

## **Barclays Bank PLC**

#### PROGRAMMATIC POST-ISSUANCE VERIFICATION LETTER

# WIND ENERGY, SOLAR ENERGY, LOW CARBON BUILDINGS CRITERIA OF THE CLIMATE BONDS STANDARD

Type of engagement: Assurance Engagement Period engagement was carried out: June 2024 Approved verifier: Sustainalytics Contact address for engagement: De Entrée 35-37 – 1101 BH, P.O. Box 22703 – 1100 DE, Amsterdam, The Netherlands Post-Issuance Engagement: Akshay Chandrakapure, akshay.chandrakapure@morningstar.com, Nachiket Goli, nachiket.goli@morningstar.com

#### Scope and Objectives

Between 2021 and 2022, Barclays Bank PLC ("Barclays" or the "Bank") issued green structured notes (the "Barclays Green Structured Notes") to finance or refinanced low-carbon buildings, renewable energy generation projects. In 2024, Barclays engaged Sustainalytics to review the projects financed with proceeds from the Barclays Green Structured Notes (the "Nominated Projects") and provide an assessment as to whether the Nominated Projects meet the Post-Issuance Requirements of the Climate Bonds Standard Version 4.0.<sup>1</sup>

The Nominated Projects include:

- Wind Energy
  - The generation of electricity from wind energy
- Solar
  - The generation of electricity from solar energy
- Low Carbon Buildings
  - Energy-efficient residential buildings in the UK that are among the top 15% of buildings in terms of carbon intensity.

Schedule 1 provides details of the Nominated Projects and disbursement of proceeds.

#### Post-Issuance Evaluation Criteria

Post-issuance Requirements of the Climate Bonds Standard Version 4.0:

- Use of Proceeds
- Evaluation and Selection of Projects, including conformance with the relevant Sector Criteria
  - Wind Energy<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> Climate Bonds Initiative, Climate Bonds Standard Version 4.0, at: <u>https://www.climatebonds.net/files/files/CBI\_Standard\_V4.pdf</u>

<sup>&</sup>lt;sup>2</sup> Climate Bonds Initiative, Wind energy Criteria, at: <u>https://www.climatebonds.net/standard/wind</u>

- Solar Energy<sup>3</sup>
- Low carbon buildings<sup>4</sup>
- Management of Proceeds
- Reporting

#### **Issuing Entity's Responsibility**

Barclays is responsible for providing accurate information and documentation relating to the details of projects, including description, total development cost of each project and disbursed amounts.

#### Independence and Quality Control

Sustainalytics, a leading provider of ESG and corporate governance research and ratings to investors, conducted the verification of the Barclays Green Structured Notes to provide an independent opinion on its conformance with the Post-Issuance Requirements of the Climate Bonds Standard.

Sustainalytics has relied on the information and the facts presented by Barclays with respect to the Nominated Projects. Sustainalytics is not responsible nor shall be held liable for any inaccuracies in the opinions, findings or conclusions herein due to incorrect or incomplete data provided by Barclays.

Sustainalytics makes all efforts to ensure the highest quality and rigor during its assessment process and enlisted its Sustainability Bonds Review Committee to provide oversight over this assessment.

#### Verifier's Responsibility

Sustainalytics conducted the verification in accordance with the Climate Bonds Standard Version 4.0 and with International Standard on Assurance Engagements 3000 (ISAE 3000).

The work undertaken as part of this engagement included conversations with relevant Barclays employees and review of relevant documentation to assess conformance of the Barclays Green Structured Notes with the Post-Issuance Requirements of the Climate Bonds Standard Version 4.0.

#### Exceptions

No exceptions were identified. All projects meet the Post-Issuance Requirements of the Climate Bonds Standard Version 4.0 and the Wind energy, Solar energy, Low carbon buildings criteria.

#### Conclusion

Based on the limited assurance procedures conducted and evidence obtained, nothing has come to Sustainalytics' attention that causes us to believe that, in all material respects, the Barclays Green Structured Notes are not in conformance with the Post-Issuance Requirements of the Climate Bonds Standard.

