

**20  
25**

SUSTAINABLE  
FINANCE  
REPORT





# TABLE OF CONTENTS

1. INTRODUCTION.....	1
2. SCOPE OF FCC ENVIRO's SUSTAINABLE FINANCE .....	4
3. KEY FIGURES .....	6
3.1. Issued Green Loans .....	6
3.2. Green Bond Emited in 2024 .....	6
4. SUMMARY OF THE FCC ENVIRO SUSTAINABLE FINANCE FRAMEWORK .....	7
4.1. Eligibles Categories .....	7
5. DEVELOPMENT AND SELECTION OF PROJECTS.....	8
6. EXTERNAL REVIEW .....	8
7. USE OF FUNDS .....	8
8. SUSTAINABILITY BENEFITS.....	10
9. EXAMPLE OF PROJECT FINANCED WITH FCC ENVIRO SUSTAINABLE FINANCE .....	11
9.2. Urban Waste Collection Zaragoza.....	11
9.3. Waste Treatment Centre in Valladolid.....	12
ANNEX 1.....	13

## 1. INTRODUCTION

**FCC Servicios Medio Ambiente Holding** adopted the FCC Enviro trademark during the first half of 2025, reflecting its new corporate identity.

**FCC Enviro** is a global environmental services company specialising in environmental solutions and services with over 115 years of experience, providing essential public services to nearly 60 million people in nearly 5.000 municipalities in 12 countries in Europe and America, including Spain, Portugal, France, United Kingdom, United States, Austria, Slovakia, Czech Republic, Poland, Romania, Hungary and Serbia.

It provides a broad, comprehensive range of services that include:

1. Urban Sanitation Activities: municipal solid waste collection and street cleaning.
2. Management of municipal wastes in waste treatment installations: Separation of the different fractions and preparation for recycling or re-use, composting or biomethanation of organic matter, and landfills for the disposal of unusable waste.
3. Management of municipal wastes in waste treatment installations for energy recovery.
4. Cleaning and maintenance of parks, gardens and green areas
5. Water and wastewater management: cleaning and maintenance services for ornamental fountains and drinking fountains; and sewerage management and maintenance services, as well as industrial cleaning of the urban sanitation network.
6. Energy management, maintenance of installations and energy supply. This activity includes works for the improvement and renovation of the installations, auditing and consultancy and investments required to save energy and the replacement of fossil fuels with renewable energies.
7. Providing the above services using ECO vehicles such as the following:
  - Vehicles powered by Natural Gas, which have the advantage of a drastic reduction of polluting emissions, such as NOx, SOx, particles or noise.
  - Electric Vehicles. Vehicles with Zero emissions, greater energy efficiency and a significant reduction in noise.
  - Hybrid vehicles. These are vehicles equipped with two different energy storage systems on board, with at least one of these energy storages considered to be sustainable (electricity or natural gas).
8. Soil maintenance, refurbishment of contaminated soils and comprehensive management of industrial waste.
9. Cleaning beaches, coast and coastal waters, sanitizing beach sand, as well as the environment and auxiliary elements; and cleaning residues and floating liquids from near-shore waters.
10. Recovery of materials within the framework of the circular economy, which includes:
  - Management of the organic fraction waste separated either at source or by waste classification in treatment plant; for the manufacture of compost, by means of its anaerobic fermentation and subsequent refining and maturation process before dispatch to the end user.
  - Management of tyres at the end of their useful life to obtain new materials.
  - Management of the glass fraction separated at source to obtain end-of-waste glass.



- Management of plastic separated from waste for washing and melting and extrusion, obtaining plastic granules as raw material.
- 11. Green technology innovation, activities that include research, development and/or technological innovation projects in green technologies related with the services and activities in the rest of the fiches.
- 12. Investment in renewable energy, either through construction of renewable energy facilities, generation of energy in these facilities or purchase of energy with a certificate of origin.
- 13. Nature preservation through afforestation, reforestation projects or renaturation of degraded areas and sealed landfills.
- 14. Training and awareness-raising in nature, through environmental education centres.

