

An S&P Global Second Party Opinion (SPO) includes S&P Global Ratings' opinion on whether the documentation of a sustainable finance instrument, framework, or program, or a financing transaction aligns with certain third-party published sustainable finance principles. Certain SPOs may also provide our opinion on how the issuer's most material sustainability factors are addressed by the financing. An SPO provides a point-in-time opinion, reflecting the information provided to us at the time the SPO was created and published, and is not surveilled. We assume no obligation to update or supplement the SPO to reflect any facts or circumstances that may come to our attention in the future. An SPO is not a credit rating, and does not consider credit quality or factor into our credit ratings. See Analytical Approach: Second Party Opinions.

## Second Party Opinion

# California Housing Finance Agency 2024 Series **A Bonds**

Oct. 11, 2024

Location: United States Sector: Real Estate

#### Alignment With Principles

Conceptually aligned = O

Not aligned = X

Aligned = 🗸

- ✓ Social Bond Principles, ICMA, 2023
- ✓ Green Bond Principles, ICMA, 2021 (with June 2022 Appendix 1)
- ✓ Sustainability Bond Guidelines ICMA, 2021

See Alignment Assessment for more detail.

## Strengths

The California Housing Finance Agency (CalHFA) has a strong social license to operate in the communities it serves. Since its inception, CalHFA has helped more than 222,000 Californians purchase their first home via its affordable single-family loans and down payment assistance program, and helped preserve or build more than 78,000 affordable homes. CalHFA's ambitious education and counseling services, which aim to promote financial literacy and upward mobility to the populations it serves, underpin its efforts.

A stringent regulatory framework underscores compliance with social objectives. Various federal and state laws, with specific requirements to lend to and set aside housing for low- to moderate-income residents and maintain affordable rent levels for all residents, govern CalHFA's single-family mortgage loans and multifamily rental projects.

California has among the most ambitious state energy codes in the U.S., and the financed projects materially exceed state regulation. Three out of the five projects contain third-party green building certifications, GreenPoint and LEED, which exceed the 2019 version of Title 24. The

## Weaknesses

project that contains fossil fuel direct heating. Title 24 requires energy efficient furances and boilers. However, any fossil fuel direct heating, in our view, increases emissions lock-in risk and prolongs the asset life of a technology that is incompatible with a low carbon, climate resilient (LCCR) future.

This financing funds one new construction

#### Primary contact

#### Natalie Wu

San Francisco +1 415-371-5025 natalie.wu @spglobal.com

#### Areas to watch

#### CalHFA's processes for assessing and managing physical climate risks are limited.

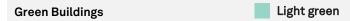
While it requires certain projects to purchase flood insurance, and Title 24 of the California Building Code stipulates additional protective building features for houses situated in wildfire-prone areas, the issuer lacks specific policies addressing physical climate risk. Additionally, one of its financed projects is located in a county with relatively high wildfire risk, though the project makes use of low water landscaping, which we believe partly mitigates water stress and wildfire risk.

remainder two projects contain heating
technologies that are not a hard requirement
of the code but are known to result in
significant energy savings and GHG emissions
reductions relative to traditional heating
sources.

## Eligible Green Projects Assessment Summary

Over the three years following issuance of the financing, California Housing Finance Agency expects to allocate 100% of proceeds to refinancing prior loans made for Green Buildings.

Eligible projects under the issuer's green finance transaction are assessed based on their environmental benefits and risks, using Shades of Green methodology.



Construction of new multifamily, affordable housing projects that have features and/or certifications that exceed the requirements set forth by the 2019 Title 24 of the California Building Code.

See Analysis Of Eligible Projects for more detail.

# **Issuer Sustainability Context**

This section provides an analysis of the issuer's sustainability management and the embeddedness of the financing transaction within its overall strategy.

