

TINE SA

SECOND PARTY OPINION: TINE GREEN BOND
FRAMEWORK

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Disclaimer

Our assessment relies on the premise that the data and information provided by the client to us as part of our review procedures are provided in good faith. Because of the selected nature (sampling) and other inherent limitation of both procedures and systems of internal control, there remains the unavoidable risk that errors or irregularities, possibly significant, may not be detected. Limited depth of evidence gathering including inquiry and analytical procedures and limited sampling at lower levels in the organization were applied as per scope of work. DNV expressly disclaims any liability or co-responsibility for any decision a person or an entity may make based on this Statement.

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DNV'S INDEPENDENT ASSESSMENT

Scope and Objectives

TINE SA ("TINE" or the "Issuer") is a Norwegian cooperative owned by over 7,700 dairy farmers, operating across the full value chain from milk collection to processing, distribution, and export. As Norway's largest dairy company, TINE plays a central role in national food production and rural development, with operations spanning 29 dairies and terminals, and an international footprint through subsidiaries in the United States, Ireland, Sweden, and the United Kingdom. The company's product portfolio includes brands such as Jarlsberg, Norvegia, Fjordland, and Diplom-Is.

Sustainability is a strategic priority for TINE, reflected in its long-term goals to reduce greenhouse gas emissions, improve resource efficiency, and promote sustainable agriculture. The company has committed to a 42% reduction in Scope 1 and 2 emissions by 2030, alongside a 30% reduction in emissions per kilogram of milk produced. These targets are supported by a climate transition plan and a forthcoming commitment to the Science Based Targets initiative (SBTi). TINE's approach integrates environmental considerations across its operations, including investments in low-emission logistics, renewable energy systems, circular packaging, and sustainable farming practices.

Recent examples of eligible investments include the expansion of the energy system at TINE Jæren, which integrates high-temperature heat pumps, thermal energy storage, and energy wells to reduce fossil fuel use and improve energy flexibility. Another project involves the deployment of 32 electric trucks to decarbonize distribution activities, representing a significant step toward fossil-free logistics. Additionally, the wastewater treatment upgrade at TINE Dovre aims to ensure compliance with environmental discharge regulations through improved process control and infrastructure.

To support its environmental objectives, TINE has established a Green Bond Framework (henceforth referred to as "Framework"). The Framework enables the financing and refinancing of projects that contribute to Climate Change Mitigation, Biodiversity, Circular Economy, Sustainable Use and Protection of Water. Eligible projects may be undertaken by TINE SA or its subsidiaries and financed through internal loans or equity participations, provided that at least 90% of revenues are derived from eligible activities. TINE has confirmed that the remaining 10% will not be associated with excluded sectors, ensuring consistency with its sustainability commitments. Through the Framework, TINE seeks to align its financing strategy with its sustainability ambitions, enhance transparency, and engage stakeholders in its transition toward a more resilient and environmentally responsible food system. The Framework is in alignment with the stated Standards and Principles (collectively the "Principles & Standards"):

- International Capital Market Association ("ICMA") Green Bond Principles 2025 ("GBP")

DNV Business Assurance Norway AS ("DNV") has been commissioned by TINE to review its Framework and provide a Second Party Opinion on the Framework, based on the Principles & Standards.

Our methodology to achieve this is described in 'Work Undertaken' below. We were not commissioned to provide independent assurance or other audit activities.

Responsibilities of the Management of TINE and DNV

The management of TINE has provided the information and data used by DNV during the delivery of this review. Our statement represents an independent opinion and is intended to inform TINE management and other interested stakeholders in the Green Finance Instrument as to whether the GFI is aligned with the GBP. In our work we have relied on the information and the facts presented to us by TINE. DNV is not responsible for any aspect of the nominated assets referred to in this opinion and cannot be held liable if estimates, findings, opinions, or conclusions are incorrect. Thus, DNV shall not be held liable if any of the information or data provided by TINE's management and used as a basis for this assessment were not correct or complete.

Basis of DNV's Opinion

We have adapted our assessment methodology to create the TINE-specific Eligibility Assessment Protocol (henceforth referred to as "Protocol"). Our Protocol includes a set of suitable criteria that can be used to underpin DNV's opinion.

As per our Protocol, the criteria against which the Framework has been reviewed are grouped under the four core components:

1. Use of Proceeds

The Use of Proceeds criteria are guided by the requirement that an issuer of a bond must use the funds raised to finance or refinance or to repay equity of eligible activities. The eligible activities should produce clear environmental benefits.

2. Process for Project Evaluation and Selection

The Project Evaluation and Selection criteria are guided by the requirements that an issuer of a bond should outline the process it follows when determining eligibility of an investment using GFI proceeds and outline any impact objectives it will consider.

3. Management of Proceeds

The Management of Proceeds criteria are guided by the requirements that a bond should be tracked within the organization, that separate portfolios should be created when necessary and that a declaration of how unallocated funds will be handled.

4. Reporting

The Reporting criteria are guided by the recommendation that at least annual reporting should be made of the use of proceeds and that quantitative and/or qualitative performance indicators should be used, where feasible.

No assurance is provided regarding the financial performance of instruments issued via the Framework, the value of any investments, or the long-term environmental benefits of the transaction. Our objective has been to provide an assessment that the Framework has met the criteria established on the basis set out below.

