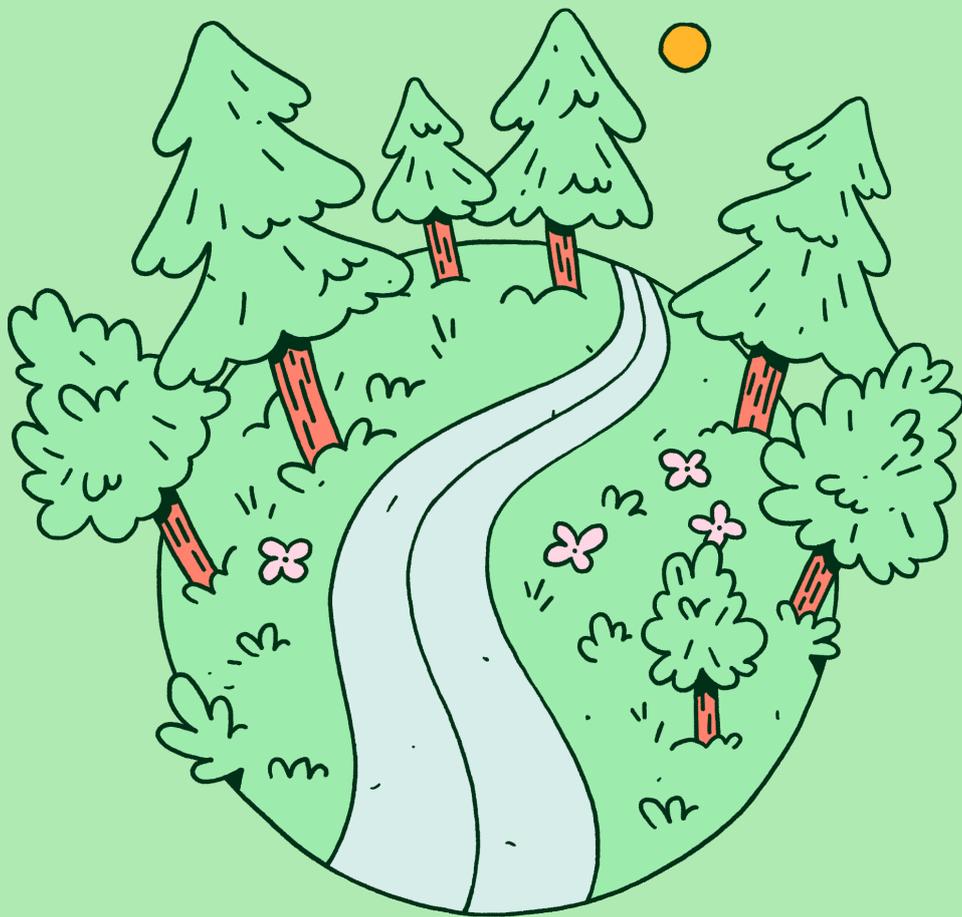


# Green Financing Framework 2025





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# About Fjellinjen

Fjellinjen AS is Norway's largest toll road operator, established in 1986 and commencing toll collection in 1990. Over the decades, Fjellinjen has played a pivotal role in financing sustainable traffic solutions for the Oslo region. Operating 83 toll stations that register over 32 million vehicle passages monthly, Fjellinjen ensures that toll revenues are effectively allocated to projects under Oslo Package 3 — a comprehensive plan extended to 2045, pending approval by the Norwegian Parliament (Stortinget).

Owned by Oslo Municipality (60%) and Akershus County (40%), Fjellinjen operates with a strong emphasis on responsible management, transparency, and operational efficiency. Through innovative technology and data analysis, the company ensures accurate toll registrations while supporting long-term mobility and environmental goals. In 2024, 98% of toll revenues were directed toward public transport, cycling and walking infrastructure, and urban development—projects aligned with Norway's zero-growth traffic goals and climate commitments.

## Sustainability at Fjellinjen

Fjellinjen's sustainability strategy is rooted in its societal mission to finance projects that promote greener, safer, and more efficient transport solutions. The company's primary contribution to sustainability

is achieved through the allocation of toll revenues to projects under Oslo Package 3.

The prioritized portfolio involves a joint effort to reduce greenhouse gas emissions, congestion, air pollution, and noise by ensuring that the growth in personal transportation is directed towards public transportation, cycling and walking.

It is estimated that the increase in toll rates according to the revised Oslo Package 3 agreement will lead to a traffic reduction by approximately 1% compared to 2024.

Green bonds issued by Fjellinjen serve as a supplementary financing tool to support these sustainable projects. In 2024, Fjellinjen allocated NOK 500 million from green bonds to eligible green projects under Oslo Package 3, such as the Fornebubanen and bicycle infrastructure.