# **Company Description**

CalHFA is a state agency established in 1975 that provides financing and programs that help low-and moderate-income individuals and families throughout the state access affordable housing, both as homebuyers and renters. Its mission is to invest in diverse communities with financing programs to advance its single- and multifamily programs. To date, CalHFA has funded the creation or preservation of more than 78,000 affordable homes and apartments for vulnerable populations. It is raising US\$ 107.655 million through its 2024 series A bonds to refinance loans made through CalHFA's multifamily division. The loans financed the construction of five multifamily affordable housing projects located in the state of California.

# Material Sustainability Factors

## Access and affordability

Low housing stock and lack of affordable options can severely influence people's livelihoods, especially vulnerable, low-income populations who can face the threat of homelessness. Access and affordability is especially important for residential tenants in areas where rents can account for a large percentage of residents' incomes. Lack of accessibility and affordability of commercial properties can also hinder the sustainable growth of local communities.

## Impact on communities

Properties, and by extension the owners, are inherently part of the communities in which they operate because they provide an essential service and can shape communities economically and socially. The residential sector is particularly meaningful to communities, where affordable housing and gentrification pressures can alter communities' social fabric and can be challenging to remediate.

Not-for-profit housing operators are not significantly exposed to consumer preferences as providers of safety-net accommodation. Rather, we see more localized risks related to residents being opposed to public housing or negative externalities (concerns about high crime, for example). Similarly, if a public housing association fails to keep its residents safe with proper housing standards, its reputation and relations with various stakeholders can be damaged, increasing risks around social cohesion and community unrest.

## Physical climate risk

The geographically fixed nature of real estate assets exposes them to physical climate risks. While varying by location, these could include acute risks (such as wildfires, floods, and storms), which are becoming more frequent and severe, as well as chronic risks (such as long-term changes in temperature and precipitation patterns and rising sea levels). Acute and chronic risks could damage properties or place tenant health and safety at risk.

These challenges can also require investments to manage the potential impact on, in severe cases, relocation of tenants. While aggregate impact is moderate—the type, number, and magnitude of these risks varies by region—highly exposed regions may be subject to material physical climate risk exposure. Most participants have some insurance coverage, but it could become more difficult to secure insurance for the most exposed assets in the future, absent adaptation.

## Climate transition risk

Energy use in buildings has been a major contributor to climate change, representing around a third of global GHG emissions on a final-energy-use basis according to the IEA. Embedded emissions from building materials and new construction may also

adversely affect progress toward future low-carbon climate resiliency goals. This leaves the sector highly susceptible to the growing public, political, legal, and regulatory pressure to accelerate climate goals.

Building occupiers and operators may face higher energy bills as power prices rise, and higher capital expenditures as upgrades are required to accommodate the energy transition and meet more stringent efficiency standards. Incremental climate-related investments can require significant capital outlays but will potentially reduce the risk of obsolescence due to changes in regulation or climate goals. In addition, low-carbon properties may achieve higher cost efficiencies or attract premium rents in the longer term, therefore enhancing their value.

# **Issuer And Context Analysis**

CalHFA's energy-efficient multifamily housing projects aim to address access and affordability, impact on communities, and climate transition risk. In our view, physical climate risk is also a relevant consideration as the frequency of extreme weather events, such as wildfires, increases in the state of California. CalHFA mitigates this risk via flood insurance policies, compliance with Title 24 of the California Building Code, which contains additional requirements for building homes in wildfire-prone areas, and use of low-water landscaping for certain properties.

By financing the preservation and creation of affordable housing in California, CalHFA directly addresses the issues of access and affordability. Its exclusive mission is to invest in diverse communities by providing financing programs that give more people access to affordable homes. They achieve this by offering single-family mortgage loans and down payment assistance for low-and moderate-income individuals, including first-time homebuyers. Additionally, CalHFA partners with local jurisdictions, developers, and private financial institutions to finance the construction and rehabilitation of multifamily rental homes. California is among the most unaffordable states in terms of housing in the country. Constructing more housing units, including affordable housing units, is a strategic priority for the state, which has a goal to build 2.5 million new homes by 2030. Given the decreasing availability of affordable housing in the state, CalHFA play an increasingly crucial role in promoting and preserving access and affordability for vulnerable populations in California.