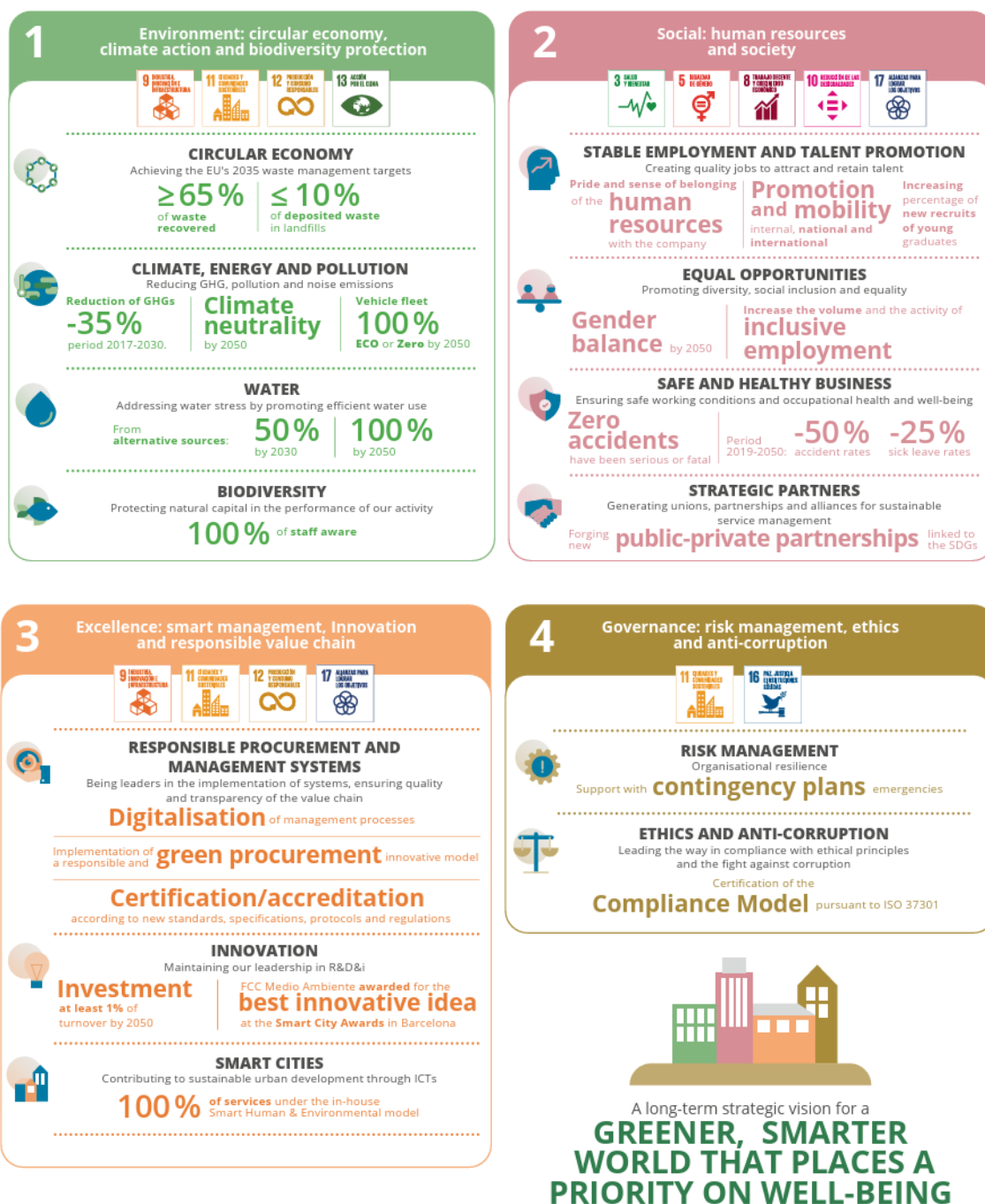
The activities of **FCC ENVIRO** have a direct impact on promoting sustainable development and the health and well being of citizens.

**FCC ENVIRO** has published a climate change strategy in which it establishes objectives for the gradual replacement of conventional vehicles with clean technologies, hybrid or electric vehicles and replacement with waste treatment technologies that avoid landfilling.

During the financial year 2021, FCC SMA published its Sustainability Strategy with a 2050 horizon ([Video-strategy](#)) that has four axes that will mark the company's actions in terms of sustainable management: **Environment, Social, Excellence and Governance**, with objectives specific in each field of activity.



Some of these commitments are:



**FCC ENVIRO** is committed to using the cleanest and most advanced technologies in the provision of high-quality services, sustainable in the medium and long term and adapted to the needs of clients. To achieve this, one of the pillars is technological innovation because of having been pioneers in many aspects of environmental services, developing more sustainable vehicles, using treatment technologies to improve recycling and creating the most comprehensive service management platform in the sector. The improvement of environmental quality is a central objective of the services provided by **FCC ENVIRO**.

For the fourth consecutive year, the Spanish Climate Change Office has awarded **FCC Medio Ambiente** the triple seal "**Calculo-Reduzco-Compensó**" for the carbon footprint of



the year **2023**. In this way, its commitment to reduce greenhouse gas emissions is strengthened. FCC Medio Ambiente is the fifth time that it has obtained “**Reduzco**” seal in a row and the fourth year in which it has obtained the “**Compenso**” seal by signing agreements for the acquisition for absorption rights belonging to reforestation projects. In addition, for the second consecutive year, **FCC Ambito’s** carbon footprint has been verified, obtaining the “**Calculo y Compenso**” seals for the year 2023.

As of the issuance date of this report, **FCC Medio Ambiente** is awaiting the attainment of the triple seals corresponding to the year 2024, as well as the double seals for **FCC Ambito**.



Evolution of **FCC Medio Ambiente’s** carbon footprint 2013\_2023

## 2. SCOPE OF FCC ENVIRO’S SUSTAINABLE FINANCE

**FCC ENVIRO** completed its first green bond framework in November 2019, in accordance with the **Internacional Capital Market Association** (ICMA) **Green Bond Principles published** in 2018. This **FCC ENVIRO** green bond framework was linked to the **United Nations Sustainable Development Goals** (SDG).

Subsequently, FCC ENVIRO issues its first green bond for €1,100 million, divided into two tranches, one of €600 million, maturing in 2023, and another of €500 million maturing in 2026. While the second of these bonds issued, maturing in 2026, was allocated in investments between 2019 and 2021, being fully audited and verified in 2022 together with the first €600 million bond.

Later in 2023, **FCC ENVIRO** updated its framework to cover, in addition to the ICMA Green Bond Principles, the **Loan Market Association** (LMA) Green Loan Principles. Thus, in 2023, **FCC ENVIRO** published its green finance framework.

Subsequently, **FCC ENVIRO** issued a second green bond for a total of €600 million, maturing in October 2029, which was fully audited and verified in the 2024 report with investment data from 2023.

In addition, in 2023 **FCC Medio Ambiente** signed two green loans: one with *Kutxabank* for €50 million, maturing in 39 months; and another with *Cajamar* for €100 million, maturing in 36 months. In October 2024, €25 million of each green loan was canceled, leaving €25 million for the *Kutxabank* loan and €75 million for the *Cajamar* loan. Also in 2023, **FCC Medio Ambiente** signed a one-year green credit facility for €25 million with *Banco Sabadell*.

