

Fortum Oyj

Pre-Issuance Review – European Green Bond Assessment

Fortum Oyj is an energy company that operates power plants, and generates and sells electricity and heat. It is majority owned by the Finnish state (51%). The issuer has published a factsheet to issue European Green Bonds (EuGBs) under Regulation (EU) 2023/2631. The use of proceeds (UoP) categories included in the factsheet align with EU Taxonomy Regulation (EU) 2020/852. Transactions under the EuGB factsheet are also aligned with the core pillars of the ICMA Green Bond Principles.

Alignment of Factsheet and Transactions



Alignment of factsheet with Regulation (EU) 2023/2631 and Regulation (EU) 2020/852 ^a	Alignment of transactions with ICMA Green Bond Principles
3.10 Manufacture of hydrogen 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 4.11 Storage of thermal energy 4.15 District heating/cooling distribution 4.16 Installation and operation of electric heat pumps 4.25 Production of heat/cool using waste heat 4.26 Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle 4.27 Construction and safe operation of new nuclear power plants 4.28 Electricity generation from nuclear energy in existing installations	Renewable energy Energy efficiency

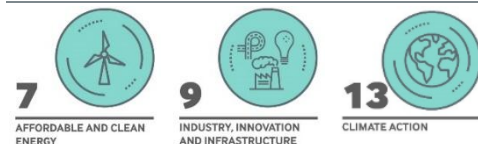
^aFor the full EU taxonomy analysis, refer to p.8.

Key Debt Details

Issuance date:	As indicated in the applicable bond documentation for individual transactions, or on the issuer's website.
Factsheet publication date:	1 July 2026
Instrument type:	Bond
Instrument label^b:	Green
ISIN:	ISIN(s) will be indicated in the applicable bond documentation or on the issuer's website.
Issuer Legal Name:	Fortum Oyj
LEI:	635400IUZZIJSAMF76
External Reviewer: ESMA registered in accordance with Article 22 of the EuGB Regulation	Sustainable Fitch Ireland Limited Register Number: 717976 LEI: 213800JBPPIRON5YQ587 Registered Office: 88 Harcourt Street, Dublin 2, D02 DK18, Ireland

^bAs defined by issuer.

Relevant UN Sustainable Development Goals



European Green Bond Assessment



Date assigned	1 July 2026
Framework Type	European Green Bond
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

Index

Key Drivers and Summary	2
European Green Bond Assessment	8
Appendices	26

Analysts

Che Nabeta
Senior Analyst
+44 20 3530 1137
che.nabeta@sustainablefitch.com

Saga Rad
Director
+44 20 3530 1471
saga.rad@sustainablefitch.com

Approver

Antoine Corbin
Senior Director
+44 20 3530 1339
antoine.corbin@sustainablefitch.com

Media Contact

Tahmina Pinnington-Mannan
+44 20 3530 1128
tahmina.pinnington-mannan@thefitchgroup.com



European Green Bond Pre-issuance Review Summary

Factsheet sections	Alignment	Key Drivers
General Information		<ul style="list-style-type: none"> Fortum intends to issue EuGBs aligned with Regulation (EU) 2023/2631, with the intention to finance fully taxonomy-aligned activities within the following categories: <ul style="list-style-type: none"> 3.10 “manufacture of hydrogen”; 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”; 4.11 “storage of thermal energy”; 4.15 “district heating/cooling distribution”; 4.16 “installation and operation of electric heat pumps”; 4.25 “production of heat/cool using waste heat”; 4.26 “pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle”; 4.27 “construction and safe operation of new nuclear power plants”; 4.28 “electricity generation from nuclear energy in existing installations”. Sustainable Fitch conducted a pre-issuance external review of Fortum’s EuGB factsheet, with a focus on assessing the alignment of the factsheet with Regulation (EU) 2023/2631 and of the included economic activities with Regulation (EU) 2020/852 (the EU taxonomy). We have identified no conflicts of interest related to us providing the external review.
Introductory Statement		<ul style="list-style-type: none"> We have assessed the completed EuGB factsheet, as laid down in Annex I to Regulation (EU) 2023/2631 of the European Parliament and of the Council. We consider transaction(s) under the EuGB factsheet to be aligned with Regulation (EU) 2023/2631. This review represents an independent opinion of the external reviewer, and is to be relied upon only to a limited degree.
Statement on the Alignment of UoP with Regulation (EU) 2020/852		<ul style="list-style-type: none"> We consider that the UoP is aligned with Regulation (EU) 2020/852.
Sources, Assessment Methodologies and Key Assumptions		<ul style="list-style-type: none"> Fortum EuGB factsheet Fortum financials 2025 EU Taxonomy Compass Sustainable Fitch European Green Bond Assessment and EU Taxonomy – Methodology (13 December 2024)
Assessment and Opinion		<ul style="list-style-type: none"> The quality of information provided by the issuer is sufficient to perform the review. The issuer demonstrates alignment with Article 4 of Regulation (EU) 2023/2631, as it discloses that the bond proceeds are intended to finance the group's taxonomy-aligned expenditures under the gradual approach. The option to use flexibility permitting partial non-alignment with the technical screening criteria, as set forth in Article 5 of Regulation (EU) 2023/2631, has not been exercised in this issuance. The provisions of Article 6 of Regulation (EU) 2023/2631 regarding the allocation of proceeds of financial assets are not applicable to this issuance. The requirement to publish a capex plan, as referred to in Article 7 of Regulation (EU) 2023/2631, is not applicable to this issuance. The issuer demonstrates alignment with Article 8 of Regulation (EU) 2023/2631, as it discloses that the bond proceeds are expected to finance assets and expenditures, which are aligned with the technical screening criteria and minimum safeguards of the EU taxonomy applicable at the time of issuance.
Any Other Information		<ul style="list-style-type: none"> n.a.

ICMA Green Bond Principles Alignment Summary



Pillar	Alignment	Key Drivers
Overall	Excellent	<ul style="list-style-type: none"> We confirm that this programme to issue EuGB transactions also complies with the four pillars of the ICMA Green Bond Principles (2025 version with the June 2022 appendix), namely UoP, process for project evaluation and selection, management of proceeds and reporting.
Use of Proceeds	Excellent	<ul style="list-style-type: none"> We consider the eligible UoP categories in Fortum's factsheet to have an excellent environmental impact by complying with the technical screening criteria and contributing to the EU taxonomy's climate change mitigation objective. The UoP categories are aligned with relevant green project categories of the ICMA Green Bond Principles such as renewable energy and energy efficiency. Nuclear-related activities do not have an assigned ICMA category but have demonstrated strong environmental impact through EU taxonomy alignment, and we consider them as green under the same principles.
Use of Proceeds – Other Information	Good	<ul style="list-style-type: none"> We view it positively that the factsheet effectively excludes controversial projects from allocation through its compliance with the EuGB standard, whereby only projects meeting stringent technical screening criteria are eligible for funding. The factsheet's lookback period is compliant with EuGB standard requirements: no specific lookback period is defined for capex, while opex is subject to a three-year lookback period. We view this as in line with standard market practice. Fortum's factsheet does not specify whether proceeds will be allocated to new investments or to the refinancing of existing projects, which somewhat constrains our assessment. However, the breakdown of proceeds between financing (in the year of issuance or after the year of issuance) and refinancing will be disclosed in the EuGB allocation reporting.
Evaluation and Selection	Excellent	<ul style="list-style-type: none"> We view it positively that the issuer has robust systems for project evaluation and selection, led by its green finance committee. Fortum's project evaluation and selection process is single-layered and chaired by its treasury department. The green finance committee, together with finance and sustainability teams, is responsible for identifying assets and expenditures associated with EU taxonomy-aligned economic activities for the issuance of EuGBs and for ensuring continued compliance with the EU Taxonomy Regulation.
Management of Proceeds	Good	<ul style="list-style-type: none"> Fortum will use a dedicated green register to manage proceeds raised from issuances under its factsheet. Additionally, unallocated proceeds will be held in cash or other short-term, liquid instruments. These commitments are in line with standard market practices. However, we view definite segregation of funds as market best practice. Allocations may be updated, as appropriate, in the event of divestments, decommissioning or similar events.
Reporting and Transparency	Excellent	<ul style="list-style-type: none"> Fortum will publish allocation and impact reporting in accordance with Articles 11 and 12 of the EuGB Regulation. After full allocation of an amount equivalent to the proceeds of each EuGB, and at least once during the lifetime of the bonds, Fortum will publish an impact report. Allocation reporting will be conducted annually until full allocation of the proceeds of the relevant EuGB and aligned with the calendar year. Fortum will provide allocation and impact reporting at the level of the underlying economic activities or, on a best-effort basis, at a project-by-project level, including information on amounts allocated and environmental impacts. We view project-level reporting as market best practice.



