rated output for heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air-conditioning and ventilation of over 290 kW) it is efficiently operated through energy performance monitoring and assessment.

¹³ Respectively of the national residential or commercial building stock built as of 31st December 2020.


¹⁴ For buildings larger than 5,000 m², upon completion, the building resulting from the construction undergoes testing for airtightness and thermal integrity (in accordance with EN 13187 and EN 13829 or equivalent standards accepted by the respective building control body where the building is located), and any deviation in the levels of performance set at the design stage or defects in the building envelope are disclosed to investors and clients. As an alternative, where robust and traceable quality control processes are in place during the construction process this is acceptable as an alternative to thermal integrity testing. For buildings larger than 5,000 m², the life-cycle Global Warming Potential (GWP) of the building resulting from the construction has been calculated for each stage in the life cycle (in accordance with EN 15978) and is disclosed to investors and clients on demand.

USE OF PROCEEDS (PRODUCTS/SERVICES) ⁶	CONTRIBUTION OR OBSTRUCTION	SUSTAINABLE DEVELOPMENT GOALS
<p>Clean Transport</p> <p><i>Zero direct emissions passenger and public transport, and transport infrastructure financing:</i></p> <ul style="list-style-type: none"> ▪ Passenger or commercial electric vehicles or mopeds and motorbikes with zero tailpipe emissions (electric or hydrogen fuel cell) ▪ Public passenger transport for example buses, train and ferries) with zero tailpipe emissions (electric or hydrogen fuel cell) ▪ Infrastructure for zero direct (tailpipe) CO₂ emissions vehicles, for example train, metro and tram networks ▪ Electric charging and hydrogen fueling stations 	<p>Contribution</p>	
<p>Employment generation, and programmes designed to prevent and/or alleviate unemployment stemming from socioeconomic crises, including through the potential effect of SME financing and microfinance</p> <p><i>Supporting SMEs and microenterprises located in the most socioeconomically disadvantaged areas in Portugal. Via these loans CGD contributes to enhanced business resilience by supporting companies in structurally less competitive territories</i></p> <p>Loans dedicated to the financing of SMEs and microenterprises, meeting the following cumulative three criteria:</p>	<p>Contribution</p>	

USE OF PROCEEDS (PRODUCTS/SERVICES) ⁶	CONTRIBUTION OR OBSTRUCTION	SUSTAINABLE DEVELOPMENT GOALS
<ul style="list-style-type: none"> ▪ Meeting the EU Commission and/or national definition¹⁵ ▪ Subject to negative screening as per Exclusion List section ▪ Located in the most socioeconomically disadvantaged areas in Portugal. Regions defined as areas having an overall Regional Development Composite Index (ISDR)¹⁶ scores below average (<100) and having the Competitiveness factor within the bottom 4th quintiles. <p>Employment generation, and programmes designed to prevent and/or alleviate unemployment stemming from socioeconomic crises, including through the potential effect of SME financing and microfinance</p> <p><i>Promoting female entrepreneurship by lending to SMEs and microenterprises owned or led by women</i></p> <p>Loans dedicated to the financing of SMEs and microenterprises, meeting the following cumulative three criteria:</p> <ul style="list-style-type: none"> ▪ Meeting the EU Commission and/or national definition ▪ Subject to negative screening as per Exclusion List section 	<p>Contribution</p>	

¹⁵ The European Commission defines micro, small and medium-sized enterprises (SMEs) in the EU Recommendation 2003/361. According to this, SMEs have up to 249 employees and an annual turnover not exceeding € 50 million or a balance sheet total not exceeding € 43 million.

