



Second Party Opinion Concerning Barclays Green Issuance Framework, July 2021

Date 23/07/2021



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The External Reviewer’s Opinion

Terms of Engagement and Scope

Carbon Trust Assurance Limited (the “External Reviewer”) has been commissioned by Barclays PLC Group (“Barclays”) as an independent external reviewer to provide a Second Party Opinion (“SPO”) on the alignment of the Barclays Green Issuance Framework, July 2021 (the “Issuer Framework”), with the International Capital Markets Association’s (“ICMA”) ‘Green Bond Principles, Voluntary Process Guidelines for Issuing Green Bonds’ (“GBP”) (June 2021), as contemplated by the ICMA ‘Guidelines for Green, Social, Sustainability and Sustainability-Linked Bonds External Reviews’ (February 2021). Under the Issuer Framework, Barclays PLC, Barclays Bank PLC, Barclays Bank UK PLC and Barclays Bank Ireland PLC are each an “Issuer” and together “Barclays” under the Issuer Framework.

The Issuer Framework provides a forward-looking framework for issuing green finance instruments, including: green bonds, green covered bonds, green commercial paper, green structured notes and green index-linked notes (together “Green Issuances”).

In order to provide this SPO, the External Reviewer reviewed relevant documents and held conversations with Barclays’ management to understand the Use of Proceeds, Process for Project Evaluation and Selection, Management of Proceeds, and Reporting aspects of its proposed Green Issuances against the Issuer Framework, as well as the sustainability strategy of Barclays as a whole.

No opinion or assurance is provided regarding the financial performance of the Green Issuances or the value of any investments in the Green Issuances, or any asset deriving value from the Green Issuances issued against the Issuer Framework. The External Reviewer’s objective has been to provide an opinion on whether the Green Issuances issued against the Issuer Framework meet the criteria described in the basis of opinion set out below.

Carbon Trust Second Party Opinion Statement

Aligns with ICMA GBP Core Components and Key Recommendations (June 2021)

Based on the work undertaken and the evidence provided by Barclays, the External Reviewer believes that the Issuer Framework and the related Procedures (as defined below) comply with the core principles and *key recommendations* of the ICMA GBP (2021):

- Core component: Use of Proceeds
- Core component: Process for Project Evaluation and Selection
- Core component: Management of Proceeds
- Core component: Reporting
- Key recommendation: Green Bond Frameworks
- Key recommendation: External Reviews

This SPO shall be read in the context of the 'Basis of the Second Party Opinion', the inherent limitations of the 'Procedures', the respective responsibilities of the parties to the 'Second Party Opinion Statement', and this statement's intended use.

A handwritten signature in black ink, appearing to read "Hugh Jones".

Hugh Jones, Managing Director,
Carbon Trust Assurance Limited

23.07.2021



Carbon Trust Assurance Limited, London
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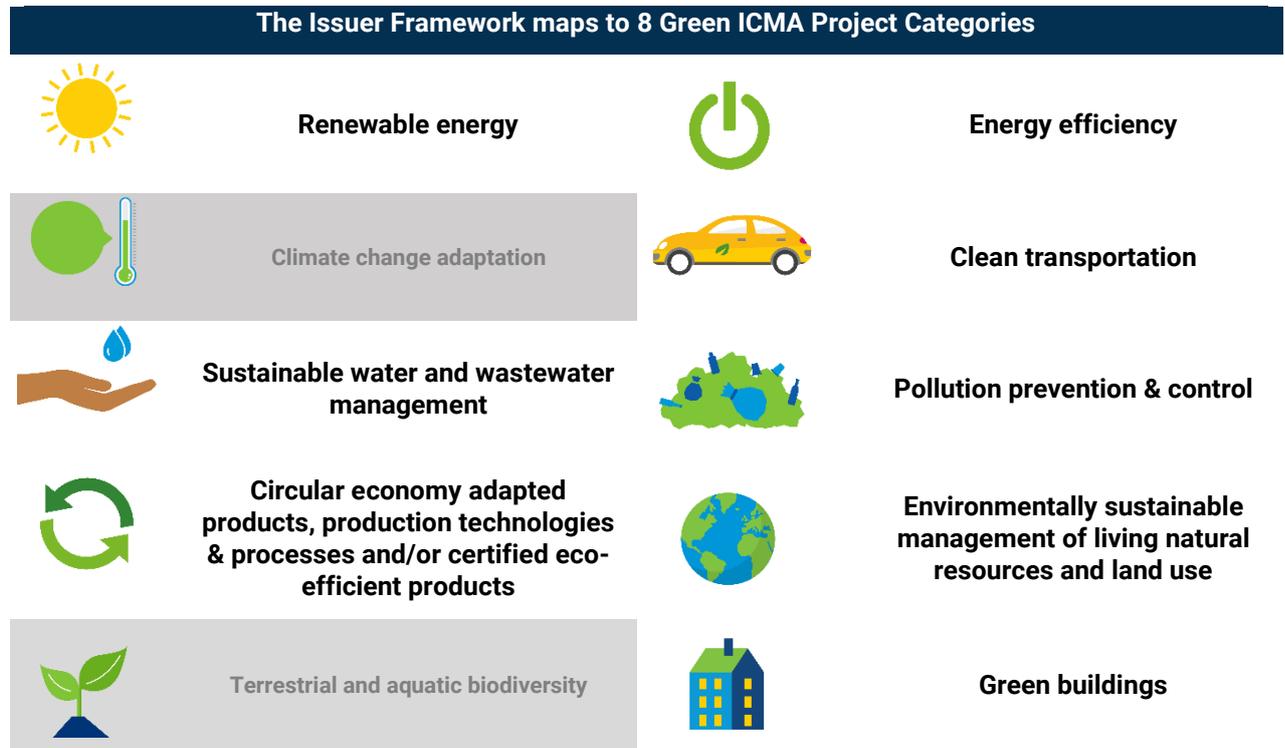
This second opinion statement ("Opinion") is given by Carbon Trust Assurance Limited ("CTA") and is addressed solely to Barclays in accordance with the terms of the engagement contract between us and Barclays. Those terms permit disclosure to other parties (whether by publication on the website of the International Capital Markets Association Green Bond Resource Centre (the "GBRC") or otherwise), solely for the purpose of enabling Barclays to show that it has obtained a second opinion as contemplated by the GBP in connection with the Green Issuances. We have not considered the interest of any other party in the Opinion. To the fullest extent permitted by law, we accept no responsibility and deny any liability to any other party for our work, for this statement or for the conclusions we have reached. CTA will not accept any form of liability for the substance of the Opinion and/or any liability for damage arising from the use of the Opinion and/or the information provided in it. As the Opinion is based on information made available by Barclays, CTA does not warrant that the information presented in this Opinion is complete, accurate or up to date. Nothing contained in this Opinion shall be construed as to make a representation or warranty, express or implied, regarding the advisability of investing in any securities or any asset whose value is derived from any securities. Any person other than Barclays who obtains access to the Opinion or a copy thereof and chooses to rely on it will do so at its own risk. Furthermore, this Opinion shall in no event be interpreted and construed as an assessment of the economic performance and credit worthiness of Barclays or the Green Issuances. The issuance(s) and the performance of Barclays and the Green Issuances is outside the scope of this engagement. We have consented to the inclusion of the Opinion on the GBRC or in such other manner as ICMA shall from time to time use for making second opinions rendered in respect of Green Issuances available to the public. We reserve the right to withdraw such consent at any time.

