



Second-Party Opinion Green STORM 2022 Green Bond Framework

Evaluation Summary

Sustainalytics is of the opinion that Obvion’s Green STORM 2022 Green Bond Framework is credible and impactful and aligns with the four core components of the Green Bond Principles 2021. This assessment is based on the following:



USE OF PROCEEDS The eligible category – Green Buildings – is aligned with those recognized by the Green Bond Principles 2021. Sustainalytics considers that investments in the eligible category are expected to improve the energy performance of the Dutch building stock and advance the UN Sustainable Development Goals, specifically SDGs 7 and 11.



PROJECT EVALUATION / SELECTION Obvion’s internal process for evaluating and selecting projects is overseen by a dedicated internal team consisting of representatives from its Funding & Portfolio Management team, Rabobank’s Securitisation & Covered Bonds team and Rabobank’s Sustainable Capital Markets team. Rabobank is Obvion’s parent company. Obvion’s environmental and social risk management processes are applicable to all allocation decisions made under the Framework. Sustainalytics considers these risk management systems to be adequate and the project selection process to be in line with market practice.



MANAGEMENT OF PROCEEDS At the time of issuance, net proceeds from mortgage-backed notes will be allocated in full to refinance eligible loans. Obvion will verify the eligibility of included loans on a monthly basis. Obvion will replace any loan which ceases to comply with the eligibility criteria with an eligible asset. This is in line with market practice.



REPORTING Obvion will publish a monthly report providing loan level data to investors on the mortgages included in the transaction pool. In addition, Obvion will publish information on energy performance certificates of the mortgage assets on a quarterly basis. A third party has been appointed to calculate impact in the form of CO₂ reductions achieved based on real energy consumption, which will be made available to investors at the time of issuance. Sustainalytics views Obvion’s allocation and impact reporting as aligned with market practice.

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For inquiries, contact the Sustainable Finance Solutions project team:

Shreya Garg (Amsterdam)
Project Manager
shreya.garg@sustainalytics.com
(+31) 20 205 0067

Aoife McCarthy (Amsterdam)
Project Support

Javier Frisancho Salinas (Amsterdam)
Project Support

Zoe Wittmann (Amsterdam)
Project Support

Andrew Johnson (Paris)
Client Relations
susfinance.emea@sustainalytics.com
(+44) 20 3880 0193

Introduction

Established in 2002, Obvion N.V. (“Obvion” or the “Company”) is a residential mortgage provider headquartered in Heerlen, the Netherlands. Since 2012, Obvion is a wholly owned subsidiary of Coöperatieve Rabobank U.A. (“Rabobank” or the “Group”), a Dutch multinational banking and financial services company involved in retail and wholesale banking, as well as in food and agribusiness.

Obvion has developed the Green STORM 2022 Green Bond Framework (the “Framework”) under which it intends to issue one or more green residential mortgage-backed bonds and use the proceeds to refinance, in whole or in part, its mortgage portfolio, which is expected to deliver positive environmental impact by improving the energy performance of the building stock in the Netherlands. The Framework follows the 2016, 2017, 2018, 2019 and 2021 Green STORM Green Bond Frameworks which applied to prior issuances under the same programme. The Framework defines eligibility criteria in the following green category:

1. Green Buildings

Obvion engaged Sustainalytics to review the Green STORM 2022 Green Bond Framework, dated March 2022, and to provide a Second-Party Opinion on the Framework’s environmental credentials and its alignment with the Green Bond Principles 2021 (GBP).¹ The Framework has been or will be published in a separate document.²

Scope of work and limitations of Sustainalytics’ Second-Party Opinion

Sustainalytics’ Second-Party Opinion reflects Sustainalytics’ independent³ opinion on the alignment of the reviewed Framework with the current market standards and the extent to which the eligible project categories are credible and impactful.

As part of the Second-Party Opinion, Sustainalytics assessed the following:

- The Framework’s alignment with the Green Bond Principles 2021, as administered by ICMA;
- The credibility and anticipated positive impacts of the use of proceeds; and
- The alignment of the Obvion’s sustainability strategy and performance and sustainability risk management in relation to the use of proceeds.

For the use of proceeds assessment, Sustainalytics relied on its internal taxonomy, version 1.11, which is informed by market practice and Sustainalytics’ expertise as an ESG research provider.

As part of this engagement, Sustainalytics held conversations with various members of Obvion’s management team to understand the sustainability impact of their business processes and planned use of proceeds, as well as management of proceeds and reporting aspects of the Framework. Obvion representatives have confirmed that: (1) they understand it is the sole responsibility of Obvion to ensure that the information provided is complete, accurate and up to date; (2) they have provided Sustainalytics with all relevant information and (3) any provided material information has been duly disclosed in a timely manner. Sustainalytics also reviewed relevant public documents and non-public information.

This document contains Sustainalytics’ opinion of the Framework and should be read in conjunction with that Framework.

Any update of the present Second-Party Opinion will be conducted according to the agreed engagement conditions between Sustainalytics and Obvion.