Work Undertaken

Our work constituted a high-level review of the available information, based on the understanding that this information was provided to us by TINE in good faith. We have not performed an audit or other tests to check the veracity of the information provided to us. The work undertaken to form our opinion included:

- Creation of a Protocol, adapted to the purpose of the bond, as described above and in Schedule 2 to this Assessment;
- Assessment of documentary evidence provided by TINE on the bond and supplemented by high-level desktop research. These checks refer to current assessment best practices and standards methodology;
- Review of published materials by TINE and TINE's website;
- Discussions with TINE's management, and review of relevant documentation and evidence related to the criteria of the Protocol; and
- Documentation of findings against each element of the criteria.

Our opinion as detailed below is a summary of these findings.

Findings and DNV's Opinion

DNV's findings on the alignment with Principles & Standards are listed below:

1. Use of Proceeds

TINE's Green Bond Framework outlines that net proceeds will finance or refinance Eligible Green Projects as defined by the following eligible project categories:

- Energy Efficiency
- Renewable Energy
- Clean Transportation
- Sustainable Water and Wastewater Management
- Circular Economy Adapted Products, Production Technologies and Processes
- Environmentally Sustainable Management of Living Natural Resources and Land Use

The Framework ensures that net proceeds from green bonds are allocated to projects within TINE or its subsidiaries that meet strict eligibility criteria. For subsidiaries, at least 90% of their revenues must come from qualifying activities, and the remaining 10% must not be linked to sectors/projects list under "exclusions" in the Framework.

DNV has reviewed the Framework and its alignment with the Principles and confirmed that the environmental benefits — such as reduced greenhouse gas emissions, improved energy and resource efficiency, enhanced biodiversity, and better animal welfare — are clear, measurable, and relevant. The framework also allows for refinancing of existing investments within a 36-month look-back period, supporting both new and past initiatives that contribute to TINE's sustainability goals.

DNV undertook an analysis of the associated project type to determine the eligibility as Green and in line with the Principles & Standards. DNV concludes that the eligible categories outlined in the Framework are consistent with the categories outlined in the Principles & Standards.

2. Process for Project Evaluation and Selection

TINE has established a robust governance structure to ensure that projects financed through Green Bond proceeds meet strict environmental and social criteria, in alignment with its sustainability strategy. Projects are selected based on their contribution to environmental goals — such as reducing greenhouse gas emissions, improving resource efficiency, and promoting sustainable agriculture — and must undergo documented assessments of environmental and social risks. The Investment Committee, chaired by the CFO and including senior representatives from across the organization, evaluates each project against the Green Financing Framework and internal policies, with authority to exclude non-compliant projects. The Framework also includes exclusion criteria to prevent financing of activities such as fossil fuel operations, human rights violations, and practices that conflict with TINE's Code of Conduct. TINE's Ethical Trading Guidelines further reinforce its commitment to responsible business practices across social and environmental dimensions.

DNV concludes that TINE's Framework appropriately describes the process for Project Evaluation and Selection.

3. Management of Proceeds

DNV confirms that TINE has a transparent and well-defined process for managing net proceeds from its Green Finance Instruments, tracked through a dedicated internal "Green Register." This register ensures that proceeds are allocated exclusively to eligible projects, with oversight from the Investment Committee. The process is governed by formal internal procedures and includes mechanisms to reallocate funds if a project is sold or no longer meets eligibility criteria. TINE also maintains continuous

oversight and adjusts the balance of tracked proceeds as disbursements occur. In cases of temporary surplus, unallocated funds are held in TINE's liquidity reserve and may be invested in low-risk instruments, never in conflict with the exclusion criteria.

DNV has reviewed the evidence presented and concludes that the Framework appropriately describes the process for Management of Proceeds.

4. Reporting

TINE has committed to publishing an annual Green Bond Report for as long as there are outstanding proceeds from its Green Finance Instruments, along with timely updates in case of material changes. The report includes an Allocation Report detailing financed projects, funding distribution between new and refinanced investments, and any unallocated proceeds, as well as an Impact Report presenting relevant metrics for each Green Project Category. While reporting is on a best-effort basis, DNV confirms that the metrics are well defined and aligned with the Framework's objectives, ensuring transparency. DNV concludes that the proposed reporting is consistent with the Principles.

Based on the assessment procedures conducted, nothing has come to our attention that causes us to believe that the Green Bond Framework is not, in all material respects, in accordance with the pre-issuance requirements of the associated eligible Green Project Categories, and the Principles.

For DNV Business Assurance Norway AS

Oslo, Norway / 3rd November 2025



George Oakman

Quality Reviewer



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Schedule 1. Description of TINE's Eligible Green Project Categories and Environmental Benefits

Eligible Green Project Categories

Energy Efficiency



Projects in TINE's Green Bond Energy Efficiency category are expected to deliver substantial reductions in energy consumption and greenhouse gas emissions, aligning with SDG 7 (Affordable and Clean Energy) and SDG 13 (Climate Action).