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Summary of Key Findings

Summary Characteristics of Barclays Green Issuance Framework (June 2021)



The Issuer Framework maps 3 ICMA Environmental Objectives

Climate change mitigation	Climate change adaptation	Natural resource conservation
Biodiversity conservation	Pollution prevention & control	Other

Look back period: Maximum of 36 Months

Impact metrics:

- Carbon avoided
- Carbon intensity per £m invested

Geography: Global, with a focus in Barclays' core markets, including UK

[Link](#) to documents relating to the Framework and future issuances.

Alignment with ICMA Green Bond Principles (June 2021)

Core Components

This section summarises the key results of the External Review¹ concerning the Issuer Framework and Green Issuances, in respect of both required and recommended specifications² of the GBP (June 2021) Core Components³; being as set out in GBP (June 2021). Detailed findings can be found in Appendix 1.

Table 1 Summary of External Review key findings on the alignment of the Issuer Framework with ICMA GBP (June 2021)

Key ■ Meets and goes beyond requirements ■ Meets requirements ■ Does not meet requirements
 ■ Not relevant / applicable to the Issuer and/or External Review ■ Opportunity for enhancement

 <p>Core component Use of Proceeds</p>		<ul style="list-style-type: none"> ✓ The Use of Proceeds is broad, and covers 8 categories of the ICMA GBP which align to 3 ICMA GBP environmental objectives: climate change mitigation, natural resource conservation, and pollution prevention and control. ✓ The Issuer Framework commits to review its alignment with developments in the EU Taxonomy for Sustainable Activities⁴ and any future UK taxonomy⁵, as well as seek certification of issuances where possible to the Climate Bonds Standard⁶ or EU Green Bond Standard⁷, which goes beyond requirements. ■ Two areas for improvement have been identified relating to further exploring and quantifying the impact of the Use of Proceeds categories and publicly disclosing in line with the ICMA Climate Transition Handbook
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¹ An External Review being as contemplated by the ICMA ‘Guidelines for Green, Social, Sustainability and Sustainability-Linked Bonds External Reviews’ (February 2021)

² The External Review differentiates between specifications identified in the GBP as “recommend” and “encourage”, as compared to “should”. The latter is identified as required specifications, and the former as recommended specifications. The External Review approach identifies recommended aspects that are met, as ‘going beyond requirements’ and recommended aspects that are not met, as meeting requirements but with opportunity for enhancement. Additional opportunities for enhancement may also be identified.

³The four Core components of the GBP are: Use of Proceeds; Process for Project Evaluation and Selection; Management of Proceeds; Reporting. The Key recommendations – Green Bond Frameworks and Key Recommendations – External Reviews included in GBP (June 2021) are outside of the four Core components.

⁴ A voluntary financing classification system established by the European Commission.

⁵ In the context of the UK Government proposal to create a UK specific ‘green taxonomy’.

⁶ A labelling and certification scheme for climate bonds and loans operated by the Climate Bond Initiative

⁷ The EUGBS is a voluntary green bond standard established by the European Commission.

		<p>In the External Reviewer’s opinion, Barclays’ process concerning Use of Proceeds meets the requirements of the GBP Principle One – Use of Proceeds.</p>
 <p>Core component Process for Project Evaluation and Selection</p>		<ul style="list-style-type: none"> ✓ The process and governance structure around the selection of assets is outlined and evidenced. It brings together the screening conducted at loan issuance, as well as the additional asset appraisal conducted against the criteria of the Climate Bond Standard and/or EU Green Bond Standard where certification is available. ✓ This is encouraged by the verifier to ensure that the assets meet peer reviewed detailed sector criteria, given that the current Framework is broad in its approach. The process is conducted through both internal and external review and assets are signed off by the relevant green bond committee of senior stakeholders within Barclays. ✓ Barclays frames the objectives of the issuance activity within the context of its net zero strategy and intention to facilitate £100bn of green financing by 2030. ✓ The Issuer Framework outlines its approach to identifying and managing environmental and social risk, and communicates these in their Sustainable Finance Framework. <p>In the External Reviewer’s opinion, Barclays’ process for project evaluation and selection meets the requirements of the GBP Principle Two – Process for Project Evaluation and Selection.</p>
 <p>Core component Management of Proceeds</p>		<ul style="list-style-type: none"> ✓ Barclays’ approach to Management of Proceeds aligns directly with the requirements of the ICMA GBP, relating to establishing a process for managing net proceeds, tracking and tagging assets, reallocating proceeds on a monthly basis, disclosing temporary instruments and seeking third party verification. <p>In the External Reviewer’s opinion, Barclays’ approach to management of proceeds as set out in its Issuer Framework and Processes, is in accordance with the requirements of the GBP Principle Three – Management of Proceeds.</p>
 <p>Core component Reporting</p>		<ul style="list-style-type: none"> ✓ Barclays commits to annual impact and allocation reporting as required by the GBP.

	<ul style="list-style-type: none"> ✓ Barclays has already committed to reporting on carbon intensity and avoided emissions, which are the most commonly requested metrics by investors. 🚩 We encourage Barclays to explore broadening the impact metrics where issuances finance/re-finance relevant to different sectors, as per the recommendations of the ICMA Harmonised Framework for Impact Reporting. <p>In the External Reviewer’s opinion, Barclays’ approach to reporting as set out in its Issuer Framework and Procedures is in accordance with the requirements of the GBP Principle Four – Reporting.</p>
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Key recommendations

This section summarises the key information of the External Review concerning the Issuer Framework, in respect of recommended specifications of the GBP (June 2021) Key components⁸; being as set out in GBP (June 2021) Appendix II for Financial Instrument Guidance. Barclays’ alignment with the Key recommendations are considered recommended aspects⁹.

Table 2 Summary of External Review key findings on the alignment of the Issuer Framework and Green Issuances with ICMA GBP (June 2021) – Key recommendations

Key ■ Meets and goes beyond requirements ■ Meets requirements ■ Does not meet requirements
 ■ Not relevant / applicable to the Issuer and/or External Review 🚩 Opportunity for enhancement

 Key recommendation Green Bond Frameworks		<ul style="list-style-type: none"> ✓ Barclays has established its Issuer Framework that is publicly available and positioned in the context of their overarching sustainability strategy. Where possible, the relevant Issuer commits to assuring each Green Issuance to the Climate Bonds Standard and/or EU Green Bond Standard. The relevant Issuer also commits to disclosing alignment in investor presentations and documentation. ✓ As the Framework is positioned within the context of Barclays’ net zero strategy, Barclays has disclosed to the External Review how it believes it aligns with the Climate Transition Finance Handbook.
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⁸The Key recommendations pertain to Green Bond Frameworks and External Reviews and are evaluated as recommended aspects of the GBP (June 2021), outside of the four Core components.

