Norinchukin Bank

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Introduction

The Norinchukin Bank ("Nochu") issued green bonds between September 2021 and October 2024 (collectively the "Green Bonds")[1] amounting to USD 2,500 million to finance or refinance projects that are expected to provide positive impacts. In June 2025, Nochu engaged Sustainalytics to review the projects financed with proceeds from the green bonds (the "Nominated Expenditures") and provide an assessment as to whether they meet the use of proceeds criteria and whether Nochu complied with the reporting commitments in the Norinchukin Bank Sustainable Bond Framework.[2] Sustainalytics provided a Second-Party Opinion on the Framework in February 2024.[3] This is Sustainalytics' fourth annual review of allocation and reporting of the instruments issued under the Framework, following a previous review in June 2022, June 2023 and September 2024.[4, 5,6]

Evaluation Criteria

Sustainalytics evaluated the Nominated Expenditures and Nochu's reporting based on whether they:

1. Meet the use of proceeds and eligibility criteria defined in the Framework; and
2. Reported on at least one key performance indicator (KPI) for each use of proceeds category defined in the Framework.

Table 1: Use of Proceeds Categories, Eligibility Criteria and Associated KPIs

Use of Proceeds Category	Eligibility Criteria	Key Performance Indicators
Renewable Energy	Funds to finance or refinance renewable energy projects (including construction, maintenance and/or operation of power generation and/or transmission) a. Solar, solar thermal, wind (onshore and offshore), geothermal power assets (with the emission threshold of 100g of CO_2 per kwh or less) b. Biomass power plant using virgin wood (chips and pellets) from the forestry with a suitable certification on resource conservation and management (with	▪ Distribution by sub-sector and location ▪ Annual power generation ▪ Subject to confidentiality and clients' prior consent, high-level description of select projects ▪ Where feasible, quantitative assessment of expected positive environmental impacts on an aggregate basis (example KPI:

[1] Green Bonds includes a USD 500 million five-year green bond and a USD 500 million ten-year green bond issued in September 2021 (together, the "2021 Green Bonds"); a USD 500 million five-year green bond in September 2022 (the "2022 Green Bond"); a USD 500 million five-year green bond issued in March 2023 (the "2023 Green Bond"); and an USD 500 million five-year green bond issued in October 2024 (the "2024 Green Bond").
[2] Nochu, "Norinchukin Sustainable Bond Framework", at: https://www.nochubank.or.jp/en/ir/fixed_income_information/green_bond_information/pdf/Sustainable_Bond_Framework.pdf
[3] Sustainalytics, "Second-Party Opinion, Norinchukin Bank Sustainable Bond Framework ", (2023), at: https://www.nochubank.or.jp/en/ir/fixed_income_information/green_bond_information/pdf/Sustainable_Bond_Framework_Second-Party_Opinion.pdf
[4] Sustainalytics, "Annual Review, Norinchukin Bank", (2022), at: https://www.sustainalytics.com/corporate-solutions/sustainable-finance-and-lending/published-projects/project/the-norinchukin-bank/the-norinchukin-bank-green-bond-2021-annual-review-(2022)/the-norinchukin-bank-green-bond-2021-annual-review-(2022)
[5] Sustainalytics, "Annual Review, Norinchukin Bank", (2023), at: https://www.sustainalytics.com/corporate-solutions/sustainable-finance-and-lending/published-projects/project/the-norinchukin-bank/the-norinchukin-bank-green-bonds-2021--green-bond-2022-and-green-bond-2023-annual-review-(2023)/the-norinchukin-bank-green-bonds-2021--green-bond-2022-and-green-bond-2023-annual-review-(2023)
[6] Sustainalytics, "Annual Review, Norinchukin Bank", (2024), at: https://www.nochubank.or.jp/en/ir/fixed_income_information/green_bond_information/pdf/Sustainalytics_Annual_Review-2024.pdf

	the emission threshold of 100g of CO_2 per kwh or less) c. Green hydrogen and/or green ammonia production facilities (with the emission threshold of below 3 tCO_2e/tH_2) d. Transmission and distribution of renewable energy (including power lines and related infrastructure such as substations) on the condition that more than 67% of newly enabled generation capacity in the system is below the generation threshold value of 100 gCO_2e/kWh measured on a life cycle basis in accordance with electricity generation criteria, over a rolling five-year period	estimated CO_2 emission avoidance)
Green Building	Funds to finance or refinance real estate properties [including those owned by Japanese Real Estate Investment Trusts (JREITs)], which have earned or are expected to earn one of the following: a. Gold or Platinum rating under LEED b. Excellent or Outstanding rating under BREEAM c. A or S rating under CASBEE d. 4 or 5 stars under DBJ Green Building Certification	▪ Certification vintage ▪ Subject to confidentiality and clients' prior consent, high-level description of select projects ▪ Where feasible, quantitative assessment of expected positive environmental impacts on an aggregate basis (example KPI: estimated CO_2 emission avoidance)

Issuer's Responsibility

Nochu is responsible for providing accurate information and documentation relating to the details of the projects, including descriptions, amounts allocated and impact.

Independence and Quality Control

Sustainalytics, a leading provider of ESG research and ratings, conducted the verification of the use of proceeds from Nochu's green bonds. The work undertaken as part of this engagement included collection of documentation from Nochu and review of said documentation to assess conformance with the Framework.

Sustainalytics relied on the information and facts presented by Nochu. Sustainalytics is not responsible nor shall it be held liable for any inaccuracies in the opinions, findings or conclusions herein due to incorrect or incomplete data provided by Nochu.

Sustainalytics made all efforts to ensure the highest quality and rigor during its assessment process and enlisted its Sustainability Bonds Review Committee to provide oversight of the review.