Eligible Criteria and Description	Production <i>New or upgraded production facilities needed to produce, store, and distribute products, where it can be proven a 30% lower energy usage per litre of milk compared to pre investment situation.</i>
DNV Findings	Investments in more energy-efficient production facilities will significantly reduce the energy intensity of dairy processing. This not only lowers operational emissions but also sets a benchmark for sustainable food manufacturing in Norway. By reducing energy demand per litre of milk, these projects help decouple production growth from energy consumption, supporting national energy efficiency goals and reducing pressure on the electricity grid. The improvements also enhance competitiveness by lowering energy costs and increasing resilience against future energy price volatility. TINE's strategy to reduce energy usage per litre of milk by 30% places its production facilities firmly in line with advanced industry standards. The dairy sector has increasingly focused on energy audits and benchmarking systems — such as ENERGY STAR's Plant Energy Performance Indicator (EPI) — that recognize performance at the top 25% as exemplary.¹ By achieving such efficiency, TINE not only meets but contributes to raising baseline practices in dairy manufacturing, supporting national energy conservation objectives and reinforcing sector-wide competitiveness. This positions TINE as a leader in sustainable food production, helping catalyse a shift to energy-efficient operations across the Norwegian dairy industry. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.
Eligible Criteria and Description	Energy improvements <i>Energy efficiency in production lines and operations, such as heat recovery and exchange systems, frequency converters, upgrading production units. Investments should improve energy efficiency in the respective area by at least 30%.</i>
DNV Findings	Enhancing energy performance in existing operations provides immediate and measurable climate benefits. By optimising energy use and reducing waste heat, these measures contribute to a more resource-efficient value chain. Beyond emissions reduction, such improvements demonstrate how traditional food industries can integrate advanced energy management practices, creating a replicable model for other sectors. This approach supports Norway's broader transition to a low-carbon economy and strengthens the industry's

¹ [ENERGY STAR Focus on Energy Efficiency in Dairy Processing | ENERGY STAR](#)

	ability to meet future regulatory and market expectations. The International Dairy Foods Association and EPA have challenged the dairy industry to improve their energy efficiency by 10% within 5 years. ¹ TINE's approach aligns with these best practices and, by incorporating circular waste heat management, further contributes to industrial sustainability. This not only mitigates operational emissions but also exemplifies a replicable model that can inspire industry-wide adoption of resource-efficient technologies. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.
Eligible Criteria and Description	<i>Heat pumps</i> <i>Electric heat pumps</i>
DNV Findings	Replacing fossil-based heating with electric heat pumps delivers a dual benefit: eliminating direct fossil fuel use and enabling greater integration of renewable electricity. These systems also allow for the recovery and reuse of surplus heat, reducing overall energy demand. This also enhances energy security and operational stability, while reducing exposure to carbon pricing and fossil fuel supply risks. This transition well positions TINE in industrial decarbonization and demonstrates the viability of electrification in energy-intensive processes. Large-scale, high-temperature electric heat pumps are rapidly gaining traction in industrial dairy operations around the world, delivering both heating and cooling efficiencies while bypassing fossil fuel use. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.
Eligible Criteria and Description	<i>Cooling display cases and cold rooms</i> <i>Cooling display cases and cold rooms needed to store and distribute products where it can be proven that</i> <i>a) the system is rated in the highest two populated classes of energy efficiency in accordance with Regulation (EU) 2017/1369 or;</i> <i>b) result in an energy efficiency improvement of 30% compared to the system replaced, or;</i> <i>c) the system recycles 50% of the excess heat.</i>
DNV Findings	Upgrading cooling systems to high-efficiency standards reduces electricity consumption in storage and distribution, which are traditionally energy-intensive stages of the value chain. The ability to recover and reuse excess heat further amplifies the environmental benefit by reducing thermal losses and supporting integrated energy systems. These improvements not only cut emissions but also align with best available technologies, ensuring compliance with EU energy efficiency standards and reinforcing TINE's commitment to sustainable logistics and retail operations. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.

Eligible Green Project Categories

Renewable Energy



Investments in renewable energy under this category will significantly reduce greenhouse gas emissions, improve resource efficiency, and support the transition to a low-carbon economy. These projects contribute to SDG 7 (Affordable and Clean Energy) by increasing the share of renewable energy and to SDG 13 (Climate Action) by reducing reliance on fossil fuels.

Eligible Criteria and Description	Solar power <i>Electricity generation using solar, such as on-site solar rooftop panels</i>
DNV Findings	On-site solar installations generate clean electricity, reducing dependence on grid power and lowering Scope 2 emissions. This directly displaces fossil-based electricity, cutting carbon intensity and improving energy resilience. Solar power also reduces transmission losses and supports decentralized energy systems, which are critical for sustainable food production. Moreover, on-site solar panels at TINE facilities generate clean electricity, reducing dependence on Norway's grid during peak demand periods. While Norway's grid is largely renewable, solar power adds resilience and helps offset seasonal variations in hydropower availability. This localized generation lowers indirect emissions, supports energy security, and demonstrates how food producers can integrate distributed renewable solutions without compromising land use. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.
Eligible Criteria and Description	Waste heat <i>Production of heat/cool using waste heat</i>
DNV Findings	Recovering and utilising waste heat from industrial processes reduces the need for additional energy input, thereby lowering overall energy demand and associated emissions. By capturing thermal energy that would otherwise be lost, these projects improve system efficiency and reduce reliance on fossil fuels for heating and cooling. This approach also minimizes thermal pollution, contributing to better environmental stewardship. In Norway's cold climate, efficient heat recovery is particularly valuable for reducing peak loads during winter. By capturing thermal energy that would otherwise be lost, TINE improves overall system efficiency and minimizes environmental impact from excess heat discharge. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.