⁹ Where Barclays does not undertake the recommended practices, these are not identified as areas of non-alignment, but as meeting requirement but with opportunities for enhancement. Should Barclays undertake these practices, these are identified as going beyond specification – this is consistent with the approach to External Review of the Core components.

		<p>🚩 We recommend that Barclays disclose this as part of their Framework and/or reporting in future iterations.</p> <p>In the External Reviewer’s opinion, the Issuer Framework and Processes meet the recommended requirements of the GBP Principle Four – Reporting.</p>
 <p>Key recommendation External Reviews</p>		<p>✓ Barclays has committed to an external review of the Framework, as well as assurance of Green Issuances from the Framework and a verification of the management of proceeds. These will all be made publicly available on the Barclays website here.</p> <p>In the External Reviewer’s opinion, the Issuer Framework and Process for reporting meets the requirements of the GBP Principle Four – Reporting.</p>

Basis of the Second Party Opinion

Purpose of the External Review and this Report

Context

Barclays is a multinational bank and financial services group headquartered in London, United Kingdom. As part of its sustainability strategy, Barclays wants to ensure that its customers and clients have access to financing that places green principles at its core and are committing to this through the launch of their updated Issuer Framework.

The Barclays Green Issuance Framework, July 2021, provides a forward-looking framework for issuing green finance instruments, including: green bonds, green covered bonds, green commercial paper, green structured notes and green index-linked notes.

Barclays has appointed Carbon Trust Assurance, as a suitably qualified and experienced independent external review service provider, to provide an SPO regarding the issuance of Green Issuances under the Issuer Framework, and the Issuer Framework’s alignment with the ICMA GBP.

The GBP are a set of voluntary process guidelines for issuing Green Bonds that “enable capital-raising and investment for new and existing projects with environmental benefits”. The External Reviewer’s role in reviewing the Issuer Framework was to provide a second party opinion as contemplated by the GBP.

Basic information

Issuer names: Barclays PLC, Barclays Bank PLC, Barclays Bank UK PLC, Barclays Bank Ireland PLC

Issuer Green Bond Framework Name: Barclays Green Issuance Framework, July 2021

Green Issuances ISIN: to be provided upon individual Green Issuances

Sustainability standard applicable: ICMA Green Bond Principles, Voluntary Process Guidelines for Issuing Green Bonds (June 2021)

Role of Independent External Review Provider

<input checked="" type="checkbox"/>	Second Party Opinion	<input checked="" type="checkbox"/>	Certification
<input type="checkbox"/>	Verification	<input type="checkbox"/>	Scoring/Rating
<input type="checkbox"/>	Other (<i>please specify</i>):		

Scope of 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

Publication of the External Review

The full version of the Second Party Opinion and associated documents will be available on Barclays' webpage relating to Barclays' Green Issuances.

Applicable standards concerning the External Review

ICMA Green Bond Principles, GBP (June 2021)

Barclays has established the Issuer Framework to underpin the Green Issuances and provide evidence that they are structured to meet the principles and criteria laid out in the GBP.

The GBP are a set of voluntary process guidelines for issuing green bonds; a green bond being a type of bond instrument "exclusively applied to finance or re-finance, in part or in full, new and/or existing eligible Green Projects", the latter being "projects that contribute to environmental sustainability". The GBP are comprised of four core components and two recommendations. It is against these guidelines that the Carbon Trust has reviewed the alignment of the Issuer Framework (July 2021) and the related supporting documentation.

The GBP is comprised of four core components and two recommendations, and the External Reviewer reviewed the alignment of the Issuer Framework with each.

ICMA Climate Transition Finance Handbook (December 2020)

The concept of climate transition focuses principally on the credibility of an issuer's climate change-related commitments and practices. The updated ICMA GBP (June 2021) recommended that the issuers disclose in line with the ICMA Climate Transition Finance Handbook, where the issuances are aligned to an issuer's net zero transition.

There are four key elements to these recommendations:

1. Issuer's climate transition strategy and governance;
2. Business model environmental materiality;
3. Climate transition strategy to be 'science-based' including targets and pathways; and,
4. Implementation transparency.

Although we have encouraged Barclays to disclose in-line with this to the External Reviewer, we do not provide an opinion concerning the sufficiency of this disclosure.

Management Responsibility

The management of Barclays are responsible for the following (the "Procedures"):

1. Designing, implementing and maintaining internal controls relevant to the preparation and issuance of the Green Issuances that are free from material misstatement, whether due to fraud or error;
2. Selecting and/or developing a suitable green framework to underpin the issuance and management of the Green Issuances;
3. Developing a suitable eligibility criteria and process for selecting investments;
4. Reporting relevant information on the use of proceeds; and
5. Maintaining alignment with the GBP criteria.

External Reviewer Responsibility

The External Reviewer's responsibility is to plan and perform work to form an opinion on whether the Issuer Framework for the Green Issuances has been prepared in accordance with the principles of the GBP, as described in the 'Basis of Opinion', and to report to Barclays in the form of a 'Second Party Opinion' based on the work undertaken and the evidence obtained. The External Reviewer has not performed any work, and does not express any conclusion regarding the ongoing effectiveness of the application of the Procedures.

Assurance Standards

The type of External Review undertaken is a Second Party Opinion as identified in the GBP. The Carbon Trust's services are aligned to the ICMA '*Guidelines for Green, Social, Sustainability and Sustainability-Linked Bonds External Reviews*' (February 2021). The Second Party Opinion concerns the Issuer Framework and the Green Issuances. The External Reviewer has reviewed these to confirm alignment with the four components of the GBP, as set out in the Basis of Opinion.

The External Reviewer has worked in accordance with its assurance methodology which is based on the International Standard on Assurance Engagements 3000 ("ISAE 3000") (Revised), **noting that this Second Party Opinion is not an assurance opinion in accordance with ISAE 3000 (Revised).**

The External Reviewer's Competence and Independence

Who we are

Established in 2001, the Carbon Trust works with businesses, governments and institutions around the world, helping them contribute to, and benefit from, a more sustainable future through carbon reduction, resource efficiency strategies, and commercialising low carbon businesses, systems and technologies.

The Carbon Trust:

- works with corporates and governments, helping them to align their strategies with climate science and meet the goals of the Paris Agreement;

- provides expert advice and assurance, giving investors and financial institutions the confidence that green finance will have genuinely green outcomes; and
- supports the development of low carbon technologies and solutions, building the foundations for the energy system of the future.