Use of Proceeds Summary

Green	Description	ICMA category	EU compass sector and activity	NACE code
UoP 1	Manufacture of hydrogen	Energy efficiency	3.10 “manufacture of hydrogen”	C20.11
UoP 2	Solar power	Renewable energy	4.1 “electricity generation using solar photovoltaic technology”	D35.11, F42.22
UoP 3	Wind power	Renewable energy	4.3 “electricity generation from wind power”	D35.11, F42.22
UoP 4	Hydropower	Renewable energy	4.5 “electricity generation from hydropower”	D35.11, F42.22
UoP 5	Storage of electricity	Energy efficiency	4.10 “storage of electricity”	n.a.
UoP 6	Storage of thermal energy	Energy efficiency	4.11 “storage of thermal energy”	n.a.
UoP 7	District heating distribution	Energy efficiency	4.15 “district heating/cooling distribution”	D35.30
UoP 8	Installation and operation of electric heat pumps	Energy efficiency	4.16 “installation and operation of electric heat pumps”	D35.30, F43.22
UoP 9	Production of heat and cool from waste heat	Energy efficiency	4.25 “production of heat/cool using waste heat”	D35.30
UoP 10	Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle	n.a.	4.26 “pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle”	D35.11, F42.22
UoP 11	Construction and safe operation of new nuclear power plants	n.a.	4.27 “construction and safe operation of new nuclear power plants, for the generation of electricity and/or heat, including for hydrogen production, using best-available technologies”	D35.11, F42.22
UoP 12	Nuclear energy (existing installations)	n.a.	4.28 “electricity generation from nuclear energy in existing installations”	D35.11, F42.22

Note: n.a. – not applicable.

Source: Sustainable Fitch, EU Taxonomy Compass, Eurostat

Factsheet and Transaction Highlights

Intended allocation approach:	Gradual approach
UoP intended for activities that are environmentally sustainable ^a	100% of the bond proceeds

UoP breakdown	Expected
Fixed assets, capex and opex	Unknown at pre-issuance

^a Under Article 3 of Regulation (EU) 2020/852.
Source: Fortum EuGB factsheet

Fortum's sustainability strategy is fully embedded within its overarching corporate strategy and structured around three core priorities: delivering reliable energy to customers, driving decarbonisation in industries, and transforming and developing the business.

In practical terms, this translates into maintaining and optimising its low-carbon generation base, expanding renewable energy capacity, enabling electrification of industrial processes, and improving operational efficiency.

Fortum positions itself as a partner to industrial customers, helping them reduce emissions through access to low-carbon electricity and energy solutions, while also modernising its own asset base to reduce environmental impacts.

Fortum's sustainability strategy is supported by its plans to issue its first EuGB, to finance investments aligned with the environmental objective of climate change mitigation under Article 9 of the EU taxonomy.

Fortum's 2025 financials outlined committed capex of around EUR2 billion for 2026–2030, with the potential to invest an additional EUR2.5 billion should attractive opportunities arise. This capital allocation strategy is closely aligned with its decarbonisation objectives.

Fortum operated around 9GW of generation capacity (primarily hydro and nuclear) as of 2025; it is also a major district heating supplier, and invests in renewable power, energy storage, waste heat utilisation, electrified district heating and hydrogen development.

The EuGB factsheet includes 12 UoP categories mapped to the EU taxonomy objective of climate change mitigation.

Fortum intends to allocate the proceeds of the EuGBs within two years following the issuance date. Fortum will allocate an amount equivalent to the gross proceeds of each EuGB to EU taxonomy-aligned economic activities. Issuance costs will not be deducted from the proceeds. The breakdown of proceeds between financing (defined as investments in the year of issuance or after the year of issuance) and refinancing will be disclosed in the EuGB allocation reporting.

Fortum will clearly disclose, at the time of issuance, whether the proceeds of a specific EuGB are intended to be allocated, in whole or in part, to nuclear power generation activities.

We assessed the UoP categories disclosed in Fortum's EuGB factsheet against the EU taxonomy requirements. This included verifying alignment with the substantial contribution criteria (SCC), do no significant harm (DNSH) criteria and minimum safeguards.

We used issuer-provided information and relevant external information (such as from authorities) to assess alignment with the SCC across the categories. Our DNSH assessment considered the availability of clear metrics on performance, processes and proposed measures to limit harm to environmental objectives; compliance with key international standards and relevant legislation; and absence of controversies related to the activities. We verified compliance with the minimum safeguards by reviewing issuer-wide labour rights and governance policies and practices, and its adoption of relevant international guidelines and principles.

The assessment did not rely on assumptions, but on the issuer's disclosures and other public information to confirm alignment with the SCC, DNSH criteria and minimum safeguards.

Source: Sustainable Fitch, Fortum financials 2025

Entity Highlights

Turnover	Capex	Opex
EUR2,325 million (47%)	EUR386 million (61%)	EUR181 million (79%)
Taxonomy-aligned turnover, and proportion of turnover derived from taxonomy-aligned economic activities.	Taxonomy-aligned capex, and proportion of capex associated with taxonomy-aligned economic activities.	Taxonomy-aligned opex, and proportion of opex associated with taxonomy-aligned economic activities.

Source: Fortum financials 2025

Fortum is a Finnish energy company and one of the largest power producers in the Nordic region, with a core focus on low-carbon electricity generation and energy solutions. It is the third-largest power generator in the Nordic region and a major electricity retailer; it serves over 2 million retail customers across Finland, Sweden, Norway and Poland.

Its business model is centred on hydro and nuclear power generation, complemented by wind and solar development, district heating and cooling, and energy services for consumers and industrial clients. Fortum already operates from a highly decarbonised base, with around 99% of its power generation coming from renewable sources and nuclear energy. It aims to deliver reliable, low-carbon energy at scale while supporting decarbonisation of industries and broader society.

Its sustainability strategy is based on a clearly defined climate transition pathway that is aligned with the goals of the Paris Agreement and validated by the Science Based Targets initiative. Fortum has committed to achieving net-zero GHG emissions across its value chain by 2040 and to phasing out coal in its own operations by end-2027. It has also established a set of intermediate targets, including reducing the emissions intensity of both total energy production and power generation, which it met ahead of schedule in 2025.

It also has targets covering direct and indirect emissions, with significant reductions planned for Scopes 1, 2 and 3 emissions through to 2040. These climate goals are complemented by broader environmental objectives, including targets on biodiversity, pollution reduction and responsible supply chain management.

Fortum has committed to a high level of environmental and safety management, complies with all regulations, and has licence to operate each site. All Fortum's production sites are ISO 14001:2015 (covering environmental management systems) certified.

Fortum Oyj publishes information on its ESG performance. The Fortum 2025 financials report contains a sustainability statement that is prepared in accordance with the EU Corporate Sustainability Reporting Directive and the related European Sustainability Reporting Standards, and it also provides information on its sustainability initiatives and performance metrics.

Fortum's Science Based Targets initiative-aligned climate transition plan is consistent with a 1.5°C pathway, with Scopes 1, 2 and 3 emissions-reduction targets. The plan outlines actions to phase out fossil fuels, expand low-carbon and energy-efficient solutions, and electrify heat production. It is fully integrated into Fortum's strategy and overseen by the CEO and Fortum leadership team, with regular monitoring by the strategy and capital allocation committee. We expect the allocation of proceeds from its EuGBs to directly support the implementation of this transition plan.

Further information on Fortum's transition plan is publicly available on its website, and in its annual report.

Source: Sustainable Fitch, Fortum financials 2025



Relevant UN Sustainable Development Goals

- **7.1:** By 2030, ensure universal access to affordable, reliable and modern energy services.
- **7.2:** By 2030, increase substantially the share of renewable energy in the global energy mix.
- **7.3:** By 2030, double the global rate of improvement in energy efficiency.



- **9.1:** Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all.
- **9.4:** By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities.



- **13.2:** Integrate climate change measures into national policies, strategies and planning.



Source: Sustainable Fitch, UN



European Green Bond Assessment – Pre-Issuance Review

Introductory Statements | European Green Bond Assessment - Pre-Issuance Review

Sustainable Fitch has assessed the completed European Green Bond factsheet laid down in Annex I 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.

Alignment Statement

We consider transactions under the European Green Bond Factsheet to be aligned with Regulation (EU) 2023/2631 and the use of proceeds to be aligned with Regulation (EU) 2020/852.

