



EU Taxonomy Reporting Assessment

Transmission and distribution of electricity

REFERENCE	CENS-2026-58951
DATE OF ASSESSMENT	21 August 2026
DATE OF ISSUE	21 August 2026
CRITERIA BASIS	Delegated Acts as amended, in force July 2026
UNIT OF ASSESSMENT	Constantine Energy's high-voltage electricity transmission network operations connecting renewable generation to the grid.
PREPARED BY	Censatim · censatim.com

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INFORMATION REVIEWED

- Business area description and dialogue responses provided by user. No financial figures calculated; alignment stated per criterion for client allocation.
- Matched EU Taxonomy activity: Transmission and distribution of electricity (CCM 4.9).
- Applicable generic DNSH appendices referenced.
- Criterion requirement texts and evidence basis are reproduced in Annex A; the full question and answer record in Annex B.

SUMMARY OF ASSESSMENT

EU Taxonomy alignment

Partial

Substantial Contribution is met; DNSH falls short

DIMENSION	ALIGNMENT	CONFIDENCE
Substantial Contribution - Climate Mitigation	ENABLING In-line	High
Do No Significant Harm	Not aligned	Moderate
Climate Adaptation	In-line	Moderate
Circular Economy	Not aligned	High
Pollution Prevention	Not aligned	High
Biodiversity	Not aligned	High
Water & Marine	N/A	
Minimum Social Safeguards assessed at entity level under CENS-2026-23243	In-line	Moderate

RATING SCALE ● Not aligned ● Partial ● In-line ● Undetermined

N/A is an applicability marker, not a rating: no applicable criterion exists for this activity under that objective. Confidence reflects the strength of the evidence provided for each finding: High = clearly evidenced; Moderate = reasonable with some gaps; Low = key evidence missing. Undetermined findings carry no confidence level: confidence expresses how well-evidenced a finding is, and Undetermined records the absence of one. DNSH is met only when every applicable objective is met. This is an enabling activity: it must directly enable substantial contribution in other activities without leading to carbon lock-in.

ACTIVITY IDENTIFICATION

ACTIVITY	Transmission and distribution of electricity
NACE CODE	D35.12, D35.13
ACTIVITY ID	CCM 4.9
ELIGIBILITY	Confirmed listed in the EU Taxonomy

ASSESSMENT OPINION

Headline

Substantial contribution is in-line on the interconnected European system route; climate adaptation is in-line with moderate confidence; but Do No Significant Harm is not aligned due to confirmed absences in waste management planning, environmental impact assessment, protected-area assessments, and pollution prevention controls.

Documentation reviewed

Censatim reviewed no documents for this assessment. Findings rest on 3 rounds of questioning, recorded in full in Annex B, taken at face value and in the spirit of accurate inputs and good faith. Documents requested during the assessment and not provided are listed under Information gaps.

Scope of this assessment

This assessment covers Constantine Energy's high-voltage electricity transmission network operations connecting renewable generation to the grid (CCM 4.9). The company also operates solar PV and onshore wind generation assets, which are separate eligible activities under CCM 4.1 and related generation criteria. Those generation activities are NOT covered here and require separate assessment.

Substantial Contribution – Climate Change Mitigation

ELECTRICITY SYSTEM QUALIFICATION

Constantine Energy's transmission infrastructure spans Spain, Italy, Greece, and Portugal, all within interconnected EU Member State control areas. This places it squarely within the interconnected European system as defined in the criteria, satisfying Route 1 of the substantial contribution test without requiring any emissions-factor calculation. Membership of this system is the decisive structural fact, and the network's own generation mix (solar and wind) reinforces that no disqualifying high-carbon direct connection exists. (based on A1)

DEDICATED DIRECT CONNECTION EXCLUSION CHECK

The network connects Constantine Energy's own solar and wind generation to the grid. No evidence was provided or suggested of any dedicated direct connection to generation above 100 gCO₂e/kWh; the generation mix described is entirely renewable. The Route 1 disqualification for high-carbon dedicated connections does not apply on this evidence. (based on A1, A2)

SMART METERING EXCLUSION CHECK

No metering installation activity was described or indicated as part of the assessed operations. The metering exclusion is not triggered here.