Headquartered in London, the Carbon Trust has a global team of over 200 staff, representing over 30 nationalities, based across five continents.

Competence and credentials

The Carbon Trust is a leader in the evaluation and certification of sustainability and environmental frameworks, practices and projects, providing an independent point of view to help on the decision-making in connection with Green Bonds and Sustainability Bonds.

The Carbon Trust is an Observer to the ICMA Principles approved by the Secretariat as contemplated in the Governing framework Section 4.2 (<https://www.icmagroup.org/green-social-and-sustainability-bonds/governance-framework/>) and provides regular inputs to updates and other matters put to public comment by ICMA with regards the Principles. Since October 2020, the Carbon Trust has been nominated to sit on the ICMA GBP and Social Bond Principles (SBP) Advisory Council.

With regards Green Bonds for which the primary objectives for underlying projects is climate change mitigation and/or climate change adaptation, the Carbon Trust is an approved *Climate Bonds Initiative* verifier for carrying out Green Bond assessments and verifications under the *Climate Bonds Standard* methodology, which has incorporated the *Green Bond Principles*. Consult: <https://www.climatebonds.net/standards/assurance/approved-verifiers>.

The Carbon Trust evaluates our competency and suitability to perform the External Review given the objective, scope of the work and the particulars of the Green Bond and eligible projects. The Carbon Trust ensures the selection of appropriate professionals to carry out the work in order to give this Second Party Opinion Statement, based on their qualifications, training and experience. This includes the combination of multidisciplinary teams as appropriate, including team members with suitable financial expertise and environmental and sustainability expertise as required.

Independence and conflict of interest policy

The Carbon Trust's commitment to impartiality and quality assurance is established in policies, procedures and management structure. We, the Carbon Trust, maintain our independence from our clients and objectivity with regards to engagements, by maintaining, and adhering to appropriate governance processes that reflect industry best practice for assurance and independent review services. We evaluate potential conflicts and threats to our independence and objectivity, introduce suitable mitigants where these are relevant, and represent to the Bond Issuer concerning these issues.

The outcome of all verification and certification assessments is internally reviewed by senior management to ensure that the approach is rigorous and transparent. We have undertaken this Independent External Review guided by the fundamental ethical and professional principles of integrity,

objectivity, professional competence, due care, appropriate confidentiality and professional behaviour throughout.

External Review procedures

The Carbon Trust planned and performed the work to obtain all the information and explanations considered necessary to provide a basis for its opinion. The Carbon Trust's work included, but was not restricted to, the following activities:

- Reviewing Barclays' positioning of the related documents and related information in context of overarching objectives, strategy, policy and other processes relating to environmental, social and sustainability matters as relevant;
- Evaluating the Issuer Framework and eligibility criteria for these Green Issuances against the four components of the GBP (June 2021), including the analysis of the use and management of the proceeds, the eligibility criteria and the process for project selection, as well as the reporting aspects of the Green Issuances;
- Reviewing Barclays' processes to identify and manage environmental and social risks and impacts, and manage risk mitigants effectively;
- Evaluating the environmental benefits and impact targeted by the eligible green projects, and the potentially material environmental and social risks associated with the eligible green projects, to be financed by the Green Issuances;
- Reviewing the relevance and materiality of selected key performance measures identified by Barclays, including against the guidance provided by the ICMA Handbook for Harmonised Framework for Impact Reporting (June 2021), as well as the anticipated reliability of impact monitoring methodologies reported by Barclays;
- Reviewing the Issuer Documentation implemented by Barclays in relation to the Green Issuances and assessing the suitability of the Procedures;
- Interviewing relevant personnel of Barclays to understand the key related processes, systems, controls, both current and committed, and related documentation;
- Interviewing relevant personnel of Barclays to assess compliance with the Issuer Framework and the implementation of associated policies and procedures;
- Preparation and revision of the SPO, incorporating the findings, conclusions and relevant information gathered during the evaluation process.

Relevant documentation

Issuer documentation

The following information and documents, provided by the Issuer, have been reviewed in order to form the basis of the SPO (the "Issuer Documentation"):

- > Barclays Issuer Framework (2021)
- > Barclays Green Bond Asset Selection Committee Minutes (March 2021)
- > Barclays Green Finance Framework (2021)

Other documentation

- > ICMA Green Project Mapping (June 2021)
- > ICMA Handbook for Harmonised Framework for Impact Reporting (June 2021)
- > ICMA Green Bond Principles (June 2021)
- > ICMA Climate Transition Finance Handbook (December 2020)

Limitations of the External Review

Given that our External Review work (in relation to the Scope) was undertaken at pre-issuance stage, our procedures have been confined to the reviewer activities set out in this document, and did not evaluate individual eligible projects to be financed. We did not perform assessments on data and information beyond the defined scope and reviewer activities as defined in this Report.

The Second Party Opinion Statement is based on information and data available, and the results of our assessment carried out, on or before the 23rd July 2021 and no further information and data subsequent to that date was considered or further assessment carried out.

Appendix 1: Detailed External Reviewer Opinion in line with the ICMA Green Bond Principles (June 2021)

Set out below are our component specific findings and statements in relation to each of the four ICMA GBP core components and two recommendations, as they relate to the Issuer Framework. These are integrated with the suggested ICMA template.

Principle One – Use of Proceeds

Overview

Use of proceeds categories as per GBP:

<input checked="" type="checkbox"/>	Renewable energy	<input checked="" type="checkbox"/>	Energy efficiency
<input checked="" type="checkbox"/>	Pollution prevention and control	<input checked="" type="checkbox"/>	Environmentally sustainable management of living natural resources and land use
<input type="checkbox"/>	Terrestrial and aquatic biodiversity conservation	<input checked="" type="checkbox"/>	Clean transportation
<input checked="" type="checkbox"/>	Sustainable water and wastewater management	<input type="checkbox"/>	Climate change adaptation
<input checked="" 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 GBPs	<input type="checkbox"/>	Other (please specify):

If applicable please specify the environmental taxonomy, if other than GBPs: Barclays has acknowledged that over time the Framework will be evolved to suit the evolving requirements of the EU taxonomy and green bond standard, as well as the UK taxonomy as it is developed. Any issuance that seeks external certification will meet the additional criteria where these differ from the current Issuer Framework.

Review

The proceeds of the bond should be used to finance or refinance Green Projects which should be appropriately described in the legal documentation of the financial security. All designated Green Project categories should provide clear environmental benefits, which will be assessed and, where feasible, quantified by the issuer. Eligible project categories and Green Projects are indicatively described in the GBP.

Further recommendations pertain to the Bond Issuer providing information regarding re-financing where all or a portion of proceeds may be used for re-financing and further guidance that may be sought by Bond Issuers with regards to categories and criteria for Green Projects.