Sustainalytics’ Second-Party Opinion, while reflecting on the alignment of the Framework with market standards, is no guarantee of alignment nor warrants any alignment with future versions of relevant market standards. Furthermore, Sustainalytics’ Second-Party Opinion addresses the anticipated impacts of eligible projects expected to be financed with bond proceeds but does not measure the actual impact. The measurement and reporting of the impact achieved through projects financed under the Framework is the responsibility of the Framework owner. The Second-Party Opinion is valid for issuances aligned with the

¹ The Green Bond Principles are administered by the International Capital Market Association and are available at <https://www.icmagroup.org/green-social-and-sustainability-bonds/green-bond-principles-gbp/>.

² Rabobank will make the Green STORM 2022 Green Bond Framework available to potential investors at its discretion.

³ When operating multiple lines of business that serve a variety of client types, objective research is a cornerstone of Sustainalytics and ensuring analyst independence is paramount to producing objective, actionable research. Sustainalytics has therefore put in place a robust conflict management framework that specifically addresses the need for analyst independence, consistency of process, structural separation of commercial and research (and engagement) teams, data protection and systems separation. Last but not the least, analyst compensation is not directly tied to specific commercial outcomes. One of Sustainalytics’ hallmarks is integrity, another is transparency.

respective Framework for which the Second-Party Opinion was written for a period of twenty-four (24) months from the evaluation date stated herein.

In addition, the Second-Party Opinion opines on the potential allocation of proceeds but does not guarantee the realized allocation of the bond proceeds towards eligible activities.

No information provided by Sustainalytics under the present Second-Party Opinion shall be considered as being a statement, representation, warrant or argument, either in favour or against, the truthfulness, reliability or completeness of any facts or statements and related surrounding circumstances that Obvion has made available to Sustainalytics for the purpose of this Second-Party Opinion.

Sustainalytics' Opinion

Section 1: Sustainalytics' Opinion on the Green STORM 2022 Green Bond Framework

Sustainalytics is of the opinion that the Green STORM 2022 Green Bond Framework is credible and impactful, and aligns with the four core components of the GBP. Sustainalytics highlights the following elements of Obvion's Green Bond Framework:

- Use of Proceeds:
 - The eligible category – Green Buildings – is aligned with those recognized by the GBP. Sustainalytics notes that net proceeds from bonds issued under the Framework will be used to refinance eligible residential mortgage loans in Obvion's portfolio.
 - The Company may refinance residential buildings which meet one of the following criteria:
 - The acquisition and ownership of residential buildings built before 31/12/2020 that have obtained a definitive energy performance certificate (EPC) of at least 'A'. Sustainalytics considers the methodology used to determine the eligible assets based on construction year and EPC data to be robust and credible.
 - The acquisition and ownership of residential buildings built as of 01/01/2021 that have obtained a definitive energy performance certificate of at least 'A++++' to ensure buildings have a net primary energy demand of at least 10% lower than the requirement for NZEB buildings.⁴ Sustainalytics considers the NZEB requirements to align with market practice.
 - Sustainalytics notes that the above criteria align with the Low Carbon Buildings criteria of the Climate Bonds Standard. Sustainalytics is of the opinion that financing residential buildings which meet the above criteria will contribute to improved energy performance of the Dutch residential building stock.
 - Obvion has previously issued bonds under the Green STORM programme in 2016, 2017, 2018, 2019 and 2021 using an approach similar to the one defined for the issuance under the Framework. In the current case, Obvion has selected a new eligible pool of assets in line with updated EPC data from Calcasa.
- Project Evaluation and Selection:
 - Obvion will match mortgage loans with qualifying EPCs based on data and research from Calcasa, a third-party real estate data provider. The Company has established an internal team which has evaluated and selected loans in line with the Framework's eligibility criteria. The internal team is headed by Obvion's Treasury Manager and comprises representatives from Obvion's Funding and Portfolio Management team, Rabobank's Securitisation and Covered Bonds team and Rabobank's Sustainable Capital Markets team.
 - Obvion adheres to Rabobank's Sustainability Policy Framework to ensure that environmental and social risks associated with all eligible loans have been identified and addressed. Sustainalytics considers these environmental and social risk management systems to be adequate and aligned with market expectation. For additional details, see Section 2.

⁴ As of 01/01/2021, all new buildings in the Netherlands must meet nearly zero-energy building requirements ("Bijna Energieneutrale Gebouwen", BENG). For more information: <https://www.rvo.nl/onderwerpen/duurzaam-ondernemen/gebouwen/wetten-en-regels/nieuwbouw/energieprestatie-beng/indicatoren>