Later, in 2024 **FCC ENVIRO** issued a new green bond for a total of €600 million, maturing in 2031.

Furthermore, in 2024 **FCC ENVIRO** signed two green loans: one with *BBVA* for €125 million and another with *CaixaBank* for €125 million, both maturing in 36 months. In October 2024,

€50 million of each loan was canceled, leaving €75 million for the *BBVA* loan and €75 million for the *CaixaBank* loan.

The issuance of this bond allows funds to be allocated to projects in activities with a positive impact on the environment, financing projects related to the following categories from among those defined in the framework:

- **Pollution prevention and control:** Collection, transfer, transport, storage, treatment, elimination, classification and recovery of waste; street cleaning, soil decontamination; WtE facilities; landfills and industrial waste treatment plants.
- **Energy Efficiency:** Energy efficiency in contracts for road lighting, lighting of public buildings, traffic lights, public fountains, etc
- **Clean transporter:** Fleet of electric, hybrid and natural gas vehicles.
- **Circular Economy and adapted products:** Compositing, glass recovery and tyre recovery plants; recycled or reconditioned materials, components and products; circular tools and services.
- **Sustainable water and wastewater management:** Wastewater management and sustainable maintenance of urban sewerage; and cleaning and maintenance of ornamental fountains and drinking water.
- **Conservation of terrestrial and aquatic biodiversity:** cleaning of beaches and coasts, cleaning of coastal waters and management of environmental education centres.

This annual **FCC ENVIRO** Green Bond allocation report is made available to the public, detailing the allocation of the net proceeds of any pending issuance. In addition, it provides information on the expected environmental impacts of eligible ecological projects, choosing indicators based on the availability of relevant data.



### 3. KEY FIGURES

#### 3.1. Issued Green Loans

CajaMar	
Borrower	FCC Medio Ambiente, S.A.U
Issue Date	1st December 2023
Madurity Date	1st December 2026M (36 months)
Nomimal Amounts	EUR 100,000,000
Prepayment	EUR 25,000,000 - October 2024
Outstanding nominal amount	EUR 75,000,000
Kutxabank	
Borrower	FCC Medio Ambiente, S.A.U
Issue Date	15th December 2023
Madurity Date	15th March 2027 (39 months)
Nomimal Amounts	EUR 50,000,000
Prepayment	EUR 25,000,000 - October 2024
Outstanding nominal amount	EUR 25,000,000
Banco Sabadell	
Borrower	FCC Medio Ambiente, S.A.U
Issue Date	6th May 2024
Madurity Date	6th May 2025
Nomimal Amounts	EUR 25,000,000
BBVA	
Borrower	FCC Servicios Medio Ambiente Holding, S.A.U.
Issue Date	4th June 2024
Madurity Date	4th June 2027 (36 months)
Nomimal Amounts	EUR 125,000,000
Prepayment	EUR 50,000,000 - October 2024
Outstanding nominal amount	EUR 75,000,000
CaixaBank	
Borrower	FCC Servicios Medio Ambiente Holding, S.A.U.
Issue Date	4th June 2024
Madurity Date	4th June 2027 (36 months)
Nomimal Amounts	EUR 125,000,000
Prepayment	EUR 50,000,000 - October 2024
Outstanding nominal amount	EUR 75,000,000

#### 3.2. Green Bond Emited in 2024

Issuer	FCC Servicios Medio Ambiente Holding, S.A.U.
Issuer Rating	BBB (stable) by Fitch
Format	Bearer Global Notes, RegS, Senior Unsecured
Nominal Amounts	EUR 600,000,000
Issue Date	8th October 2024
















Maturity Date	8th October 2031 (7 Years)
Coupon	3.715% (Annual, Fixed Rate, Actual/Actual ICMA)
ISIN	XS2905583014
Listing	Euronext Dublin, Global Exchange Market
Paying & Fiscal Agent	The Bank of New York Mellon, London Branch







## 4. SUMMARY OF THE FCC ENVIRO SUSTAINABLE FINANCE FRAMEWORK

### 4.1. Eligibles Categories

Eligible Green Projects are those projects that are financed, totally or partially, and directly or indirectly by **FCC ENVIRO**. They will include investment expenses and operating expenses, to that extent that the expense provides clear environmental benefits and promotes the transition to low-carbon technologies.

The following are the categories to which the projects deemed eligible have been assigned.

Eligible Category	UN SDG	Examples of projects
<b>Pollution prevention and control</b>	   	<ul style="list-style-type: none"> <li>- Solid Urban Waste Collection</li> <li>- Street Cleaning Tasks</li> <li>- Management of urban waste at treatment and sorting facilities.</li> <li>- Management of the organic fraction to produce biogas</li> <li>- Landfill management after separation of usable fractions</li> <li>- Energy recovery of waste</li> <li>- Industrial waste management and sorting</li> </ul>
<b>Sustainable water and wastewater management</b>	   	<ul style="list-style-type: none"> <li>- Cleaning of the sewerage network</li> <li>- Maintenance of the sewerage network</li> <li>- Cleaning and maintenance of fountains</li> </ul>
<b>Circular economy adapted products</b>	  	<ul style="list-style-type: none"> <li>- Management of the organic fraction of urban waste for the manufacture of compost</li> <li>- Management of end-of-life tyres to obtain new materials</li> <li>- Management of the glass fraction to obtain end-of-waste glass</li> </ul>