Alignment with EU Taxonomy - Summary of criteria applied within the EU

UoP	E/T	Technical Screening Criteria												MS	Full Alignment	
		SCC						DNSH								
		EO1	EO2	EO3	EO4	EO5	EO6	EO1	EO2	EO3	EO4	EO5	EO6			
Manufacture of hydrogen		✓	–	–	–	–	–	–	✓	✓	–	✓	✓	✓	✓	✓
Solar power		✓	–	–	–	–	–	–	✓	–	✓	–	✓	✓	✓	✓
Wind power		✓	–	–	–	–	–	–	✓	–	✓	–	✓	✓	✓	✓
Hydropower		✓	–	–	–	–	–	–	✓	✓	–	–	✓	✓	✓	✓
Storage of electricity	E	✓	–	–	–	–	–	–	✓	✓	✓	–	✓	✓	✓	✓
Storage of thermal energy	E	✓	–	–	–	–	–	–	✓	–	✓	–	✓	✓	✓	✓
District heating distribution		✓	–	–	–	–	–	–	✓	✓	–	✓	✓	✓	✓	✓
Installation and operation of electric heat pumps		✓	–	–	–	–	–	–	✓	✓	✓	✓	✓	–	✓	✓
Production of heat and cool from waste heat		✓	–	–	–	–	–	–	✓	–	✓	✓	✓	✓	✓	✓
Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle		✓	–	–	–	–	–	–	✓	✓	✓	✓	✓	✓	✓	✓
Construction and safe operation of new nuclear power plants		✓	–	–	–	–	–	–	✓	✓	✓	✓	✓	✓	✓	✓
Nuclear energy (existing installations)		✓	–	–	–	–	–	–	✓	✓	✓	✓	✓	✓	✓	✓
Overall instrument alignment															✓	

Key

- ✓ Fully aligned with the requirements
- ✗ Not aligned with the requirements
- No applicable requirements

- UoP** Use of proceeds
- E** Enabling, as per EU Taxonomy Compass
- 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	UoP 1: Manufacture of hydrogen	
Contribution to EU Environmental Objectives (EOs)	EO1	
Applicable Economic Activity	<ul style="list-style-type: none"> 3.10 "Manufacture of hydrogen" 	
Substantial Contribution Criteria (SCC)	<p>Yes.</p> <p>We consider the issuer's assets and expenditures under this UoP to be aligned with the SCC for EO1.</p> <p>All of Fortum's new projects, upon reaching maturity, will undergo life-cycle GHG emission savings assessment in accordance with applicable guidelines, such as Directive (EU) 2018/2001 and relevant ISO standards. It will obtain third-party verification of the emissions savings. Only projects with life-cycle GHG emissions savings of 73.4% for hydrogen (resulting in life-cycle GHG emissions lower than 3tCO_{2e} per tonne of hydrogen) and 70% for hydrogen-based synthetic fuels relative to a fossil fuel comparator of 94gCO_{2e}/MJ in analogy to the approach set out in Article 25(2) of and Annex V to Directive (EU) 2018/2001 will be eligible for EuGB financing.</p> <p>Fortum has a small-scale pilot plant for hydrogen production (the Kalla plant) in Loviisa, Finland, which aims to test hydrogen production and provide a reference for future power-to-X projects. It plans to carry out a life-cycle GHG emissions assessment for this pilot plant in 2026.</p> <p>Hydrogen at Kalla is produced through electrolysis using fossil-free electricity. No CO₂ is generated as part of the electrolysis reaction itself. Electricity used in this facility is from Fortum's hydro fleet in Finland.</p> <p>The Kalla plant has passed the Finnish guarantee of origin audit under Energiavirasto's (the Finnish energy authority) requirements and produces renewable hydrogen from R&D test runs.</p>	
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	<p>Yes.</p> <p>We consider the issuer's assets and expenditures under this UoP to be aligned with the DNSH criteria for EO2.</p> <p>Fortum has confirmed that management of climate-related risks is integrated into the group's risk management framework, and that it follows the same governance and processes as other material risks and uncertainties.</p> <p>The annual risk management process identifies physical climate risks for Fortum assets. It produces and reports annually on vulnerability assessments and adaptation plans, to reduce the identified risks.</p> <p>Fortum's taxonomy-relevant entities take into account physical climate risks, which are reviewed by experts based on the risk matrix listed in the EU taxonomy for the most vulnerable plants.</p> <p>It also requires these entities to understand their assets' resilience towards different acute and chronic physical climate-related risks within different Intergovernmental Panel on Climate Change (IPCC) climate scenarios and create adaptation plans for the most material risks.</p> <p>It analyses vulnerability assessments based on four IPCC scenarios (representative concentration pathways 2.6, 4.5, 6.0 and 8.5), and develops adaptation plans accordingly.</p> <p>Fortum describes and reports these material climate-related risks in section 2.2 of its sustainability statement.</p>
	EO3	<p>Yes.</p> <p>We consider the issuer's assets and expenditures under this UoP to be aligned with the DNSH criteria for EO3.</p> <p>Fortum's water management process complies with the Water Framework Directive (WFD) and its requirements, as set out in local regulations in the EU.</p> <p>The responsibility for conducting environmental degradation risk assessments to preserve water quality and avoid water stress, in accordance with the WFD, lies with national authorities.</p>



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)

	Fortum states that all its operating sites fulfil the requirements of their respective licences to operate, and are committed to local water district management plans with mandatory and voluntary measures. This applies for both freshwater and marine water.
EO4	n.a.
EO5	<p>Yes</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO5.</p> <p>Fortum has disclosed that its chemical management process ensures compliance with regulations and management of risks.</p> <p>Fortum ensures its operations do not cause any significant harm from the substances used through compliance with local regulations, adherence to existing permits and a chemical management process, and by applying process safety practices.</p> <p>Fortum ensures compliance with the EU taxonomy by annually reviewing its use of persistent organic pollutants, restricted hazardous substances, mercury, ozone layer-depleting substances and chemicals under the Registration, Evaluation, Authorisation and Restriction of Chemicals (EC) No 1907/2006 (REACH) directive, to ensure legal and regulatory requirements in the energy sector are met.</p> <p>Fortum confirms it meets the DNSH criteria’s requirement for data or permit-based limits for full alignment with the best available techniques’ associated emissions levels, alongside assessment of the life-cycle GHG emissions savings.</p>
EO6	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO6.</p> <p>Fortum states that its biodiversity management is an integral part of the environmental management system that covers all its operations.</p> <p>Biodiversity management, defined in Fortum’s biodiversity manual, ensures compliance with biodiversity-related requirements set by local regulations, and that it takes necessary steps whenever feasible to avoid, mitigate or address potential impacts.</p> <p>Fortum’s biodiversity management process ensures compliance with biodiversity-related requirements set by local regulations, through the following process:</p> <ul style="list-style-type: none"> • local authorities decide whether a licence to operate requires an environmental impact assessment (EIA) or other actions related to biodiversity; • Fortum complies with regulations and has a licence to operate in all its operating sites; • it actively analyses impacts and risks, and plans and implements mitigation measures whenever feasible; • it implements required measures from the EIA, to mitigate the identified risks; and • if an EIA is not required, it applies biodiversity measures under licence conditions and other regulations, which also includes regulations on invasive alien species. <p>For biodiversity-sensitive areas:</p> <ul style="list-style-type: none"> • Fortum states that all sites are screened to ascertain if they are located in biodiversity-sensitive areas; operating sites in or near biodiversity-sensitive areas (under Natura 2000) are reported in section 2.4 of Fortum’s sustainability statement; and • if a site is located in or near a biodiversity area, it develops appropriate mitigation measures to ensure that the activity will not have significant negative effects on the conservation objectives of the protected area, in form of a management plan. <p>Fortum has committed to assessing and reducing its negative impact on the natural environment, according to the mitigation hierarchy, to achieve its biodiversity targets.</p> <p>Fortum has also committed to following the steps of the ecological mitigation hierarchy when defining mitigation actions or offsets. It will evaluate all mitigation and potential compensation measures (mandatory or voluntary) using science-based methods.</p>
Minimum Safeguard (MS)	<p>Yes.</p> <p>We consider the issuer to be aligned with the minimum safeguards.</p>



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)

		Fortum has committed to adhere to the UN Guiding Principles for Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the principles of the UN Global Compact, which include a commitment to respect the rights expressed in the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. Fortum has implemented these principles in its policies, guidelines and procedures.
Full Alignment		
Use of Proceeds		UoP 2: Solar power
Contribution to EU Environmental Objectives (EOs)		EO1
Applicable Economic Activity		4.1 “electricity generation using solar photovoltaic technology”
Substantial Contribution Criteria (SCC)		Yes. We consider the issuer’s assets and expenditures under this UoP to be aligned with the SCC for EO1. Fortum is developing or constructing facilities that generate electricity using solar PV technology in its operating countries, which include Finland, Sweden, Norway and Poland. Solar PV projects substantially contribute to climate change mitigation without needing to meet additional thresholds.
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	Yes. We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO2. We confirm Fortum meets the relevant DNSH requirements for EO2, for the reasons laid out in the “manufacture of hydrogen” UoP category.
	EO3	n.a.
	EO4	Yes. We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO4. Fortum has committed to assessing the availability of and, where feasible, using equipment and components of high durability and recyclability, and that are easy to dismantle and refurbish. Fortum, as a purchaser, has minimum selection criteria for suppliers and equipment, including relating to the durability of components. It also factors in estimates of dismantling costs during the overall evaluation and equipment selection process. Fortum considers the costs and benefits of durability in equipment selection. It also requires equipment manufacturers to provide evidence of durability before Fortum’s equipment selection process.
	EO5	n.a.
	EO6	Yes. We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO6. We confirm Fortum meets the relevant DNSH requirements for EO6, for the reasons laid out in the “manufacture of hydrogen” UoP category.
Minimum Safeguard (MS)		Yes. We consider the issuer to be aligned with the minimum safeguards. We confirm Fortum meets the minimum safeguard requirements, for the reasons laid out in the “manufacture of hydrogen” UoP category.
Full Alignment		