- Based on the use of third-party data to support decision-making, the establishment of a cross-functional team to carry out project selection and the presence of risk management systems, Sustainalytics considers this process to be in line with market practice.
- Management of Proceeds:
 - At the time of issuance, net proceeds from mortgage-backed notes will be allocated in full to refinance eligible loans.
 - Obvion will report on the portfolio monthly for size, repayments, defaults and other factors which may affect the balance of loans outstanding. Obvion will replace any loan which ceases to comply with the eligibility criteria and replace it with an eligible asset. In addition, Obvion will engage an independent external adviser to check whether the: (i) information included in the loan tape of the underlying pool is included in the relevant prospectus, and (ii) mortgage loans included in the loan tape meet the eligibility criteria.
 - Based on the commitment to full allocation at issuance and ongoing tracking, Sustainalytics considers this process to be in line with market practice.
- Reporting:
 - Obvion will provide loan level data to investors on the underlying pool of eligible assets. On a quarterly basis, Obvion will publish information on the EPCs of the properties securing the mortgage loans. Obvion will report yearly on the composition of the mortgages in the transaction pool in terms of compliance with the selection criteria.
 - In addition, Obvion has appointed a third party to calculate the estimated impact of the transaction, in terms of CO₂ reduction achieved based on the real energy consumption of assets, which will be made available to investors at issuance.
 - Based on the commitment to both allocation reporting and impact reporting, Sustainalytics considers this process to be in line with market practice.

Alignment with Green Bond Principles 2021

Sustainalytics has determined that the Green STORM 2022 Green Bond Framework aligns with the four core components of the GBP. For detailed information, please refer to Appendix 2: Green Bond/Green Bond Programme External Review Form.

Section 2: Sustainability Strategy of Obvion

Contribution of the Framework to Obvion's sustainability strategy

Sustainalytics is of the opinion that Obvion demonstrates a commitment to sustainability by incorporating ESG principles into its core business activities and implementing Rabobank's sustainability ambitions and policies. Rabobank's "Sustainability Policy Framework" focuses on four key areas: (i) environment, (ii) human rights, (iii) labour standards, and (iv) anti-corruption.⁵ The Sustainable Policy Framework is applicable to clients in all sectors, products and services, and business partners.

Regarding mortgage lending, Rabobank has implemented sustainability policies for the real estate sector that aim to promote higher energy efficiency, a circular economy, lower greenhouse gas emissions and increase the use of renewable energy in housing and other real estate. Rabobank aims to have an average energy label 'A' for its mortgage portfolio by 2030.⁶ Additionally, Rabobank supports Dutch retail customers in investing in home energy efficiency improvements by acting as a co-financer of the Nationaal Warmtefonds (Dutch National Heat Fund), formerly known as Nationaal Energiebespaarfonds (National Energy Saving Fund).⁷ Established in 2013, the fund operates on behalf of the Dutch government and allows homeowners to invest in energy-saving measures under favourable conditions. The fund aims to implement more than 220,000 energy-saving measures in 90,000 households and educational institutions by 2023.⁸ Rabobank's branches in the Netherlands also organize smart refurbishment meetings where retail customers can meet experts in the field of energy conservation and generation of renewable energy. Furthermore, Rabobank is a signatory to

⁵ Rabobank, "Sustainability Policy Framework", (2020), at: <https://www.rabobank.com/en/images/sustainability-policy-framework.pdf>

⁶ Rabobank, "Duurzaam wonen", at: <https://www.rabobank.nl/over-ons/in-het-kort/waar-we-ons-op-richten/duurzaamwonen>

⁷ Nationaal Warmtefonds, "Over ons", at: <https://www.energiebespaarlening.nl/>

⁸ Ibid.

the Dutch Energy Agreement for Sustainable Growth, a negotiated plan between the government and organizations to boost energy transition through renewable sources.⁹

Obvion and Rabobank aim to fully integrate sustainability into their businesses by 2024, among other initiatives, by adding sustainability criteria into performance management and KPIs for all relevant employees, and by improving the sustainability performance of clients.¹⁰ In order to achieve the latter, since 2020, Obvion offers new and existing borrowers a sustainability discount on the interest rate if the mortgage loan is used to finance an energy-efficient house.¹¹ In addition, through its JobCoach programme, Obvion supports customers having difficulty making their payments with career support.¹² These activities provide evidence that both Obvion and Rabobank are, in Sustainalytics' opinion, well-positioned to issue a green residential mortgage-backed security.

Sustainalytics is of the opinion that the Green STORM 2022 Green Bond Framework is aligned with Obvion's and Rabobank's overall sustainability efforts and will further their action on key environmental priorities.

Well positioned to address common environmental and social risks associated with the projects

Sustainalytics recognizes that the net proceeds from the bond issued under the Framework will be directed towards eligible projects that are anticipated to have positive environmental impact. However, Sustainalytics is aware that such eligible projects could also lead to negative environmental and social outcomes. Some key environmental and social risks associated with the eligible projects could include community relations/stakeholder participation, land use and biodiversity issues associated with large-scale infrastructure development, emissions, effluents, waste generated in construction, and financial risks related to credit and securitization.

