

Latvenergo AS

Post-Issuance Review – European Green Bond Assessment

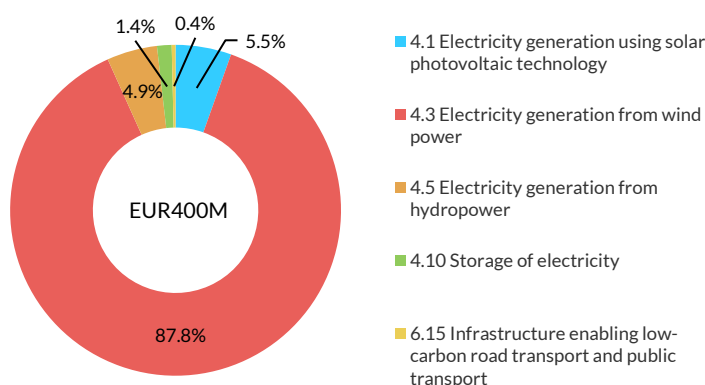
Key Debt Details

Instrument:	Green 3.612% EUR400 million due 13 November 2030 (ISIN: XS3227294132)
Issuer Legal Name:	Latvenergo AS
LEI:	213800DJRB539Q1EMW75
Date of Publication of European Green Bond Factsheet	13 October 2025
Date of Publication of European Green Bond Annual Allocation Report	2 September 2026

Summary Components

Allocations	Disclosure and Assessment
	
Intended allocation approach:	Gradual approach
Use of proceeds (UoP) intended for activities that are environmentally sustainable ^a	100% of the bond proceeds
^a Under Article 3 of Regulation (EU) 2020/852.	

Proceeds Allocation



Source: Latvenergo European Green Bond allocation report (August 2026)

Note: The proceeds allocation is broken down by EU taxonomy economic activity rather than UoP category.

Introductory and Alignment Statements

Sustainable Fitch has assessed the completed European Green Bond (EuGB) allocation report laid down in Annex II to Regulation (EU) 2023/2631 of the European Parliament and of the Council.

This review represents an independent opinion of the external reviewer, and is to be relied upon only to a limited degree.

Sustainable Fitch considers transaction(s) under this sustainable finance instrument to be aligned with Regulation (EU) 2023/2631 and the uses of proceeds are aligned with Regulation (EU) 2020/852.

European Green Bond Assessment



Date assigned	2 September 2026
Framework Type	Green
European Green Bond Assessment	✓ Regulation (EU) 2023/2631 on European Green Bonds and optional disclosures for bonds marketed as environmentally sustainable and for sustainability-linked bonds ✓ Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment

European Green Bond Methodology

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European Green Bond Assessment Summary

Factsheet Sections	Alignment	Key Drivers
General Information		- Latvenergo issued an EuGB on 13 November 2025, in line with Regulation (EU) 2023/2631. It financed fully taxonomy-aligned projects within five categories: - solar PV plants; - wind power plants; - hydropower plants (HPPs); - storage of electricity; and - low-carbon transport infrastructure. - We conducted a post-issuance external review of Latvenergo's EuGB allocation report, with a focus on assessing the alignment of the factsheet with Regulation (EU) 2023/2631 and the included economic activities with Regulation (EU) 2020/852 (the EU taxonomy). - No conflicts of interest related to Sustainable Fitch providing the external review have been identified. No solicited ratings product has been provided by us to Latvenergo.
Introductory Statement		- We have assessed Latvenergo's EuGB allocation report, in line with Annex II to Regulation (EU) 2023/2631 of the European Parliament and of the Council. - This review represents an independent opinion from us as an external reviewer, and is to be relied upon only to a limited degree.
Statement on the Alignment of UoP with Reg. (EU) 2020/852		We consider the use of proceeds (UoP) categories under this transaction to be aligned with Regulation (EU) 2020/852.
Sources, Assessment Methodologies and Key Assumptions		Latvenergo European Green Bond allocation report 2025 Latvenergo European Green Bond factsheet (13 October 2025) EU Taxonomy Compass Sustainable Fitch European Green Bond Assessment and EU Taxonomy – Methodology (13 December 2024)
Assessment and Opinion		- The quality of information provided by Latvenergo is sufficient to perform the post-issuance review. - The issuer demonstrates alignment with Article 4 of Regulation (EU) 2023/2631, as the allocation report confirms that bond proceeds have been fully allocated to the group's taxonomy-aligned capex and opex, falling under categories (b) and (c) of the gradual approach set out in this Article. - The flexibility to allow partial non-alignment with the technical screening criteria, as provided for in Article 5 of Regulation (EU) 2023/2631, has not been exercised, as confirmed by the allocation report. - The provisions of Article 6 of Regulation (EU) 2023/2631 (regarding the allocation of proceeds to financial assets) are not applicable, as bond proceeds were allocated directly to capex and opex. - The requirement to publish a capex plan, as referred to in Article 7 of Regulation (EU) 2023/2631, does not apply as the proceeds were allocated to capex and opex that is already taxonomy aligned. - The issuer demonstrates alignment with Article 8 of Regulation (EU) 2023/2631, as the allocation report confirms that the bond proceeds were allocated to capex and opex aligned with the technical screening criteria applicable at the time of issuance.
Any Other Information		None applicable.