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	UoP 3: Wind power	
Contribution to EU Environmental Objectives (EOs)		EO1
Applicable Economic Activity	4.3 “electricity generation from wind power”	
Substantial Contribution Criteria (SCC)	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the SCC for EO1.</p> <p>Fortum is developing or constructing facilities that generate electricity using wind power technology in its operating countries, which include Finland, Sweden, Norway and Poland.</p> <p>The Pjelax wind farm in Finland has been operational since May 2024. Fortum is responsible for operations management and owns a 60% share of this wind farm.</p> <p>No offshore wind is included.</p> <p>Wind power projects substantially contribute to climate change mitigation without needing to meet additional thresholds.</p>	
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO2.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO2, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
	EO3	<p>n.a.</p> <p>Fortum is not financing offshore wind with EuGBs under its factsheet, so the DNSH requirements for offshore wind do not apply.</p>
	EO4	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO4.</p> <p>Fortum has committed to assessing the availability of and, where feasible, using equipment and components of high durability and recyclability, and that are easy to dismantle and refurbish.</p> <p>Fortum, as a purchaser, has minimum selection criteria for suppliers and equipment, including relating to the durability of components (equal to the lifetime of wind turbines). It also factors in estimates of dismantling costs during the overall evaluation and equipment selection process.</p> <p>Fortum considers the costs and benefits of durability in equipment selection. It also requires equipment manufacturers to provide evidence of durability before Fortum’s equipment selection process.</p>
	EO5	n.a.
	EO6	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO6.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO6, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
Minimum Safeguard (MS)	<p>Yes.</p> <p>We confirm Fortum meets the minimum safeguard requirements, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>	
Full Alignment		



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	UoP 4: Hydropower	
Contribution to EU Environmental Objectives (EOs)	EO1	
Applicable Economic Activity	4.5 “electricity generation from hydropower”	
Substantial Contribution Criteria (SCC)	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the SCC for EO1.</p> <p>Projects eligible for financing include only hydropower plants where the plant is either a run-of-river plant without an artificial reservoir, or where the power density of the electricity generation facility is above 5W/sqm.</p> <p>Fortum notes that if neither the first or second criteria are met, assets and expenditures that are eligible for financing will comply with the third requirement of the SCC, of life-cycle GHG emissions from generation of electricity being lower than 100gCO₂e/kWh.</p> <p>This will be based on life-cycle analyses, using environmental product declarations that are a standardised, third-party-verified document. These analyses will be conducted in accordance with ISO 14025:2006, based on ISO 14040/44:2006, and are therefore broadly consistent with the life-cycle assessment principles in Recommendation 2013/179/EU.</p>	
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO2.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO2, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
	EO3	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO3.</p> <p>The transposition of the WFD in different markets includes national competent authorities setting environmental requirements on operators. This can be done in river basin management plans, regulations or as part of permit conditions.</p> <p>Fortum’s hydropower fleet in Finland and Sweden complies with the WFD as transposed nationally. The implementation of measures follows the plan and timeline of national authorities, ensuring the balance of interests of all stakeholders and effectiveness of the measures.</p> <ul style="list-style-type: none"> • In Finland, all hydropower plants are in water bodies that have already achieved good water status, or where the relevant measures for hydropower as listed in the programme of measures are either being implemented or are in the implementation process. • In Sweden, Fortum has committed to following the national plan for hydropower, meaning the plants will meet modern environmental conditions. It will manage the requirements from authorities based on the WFD according to a time schedule decided by the Swedish government. <p>Fortum has implemented effective fish migration measures such as minimum flow rates and construction of fish passages, as well as implementing habitat improvements. Fortum has a large, ongoing programme for obsolete dams, which includes both its dismantling of a number of obsolete dams as well as further habitat improvement measures. Fortum is continuously developing ecologically relevant and technically feasible measures for effective fish migration and large-scale habitat improvements.</p>
	EO4	n.a.
	EO5	n.a.
	EO6	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO6.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO6, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
Minimum Safeguard (MS)	<p>Yes.</p> <p>We consider the issuer to be aligned with the minimum safeguards.</p>	



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)

	We confirm Fortum meets the minimum safeguard requirements, for the reasons laid out in the “manufacture of hydrogen” UoP category.	
Full Alignment		
Use of Proceeds	UoP 5: Storage of electricity	
Contribution to EU Environmental Objectives (EOs)		EO1
Applicable Economic Activity	4.10 “storage of electricity”	
Substantial Contribution Criteria (SCC)	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the SCC for EO1.</p> <p>Only pumped storage hydropower and battery energy storage systems (BESS) are eligible for financing under this category. Fortum is currently conducting feasibility studies on pumped storage hydropower in Sweden. Chemical storage is not currently able to be financed under this category.</p> <p>Pumped storage hydropower and BESS projects substantially contribute to climate change mitigation without needing to meet additional thresholds.</p>	
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO2.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO2, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
	EO3	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO3.</p> <p>For pumped hydropower storage not connected to a river body, we confirm Fortum meets the relevant DNSH requirements for EO3, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p> <p>For pumped hydropower storage connected to a river body, we confirm Fortum meets the relevant DNSH requirements for EO3, for the reasons laid out in the “hydropower” UoP category.</p>
	EO4	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO4.</p> <p>Fortum has confirmed that it applies waste hierarchy principles in all of its operations, including prevention, preparing for reuse, recycling, energy recovery and responsible disposal. Fortum considers the life-cycle and resource efficiency of its products and projects. It includes the durability and recyclability of equipment and components in procurement processes.</p> <p>Fortum aims for its own byproducts and waste to be used and recovered, and to minimise waste from its operations. It also expects its operating sites to efficiently manage end-of-life equipment and components. It works in close cooperation with local waste management partners to improve the management of conventional waste.</p> <p>The EU Battery Regulation indicates the responsibility for end-of-life management of batteries is primarily the responsibility of the economic operator that placed the battery on the EU market. Fortum procures batteries from suppliers that act as market participants under this regulation, so these suppliers are responsible for ensuring the collection, treatment, recycling and recovery of batteries at their end of life, in compliance with applicable EU requirements.</p> <p>Fortum states that it ensures that it fulfils relevant regulatory obligations during its procurement processes and within its supplier requirements, including adherence to applicable EU legislation and circular economy principles.</p>



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)


	It requires new projects to develop a waste management plan, as part of the EU taxonomy assessment	
EO5	n.a.	
EO6	Yes.	
	We consider the issuer's assets and expenditures under this UoP to be aligned with the DNSH criteria for EO6.	
	We confirm Fortum meets the relevant DNSH requirements for EO6, for the reasons laid out in the "manufacture of hydrogen" UoP category.	
Minimum Safeguard (MS)	Yes.	
	We consider the issuer to be aligned with the minimum safeguards.	
	We confirm Fortum meets the minimum safeguard requirements, for the reasons laid out in the "manufacture of hydrogen" UoP category.	
Full Alignment		

Use of Proceeds	UoP 6: Storage of thermal energy	
Contribution to EU Environmental Objectives (EOs)	EO1	
Applicable Economic Activity	4.11 "storage of thermal energy"	
Substantial Contribution Criteria (SCC)	Yes.	
	We consider the issuer's assets and expenditures under this UoP to be aligned with the SCC for EO1.	
	Fortum has thermal energy storage plants and projects in Finland and Poland.	
	Projects financed under this category will not include underground thermal energy storage or aquifer thermal energy storage.	
	Thermal energy storage plants and projects substantially contribute to climate change mitigation without having to meet additional thresholds.	
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	Yes.
	We consider the issuer's assets and expenditures under this UoP to be aligned with the DNSH criteria for EO2.	
	We confirm Fortum meets the relevant DNSH requirements for EO2, for the reasons laid out in the "manufacture of hydrogen" UoP category.	
	EO3	n.a.
	Fortum is not financing aquifer thermal energy storage with EuGBs under this factsheet, so the DNSH requirements for this storage type do not apply.	
	EO4	Yes.
	We consider the issuer's assets and expenditures under this UoP to be aligned with the DNSH criteria for EO4.	
	Fortum requires suppliers to demonstrate the durability and recyclability of components, and ensures compliance with applicable EU product and waste legislation, thereby supporting reuse, recycling and resource efficiency across its value chain.	
	Fortum has a detailed waste management plan for its Nuijala heating plant. It intends to recycle almost all materials at the end of the heating plant's life cycle. Small amounts of waste can be used for energy recovery. New projects that may be financed under this category will apply the same waste management plan.	
	EO5	n.a.
	EO6	Yes.