CalHFA's affordable housing preservation and creation programs can provide social benefits for communities. From 2022-2023, CalHFA utilized over \$1.9 billion in lending activity and bond issuances to develop and preserve more than 4,200 affordable rental units for Californian families with incomes below 80% of the area median income (AMI). The agency's multifamily properties also have AMI restrictions because they are recipients of the Low-Income Housing Tax Credits (LIHTC). As a result, its projects select, or set aside, either 40% of units at 60% AMI or 20% of units at 50% AMI. We believe these lending practices effectively address both gentrification and income segregation risks. By targeting their investments toward economically disadvantaged populations, CalHFA plays a crucial role in maintaining the social fabric of local communities throughout California.

CalHFA addresses climate transition risk through its multifamily program, which complies with and/or exceeds the increasingly stringent Title 24 of the California Building Standard Code.

California has among the strictest energy codes in the U.S., having set a statewide goal to ensure all new residential construction would be ZNE by 2020. ZNE is defined as an energy-efficient building, where on a source basis, the actual annual consumed energy is less than equal to onsite renewable generated energy. Title 24 is refreshed every three years, with the latest update having been 2022. With each update, the code brings the California building energy standards into closer alignment with ZNE. We expect CalHFA's financed projects to follow the latest version of Title 24 at loan closing date.

The Financing's multifamily construction projects exceed the 2019 version of Title 24. The projects follow the 2019 version because the original loan closed in 2019, before the 2022 standards were published. The 2019 update of Title 24 mandated the inclusion of solar

photovoltaic (PV) systems in all new low-rise residential buildings and improved energy efficiency requirements for attics, walls, and windows, along with installing electric vehicle (EV)-capable infrastructure. The California Energy Commission (CEC) states a 2019 Title 24 compliant home with rooftop PV typically has an energy design rating (EDR) ranging from 15 to 27 out of 100. The EDR is a scoring metric that compares the energy efficiency performance of a home with one built according to the 2006 International Energy Conservation Code (IECC). Lower scores indicate better energy performance, and a score of zero represents a ZNE home. Outside of minor technical differences, the EDR is like the more widely used Home Energy Rating System (HERS) index, which is a national benchmark. All Series 2024A projects comply with the 2019 Title 24 requirements, and moreover, contain features and certifications indicating performance materially above that of the code. The 2019 version of Title 24 does not prohibit the use of fossil fuel direct heating in residential homes, nor does it require residential projects to reduce upfront embodied carbon emissions from construction.

The Financing addresses physical climate risks, which we view as a key sustainability issue because California is facing intensifying wildfire events and sea level rise. When physical risks such as wildfire and flooding materialize, the low- and moderate-income populations housed in the assets financed by CalHFA may have less financial capacity to rebuild their homes and communities. Certain loans issued by the agency are required to be covered by flood insurance. According to the Federal Emergency Management Agency (FEMA) National Risk Index, four out of five of the projects funded by these bonds are in counties with relatively moderate wildfire risk and one in a county with relatively high wildfire risk. The California Building Code requires buildings constructed in wildfire-prone areas to meet extra requirements to improve fire resistance, such as the use of fire-resistant exterior materials and maintenance of a defensible perimeter around a home to prevent flammable vegetation from igniting. These measures provide a degree of physical climate risk mitigation. Additionally, that property makes use of lowwater landscaping, which we consider a physical resilience trait. Although mitigating physical climate risk is not a focus of the Financing, we still view it as an area to watch given the material impact physical climate risk has on homes and occupants in California.

# **Alignment Assessment**

This section provides an analysis of the transaction's alignment to the Social and Green Bond principles and the Sustainability Bond Guidelines.

## Alignment With Principles

Aligned = 🗸

Conceptually aligned = •

Not aligned = X

- ✓ Social Bond Principles, ICMA, 2023
- ✓ Green Bond Principles, ICMA, 2021 (with June 2022 Appendix 1)
- ✓ Sustainability Bond Guidelines ICMA, 2021

## Use of proceeds

We assess all the transaction's green project categories as having a green shade and consider all social project categories to be aligned. The issuer commits to allocate the net proceeds issued under the transaction exclusively to eligible green and social projects. Please refer to the Analysis of Eligible Projects section for more information on our analysis of the environmental and social benefits of the expected use of proceeds. The issuance is a 100% refinancing of the developments' original mortgage loans, with the oldest loan dating back approximately four years. We view this lookback period as well within best market practices within the affordable housing sector.