Allocations - Disclosure and Assessment of UoP Allocations

UoP – Disclosure

The following table shows Latvenergo's allocation of the EU400 million of net proceeds across the various UoP categories, based on the capex and opex disbursed in 2023–2025 and as reported in the issuer's EuGB allocation report, and following the issuance of the bond transaction (ISIN XS3227294132). It allocated EUR350 million of the proceeds shortly after the bond issuance in November 2025, with the remaining EUR50 million being allocated in June 2026 to eligible capex incurred in 2024.

Where feasible, we show the amount allocated to the each of the projects financed within each UoP.



UoP category	Environmental objective	EU taxonomy economic activity	Allocation type	Share of allocation in total (aggregated)	Share of project financed by the bond ^a
Renewable energy					
Electricity generation from solar PV technology	EO1	4.1. Electricity generation using solar photovoltaic technology	Capex	5.5%	13%
Electricity generation from wind power	EO1	4.3. Electricity generation from wind power	Capex	87.8%	62%
Electricity generation from hydropower	EO1	4.5. Electricity generation from hydropower	Opex	4.9%	53%
Storage of electricity	EO1	4.10. Storage of electricity	Capex	1.4%	57%
Clean transportation					
Low-carbon transport infrastructure	EO1	6.15. Infrastructure enabling low-carbon road transport and public transport	Opex	0.4%	100%
Unallocated				0%	Not applicable

^a Latvenergo calculated the share as a percentage of the total eligible expenditure incurred during the reporting years. The denominator is the total eligible capex and/or opex, depending on whether the activity is financed through capex, opex or a combination of both.

Source: Latvenergo EuGB allocation report (August 2026)

Latvenergo had fully allocated the net proceeds to eligible projects as of the review date, with all allocations relating to capex and opex disbursed in 2023–2025. It used 82% for new financing and the remaining 18% for refinancing. The allocation was mostly to renewable power, with EUR351.3 million (87.8%) for wind power plants. This supported Latvenergo's existing 145MW wind generation capacity and further wind farms under development in Latvia and Lithuania.

It allocated EUR21.8 million to new financing for solar PV plants, reflecting the group's portfolio of 22 operating solar parks in the Baltic states and three additional solar parks under construction in Latvia and Lithuania. Latvenergo also used EUR19.7 million to refinance opex related to its HPPs, covering its HPP portfolio with a total capacity of 1,560MW.

Smaller allocations included EUR5.7 million of new financing for electricity storage, covering battery energy-storage systems (BESS). They also include EUR1.5 million to low-carbon transport infrastructure, with 28% being financing and 72% refinancing. This supports the Elektrum Drive electric vehicle charging network across the Baltic states.

No proceeds from this bond remained unallocated as of the review date.

UoP	Amount Allocated in the Reporting Period			Amount Allocated in Total (Aggregated)		
	Amount (EURm)	Share	Share of Financing Versus Refinancing	Amount (EURm)	Share	Share of Financing Versus Refinancing
Renewable energy						
Electricity generation from solar PV technology	21.8	5.5%	100%	21.8	5.5%	100%



Electricity generation from wind power	351	87.8%	86%	351	87.8%	86%
Electricity generation from hydropower	19.7	4.9%	0%	19.7	4.9%	0%
Storage of electricity	5.67	1.4%	100%	5.67	1.4%	100%
Clean transportation						
Low-carbon transport infrastructure	1.52	0.4%	28%	1.52	0.4%	28%
Total	400	100%		400	100%	

Source: Latvenergo EuGB allocation report (August 2026)

UoP – Assessment of Alignment With European Green Bond Factsheet

The following table shows our assessment of the alignment of the projects financed within each UoP with the Latvenergo's EuGB factsheet published on 13 October 2025.