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)

	<p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO6.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO6, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
Minimum Safeguard (MS)	<p>Yes.</p> <p>We consider the issuer to be aligned with the minimum safeguards.</p> <p>We confirm Fortum meets the minimum safeguard requirements, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
Full Alignment	

Use of Proceeds	UoP 7: District heating distribution	
Contribution to EU Environmental Objectives (EOs)		EO1
Applicable Economic Activity	4.15 “district heating/cooling distribution”	
Substantial Contribution Criteria (SCC)	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the SCC for EO1.</p> <p>Fortum expects to allocate proceeds solely to its district heating network and pipelines in the cities of the Espoo-Kirkkonummi-Kauniainen network in Finland. Fortum evaluates the SCC based on whether the system meets the definition of an efficient district heating and cooling system, as laid down in Article 2, point 41, of Directive 2012/27/EU. Fortum’s district heating network in Espoo-Kirkkonummi-Kauniainen meets a combination of the following criteria:</p> <ul style="list-style-type: none"> • using at least 50% renewable energy; • using at least 50% waste heat; and • using at least 75% cogenerated heat. <p>This is in line with the SCC for the activity.</p>	
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO2.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO2, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
	EO3	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO3.</p> <p>Fortum has confirmed that its pipelines for district heating assets have started operations, and that the assets received permits before 2011. The need for an EIA is evaluated by local authorities when granting new permits. An EIA is not currently required for Fortum’s district heating operations, as the siting permit and excavation permit include water and biodiversity assessments.</p> <p>Finnish local authorities are responsible for assessments of environmental degradation risks related to preserving water quality and avoiding water stress.</p> <p>Fortum’s networks follow local regulations, cooperate closely with external stakeholders, and have implemented the monitoring and mitigation measures that were requested by the relevant authorities.</p> <p>Fortum has also implemented an internal environmental risk assessment process for its district heating and cooling operations in Finland, to assess water-related risks.</p>



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)

	<p>Fortum assesses water stress annually at the group level.</p> <p>The Espoo-Kirkkonummi-Kauniainen district heating network is not in a water-stressed area.</p> <p>The network operates as a closed system, where system water is primarily treated tap water and is not discharged under normal operations. Potential leakages are continuously monitored and managed through maintenance and control processes, to prevent releases to the environment. There are no routine discharges to surface or marine waters, so the activity does not contribute to deterioration of water bodies.</p>
EO4	n.a.
EO5	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO5.</p> <p>Fortum has confirmed that the fans, compressors, pumps and other equipment used in its operations that are covered by Directive 2009/125/EC comply, where relevant, with the top-class requirements of the energy label, and otherwise comply with implementing regulations under that directive and represent the best available technology.</p>
EO6	<p>Yes.</p> <p>We consider projects under this UoP to be aligned with the DNSH criteria for EO6.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO6, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
Minimum Safeguard (MS)	<p>Yes.</p> <p>We consider the issuer to be aligned with the minimum safeguards.</p> <p>We confirm Fortum meets the minimum safeguard requirements, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
Full Alignment	

Use of Proceeds	UoP 8: Installation and operation of electric heat pumps	
Contribution to EU Environmental Objectives (EOs)	EO1	
Applicable Economic Activity	4.16 “installation and operation of electric heat pumps”	
Substantial Contribution Criteria (SCC)	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the SCC for EO1.</p> <p>Fortum has confirmed that all new projects under this activity will comply with the refrigerant threshold (of a global warming potential that does not exceed 675) and energy-efficiency criteria under Directive 2009/125/EC.</p>	
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO2.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO2, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
	EO3	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO3.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO3, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
	EO4	Yes.



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)

		<p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO4.</p> <p>Fortum, as a purchaser, has minimum requirements for the durability of components, which is one of its selection criteria for suppliers and equipment. It also includes estimates of the dismantling costs as a factor affecting the overall evaluation and equipment selection process.</p> <p>Fortum takes into account the costs and benefits of durability (over the lifetime of the product) in equipment selection. It requires equipment manufacturers to provide evidence of durability before equipment selection.</p> <p>Fortum also requires new projects to have a waste management plan to ensure maximal reuse, remanufacturing or recycling at end of life, as part of the EU taxonomy assessment.</p>
EO5	Yes.	<p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO5.</p> <p>Fortum confirms that the air-to-air heat pumps with a rated capacity of 12kW or below in use in its operations will comply with the thresholds for sound power levels set out in Commission Regulation (EU) No 206/2012.</p>
EO6	n.a.	
Minimum Safeguard (MS)	Yes.	<p>We consider the issuer to be aligned with the minimum safeguards.</p> <p>We confirm Fortum meets the minimum safeguard requirements, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
Full Alignment		
Use of Proceeds	UoP 9: Production of heat and cool from waste heat	
Contribution to EU Environmental Objectives (EOs)		EO1
Applicable Economic Activity	4.25 “production of heat/cool using waste heat”	
Substantial Contribution Criteria (SCC)	Yes.	<p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the SCC for EO1.</p> <p>Waste heat and cool projects substantially contribute to climate change mitigation without having to meet additional thresholds.</p> <p>Fortum’s waste heat plants are connected to two large data centres to extract excess heat for district heating and to provide cooling for data centres.</p>
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	Yes.
		<p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO2.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO2, for the reasons laid out in the “manufacture of hydrogen” UoP category.</p>
	EO3	n.a.
	EO4	Yes.
		<p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO4.</p> <p>Fortum, as a purchaser, has minimum requirements for the durability of components, which is one of its selection criteria for suppliers and equipment. It also includes estimates of the dismantling costs as a factor affecting the overall evaluation and equipment selection process.</p>



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)

		It takes into account the costs and benefits of durability (over the lifetime of the product) in equipment selection. It requires equipment manufacturers to provide evidence of durability before equipment selection.
		It also requires new projects to have a waste management plan, as part of the EU taxonomy assessment.
	EO5	Yes. We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO5. The pumps and other equipment used by Fortum that are covered by Directive 2009/125/EC comply, where relevant, with the top-class requirements of the energy label, and otherwise comply with implementing regulations under that directive and represent the best available technology.
	EO6	Only projects that already comply with this directive can receive proceeds under this economic activity. Yes. We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO6. We confirm Fortum meets the relevant DNSH requirements for EO6, for the reasons laid out in the “manufacture of hydrogen” UoP category.
Minimum Safeguard (MS)		Yes. We consider the issuer to be aligned with the minimum safeguards. We confirm Fortum meets the minimum safeguard requirements, for the reasons laid out in the “manufacture of hydrogen” UoP category.
Full Alignment		
Use of Proceeds		UoP 10: Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle
Contribution to EU Environmental Objectives (EOs)		EO1
Applicable Economic Activity		4.26 “pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle”
Substantial Contribution Criteria (SCC)		Yes. We consider the issuer’s assets and expenditures under this UoP to be aligned with the SCC for EO1. Fortum does not currently have projects under this economic activity. If such projects are developed, Fortum will allocate funds only to projects that meet all relevant SCC. The commentary in the “electricity generation from nuclear energy in existing installations” UoP section includes a detailed overview of Fortum’s current measures to ensure full compliance with the relevant criteria.
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	Yes. Fortum does not currently have projects under this economic activity. If such projects are developed, Fortum will allocate funds only to projects that meet all relevant DNSH criteria for EO2. The commentary in the “electricity generation from nuclear energy in existing installations” UoP section includes a detailed overview of Fortum’s current measures to ensure full compliance with the relevant criteria.
	EO3	Yes. Fortum does not currently have projects under this economic activity. If such projects are developed, Fortum will allocate funds only to projects that meet all relevant DNSH criteria for EO3. The commentary in the “electricity generation from nuclear energy in existing installations” UoP section includes a detailed overview of Fortum’s current measures to ensure full compliance with the relevant criteria.
	EO4	Yes.