Eligible Criteria and Description	<i>District heating</i> <i>Pipelines and associated infrastructure for distribution of heating and cooling, ending at the sub-station or heat exchanger.</i>
DNV Findings	District heating systems powered by renewable sources or waste heat provide efficient thermal energy distribution, reducing the need for individual fossil-fuel-based boilers. This centralized approach lowers emissions, optimizes energy use, and enables integration of multiple renewable sources. It also supports long-term decarbonization of industrial and community heating networks. By this approach TINE can contribute to regional energy optimization and reduce lifecycle emissions beyond its own operations. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.
Eligible Criteria and Description	<i>Biogas</i> <i>Production of biogas utilizing anaerobic digestion of organic material and manure sourced from the local farms. The produced biogas is used directly for the generation of electricity or heat or upgraded to bio-methane for injection in the natural gas grid or used as vehicle fuel or as feedstock in chemical industry. Residual material is returned to the farmers to be used as fertilizer or soil improver.</i>
DNV Findings	Producing biogas through anaerobic digestion of manure and organic residues creates a circular energy system that reduces methane emissions from untreated waste. Using biogas for heat, electricity, or transport fuel displaces fossil energy and cuts greenhouse gas emissions significantly. Returning digestate to farms as fertilizer closes nutrient loops, reducing reliance on synthetic fertilizers and improving soil health. Furthermore, using biogas for heat, electricity, or transport fuel reduces greenhouse gas emissions significantly and contributes to supporting sustainable agriculture in Norway's rural communities. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.
Eligible Criteria and Description	<i>Biomass</i> <i>Biomass facility that run primarily on locally sourced residual material such as wood pellets, as well as associated infrastructure.</i>
DNV Findings	Utilising locally sourced residual biomass for heat generation reduces fossil fuel consumption and promotes sustainable resource use. Biomass projects help manage forestry residues, prevent waste accumulation, and support carbon-neutral energy systems when sourced responsibly. This contributes to climate mitigation while maintaining rural economic activity and ecosystem health. Especially in the Nordics, where forestry residues are abundant, biomass projects help manage waste streams and support carbon-neutral energy systems when sourced responsibly. This approach strengthens rural economies and aligns with national strategies for renewable heat. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.

Eligible Green Project Categories

Clean Transportation



Transitioning TINE's logistics fleet to electric, hydrogen, and biogas vehicles—and investing in associated infrastructure — will substantially cut greenhouse gas emissions, air pollutants, and reliance on fossil fuels. These actions support SDG 7 (Affordable and Clean Energy) and SDG 13 (Climate Action) by advancing zero-emission transport in Norway's dairy supply chain.

Eligible Criteria and Description	<i>Light and heavy vehicles</i>
	<i>Light and heavy vehicles powered by electricity, hydrogen or biogas (such as KUKRAFT – cow power), as well as associated infrastructure including electrical charging points and hydrogen or biogas fuel stations</i>
DNV Findings	Replacing diesel trucks with battery-electric, hydrogen, and biogas vehicles aligns TINE's operations with Norway's climate strategy. With the Norwegian power grid nearly 100% renewable, electric trucks deliver near-zero operational emissions, directly cutting CO₂, NO_x, and particulate matter. Hydrogen trucks, such as the newly introduced MAN hTGX, are now entering Norwegian fleets, with 100 units expected in 2025 — offering 450–500 km range and 10–12 minute refuelling. Biogas-powered trucks—running on locally produced biogas from dairy manure — further enhance circularity and reduce methane emissions from organic waste.² Battery-electric trucks have been steadily gaining traction: over 370 heavy EV trucks (≥12 t) were registered in 2024³. Norway has set an ambitious goal for all new trucks to be either zero-emission or biogas-powered by 2030. Progress is happening, but it's gradual. The pace of adoption is influenced by how quickly manufacturers can deliver vehicles and how fast infrastructure can scale. There has been some movement — support for electric trucks is increasing, and plans are underway to expand fast-charging and hydrogen refuelling networks. However, the rollout is still in early stages, and broader uptake will take time. Developing charging and fuelling infrastructure is essential to enable fleet decarbonization at scale. The establishment of fast-charging stations and hydrogen/biogas refuelling nodes ensures practical deployment. This infrastructure addresses range anxiety and operational reliability, supporting Norway's ambition to fully electrify or biogas-fuel heavy transport by 2030. The shift to zero-emission trucking reduces diesel use, CO₂, NO_x, and particulate pollution — especially in rural and urban areas. Electric trucks offer immediate emissions benefits, while hydrogen vehicles extend range and operational flexibility. Biogas-powered trucks enhance resource efficiency and methane emissions control. Ongoing growth in vehicle availability and policy support reinforces TINE's ability to decarbonize logistics in a practical, scalable way. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.

² [MAN leverer 100 hydrogenlastebiler til Norge i 2025](#)

³ [Slår alarm om satsingen på elektriske nyttekjøretøy - Norsk elbilforening](#)

Eligible Green Project Categories

Sustainable Water and Wastewater Management



Investments in sustainable water and wastewater management deliver environmental benefits by reducing water consumption, improving treatment efficiency, and minimising discharges to natural ecosystems. These projects contribute to SDG 6 (Clean Water and Sanitation) and SDG 12 (Responsible Consumption and Production) by promoting resource efficiency and circularity in food production.

