European Green Bond Post-Issuance Review

Kingdom of Denmark European Green Bond Allocation Report 2025

Sept. 25, 2026

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Alignment Summary

Aligned = ✓ Not aligned = ✗

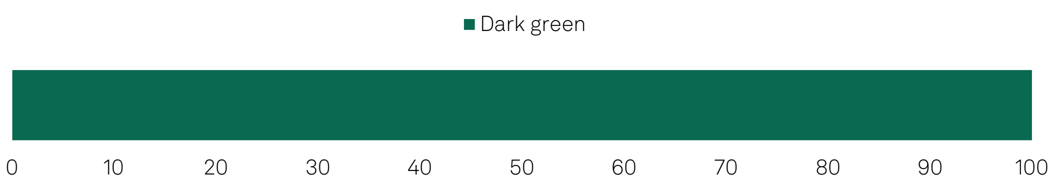
✓ European Green Bond Regulation (EuGBR): Allocation Report Review

Allocation Summary

As of Dec. 31, 2025, allocations consist primarily of financing provided to the state-owned enterprise Energinet (transmission infrastructure) and subsidies to support renewable energy technologies and the restoration of wetlands, as well as investments in railway infrastructure.

We consider the issuer's investments to support Denmark's electricity grid, renewable energy build-out, the conversion of low-lying agricultural lands, and rail infrastructure to be Dark green.

Environmental: Allocations to projects as of Dec. 31, 2025 (% of allocation per shade)



Reporting Quality Assessment (jump to section)

✓ The report meets the requirements for allocation reporting contained in the Green Bond Principles, ICMA, 2025.

Strengths

Financed projects support Denmark's economy-wide decarbonization pathway. Eligible green expenditure aligns with Denmark's national climate policy framework, including a target to reduce greenhouse gas emissions by 70% by 2030. By financing a diverse range of eligible activities--such as renewable generation, grid transmission, clean transport, and land-use management--European Green Bond (EuGB) proceeds support a holistic transition across the entire Danish economy.

Areas to watch

The actual allocation of 2025 proceeds showed a higher concentration in renewable energy, specifically transmission infrastructure, than initially projected. This was primarily due to the fact that initial EuGB issuance covered only a portion of the total eligible expenditure pool and followed a strict prioritization framework.

A significant portion of these funds is directed to Energinet through an on-lending structure. However, the integrity of this allocation is secured by the Danish parliament through legally mandated appropriation accounts, ensuring funds remain tied to their designated green objectives in compliance with EuGBR standards.

Issuer Description

Location: Denmark	**Sector:** Sovereign

The Kingdom of Denmark is a country in Northern Europe, comprising the Jutland peninsula and an archipelago of islands, with a surface area of about 43,094 square kilometers and a population of roughly 6 million. It is a high-income economy and has a very high human development index (about 0.96). It published a European Green Bond Factsheet in September 2025 and its first EU Green Bond Allocation Report on Sept. 25, 2026.

European Green Bond (EuGB) Regulation Alignment Assessment Summary

Alignment opinion	EuGB alignment assessment
✓	**Article 4: Use of the proceeds of EuGBs**

Article 4 summary table		Technical screening criteria (TSC)			
Economic activity	**Allocation since issuance**	**Substantial contribution**	**Do no significant harm**	**Minimum safeguards (Issuer level)**	**Overall alignment**
2.1: Restoration of wetlands	6%	✓	✓	✓	✓
4.1: Electricity generation using solar photovoltaic technology – D35.11	2%	✓	✓		✓
4.3: Electricity generation from wind power – D35.11	16%	✓	✓		✓
4.9: Transmission and distribution of electricity – D35.12, D35.13	60%	✓	✓		✓
4.17: Cogeneration of heat/cool and power from solar energy - D35.11	4%	✓	✓		✓
6.14: Infrastructure for rail transport - F.42.1.2, F.42.13, H.49.1.0, H.49.2.0	13%	✓	✓		✓

Alignment opinion	EuGB alignment assessment
N.A.	**Article 5: Flexibility in the use of the proceeds of EuGBs**
✓	**Article 6: Financial assets**
N.A.	**Article 7: Capital expenditure (capex) plan**
✓	**Article 8: Application of the TSC and grandfathering**
✓	**Allocations in accordance with factsheet**

*For activities not included in the EU Taxonomy, we use our "Analytical Approach: Shades Of Green Assessments" to assess whether the activity is making a substantial contribution, without significantly harming any of the other objectives.

Aligned = ✓ Not aligned = ✗ Not covered by the technical screening criteria = — Not applicable = **N.A.**

See EuGB Post-Issuance Alignment Assessment for more detail.

Relevant European Green Bonds

Identifier	Name	Date	Maturity	Amount issued (Currency)	Amount allocated (Currency)
DK0009925182	DGB 2.25 per cent 2035 G	Sep and Oct 2025	Nov 2035	8.27 billion (DKK)	8.27 billion (DKK)

N.A.--Not applicable. Source: Kingdom of Denmark European Green Bond Allocation Report 2025, S&P Global Ratings.

European Green Bond Post-Issuance Alignment Assessment

This section provides our opinion on whether the issuer has allocated the proceeds in line with EuGBR requirements. Analytical Approach: European Green Bond External Review.

Alignment Summary

Aligned = ✓ Not aligned = ✗

✓ European Green Bond Regulation (EuGBR): Allocation Report Review

Alignment Assessment

Aligned = ✓ Not aligned = ✗ Not applicable = **N.A.**

✓ Article 4: Use of the proceeds of EuGBs

The Kingdom of Denmark has refinanced eligible green expenditure from January-December 2024, in line with the categories defined under the gradual approach of Article 4 of the EuGBR.