## ✓ Process for project evaluation and selection

CalHFA evaluates its single and multifamily projects based on eligibility criteria that align with the federal tax-exempt bonds authority requirements and other state- and authority-mandated standards. There are eligibility terms for CalHFA's Tax-Exempt Permanent Loan Program, Conduit Issuer Program, and Mixed-Income Loan Program. All multifamily projects must also adhere to Title 24 and the State's Qualified Allocation Plan (QAP) criteria. The POS details project evaluation processes, such as how projects are approved and how CalHFA identifies and manages perceived social and environmental risks associated with eligible projects. Within CalHFA, multifamily staff within its multifamily programs division review and underwrite eligible projects. Projects are then presented to the agency's Senior Loan Committee and/or board for approval. Senior leaders at CalHFA, California Tax Credit Allocation Committee (CTCAC), and the California Debt Limit Allocation Committee (CDLAC) ensure that developments will provide quality housing at rent levels that low- and moderate-income families can afford, including confirmation of tax-exempt bond allocation. CalHFA's project evaluation process also involves a review of associated social and environmental risks and mitigants. Some risk-mitigating actions include recurring market surveys of appropriate AMI levels, mixing of income brackets in CalHFA-managed developments, and environmental impact assessments for every development.

# ✓ Management of proceeds

CalHFA will immediately apply the net proceeds of the series A 2024 bond issuance to repay the original loan financing for the construction of the affordable housing projects in the transaction portfolio. As such, we do not view a commitment to temporarily manage or periodically adjust the use of proceeds as necessary.

# ✓ Reporting

CalHFA provides the projects' qualitative environmental and social performance indicators in the POS, such as inclusion of EnergyStar appliances and compliance with state-level environmental regulations. Where applicable and feasible, quantitative performance indicators such as the projects' local area median income (AMI) bands served for its projects are included. As a quasi-public state agency subject to federal regulations, CalHFA is also legally mandated to conduct annual financial audits, including reviewing the allocation of the proceeds from the bond series. Separately, CalHFA's impact metrics for the projects are subject to audit by federal, state, and local governments, as well as mission-aligned third parties, as part of the LIHTC program.

# **Analysis Of Eligible Projects**

This section provides details of our analysis of eligible projects, based on their environmental benefits and risks, using the "Analytical Approach: Shades Of Green Assessments," as well as our analysis of eligible projects considered to have clear social benefits and to address or mitigate a key social issue.

## Green project categories

#### **Green Buildings**

#### **Assessment**

#### Description



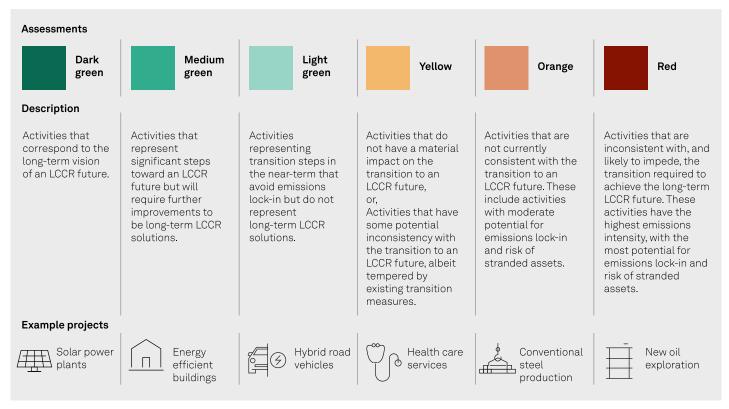
Construction of new multifamily, affordable housing projects which have features and/or certifications that exceed the requirements set forth by the 2019 Title 24 of the California Building Code.