Eligible Criteria and Description	Wastewater facilities <i>Projects must meet at least one of the following conditions:</i> a) <i>Compliance with Best Available Techniques (BAT)</i> <i>Demonstrate adherence to BAT requirements as defined by relevant environmental standards and regulatory frameworks.</i> b) <i>Upgrade of Existing Facilities</i> <i>Deliver a material improvement in wastewater treatment or rinsing processes, aimed at reducing water consumption, energy use, and/or discharges into water. This may include measures such as:</i> • <i>Installation or modernization of rinsing equipment.</i> • <i>Enhancements that enable sludge utilization for biogas production.</i> • <i>Upgrades that improve operational efficiency or environmental performance beyond current practice</i>
DNV Findings	Adhering to BAT standards ensures that wastewater treatment and rinsing processes meet the highest environmental performance benchmarks. This reduces pollutant loads, improves emission quality, and safeguards aquatic ecosystems. For Norway, where water quality regulations are stringent and tied to EU directives, BAT compliance strengthens alignment with national environmental goals and reinforces TINE's leadership in sustainable dairy processing. While BAT implementation can require significant investment in advanced technologies, it is realistic for TINE given its scale and commitment to sustainability. Modernising rinsing systems and treatment facilities reduces water consumption and energy use, while lowering chemical discharge. Enhancements that enable sludge utilization for biogas production create a circular loop — turning waste into renewable energy and reducing methane emissions. These upgrades also improve operational efficiency, reducing costs and environmental risks. In Norway, where freshwater resources are abundant, but climate change is increasing pressure on ecosystems, such measures help maintain long-term water security and biodiversity. Achieving BAT compliance and significant upgrades is technically feasible but requires capital investment and integration with existing systems. Norway's strong regulatory framework and available incentives (e.g., Enova programs) make these improvements realistic for large operators like TINE. The main challenges lie in balancing operational continuity during retrofits and ensuring cost efficiency. However, these challenges present opportunities for innovation and industry leadership in sustainable water management. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.

Eligible Green Project Categories

Circular Economy Adapted Products, Production Technologies and Processes



Projects under this category aim to reduce resource use, minimize waste, and promote circularity across TINE's value chain. These initiatives contribute to **SDG 12 (Responsible Consumption and Production)** by reducing food loss and packaging waste.

Eligible Criteria and Description	Packaging <i>Packaging machinery and equipment needed to optimise the use of resources, use renewable or recycle materials, and adapt packaging for recycling, where one of the following can be proven:</i> a) <i>Reduction in food loss, food waste and/or material use with 30%;</i> b) <i>Packaging is 100% recyclable or; the raw material is 100% renewable and/or recycled.</i>
DNV Findings	Investments in packaging machinery and equipment that enable resource optimization, use of renewable or recycled materials, and design for recyclability deliver significant environmental benefits. By reducing material use by at least 30% or ensuring packaging is 100% recyclable or made from renewable/recycled raw materials, these measures cut the carbon footprint of packaging production and disposal. In Norway, where Extended Producer Responsibility and EU packaging directives are tightening, such initiatives help TINE stay ahead of regulatory requirements while reducing plastic waste entering ecosystems. They also support Norway's circular economy goals and consumer expectations for sustainable packaging. From an industry perspective, achieving full recyclability and integrating recycled content is realistic but requires investment in advanced packaging lines and collaboration with suppliers. TINE's sustainability strategy already targets 100% recyclable packaging and 10% recycled plastic by 2030, positioning these projects as essential steps toward compliance and leadership. Challenges include ensuring food safety and maintaining shelf-life performance with new materials, but these are being addressed through innovation and partnerships, making the transition feasible and impactful. For example, TINE's introduction of tethered caps on beverage products ensures compliance with the EU Single-Use Plastics Directive, while removable paper sidewalls on yoghurt packs could cut plastic use by 300 tonnes annually, provided proper sorting at home. Fjordland's new Bygglunsj container is fully recyclable and uses 12% less plastic, reducing plastic by 9.5 tonnes per year. These measures lower the carbon footprint of packaging production and disposal, reduce marine litter risk, and align with Norway's circular economy goals. Furthermore, TINE's commitment to the Green Dot Norway Plastic Pledge and participation in projects like Re3-Plastic demonstrate readiness to meet these challenges. While ensuring food safety and shelf-life performance with new materials remains complex, ongoing innovation and partnerships make these goals attainable.⁴

⁴ [TINE Årsrapport 2024.pdf](#)

	DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.
Eligible Criteria and Description	Raw material and food waste <i>Machinery equipment, measures and tooling related to tackling food waste in the production line and/or value chain, which leads to a reduction of food waste of at least 15% compared to pre-investment situation</i>
DNV Findings	Reducing food waste by at least 15% through improved production technologies and tooling has a direct climate benefit, as food waste accounts for 8–10% of global greenhouse gas emissions.⁵ For TINE, minimising waste in dairy processing reduces methane emissions from decomposing organic matter and optimizes resource efficiency across the value chain. In Norway, where national targets aim for a 50% reduction in food waste by 2030⁶, these measures align with both policy and consumer expectations. TINE’s initiatives in 2024 illustrate this potential: optimising cream tanks at Jæren redirected 150,000 litres of cream from animal feed to resale products, while bypass solutions at Frya saved 200,000 litres of milk and 160,000 litres of yoghurt mix. Extending product shelf life through improved packaging design and double-sided date stamping further reduces retail waste.⁴ Industry-wide, implementing advanced monitoring systems, precision dosing, and process automation to prevent overproduction and spillage is increasingly common and realistic for large-scale operators like TINE. Additionally, converting unavoidable residues into biogas or animal feed creates a circular loop, reducing landfill disposal and fossil fuel dependency. While achieving consistent reductions across all plants requires operational discipline and investment, TINE’s existing initiatives — such as digitalization of supply chains and partnerships under the Norwegian food waste agreement — demonstrate that these goals are attainable and scalable. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.

⁵[Food loss and waste account for 8-10% of annual global greenhouse gas emissions; cost USD 1 trillion annually | UNFCCC](#)

⁶[Industry agreement on food waste. | UNEP Law and Environment Assistance Platform](#)

Eligible Green Project Categories

Environmentally Sustainable Management of Living Natural Resources and Land Use



Projects under this category aim to reduce the environmental impact of dairy farming through improved practices, technology, and research. These initiatives contribute to **SDG 13 (Climate Action)** by reducing greenhouse gas emissions.

Eligible Criteria and Description	<i>Sustainability on the farm</i> <i>Measures, processes, and techniques that support sustainability on the farm leading to a reduction of the overall environmental impact. Such investments can be related to carrying out the Climate- Calculator for all TINEs farmers, which will be an important tool in how milk production can be altered to reduce greenhouse gas emissions.</i>
DNV Findings	Implementing measures such as the Climate Calculator for all TINE farmers provides a data-driven approach to reducing emissions from milk production. By quantifying carbon footprints and identifying hotspots, farmers can adopt targeted actions like optimized feed strategies, improved manure handling, and energy-efficient operations. These measures reduce methane and nitrous oxide emissions, which are the largest contributors to dairy's climate impact. In Norway, where dairy farming is integral to rural livelihoods and cultural landscapes, such initiatives help balance food security with climate responsibility. In 2024, 77% of cow's milk producers supplying TINE had signed up for the Climate Calculator, enabling precise measurement and targeted action plans. Additionally, 662 dairy producers developed climate action plans in 2024, up from 551 in 2023, supported by TINE and the Norwegian Agricultural Advisory Service.⁴ From an industry perspective, widespread adoption of climate tools is realistic but requires training and digital infrastructure. TINE's cooperative model and partnerships with agricultural advisory services make this feasible. Challenges include variability in farm size and technology readiness, but these present opportunities for innovation and knowledge-sharing across the sector. DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.
Eligible Criteria and Description	<i>Research and development related to new technologies, processes, concepts, manure management and raw materials aimed at reducing climate impact of farms, with particular focus on reducing CO₂ and methane emissions.</i>
DNV Findings	Investments in R&D for manure management, feed optimization, and low-emission technologies deliver long-term environmental benefits. Techniques such as anaerobic digestion of manure for biogas production reduce methane emissions while generating renewable energy, creating a circular system that benefits both farms and TINE's energy strategy. Research into alternative feed ingredients and precision farming can further lower emissions per litre of milk. As an example, TINE participates in major initiatives like MetanHUB, a cross-industry research project aimed at reducing methane emissions in agriculture.⁴

In the Nordic context, where climate targets are ambitious and consumer expectations for sustainable food are high, these projects position TINE as a leader in climate-smart agriculture. While scaling new technologies across thousands of farms is complex, Norway's strong agricultural policy framework and financial incentives (e.g., Enova and Innovation Norway programs) make these goals achievable. The main challenge lies in balancing cost-effectiveness with rapid implementation, but early adoption strengthens competitiveness and resilience.

DNV considers the proposed activity to be aligned with the criteria for eligible green categories under the Principles & Standards.

Exclusion Criteria

TINE's financing proceeds shall not be utilized towards the following activities:

- Fossil fuel-related operations
- Projects involving human rights violations, significant biodiversity loss, or child and forced labour
- Activities that conflict with TINE's Code of Conduct or sustainability commitments.

Schedule 2. Eligibility Assessment Protocol

1. Use of Proceeds

Ref.	Criteria	Requirements	DNV Findings
1a	Type of Bond	The Bond must fall into one of the following categories, as defined by the Principles & Standards: • Green Use of Proceeds Bond • Green Use of Proceeds Revenue Bond • Green Project Bond • Green Securitized Bond	TINE has established this Green Bond Framework to facilitate the financing and refinancing of investments that contribute to its sustainability objectives. Developed in alignment with the ICMA Green Bond Principles, the Framework defines the criteria for eligible Green Projects, outlines the process for project evaluation and selection, and sets forth the mechanisms for managing and reporting on the use of proceeds. Net proceeds from green bonds issued under this Framework will be allocated to projects undertaken by TINE SA or its subsidiaries that meet the eligibility requirements. Financing may be structured through internal loans or equity participations, provided that at least 90% of the revenues of the investee entity are derived from eligible activities. TINE has confirmed that the remaining (maximum of 10%) will not be associated with activities excluded under the Framework, ensuring consistency with its sustainability commitments. DNV notes that, given TINE's business model and sustainability strategy, the risk of exposure to high-risk or excluded sectors is considered low. The reviewed evidence confirms that the Green Financing Instruments meet the criteria under the Principles, and DNV confirms this process to be well aligned with the Principles.
1b	Green Project Categories	The cornerstones of Green Bonds are the utilization of the proceeds of the bonds which should be appropriately described in the legal documentation for the security.	Eligible project categories stated in the Framework are as follows: • <i>Energy Efficiency</i> • <i>Renewable Energy</i> • <i>Clean Transportation</i> • <i>Sustainable Water and Wastewater Management</i> • <i>Circular Economy Adapted Products, Production technologies and Processes</i> • <i>Environmentally Sustainable Management of Living Natural Resources and Land Use</i> The above-mentioned project categories meet the Eligible Green Project Categories in the Principles. DNV confirms this to be aligned with the Principles.