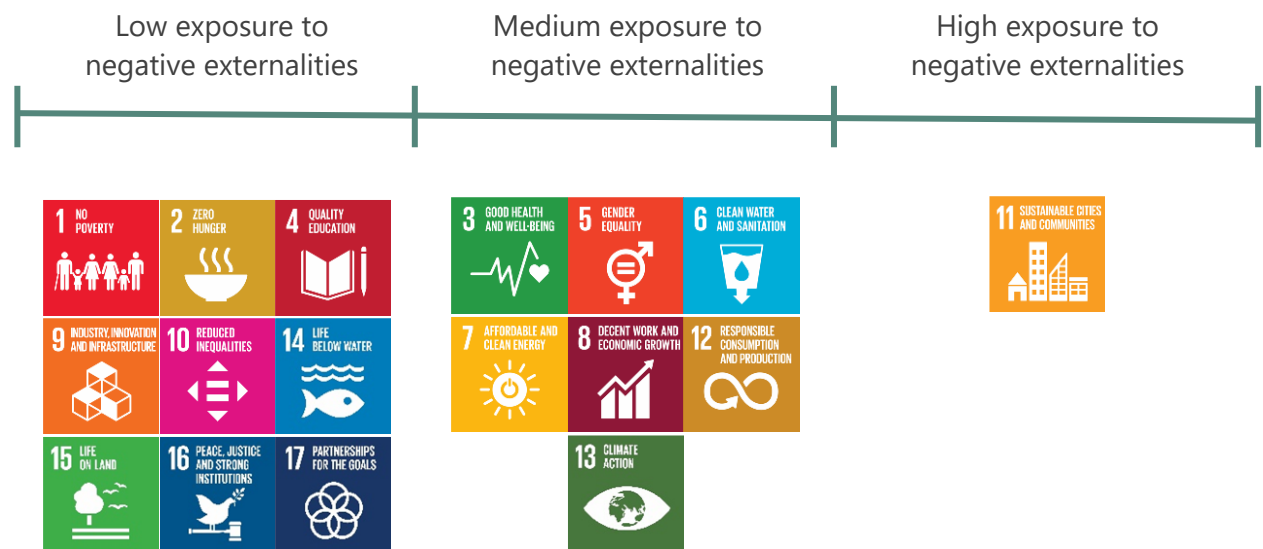
¹⁶ The Regional Development Composite Index (ISDR) was built by the Portuguese National Statistics Institute in partnership with the Ministry of Environment, Physical Planning and Regional Development with the goal of assessing territorial impact of public policies. It is publicly available, and subject to updates. The Index relies on a conceptual framework which benefits from a multidimensional approach to regional development that encompasses three dimensions: competitiveness, cohesion and environmental quality. The Portuguese national average is 100. Within the three dimensions of development, the competitiveness index in revealed the highest regional disparity, according to the coefficient of variation and therefore it is used as additional dimension to assess disparity.

USE OF PROCEEDS (PRODUCTS/SERVICES) ⁶	CONTRIBUTION OR OBSTRUCTION	SUSTAINABLE DEVELOPMENT GOALS
<ul style="list-style-type: none"> ▪ Female-owned (must have majority ownership) <p>Employment generation, and programmes designed to prevent and/or alleviate unemployment stemming from socioeconomic crises, including through the potential effect of SME financing and microfinance</p> <p><i>Supporting SMEs and microenterprises negatively impacted by external events, which are more vulnerable and less resilient to crises and shocks</i></p> <p>Loans dedicated to the financing of SMEs and microenterprises, meeting the following cumulative three criteria:</p> <ul style="list-style-type: none"> ▪ Meeting the EU Commission and/or national definition ▪ Subject to negative screening as per Exclusion List section ▪ Negatively impacted by the consequences of macroeconomic, socioeconomic, political and natural disaster (extreme events) crises 	<p>Contribution</p>	

2. Improvements of operational performance (processes)

The below assessment qualifies the direction of change (or “operational impact improvement”) resulting from the operational performance projects (re)financed by the UoP categories, as well as related SDGs impacted. The assessment displays how the UoP categories mitigate exposure to the negative externalities relevant to the Issuer’s business model and sector.

According to ISS ESG’s SDG Impact Rating methodology, potential impacts on the SDGs related to negative operational externalities in the Real Estate sector, which CGD is financing:



The table below displays the direction of change resulting from the operational performance improvement projects. The outcome displayed does not correspond to an absolute or net assessment of the operational performance.

USE OF PROCEEDS (PROCESSES)	OPERATIONAL IMPACT IMPROVEMENT ¹⁷	SUSTAINABLE DEVELOPMENT GOALS
<p>Green Buildings</p> <p><i>Building renovations meeting at least one of the following criteria:</i></p> <ul style="list-style-type: none"> Resulting in a reduction of PED of at least 30%¹⁸ 		

¹⁷ Only the direction of change is displayed. The scale of improvement is not assessed.