Key ■ Meets and goes beyond requirements ■ Meets requirements ■ Does not meet requirements
■ Not relevant / applicable to the Issuer and/or External Review ■ Opportunity for enhancement

GBP 2021 specification	Issuer practice	Assessment result
<p>Designated eligible Green Projects should provide clear environmental benefits which will be assessed and, where feasible, quantified by the issuer</p>	<p>The Issuer Framework has a very broad set of use of proceeds “themes and sub-themes”. The high-level themes cover: energy efficiency; renewable energy; sustainable transport; sustainable food, agriculture, forestry, aquaculture and fisheries; and resource efficiency and pollution control. This intentionally mimics Barclays Sustainable Financing Framework 2021, in an effort to align Barclays’ sustainably labelled assets and liabilities.</p> <p>The use of proceeds themes and sub-themes in the Issuer Framework outline and define eligible projects and activities. Impact isn’t quantified but is explained in most themes, however, in the Carbon Trust’s opinion the eligible themes are likely to have a positive</p>	<p style="text-align: center;"> ■ ■ </p>

	<p>impact on climate mitigation, natural resource conservation, and pollution prevention and control.</p> <p>It is recommended to Barclays that in further iterations of the Issuer Framework, the likely impact of the use of proceeds categories is further discussed and quantified, as well as a likely proportion of financing in each category – given the breadth of the Issuer Framework.</p>	
<p>The use of proceeds may align with the non-exhaustive GBP explicitly-recognised project categories advancing environmental objectives such as such as: climate change mitigation, climate change adaptation, natural resource conservation, biodiversity conservation, and pollution prevention and control</p>	<p>The Issuer Framework themes align with 8 of the of the ICMA GBP categories:</p> <ul style="list-style-type: none"> • Renewable energy • Energy efficiency • Pollution prevention and control • Environmentally sustainable management of living natural resources and land use • Clean transportation • Sustainable water and wastewater management • Circular economy adapted products, production technologies and processes • Green buildings <p>The activities outlined should lead to advancing 3 of the ICMA GBP environmental objectives of:</p> <ul style="list-style-type: none"> • Climate change mitigation • natural resource conservation • pollution prevention and control 	
<p>The use of proceeds may refer to other taxonomies and nomenclatures as guidance as to what is considered green and eligible, and draw upon (appropriate) independent definitions, analysis, advice and guidance on the quality of different green solutions and environmental practices</p>	<p>Barclays has committed to review the Framework in line with developments with the EU green bond standard and taxonomy, and the UK taxonomy. They will also screen use of proceeds against the Climate Bonds Standard/EU taxonomy criteria, where certification is sought for issuances against these standards, using internal and external review.</p> <p>The Carbon Trust has seen evidence of this being applied in practice. This is a rigorous approach to ensuring the eligibility of assets against their own Issuer Framework as well as others.</p>	

<p>The Use of Proceeds should be appropriately described in the legal documentation of the security</p>	<p>Barclays commits to outlining the use of proceeds in legal documentation for securities issued against the Issuer Framework and in Green Issuance offering materials.</p>	
<p>If refinancing, the issuer should provide an estimate of the share of financing vs. re-financing, and where appropriate, also clarify which investments or project portfolios may be refinanced</p>	<p>As a financial intermediary, at least initially, the Green Issuances issued will be refinancing the portfolio of existing eligible assets. It is recommended that the relevant Issuer ensure that this is clearly outlined in the Green Issuance offering materials.</p>	
<p>If refinancing and to the extent relevant, the issuer should define the expected look-back period for refinanced eligible Green Projects</p>	<p>The lookback period in the Issuer Framework is a maximum of 36 months. This is consistent with market practice and a relatively narrow time frame. Lookback period and refinancing activity in combination, are means to encourage new pipeline development. Barclays is encouraged to ensure both are clearly communicated in the bond prospectus, with a recommended focus toward new financing and narrowing lookback period.</p>	
<p>Where issuers wish to finance projects towards implementing a net zero emissions strategy aligned with the goals of the Paris Agreement, guidance from the ICMA 'Climate Transition Finance Handbook' may be sought</p>	<p>Barclays has set a net zero target for 2050 and communicates that this Issuer Framework and subsequent issuances reflects Barclays' ambition of aligning their financing with the goals of the Paris Climate Agreement. Barclays has been able to present to us how they believe their activities align with the climate transition finance framework. We recommend that Barclays consider disclosing this in future Issuer Framework revisions and/or reporting.</p>	

Core component opinion

<p>Aligns with ICMA GBP (June 2021)</p>	<p>The Use of Proceeds is broad, and covers 8 categories of the ICMA GBP which align to 3 ICMA GBP environmental objectives: climate change mitigation, natural resource conservation, and pollution prevention and control. The Issuer Framework commits to review its alignment with developments in the EU and UK Taxonomy, as well as seek certification of issuances where possible to the Climate Bonds Standard or EU Green Bond Standard.</p>
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**Principle One
– Use of
Proceeds**

Three areas for improvement have been identified relating to shortening the look back period over time (currently a maximum of 36 months), further exploring and quantifying the impact of the use of proceeds categories, and disclosing publicly in line with the ICMA Climate Transition Finance Handbook.

In the External Reviewer’s opinion, Barclays’ process for use of proceeds meets the requirements of the GBP Principle One – Use of Proceeds.

Principle Two – Process for Project Evaluation and Selection

Overview

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 checked="" type="checkbox"/>	Summary criteria for project evaluation and selection publicly available	<input type="checkbox"/>	Other (please specify):

Information on Responsibilities and Accountability

<input checked="" type="checkbox"/>	Evaluation / Selection criteria subject to external advice or verification	<input checked="" type="checkbox"/>	In-house assessment
<input type="checkbox"/>	Other (please specify):		

Review

The issuer of a Green Bond should outline a process to determine how the projects fit within the eligible Green Projects categories identified in the GBP, including a process for determining eligibility and the criteria used. The process should consider the environmental objectives of the proposed bond.

The Bond Issuer is encouraged to position this information in context of overarching governance and/or other processes relating to environmental sustainability, and to disclose pertinent standards or certifications. The Bond Issuer is recommended to supplement its process with an external review.