1c	Environmental Benefits	All designated Green Project categories should provide clear environmentally sustainable benefits, which, where feasible, will be quantified or assessed by the Issuer.	Green Project Categories defined in the Framework contribute to the following environmental objectives: - Climate Change Mitigation - Biodiversity - Circular Economy - Sustainable Use and Protection of Water The Eligible Green Project Categories defined in TINE's Green Bond Framework are expected to deliver tangible environmental benefits across multiple dimensions. Investments in energy-efficient production contribute to reduced greenhouse gas emissions and lower energy consumption, supporting Tine's climate targets. Renewable energy installations, including solar and biogas systems, help decarbonize operations and promote local energy resilience. Sustainable water and wastewater management projects improve resource efficiency and reduce environmental discharge, while circular packaging and food waste reduction initiatives support a more sustainable use of materials and help mitigate climate impacts. On-farm sustainability measures, including climate calculations and improved feed sourcing, enhance soil health, biodiversity, and animal welfare. Collectively, these categories reflect TINE's commitment to responsible production, climate-smart agriculture, and the preservation of nature. The environmental benefits of each of the Eligible Green Project Categories are further outlined in Schedule 1 of this Opinion. DNV's assessment concludes that environmental benefits are clear, precise, relevant, measurable and will be quantified for the eligible categories in the reporting.
1d	Refinancing Share	In the event that a proportion of the proceeds may be used for refinancing, it is recommended that issuers provide an estimate of the share of financing vs. re-financing, and where appropriate, also clarify which investments or project portfolios may be refinanced.	TINE has confirmed that a portion of the net proceeds from green bond issuances may be allocated to the refinancing of existing investments that meet the eligibility criteria outlined in the Framework. In line with ICMA Green Bond Principles, TINE will provide an estimate of the share of proceeds allocated to new financing versus refinancing in its annual Green Bond Report. For refinanced projects, a look-back period of up to 36 months will be applied. This approach ensures transparency and enables stakeholders to assess the environmental impact of both new and existing investments supported by proceeds. The proposed management of net proceeds from the Green Finance Instruments is confirmed by DNV to be expected to meet the criteria under the Principles.

2. Process for Project Selection and Evaluation

Ref.	Criteria	Requirements	DNV Findings
2a	Investment-Decision Process	The Issuer of a Green Bond should outline the decision-making process it follows to determine the eligibility of projects using GFIs proceeds. This includes, without limitation: • The environmental objectives of the eligible Green Projects; • The process by which the issuer determines how the projects fit within the eligible Green Projects categories; and; • Complementary information on processes by which the issuer identifies and manages perceived environmental and social risks associated with the relevant project(s).	TINE has established a robust and transparent governance structure to determine the eligibility of projects for green financing through Green Bond proceeds. This process is designed to ensure alignment with environmental objectives, adherence to defined eligibility criteria, and effective management of environmental and social risks. Eligible Green Projects are selected based on their alignment with TINE's overarching sustainability objectives and are aligned with the company's ethical guidelines and sustainability goals. These projects are expected to contribute positively to environmental outcomes, such as reducing greenhouse gas emissions, enhancing resource efficiency, and promoting sustainable agricultural practices. Each project must document a completed assessment of environmental and social risks, in accordance with TINE's internal risk management procedures. The integration of sustainability into investment decisions reflects TINE's commitment to ethical conduct and long-term environmental stewardship. Projects proposed for green financing are identified and prepared for evaluation by TINE's Investment Committee. This committee is chaired by the Chief Financial Officer and includes senior representatives from across the organization, including a dedicated representative from the Sustainability department. The committee evaluates each project against the eligibility criteria outlined in TINE's Green Financing Framework, as well as internal policies and guidelines, ensuring that all projects are evaluated for compliance with both ethical and sustainability standards. The committee retains the authority to exclude any previously approved project if it no longer meets the eligibility criteria. DNV confirms this process for project selection and evaluation to be well aligned with the Principles.
2b	Issuer's Environmental and Governance Framework	Issuers are also encouraged to: • Position the relevant information within the context of the issuer's overarching objectives, strategy, policy and/or processes relating to environmental sustainability.	TINE's approach to green financing is firmly embedded within its broader sustainability strategy, policies, and governance framework. The Framework enables the financing and refinancing of projects that contribute to Climate Change Mitigation, Biodiversity, Circular Economy, Sustainable Use and Protection of Water. The Framework also outlines exclusion criteria to ensure that proceeds are not allocated to activities that conflict with TINE's ethical standards or environmental commitments.