Eligible Category	UN SDG	Examples of projects
Energy Efficiency		<ul style="list-style-type: none"> <li>- Energy management of all facilities and energy supply</li> <li>- Maintenance of all installations.</li> <li>- Improvement and renovation work on energy installations</li> <li>- All auditing and consultancy work necessary for the correct management of the energy supply</li> </ul>
Clean Transportaion	  	<ul style="list-style-type: none"> <li>- Cleaning and maintenance of parks, gardens and green areas</li> <li>- Waste collection and cleaning beaches and coasts</li> <li>- Cleaning of coastal waters of waste and floating liquids</li> </ul>
Environmentally sustainable management of living natural resources and land use	 	<ul style="list-style-type: none"> <li>- Cleaning and maintenance of parks, gardens and green areas</li> <li>- Waste collection and cleaning beaches and coasts</li> <li>- Cleaning of coastal waters of waste and floating liquids</li> </ul>

## 5. DEVELOPMENT AND SELECTION OF PROJECTS

**FCC ENVIRO** has established a Green Bond Working Group (GBWG) to undertake the evaluation and selection process.

The GBWG meets at least twice year to review the projects to which funds have been allocated from the green bonds and loans, to verify their compliance with the Green Bond Framework and approve the allocation of these funds. The GBWG also reviews fund management and the submission of reports.

## 6. EXTERNAL REVIEW

**FCC ENVIRO** contracted an external entity to provide a review in the form of a Second Party Opinion of **FCC ENVIRO's** Sustainable Finance Framework to confirm its alignment with the Green Bond Principles guidelines. This report is published at <https://www.fccma.com/es/>.

In addition, **FCC ENVIRO** is also committed to contracting an external entity to assess the compliance of the bonds issued regarding the Framework. This report will also be made public on <https://www.fccma.com/es/>.

## 7. USE OF FUNDS

The funds collected are included in **FCC ENVIRO** “cash pooling” system and are subsequently distributed to those subsidiaries that have already implemented or will implement projects aimed at improving environmental performance (both new investments and refinancing projects).



It is important to mention that projects that are considered eligible, often consist of the provision of services whose final objective is the achievement of environmental improvement, such as selective waste collection and street cleaning. In order to achieve these environmental improvements, not only vehicles and machinery are required but also work centres (installations) and utensils, such as containers, waste bins, etc. so in these cases all the investment made for the provision of these services is considered eligible: installations, vehicles, machinery, containers, etc.

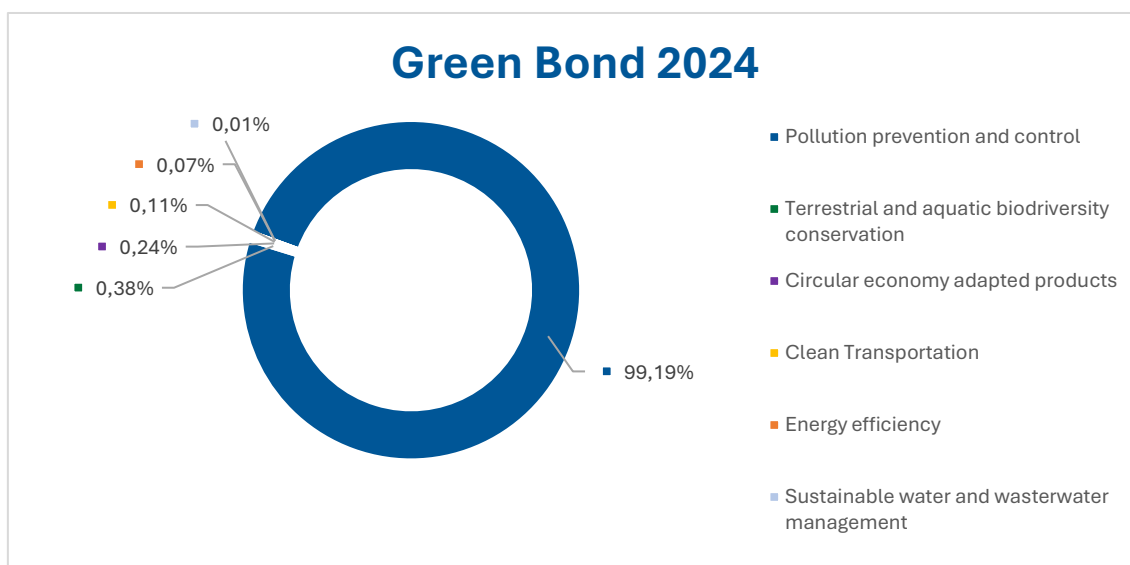
For the allocation of investment corresponding to the year 2024, the unused proportional share from the United Kingdom in 2023 has been taken into account and incorporated into the new green bond.

The table below shows the data for eligible investments by category until 2024:

CATEGORY	INVESTMENT (€)	%
Pollution prevention and control	765,294,228	99,19%
Energy efficiency	2,908,372	0,38%
Clean Transportation	1,857,974	0,24%
Terrestrial and aquatic biodiversity conservation	869,640	0,11%
Sustainable water and wastewater management	514,665	0,07%
Circular economy adapted products	104,148	0,01%
<b>TOTAL</b>	<b>771,549,029</b>	<b>100%</b>

During 2024, a sustainable financing issuance (credits, loans and green bond) was carried out for a total amount of **€875,000,000**. As of the preparation date of this report, **€771,549,029** has been allocated, leaving a remaining allocation for the next fiscal year of **€ 103,450,971**.

**99,19%** of the investments in sustainable finance in 2024 have been allocated to the category of pollution prevention and control.