The allocation of green bond proceeds is guided by Fjellinjen's Green Bond Framework, ensuring alignment with eligible green project categories. Green bond proceeds are separately tracked to ensure allocation to qualified projects.

Fjellinjen commits to annual reporting on the use of funds from green bonds and the environmental effects of financed projects. The reports will include details on the allocated amount per project, as well as measurable indicators such as the number of kilometers of bike paths built and the expected number of passengers per hour on the Fornebubanen. These indicators will help demonstrate progress towards sustainable transport solutions and provide a basis for estimating future environmental benefits, such as reductions in greenhouse gas emissions. As projects like the Fornebubanen become operational, Fjellinjen will work to include direct emissions data in future reports. Internally, Fjellinjen emphasizes reducing its

environmental footprint by adopting digital meeting platforms to minimize travel-related emissions. For business travel, employees are encouraged to use sustainable public transport whenever possible, aligning with the company's commitment to operational efficiency and environmental responsibility.

Ethical practices are central to Fjellinjen's operations. All suppliers must adhere to strict guidelines on human rights and working conditions, with compliance reviewed annually to ensure alignment with Fjellinjen's values.

To strengthen its focus on sustainability, Fjellinjen has developed a dedicated sustainability strategy and appointed a full-time sustainability officer responsible for its implementation. The company is actively preparing for compliance with the EU Corporate Sustainability Reporting Directive (CSRD) by implementing the Voluntary Sustainability Reporting Standard (VSME) for non-listed SMEs and commits to annual reporting on the use of green bond proceeds and their environmental impact.

As part of implementing VSME, Fjellinjen is working towards integrating climate risk disclosures in line with TCFD recommendations over time, in collaboration with project partners.

# Use of Road Tolls

## How the road tolls are spent

Each year, Fjellinjen generates approximately NOK 4.5 billion in toll revenues. In 2024, NOK 4.123 billion was allocated to Oslo Package 3—a comprehensive plan extended until 2045 for developing public transport, cycling and walking infrastructure, and urban development in Oslo and Akershus. Its main goals are to increase accessibility for all travelers, reduce emissions, and prioritize sustainable transportation modes while ensuring car traffic remains stable or declines.

Projects are selected based on environmental and sustainability criteria aligned with Oslo Package 3's goals, including reducing greenhouse gas emissions, achieving zero-growth in car traffic, and enhancing low-carbon mobility.

The revised agreement prioritizes investments in public transport, cycling, and pedestrian infrastructure, such as the Fornebubanen and cycling networks, to support climate-friendly urban development.

Key initiatives supported by toll revenues in 2024 included:

**Fornebubanen metro line:**  
NOK 1.095 billion allocated

**New trams and subway cars:**  
NOK 1.12 billion allocated

**New subway signaling system (CBTC):**  
NOK 272 million allocated

**Cycling and pedestrian paths:**  
NOK 233 million allocated

**Majorstuen Station upgrade:**  
NOK 191 million allocated

The Fornebubanen metro line will connect Majorstuen to Fornebu, providing sustainable transportation for up to 8,000 passengers per hour. Similarly, Oslo Municipality's long-term plan aims to create a connected network of bicycle lanes across the city—encouraging cycling as an alternative mode of transport.

## How the road tolls are collected

The main goals of the toll system that Fjellinjen administers are to:

- Finance public transport, urban development, and road projects
- Reduce private car traffic
- Increase accessibility for all travelers
- Reduce greenhouse gas emissions
- Improve urban environments

Toll charges are differentiated based on vehicle emission standards and time of passage. Electric vehicles pay less than diesel cars, while rush-hour rates are higher to reduce congestion and pollution. This approach supports environmental goals by controlling traffic and financing sustainable projects.

## UN Sustainable Developments Goals

Fjellinjen aligns its sustainability efforts with the UN Sustainable Development Goals (SDGs), focusing specifically on SDGs 11 (Sustainable Cities and Communities) and 13 (Climate Action). These goals guide Fjellinjen's strategy in contributing to sustainable urban mobility while addressing global challenges

- SDG 11: The bicycle lane network and Fornebubanen improve accessibility and promote sustainable urban living, supporting Oslo's vision as a car-light city.
- SDG 13: Projects like the Fornebubanen are expected to contribute to significant reductions in greenhouse gas emissions by promoting sustainable transportation modes.

By linking toll revenues and green bond proceeds to these measurable outcomes, Fjellinjen plays a key role in advancing sustainable development in the Oslo region.