¹⁸ The initial primary energy demand and the estimated improvement is based on a detailed building survey, an energy audit conducted by an accredited independent expert or any other transparent and proportionate method and validated through an Energy Performance Certificate. The 30 % improvement results from a reduction in actual primary energy demand and can be achieved through a succession of measures within a maximum of three years.

USE OF PROCEEDS (PROCESSES)	OPERATIONAL IMPACT IMPROVEMENT¹⁷	SUSTAINABLE DEVELOPMENT GOALS
<ul style="list-style-type: none">▪ Resulting in an increase of efficiency of at least 30%, proxied by an improvement of two levels in EPC labels▪ Meeting the EU criteria for major renovations¹⁹		

¹⁹ As set in the applicable national and regional building regulations for 'major renovation' implementing Directive 2010/31/EU. The energy performance of the building or the renovated part that is upgraded meets cost-optimal minimum energy performance requirements in accordance with the respective directive.

B. MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS ASSOCIATED WITH THE FINANCIAL INSTITUTION AND THE ELIGIBILITY CRITERIA

The table below evaluates the eligibility criteria against issuance-specific KPIs. All the assets are and will be located in Portugal.

ASSESSMENT AGAINST KPIs

Integration of ESG guidelines into the financing process

CGD screens all credit, including project finance, general corporate purpose lending to corporate issuers, and loans under the Framework, against its risk appetite and against the principles of exclusion and limitation. The Issuer checks all loans covered under the Framework to manage any potential environmental and social risk. The risk management approach includes a risk taxonomy, a climate and environmental risk management policy,²⁰ a credit risk policy,²¹ guidelines for “healthy” origination aligned with risk appetite, and exclusion²² and sectoral limitation principles.²³

The risk taxonomy categorizes risks into categories and subcategories. Climate and environmental (C&E) risks are considered level 1 risk category, which refers to low risk situations, along with three subcategories (climate risks from transition events, climate risks from physical events, biodiversity risk and other environmental risks).

The climate and environmental risk management policy establishes the responsibilities of the three lines of defense and specifies the procedures for identifying, assessing, monitoring, and controlling climate and environmental risks.

The credit risk policy details the principles and rules for granting and restructuring credit, including criteria for risk mitigation (guarantees). The policy establishes guidelines for considering ESG ratings in credit decision procedures, the prohibition of financing projects that negatively affect sustainable development, and the restriction of support for projects that use scarce natural resources or cause negative environmental impacts.

The guidelines for 'healthy' origination aligned with risk appetite establish the decision-making process for credit operations, including C&E risks.

An ESG rating model was developed and integrated into the credit decision-making process to characterize CGD's credit portfolio in terms of sustainability, assessing risk levels and integrating components of the three subcategories considered for climate and environmental

²⁰ Climate and environmental risk management policy, [Link](#)

²¹ Regulations of the risk committee of Caixa Geral de Depósitos, S.A., [Link](#)

²² CGD Principles of Exclusion and Limitation, [Link](#)

²³ Market Discipline ESG risks June 2024, [Link](#)

risks. Regarding the social risks, working conditions and workplace safety are included in the rating model.

The climate and environmental risks are managed around a taxonomy-based framework, and it includes 6 steps:

1. Taxonomy and Risk Categorization
2. Risk management lifecycle. A comprehensive risk management cycle including identification, assessment and analysis; mitigation and management; monitoring and reporting; residual risk management
3. Integration into Business Strategy
4. Materiality Assessment
5. Regulatory Compliance
6. Exclusion Criteria

CGD regularly monitors companies' exposure across the levels defined by the ESG rating model and reports this information in the annual sustainability report. When certain risks are deemed too high, Caixa may request additional information or risk mitigants. However, this is not done systematically. Companies with a higher ESG rating benefit from differentiated pricing conditions. If a transaction does not comply with the risk appetite of Caixa or with the exclusions principles, the Issuer will not participate or withdraw from the financing.

Labor, health and safety

All the financed assets are located in Portugal, where high labor, health and safety standards are ensured by both national legislation and mandatory social standards. Caixa is committed to upholding human rights through various initiatives, including the endorsement of the Ten Principles of the UN Global Compact and the Declaration of Commitment to Human Rights.