LIFECYCLE EMISSIONS ESTIMATE (SUPPORTING CONTEXT)

The internally estimated 15-20 gCO₂e/kWh for newly enabled generation connections sits comfortably below 100 gCO₂e/kWh and is contextually consistent with a solar and wind-dominated connection portfolio. This figure is an internal mix-based estimate rather than a formal per-connection lifecycle assessment (A10), but because the substantial contribution determination rests on interconnected European system membership rather than this figure, the absence of a formal lifecycle assessment does not affect the Route 1 rating. It is noted as a gap for completeness. (based on A2, A10)

Substantial contribution: IN-LINE. The interconnected European system membership route is satisfied by clear structural attestation across four EU Member State control areas. (based on A1)

Do No Significant Harm

CLIMATE CHANGE ADAPTATION

A CRVA covering flooding, extreme heat, storm and wind loading, and wildfire was completed for the transmission network, using a scenario range and a 2050 horizon consistent with the multi-scenario RCP requirement for long-lived infrastructure (A3). The hazard set is appropriate for the Iberian and Greek asset locations. Vegetation management in wildfire corridors is operational and embedded in the maintenance programme (A4). Flood-resilience upgrades are partially implemented, with priority sections complete and the remainder targeted for completion by end of 2028 (A4). The 2028 timeline sits within the five-year rolling implementation window permitted for existing assets. No suggestion of adverse external impacts or conflict with national adaptation plans was raised. (based on A3, A4)

Climate change adaptation: IN-LINE at moderate confidence pending documentary confirmation of the formal adaptation plan and the 2028 completion schedule.

WATER AND MARINE RESOURCES

N/A

TRANSITION TO A CIRCULAR ECONOMY

Asset-level procedures for transformer oil recovery, metal recycling, and tower dismantlement are described as consistent and documented practice (A6). However, Constantine Energy confirmed that these are not consolidated into a single group-wide policy referencing the waste hierarchy, and that no contractual documentation with waste management partners exists to evidence the arrangements (A9). The criteria require both a waste management plan and contractual or project-level evidence of the arrangements; neither has been produced. This is a confirmed absence of the required policy instrument and supporting contracts, not a matter of confidence in underlying practice. (based on A6, A9)

Transition to a circular economy: NOT ALIGNED.

POLLUTION PREVENTION AND CONTROL

Three requirements remain unconfirmed after direct questioning. First, overground line construction is stated to follow general industry good practice but formal adherence to IFC EHS Guidelines is not confirmed (A7). Second, design standards are intended to keep EMF exposure within recognised limits but documented compliance with Council Recommendation 1999/519/EC across all network sections is absent (A7). Third, newer transformers are PCB-free by specification but a portfolio-wide PCB testing record covering all in-service units does not exist (A7). All three shortfalls were confirmed by the user as unconfirmed rather than compliant. Each is an independent gap; taken together they represent a materially incomplete position against three cumulative requirements of the pollution criterion. (based on A7)

Pollution prevention and control: NOT ALIGNED.

PROTECTION AND RESTORATION OF BIODIVERSITY AND ECOSYSTEMS

Network sections run near the Natura 2000 site adjacent to the Attica corridor and near designated wetland and conservation areas in Spain and Portugal (A5). Route selection avoided direct incursion into protected boundaries but Constantine Energy confirmed that no completed EIA or formal Appropriate Assessment specific to these network sections exists (A8). Route avoidance does not satisfy the requirement for a completed statutory assessment and implemented mitigation recommendations. The absence of both the baseline EIA and the Appropriate Assessment for proximity to protected areas is confirmed. (based on A5, A8)

Protection and restoration of biodiversity and ecosystems: NOT ALIGNED.

DNSH OVERALL

NOT ALIGNED. Three objectives are not aligned: transition to a circular economy (confirmed absence of a consolidated waste management plan with contractual evidence), pollution prevention and control (confirmed absence of IFC EHS adherence, EMF compliance documentation, and portfolio-wide PCB clearance), and biodiversity (confirmed absence of a completed EIA and Appropriate Assessment for protected-area corridors). Any single one of these would drag the overall DNSH rating to NOT ALIGNED; all three are independently confirmed.

Minimum Social Safeguards (Article 18)

Minimum Social Safeguards were assessed at entity level under CENS-2026-23243 and carry over to this activity unchanged. Refer to that report for the pillar-by-pillar findings.

Information gaps

HIGH IMPACT

Completed EIA and Appropriate Assessment for protected-area corridors. Statutory environmental assessments and Appropriate Assessments for the Attica Natura 2000 corridor and the Spanish and Portuguese designated-area sections have not been completed; route avoidance alone does not substitute for these instruments. This information was requested during the assessment.