# Green Financing Framework

1. Use of Proceeds
2. Selection and Evaluation of Eligible Projects
3. Management of Proceeds
4. Reporting
5. External Review

## Framework Structure

As part of Fjellinjen's continued commitment to sustainability, a Green Finance Framework (the "Framework") has been developed. The structure of the Framework is developed to be in line with both the ICMA Green Bond Principles (GBP) 2021, as well as the LMA and APLMA Green Loan Principles (GLP) 2021, and therefore consists of four key pillars as well as a strongly recommended External Review component:

1. Use of proceeds
2. Process for project evaluation and selection
3. Management of proceeds
4. Reporting
5. External review

It is Fjellinjen's intention to follow the best market practices in relation to Green Bonds and Loans as the market develops. Therefore, the Fjellinjen Green Finance Framework may be amended and/or updated to reflect the changes in market practice or the company's overall sustainability focus.

## Green Financing Framework

The international Capital Markets Association (ICMA) Green Bond Principles (GBP) are a set of voluntary guidelines that recommend and promote transparency and disclosure. GBP promote integrity in the development of the green bond market by clarifying the approach for issuing a green bond. This Green Financing Framework is based on the 2021 version of the GBP. It is Fjellinjen's intention to follow best practices in the market as the standards develop and as such the Framework may be updated from time to time.

In addition to Green Finance Instruments issued by Fjellinjen in the capital market, the company may have Green Loans provided by lending institutions. The same criteria for Eligible Assets specified in the Green Finance Framework applies for Green Loans. Green Loans taken by Fjellinjen may be provided by lending institutions that finance these by issuing Green Bonds. Fjellinjen will report the aggregate amount of Green Loans taken and specify each Eligible Asset that has been financed by a Green Loan in a separate section of the Green Finance Investor report.



## Exclusions

Green Bonds and Loans net proceeds will not be allocated to projects for which the purpose of the project is fossil energy production, nuclear energy generation, weapons and defense, potentially environmentally harmful resource extraction (such as rare-earth elements or fossil fuels), gambling or tobacco.

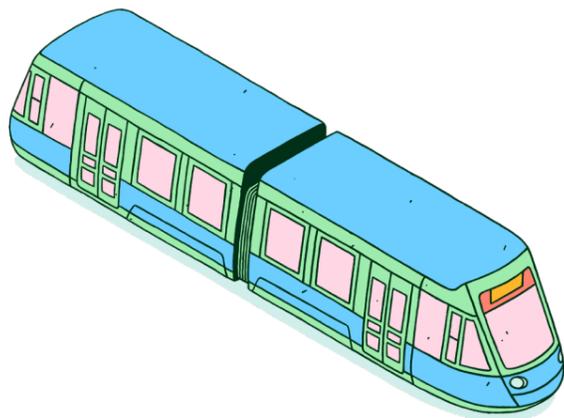
Additionally, net proceeds will not be allocated to infrastructure that supports fossil fuel vehicles (e.g., hybrid buses or parking facilities beyond minimal transit needs). This ensures alignment with Fjellinjen's commitment to sustainable mobility and climate goals.

# 1. Use of Proceeds

The net proceeds of the Green Bonds or Loans issued by Fjellinjen will be used to finance or re-finance Eligible Projects that have been evaluated and selected by Fjellinjen in accordance with this Green Financing Framework. Refinancing of Eligible Projects will have a look-back period of no longer than 3 years from the time of issuance. In Oslo and Akershus, climate projections from the Norwegian Climate Service Centre and Oslo Municipality indicate increased extreme rainfall (up to 30% more intense daily precipitation), a relative sea level rise of approximately 47 cm by 2100 under high emissions, and a temperature increase of up to 4°C, leading to more urban flooding and heatwaves. Fjellinjen's financing addresses these challenges by supporting low-carbon transport solutions and climate-resilient urban development. The table on the next page will define the criteria for projects in which Fjellinjen can spend Green Use of Proceeds under this framework. These projects will be defined as "Eligible Projects".

Projects financed under this framework contribute to Climate Change Mitigation through Clean Transportation, aligned with EU Taxonomy Activity 6.1 (Passenger Rail Transport). We recognize the EU Taxonomy's 'Do No Significant Harm' (DNSH) principle but do not pursue compliance due to reliance on third-party data and no plans for standalone DNSH analyses. Minimum safeguards are ensured through our Ethical Guidelines, aligned with UN Global Compact principles. We remain open to collaborating with partners to enhance environmental reporting in the future.

All funds allocated under this framework must comply with Fjellinjen's Ethical and Sustainable Management Guidelines. These guidelines ensure alignment with UN Global Compact principles, covering human rights, labor conditions, environmental responsibility, and anti-corruption measures. Fjellinjen requires all financial service providers and project contractors to adhere to these principles as part of their contractual obligations.