## 8. SUSTAINABILITY BENEFITS

In 2024, the projects financed with the green bond achieved the following results in terms of the environmental impact of our activities:

IMPACT INDICATORS	Financial year 2.024	
	U	Datum
<b>Total waste tons collected</b>	t	6.082.000
<b>Inhabitants served</b>	Hab	38.018.000
<b>Waste tons treated<sup>1</sup></b>	t	8.984.000
<b>Total GHG emissions avoided by MSW treatment</b>	tCO <sub>2</sub> e	3.761.334,6
<b>Total direct GHG emissions avoided</b>	tCO <sub>2</sub> e	3.538.142,34
Direct GHG emissions avoided by capturing biogas from landfills	tCO <sub>2</sub> e	984.333,19
Direct GHG emissions avoided by biological treatment	tCO <sub>2</sub> e	1.981.082,76
Direct GHG emissions avoided by retrieval of materials	tCO <sub>2</sub> e	572.726,40
<b>Indirect GHG emissions avoided</b>	tCO <sub>2</sub> e	223.192,31
<b>Area of green areas maintained</b>	Ha	5.508,7
<b>Amount of waste removed from sewage networks</b>	t	11.497,39
<b>Renewable Guarantee of Origin energy consumption in 2019</b>	kWh	8.950.439
<b>Number of ECO vehicles</b>	u	3.531
Percentage share of ECO vehicles in FCC MA fleet	%	20,3
<b>Industrial Waste tons Treated</b>	t	637.800

<sup>1</sup> Total tons treated excluding those treated from industrial waste.



9. EXAMPLE OF PROJECT FINANCED WITH FCC ENVIRO SUSTAINABLE FINANCE


9.2. Urban Waste Collection Zaragoza

7 AFFORDABLE AND CLEAN ENERGY

11 SUSTAINABLE CITIES AND COMMUNITIES

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

13 ACCIÓN POR EL CLIMA



- Total investment contract: **€10,920,644 €**
- Impact Indicators:

Impact Indicators		Financial year 2.024	
Indicator	U	Dato	
Total waste tons collected	t	222.317	
Inhabitants served	Hab	682.513	
Number of vehicles	u	351	
Percentage share of ECO vehicles in the total fleet	%	49%	





9.3. Waste Treatment Centre in Valladolid

7

AFFORDABLE AND CLEAN ENERGY

11

SUSTAINABLE CITIES AND COMMUNITIES

12

RESPONSIBLE CONSUMPTION AND PRODUCTION

13

ACCIÓN POR EL CLIMA

- Total investement contract: **€22,686,055**
- Impact indicartor

Impact Indicator		Financial year 2.024	
Indicator	U	Datum	
Total tons waste treated	t	191.216	
Inhabitants served	Hab	484.592	
Number of vehicles	u	1	
Percentage share of ECO vehicles in the total fleet	%	0,04	



## ANNEX 1





FCC SERVICIOS MEDIO AMBIENTE HOLDING SAU

PERIODIC REVIEW REPORT ON GREEN BONDS AND  
LOANS 2025



**Document title:** Periodic review report on green bonds and loans of FCC Servicios Medio Ambiente Holding SAU

**Prepared by:** DNV Business Assurance Spain S.L.U

**Location:** Madrid, Spain.

**Date:** 18/12/2025

**Project number:** PRJN-868750

TABLE OF CONTENTS

INDEPENDENT ASSESSMENT BY DNV ..... 3

Scope and objectives ..... 3

Responsibilities of FCC ENVIRO and DNV management ..... 4

Basis for DNV's opinion ..... 4

Work performed ..... 4

DNV conclusions and opinion ..... 6

Annex 1. Description of nominated activities financed with the financial instruments issued by  
FCC ENVIRO in 2024. .... 8

Annex 2. Contributions to the UN SDGs ..... 9

Annex 3. Eligibility Assessment Protocol ..... 10

**Disclaimer**

Our assessment is based on the premise that the data and information provided to us by the client as part of our review procedures are provided in good faith. Due to the selective nature (sampling) and other limitations inherent in both the procedures and internal control systems, there remains an unavoidable risk that errors or irregularities, possibly significant, may not be detected. Depending on the scope of the work, a limited depth of evidence gathering, including investigation and analysis procedures, and limited sampling at lower levels of the organisation was applied. DNV expressly disclaims any liability or joint liability for any decision that a person or entity may make based on this Statement.

**Statement of competence and independence**

DNV applies its own management standards and compliance policies for quality control, in accordance with ISO/IEC 17029:2019 - Conformity assessment - General principles and requirements for validation and verification bodies, and consequently maintains a comprehensive quality control system, including documented policies and procedures relating to compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. We have complied with the DNV Code of Conduct during the assessment and maintain independence where required by relevant ethical requirements.

## INDEPENDENT ASSESSMENT BY DNV

### Scope and objectives

FCC Servicios Medio Ambiente Holding (hereinafter "FCC ENVIRO") is a Spanish business group and one of the largest environmental services companies in the world, operating as a wholly owned subsidiary of Fomento de Construcciones y Contratas, S.A., an integrated and diversified group listed on the Spanish Continuous Market since 1911. It is listed on the Spanish Continuous Market and for a time its shares were part of the IBEX 35. FCC ENVIRO provides municipal and integrated waste management services to more than 60 million people in 5,000 municipalities in 12 countries in Europe and America, including Spain, Portugal, France, the United Kingdom, the United States, Austria, Slovakia, the Czech Republic, Poland, Romania, Hungary and Serbia.