UoP	Category	Eligibility criteria from EuGB factsheet	Versus EuGB factsheet	Comments	NACE codes
Renewable energy					
Electricity generation from solar PV technology	Capex	Construction, operation, installation, maintenance and repair activities dedicated to generating electricity using solar PV.	✓	The financed solar PV projects meet all of the relevant requirements of the EU taxonomy. The group operated 22 solar parks across the Baltic states, with a total installed capacity of 354MW as of end-2025. It is currently constructing three more, with a combined capacity of 336MW, in Latvia and Lithuania.	D35.11 and F42.22
Electricity generation from wind power	Capex	Construction, operation, installation, maintenance and repair activities dedicated to generating electricity using wind.	✓	The financed wind power projects meet all of the relevant requirements of the EU taxonomy. The group's total wind power generation capacity was 145MW at end-2025, consisting of the 124MW Telšiai and 20MW Akmenė plants in Lithuania, and the 1MW Ainazi plant in Latvia. It expects five further wind farms, in Latvia and Lithuania, and with a combined capacity of 310MW, to commence production in 2026 and 2027.	D35.11 and F42.22
Electricity generation from hydropower	Opex	Construction, operation, installation, maintenance and repair activities dedicated to generating electricity using hydropower.	✓	The financed hydropower operations meet all of the relevant requirements of the EU taxonomy. Latvenergo's HPPs have a total installed capacity of 1,560MW, supporting renewable electricity generation.	D35.11 and F42.22
Storage of electricity	Capex	Construction and operation of facilities that store electricity and return it at a later time in the form of electricity.	✓	The financed BESS projects meet all of the relevant requirements of the EU taxonomy. It has completed two BESS projects with a combined capacity of 10.6MW and 21.9MWh, and is developing six more with a total capacity of 183MW and 429MWh. BESS supports grid flexibility and renewable integration.	D35.16



Clean transportation				
Low-carbon transport infrastructure	Opex	Construction, modernisation, maintenance and operation of infrastructure that is required for zero tailpipe CO ₂ operation of zero-emissions road transport; infrastructure dedicated to transshipment; and infrastructure required for operating urban transport. The infrastructure is not dedicated to the transport or storage of fossil fuels.	✓ The financed electric vehicle charging infrastructure meets all of the relevant requirements of the EU taxonomy. It had installed 1,107 installed charging points at Elektrum Drive stations by end-2025. The Elektrum Drive app also allows customers to access partner charging stations, bringing the total number of available charging points across the Baltic region to 1,590.	D35.15

We consider, based on the information provided by Latvenergo, the financed and refinanced projects to comply with the eligibility criteria of the factsheet. The construction, operation, installation, maintenance and repair of solar PV plants in Latvia and Lithuania, wind power plants in Latvia and Lithuania, the HPPs in Latvia, BESS projects in Latvia and Lithuania, and low-carbon transport infrastructure in Latvia are all eligible under the economic activities in Latvenergo's EuGB factsheet from October 2025.

Latvenergo allocated proceeds to five of the six UoP categories in the factsheet, with no proceeds being allocated to projects aligned with EU taxonomy activity 4.9 "transmission and distribution of electricity" in the reporting period.

As Latvenergo's factsheet indicated, it allocated all of the proceeds to environmentally sustainable activities under Article 3 of Regulation (EU) 2020/852, targeting the climate change mitigation objective under Article 9, with no allocation to transitional activities, nuclear energy, fossil gas, or economic activities not aligned with the technical screening criteria of the EU taxonomy.



UoP – Assessment Versus EU Taxonomy

The following table shows our assessment of the alignment of the projects financed within each UoP with the EU taxonomy.