Sustainalytics is of the opinion that Obvion is able to manage or mitigate potential risks through implementation of the following Group-level policies:

- Regarding stakeholder participation, Rabobank conducts a materiality analysis on an annual basis to identify and monitor its progress on topics that are most significant to investors, employees, the broader community and customers. The most recent materiality assessment was conducted in 2020 and the results published in the Annual Report for 2020.¹³
- Rabobank has established a Sustainability Policy Framework which outlines its responsible investment policies and guidelines with respect to the credit and loan business, communicating the Group's stance and due diligence process to avoid potential social and environmental risks stemming from the financed projects.¹⁴
- The Group has implemented its Code of Conduct which guides the activities of the Group and its subsidiaries, and forms the basis of internal and external relations.¹⁵ The code relates to business ethics, regulatory compliance and overall social responsibility, and applies to all temporary and permanent staff members, directors and supervisory directors.
- In 2019, Rabobank signed the Principles for Responsible Banking under the United Nations Environment Programme Finance Initiative. This is reflective of the Group's commitment to support projects that enable the transition to a low-carbon, climate-resilient economy required to limit global warming.¹⁶
- As a signatory to the United Nations Global Compact since 2002, Rabobank conforms to its 10 principles, including human rights, labour, environment and anti-corruption, and transparently communicates on its progress on environmental and social targets on an annual basis.¹⁷
- Obvion's carries out its operations in the Netherlands, which is recognized as Designated Country under the Equator Principles, ensuring the presence of robust environmental and social governance, legislation systems and institutional capacity to mitigate the environmental and social risk associated with projects financed under the Framework.¹⁸ Furthermore, Rabobank is an Equator

⁹ Social and Economic Council of the Netherlands (SER), "Energieakkoord voor duurzame groei", (2013), at: <http://www.energieakkoordser.nl/energieakkoord.aspx>

¹⁰ Rabobank, "Sustainability plans 2020 and ambitions 2024", (2020), at: <https://www.rabobank.com/en/images/rabobanks-sustainability-ambitions-2020-2024.pdf>

¹¹ Obvion, "Duurzaamheid", at: <https://www.obvion.nl/Over-Obvion/Duurzaamheid.htm>

¹² Obvion, "Jobcoach", at: <https://www.obvion.nl/Mijn-situatie/Jobcoach.htm>

¹³ Rabobank, "Annual Report 2020", (2021), at: <https://www.rabobank.com/en/images/annual-report-2020.pdf>

¹⁴ Rabobank, "Sustainability Policy Framework", (2020), at: <https://www.rabobank.com/en/images/sustainability-policy-framework.pdf>

¹⁵ Rabobank, "Code of Conduct", (2020), at: <https://rabobank.jobs/content/uploads/2020/04/code-of-conduct-rabobank-en.pdf>

¹⁶ UNEP, "Signatories", at: <https://www.unepfi.org/banking/bankingprinciples/prbnsignatories/>

¹⁷ United Nations Global Compact, "Rabobank Group", at: <https://www.unglobalcompact.org/what-is-gc/participants/7837#company-information>

¹⁸ Equator Principles, "Designated Countries", at: <https://equator-principles.com/about-the-equator-principles/designated-countries/>

Principles Financial Institution since 2003 and reports on project finance transactions with potential environmental and social risks on an annual basis.¹⁹

Based on these policies, standards and assessments, Sustainalytics is of the opinion that Obvion has implemented adequate measures and is well positioned to manage and mitigate environmental and social risks commonly associated with the eligible category.

Section 3: Impact of Use of Proceeds

The use of proceed category is aligned with those recognized by the GBP and is relevant in the local context.

Importance of energy-efficient buildings in the EU and the Netherlands

Buildings are a key contributor to emissions and the largest consumer of energy in the EU.²⁰ The buildings sector is responsible for 40% of the EU energy consumption and 36% of GHG emissions.²¹ Approximately 35% of the buildings in the EU are more than 50 years old and 75% of the building stock is energy inefficient.²² The EU has committed to an emissions reduction target of 55% by 2030 compared to 1990 levels.²³ To achieve this, the EU would need to reduce GHG emissions from buildings by 60%, final energy consumption by 14% and energy consumption from heating and cooling by 18% by 2030 compared to 2015 levels.^{24,25} Therefore, the renovation of buildings to improve energy performance is expected to play a major role in decarbonizing the sector. The European Commission's Renovation Wave strategy aims to double annual energy renovation rates by 2030 from the current weighted average energy renovation rate of 1%.²⁶ In line with these commitments, the Energy Performance of Buildings Directive requires public buildings developed since 2019 and new buildings beginning in 2021 to meet NZEB requirements and EPCs to be issued when a building is sold or rented.²⁷

The Dutch Government has laid out a multi-sectoral approach to reducing greenhouse gas emissions, which is intended to be aligned with the EU's overall climate strategy.²⁸ The 2019 Dutch Climate Act guides the government's efforts to achieve a reduction of 49% GHG emissions by 2030 and 95% by 2050, compared to 1990 levels.²⁹ The construction and housing sector is the source of approximately 13% of emissions in the Netherlands.³⁰ A key initiative to address the sector's emissions is the requirement that all homes, commercial buildings and public buildings receive EPCs when they are being built, sold or rented.³¹ The Government intends to gradually make EPC requirements to obtain building permits more stringent to ensure that new buildings are more efficient. Since 01 January 2021, all new buildings in the Netherlands have to comply with the more recent BENG system,³² which is the Dutch implementation of NZEB and is based on primary annual fossil energy consumption (in kWh/m²) rather than the previous approach, which was based on the energy