HIGH IMPACT

Consolidated waste management plan with contractual evidence. A single group-wide policy referencing the waste hierarchy and contractual documentation with waste management partners are both absent; their production is required to satisfy the circular economy criterion. This information was requested during the assessment.

HIGH IMPACT

Pollution prevention compliance documentation. Formal adherence to IFC EHS Guidelines for construction, documented EMF compliance with Council Recommendation 1999/519/EC across all network sections, and a portfolio-wide PCB testing record for in-service equipment are all unconfirmed. This information was requested during the assessment.

MATERIAL

Formal adaptation plan and 2028 flood-resilience completion record. A documented adaptation plan and evidence of the 2028 completion schedule for remaining flood-resilience upgrades would raise confidence in the adaptation finding from moderate to high.

This does not constitute a formal opinion and is not a substitute for full verification.



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METHODOLOGY

This assessment maps the entity's stated business areas to the economic activities defined under the EU Taxonomy (Regulation (EU) 2020/852) and its Delegated Acts. Each identified business area is assessed first for eligibility, then, where in scope, against the applicable Substantial Contribution and Do No Significant Harm criteria, with reference to the generic appendices where invoked. Alignment findings are expressed per business area and per environmental objective. Censatim does not calculate or report financial figures; the mapping is provided to enable the entity to allocate turnover, capital expenditure, and operating expenditure itself.

RATING SCALE

In-line

The criterion appears met on the evidence provided.

Partial

Overall conclusion only: the Substantial Contribution criteria are met, but DNSH and/or Minimum Social Safeguards fall short. Individual criteria and objectives are rated In-line, Not aligned, or Undetermined.

Not aligned

The criterion appears not to be met on the evidence provided, including where the dialogue establishes that a required assessment, document or process does not exist.

Undetermined

Insufficient evidence was provided to reach a view. A confirmed absence of a required element is rated Not aligned, not Undetermined.

N/A

No applicable criterion exists for this activity under the relevant objective. N/A expresses applicability, not a rating and not a confidence level.

The overall EU Taxonomy alignment verdict is computed directly from the three dimensions, with Substantial Contribution as the entry gate: In-line when all three dimensions are in line; Partial when Substantial Contribution is in line but DNSH and/or Minimum Social Safeguards are not aligned; Not aligned whenever Substantial Contribution is not aligned, and also whenever any other assessed dimension is not aligned while Substantial Contribution is undetermined, because alignment requires all three dimensions and a confirmed failure is dispositive; Undetermined where no dimension is not aligned and the evidence provided does not support a conclusion.

CONFIDENCE LEVELS

HIGH

The finding is clearly evidenced by specific documents or data provided.

MODERATE

The finding is reasonably supported but some evidence remains outstanding.

LOW

Key evidence is missing; the finding rests substantially on unverified statements.

Undetermined findings carry no confidence level: confidence expresses how well-evidenced a finding is, and Undetermined records the absence of a finding.

INFORMATION GAP PRIORITY

Gap priorities use a separate blue scale so they are never confused with the alignment ratings above.

High impact

Prevents a determination or alignment on a criterion until resolved.

Material

Materially affects a rating or the confidence attached to it.

Minor

A documentary improvement; does not change the current findings.

The Censatim team can advise on how identified gaps are typically closed and, where deeper remediation work is needed, can recommend specialist consultants suited to the particular gap. Contact consult@censatim.com quoting the report reference.

ASSUMPTIONS

- Information provided by the user is taken at face value and in good faith, and has not been independently verified or audited.
- Where required data was not provided, the relevant criterion is marked as undetermined rather than assumed to be met or unmet.
- The assessment reflects the EU Taxonomy Delegated Acts in force at the date of issue; subsequent amendments are not retrospectively applied.
- Qualitative criteria requiring specialist judgement may be flagged for expert review rather than concluded automatically.
- Each issued report is stored under its reference and can be retrieved as issued. Reports are AI-assisted: wording may vary if identical inputs were re-run; the criteria applied remain those stated under Criteria basis.

DISCLAIMER

This document is an AI-assisted analysis referenced against the EU Taxonomy Delegated Acts. It does not constitute professional regulatory advice, a formal audit opinion, legal advice, or a guarantee of regulatory compliance, and should not be the sole basis for regulatory disclosure, investor reporting, or financing decisions. All findings should be reviewed by a qualified EU Taxonomy practitioner before use; Censatim accepts no liability for decisions taken in reliance on this document. To discuss the findings or commission a practitioner-reviewed assessment, contact consult@censatim.com.