Summary Table

UoP	Allocation (%)	E/T	Technical Screening Criteria (TSC)												MS	Full Alignment	
			SCC						DNSH								
			EO1	EO2	EO3	EO4	EO5	EO6	EO1	EO2	EO3	EO4	EO5	EO6			
Renewable energy																	
4.1 Electricity generation using solar photovoltaic technology	5.5		✓	—	—	—	—	—	—	✓	—	✓	—	✓	✓	✓	
4.3 Electricity generation from wind power	87.8		✓	—	—	—	—	—	—	✓	✓	✓	—	✓	✓	✓	
4.5 Electricity generation from hydropower	4.9		✓	—	—	—	—	—	—	✓	✓	—	—	✓	✓	✓	
4.10 Storage of electricity	1.4	E	✓	—	—	—	—	—	—	✓	✓	✓	—	✓	✓	✓	
Clean transportation																	
6.15 Infrastructure enabling low-carbon road transport and public transport	0.4	E	✓	—	—	—	—	—	—	✓	✓	✓	✓	✓	✓	✓	
															Overall instrument alignment EU Taxonomy Aligned %		✓ 100%
Key																	
✓ Fully aligned with the requirements									UoP Use of proceeds								
✗ Not aligned with the requirements									E Enabling, as per EU Taxonomy Compass								
— No applicable requirements									T Transitional, as per EU Taxonomy Compass								
									SCC Substantial contribution criteria								
									DNSH Do no significant harm criteria								
									MS Minimum safeguards								

Source: Sustainable Fitch



EU Taxonomy Assessment

EU Environmental Objectives: climate change mitigation (EO1); climate change adaptation (EO2); sustainable use and protection of water and marine resources (EO3); transition to a circular economy, waste prevention and recycling (EO4); pollution prevention and control (EO5); protection of healthy ecosystems (EO6)

Use of Proceeds	Renewable energy
Contribution to EU Environmental Objectives (EO)	EO1
Applicable Economic Activity	4.1 Electricity generation using solar photovoltaic technology 4.3 Electricity generation from wind power 4.5 Electricity generation from hydropower 4.10 Storage of electricity
Substantial Contribution Criteria (SCC)	Yes. We consider the financed projects under this UoP to be aligned with the SCC for EO1. The funded solar PV projects cover construction, operation, installation, maintenance and repair activities dedicated to solar PV generation in Latvia and Lithuania, within the group's portfolio of 22 operating solar parks (354MW) and further three parks (336MW) under construction. Electricity generation from solar PV substantially contributes to climate change mitigation on an unconditional basis, without needing to meet additional thresholds; so the funded solar PV projects meet the SCC. The funded wind power projects cover construction, operation, installation, maintenance and repair activities relating to wind power generation in Latvia and Lithuania, within the group's 145MW capacity, covering the 124MW Telšiai plant and the 20MW Akmenė plant in Lithuania, as well as a further 310MW across five wind farms scheduled to commence production in 2026 and 2027. As with solar PV, wind power substantially contributes to climate change mitigation on an unconditional basis, so the funded wind projects meet the SCC. The funded hydropower projects cover Latvenergo's hydropower portfolio, which has a total capacity of 1,560MW. Latvenergo confirms its plants meet one of the SCC, as the power density of the facilities exceeds 5W/sqm. It calculates power density as the ratio of installed capacity to the surface area of the reservoir used for electricity generation, in line with the SCC. This indicates the facilities efficiently use land and water resources, and have a favourable balance between generation capacity and environmental footprint. The HPPs use artificial reservoirs, so do not qualify as run-of-river installations. Latvenergo funded two BESS projects under this UoP, which qualify as an enabling activity under activity 4.10; they also substantially contribute to climate change mitigation. The proceeds funded projects related to the two BESS installations built during the reporting period, with a capacity of 10.6MW and 21.9MWh. Latvenergo's current storage assets comprise BESS only, which store and return energy without converting it to a chemical carrier such as hydrogen or ammonia, so are not subject to the taxonomy's criteria for chemical storage mediums.
Do No Significant Harm (DNSH)	EO1 n.a.
	EO2 Yes. We consider the financed projects under this UoP to be aligned with the DNSH criteria for EO2, which cover the solar PV, wind, hydropower and electricity storage activities. Latvenergo conducted a robust climate risk and vulnerability assessment that aligns with the requirements of Appendix A to Commission Delegated Regulation (EU) 2021/2139. The company identified the physical climate risks material to each activity through a structured process covering hazard identification and vulnerability analysis, considering exposure, sensitivity and adaptive capacity, and taking into account the geographic location, technical characteristics and expected operational lifetime of each asset. The assessment identified relevant acute risks (including storms, extreme precipitation, heatwaves, cold spells and icing) and chronic risks (including long-term changes in temperature, wind patterns, precipitation regimes and hydrological variability). The company used climate projections developed by the Latvian Environment, Geology and Meteorology Centre, which are based on the Intergovernmental Panel on Climate Change's (IPCC) sixth assessment report (AR6) and the coupled model intercomparison project phase 6 (CMIP6), and are applied across multiple scenarios (shared socioeconomic pathways 1-2.6, 2-4.5 and 3-7.0) and short-, medium- and long-term time horizons, supported by internationally recognised methodologies including the IPCC AR6, Task Force on Climate-related Financial Disclosures recommendations and the European Commission's climate hazard classification. This confirms that Latvenergo used up-to-date data and state-of-the-art science for the vulnerability and risk analysis. Latvenergo has also implemented a set of physical and non-physical adaptation measures to address the identified risks that are material to it, including infrastructure resilience improvements, operational and business-continuity planning, real-time monitoring and early warning systems, preventive maintenance and workforce preparedness, and integration of climate considerations into investment planning and asset design. It intends for these measures to reduce its vulnerability to the