¹⁹ Equator Principles, "Members & Reporting", at: <https://equator-principles.com/members-reporting/>

²⁰ European Parliament, "Report on maximizing the energy efficiency potential of the EU building stock", (2020), at: https://www.europarl.europa.eu/doceo/document/A-9-2020-0134_EN.html

²¹ European Commission, "In focus: Energy efficiency in buildings", (2020) at:

https://ec.europa.eu/info/news/focus-energy-efficiency-buildings-2020-feb-17_en

²² European Commission, "New Rules for Greener and Smarter Buildings will increase quality of life for all Europeans", at:

https://ec.europa.eu/info/news/new-rules-greener-and-smarter-buildings-will-increase-quality-life-all-europeans-2019-apr-15_en

²³ European Commission, "Stepping Up Europe's 2030 climate ambition", (2020), at:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0562>

²⁴ European Environment Agency, "Greenhouse gas emissions from energy use in buildings in Europe", at:

<https://www.eea.europa.eu/data-and-maps/indicators/greenhouse-gas-emissions-from-energy/assessment>

²⁵ European Commission, "A Renovation Wave for Europe - greening our buildings, creating jobs, improving lives", at:

https://ec.europa.eu/energy/sites/ener/files/eu_renovation_wave_strategy.pdf

²⁶ European Commission, "Renovation Wave", at: https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/renovation-wave_en

²⁷ European Commission, "Energy performance of buildings directive", at:

https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/energy-performance-buildings-directive_en

²⁸ Government of the Netherlands, "Dutch goals within the EU", at: <https://www.government.nl/topics/climate-change/eu-policy>

²⁹ PBL Netherlands Environmental Assessment Agency, "Climate and Energy Outlook 2021", (2021), at:

https://www.pbl.nl/sites/default/files/downloads/pbl-2021-netherlands-climate-and-energy-outlook_2021-summary-4709.pdf

³⁰ Ibid.

³¹ Government of the Netherlands, "Mandatory EPCs for buildings", at: <https://www.government.nl/topics/energy-performance-certificates-for-homes-and-buildings/mandatory-epcs-for-buildings>

³² BENG (Bijna Energieneutrale Gebouwen) is the Dutch standard that implements nearly zero-energy building requirements in the Netherlands.

index of a property.³³ The Dutch government expects to enhance the energy efficiency of 1.5 million homes by 2030 and reduce average emissions from the sector from 21.6 MtCO_{2e} in 2020 to 19 MtCO_{2e} by 2030.^{34,35}

Based on the above context, Sustainalytics is of the opinion that the asset selection criteria defined by Obvion are aligned with the Dutch government's initiatives to improve energy efficiency in the housing sector and contribute to the overall efforts towards emission reduction.

Alignment with/contribution to SDGs

The Sustainable Development Goals (SDGs) were adopted in September 2015 by the United Nations General Assembly and form part of an agenda for achieving sustainable development by the year 2030. The bond issued under the Green STORM 2022 Green Bond Framework is expected to advance the following SDGs and targets:

Use of Proceeds Category	SDG	SDG target
Green Buildings	7. Affordable and Clean Energy	7.3 By 2030, double the global rate of improvement in energy efficiency
	11. Sustainable Cities and Communities	11.6 By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management

Conclusion

Obvion has developed Green STORM 2022 Green Bond Framework under which it intends to issue a green residential mortgage-backed bond and use the proceeds to refinance its green mortgage portfolio. Sustainalytics considers that the projects funded by the green bond proceeds are expected to deliver positive environmental impact by improving the energy performance of the building stock in the Netherlands.

The Green STORM 2022 transaction outlines a process by for tracking, allocating and managing, and makes commitments for Obvion to report on the allocation and impact of the use of proceeds. Furthermore, Sustainalytics believes that the Green STORM 2022 Green Bond Framework is aligned with the overall sustainability strategy of the company and that the green use of proceeds category will contribute to the advancement of the UN Sustainable Development Goals 7 and 11. Additionally, Sustainalytics is of the opinion that Obvion has adequate measures to identify, manage and mitigate environmental and social risks commonly associated with the eligible projects.

Based on the above, Sustainalytics is confident that Obvion N.V. is well positioned to issue green bonds and that the Green STORM 2022 Green Bond Framework is robust, transparent and in alignment with the four core components of the Green Bond Principles 2021.