## Fjellinjens Eligible Projects

Categories	Eligible Projects	UN SDG's
Clean Transportation	Railways and public transport Construction, reconstruction and upgrading of railroad, trams and supporting infrastructure	 <p>Take urgent action to combat climate change and its impacts</p>
	Enabling carbon neutral solutions Development and maintenance of bicycle lanes and pedestrian pathways and supporting infrastructure such as tunnels, fences etc.	 <p>Take urgent action to combat climate change and its impacts</p>

## 2. Selection and Evaluation of Eligible Projects

Fjellinjen has established a Green Finance Committee (GFC) to evaluate and select assets that are in line with the criteria set out in the use of proceeds section.

The committee meets at least on an annual basis or when needed. The Green Finance Committee is comprised of representatives from Treasury, Group Sustainability and Business Control. The sustainability function will have veto.

The Green Finance Committee will evaluate the compliance of proposed projects and associated suppliers with Fjellinjen's Ethical and Sustainable Management Guidelines. This includes ensuring

adherence to UN Global Compact principles and fostering responsible supply chain practices.

Fjellinjen collaborates with third-party project owners to ensure that financed projects align with the goals of this framework.

On a best effort basis, the committee is also responsible for reviewing and updating the content of the Green Finance Framework and managing any future updates of this document to reflect relevant changes in the company's corporate strategy, technology, and market developments.

The Green Finance Committee is responsible for:

- Evaluating the compliance of proposed assets with the eligibility criteria outlined in the Use of Proceeds section above.
- Encouraging project partners to assess potential lock-in effects and incorporate lifecycle analyses into their project planning where applicable.
- Ensuring that the pool of Eligible Assets is aligned with the categories and criteria as specified in the Use of Proceeds section.
- Replacing investments that no longer meet the eligibility criteria (e.g. following divestment, liquidation, concerns regarding alignment of underlying activity with eligibility criteria, etc.).

## 3. Management of Proceeds

Fjellinjen will establish a Green Financing Register with the purpose to monitor Eligible Projects financed by the Green Bonds and Loans issued by Fjellinjen as well as provide an overview of the allocation of the net proceeds from the Green Bonds and Loans issued to the respective Eligible Projects.

The value of the Eligible Projects detailed in the Green Financing Register will at least equal the aggregate net proceeds of all outstanding Fjellinjen

Green Bonds and Loans. There may be periods when the total outstanding net proceeds of Green Bonds and Loans exceed the value of the Eligible Projects in the Green Financing Register. Proceeds yet to be allocated towards Eligible Projects will be held in accordance with Fjellinjen liquidity management policy and managed as such. The Green Financing Register will form the basis for the impact reporting.



# 4. Reporting

To enable investors to follow the development and to provide insight to prioritized areas Fjellinjen will provide a Green Financing Investor Report on an annual basis. Fjellinjen intends to report on quantitative impact indicators where feasible and relevant data information is available. The Green Financing Investor Report will include the two following reports:

## Allocation Reporting

1. A description of the portfolio of Eligible Assets;
2. Type of financing instruments utilized and respective outstanding amounts;
3. Information on the split between new financing and re-financing;
4. A list of Eligible Assets including the amounts allocated, including allocated and disbursed amounts per category and geographical distribution.

## Impact Reporting

The impact reporting aims to disclose the environmental impact of the Eligible Assets financed under this Framework, based on Fjellinjen financing share of each project. As Fjellinjen can finance large and small Eligible Assets in the same Project Category, impact reporting will, to some extent, be aggregated.

The impact assessment is provided with the reservation that not all related data can be covered and that calculations therefore will be on a best effort basis, reflecting contributions to sustainable mobility and resilience against climate challenges like increased precipitation and flooding in Oslo and Akershus. The impact assessment will, if applicable, be based on the Key Performance Indicators (KPIs) presented in the table.

To improve data quality and consistency, Fjellinjen will collaborate with project partners to promote the use of standardized reporting methodologies for impact data.

GBP Categories	Examples of impact indicators
Clean Transportation	Added passenger capacity of public transportation <ul style="list-style-type: none"> <li>• Amount of capacity measured in number of people per year as a result of the investments</li> </ul> Estimated added passenger kilometres <ul style="list-style-type: none"> <li>• Km of projects build</li> </ul>

# 5. External Review

## Second party opinion (pre-issuance)

To secure alignment with national and international guidelines, Fjellinjen has engaged Moody's to act as an external verifier of this Green Financing Framework and the Eligible Projects.

## Third-Party Review (post-issuance)

Fjellinjen will appoint an external independent auditor to annually assure that the selection process

for the financing of Eligible Projects and that the allocation of the net proceeds of the Green Financing are done in accordance with Fjellinjen's Green Financing Framework.

## Publicly Available Documents

The Green Financing Framework, the second party opinion, the third-party review, and the Green Financing Investor Report will be publicly available on Fjellinjen's website.