EU Taxonomy Assessment

EU Environmental Objectives: climate change mitigation (EO1); climate change adaptation (EO2); sustainable use and protection of water and marine resources (EO3); transition to a circular economy, waste prevention and recycling (EO4); pollution prevention and control (EO5); protection of healthy ecosystems (EO6)

	identified hazards without leading to maladaptation or increasing climate risks elsewhere; they are subject to ongoing monitoring. Latvenergo identified, based on the assessment, no material and unmitigated physical climate risks for the assessed activities, and concluded that it manages residual risks at an acceptable level through the implemented adaptation measures. The company further confirms that it will expand the assessment in the 2026 reporting period to include supply-chain impacts and long-term cumulative risks.
EO3	Yes. We consider the financed projects under this UoP to be aligned with the DNSH criteria for EO3, which cover the wind, hydropower and electricity storage projects. Latvenergo's allocation report confirmed that it has no implemented or planned offshore wind projects, so the provisions relating to marine environmental impacts, including those concerning underwater noise and energy emissions, are not applicable to the assessed projects. It used proceeds entirely for the refinancing of existing, operating HPPs, whose alignment with the DNSH criteria we assessed and confirmed in our Pre-Issuance Review. The allocation report does not contradict information presented there, so we assess the funded plants as meeting the DNSH criteria. Latvenergo operates its HPPs in line with national water management legislation and in compliance with Directive 2000/60/EC (the Water Framework Directive), including Article 4. Latvenergo operates each facility under a valid water use permit issued by the state environmental service, which defines binding operational and environmental conditions to ensure sustainable water use and the protection of water bodies. Latvenergo governs the plants' operational regimes through approved reservoir management rules and hydrotechnical safety programmes covering water-level management, flow regulation, monitoring obligations and emergency procedures. It regulates water levels and discharges to maintain hydrological stability and prevent abrupt changes that could negatively affect the ecological status of the affected water bodies, and monitors these in line with permit conditions, regularly measuring water levels and discharge volumes, and reporting to competent authorities. Latvenergo has confirmed that sediment flows do not represent a significant concern at its HPPs, given the specific characteristics of the affected water bodies, the hydraulic head and the operational conditions of the plants, with the situation subject to ongoing regular monitoring. Latvenergo operates the plants within an integrated river-basin management framework and does not permanently compromise the achievement of good ecological status or potential. Latvenergo's allocation report also includes measures supporting aquatic biodiversity that are relevant to EO3, which include annual contributions to fish-stock restoration in the Daugava River Basin, release of juvenile fish, installation of artificial spawning nests, habitat improvements in tributaries, riverbed restoration works, and cooperation with scientific institutions under the Daugava Basin Action Plan to improve conditions for migratory fish. Latvenergo has confirmed that its HPP reservoirs are classified as heavily modified water bodies; the company is not obligated to install fish migration structures due to the historical loss of major fish habitats, according to expert evaluations and regulatory decisions. The natural fish migration ecosystems are no longer present in these heavily modified water bodies, so such measures are not relevant under the applicable criteria. Latvenergo has nonetheless voluntarily conducted research into opportunities to restore fish migration and habitats in certain tributaries; to date, the findings have not demonstrated that such measures would deliver meaningful ecological benefits or be suitable for the current ecosystem. We consider these measures to represent an ecologically appropriate approach to supporting aquatic biodiversity in these established reservoir systems, taking into account the characteristics of the affected water bodies and the applicable DNSH criteria. We consider the DNSH criteria for EO3 to not be applicable to the financed BESS projects, as confirmed by Latvenergo. The BESS projects do not involve direct abstraction from, or discharge into, natural water bodies. Pumped hydropower storage is not included in the current asset base, which would otherwise be subject to the DNSH criteria under EO3 for activity 4.5.
EO4	Yes. We consider the financed projects under this UoP category to be aligned with the DNSH criteria for EO4, which cover the solar PV, wind and electricity storage projects. Latvenergo confirms that it selects PV modules and associated components for long service life, modularity and recyclability, which supports efficient maintenance, component replacement and material recovery. The modules are certified in accordance with the International Electrotechnical Commission's (IEC) IEC 61215:2021 (requirements for terrestrial PV modules) and IEC 61730:2023 (PV module safety qualifications) standards, ensuring their durability and safety, and indicating an expected operational lifetime of 25 years to 30 years. This also ensures key materials are suitable for disassembly and recycling at the