Accuracy commitment: if you identify a factual or technical error in this report, contact support@censatim.com quoting the reference above. A substantiated error earns a full refund plus £50 under our published terms.



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The requirement texts below are reproduced verbatim from Censatim's criteria database (Delegated Acts as amended, in force July 2026), alongside the finding reached, its confidence, and the evidence basis for each dimension. Documented means the key facts came from uploaded evidence; User-stated means they rest on statements provided in the dialogue and reproduced in Annex B.

SUBSTANTIAL CONTRIBUTION

In-line

● High

USER-STATED

REQUIREMENT (VERBATIM)

The activity complies with one of the following criteria: 1. The transmission and distribution infrastructure or equipment is in an electricity system that complies with at least one of the following criteria: the system is the interconnected European system, i.e. the interconnected control areas of Member States, Norway, Switzerland and the United Kingdom, and its subordinated systems; more than 67% of newly enabled generation capacity in the system is below the generation threshold value of 100 gCO₂e/kWh measured on a life cycle basis in accordance with electricity generation criteria, over a rolling five-year period; the average system grid emissions factor, calculated as the total annual emissions from power generation connected to the system, divided by the total annual net electricity production in that system, is below the threshold value of 100 gCO₂e/kWh measured on a life cycle basis in accordance with electricity generation criteria, over a rolling five-year period; Infrastructure dedicated to creating a direct connection or expanding an existing direct connection between a substation or network and a power production plant that is more greenhouse gas intensive than 100 gCO₂e/kWh measured on a life cycle basis is not compliant. Installation of metering infrastructure that does not meet the requirements of smart metering systems of Article 20 of Directive (EU) 2019/944 is not compliant.

2. The activity is one of the following: construction and operation of direct connection, or expansion of existing direct connection, of low carbon electricity generation below the threshold of 100 gCO₂e/kWh measured on a life cycle basis to a substation or network; construction and operation of electric vehicle (EV) charging stations and supporting electric infrastructure for the electrification of transport, subject to compliance with the technical screening criteria under the transport Section of this Annex; installation of transmission and distribution transformers that comply with the Tier 2 (1 July 2021) requirements set out in Annex I to Commission Regulation (EU) No 548/2014 and, for medium power transformers with highest voltage for equipment not exceeding 36 kV, with AA0 level requirements on no-load losses set out in standard EN 50588-1(195)CEI EN 50588-1 Medium power transformers 50 Hz, with highest voltage for equipment not exceeding 36 kV.. construction/installation and operation of equipment and infrastructure where the main objective is an increase of the generation or use of renewable electricity generation; installation of equipment to increase the controllability and observability of the electricity system and to enable the development and integration of renewable energy sources, including: sensors and measurement tools (including meteorological sensors for forecasting renewable production); communication and control (including advanced software and control rooms, automation of substations or feeders, and voltage control capabilities to adapt to more decentralised renewable infeed). installation of equipment such as, but not limited to future smart metering systems or those replacing smart metering systems in line with Article 19(6) of Directive (EU) 2019/944 of the European Parliament and of the Council(198)Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on rules for the internal market for electricity and amending Directive 2012/27/EU (OJ L 158/125, 14.6.2019),, which meet the requirements of Article 20 of Directive (EU) 2019/944, able to carry information to users for remotely acting on consumption, including customer data hubs; construction/installation of equipment to allow for exchange of specifically renewable electricity between users; construction and operation of interconnectors between transmission systems, provided that one of the systems is compliant. For the purposes of this Section, the following specifications apply: the rolling five-year period used in determining compliance with the thresholds is based on five consecutive historical years, including the year for which the most recent data are available; a 'system' means the power control area of the transmission or distribution network where the infrastructure or equipment is installed; transmission systems may include generation capacity connected to subordinated distribution systems; distribution systems subordinated to a transmission system that is deemed to be on a trajectory to full decarbonisation may also be deemed to be on a trajectory to full decarbonisation; to determine compliance, it is possible to consider a system covering multiple control areas which are interconnected and with significant energy exchanges between them, in which case the weighted average emissions factor across all included control areas is used, and individual subordinated transmission or distribution systems within that system is not required to demonstrate compliance separately; it is possible for a system to become non-compliant after having previously been compliant. In systems that become non-

compliant, no new transmission and distribution activities are compliant from that moment onward, until the system complies again with the threshold (except for those activities that are always compliant, see above). Activities in subordinated systems may still be compliant, where those subordinated systems meet the criteria of this Section; a direct connection or expansion of an existing direct connection to production plants includes infrastructure that is indispensable to carry the associated electricity from the power generating facility to a substation or to the network.