FCC ENVIRO has developed a Green Financing Framework (hereinafter, the "Framework" or "GFF"). The Framework allows for the issuance of green bonds, green loans and other financing instruments used for the development, construction and operation of eligible assets and projects. The Framework is consistent with the stated Standards and Principles (collectively, the "Principles and Standards"):

- ICMA Green Bond Principles (GBP) 2021 (with the June 2022 Appendix)
- LMA Green Loan Principles (GLP) 2023

During 2024, under the GFF, FCC Enviro received five loans from different Spanish banks for a total amount of €275 million, and issued a green bond with ISIN: XS2905583014 for a nominal value of €600 million, maturing in 2031. Hereinafter, we refer to this mobilisation as "green financial instruments/products".

FCC ENVIRO has used the net proceeds from the BOND and the loans to finance projects and nominated assets related to the following categories, among those described in the Framework:

- Pollution prevention and control.
- Conservation of terrestrial and aquatic biodiversity.
- Circular economy and adapted products.
- Clean transport.
- Energy efficiency.
- Sustainable water and wastewater management.

DNV Business Assurance Spain SLU ("DNV") has been commissioned by FCC ENVIRO to conduct a Periodic Review of the 2025 SUSTAINABLE FINANCE REPORT, with respect to the allocation of funds, as at 31 December 2024, and to provide a Second Party Review Opinion, based on the Principles and Standards.

The Periodic Review was conducted on the information provided by FCC ENVIRO in November 2025.

Our methodology for achieving this is described below in the section entitled "Work performed". We were not engaged to perform an independent audit or other audit activities. No assurance is provided regarding the impact report, the financial results of the BOND and the LOANS, the value of any investment in the BOND and the LOANS, or the long-term environmental and/ t benefits of the transactions. Our objective has been to assess whether the BOND and LOANS have met the criteria set out below.

## **Responsibilities of FCC ENVIRO and DNV management**

The management of FCC ENVIRO has provided the information and data used by DNV in conducting this review. Our statement represents an independent opinion and is intended to inform the management of FCC ENVIRO and other parties interested in the BOND and LOANS as to whether they comply with the Principles and Standards. In our work, we have relied on the information and facts presented to us by FCC ENVIRO. DNV is not responsible for any aspect of the nominated assets referred to in this opinion and cannot be held liable if the estimates, findings, opinions or conclusions are incorrect. Therefore, DNV shall not be liable if any of the information or data provided by the management of FCC ENVIRO and used as the basis for this assessment is incorrect or incomplete.

## **Basis for DNV's opinion**

We have adapted our assessment methodology to create the FCC ENVIRO-specific Eligibility Assessment Protocol (hereinafter, the "Protocol"). Our Protocol includes a set of appropriate criteria that can be used to support DNV's opinion.

According to our Protocol, the criteria against which the Framework has been reviewed are grouped into four basic components:

### **1. Use of Funds**

The criteria for use of funds are governed by the requirement that the issuer of a bond or the borrower of a loan must use the funds raised to finance, refinance or repay the principal of eligible activities. Eligible activities must produce clear environmental and social benefits.

### **2. Project assessment and selection process**

The project evaluation and selection criteria are governed by the requirement that the issuer of a bond or the borrower of a loan describe the process it follows to determine the eligibility of an investment made with the proceeds of a green bond or loan and describe the impact objectives it will take into account.

### **3. Revenue management**

The revenue management criteria are governed by the requirements that a bond/loan be tracked within the organisation, that separate portfolios be created where necessary, and that a statement be made on how unallocated funds will be managed.

### **4. Reporting**

The reporting criteria are guided by the recommendation that the use of proceeds be reported at least annually and that quantitative and/or qualitative performance indicators be used, where feasible.

No guarantee is given regarding the financial performance of instruments issued through the Framework, the value of potential investments, or the long-term environmental benefits of the transaction. Our objective has been to provide an assessment of whether the Framework has met the established criteria on the basis set out below.

## **Work performed**

Our work consisted of a high-level review of the available information, based on the understanding that such information was provided to us by FCC ENVIRO in good faith. We have not conducted an audit or other tests to verify the accuracy of the information provided to us. The work performed to form our opinion included:

Periodic verification:

- Evaluation of documentary evidence provided by FCC ENVIRO on the BOND, supplemented by high-level documentary research, review of documentation and interviews with key personnel of the Issuer FCC ENVIRO. These checks refer to current best assessment practices and standard methodology.
- Discussions with FCC ENVIRO management and review of relevant documentation.
- Review of the nominated projects and assets described in Annex 1 at the time of the Periodic Verification.
- Documentation of the results of the Periodic Verification detailed in this document.

Our opinion, detailed below, is a summary of these conclusions.



## DNV conclusions and opinion

DNV's conclusions on compliance with the Principles and Standards are listed below

### 1. Use of funds

FCC ENVIRO has reported the use of funds as at 31 December 2024 to finance and refinance projects and assets with a total value of €771.55 million, included in the eligible categories defined in Annex 1:

DNV reviewed the criteria for the above project categories to determine the eligibility of the proposed projects and assets.

DNV's assessment concluded that these assets meet the requirements for inclusion in the Green Bond Principles and Green Loan Principles, within the categories mentioned above.

### 2. Project evaluation and selection process

The funds from the green financial instruments/products have been allocated exclusively to the financing and refinancing of eligible assets, as defined in Annex 1. DNV has reviewed evidence of the application of the eligibility criteria defined in FCC ENVIRO's GFF, and evidence that FCC ENVIRO regularly assesses opportunities for improvement and develops action plans and initiatives to mitigate the negative environmental impacts of its operations.