Table 3 Detailed review of Issuer alignment to GBP (June 2021) Principles Two – Process for Project Evaluation and Selection

Table 4 Detailed review of Issuer alignment to GBP (June 2021) Principles Two – Process for Project Evaluation and Selection

Key ■ Meets and goes beyond requirements ■ Meets requirements ■ Does not meet requirements
■ Not relevant/applicable to the Issuer and/or External Review ■ Opportunity for enhancement

GBP 2021 specification	Issuer practice	Assessment result
The issuer should clearly communicate to investors the environmental sustainability objectives of the eligible Green Projects	All issuances against the Issuer Framework reflect Barclays’ ambition of aligning all financing with the goals of the Paris Climate Agreement. As already introduced, the Issuer Framework is very broad, however each theme and sub-theme does describe the types of activities and sustainability objectives of these that fall within respective environmental objectives of climate change mitigation, natural resource conservation and pollution prevention and control.	■
The issuer should clearly communicate to investors the process by which it determines how projects fit within the eligible Green Project categories	<p>All assets within the universe which the relevant Issuer selects Eligible Assets from, follow the origination process highlighted by their Sustainable Finance Framework, for example going through the relevant decision tree to qualify as green and where assets in Sensitive Energy Sectors are screened by the climate risk team.</p> <p>Eligible assets are then further screened against additional criteria required for certified issuances (where this is possible) for example against the Climate Bonds Standard criteria and/or EU taxonomy. This is conducted through both internal and external review, before being presented and signed off by the Green Bond Committee of the relevant Issuer. The relevant committee brings together senior stakeholders who both understand Green Projects and the associated environmental benefits and risks.</p>	■

<p>The issuer should clearly communicate to investors complementary information on processes by which it identifies and manages associated social and environmental risks</p>	<p>The loan origination process highlighted by Barclays' Sustainable Finance Framework addresses the management of social and environmental risks and the Issuer Framework flags exclusions which focus on environmental criteria.</p>	
<p>The issuer is encouraged to position the information regarding the Green Bond in the context of its overarching objectives, strategy, policy and/or processes relating to environmental sustainability</p>	<p>Barclays has set a net zero target for 2050 and communicates that this Issuer Framework and issuance reflects Barclays' ambition of aligning their financing with the goals of the Paris Climate Agreement. It has linked its Green Finance Framework to its Issuer Framework, to demonstrate that Barclays is considering the lifecycle of the loans for the purpose of issuing green financing instruments, and has a commitment to facilitate £100bn of green financing by 2030.</p>	
<p>The issuer is encouraged to provide information on the alignment with official or market-based taxonomies, related eligibility criteria, and exclusion criteria (if relevant)</p>	<p>Barclays has committed to continually update the Issuer Framework in line with developments with the EU Green Bond Standard, EU Taxonomy, and UK taxonomy. They will also screen use of proceeds (through internal and external review) against the Climate Bonds Standard or EU Green Bond Standard criteria, or others, where certification is sought for issuances against the standard.</p> <p>The Carbon Trust has seen evidence of this being applied in practice and considers this a rigorous approach to ensuring the eligibility of assets against their own Issuer Framework as well as others. We encourage the relevant Issuer to pursue certification of each issuance (where possible) given the breadth of their current Issuer Framework. In ensures that assets are adhering to strict peer reviewed climate aligned criteria which is more detailed than their current Issuer Framework.</p>	

<p>The issuer is encouraged to disclose any green standards or certifications referenced in project selection</p>	<p>Within the Issuer Framework, Barclays discloses green standards and certifications for buildings and sustainable food, agriculture, forestry, aquaculture and fisheries categories. These are recognised global standards. Where certification is sought, the projects will also be screened against the EU Taxonomy and/or Climate Bonds Standard Criteria.</p>	
<p>The issuer is encouraged to have a process in place to identify mitigants to known material risks of negative social and/or environmental impacts from the relevant projects</p>	<p>The origination process highlighted by their Sustainable Finance Framework addresses the management of social and environmental risks. The Issuer Framework clearly flags exclusions which focus on environmental criteria.</p>	

Core component opinion

<p>Aligns with ICMA GBP (June 2021)</p> <p>Principle Two – Process for Project Evaluation and Selection</p>	<p>The process and governance structure around the selection of assets is outlined and evidenced. It brings together the screening conducted at loan issuance, as well as the additional asset appraisal conducted against the criteria of the Climate Bond Standard and/or EU Green Bond Standard where certification is available. This is encouraged by the verifier to ensure that the assets meet peer reviewed detailed sector criteria, given that the current Framework is broad in its approach. The process is conducted through both internal and external review and assets are signed off by the relevant green bond committee of senior stakeholders within the relevant Issuer.</p> <p>Barclays frames the objectives of the issuance activity within the context of its net zero strategy and intention to facilitate £100bn of green financing by 2030. It also outlines its approach to environmental and social risk, however social risk is not explicitly discussed in the Issuer Framework, but it is in other documentation including the Green Financing Framework, so there is a recommendation for this to be considered.</p> <p>In the External Reviewer’s opinion, Barclays’ process for project evaluation and selection meets the requirements of the GBP Principle Two – Process for Project Evaluation and Selection.</p>
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Principle Three – Management of Proceeds

Overview

Tracking of proceeds:

<input checked="" type="checkbox"/>	Green Bond proceeds segregated or tracked by the issuer in an appropriate manner
<input checked="" type="checkbox"/>	Disclosure of intended types of temporary investment instruments for unallocated proceeds
<input type="checkbox"/>	Other (please specify):

Additional disclosure:

<input type="checkbox"/>	Allocations to future investments only	<input type="checkbox"/>	Allocations to both existing and future investments
<input type="checkbox"/>	Allocation to individual disbursements	<input checked="" type="checkbox"/>	Allocation to a portfolio of disbursements
<input checked="" type="checkbox"/>	Disclosure of portfolio balance of unallocated proceeds	<input type="checkbox"/>	Other (please specify)

Review

The net proceeds of Green Bonds should be credited to a sub-account, moved to a sub-portfolio or otherwise tracked by the issuer in an appropriate manner and attested to by a formal internal process linked to the issuer's lending and investment operations for Green Projects. So long as the Green Bond is outstanding, the balance of the tracked net proceeds should be periodically adjusted to match allocations to eligible Green Projects made during that period. A declaration should be made as to how any unallocated funds are managed.

The Bond Issuer is recommended to supplement its processes with an external review by an auditor, or other third party, to verify the internal tracking method and the allocation of funds from the Green Bond proceeds.

Table 5 Detailed review of Issuer alignment to GBP (June 2021) Principles Three – Management of Proceeds

Key ■ Meets and goes beyond requirements ■ Meets requirements ■ Does not meet requirements
 ■ Not relevant / applicable to the Issuer and/or External Review ■ Opportunity for enhancement

GBP 2021 specification	Issuer practice	Assessment result
<p>The net proceeds of the Green Bond, or an amount equal to these net proceeds, should be credited to a sub-account, moved to a sub-portfolio or otherwise tracked by the issuer in an appropriate manner</p>	<p>Barclays has demonstrated that adequate processes are in place to track net proceeds of the bonds at issuance and throughout the life of the issuance through the appropriate tagging of loan assets in their systems.</p>	<p>■</p>
<p>The aforementioned process should be attested to by the issuer in a formal internal process linked to the issuer’s lending and investment operations for eligible Green Projects</p>	<p>Barclays has demonstrated the above process, exemplified with an upcoming issuance, and previous issuances, which satisfies the criteria.</p>	<p>■</p>
<p>Whilst the Green Bond is outstanding, the balance of the tracked net proceeds should be periodically adjusted to match allocations to eligible Green Projects made during that period</p>	<p>Barclays, through the treasury and/or portfolio management desks, has committed to monitor the allocation of proceeds following a Green Issuance on a monthly basis to ensure Eligible Asset balances are updated, and facilities which mature, are repaid or are no longer eligible will be removed from the portfolio.</p>	<p>■</p>