DO NO SIGNIFICANT HARM

DNSH ON WATER

N/A · NO APPLICABLE CRITERION

REQUIREMENT (VERBATIM)

N/A

DNSH ON BIODIVERSITY

Not aligned ● High

REQUIREMENT (VERBATIM)

The activity complies with the criteria set out in Appendix D to this Annex(202)Practical guidance for the implementation of this criterion is contained in the European Commission notice C(2018)2620 “Energy transmission infrastructure and EU nature legislation” (OJ C 213, 18.6.2018, p. 62)..

DNSH ON CIRCULAR ECONOMY

Not aligned ● High

REQUIREMENT (VERBATIM)

A waste management plan is in place and ensures maximal reuse or recycling at end of life in accordance with the waste hierarchy, including through contractual agreements with waste management partners, reflection in financial projections or official project documentation.

DNSH ON CLIMATE ADAPTATION

In-line ● Moderate

REQUIREMENT (VERBATIM)

The activity complies with the criteria set out in Appendix A to this Annex.

DNSH ON POLLUTION PREVENTION

Not aligned ● High

REQUIREMENT (VERBATIM)

Overground high voltage lines: for construction site activities, activities follow the principles of the IFC General Environmental, Health, and Safety Guidelines(199)Environmental, Health, and Safety (EHS) Guidelines of 30 April 2007 (version of [adoption date]: <https://www.ifc.org/wps/wcm/connect/29f5137d-6e17-4660-b1f9-02bf561935e5/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES&CVID=jOWim3p>).. activities respect applicable norms and regulations to limit impact of electromagnetic radiation on human health, including for activities carried out in the Union, the Council recommendation on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz) (200)Council Recommendation of 12 July 1999 on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz) (1999/519/EC) (OJ L 199, 30.7.1999, p. 59). and for activities carried out in third countries, the 1998 Guidelines of International Commission on Non-Ionizing Radiation Protection (ICNIRP)(201)ICNIRP 1998 Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 ghz) (version of [adoption date]: <https://www.icnirp.org/cms/upload/publications/ICNIRPemfgdl.pdf>).. Activities do not use PCBs polychlorinated biphenyls.

MINIMUM SOCIAL SAFEGUARDS

In-line

● Moderate

USER-STATED

REQUIREMENT (ARTICLE 18, TAXONOMY REGULATION)

Article 18, Regulation (EU) 2020/852: the activity is carried out in alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the ILO core conventions and the International Bill of Human Rights. In assessment practice this spans four pillars: human rights and labour, anti-corruption, taxation, and fair competition.



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Verbatim record of the dialogue on which this assessment is based. Questions were generated by Censatim; answers were provided by the user and are reproduced unedited. The findings in this report derive from these answers and from any documents listed under Information reviewed.

SUBJECT DESCRIPTION (AS PROVIDED)

Constantine Energy is an integrated renewable power company. We generate electricity from solar PV and onshore wind, and we operate part of the high-voltage transmission network connecting that generation to the grid.

QUESTIONS AND ANSWERS

Q1 Which electricity system(s) does Constantine Energy's high-voltage transmission network connect to? (For example: the interconnected European system, a Member State's national grid, a regional system, or a direct connection to a power plant.)

A1 Constantine Energy's transmission network connects to the interconnected European system, our infrastructure in Spain, Italy, Greece and Portugal all sits within interconnected EU Member State control areas.

Q2 What was the average lifecycle emissions intensity (in gCO₂e/kWh) of newly enabled generation capacity connected to your transmission network over the most recent rolling five-year period you can report?

A2 On average lifecycle emissions intensity of newly enabled generation capacity over the last five years: this has mostly been our own solar and wind capacity plus a modest amount of third-party renewable generation connecting into the network, so the average is low, around 15-20 gCO₂e/kWh across new connections, though I'd caveat that this figure is an estimate based on generation mix rather than a formal lifecycle assessment specific to each connection.

Q3 Has a climate risk assessment been carried out for your transmission network infrastructure covering future climate hazards (flooding, extreme heat, storms, drought, etc.)?