CGD's ESG rating model includes components covering health and safety, and labor. For example, a component called "Occupational Health and Safety", which ensure the workplace safety is considered in the risk assessment for financed companies. Workplace safety is also addressed through the [principles of exclusion and limitation](#). If a significant risk is found during the risk assessment, additional information or risk mitigants might be requested from the borrowers.

Caixa states that it does not finance projects that may be considered illegal, and paying below minimum wage is considered illegal, therefore, if a company becomes non-compliant with the principles of exclusion and limitation, CGD will take measures to align the situation with the credit policies. The measures could include terminating the business relationship and seeking compensation for any damage incurred, whether tangible or intangible.

Biodiversity

All assets financed are located in Portugal, where high environmental standards are ensured by both national legislation and mandatory regulations.



CGD considers environmental factors in its [sustainability policy](#), including biodiversity and ecosystems protection. In cases of serious controversies, CGD could interrupt the relationship with the borrower. Also, Caixa has established Ethical and Good Business Principles which bind suppliers to comply with legislation and regulations, corporate governance practices, prevention of conflicts of interest and financial crimes, labor obligations, environmental preservation and sustainability.

Community dialogue

All assets financed are located in Portugal, an Equator Principle Designated Country. Thus, the Issuer ensures that its impacts on the communities have been mitigated and reduced in alignment with international regulations for environmental and social impact assessment.



In addition to local legislation, in 2024 CGD conducted an external consultation with 14 stakeholders' groups to gather insights on the Issuer's material impacts on society and the environment. The results contributed to supporting a structured approach to mitigating associated risks.

Inclusion

The Issuer states that the loans provided to borrowers under the Framework will follow an anti-discrimination approach, ensuring fair treatment for all borrowers. CGD's [code of conduct](#) guarantees equal opportunities to customers in accessing loans and banking services. CGD does not discriminate based on ethnicity, sex, gender identity, sexual orientation, religion, creed, culture, nationality, disability, political or ideological orientation, education, or marital status.



Data protection and information security

The Issuer has various policies in place regarding data protection and cybersecurity. [Personal Data Protection and Privacy Policy](#) covers the conditions under which customers' personal data might be collected, processed, shared, and conserved. The Data Protection Regulation sets high-level responsibilities and guidelines for identified stakeholders and aims to operationalize the Personal Data Protection and Privacy Policy.



The Global Cybersecurity Policy,²⁴ based on the cybersecurity and resilience controls and requirements from international references ISO/IEC 27002 and NIST Cybersecurity Framework and the National Cybersecurity Reference Framework (QNRCS), formalizes the strategic definitions approved by the Board of Directors. It also considers the Regulation (EU) 2022/2554 on Digital Operational Resilience Act (DORA).

The Information Classification Policy²⁴ ensures that employees use information appropriately. The policy defines rules, criteria, and responsibilities and it must be followed by every employee.

Information Classification Policy regulated the cybersecurity response, incidents, and vulnerabilities. Also, CGD has held employees' training on Cybersecurity and Information Protection during 2024. The Issuer implemented an Awareness and Training program adapted to the seniority of the employees.

Regarding the outsourcing of data to third parties, CGD's due diligence measures include a pre-assessment of suppliers to ensure compliance with the General Data Protection Regulation (GDPR) and Digital Operational Resilience Act (DORA), contractual clauses to adhere to CGD's internal policies on data protection, agreements in which the suppliers must commit to processing data according to CGD's instructions, periodic audits and reviews, continuous monitoring of ICT risks, and minimum security requirements like data encryption, access control, vulnerability management, and incident response.

Responsible treatment of customers with debt repayment problems

The Issuer has implemented various measures to responsibly deal with clients having debt repayment problems. For example, CGD created a financial literacy portal, "Saldo Positivo", with the goal of increasing financial literacy among the Portuguese.



The Issuer has preemptive actions, like offering follow-ups with customers who have experienced financial difficulties in the context of high interest rates. CGD has a specialized area responsible for monitoring clients with signs of financial difficulty, and clients can contact their branch if they are experiencing financial troubles and get debt counseling. The Issuer confirms that mortgage sale or foreclosure is only done in extreme situations when the negotiation was not possible.