		• Provide information, if relevant, on the alignment of projects with official or market-based taxonomies, related eligibility criteria, including if applicable, exclusion criteria. • Have a process in place to identify mitigants to known material risks of negative environmental and/or social impacts from the relevant project(s).	<i>TINE's financing proceeds shall not be utilized towards the following activities:</i> • <i>Fossil fuel-related operations</i> • <i>Projects involving human rights violations, significant biodiversity loss, or child and forced labour</i> • <i>Activities that conflict with TINE's Code of Conduct or sustainability commitments.</i> TINE's "Ethical Trading Guidelines" outlines its sustainable business practices to mitigate risk, and sets expectations across a range of social issues, including wages, discrimination, forced labour and collective bargaining. The guidelines also cover environmental risk, stating that measures to reduce GHG emissions and pollution should be implemented, along with measures to conserve biodiversity, ensure sustainable resource extraction and manage water, oceans, forests and land. DNV confirms that TINE's environmental, social and governance strategies and grouping of projects with eligibility criteria, are well aligned with the Principles.
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3. Management of Proceeds

Ref.	Criteria	Requirements	DNV Findings
3a	Tracking Procedure	The net proceeds of GFIs should be credited to a sub-account, moved to a sub- portfolio or otherwise tracked by the Issuer in an appropriate manner and attested to by a formal internal process that will be linked to the Issuer's lending and investment operations for Green Projects.	DNV can confirm that TINE has a transparent process in place to manage the net proceeds from its Green Finance Instruments. TINE ensures that the net proceeds from GFIs are appropriately tracked through a dedicated internal register, referred to as the "Green Register." This register is used to monitor and verify that an amount equivalent to the net proceeds is allocated exclusively to projects that meet the eligibility criteria defined in TINE's Green Financing Framework. The tracking process is governed by a formal internal procedure and is directly linked to TINE's lending and investment operations for Green Projects. The Investment Committee, chaired by the Chief Financial Officer and comprising senior representatives including from the Sustainability department, is responsible for evaluating and approving projects in accordance with the framework and internal policies. DNV confirms that the Framework outlines processes to track proceeds and allocations to the nominated projects, which are well aligned with the Principles.
3b	Tracking Procedure	So long as the Green Bonds are outstanding, the balance of the tracked proceeds should be periodically reduced by amounts matching eligible green investments or disbursements made during that period.	TINE maintains a continuous oversight of the allocation of proceeds through the Green Register. As long as Green Bonds or Loans remain outstanding, the balance of tracked proceeds is periodically adjusted to reflect disbursements made to eligible Green Projects. In the event that a project is sold or otherwise ceases to meet the eligibility criteria, the associated funds are reallocated in accordance with the procedures outlined under the "Management of Proceeds". The Investment Committee retains the authority to exclude any previously approved project that no longer complies with the framework, thereby ensuring the integrity of the allocation process. DNV confirms that the Framework outlines processes to track proceeds and allocations to the nominated projects, which are aligned with the Principles.
3c	Temporary Holdings	Pending such investments or disbursements to eligible Green Projects, the Issuer should make known to investors the intended types of temporary	Should there be a temporary surplus of net proceeds—where the total outstanding proceeds exceed the value of eligible Green Projects—TINE will hold the unallocated balance in its liquidity reserve.

		investment instruments for the balance of unallocated proceeds.	These funds will be managed in accordance with TINE's financial guidelines and liquidity policy, and may be temporarily invested in bank deposits or low-risk money market instruments. Under no circumstances will these funds be allocated to activities that conflict with the exclusion criteria defined in the Green Financing Framework. TINE is committed to transparency and will ensure that the nature of such temporary investments is clearly communicated to investors. DNV confirms that the Framework outlines instruments to which unallocated proceeds will be invested, that are well aligned with the Principles.
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4. Reporting

Ref.	Criteria	Requirements	DNV Findings
4a	Periodical Reporting	- Issuers should make, and keep, readily available up to date information on the use of proceeds to be renewed annually until full allocation, and on a timely basis in case of material developments. - The annual report should include a list of the projects to which GFIs proceeds have been allocated, as well as a brief description of the projects, the amounts allocated, and their expected impact. - Where confidentiality agreements, competitive considerations, or a large number of underlying projects limit the amount of detail that can be made available, the GBP recommend that information is presented in generic terms or on an aggregated portfolio basis (e.g. percentage allocated to certain project categories).	TINE has committed to annually publishing a Green Bond Report for as long as there are outstanding proceeds from the issued GFIs. Additionally, the company will publish timely updates in case of any material changes or significant developments. The Green Bond Report will consist of an Allocation report and an Impact report. The Allocation Reporting will include the following information: - A list of projects financed, including project descriptions and allocated amount on project level and project category level - Distribution between new financing and refinancing, - The amount of unallocated proceeds, if any. The Impact Report will report on the relevant metrics for each of the Green Project Categories. Reporting will be on a 'best effort basis', with TINE stating that all data related to the metrics may not be available. DNV is of opinion that the metrics used to assess project impacts are well defined and aligned with the Framework's overall objectives, ensuring transparency and accountability for investors. DNV confirms that the proposed reporting is consistent with the criteria set out in the Principles.



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