Conclusion

Based on the limited assurance procedures conducted,[7] nothing has come to Sustainalytics' attention that causes us to believe that, in all material respects, the Nominated Expenditures do not conform with the use of proceeds criteria and reporting commitments in the Framework. Nochu has disclosed to Sustainalytics that the proceeds from the green bonds were fully allocated as of 31 March 2025.

[7] Sustainalytics' limited assurance process includes reviewing documentation relating to details of projects, as provided by the issuing entity, which is responsible for providing accurate information. These may include descriptions of projects, estimated and realized costs, and reported impact. Sustainalytics has not conducted on-site visits to projects.

Detailed Findings

Table 2: Detailed Findings

Framework Requirements	Procedure Performed	Factual Findings	Error or Exceptions Identified
Use of Proceeds Criteria	Verification of projects to determine alignment with the use of proceeds criteria outlined in the Framework.	The Nominated Expenditures comply with the use of proceeds criteria.	None
Reporting Criteria	Verification of projects or assets to determine if impact was reported in line with the KPIs outlined in the Framework.	Nochu reported on at least one KPI per use of proceeds category.	None

Appendices

Appendix 1: Allocation Reporting

Table 3: Allocation of proceeds from the 2021 green bond (USD 500 million, five-year)

Use of Proceeds Category	Sub-Category	Number of projects	Country	Amount Allocated (USD million)
Renewable Energy	Offshore Wind	2	UK	229
	Offshore Wind	2	Germany	56
	Onshore Wind	1	Canada	37
	Solar	5	Japan	142
Green Building	Office	1	Japan	19
	Office	1	Japan	17
Total Allocated Amount				500
Total Unallocated Amount				0
Total Net Proceeds Raised				500

Table 4: Allocation of proceeds from the 2021 green bond (USD 500 million, ten-year)

Use of Proceeds Category	Sub-Category	Number of projects	Country	Amount Allocated (USD million)
Renewable Energy	Offshore Wind	2	UK	341
	Solar	4	Japan	159
Total Allocated Amount				500
Total Unallocated Amount				0
Total Net Proceeds Raised				500

Table 5: Allocation of proceeds from the 2022 green bond (USD 500 million, five-year)

Use of Proceeds Category	Sub-Category	Number of projects	Country	Amount Allocated (USD million)
Renewable Energy	Offshore Wind	3	UK	458
	Solar	1	Japan	42
Total Allocated Amount				500
Total Unallocated Amount				0
Total Net Proceeds Raised				500

Table 6: Allocation of proceeds from the 2023 green bond (USD 500 million, five-year)

Use of Proceeds Category	Sub-Category	Number of projects	Country	Amount Allocated (USD million)
Renewable Energy	Offshore Wind	1	US	173
	Offshore Wind	1	UK	148
	Onshore Wind	1	Canada	78
	Solar	1	Japan	77
	Solar	1	US	24
Total Allocated Amount				500
Total Unallocated Amount				0
Total Net Proceeds Raised				500

Table 7: Allocation of proceeds from the 2024 green bond (USD 500 million, five-year)

Use of Proceeds Category	Sub-Category	Number of projects	Country	Amount Allocated (USD million)
Renewable Energy	Offshore Wind	1	UK	216
	Solar	1	Saudi Arabia	67
	Solar	1	US	44
	Solar	1	Japan	173
Total Allocated Amount				500
Total Unallocated Amount				0
Total Net Proceeds Raised				500

Appendix 2: Reported impact [8]

Table 8: Reported impact from the 2021 green bond (USD 500 million, five-year)

Use of Proceeds Category	Sub-Category	Number of projects	Country	Certification	CO_2 Emissions Reduction (Nochu's Contribution) (tCO_2/year)
Renewable Energy	Offshore Wind	2	UK	N.A.	58,099
	Offshore Wind	2	Germany	N.A.	42,243
	Onshore Wind	1	Canada	N.A.	19,330
	Solar	5	Japan	N.A.	44,922
Green Building	Office	1	Japan	CASBEES	243
	Office	1	Japan	DBJ 5 Stars	31
Total					164,869

Table 9: Reported impact from the 2021 green bonds (USD 500 million, ten-year)

Use of Proceeds Category	Sub-Category	Number of projects	Country	CO_2 Emissions Reduction (Nochu's Contribution) (tCO_2/year)
Renewable Energy	Offshore Wind	2	UK	46,942
	Solar	4	Japan	37,589
Total				84,531

[8] The impact for green bonds is calculated on a pro-rata basis

Table 10: Reported impact from the 2022 green bond (USD 500 million, five-year)

Use of Proceeds Category	Sub-Category	Number of projects	Country	CO_2 Emissions Reduction (Nochu's Contribution) (tCO_2/year)
Renewable Energy	Offshore Wind	3	UK	235,959
	Solar	1	Japan	9,388
Total				245,347

Table 11: Reported impact from the 2023 green bond (USD 500 million, five-year)

Use of Proceeds Category	Sub-Category	Number of projects	Country	CO_2 Emissions Reduction (Nochu's Contribution) (tCO_2/year)
Renewable Energy	Offshore Wind	1	US	42,227
	Offshore Wind	1	UK	78,390
	Onshore Wind	1	Canada	30,710
	Solar	1	Japan	18,217
	Solar	1	US	7,613
Total Allocated Amount				177,156

Table 12: Reported impact from the 2024 green bond (USD 500 million, five-year)

Use of Proceeds Category	Sub-Category	Number of projects	Country	CO_2 Emissions Reduction (Nochu's Contribution) (tCO_2/year)
Renewable Energy	Offshore Wind	1	UK	126,058
	Solar	1	Saudi Arabia	17,027
	Solar	1	US	16,973
	Solar	1	Japan	45,265
Total				205,323

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