<p>The issuer should make known to investors the intended types of temporary placement for the balance of unallocated net proceeds</p>	<p>Barclays has outlined their intention to invest all of the net proceeds from a Green Issuance in the financing and/or refinancing of Eligible Assets as soon as reasonably practicable. However, if it is unable to, the Framework outlines that any shortfall will be invested (at the relevant Issuer’s own discretion) in cash and short-term and liquid investments in accordance with its liquidity policy until additional Eligible Assets are available.</p>	
<p>The proceeds of Green Bonds can be managed per bond (bond-by-bond approach) or on an aggregated basis for multiple green bonds (portfolio approach)</p>	<p>Each Issuer is likely to manage green issuance proceeds in accordance with each issuance however there may be programmatic issuance opportunities against the Climate Bonds Standard which might lead to proceeds being managed on a portfolio approach.</p>	
<p>A high level of transparency is encouraged; it is recommended that an issuer’s management of proceeds be supplemented by the use of an external auditor, or other third party, to verify the internal tracking method and the allocation of funds from the Green Bond proceeds</p>	<p>Barclays commits to verifying their internal process and approach by a suitably qualified independent assurance provider as part of the reporting associated with the corresponding Green Issuance.</p>	

<p align="center">Aligns with ICMA GBP (June 2021)</p> <p align="center">Principle Three – Management of Proceeds</p>	<p>Barclays’ approach to Management of Proceeds aligns with the requirements of the ICMA GBP, relating to establishing a process for managing net proceeds, tracking and tagging assets, reallocating proceeds on a monthly basis, disclosing temporary instruments and seeking third party verification.</p> <p>In the External Reviewer’s opinion, Barclays’ approach to management of proceeds as set out in its Issuer Framework and Processes, is in accordance</p>
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with the requirements of the GBP Principle Three – Management of Proceeds.

Principle Four – Reporting

Overview

Use of proceeds reporting:

<input type="checkbox"/>	Project-by-project	<input checked="" type="checkbox"/>	On a project portfolio basis
<input checked="" type="checkbox"/>	Linkage to individual bond(s)	<input type="checkbox"/>	Other (please specify):

Information reported:

<input checked="" type="checkbox"/>	Allocated amounts	<input type="checkbox"/>	Green Bond financed share of total investment
<input type="checkbox"/>	Other (please specify):		

Frequency:

<input checked="" type="checkbox"/>	Annual	<input type="checkbox"/>	Semi-annual
<input type="checkbox"/>	Other (please specify):		

Impact reporting:

<input type="checkbox"/>	Project-by-project	<input checked="" type="checkbox"/>	On a project portfolio basis
<input checked="" type="checkbox"/>	Linkage to individual bond(s)	<input type="checkbox"/>	Other (please specify):

Frequency:

<input checked="" type="checkbox"/>	Annual	<input type="checkbox"/>	Semi-annual
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<input type="checkbox"/>	Other (please specify):		
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Information reported (expected or ex-post):

<input checked="" type="checkbox"/>	GHG Emissions / Savings	<input checked="" type="checkbox"/>	Energy Savings
<input type="checkbox"/>	Decrease in water use	<input type="checkbox"/>	Other ESG indicators (please specify):

Means of Disclosure

<input checked="" type="checkbox"/>	Information published in financial report	<input checked="" type="checkbox"/>	Information published in sustainability report
<input type="checkbox"/>	Information published in ad hoc documents	<input type="checkbox"/>	Other (please specify):
<input type="checkbox"/>	Reporting reviewed (if yes, please specify which parts of the reporting are subject to external review):		

Useful Links

The full version of the Second Party Opinion will be available on Barclays' webpage relating to Barclays' Green Issuances. The Issuer Framework is available at the same website.

Specify other external reviews available, if appropriate:

Type(s) of Review provided

<input checked="" type="checkbox"/>	Second Party Opinion	<input type="checkbox"/>	Certification
<input type="checkbox"/>	Verification	<input type="checkbox"/>	Scoring/Rating
<input type="checkbox"/>	Other (please specify):		

Review provider(s): Carbon Trust Assurance Ltd

Date of publication: 23.07.2021

Review

Issuers should make, and keep, readily available, up-to-date information on the use of proceeds to be renewed annually until full allocation, and on a timely basis in case of material developments. 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 and the amounts allocated, and their expected impact. Where confidentiality agreements, competitive considerations, or a large number of underlying projects limit the amount of detail that can be made available, the GBP recommend that information is presented in generic terms or on an aggregated portfolio basis. The GBP recommend the use of qualitative performance indicators and, where feasible, quantitative performance measures, and the disclosure of the key underlying methodology and/or assumptions used in the quantitative determination. Bond Issuers with the ability to monitor achieved impacts are encouraged to include those in their regular reporting.

Table 6 Detailed review of Issuer alignment to GBP (June 2021) Principles Four – Reporting

Key ■ Meets and goes beyond requirements ■ Meets requirements ■ Does not meet requirements
 ■ Not relevant / applicable to the Issuer and/or External Review ■ Opportunity for enhancement

GBP 2021 specification	Issuer practice	Assessment result
The issuer should make, and keep, readily available up to date information on the use of proceeds to be renewed annually until full allocation, and on a timely basis in case of material developments	Barclays has committed to annual reporting of the use of net proceeds at least annually as part of its allocation reporting. This will be available on Barclays' webpage relating to Barclays' Green Issuances.	■
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. Where additional considerations limit the amount of detail that	Barclays has committed to conduct both impact and allocation reporting at least annually on assets at the project level. Given the relevant Issuer's intermediary status, the data is likely to be aggregated to some degree as project specifics may not be able to be disclosed. Allocation reporting will focus on: <ul style="list-style-type: none"> Alignment of use of process to the framework 	■

<p>can be made available, information should be presented in generic terms or on an aggregated portfolio basis</p>	<ul style="list-style-type: none"> • Size of the outstanding green issuance and allocation portfolio of eligible assets • Stratification tables of the assets • Balance of the equivalent net proceeds <p>Impact reporting will focus on carbon intensity and carbon avoided metrics.</p>	
<p>Recommended: Transparency is of particular value in communicating the expected and/or achieved impact of projects; the use of qualitative performance indicators and, where feasible, quantitative performance measures and disclosure of the key underlying methodology and/or assumptions used in the quantitative determination is recommended</p>	<p>Barclays has committed to providing post-issuance impact reporting of carbon intensity and avoided emissions. Previous issuances against earlier versions of Barclays’ Green Issuance (formerly Bond) Framework, have documented the approach to measuring avoided emissions and carbon intensity.</p> <p>Given the breadth of sectors now included in the Issuer Framework, we recommend that a broader set of impact indicators are explored and reported against where possible.</p> <p>We also encourage pre-issuance impact reporting where possible and available, especially for assets that are already financed.</p>	
<p>Recommended: The issuer should refer to and adopt, where possible, the guidance and impact reporting templates provided in the ICMA Harmonised Framework for Impact Reporting</p>	<p>Barclays is already committed to reporting on carbon intensity and avoided emissions, which are the commonly requested impact reporting indicators by investors, but we do advise Barclays to report on sector specific metrics as advised in the ICMA Harmonised Framework for Impact Reporting.</p>	

Core component opinion

Aligns with
ICMA GBP
(June 2021)

Principle
Four –
Reporting

Barclays commits to annual impact and allocation reporting as required by the GBP. Barclays has already committed to reporting on carbon intensity and avoided emissions and we encourage Barclays to explore broadening impact metrics relevant to different sectors, as per the ICMA Harmonised Framework for Impact Reporting.