#### **Analytical considerations**

- Real estate and the building sector are among the leading contributors to global greenhouse gas emissions. Enhancing the energy efficiency of residential homes, electrifying homes, and outfitting them with onsite renewable energy is key to reaching the goal of limiting warming to well below 2°C. According to the IPCC, the breakdown of average mitigation investment flows and investment needs until 2030 shows that energy efficiency is one area that requires the most significant investments.
- In our opinion, the financed projects contribute toward the gradual decarbonization of the residential building sector because they exceed the requirements in the 2019 version of Title 24. The original loans that financed the five multifamily projects closed in 2019. As a result, the projects adhere to the 2019 version of Title 24 of the California Energy Building Code, even though construction concluded in 2022 and 2023. Two of the projects are GreenPoint certified (basic GreenPoint certification and GreenPoint Gold certification). GreenPoint is a voluntary labeling scheme and points-based scoring system, similar to LEED. To be GreenPoint certified, a building must exceed the requirements of 2019 Title 24. A third project has obtained LEED Gold certification, which also exceeds local building code. While the two remaining projects do not have a third-party certification, they possess heat pumps and solar water heating, respectively. Neither of these technologies is a hard requirement of 2019 Title 24, and they materially reduce building energy demand and reduce greenhouse gas emissions from building water heating, since solar water heaters displace traditional, gas-fired ones. As a result of the certifications and additional features, we have assigned a shade of Light green to the financed projects.
- According to the U.S. Department of Energy (DOE), heat pumps can reduce home energy use by up to 75% relative to electric
  resistance heating such as furnaces and baseboard heaters. The DOE also estimates conventional water heating accounts for
  approximately 18% of home energy use. By electing to use a solar water heater instead, the project can fully displace the energy
  use and related greenhouse gas emissions associated with traditional water heating. The solar panels used to heat the home are
  also distinct form those used to generate onsite, renewable electricity. As a result, it is our opinion that these energy efficient
  features qualify as a material improvement over the state energy code.
- California has among the most aggressive climate action goals in the U.S. As a quasi-governmental entity, CalHFA is bound by these goals. The California Energy Efficiency Strategic Plan, passed in 2008, set forth an aspirational goal to achieve ZNE use in new residential construction by 2020 and all new commercial buildings by 2030. The state defines a ZNE building as an energy-efficient building where, on a source energy basis, the actual annual consumed energy is less than or equal to the on-site renewable generated energy. In 2007, the California Building Standards Commissions (CBSB) released the first-in-the-nation mandatory green buildings standards code, the California Green Buildings Standards Code (CalGreen). CalGreen is Part 11 of Title 24 of the California Building Code. The CBSC refreshes the CalGreen code every three years, with each refresh bringing the code closer to ZNE and the most recent refresh being in 2022. We note, however, that the financed projects are still likely to be more energy efficient than overall state building stock since most buildings were built according to prior versions of Title 24 and/or before the creation of the CalGreen code at all.