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)

	Fortum does not currently have projects under this economic activity. If such projects are developed, Fortum will allocate funds only to projects that meet all relevant DNSH criteria for EO4. The commentary in the “electricity generation from nuclear energy in existing installations” UoP section includes a detailed overview of Fortum’s current measures to ensure full compliance with the relevant criteria.
EO5	Yes.
	Fortum does not currently have projects under this economic activity. If such projects are developed, Fortum will allocate funds only to projects that meet all relevant DNSH criteria for EO5. The commentary in the “electricity generation from nuclear energy in existing installations” UoP section includes a detailed overview of Fortum’s current measures to ensure full compliance with the relevant criteria.
EO6	Yes.
	Fortum does not currently have projects under this economic activity. If such projects are developed, Fortum will allocate funds only to projects that meet all relevant DNSH criteria for EO6. The commentary in the “electricity generation from nuclear energy in existing installations” UoP section includes a detailed overview of Fortum’s current measures to ensure full compliance with the relevant criteria.
Minimum Safeguard (MS)	Yes.
	We consider the issuer to be aligned with the minimum safeguards.
	We confirm Fortum meets the minimum safeguard requirements, for the reasons laid out in the “manufacture of hydrogen” UoP category.




Full Alignment

Use of Proceeds	UoP 11: Construction and safe operation of new nuclear power plants		
Contribution to EU Environmental Objectives (EOs)	EO1		
Applicable Economic Activity	4.27 “construction and safe operation of new nuclear power plants, for the generation of electricity and/or heat, including for hydrogen production, using best-available technologies”		
Substantial Contribution Criteria (SCC)	Yes.		
	Fortum does not currently have fully owned activities under this economic activity. In the case of new projects, the same assessment of SCC conducted for “electricity generation from nuclear energy in existing installations” would apply and projects would meet all relevant SCC; the commentary in that section contains a detailed overview of Fortum’s current measures to ensure full compliance.		
Do No Significant Harm (DNSH)	EO1	n.a.	
	EO2	Yes.	
		Fortum does not currently have fully owned activities under this economic activity. In the case of new projects, the same assessment of alignment to the DNSH criteria for EO2 conducted for “electricity generation from nuclear energy in existing installations” would apply and projects would meet all relevant DNSH criteria; the commentary in that section contains a detailed overview of Fortum’s current measures to ensure full compliance.	
	EO3	Yes.	
		Fortum does not currently have fully owned activities under this economic activity. In the case of new projects, the same assessment of alignment to the DNSH criteria for EO3 conducted for “electricity generation from nuclear energy in existing installations” would apply and projects would meet all relevant DNSH criteria; the commentary in that section contains a detailed overview of Fortum’s current measures to ensure full compliance.	
EO4	Yes.		
	Fortum does not currently have fully owned activities under this economic activity. In the case of new projects, the same assessment of alignment to the DNSH criteria for EO4 conducted for “electricity generation from nuclear energy in existing installations” would apply and projects would meet all relevant DNSH criteria; the commentary in that section contains a detailed overview of Fortum’s current measures to ensure full compliance.		
EO5	Yes.		



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)

	Fortum does not currently have fully owned activities under this economic activity. In the case of new projects, the same assessment of alignment to the DNSH criteria for EO5 conducted for “electricity generation from nuclear energy in existing installations” would apply and projects would meet all relevant DNSH criteria; the commentary in that section contains a detailed overview of Fortum’s current measures to ensure full compliance.
EO6	Yes. Fortum does not currently have fully owned activities under this economic activity. In the case of new projects, the same assessment of alignment to the DNSH criteria for EO6 conducted for “electricity generation from nuclear energy in existing installations” would apply and projects would meet all relevant DNSH criteria; the commentary in that section contains a detailed overview of Fortum’s current measures to ensure full compliance.
Minimum Safeguard (MS)	Yes. We consider the issuer to be aligned with the minimum safeguards. We confirm Fortum meets the minimum safeguard requirements, for the reasons laid out in the “manufacture of hydrogen” UoP category.
Full Alignment	

Use of Proceeds	UoP 12: Nuclear energy (existing installations)
Contribution to EU Environmental Objectives (EOs)	EO1
Applicable Economic Activity	4.28 “electricity generation from nuclear energy in existing installations”
Substantial Contribution Criteria (SCC)	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the SCC for EO1. The SCC for category 4.28 contain a number of separate requirements; our analysis addresses each point individually as a result.</p> <p>SCC Point 1a Finland has a comprehensive legislative and regulatory framework (the Nuclear Energy Act and Radiation Protection Act) that governs nuclear safety and waste management.</p> <p>The licensing system under the Nuclear Energy Act is the core instrument ensuring nuclear safety; it aligns with the Nuclear Safety Directive (2009/71/Euratom).</p> <p>Finland has established national programmes and reporting mechanisms, as required by Directive 2011/70/Euratom (covering radioactive waste and spent fuel).</p> <p>Finland regularly submits “member state reports” as required by Article 14 of Directive 2011/70/Euratom; these explicitly describe its legislative and regulatory framework, and its implementation.</p> <p>The existence of a national programme for radioactive waste management, as required by Directive 2011/70/Euratom, confirms that this directive has been transposed and operationalised.</p> <p>SCC Point 1b Finland complies with the Euratom Treaty and Euratom Directives 2009/71, 2011/70 and 2013/59 (basic safety standards – radiation protection); as well as with EU environmental law, including Directives 2011/92/EU and 2000/60/EC.</p> <p>Finland is an EU member state and fully bound by the Euratom Treaty, which requires high standards of nuclear safety; protection of workers and the public from ionising radiation; and oversight and reporting to the European Commission.</p> <p>Finland has implemented the Euratom framework through national legislation and has an independent regulator, the Säteilyturvakeskus (STUK; the Radiation and Nuclear Safety Authority).</p> <p>Directive 2009/71/Euratom establishes a framework for nuclear safety and continuous improvement. Finland has an independent regulator (STUK); applies strict licensing, safety assessments and peer reviews; and participates in EU peer-review mechanisms (the European Nuclear Safety Regulators Group).</p>



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)

Directive 2011/70/Euratom requires national policies and safe long-term management. Finland has a fully developed national framework and strategy for radioactive waste and regularly reports to the European Commission (eg in a 2024 national report) showing that it has operational disposal solutions, as well as a deep geological repository at Olkiluoto with an operational readiness target of end-2026; and is making continuous improvements to legislation and systems.

Directive 2013/59/Euratom sets binding standards on exposure limits, monitoring and health protection.

Finland has transposed these into national radiation protection laws enforced by STUK, with strong compliance mechanisms.

Finland has implemented Directive 2011/92/EU (covering EIAs) through the EIA Act (2017), which requires environmental assessments for major projects and ensures public participation and transparency.

Finland has implemented the WFD through the Environmental Protection Act, Water Act and River Basin Management legislation.

SCC Point 1c

Finland has a fully funded State Nuclear Waste Management Fund, established under the Nuclear Energy Act. This fund collects mandatory payments from operators (including Fortum), and covers all future nuclear waste management and decommissioning costs.

SCC Point 1d

Finland operates the State Nuclear Waste Management Fund that is separate from the state budget and legally restricted to nuclear liabilities. The fund is designed to cover radioactive waste management and full decommissioning costs of all plants, including the Loviisa nuclear power plant.

Finland demonstrates financial preparedness that is consistent with Recommendation 2006/851/Euratom. The nuclear waste management fund is designed so that collected assets match all estimated future costs of waste management and decommissioning. The fund held around EUR3.1 billion at end-2024, which covers the remaining nuclear waste management liabilities.

SCC Point 1e

Finland has operational final disposal facilities for low- and intermediate-level radioactive waste (including very low-level waste in practice); these are incorporated into its national programme and regulatory framework.

It has operational repositories (Loviisa and Olkiluoto), which are licensed and regulated, and in continuous use. These are included in Finland's national programme under Directive 2011/70/Euratom and fall within the Euratom notification and regulatory framework (Article 41 of Regulation 2587/1999).

In March 2023, the Finnish government granted Fortum a licence to operate a final disposal facility for low- and intermediate-level radioactive waste, in the Loviisa power plant area, until end-2090.

SCC Point 1f

Finland has a documented plan with detailed steps to achieve operation of a high-level radioactive waste disposal facility well before 2050; this plan is contained within (and fully consistent with) its national programme under Directive 2011/70/Euratom.

High-level radioactive waste from spent nuclear fuel is stored in interim storage at the Loviisa nuclear power plant site, and final storage is in ONKALO, a deep geological repository located in Olkiluoto, Eurajoki, Finland. The repository was developed by Posiva to permanently dispose of spent nuclear fuel in engineered tunnels that are around 400m to 430m underground, using a multi-barrier isolation system.

SCC Point 2

The Loviisa nuclear power plant uses commercially available fuel that is licensed, certified and approved by the national safety regulator. This fuel incorporates incremental safety enhancements within conventional fuel design.

The European Commission does not provide a clear or formal definition of accident-tolerant fuel, although the complementary delegated act indicates accident-tolerant fuel refers to a commercially available fuel that provides additional protection against accidents. This can apply to the fuel itself, the fuel rods and the fuel assemblies.

