



Luxembourg, 11.12.2024

Environmental and Social Data Sheet

Overview

Project Name:	DB IFL RENEWABLE ENERGY AND ENERGY EFFICIENCY EU
Project Number:	2024-0436
Country:	Regional - EU countries
Project Description:	Intermediated Framework Loan to support Deutsche Bank in the financing of Renewable Energy and Energy Efficiency projects in the European Union-

EIA required: Some of the underlying schemes may require an EIA.

Project included in Carbon Footprint Exercise¹: no

(details for projects included are provided in section: "EIB Carbon Footprint Exercise")

Environmental and Social Assessment

Environmental Assessment

The proposed operation is a Framework Loan (FL) to Deutsche Bank as Financial Intermediary (the "FI" or "DB"). The loan is for an amount of up to EUR 500m to finance renewable energy and energy efficiency projects in EU countries. The renewable energy schemes are expected to focus on mid-size solar PV, onshore wind, geothermal and biogas projects, while the energy efficiency schemes will include energy efficiency in buildings, street lighting and industrial/SMEs production facilities.

The project is in line with the Bank's priority lending objectives for renewable energy (RE) and energy efficiency (EE) and supports the Climate Action objective (100%). The operation would contribute to EU energy objectives and support the implementation of the Energy Performance of Buildings Directive (EPBD) and the Energy Efficiency Directive (EED).

For all schemes included under this operation, the FI applies a comprehensive ESG policy, including reporting and monitoring, making available to the public annual reporting on sustainable activities. The capacity of the FI to carry out environmental and social assessment of projects in line with the Bank's requirements and the national legislation has been appraised and is deemed satisfactory.

Most of the RE/RE individual schemes to be financed are likely to have limited negative environmental impacts / temporary inconveniences due to construction works (dust, noise), which are expected to be mitigated appropriately.

Renewable Energy Projects

Due to their technical characteristics, some of the renewable energy investments are expected to fall under Annex II of Directive 2011/92/EU as amended by EIA Directive 2014/52/EU, leaving it to the national competent authority to determine according to Annex III of the said Directive whether an environmental impact assessment is required.

¹ Only projects that meet the scope of the Carbon Footprint Exercise, as defined in the EIB Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: 20,000 tonnes CO₂e/year absolute (gross) or 20,000 tonnes CO₂e/year relative (net) – both increases and savings.



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In case an EIA is required, the Bank will require the Financial Intermediary (FI) to store and keep updated any documents that may be relevant for the project (including EIA screening decisions, environmental studies, environmental monitoring reports or equivalent documents) supporting the compliance with the EIA Directive and national environmental regulations, and to promptly deliver such documents to the Bank upon request.

The FI, which is known to the EIB from previous operations, will be required to ensure the compliance of all schemes with relevant EU Directives as transposed into national legislation. The FI will be required to verify that none of the schemes has a significant adverse impact on any site forming part of the EU Natura 2000 network (falling under Habitats Directive 92/43/EEC or Birds Directive 2009/147/EC). Schemes with significant negative impacts on areas with high biodiversity value, nature conservation areas, including bird migration routes, shall not be eligible.

Energy Efficiency projects

The energy efficiency measures will contribute to reducing energy consumption, GHG emissions and subsequent running costs.

The energy efficiency schemes will be required to comply with the Energy Performance of Buildings Directive² as transposed by the national legislations. Given their scale, location in built-up urban areas and nature, the energy efficiency schemes of this operation are not expected to require an Environmental Impact Assessment (EIA).

Asbestos risk will be assessed and mitigated by the final beneficiaries/contractors in line with regulatory requirements of the respective countries.

EIB Paris Alignment for Counterparties (PATH) Framework

Deutsche Bank (DB) is in scope of the PATH framework and screened-in for the low carbon aspects of PATH (>EUR 30bn total assets for low carbon only). Deutsche Bank publishes a dedicated reporting in accordance with the recommendation of TCFD (the 2023 report is available at the following link [Non-Financial-Report-2023.pdf \(db.com\)](#)). On this basis, DB meets the PATH requirements. No additional contractual undertakings will be required.

Social Assessment, where applicable

Regarding the renewable energy projects, the FI will be required to undertake reasonable efforts in case of concern to mitigate against the risk of forced labour in the solar PV supply chain. This will include enhanced due diligence where practically achievable and ensuring that relevant obligations are passed on in supplier contracts.

The building refurbishments generate local economic activity and contribute to employment generation. The investments will generate social benefits, in terms of supporting better health through improving indoor air quality and supporting employment generation.

Conclusions and Recommendations

The FI is considered to have the expertise and the capabilities to verify the environmental procedures carried out for individual schemes, appropriately addressing environmental issues and ensuring that the schemes to be part-financed under this framework loan comply with national and EU legislation.

If a scheme falls under Annex I or Annex II of the EIA Directive, the FI shall ensure that the sub-project's promoters comply with the provisions of the EIA Directive as transposed into national law. When relevant, the FI shall deliver to the Bank the EIA report and other relevant

² Directive (EU) 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings amending Directive (EU) 2018/844 of the European Parliament and of the Council of 30 May 2018, Directive 2010/31/EU on the energy performance of buildings and Directive 2012/27/EU on energy efficiency



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environmental documents. For each scheme that may have an impact on a nature conservation site, the Financial Intermediary shall obtain confirmation from the competent nature conservation authority, or an equivalent assessment satisfactory to the Bank, that the scheme does not have a significant negative impact on any site of nature conservation importance.

The FI will be required to ensure that where and when applicable, asbestos risk will be assessed and mitigated by the final beneficiaries/contractors in line with regulatory requirements of the respective countries.

The FI will be required to undertake, on a best effort basis, to perform enhanced due diligence of the supply chain of the solar PV module manufacturers (supply chain mapping of the solar PV module manufacturers reaching the level of silicon/polysilicon suppliers and/or declarations by the PV module manufacturers concerning the origin of the components used in the PV modules, per sub-project), also guided by the FI's human rights commitment, and ensuring that appropriate contractual provisions are cascaded to contractors/suppliers of the sub-projects.

Under these conditions, the operation is acceptable to the Bank in E&S terms.