³³ Government of the Netherlands, "Energieprestatie – BENG", at: <https://www.rvo.nl/onderwerpen/duurzaam-ondernemen/gebouwen/wetten-en-regels-gebouwen/nieuwbouw/energieprestatie-beng>

³⁴ Government of the Netherlands, "Measures to reduce greenhouse gas emissions", at: <https://www.government.nl/topics/climate-change/national-measures>

³⁵ PBL Netherlands Environmental Assessment Agency, "Climate and Energy Outlook 2021", (2021), at: https://www.pbl.nl/sites/default/files/downloads/pbl-2021-netherlands-climate-and-energy-outlook_2021-summary-4709.pdf

Appendices

Appendix 1: The Framework Selection Methodology

The Framework's selection methodology is based on EPCs as calculated by the Dutch government's methodologies. As of 01/01/2021, a new standard to determine EPCs is used. The Green STORM 2022 transaction can include EPCs that have been issued before or after 31/12/2020. Both methodologies are described as follows:

For EPCs issued before 31/12/2020:

- (i) The calculation methodology version 1.2 ("Rekenmethodiek definitief energielabel inclusief indeling energielabelklassen") of the Netherlands Enterprise Agency ("Rijksdienst voor Ondernemend Nederland" (RVO)) which stated the provisional EPCs and the Energy Index (EI) which was used to determine definitive EPCs; and
- (ii) The Dutch Buildings Directive ("Bouwbesluit")³⁶ which set the Dutch energy performance coefficient requirements for newly built residential houses and which was in line with the European Buildings Directive.

For EPCs issued as of 01/01/2021:

The Dutch government uses a new standard to determine the EPC for newly built houses, "Bijna Energieneutrale Gebouwen" (BENG),³⁷ which is based on NTA 8800 and is compliant with the European Energy Performance of Buildings Directive (EPBD).³⁸ It includes a scale based on BENG requirements which focuses on the energy requirements of a house (BENG 1, 2 and 3) and has replaced the system of energy performance coefficients. They apply to all buildings for which an environmental permit (for the construction of a new building) has been filed after 31 December 2020. The BENG regulation distinguishes three different criteria:

- (i) BENG 1: The maximum energy demand in kWh per square meter on an annual basis;
- (ii) BENG 2: The maximum allowed usage of primary fossil energy per square meter on an annual basis; and,
- (iii) BENG 3: The minimum required percentage of renewable energy that is generated by the property.

The new certificates are provided by accredited real estate certification organizations. It has no effect on EPCs already issued before 01/01/2021, which remain valid for a period of 10 years after issuance. EPCs ranked houses based on their environmental impact with A being the highest and G being the lowest category, where the energy performance coefficient was the minimum environmental standard for newly built residential buildings. All houses and apartments must have an energy label when they are being built, sold or rented. Since January 2021, homeowners that sell their house are obliged to request a definitive EPC, which can only be issued by a certified advisor.

Dutch housing energy performance methodology – comparison between the old and new method

The new standard used from 01/01/2021 onwards will have an impact on both the norms of newly built buildings as well as EPCs issued from 2021 onwards for existing buildings. The new methodology has been calibrated to align with the current distribution of EPCs of the Dutch housing stock. According to the second opinion "Inijking energielabels woningen",³⁹ an EPC issued under the old and new methodology will on average stay the same. Based on their calculations, 53% of the houses would receive the same energy performance certificate, while 21% would receive a one notch improvement and 17% would receive a one notch deterioration. Hence, in total 91% of the EPCs issued under both standards would be within one notch of each other. On average, the total difference is close to 0. As the Green STORM 2022 transaction can include both EPCs issued under the new and old criteria the before mentioned shows that for comparison reasons these on average align to one another.

³⁶ Netherlands Enterprise Agency RVO, "Building regulations", (2021), at: <https://business.gov.nl/regulation/building-regulations/>

³⁷ Rijksdienst voor Ondernemend Nederlands, "Energieprestatie – Beng", (2022), at: <https://www.rvo.nl/onderwerpen/duurzaam-ondernemen/gebouwen/wetten-en-regels/nieuwbouw/energieprestatie-beng>

³⁸ European Commission, "Energy Performance of Buildings Directive", (2022), at: https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/energy-performance-buildings-directive_en

³⁹ INNAX, Rijksdienst voor Ondernemend Nederland, (2020), at: <https://www.rijksoverheid.nl/documenten/publicaties/2019/10/04/advies-inijking-labelklassen-energielabel-op-basis-van-nta-8800-woningbouw-en-utiliteitsbouw>

Identification of houses with a net primary energy demand which is at least 10% lower than the requirement of Nearly Zero Emissions Building (NZEB)

The requirements in the Dutch Buildings Directive (“Bouwbesluit”) as of 01/01/2021 for newly built houses include a maximum primary fossil energy consumption of 50 kWh/m² per year. This translates to a minimum EPC A+++ based on the Energy Performance (Buildings) Regulations (“Regeling energieprestatie gebouwen”). In order to identify the portfolio which has a net primary energy demand which is at least 10% lower than the requirement of the NZEB, a house can have a maximum primary fossil energy consumption of 45 kWh/m² per year. All houses built as of 01/01/2021 that have an EPC of A++++ and those that have an EPC of A+++ and a maximum primary fossil energy consumption of 45 kWh/m² per year are therefore meeting the at least 10% lower than NZEB requirements threshold (please refer to Table 1 below). Obvion applies a conservative approach to this, by focusing on the most energy efficient houses in this category by selecting only those houses that have at least an A++++ certificate. Based on the EPC data as provided by Calcasa, combined with data on the construction year, it is possible for Obvion to identify all houses that have been built since 1 January 2021 and that have at least an EPC label of A++++.