A3 A climate risk assessment has been carried out for the transmission network, covering flooding, extreme heat, storm/wind loading, and wildfire risk (particularly relevant given the Iberian and Greek locations), with a time horizon to 2050 using the same scenario range as the generation assets. Adaptation measures identified include vegetation management in higher wildfire-risk corridors and resilience upgrades to line infrastructure in flood-prone sections.

Q4 For the adaptation measures you identified (vegetation management in wildfire corridors and resilience upgrades in flood-prone sections), which of these have already been implemented, which are planned, and what is the target completion date for each?

A4 Vegetation management in wildfire-risk corridors is already implemented and ongoing, it's a standard part of our maintenance programme across the Iberian and Greek sections of the network. The flood-resilience upgrades are partially implemented, some priority sections identified as highest risk have been upgraded, with the remainder planned for completion by end of 2028.

Q5 Does Constantine Energy's transmission network pass through or operate near any designated protected areas (Natura 2000 sites, national parks, wetlands, or other conservation designations) in Spain, Italy, Greece, or Portugal?

A5 On protected areas: yes, sections of the transmission network pass near designated areas, most notably close to the Natura 2000 site near Constantine Solar Three in Attica, and there are a couple of other short corridor sections in Spain and Portugal that run adjacent to (but not through) designated wetland or conservation areas. Route selection for these sections was designed to avoid direct incursion into the protected boundaries.

Q6 Are there documented procedures or standards in place for the maintenance, repair, or end-of-life disposal of high-voltage transmission infrastructure (cables, transformers, insulators, towers) to minimise waste or recover materials?

A6 On maintenance and end-of-life procedures: yes, we have documented procedures covering transmission infrastructure. Transformers are maintained and refurbished where possible, with decommissioned units having oil drained and recovered by licensed contractors, and metal components (copper, steel, aluminium) recycled given scrap value. Insulators and cabling follow similar recovery-focused handling. Towers, when replaced, are dismantled and steel is recycled. This is documented practice rather than a single formal group-wide standard, so I'd note that distinction, practice is consistent but not yet codified into one policy document.

Q7 Pollution prevention documentation: No confirmation was provided that overground line construction follows IFC EHS Guidelines, that EMF exposure limits (Council Recommendation 1999/519/EC for EU operations) are met in practice, or that in-service transformer oil and equipment is PCB-free; Can you provide or confirm this?

A7 On pollution prevention documentation: I can confirm that overground line construction follows general industry good practice, but I cannot confirm formal adherence to the IFC EHS Guidelines specifically. On EMF exposure, our design standards are intended to keep exposure within recognised limits, but I don't have documented evidence confirming compliance with Council Recommendation 1999/519/EC in practice across all sections. On transformer oil, our newer transformers are PCB-free by specification, but I can't confirm a complete portfolio-wide PCB testing record covering all in-service units. These should be treated as unconfirmed rather than assumed compliant.

Q8 Biodiversity: EIA and Appropriate Assessment: No completed EIA or formal Appropriate Assessment has been confirmed for network sections near the Natura 2000 site in Attica or the designated areas in Spain and Portugal; Can you provide or confirm this?

A8 On biodiversity, EIA and Appropriate Assessment: confirmed, I have not confirmed a completed EIA or formal Appropriate Assessment specific to the network sections near the Attica Natura 2000 site or the Spanish and Portuguese designated areas. Route selection avoided direct incursion, but that's not the same as a completed statutory assessment for those sections, and this should be flagged as outstanding.

Q9 Consolidated waste management plan: End-of-life and recycling practices are consistent across the network but are documented at asset level rather than in a single group-wide policy referencing the waste hierarchy, and no contractual documentation with waste management partners has been. Can you provide or confirm this?

A9 On the consolidated waste management plan: confirmed, practice is consistent at asset level but not consolidated into a single group-wide policy referencing the waste hierarchy, and I don't have contractual documentation with waste management partners to evidence the arrangements described.

Q10 Formal lifecycle assessment for new connections: The 15-20 gCO₂e/kWh figure for newly enabled generation capacity is an internal mix-based estimate rather than a per-connection lifecycle assessment; Can you provide or confirm this?

A10 On the lifecycle assessment for new connections: confirmed, the 15-20 gCO₂e/kWh figure is an internal estimate based on generation mix, not a formal per-connection lifecycle assessment.

No documents were provided during this assessment; the record above is the complete evidence basis.