EU Taxonomy Assessment

EU Environmental Objectives: climate change mitigation (EO1); climate change adaptation (EO2); sustainable use and protection of water and marine resources (EO3); transition to a circular economy, waste prevention and recycling (EO4); pollution prevention and control (EO5); protection of healthy ecosystems (EO6)

	modules' end of life. The use of certified, high-quality and recyclable equipment demonstrates that the activity does not cause significant harm to EO4. The wind projects meet the same durability and recyclability requirements as the solar PV projects. Latvenergo integrates circular economy principles into the development of its wind parks; it selects equipment and components to ensure durability, recyclability and suitability for disassembly, refurbishment and material recovery at their end of life. The group aims for at least 90% of wind turbine materials to be recyclable at the end of their life cycle, and incorporates circular economy considerations, including material selection, design for disassembly and end-of-life management, into project development, the environmental impact assessment (EIA) process and supplier selection. Latvenergo confirms that, for BESS projects under this UoP, end-of-life handling of batteries and associated components is covered by contractual arrangements with licensed and certified waste management operators, together with documented procedures for disposal, recycling and recovery. It conducts all stages of the life cycle, including procurement, operation and decommissioning, in line with internal environmental and circular economy policies as well as applicable national and EU regulations, with financial provisions for recycling and recovery integrated into project planning and documented through internal procedures and verified contracts.
EO5	n.a.
EO6	Yes. We consider the financed projects under this UoP to be aligned with the DNSH criteria for EO6, which cover the solar PV, wind power, hydropower and BESS projects. Latvenergo carried out screening for its solar PV and BESS activities in line with the EU's EIA directive (Directive 2011/92/EU), with the BESS activities also meeting the criteria in Appendix D of the EU taxonomy. It determined that formal EIAs were not required for either project type. The screening confirmed a full EIA was unnecessary for the solar projects, while the BESS installations are not located within or in proximity to biodiversity-sensitive areas, including Natura 2000 sites, UNESCO World Heritage sites, key biodiversity areas or other protected areas. The company stated that it carries out targeted environmental assessments, and has implemented appropriate mitigation and compensation measures where projects are located within or near protected or environmentally sensitive areas. For projects outside such areas, the company performed internal environmental evaluations using available data, project-specific characteristics and recognised best practices, including alignment with the national Solar Park Environmental Planning Guidelines in Latvia for the solar projects. Latvenergo also applies ongoing environmental monitoring and adaptive management measures during operation to avoid significant negative impacts on biodiversity and ecosystems. Latvenergo carried out EIAs or screening procedures for wind projects, in line with Directive 2011/92/EU, to identify and assess potential impacts on biodiversity-sensitive areas. It integrated targeted assessments and mitigation or compensation measures into project planning where applicable. The funded wind parks are generally located outside Natura 2000 sites, EU priority habitats and micro-reserves. Nevertheless, Latvenergo assesses, during the EIA process, the wind farms' potential impacts on nearby protected areas and species of conservation concern, and applies precautionary measures, including operational restrictions to reduce bat mortality, bird protection systems and species-specific planning considerations. It has also implemented monitoring programmes for birds and bats, in cooperation with national environmental authorities, and both before and after the start of operations, to support adaptive management and timely mitigation. Latvenergo's HPPs operate in compliance with national environmental legislation and the requirements of Directive 2011/92/EU and Directive 2000/60/EC, indicating that it has assessed and manages environmental impacts through permitting requirements, defined operational regimes, reservoir management rules and hydrotechnical safety measures. Latvenergo has not installed fish migration structures, although it has mitigation and compensation measures to support aquatic biodiversity, including annual financial contributions for fish-stock restoration in the Daugava River Basin, releases of juvenile fish, installation of artificial spawning nests, habitat improvements in tributaries and riverbed restoration works, complemented by cooperation with scientific institutions under the Daugava Basin Action Plan.
Minimum Safeguard (MS)	Yes. We consider Latvenergo to be compliant with the minimum safeguard criteria. The group demonstrates alignment through adherence to internationally recognised standards, including the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, and the International Bill of Human Rights, which are embedded across its operations through a framework of internal policies. The group manages governance and risk through its corporate governance policy, risk management policy, fraud and corruption risk management policy, tax risk management procedures, and a policy on compliance with international and national sanctions. The code of ethics sets out standards for ethical conduct that apply to both employees and business partners, which are supported by a whistleblowing system aligned with the EU's whistleblowing directive (Directive 2019/1937). This system