In the External Reviewer's opinion, Barclays' approach to reporting as set out in its Issuer Framework and Procedures is in accordance with the requirements of the GBP Principle Four – Reporting.

Key Recommendations – Green Bond Frameworks

Overview

The GBP (June 2021) includes ‘Key Recommendations’ concerning Green Bond. This section reviews these key recommendations as specifications made by the GBP (June 2021) in addition to the four Core Components.

Table 7 Detailed review of Issuer alignment to GBP (June 2021) Key Recommendations – Green Bond Frameworks

Key  Meets and goes beyond requirements  Meets requirements  Does not meet requirements
 Not relevant / applicable to the Issuer and/or External Review  Opportunity for enhancement

GBP 2021 specification	Issuer practice	Assessment result
<p>The issuer should explain the alignment of their Green Bond or Green Bond programme with the four core components of the GBP or in a Green Bond Framework or in their legal documentation, which should be in a readily accessible format to investors</p>	<p>For each issuance, the relevant Issuer has committed to disclose in investor presentations and documentation the alignment of the issuance with the Issuer Framework. The relevant Issuer will also seek assurance of each issuance (where possible) against the Climate Bonds Standard and/or EU Green Bonds Standard which therefore provides an additional level of assurance on the issuances’ alignment to the criteria of the GBP.</p>	
<p>It is recommended that issuers summarise in their Green Bond Framework relevant information within the context of the issuer’s overarching sustainability strategy. This may include reference to the five high level environmental objectives of the GBP</p>	<p>The Issuer Framework is positioned within the context of their overarching sustainability strategy – mainly focused on climate mitigation activities. Barclays has committed to a net zero target by 2050, with a target of increasing green financing flows to £100bn by 2030. The Issuer Framework also aligns with the Issuer’s Green Finance (lending) Framework in a bid to link the sustainability narrative of its assets and liabilities.</p>	

<p>Issuers are also encouraged to disclose any taxonomies, green standards or certifications referenced in project selection</p>	<p>Barclays commits to amending and aligning the Framework to the EU Taxonomy and UK taxonomy when required over time. It also commits to seeking CBI Certification and/or EU Green Bond Standard alignment for separate issuances, where possible.</p>	
<p>When communicating Paris-aligned transition strategies in the context of projects targeting climate change mitigation, issuers are encouraged to use guidance from the Climate Transition Finance Handbook</p>	<p>As part of this External Review, Barclays has been able to present to us how they believe their activities align with the ICMA Climate Transition Finance Framework. We recommend that Barclays consider disclosing this in future Issuer Framework revisions and/or reporting.</p>	

Key recommendations opinion

<p>Aligns with ICMA GBP (June 2021) Key recommendation – Green Bond Framework</p>	<p>Barclays has established an Issuer Framework that is publicly available and positioned in the context of their overarching sustainability strategy. Where possible, the relevant Issuer commits to assuring each Green Issuance to the Climate Bonds Standard and/or EU Green Bond Standard. The relevant Issuer also commits to disclosing alignment in investor presentations and documentation.</p> <p>As the Issuer Framework is positioned within the context of Barclays’ net zero strategy, Barclays has been able to disclose how it feels its activities align with the Climate Transition Finance Handbook. We recommend that Barclays disclose this as part of their Issuer Framework and/or reporting in future iterations.</p> <p>In the External Reviewer’s opinion, the Issuer Framework and Processes meet the recommended aspects of the GBP Key recommendations – Green Bond Framework.</p>
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Key Recommendations – External Reviews

Overview

The GBP (June 2021) includes 'Key Recommendations' concerning External Reviews. This section reviews these key recommendations as specifications made by the GBP (June 2021) in addition to the four Core Components.

Table 8 Detailed review of Issuer alignment to GBP (June 2021) Key Recommendations – External Reviews

Key  Meets and goes beyond requirements  Meets requirements  Does not meet requirements
 Not relevant / applicable to the Issuer and/or External Review  Opportunity for enhancement

GBP 2021 specification	Issuer practice	Assessment result
It is recommended that issuers appoint (an) external review provider(s) to assess through a pre-issuance external review the alignment of their Green Bond or Green Bond programme and/or Framework with the four core components of the GBP	Barclays has commissioned an external review of the Framework and will also seek pre-issuance verification of Green Issuances from the Issuer Framework against the CBI and/or EU Green Bond Standard when possible.	
The issuer should make external reviews publicly available and use the template for external reviews made available by ICMA	Barclays makes all documents, including the Issuer Framework, External Reviews and documents relating to the relevant Green Issuance, available on Barclays' webpage relating to Barclays' Green Issuances.	
It is recommended that, post issuance, an issuer's management of proceeds be supplemented by the use of an external auditor, or other third party, to verify the	Barclays has committed to verifying the management of proceeds by a suitably qualified independent assurance provider as part of the reporting associated with the corresponding Green Issuance.	

<p>internal tracking and the allocation of funds from the Green Bond proceeds to eligible Green Projects</p>		
<p>The issuer should consult the ICMA Guidelines for External Reviews (February 2021) concerning recommendations and explanations on the different types of reviews</p>	<p>Barclays sought an external review in the form of a Second Party Opinion.</p>	<p>■</p>
<p>Issuers should make external reviews publicly available on their website and/or through any other accessible communication channel as appropriate and if feasible, as well as use the template for external reviews available in the sustainable finance section of ICMA's website.</p>	<p>Barclays makes the external review available on their website here, and the external review incorporates the template provided by ICMA.</p>	<p>■</p>

Key recommendations opinion

<p>Aligns with ICMA GBP (June 2021) Key recommendation – External Reviews</p>	<p>Barclays has committed to an external review of the Issuer Framework, as well as assurance of Green Issuances from the Issuer Framework and a verification of the management of proceeds. These will all be made publicly available on the Barclays' website here. In the External Reviewer's opinion, the Issuer Framework and Process for reporting meets the recommended aspects of the GBP Key recommendation – External Reviews.</p>
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