Regarding debt restructuring under non detrimental conditions, for individual and corporate clients, the internal Procedure Manual for Client Classification

²⁴ The policy is outlined in the annual report. [Link](#)

under the Action Plan for Default Risk (PARI) and the Out-of-Court Procedure for Regularizing Default Situations (PERSI) ensure no fees are charged to the clients in relation to renegotiation of contract terms. Additionally, the rules defined by Banco de Portugal, Circular Letter No. [CC/2024/00000033](#), state the prohibition on charging fees for renegotiating the credit, also the prohibition on increasing the interest rate.

Sales practices

CGD's [remuneration policy](#) was designed to prevent conflicts of interests between employees and clients. Employees' remuneration consists of a fixed component and a non-guaranteed variable remuneration component. The variable remuneration is dependent, among other factors, on performance. It is assessed in three dimensions: profitability and risk, commercial performance, and regulatory and sustainability. This ensures that it is not exclusively reliant on quantitative sale targets, it does not promote selling the more profitable products to the detriment of clients.

The Remuneration Committee of the General Meeting (CRAG) is responsible for preparing proposals for the fixed and variable remuneration of statutory body members.



Additionally, training is provided, with training programs including onboarding path for new employees, upgraded programs for customer managers and sales assistants, and employees' certification. The training includes responsible sales, product transparency, information on product cost and risk, no aggressive sales, and products matching the risk appetite of customers.

To ensure product's risk matches the customers', CGD has processes in place to ensure compliance with the defined solvency ratio, considering the purpose and specific conditions of the operation the client aims to finance, the suitability and business, technical and financial capacity of the proponents and the previous relationship with CGD Group. CGD monitors the sales practices and has mystery visits to check the marketing Mortgage Credit and the information given regarding pricing, minimum banking services and the complaints book.

CGD considers customer feedback essential for identifying and implementing improvements. The Issuer monitors evaluation surveys, customers' suggestions and complaints, experience and satisfaction metrics.

Responsible marketing



The Issuer follows the high-level principles on product oversight and governance developed by European Supervisory Authorities (ESAs) in its internal product approval process. During the development of new products,

the customers' interest, objectives and characteristics must be considered, and the product's purpose must be aligned with the customer's goals. CGD's advertising practices follow general principles that include compliance with transparency and information duties, like minimum font sizes, proper highlighting of mandatory legal disclosures, and display of information for enough time to ensure readability and/or audibility. CGD's code of conduct states that the Bank provides clear pricing to its customers, without hidden costs, and offers transparency regarding products' risk. In cases where a loan or insurance is rejected, CGD informs its reason for rejection to its customers, which is the responsibility of the Branch Manager or Account Manager.

Exclusion criteria

The Issuer excludes from its funding under the Sustainable Funding Framework activities related to fossil fuel energy, nuclear energy, gambling, tobacco, alcohol, and weapons. Also, for the sustainable funding instruments, the exclusions from the EU Paris-Aligned Benchmark (PAB) are also applied to the financing.

CGD's [Principles for Exclusion and Sectorial Limitation](#) exclude activity sectors or projects that are deemed to negatively contribute to sustainable development and therefore are excluded or restricted, under certain conditions, from Caixa's credit policy.

CGD does not finance projects that are included in the following categories and/or sectors of activity:

- Production or trade of any product or activity that is illegal in the country where the investment occurs, or under international regulations or agreements, including those that CGD subscribes;
- Companies or projects that use child or forced labor;
- Companies and activities related to prostitution;
- Companies and projects that disseminate discriminatory information or act discriminatorily considering religious, political, racial or gender-based terms;
- Companies and activities with unlicensed wildlife or endangered species.

The Issuer has a policy for the exclusion of entities and individuals found to have engaged in prohibited conduct. CGD's Financial Crime Compliance (FCC) framework sets out systems and controls to prevent financial crimes, including [anti-money laundering, countering the financing of terrorism \(AML/CFT\)](#), [fraud](#), [sanctions violations](#), corruption and market abuse.