EU Taxonomy Assessment

EU Environmental Objectives: climate change mitigation (EO1); climate change adaptation (EO2); sustainable use and protection of water and marine resources (EO3); transition to a circular economy, waste prevention and recycling (EO4); pollution prevention and control (EO5); protection of healthy ecosystems (EO6)

	provides multiple, continuously monitored reporting channels to allow anonymous or identified reporting of misconduct, with confidentiality protections and systematic reviews by the responsible unit. Latvenergo promotes fair and inclusive treatment of the workforce through its human resource management, occupational safety, remuneration and sustainability policies, which collectively support non-discrimination, freedom of association, safe working conditions and ethical conduct. The group does not maintain a standalone policy for vulnerable groups, although it has included principles for inclusion and non-discrimination within its code of ethics and the human resource management policy, which is a position the group discloses transparently and is consistent with the minimum safeguards, as a dedicated policy is not required. Latvenergo governs supplier relationships through the procurement policy, the rules governing the organisation of procurement, and the suppliers code of conduct. These set its expectations on human rights, community impact and ethical conduct. It applies supplier due diligence on a risk basis, with particular attention to areas of elevated human rights risk. The company disclosed that it identified no material human rights risks during the reporting period, although it did not conduct audits relating to human rights issues at suppliers. We consider this to be a risk-based approach to be consistent with the proportionality principle underlying the OECD due-diligence expectations, as it is based on the group's risk assessment. The company's engagement with affected communities, including Indigenous peoples, is defined through its sustainability policy, environmental and energy management policy, and suppliers code of conduct; these ensure clear communication, public consultations and educational initiatives on energy and sustainability.
Full Alignment	
Use of Proceeds	Clean transportation
Contribution to EU Environmental Objectives (EO)	EO1
Applicable Economic Activity	6.15 Infrastructure enabling low-carbon road transport and public transport
Substantial Contribution Criteria (SCC)	Yes. We consider the financed low-carbon transport infrastructure projects under this UoP to be aligned with the SCC for EO1. Latvenergo's Elektrum Drive brand develops and operates an electric vehicle charging network across Latvia, Lithuania and Estonia. It covered 1,107 charging stations owned by Latvenergo as of end-2025, with 1,590 being accessible via the Elektrum Drive app and partner stations. The funded projects meet point 1(a) of the SCC, as the infrastructure is dedicated exclusively to the operation of vehicles with zero tailpipe CO₂ emissions. Latvenergo also confirmed the infrastructure is not to be used for the transport or storage of fossil fuels, thereby also satisfying point 2 of the SCC.
Do No Significant Harm (DNSH)	EO1 n.a.
	EO2 Yes. We consider the financed low-carbon transport infrastructure projects under this UoP to be aligned with the DNSH criteria for EO2. We confirm Latvenergo meets the relevant DNSH requirements for EO2, for the reasons laid out in the "renewable energy" UoP category.
	EO3 Yes. We consider the financed low-carbon transport infrastructure projects under this UoP to be aligned with the DNSH criteria for EO3. The activity complies with the criteria set out in Appendix B of the EU taxonomy; Latvenergo identifies and addresses environmental risks related to water quality through appropriate planning and design measures. Development and operation of electric vehicle charging infrastructure involve minimal water use and do not include discharges into, or interaction with, marine environments, resulting in negligible risk to water bodies. The activity is not subject to an EIA under Directive 2011/92/EU, although Latvenergo applies relevant water protection considerations to ensure it does not compromise the achievement of good water status and ecological potential, including through the use of impermeable surfaces, appropriate drainage systems and avoidance of construction in sensitive aquatic areas.