There is currently no commercially available accident-tolerant fuel technology that can be used in the Loviisa nuclear



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)

power plant. Nevertheless, Fortum has committed to making use of accident-tolerant fuel when it becomes commercially available, and will continue to make use of the best-available technology existing as of today, which has some accident tolerance. However, it cannot anticipate when accident-tolerant fuels will become commercially available. Fortum continues conversations with vendors, and to monitor both the technical progress and the licensing of accident-tolerant fuel by the EU.

On this basis, we consider the fuel in use at Loviisa nuclear power plant to meet the SCC.

All safety-related systems, structures and modifications at the Loviisa nuclear power plant are subject to approval and continuous regulatory oversight by STUK, and compliance with regulatory requirements is a prerequisite for operation. STUK performs extensive safety assessments, inspections and approvals throughout the plant's life cycle, including during design, modifications and operation, with periodic reviews. This includes stress tests, including of the resilience of the plant to extreme natural hazards such as earthquakes.

STUK's requirements effectively ensure technologies meet high, continuously evolving safety standards. Fortum complies with the national requirements, including the regulatory guides on nuclear safety and security. The guidelines provided by STUK are in line with the International Atomic Energy Agency and Western European Nuclear Regulators Association standards. STUK is also an active member of the Western European Nuclear Regulators Association.

SCC Point 3

The European Commission has already been notified of Fortum's already implemented projects, in line with Regulation 2587/1999/Euratom, as this is a precondition for obtaining a construction licence in Finland. The European Commission has given its opinion, and Fortum has satisfactorily addressed all of the issues raised. The Finnish Ministry of Economic Affairs and Employment reports to the European Commission every five years.

SCC Point 4

Finland complies with the reporting obligations under Directive 2011/70/Euratom and submits regular national programme updates to the European Commission. These reports include assessments of the adequacy of the State Nuclear Waste Management Fund, as well as information on the progress of implementing the national programme for spent fuel and radioactive waste management, including the Onkalo final disposal project.

SCC Point 5

The Loviisa nuclear power plant operates under Finnish legislation implementing Directive 2009/71/Euratom and related EU requirements. Fortum has submitted comprehensive safety demonstrations as part of the licensing process, ensuring that the scope and level of detail are commensurate with the potential magnitude and nature of hazards relevant to the installation and its site. It has performed site- and installation-specific safety assessments in connection with the licensing procedures, and has maintained these assessments throughout the operational lifetime of the plant.

Fortum applies defence-in-depth principles, including measures designed to minimise the impact of external events and extreme natural hazards, such as earthquakes, in line with applicable regulatory requirements. It continuously maintains and enhances these measures, as part of the plant's safety management and improvement processes.

The continuous regulatory oversight by STUK ensures compliance with these requirements; STUK conducts extensive safety assessments, inspections and approvals throughout the plant's life cycle. This includes oversight of design, modifications and operation, as well as periodic safety reviews, to ensure that nuclear safety requirements are met and continuously improved over time.

SCC Point 6

Fortum's nuclear facilities comply with applicable EU regulations and national regulations. The national regulations are based on international standards (including those of the International Atomic Energy Agency and the Western European Nuclear Regulators Association). The Finnish regulatory framework and continuous oversight by STUK ensure Fortum complies with these regulations.

Fortum comprehensively considers external natural hazards in safety analyses, and implements continuous improvements through modernisation programmes, operational experience and regulatory requirements.

SCC Point 7

Fortum complies with Finnish laws and regulations requiring it to manage and dispose of its own nuclear waste in the country in which the waste originates.



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)

		<p>Additional SCC</p> <p>Fortum has assessed the life-cycle GHG emissions associated with electricity generation through a comprehensive life-cycle assessment covering the full cradle-to-grave value chain of the Loviisa nuclear power plant.</p> <p>The assessment demonstrates that the life-cycle GHG emissions from electricity produced at Loviisa are around 6.08gCO₂e/kWh, calculated per unit of electricity delivered to the customer. This value is below the EU taxonomy's threshold of 100gCO₂e/kWh.</p> <p>The assessment was conducted by an external expert (Etteplan) and includes a critical review by an independent third party (AFRY), ensuring the robustness and credibility of the methodology and results; and the life-cycle GHG emissions were calculated in line with internationally recognised standards, including ISO 14067:2018, ISO 14040:2006 and ISO 14044:2006.</p>
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	<p>Yes.</p> <p>We consider the issuer's assets and expenditures under this UoP to be aligned with the DNSH criteria for EO2.</p> <p>Fortum regularly and systematically assesses climate- and weather-related risks at the Loviisa nuclear power plant, using a probabilistic risk assessment (PRA) and periodic safety reviews, including evaluation of external hazards at the site.</p> <p>Climate conditions can pose risks to safety and production; Fortum identified high sea-water levels as the most significant risk, potentially leading to flooding. It also included additional climate-related hazards, such as elevated air and sea water temperatures, strong winds, waterspouts, precipitation and lightning, within its risk assessments.</p> <p>Fortum's PRA assesses seismic risks, although Finland is not a seismically active area, so Fortum does not consider this to be a material risk.</p> <p>Extreme weather events and long-term climate change impacts are further analysed within the Finnish Research Programme on Nuclear Power Plant Safety and the National Nuclear Safety and Waste Management Research Programme (2023–2028).</p> <p>Fortum also assesses production-related impacts, as certain hazards may affect production before posing safety risks.</p> <p>The Finnish Meteorological Institute has assessed the recurrence levels of sea water height under current climate conditions. Fortum has assessed the impact of climate change on the temporal behaviour of the mean sea water level in the Loviisa sea area, based on data from the IPCC Special Report on the Ocean and Cryosphere in a Changing Climate, as well as land uplift data provided by the National Land Survey of Finland. Fortum has assessed the impact of climate change on the risk significance of high sea water level recurrence been assessed as manageable. Fortum monitors national and international research related to the topic.</p> <p>The Loviisa nuclear power plant has a comprehensive PRA that thoroughly evaluates external hazards in line with the requirements of STUK's "Provisions for internal and external hazards at a nuclear facility" guidelines. It has implemented, and continues to implement, safety improvements based on the PRA results and external operating experience. The most significant improvements have focused on sea water level and the availability of cooling water.</p> <p>The plant systems include extensive environmental monitoring (including weather and sea water measurements), and operational procedures define actions to be taken when specific threshold values are exceeded. These procedures cover conditions such as high sea water temperature, low sea water temperature, high sea water level, high ambient air temperature, low ambient air temperature, strong winds and storms, heavy snowfall, and heavy rainfall.</p> <p>Fortum has systematically developed preparedness for weather-related risks at the Loviisa nuclear power plant over the long term; and has currently identified no significant improvement needs for the next five years.</p> <p>The planning and commissioning of a nuclear power plant includes evaluation and consideration of physical risks; these risks are assessed continuously as part of the requirements set by STUK. The activity complies with the requirements laid down in Article 6(b); Article 8b (1), point (a); and Article 8c(a) of Directive 2009/71/Euratom. Finland has transposed this directive into national legislation, under Suomen Säädöskokoelma (269/2011) and Suomen Säädöskokoelma (990/1987). Fortum complies with the requirements specified in this legislation. The activity fulfils the requirements of Directive 2009/71/Euratom; Fortum has implemented them in accordance with the international guidance of the International Atomic Energy Agency and the Western European Nuclear Regulators Association relating to extreme natural hazards, including floods and extreme weather conditions.</p>



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)