DNV concludes that FCC ENVIRO has issued these instruments in accordance with the GFF, and that the project evaluation and selection process has been applied consistently with the criteria set out in the Principles and Standards.

### 3. Fund Management

DNV has reviewed the evidence demonstrating how FCC ENVIRO controls the funds from financial instruments, from the moment of issue to the moment of disbursement. All funds are managed through treasury or equivalent and subsequently disbursed in accordance with debt obligations. The funds raised have been incorporated into the FCC Group's cash pooling system and subsequently distributed to the subsidiaries of FCC Servicios Medio Ambiente Holding to finance eligible projects aimed at improving environmental performance (both new investments and project refinancing). At the end of 2024, the outstanding balance of unallocated resources amounted to €103.45 million. As indicated above, DNV does not offer any guarantee regarding the financial performance of the instruments, the value of any investment in the Bond or the effects of the transaction.

DNV confirms that the processes for monitoring the income and allocations of these financial instruments to designated projects comply with the Principles and Standards.

### 4. Reports

FCC ENVIRO has published a 2025 Sustainable Finance Report that includes impact and fund allocation reports as at 31 December 2024. This includes a description of the project categories and the value of the funds invested, as well as the associated qualitative and quantitative environmental impacts. DNV notes that the allocation of funds from financial instruments issued and fully disbursed in years prior to 2024 has not been included in the 2025 Sustainable Finance Report.

DNV has only performed an assessment of the allocation report. DNV does not provide any assurance on the associated quantitative and qualitative environmental impacts.

DNV concludes that FCC ENVIRO has issued these instruments in accordance with the GFF and that the allocation reporting process is consistent with the criteria set out in the Principles and Standards.

Based on the limited assurance procedures performed, nothing has come to our attention that causes us to believe, in all material respects, the projects of the reviewed green financial instruments/products do not meet the criteria for use of funds and allocation information described in FCC ENVIRO's Green Finance Framework.

**For DNV Business Assurance Spain, S.L.U.**

Madrid, Spain / 18 December 2025



Juan Andrés Salido  
Head of Sustainable Finance Assurance  
**Quality Reviewer**



















Lars Appel  
Senior Sustainable Finance Consultant  
**Lead Verifier**

**Annex 1. Description of nominated activities financed with the financial instruments issued by FCC ENVIRO in 2024.**

Eligible green project categories	Investment
	as at 31 December 2024
Pollution prevention and control	765,294,228
Conservation of terrestrial and aquatic biodiversity	2,908,372
Circular economy and adapted products	1,857,974
Clean transport	869,640
Energy efficiency	514,665
Sustainable water and wastewater management	104,148
TOTAL	771,549,029

## Annex 2. Contributions to the UN SDGs

Eligible project categories	UN SDGs	DNV conclusions
Pollution prevention and control	   	DNV is of the opinion that the eligible category described in the Framework contributes to the achievement of the UN SDGs.
Conservation of terrestrial and aquatic biodiversity		
Circular economy and adapted products	  	
Clean transport	  	
Energy efficiency		
Sustainable water and wastewater management	   	

## Annex 3. Eligibility Assessment Protocol

### 1. Use of funds

Ref.	Criteria	Requirements	DNV conclusions
1a	Type of bond/loan	<p>The bond/loan must fall into one of the following categories, as defined in the Principles and Standards:</p> <ul style="list-style-type: none"> <li>• Green use bond</li> <li>• Green proceeds bond</li> <li>• Green project bond</li> <li>• Securitised green bond</li> <li>• Loan instrument made available to a green project (green use of loan funds)</li> </ul>	<p>The reviewed evidence confirms that:</p> <ul style="list-style-type: none"> <li>- the BOND falls within the category of Green Bond for Use of Funds.</li> <li>- LOANS are instruments for the green use of funds</li> </ul>
1b	Green projects	<p>The cornerstones of Green Bonds and Loans are the use of the proceeds from the bonds or loans, which must be adequately described in the legal documentation for the security.</p>	<p>The funds have been used to finance and refinance credit lines for projects that fall into the following categories, as indicated in the GFF:</p> <ul style="list-style-type: none"> <li>- Pollution prevention and control</li> <li>- Conservation of terrestrial and aquatic biodiversity</li> <li>- Circular economy and adapted products</li> <li>- Clean transport</li> <li>- Energy efficiency</li> <li>- Sustainable water and wastewater management</li> </ul> <p>DNV's assessment concluded that these assets meet the requirements for inclusion in the Green Bond Principles and Green Loan Principles, within the categories mentioned above.</p>
1c	Environmental benefits	<p>All designated categories of Green Projects must provide clear sustainable environmental benefits, which, where feasible, will be quantified or assessed by the Issuer.</p>	<p>DNV reviewed the eligibility and exclusion criteria for activities and projects</p> <p>DNV considers that all activities and projects provide clear environmental benefits.</p>
1d	Refinancing quota	<p>Where a portion of the proceeds may be used for refinancing, issuers are recommended to provide an estimate of the proportion of financing versus refinancing and, where applicable, also clarify which investments or project portfolios may be refinanced.</p>	<p>It has been reported that the funds from the financial instruments, as indicated below, have been allocated to refinance the assets of the nominated projects listed in Annex 1.</p>