PART III: CONSISTENCY OF SUSTAINABLE FUNDING INSTRUMENTS WITH CGD’S SUSTAINABILITY STRATEGY

Key sustainability objectives and priorities defined by the Issuer

TOPIC	ISSUER APPROACH
<p>Core ESG pillars</p>	<p>The Issuer focuses on the following ESG pillars:</p> <ul style="list-style-type: none"> ▪ Supporting the long-term transition to a carbon-neutral economy ▪ Financing projects with a positive impact on society and the environment <p>The following priority areas were identified for the period 2025-2028:</p> <ul style="list-style-type: none"> ▪ Transforming climate and environmental challenges into financing opportunities by ensuring a just and inclusive transition for all; ▪ Strengthening the integration of ESG risk management to increase organizational resilience, mitigate negative environmental impacts and reduce vulnerability to transition and physical climate change risks; ▪ Promoting financial solutions that contribute to increasing client inclusion, financial resilience and satisfaction; ▪ Fostering the development and well-being of employees; ▪ Strengthening the integration of ESG principles into the governance model and fostering a culture of knowledge, transparency and integrity; ▪ Establishing processes and mechanisms to collect, manage and integrate ESG data into analysis and decision-making processes; ▪ Ensuring the disclosures of ESG information are in according with legal and regulatory requirements, supervisors and regulators expectations and best market best practices. ▪ Creating positive impact on the local community.
<p>Definition of core ESG pillars</p>	<p>The ESG pillars of the Issuer have been defined using a double materiality assessment in alignment with the Corporate Sustainability Reporting Directive (CSRD).</p>

TOPIC	ISSUER APPROACH
<p>ESG targets and timeline</p>	<p>To achieve its ESG commitments, the Issuer has set the following targets and timeline.²⁵</p> <ul style="list-style-type: none"> ▪ Reduction of scope 1 and 2 by 42% by 2030 for own operations with a baseline of 2021 ▪ Reduction of 71% by 2030 (tons CO₂eq/MWh) for Electricity Generation (Corporate) with a baseline of 2022 ▪ Reduction of 71% by 2030 (tons CO₂eq/MWh) for Electricity Generation (Project Finance) with a baseline of 2022 ▪ Reduction of 21% by 2030 (tons CO₂eq/ton cement) for Cement manufacturing with a baseline of 2022 ▪ Reduction of 53% by 2030 (tons CO₂eq/m²) for Commercial real estate (Residential segment) with a baseline of 2022 ▪ Reduction of 64% by 2030 (tons CO₂eq/m²) for Commercial Real Estate (Services segment) with a baseline of 2022 <p>The issuer plans to expand the definitions of reduction targets for the three priority sectors at the Group level and to publish reduction targets at the national level for additional sectors.</p>
<p>Science-Based Targets</p>	<p>The Issuer has not verified its targets with the Science-based Target initiative (SBTi)²⁶.</p>
<p>Financial budget to achieve the ESG targets (CapEx, OpEx, Product Mix)</p>	<p>There is no information available on the Issuer’s financial budget to achieve its ESG targets.</p>
<p>Stakeholders involved in decision-making and the implementation and monitoring of the ESG agenda</p>	<p>The following stakeholders are involved in the Issuer's ESG agenda:</p> <ul style="list-style-type: none"> ▪ Board of Directors, responsible for defining the sustainability strategy and policies, establishing internal sustainability governance, approving the strategic plan and budget, ensuring the maintenance of an internal control system and risk management, and ensuring there are procedures to collect and process sustainability information. ▪ Executive Committee, responsible for managing sustainability across CGD Group, ensuring there is a structure dedicated to sustainability, approving policies, and ensuring all employees understand their role in sustainability management.

²⁵ Targets available [here](#).

²⁶ The methodologies used to set the reduction targets are based on SBTi 1.5 climate scenarios for the relevant sector.