- The 2019 refresh was significant in that it mandated that low-rise residential buildings, defined as those three stories and below, install rooftop solar panels, and required mid-rise residential buildings, to be solar ready, meaning have the infrastructure in place to easily add solar panels after construction completion. In addition, the 2019 refresh also increased energy efficiency standards on windows and insulation requirements for walls. It also introduced a requirement to have some EV charging-ready infrastructure, meaning new residential buildings must include necessary infrastructure to support either immediate or future installation of EV chargers.
- The energy efficiency of residential buildings in California is measured by its EDR, a rating system designed by the CEC in 2019. The EDR largely parallels the more widely used HERS index, although there are minor differences. Both EDR and HERS score a home's energy efficiency on a scale of 0-100, with a score of 100 representing a new home constructed to the 2006 International Energy Conservation Code (IECC). A score of 0 on the EDR system represents a ZNE home. In both HERS and EDR, the contribution of onsite renewable energy may lower the overall score. The CEC estimates that a home compliant with the 2019 CalGreen Code, including rooftop solar, has a EDR score between 15 to 27, meaning it is estimated to be 73 to 85% more efficient than a home constructed according to 2006 IECC.
- The 2019 CalGreen Code does not prohibit the use of fossil-fuel direct heating, which we view as a weakness, though four of the five buildings financed in this portfolio use heat pumps. Additionally, the 2019 CalGreen Code does not require battery energy storage systems (BESS) to complement rooftop PV systems. Without BESS, onsite solar is often unable to meet nighttime electricity needs, which is typically when residential electricity usage peaks. As a result, the projects must draw from the local electricity grid, which contains fossil fuel generation, preventing the financed buildings from attaining ZNE, though we note that half of California's energy supply has been decarbonized. The 2022 refresh of the CalGreen code did introduce requirements for BESS and electrified heating for certain residential building types. We anticipate future CalHFA financed projects will comply with these requirements. However, it is unclear how many more refreshes of Title 24 are needed in order to bring the code fully in line with ZNE. Furthermore, as Title 24 becomes increasingly stringent, it will become increasingly difficult to operate a building that materially exceeds the code. Lastly, the 2019 CalGreen code does not require the use of low carbon building materials. We view the use of low carbon building materials as a best practice given that the majority of building lifecycle emissions are embodied in the upfront construction.
- CalHFA mitigates physical climate risk via insurance policies and compliance with Title 24 requirements. CalHFA requires projects located in a reas at risk of flooding, as delineated by FEMA, to purchase insurance. One of the five financed projects is located in a county with relatively high wildfire risk, while the other four are located in counties with relatively moderate wildfire risk, per the FEMA National Risk Index. The project located in a high wildfire risk area makes use of low water landscaping, which we view as a physical resiliency feature. Additionally, Chapter 7A of the 2019 California Building Code specifies building exterior requirements for buildings located in Fire Hazard Severity Zone or Wildland-Urban Interface Fire Areas, which help resist the intrusion of flames during wildfires. These requirements include using fire-resistant materials for exteriors; the maintenance of a defensible perimeter of at least 30 feet around the building to reduce flammable vegetation; and ember-resistant design. We note that does CalHFA does not have specific policies surrounding wildfire risk mitigation, which we view as material to Californian home builders and financiers. Whether the agency will develop concrete guidelines surrounding this topic is an Area to Watch

#### S&P Global Ratings' Shades of Green



Note: For us to consider use of proceeds aligned with ICMA Principles for a green project, we require project categories directly funded by the financing to be assigned one of the three green Shades.

LCCR--Low-carbon climate resilient. An LCCR future is a future aligned with the Paris Agreement; where the global average temperature increase is held below 2 degrees Celsius (2 C), with efforts to limit it to 1.5 C, above pre-industrial levels, while building resilience to the adverse impact of climate change and achieving sustainable outcomes across both climate and non-climate environmental objectives. Long term and near term--For the purpose of this analysis, we consider the long term to be beyond the middle of the 21st century and the near term to be within the next decade. Emissions lock-in--Where an activity delays or prevents the transition to low-carbon alternatives by perpetuating assets or processes (often fossil fuel use and its corresponding greenhouse gas emissions) that are not aligned with, or cannot adapt to, an LCCR future. Stranded assets--Assets that have suffered from unanticipated or premature write-downs, devaluations, or conversion to liabilities (as defined by the University of Oxford).

#### Social project categories

#### Affordable Housing

Refinancing permanent mortgage loans for five multifamily rental housing projects that provide affordable housing and include energy efficiency standards and features.