Energy performance certificate	Primary fossil energy consumption (in kWh/m ² .jr)
A++++	<= 0.00
A+++	0.01 – 50.00
A++	50.01 – 75.00
A+	75.01 – 105.00
A	105.01 – 160.00
B	160.01 – 190.00
C	190.01 – 250.00
D	250.01 – 290.00
E	290.01 – 335.00
F	335.01 – 380.00
G	> 380.00

Table 1. EPC mapping based on primary fossil energy performance consumption (as included in the Energy Performance (Buildings) Regulations (“Regeling energieprestatie gebouwen”))

Matching Obvion’s mortgage loans with EPC data

To identify the current EPCs of Obvion’s mortgage pool, Obvion matches the zip codes and addresses of the residential buildings that serve as collateral to the mortgage loans with externally provided EPC data. The data was provided by real estate data provider Calcasa.⁴⁰ Calcasa has provided an overview of the EPCs issued in respect of the properties that secure the relevant mortgage loans. For properties in respect of which definitive EPCs have been issued, Calcasa relied on the information provided by the RVO. Based on the EPC data provided combined with the construction year of the house, it is possible for Obvion to identify this group.

⁴⁰ Calcasa, “About us”, (2022), at: <https://www.calcasa.co.uk/about>

Appendix 2: Green Bond / Green Bond Programme - External Review Form

Section 1. Basic Information

Issuer name:	Obvion N.V.
Green Bond ISIN or Issuer Green Bond Framework Name, if applicable:	Green STORM 2022 Green Bond Framework
Review provider's name:	Sustainalytics
Completion date of this form:	March 18, 2022
Publication date of review publication: Original publication date <i>[please fill this out for updates]</i> :	

Section 2. Review overview

SCOPE OF REVIEW

The following may be used or adapted, where appropriate, to summarize the scope of the review.

The review assessed the following elements and confirmed their alignment with the GBP:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Use of Proceeds | <input checked="" type="checkbox"/> Process for Project Evaluation and Selection |
| <input checked="" type="checkbox"/> Management of Proceeds | <input checked="" type="checkbox"/> Reporting |

ROLE(S) OF REVIEW PROVIDER

- | | |
|---|--|
| <input checked="" type="checkbox"/> Consultancy (incl. 2 nd opinion) | <input type="checkbox"/> Certification |
| <input type="checkbox"/> Verification | <input type="checkbox"/> Rating |
| <input type="checkbox"/> Other <i>(please specify)</i> : | |

Note: In case of multiple reviews / different providers, please provide separate forms for each review.

EXECUTIVE SUMMARY OF REVIEW and/or LINK TO FULL REVIEW *(if applicable)*

Please refer to Evaluation Summary above.

Section 3. Detailed review

Reviewers are encouraged to provide the information below to the extent possible and use the comment section to explain the scope of their review.

1. USE OF PROCEEDS

Overall comment on section *(if applicable)*:

The eligible category for the use of proceeds – Green Buildings – is aligned with those recognized by the Green Bond Principles 2021. Sustainalytics considers that the eligible categories will lead to positive environmental impacts and advance the UN Sustainable Development Goals, specifically SDG 7 and 11.

Use of proceeds categories as per GBP:

- | | |
|---|--|
| <input type="checkbox"/> Renewable energy | <input type="checkbox"/> Energy efficiency |
| <input type="checkbox"/> Pollution prevention and control | <input type="checkbox"/> Environmentally sustainable management of living natural resources and land use |
| <input type="checkbox"/> Terrestrial and aquatic biodiversity conservation | <input type="checkbox"/> Clean transportation |
| <input type="checkbox"/> Sustainable water and wastewater management | <input type="checkbox"/> Climate change adaptation |
| <input type="checkbox"/> Eco-efficient and/or circular economy adapted products, production technologies and processes | <input checked="" type="checkbox"/> Green buildings |
| <input type="checkbox"/> Unknown at issuance but currently expected to conform with GBP categories, or other eligible areas not yet stated in GBP | <input type="checkbox"/> Other <i>(please specify)</i> : |

If applicable please specify the environmental taxonomy, if other than GBP:

2. PROCESS FOR PROJECT EVALUATION AND SELECTION

Overall comment on section *(if applicable)*:

Obvion N.V.'s internal process in evaluating and selecting projects is overseen by a dedicated internal team consisting of representatives from the Funding & Portfolio Management team of Obvion, and the Securitisation & Covered Bonds team and Sustainability Capital Markets teams of Rabobank. The team will select the eligible mortgages, using data provided by real estate data provider Calcasa. Sustainalytics considers the project selection process in line with market practice.