EO3	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO3.</p> <p>The Loviisa nuclear power plant uses seawater from the Baltic Sea for cooling, with both water intake and discharge occurring in a marine environment, so not affecting inland freshwater bodies.</p> <p>The Finnish Regional State Administrative Agency regulates the plant’s thermal discharges through plant-specific environmental permit conditions.</p> <p>Fortum has assessed environmental impacts on water via an EIA conducted in accordance with Directive 2011/92/EU, including water-related impacts under Directive 2000/60/EC. It identifies and manages environmental degradation risks through this process, and through ongoing permitting and monitoring requirements.</p> <p>Loviisa is a coastal facility, so the specific temperature control criteria for inland nuclear power plants are not applicable; however, Fortum ensures it has equivalent control of thermal discharges through permit limits.</p> <p>The activity complies with the International Finance Corporation standards, and operations are carried out in line with national legislation implementing Directive 2000/60/EC and Directive 2013/51/Euratom, including compliance with applicable emission limits and monitoring obligations.</p>
EO4	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO4.</p> <p>The Loviisa nuclear power plant has comprehensive arrangements in place for the management of radioactive and non-radioactive waste, ensuring that waste is handled in line with the waste hierarchy and applicable regulatory requirements. Fortum minimises waste generation, and maximises reuse or recycling where feasible, in line with Directive 2011/70/Euratom and Directive 2013/59/Euratom.</p> <p>It also minimises the production of radioactive waste during operation and decommissioning, and maximises the share of free-release materials, supported by established operational procedures and regulatory oversight.</p> <p>Fortum has a financing mechanism to ensure adequate coverage of all future decommissioning and waste management costs, in compliance with Directive 2011/70/Euratom and Recommendation 2006/851/Euratom.</p> <p>The nuclear power plant has undergone an approved EIA, and implemented the required mitigation and compensatory measures.</p> <p>These elements are further supported by Finland’s reporting obligations to the European Commission under Directive 2011/70/Euratom.</p>
EO5	<p>Yes.</p> <p>We consider the issuer’s assets and expenditures under this UoP to be aligned with the DNSH criteria for EO5.</p> <p>Appendix C</p> <ul style="list-style-type: none"> • These DNSH criteria are mainly regulated through the plant’s environmental permit, which includes a number of conditions for water use and water quality. Fortum performs annual monitoring to ensure that the release of a low amount of process chemicals does not have a negative impact on the marine environment. It also regulates temperature increases, based on the permit conditions for the plant. • Mercury is not used in the plant’s processes; the plant does not have an inflow of mercury or require mercury consumption to run the operations. Fortum has obtained guidance on what “use” is referring to in (EU) 2017/852; this guidance indicates it means processes where mercury or mercury mixtures are an active input to the process. The plant’s operations do not lead to the manufacture of products containing mercury, nor does it lead to mercury products being placed on the market. The existence of mercury in old equipment does not trigger a demand for mercury. • Fortum and Loviisa nuclear power plant both have ongoing processes to evaluate chemicals used in their operations, with the aim of replacing hazardous chemicals and compounds with ones less hazardous. It has replaced, and is working to replace, several chemicals and compounds as a result of this. However, it cannot replace some chemicals or compounds without endangering the nuclear power plant’s operations; instead, it strictly controls the use of such substances and ensures compliance with applicable legislation. One example is boric acid, which is used in nuclear power production in pressurised water reactors as a soluble neutron absorber to control reactor reactivity, and which



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)

	<p>is not replaceable. Another example is hydrazine, which is used as corrosion inhibitor to prevent oxygen removal in secondary circulation.</p> <p>Additional Requirements The plant's non-radioactive emissions are within or lower than the emission levels associated with the BAT-AEL ranges set out in the best available techniques conclusions for large combustion plants. No significant cross media effects occur. In Finland, environmental permits set emission limits, and major spills are checked via internal reporting systems.</p> <p>The thermal input of the Loviisa nuclear power plant is well above the 1MW plant threshold and the large combustion plant threshold, as the plant has a capacity of 1,500MW.</p> <p>The plant's radioactive emissions and resulting radiation doses are well below regulatory limits, and are subject to continuous monitoring and reporting.</p> <p>Fortum safely and responsibly manages spent fuel and radioactive waste, in line with national and EU regulatory requirements. It has adequate interim storage capacity in place, and Finland has established national disposal solutions.</p>
EO6	<p>Yes.</p> <p>We consider the issuer's assets and expenditures under this UoP to be aligned with the DNSH criteria for EO6.</p> <p>We confirm Fortum meets the relevant DNSH requirements for EO6; in a large part for the reasons laid out in the "manufacture of hydrogen" UoP category.</p> <p>It also has all required permits in place, supported by approved EIAs conducted in accordance with national legislation, which is aligned with EU taxonomy EIA requirements. The EIA for the Loviisa nuclear power plant, completed in 2021, covers both the lifetime extension of the plant and its eventual decommissioning.</p> <p>The Loviisa nuclear power plant is not located in or near biodiversity-sensitive areas, and the EIA concluded that the plant's operations do not have adverse effects on the conservation status of nearby habitats or species.</p>
Minimum Safeguard (MS)	<p>Yes.</p> <p>We consider the issuer to be aligned with the minimum safeguards.</p> <p>We confirm Fortum meets the minimum safeguard requirements, for the reasons laid out in the "manufacture of hydrogen" UoP category.</p>
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.

We have also provided the following services or products to the same entity:

- We have not provided any other service or product.



SOLICITATION STATUS

The European Green Bond Assessment was solicited and assigned or maintained by Sustainable Fitch at the request of the entity.

A Sustainable Fitch Analytical Product provides an assessment of the Environmental, Social and/or Governance qualities of an issuer and/or its financial instruments or securities. Sustainable Fitch Analytical Products include without limitation ratings, scores, second-party opinions and other assessments, opinions and data-related products, among other Analytical Products. A Sustainable Fitch Analytical Product is not a credit rating. Analytical Products are provided by Sustainable Fitch, a Fitch Solutions company, and an affiliate of Fitch Ratings. Sustainable Fitch has established specific policies and procedures intended to avoid creating conflicts of interest and compromising the independence or integrity of Fitch Ratings' credit rating activities and Sustainable Fitch's Analytical Product generation activities. For a description of the methodology, limitations and disclaimers relating to Sustainable Fitch's Analytical Products, please use this link: www.sustainablefitch.com.

Please note that individuals identified in any Analytical Product report or press release are not responsible for the opinions stated therein and are named for contact purposes only. A report regarding an Analytical Product is neither a prospectus nor a substitute for the information assembled, verified and presented to investors by the issuer and its agents in connection with the sale of financial instruments and securities. Sustainable Fitch's Products are not considered investment advice and they are not and should not be considered as a replacement of any person's own assessment of the sustainability factors related to a financial instrument or an entity. Sustainable Fitch does not represent, warrant or guarantee that an Analytical Product will fulfil any of your or any other person's particular purposes or needs. Sustainable Fitch does not recommend the purchase or sale of financial instruments or securities or give investment advice or provide any legal, auditing, accounting, appraisal or actuarial services. Sustainable Fitch's Analytical Products are not an opinion as to the value of financial instruments or securities. Sustainable Fitch does not audit or verify the accuracy of the information provided to it by any third party for the purpose of issuing an Analytical Product, including without limitation issuers, their representatives, accountants and legal advisors and others. Sustainable Fitch does not represent, warrant or guarantee the accuracy, correctness, integrity, completeness or timeliness of any part of the Analytical Product. The information in an Analytical Product report is provided "as is" without any representation or warranty of any kind, and Sustainable Fitch does not represent or warrant that the report or any of its contents will meet any of the requirements of a recipient of the report. Sustainable Fitch does not provide a limited or reasonable assurance on any information presented in an Analytical Product report.

Sustainable Fitch receives fees from entities and other market participants who request Sustainable Fitch Analytical Products in relation to the analysis conducted to assign a rating, score, opinion or an assessment to a given financial instrument and/or entity, as well as the distribution of data. The assignment, publication, or dissemination of a Sustainable Fitch Analytical Product shall not constitute a consent by Sustainable Fitch to use its name as an expert in connection with any registration statement filed under the United States securities laws, the Financial Services and Markets Act of 2000 of the United Kingdom, or the securities laws of any particular jurisdiction.

Any ratings, second-party opinions, assessments, commentaries or other reports and products issued by Sustainable Fitch are not intended to be and shall not be relied upon or used by any users located in India in relation to securities listed or proposed to be listed on Indian stock exchanges.

Sustainable Fitch Analytical Products offered to clients in Australia. Analytical Products in Australia are available only to wholesale clients (as defined in section 761G and 761GA of the Corporations Act (Cth) (the "Act")) in Australia. Information related to Analytical Products published by Sustainable Fitch is not intended to be used by persons who are retail clients within the meaning of section 761G and 761GA of the Act ("Retail Clients") in Australia. No one shall distribute, disclose or make references to any information related to Analytical Products in a manner which is intended to (or could reasonably be regarded as being intended to) influence a Retail Client in making a decision in relation to a particular financial product (as defined in the Act) or class of financial products, unless required to do so by law to meet continuous disclosure obligations. No one shall make reference to any Sustainable Fitch Analytical Product information in any publication, promotional material, disclosure document, correspondence, website, or any other venue that may be accessed by clients and investors who are Retail Clients in Australia (except in the circumstances as permitted by law). Sustainable Fitch does not hold an Australian financial services license to provide general financial product advice and the Analytical Products are provided subject to the conditions of the [class no-action position to second party opinion providers issued by the Australian Securities & Investments Commission on 14 June 2024](#). Except as disclosed above or on our website, there is no conflict of interest that is material that may arise in providing the views and opinions here. For industry-accepted framework and standards relevant to this Analytical Product, please refer to information above and in the methodology.

Copyright © 2026 by Sustainable Fitch, Inc., Sustainable Fitch Limited and their subsidiaries. 300 West 57th Street, New York, NY 10019. Telephone: 1-800-753-4824, (212) 908-0500. Reproduction or retransmission in whole or in part is prohibited except by permission. All rights reserved.