#### **Analytical considerations**

- The construction and preservation of affordable mixed-income housing will improve living conditions for low- and moderate-income residents in California by helping maintain and expand access to safe, affordable housing.
- CalHFA offers several loan programs with competitive rates and long-term financing to advance the creation and preservation of
  affordable housing to help address the shortage of affordable rental housing in California. The CalHFA Multifamily Programs
  provide permanent, long-term financing as well as financing for new construction or the acquisition, rehabilitation and/or
  development of an existing project. Each of the projects being funded by the 2024 series A bonds is now being permanently
  financed under the Tax-Exempt Loan Program. Four of the projects include Mixed-Income Program (MIP) subsidy loans. Each
  project includes affordability metrics that meet or exceed the affordability criteria as stipulated by the applicable Conduit Issuer
  Program, Tax-Exempt Loan Program, and MIP.
- We believe California Housing Finance Agency's use of AMI, a metric the U.S. Department of Housing and Urban Development (HUD) utilizes, is a best practice when defining low-income target populations. The target population is well defined and the groups selected are restricted to families whose household income falls between 30% to 80% of the local AMI. However, with MIP, the eligible AMI is 30% to 120% of AMI. However, of the 677 units (excluding seven manager units), are set aside for households at or below 80% of AMI, with some considerably below that. Therefore, excluding manager units, 100% of the projects will be at or below 80% of AMI. We believe the broad range of AMI brackets adequately seeks to minimize income segregation, which is a common social risk associated with affordable housing. In prior decades, government-sponsored public housing projects, which exclusively housed those with low incomes, had the unintended consequence of creating areas of economic disinvestment and, as a secondary consequence, areas of higher crime and safety concerns. By housing families and lending to individuals across a wide income band, CalHFA mitigates this social risk.
- Further, ancillary services such as childcare centers, financial capabilities courses, vocational development, proximity to a public library, common spaces for social uses, and/or health and wellness programs are provided at each of the properties. In addition, all multifamily developments are within a half mile of public transit, adjacent to a bus stop, or, in the case of the Brand Haven Senior Apartments, are on a para-transit route.
- We believe that CalHFA's established track record in providing affordable multifamily housing, combined with its comprehensive policies, procedures, and programs, such as aligning with California's QAP ensures that both perceived and realized social risks associated with the eligible projects are appropriately identified, managed, and mitigated.

# Mapping To The U.N.'s Sustainable Development Goals

Where the Financing documentation references the Sustainable Development Goals (SDGs), we consider which SDGs it contributes to. We compare the activities funded by the Financing to the International Capital Markets Association (ICMA) SDG mapping and outline the intended linkages within our SPO analysis. Our assessment of SDG mapping does not impact our alignment opinion.

This transaction intends to contribute to the following SDGs:

Use of proceeds	SDGs				
Green buildings					
	11. Sustainable cities and communities*				
Affordable housing			$\leftarrow \xrightarrow{\uparrow} \rightarrow$		
	1. No poverty*	7. Affordable and clean energy	10. Reduced inequalities	11. Sustainable cities and communities*	

<sup>\*</sup>The eligible project categories link to these SDGs in the ICMA mapping.

# **Related Research**

- Analytical Approach: Second Party Opinions: Use of Proceeds, Jul. 27, 2023
- FAQ: Applying Our Integrated Analytical Approach For Use-Of-Proceeds Second Party Opinions, Jul. 27, 2023

# **Analytical Contacts**

Primary contact

Natalie Wu San Francisco +1-628-219-3528 natalie.wu @spglobal.com Secondary contacts

Alán Bonilla San Francisco +1-415-371-5021 alan.bonilla @spglobal.com

Jennifer Craft
Denver
+1-303-721-4166
jennifer.craft

@spglobal.com

Research contributor

**Rimpal Acharya** Pune

Standard & Poor's Financial Services LLC or its affiliates (collectively, S&P) receives compensation for the provision of the Second Party Opinions product (Product). S&P may also receive compensation for rating the transactions covered by the Product or for rating the issuer of the transactions covered by the Product. The purchaser of the Product may be the issuer.