Evaluation and selection

- | | |
|--|---|
| <input checked="" type="checkbox"/> Credentials on the issuer's environmental sustainability objectives | <input checked="" type="checkbox"/> Documented process to determine that projects fit within defined categories |
| <input checked="" type="checkbox"/> Defined and transparent criteria for projects eligible for Green Bond proceeds | <input checked="" type="checkbox"/> Documented process to identify and manage potential ESG risks associated with the project |
| <input type="checkbox"/> Summary criteria for project evaluation and selection publicly available | <input type="checkbox"/> Other <i>(please specify)</i> : |

Information on Responsibilities and Accountability

- Evaluation / Selection criteria subject to external advice or verification In-house assessment
- Other (please specify):

3. MANAGEMENT OF PROCEEDS

Overall comment on section (*if applicable*):

Obvion N.V. will allocate the full amount of net proceeds of the RMBS transaction to refinance eligible assets at the time of closing of the issuance. Obvion will report on a monthly basis on the portfolio regarding size, prepayments, defaults, and losses. Obvion commits to purchasing back any loans which are no longer compliant and substituting any ineligible mortgages. This is in line with market practice.

Tracking of proceeds:

- Green Bond proceeds segregated or tracked by the issuer in an appropriate manner
- Disclosure of intended types of temporary investment instruments for unallocated proceeds
- Other (*please specify*):

Additional disclosure:

- Allocations to future investments only Allocations to both existing and future investments
- Allocation to individual disbursements Allocation to a portfolio of disbursements
- Disclosure of portfolio balance of unallocated proceeds Other (*please specify*):

4. REPORTING

Overall comment on section (if applicable):

Obvion will provide loan level data to investors on the underlying pool of eligible assets. Once a year, Obvion will report on the composition of the mortgages in the transaction pool in terms of compliance with the selection criteria. On a quarterly basis, Obvion will publish information on the EPCs of the properties securing the mortgage loans as part of the ESMA reporting templates. In addition, Obvion has appointed a third-party to calculate the estimated impact of the transaction at issuance, in terms of CO2 reduction achieved based on the real energy consumption of assets, which will be made available to investors. Based on the commitment to both allocation reporting and impact reporting, Sustainalytics considers this process to be in line with market practice.

Use of proceeds reporting:

- Project-by-project On a project portfolio basis

- Linkage to individual bond(s) Other (*please specify*):

Information reported:

- Allocated amounts Green Bond financed share of total investment
- Other (*please specify*):

Frequency:

- Annual Semi-annual
- Other (*please specify*):

Impact reporting:

- Project-by-project On a project portfolio basis
- Linkage to individual bond(s) Other (*please specify*):

Information reported (expected or ex-post):

- GHG Emissions / Savings Energy Savings
- Decrease in water use Other ESG indicators (*please specify*):

Frequency

- Annual Semi-annual
- Other (*please specify*): Quarterly

Means of Disclosure

- Information published in financial report Information published in sustainability report
- Information published in ad hoc documents Other (*please specify*):
- Reporting reviewed (if yes, please specify which parts of the reporting are subject to external review):

Where appropriate, please specify name and date of publication in the useful links section.

USEFUL LINKS (e.g. to review provider methodology or credentials, to issuer's documentation, etc.)

SPECIFY OTHER EXTERNAL REVIEWS AVAILABLE, IF APPROPRIATE

Type(s) of Review provided:

- Consultancy (incl. 2nd opinion) Certification

- Verification / Audit Rating
 Other (*please specify*):

Review provider(s):

Date of publication:

ABOUT ROLE(S) OF INDEPENDENT REVIEW PROVIDERS AS DEFINED BY THE GBP

- i. **Second-Party Opinion:** An institution with environmental expertise, that is independent from the issuer may issue a Second-Party Opinion. The institution should be independent from the issuer's adviser for its Green Bond framework, or appropriate procedures, such as information barriers, will have been implemented within the institution to ensure the independence of the Second-Party Opinion. It normally entails an assessment of the alignment with the Green Bond Principles. In particular, it can include an assessment of the issuer's overarching objectives, strategy, policy and/or processes relating to environmental sustainability, and an evaluation of the environmental features of the type of projects intended for the Use of Proceeds.
- ii. **Verification:** An issuer can obtain independent verification against a designated set of criteria, typically pertaining to business processes and/or environmental criteria. Verification may focus on alignment with internal or external standards or claims made by the issuer. Also, evaluation of the environmentally sustainable features of underlying assets may be termed verification and may reference external criteria. Assurance or attestation regarding an issuer's internal tracking method for use of proceeds, allocation of funds from Green Bond proceeds, statement of environmental impact or alignment of reporting with the GBP, may also be termed verification.
- iii. **Certification:** An issuer can have its Green Bond or associated Green Bond framework or Use of Proceeds certified against a recognised external green standard or label. A standard or label defines specific criteria, and alignment with such criteria is normally tested by qualified, accredited third parties, which may verify consistency with the certification criteria.
- iv. **Green Bond Scoring/Rating:** An issuer can have its Green Bond, associated Green Bond framework or a key feature such as Use of Proceeds evaluated or assessed by qualified third parties, such as specialised research providers or rating agencies, according to an established scoring/rating methodology. The output may include a focus on environmental performance data, the process relative to the GBP, or another benchmark, such as a 2-degree climate change scenario. Such scoring/rating is distinct from credit ratings, which may nonetheless reflect material environmental risks.

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