<sup>&</sup>lt;sup>3</sup> Climate Bonds Initiative, Solar energy Criteria, at: <u>https://www.climatebonds.net/standard/solar</u>

<sup>&</sup>lt;sup>4</sup> Climate Bonds Initiative, Low Carbon Buildings Criteria, at: <u>https://www.climatebonds.net/standard/buildings</u>

# Schedule 1: Overview of Nominated Projects

Project	Sub- category	Location	Impact Indicator	Amount Allocated (GBP) <sup>5</sup>
Project 1	Wind energy	India	Generation capacity: 762 MW	801,591
	Solar energy		Generation capacity: 910 MW	
Project 2	Wind energy Solar energy	United Kingdom	Generation capacity: 1,200 MW	17,966,921
Project 3			Generation capacity: 1,200 MW	13,901,565
Project 4			Generation capacity: 1,200 MW	5,767,563
Project 5			Generation capacity: 1,140 MW	16,660,359
Project 6			Generation capacity: 448 MW	12,423,855
Project 7			Generation capacity: 142 MW	3,986,904
Project 8			Generation capacity: 566 MW	7,999,642
Project 9	Low carbon buildings	United Kingdom	Energy Performance Certificate Rating: B	8,742,497
Total Amount Allocated (GBF	88,250,897			

<sup>&</sup>lt;sup>5</sup> Sustainalytics notes that the amounts have been allocated on pro-rata basis.

# Schedule 2: Conformance to the Post-Issuance **Requirements of the Climate Bonds Standard**<sup>6,7</sup>

Requirement	Factual	Factual Findings		
	3.1.1	A list of Nominated Projects is provided in Schedule 1.		
	3.1.2	The Nominated Projects meet the documented objectives of the Green Structured Notes and are in conformance with the Sector Criteria requirements of the Climate Bonds Standard.		
A.3.1. Use of Proceeds	3.1.3	The net proceeds have been allocated to Nominated Projects and assets within 24 months of issuance of the Green Structured Notes.		
	3.1.4	See 3.1.9 below.	None	
	3.1.5	Barclays confirms that the Nominated Projects have not been nominated to other Certified Climate Bonds, Certified Climate Loans, Certified Climate Green Structured Notes, green bonds, green loans or other labelled instruments (such as social bonds or SDG bonds).		
	3.1.6	Barclays confirms that it has tracked the share of the net proceeds used for financing and refinancing.		
	3.1.7	Barclays documents that the net proceeds are tracked following a formal internal process.		
	3.1.8	Barclays has confirmed that the net proceeds raised are no greater than the total investment exposure or debt obligation to the Nominated projects or the relevant proportion of the total Market Value of the Nominated projects which are owned or financed by the issuer.		
A.3.2. Process for Evaluation and Selection of Projects and Assets	3.2.1	Barclays established a decision-making process which it uses to determine the continuing eligibility of the Nominated Projects. This includes, without limitation:		
	i.	A statement on the climate-related objectives of the Green Structured Notes;		
	ii.	How the climate-related objectives of the Green Structured Notes are positioned within the context of Barclays's overarching goals, strategy, policy and/or processes relating to environmental sustainability;	None	
	iii.	Barclays's rationale for issuing the Green Structured Notes;		

<sup>&</sup>lt;sup>6</sup> Climate Bonds Initiative, Climate Bonds Standard Version 4.0, at: <u>https://www.climatebonds.net/files/CBI\_Standard\_V4.pdf</u> <sup>7</sup> For ease of reference, the numbering in this section follows the numbering of the Climate Bonds Standard Version 4.0.

	iv. v.	A process to determine whether the Nominated Projects meet the eligibility requirements specified in the Climate Bonds Standard; Other information provided by Barclays as		
	3.3.1	described in Clause A.2.2. Barclays confirmed that net proceeds of the Green		
A.3.3. Management of Proceeds	5.5.1	Structured Notes were earmarked through Barclays internal capacity or otherwise identified by Barclays in an appropriate manner and documented.	Nece	
	3.3.2	Barclays confirmed that it maintained an earmarking process to manage and account for allocation of net proceeds to the Nominated Projects.		
	3.3.3	Barclays has confirmed that while the financing remained outstanding, the balance of the tracked net proceeds were reduced by amounts allocated to Nominated Projects. Pending allocation, the net proceeds were maintained by Treasury as cash or cash equivalents according to Barclays' liquidity policy.	None	
A.3.4. Reporting – Post-issuance	3.4.1	Barclays is committed to preparing an update report at least annually while the financing remains outstanding.	None	
	3.4.2	Barclays is committed to providing an update report on a timely basis in case of material developments.		
	3.4.3	The update report will be made available through existing debt market reporting channels and to the Climate Bonds Standard Board.		
	3.4.4	Barclays is committed to including allocation reporting, eligibility reporting, and impact reporting in its update report		
	3.4.5	Barclays will provide update reports annually to bondholders, lenders or other stakeholders, or make the reports available to the public, for as long as the Green Structured Notes remains outstanding.		

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