TOPIC	ISSUER APPROACH
	<ul style="list-style-type: none"> ▪ Governance Committee, responsible for proposing sustainability guidelines, monitoring the definition and implementation of Corporate Sustainability Strategy, and monitoring initiatives related to Sustainable Finance. ▪ The Sustainability Committee (CSU) acts as an advisory body to the Executive Committee and coordinates information flows on sustainability-related matters. It supports the promotion and implementation of ESG projects.
<p>Industry associations, collective commitments</p>	<p>The Issuer is signatory to/a member of:</p> <ul style="list-style-type: none"> ▪ <i>UNEP-FI Principles for Responsible Banking</i> since 2019. ▪ UN Global Compact and Global Compact Network Portugal (GCNP) ▪ Business Council for Sustainable Development (BCSD) Portugal ▪ Net Zero Banking Alliance <p>For the full list of partnerships, visit the following link.</p>
<p>Sustainability reporting</p>	<p>The Issuer reports on its ESG performance and initiatives annually through its annual report. The report is prepared according to the Corporate Sustainability Reporting Directive (CSRD). The information disclosed follows the European Sustainability Reporting Standards (ESRS). The report is available on the Issuer’s website.</p>
<p>Previously issued sustainable/sustainability-linked issuances or transactions and publication of sustainable financing framework</p>	<p>The Issuer previously issued sustainable instruments and published a sustainable financing framework. In 2021, CGD developed its Sustainable Finance Framework and issued its first sustainable bond, amounting to €500 million, followed in 2022 by two green bond issuances amounting to a total of €800 million.</p>

Rationale for issuance

In 2021, CGD developed its Sustainable Finance Framework to facilitate the issuance of financial instruments with environmental and/or social benefits. The update of the Framework represents the latest step that CGD has taken to ensure its continued positive impact in the sustainable finance space.

SECOND PARTY OPINION

Sustainability Quality of the Issuer
and Sustainable Funding Framework

ISS-CORPORATE 

Opinion: *The Issuer clearly describes the key sustainability objectives and the rationale for issuing sustainable funding instruments. All of the project categories financed are aligned with the Issuer's sustainability objectives.*

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ANNEX 1: QUALITY MANAGEMENT PROCESSES

SCOPE

CGD commissioned ISS-Corporate to compile a Sustainable funding instruments SPO. The second-party opinion process includes verifying whether the Sustainable Funding Framework aligns with the GBP, SBP, and SBG and assessing the sustainability credentials of its Sustainable funding instruments, as well as the Issuer's sustainability strategy.

CRITERIA

Relevant standards for this second-party opinion:

- Green Bond Principles (GBP), as administered by the International Capital Market Association (ICMA) (as of June 2025)
- Social Bond Principles (SBP), as administered by the International Capital Market Association (ICMA) (as of June 2025)
- Sustainability Bond Guidelines (SBG), as administered by the International Capital Market Association (ICMA) (as of June 2021)

ISSUER'S RESPONSIBILITY

CGD's responsibility was to provide information and documentation on:

- Framework
- Eligibility criteria
- Documentation of ESG risk management at the framework level

ISS-CORPORATE'S VERIFICATION PROCESS

Since 2014, ISS Group, which ISS-Corporate is part of, has built up a reputation as a highly reputed thought leader in the green and social bond market and has become one of the first CBI-approved verifiers.

This independent second-party opinion of the Sustainable funding instruments to be issued by CGD has been conducted based on proprietary methodology and in line with the ICMA/LMA GBP, SBP, and SBG.

The engagement with CGD took place from July to September 2025.

ISS-CORPORATE'S BUSINESS PRACTICES

ISS-Corporate has conducted this verification in strict compliance with the ISS Group Code of Ethics, which lays out detailed requirements in integrity, transparency, professional competence and due care, professional behavior and objectivity for the ISS business and team members. It is designed to ensure that the verification is conducted independently and without any conflicts of interest with other parts of the ISS Group.

About this SPO

Companies turn to ISS-Corporate for expertise in designing and managing governance, compensation, sustainability and cyber risk programs that align with company goals, reduce risk and manage the needs of a diverse shareholder base by delivering best-in-class data, tools and advisory services.

ISS-Corporate assesses alignment with external principles (e.g., the Green/Social Bond Principles), analyzes the sustainability quality of the assets and reviews the sustainability performance of the Issuer itself. Following these three steps, we draw up an independent SPO so investors are as well-informed as possible about the quality of the bond/loan from a sustainability perspective.

Please visit ISS-Corporate's [website](#) to learn more about our services for bond issuers.

For more information on SPO services, please contact SPOsales@iss-corporate.com.

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