The Product is not a credit rating, and does not consider credit quality or factor into our credit ratings. The Product does not consider, state or imply the likelihood of completion of any projects covered by a given financing, or the completion of a proposed financing. The Product encompasses Use of Proceeds Second Party Opinions and Sustainability-Linked Second Party Opinions. An S&P Global Use of Proceeds Second Party Opinion provides an opinion on an issuer's sustainable finance instrument, program, or framework, and considers the financing in the context of the issuer's most material sustainability factors, the issuer's management of additional sustainability factors relevant to the sustainable financing, and provides an opinion regarding alignment with certain third-party published sustainable finance principles ("Principles"). An S&P Global Ratings Sustainability-Linked Second Party Opinion considers features of a financing transaction and/or financing framework and provides an opinion regarding alignment with relevant Principles. For a list of the Principles addressed by the Product, see the Analytical Approach, available at www.spglobal.com. The Product is a statement of opinion and is neither a verification nor a certification. The Product is a point in time evaluation reflecting the information provided to us at the time that the Product was created and published, and is not surveilled. The Product is not a research report and is not intended as such. S&P's credit ratings, opinions, analyses, rating acknowledgment decisions, any views reflected in the Product and the output of the Product are not investment advice, recommendations regarding credit decisions, recommendations to purchase, hold, or sell any securities or to make any investment decisions, an offer to buy or sell or the solicitation of an offer to buy or sell any security, endorsements of the suitability of any security, endorsements of the accuracy of any data or conclusions provided in the Product, or independent verification of any information relied upon in the credit rating process. The Product and any associated presentations do not take into account any user's financial objectives, financial situation, needs or means, and should not be relied upon by users for making any investment decisions. The output of the Product is not a substitute for a user's independent judgment and expertise. The output of the Product is not professional financial, tax or legal advice, and users should obtain independent, professional advice as it is determined necessary by users.

While S&P has obtained information from sources it believes to be reliable, S&P does not perform an audit and undertakes no duty of due diligence or independent verification of any information it receives.

S&P and any third-party providers, as well as their directors, officers, shareholders, employees, or agents (collectively S&P Parties) do not guarantee the accuracy, completeness, timeliness, or availability of the Product. S&P Parties are not responsible for any errors or omissions (negligent or otherwise), regardless of the cause, for reliance of use of information in the Product, or for the security or maintenance of any information transmitted via the Internet, or for the accuracy of the information in the Product. The Product is provided on an "AS IS" basis. S&P PARTIES MAKE NO REPRESENTATION OR WARRANTY, EXPRESS OR IMPLIED, INCLUDED BUT NOT LIMITED TO, THE ACCURACY, RESULTS, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE WITH RESPECT TO THE PRODUCT, OR FOR THE SECURITY OF THE WEBSITE FROM WHICH THE PRODUCT IS ACCESSED. S&P Parties have no responsibility to maintain or update the Product or to supply any corrections, updates, or releases in connection therewith. S&P Parties have no liability for the accuracy, timeliness, reliability, performance, continued availability, completeness or delays, omissions, or interruptions in the delivery of the Product.

To the extent permitted by law, in no event shall the S&P Parties be liable to any party for any direct, incidental, exemplary, compensatory, punitive, special or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs or losses caused by negligence, loss of data, cost of substitute materials, cost of capital, or claims of any third party) in connection with any use of the Product even if advised of the possibility of such damages.

S&P maintains a separation between commercial and analytic activities. S&P keeps certain activities of its business units separate from each other in order to preserve the independence and objectivity of their respective activities. As a result, certain business units of S&P may have information that is not available to other S&P business units. S&P has established policies and procedures to maintain the confidentiality of certain nonpublic information received in connection with each analytical process.

For PRC only: Any "Second Party Opinions" or "assessment" assigned by S&P Global Ratings: (a) does not constitute a credit rating, rating, sustainable financing framework verification, assessment, certification or evaluation as required under any relevant PRC laws or regulations, and (b) cannot be included in any offering memorandum, circular, prospectus, registration documents or any other document submitted to PRC authorities or to otherwise satisfy any PRC regulatory purposes; and (c) is not intended for use within the PRC for any purpose which is not permitted under relevant PRC laws or regulations. For the purpose of this section, "PRC" refers to the mainland of the People's Republic of China, excluding Hong Kong, Macau and Taiwan.

For India only: Any "Second Party Opinions" or "assessments" assigned by S&P Global Ratings to issuers or securities listed in the Indian securities market are not intended to be and shall not be relied upon or used by any users located in India.

Copyright © 2024 by Standard & Poor's Financial Services LLC. All rights reserved.