EU Taxonomy Assessment

EU Environmental Objectives: climate change mitigation (EO1); climate change adaptation (EO2); sustainable use and protection of water and marine resources (EO3); transition to a circular economy, waste prevention and recycling (EO4); pollution prevention and control (EO5); protection of healthy ecosystems (EO6)

	EO4	Yes. We consider the financed low-carbon transport infrastructure projects under this UoP to be aligned with the DNSH criteria for EO4. The DNSH criteria require that at least 70% (by weight) of non-hazardous construction and demolition waste that is generated on-site be prepared for reuse, recycling or other material recovery, in line with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol. Latvenergo implements preventive and recovery-focused measures to minimise waste generation and promote reuse, recycling and material recovery across all project locations in Latvia, Lithuania and Estonia, which are managed through contracts with licensed waste operators providing traceability and documentation. On this basis we consider the activity to be aligned with the DNSH criteria. Latvenergo confirmed that its relevant facilities continued to meet the recovery threshold throughout the investments covered by its allocation report. The company's waste management practices ensure that at least 70%, by weight, of non-hazardous construction and demolition waste generated during the project is prepared for reuse, recycled or otherwise recovered, in accordance with the requirements of Article 11(2)(b) of the EU Waste Framework Directive 2008/98/EC and its transposition into national waste legislation.
	EO5	Yes. We consider the financed low-carbon transport infrastructure projects under this UoP to be aligned with the DNSH criteria for EO5. Latvenergo confirms that it carries out construction and maintenance works using low-emissions machinery, and that it uses controlled material handling to limit noise, dust and pollutant emissions. It manages the potential impact of potential noise and vibration during construction through planning, site layout and work scheduling. The company also confirms that its works use best-available techniques and established environmental standards to ensure minimal impact on air quality, soil and the surrounding environment throughout the project life cycle.
	EO6	Yes. We consider the financed low-carbon transport infrastructure projects under this UoP to be aligned with the DNSH criteria for EO6. Latvenergo considers the construction and operation of electric vehicle charging infrastructure to not pose significant risks to biodiversity or ecosystems. The company nonetheless confirms that it implements measures to avoid harm to local habitats and species during construction and operation, and that it carries out vegetation maintenance to prevent the spread of invasive species and support ecological balance, in line with the DNSH requirements for invasive-species control and wildlife-collision mitigation.
Minimum Safeguard (MS)	Yes.	We consider Latvenergo to be compliant with the minimum safeguards, for the reasons laid out in the "renewable energy" UoP category.
Full Alignment		

Source: Sustainable Fitch

Appendix A: Other Services Sustainable Fitch has Provided to the Assessed Entity

European Green Bond Assessment

With this report, Sustainable Fitch is providing a European Green Bond Assessment to the assessed entity, as identified on page 1.

Sustainable Fitch has also provided the following services or products to the same entity:

- Primary Market Review. Unsolicited. Published on 03 November 2025 and 15 June 2026.
- European Green Bond Assessment (Pre-Issuance Review). Solicited. Published 13 October 2025.
- Entity and Framework Ratings, dated 11 February 2026. Unsolicited.

Sustainable Fitch has not provided any other service or product.



SOLICITATION STATUS

The Post-Issuance Review was solicited and assigned or maintained by Sustainable Fitch at the request of the entity.

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