## 2. Project selection and evaluation process

Ref.	Criteria	Requirements	DNV conclusions
<b>2a</b>	Investment decision process	<p>The Issuer of a Green Bond and Loan must describe the decision-making process it follows to determine the eligibility of projects that use Green Bond and Loan funds. This includes, without limitation:</p> <ul style="list-style-type: none"> <li>• The environmental objectives of eligible green projects;</li> <li>• The process by which the issuer determines how projects fit into the categories of eligible Green Projects; and</li> <li>• Supplementary information on the processes by which the issuer identifies and manages the perceived environmental and social risks associated with the relevant project or projects.</li> </ul>	<p>In accordance with FCC ENVIRO's GFS, the issuer has established a Green Financing Working Group (GFWG) to carry out the process of evaluating and selecting eligible projects and activities in accordance with the established eligibility criteria.</p> <p>DNV confirmed that this process has been carried out to define a clear and repeatable system by which projects can be identified and included or excluded from the set of Green Financing projects (Green Financing Register).</p>
<b>2b</b>	Issuer's environmental and governance framework	<p>Issuers are also encouraged to:</p> <ul style="list-style-type: none"> <li>• Place relevant information in the context of the issuer's overall objectives, strategy, policy and/or processes relating to environmental sustainability.</li> <li>• Provide information, where applicable, on the suitability of projects for official or market taxonomies and the corresponding subsidy criteria.</li> <li>• Have a process in place to identify mitigating measures for known material risks of negative environmental and/or social impacts of the relevant project or projects.</li> </ul>	<p>DNV reviewed FCC ENVIRO's Environmental and Sustainability Policy and Sustainability Reporting Framework for FCC ENVIRO and its subsidiary organisations.</p> <p>Based on the evidence reviewed and our discussions with senior management, we found nothing to suggest that FCC ENVIRO's environmental, social and governance framework is not in line with good practice in the sector in which it operates.</p>



### 3. Revenue management

Ref.	Criteria	Requirements	DNV conclusions
3a	Monitoring procedure	<ul style="list-style-type: none"> <li>(BONDS) Net proceeds from Green Bonds must be paid into a sub-account, transferred to a sub-portfolio or otherwise tracked by the Issuer in an appropriate manner and evidenced by a formal internal process that will be linked to the Issuer's lending and investment operations for Green Projects.</li> <li>(Loan) Proceeds from Green Loans must be paid into a specific account or tracked by the borrower in an appropriate manner in order to maintain transparency and promote product integrity. Where a green loan takes the form of one or more tranches of a credit facility, each green tranche or tranches must be clearly designated, and the proceeds of the green tranche or tranches must be paid into a separate account or be subject to appropriate monitoring by the borrower.</li> </ul>	<p>DNV has reviewed evidence demonstrating how FCC ENVIRO tracked the proceeds of the bonds from the time of issue to the time of disbursement. The total amount of the funds is managed within the treasury or equivalent and then disbursed in accordance with the debt obligation. The funds raised have been incorporated into the FCC Group's cash pooling system and subsequently distributed to FCC ENVIRO's subsidiaries to finance eligible projects aimed at improving environmental performance (both new investments and project refinancing).</p> <p>DNV confirms that the processes for tracking the proceeds and allocations of these financial instruments to designated projects comply with the Principles and Standards.</p>
3b	Tracking procedure	While the Green Bonds or Loans are outstanding, the balance of tracked proceeds must be reduced periodically by the amounts corresponding to eligible green investments or loan disbursements made during that period.	The reviewed evidence shows that FCC ENVIRO has tracked the funds from the time of issue to the time of disbursement and has reduced the net balance of the instruments in amounts consistent with the asset debt repayment schedule. As at 31 December 2024, the allocated funds amount to EUR 771.55 million, and the balance of funds pending allocation was EUR 103.45 million.
3c	Temporary holdings	Pending such investments or disbursements to eligible Green Projects, the Issuer must disclose to investors the types of temporary investment instruments planned for the balance of unallocated proceeds.	The balance of funds pending allocation as at 31 December 2024 was EUR 103.45 million.

## 4. Reports

Ref.	Criteria	Requirements	DNV conclusions
4a	Periodic reports	<ul style="list-style-type: none"> <li>• Issuers must provide and keep readily available up-to-date information on the use of proceeds, which will be updated annually until the allocation is complete, and promptly in the event of significant changes.</li> <li>• The annual report should include a list of the projects to which Green Bond proceeds have been allocated, as well as a brief description of the projects, the amounts allocated and their expected impact.</li> <li>• Where confidentiality agreements, competitive considerations or a large number of underlying projects limit the amount of detail that can be made available, the GBP recommends that the information be presented in generic terms or on an aggregate portfolio basis (e.g. percentage allocated to certain categories of projects).</li> </ul>	<p>FCC ENVIRO has published a 2025 Sustainable Finance Report that includes impact and fund allocation reports as at 31 December 2024. This includes a description of the project categories and the value of the funds invested, as well as the associated qualitative and quantitative environmental impacts. DNV notes that the allocation of funds from financial instruments issued and fully disbursed in years prior to 2024 has not been included in the 2025 Sustainable Finance Report.</p> <p>DNV has only performed an assessment of the allocation report. DNV does not provide any assurance on the associated quantitative and qualitative environmental impacts.</p> <p>DNV concludes that FCC ENVIRO has issued these instruments in accordance with the GFF and that the reporting process is consistent with the criteria set out in the Principles and Standards.</p>



WHEN TRUST MATTERS

#### **About DNV**

Driven by our purpose to safeguard life, property and the environment, DNV enables organisations to advance the safety and sustainability of their business. Combining leading technical and operational expertise, risk methodology and deep industry knowledge, we empower our customers' decisions and actions with confidence and assurance. We continuously invest in collaborative research and innovation to provide customers and society with an operational and technological vision of the future. With origins dating back to 1864, our reach is now global. Present in more than 100 countries, our 16,000 professionals are dedicated to helping customers make the world a safer, smarter and greener place. All rights reserved.