This includes expenditure on electricity transmission via Energinet and rail infrastructure via Femern A/S Landanlæg and Banedanmark, as well as renewable energy (subsidies for solar photovoltaic [PV], wind, and electricity taxation) and the environmentally sustainable management of living natural resources and land use (restoration of wetlands). These activities align with the substantial contribution criteria for the climate mitigation objective under the EU Taxonomy.

Expenditure is governed by the Danish parliament through annual appropriation accounts in the Finance Act. These accounts are legally and administratively ring-fenced, ensuring funds are used only for the specific EU Taxonomy-aligned activities and conditions prescribed for each account.

EU Taxonomy alignment analysis

Aligned = ✓ Not aligned = ✗

2.1 Restoration of wetlands – NACE code: NA

Allocations of DKK 476 million were assigned to the restoration of wetlands, representing 5.8% of total proceeds. This allocation supports a national subsidy program in Denmark focused on the conversion of low-lying agricultural lands to reduce greenhouse gas emissions. Under the 2024 "Implementation of a Green Denmark" agreement, the program commits to the conversion of 140,000 hectares of carbon-rich lowland soils by 2030. The initiative involves taking carbon-rich soils out of agricultural use and rewetting the lands--primarily through the closing of drains and ditches--to restore natural hydrology.

Opinion	Key findings
Substantial contribution: Technical screening criteria assessment	
✓	We consider the financing related to the restoration of wetlands to be aligned with the technical screening criteria for a substantial contribution to the EU's climate mitigation objective. The activity facilitates significant greenhouse gas emission reductions by converting carbon-rich lowland soils from agricultural use to natural low-lying areas, thereby restoring natural hydrology and preventing the oxidation of organic matter. To ensure high impact, eligibility is restricted to projects where at least 60% of the area is composed of carbon-rich soils with a minimum of 6% organic carbon content, verified via the MiljøGIS registry. The climate benefit is quantified through mandatory pre-studies that calculate expected CO_2 emission reductions (tons of CO_2 equivalent per hectare) alongside side effects such as nitrogen and phosphorus leaching, using an analysis consistent with the 2019 Refinement to the 2006 Intergovernmental Panel on Climate Change (IPCC) Guidelines. To guarantee the permanence of these climate benefits, recipients must commit to the permanent reclassification of project areas in public registries, ensuring the land remains as grass or natural

areas with natural water levels and cannot be converted to other uses. Finally, projects are only funded that prove a cost-effectiveness of no more than DKK 8,533 per ton of CO_2 equivalents reduced, while compliance is strictly monitored by the Danish Agency for Green Transition and Aquatic Environment and the Danish Nature Agency.

Do no significant harm (DNSH): Technical screening criteria assessment

✓

According to the EU Taxonomy, this activity must not harm climate change adaptation, the sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention, or the protection and restoration of biodiversity and ecosystems. We consider the issuer's activity to be aligned with the DNSH technical screening criteria for all applicable objectives (please see the generic DNSH table for the analysis of the DNSH criteria on climate adaptation).

- For DNSH to water and marine resources: The issuer ensures that financed projects related to wetland restoration do not adversely affect water quality or availability. Project pre-studies are mandatory to assess consequences for water levels and drainage conditions, and must include detailed drainage maps. Furthermore, funding criteria specifically incorporate assessments of the project's potential impact on the aquatic environment, waterways, and drinking water to ensure the maintenance of good water status.
- For DNSH to the transition to a circular economy: The issuer ensures the preservation of natural resources and soil integrity by prohibiting peat extraction and soil cultivation, such as ploughing, within the project areas. While the land may not be used for growing crops, the framework permits the sustainable harvesting of biomass grown on the land surface or similar activities such as grazing.
- For DNSH to pollution prevention: The issuer confirms that strict prohibitions are implemented in Denmark to prevent soil and water pollution. Within the project areas, the use of pesticides, insecticides, fungicides, and soil improvers (such as lime) is strictly prohibited. Additionally, the use of fertilizers is banned, with the sole exception of manure left on-site by grazing livestock. To proactively manage environmental risks, the potential for nitrogen and phosphorus leaching into the aquatic environment during the re-wetting process is assessed prior to project initiation.
- For DNSH to biodiversity: The activity is designed to enhance biodiversity through the permanent reclassification of agricultural land into wetlands, ensuring these areas remain as grass-dominated or natural habitats with natural hydrology. Selection criteria prioritize projects that offer a positive contribution to Natura 2000 sites, Annex IV species, and the establishment of habitat buffers or corridors for Red List species. To maintain ecological integrity, the planting of any plant species, whether invasive or not, is prohibited within the project area.

4.1: Electricity generation using solar photovoltaic (PV) technology – NACE code: D35.11

Within the framework of the bond, DKK 176 million has been allocated to support solar PV systems energy systems, representing 2.1% of the total bond proceeds. The Danish government supports the expansion of solar PV capacity through targeted subsidies. This includes financial support for small-scale solar PV systems, where producers receive premiums on top of the market price to enhance competitiveness against fossil fuel-based energy.

Opinion	Key findings
Substantial contribution: Technical screening criteria assessment	
✓	We consider the financing related to the solar subsidy schemes to be aligned with the technical screening criteria for a substantial contribution to the EU's climate mitigation objective, since we see a clear link between supporting the buildout of electricity generation using solar PV technology in Denmark.

Do no significant harm (DNSH): Technical screening criteria assessment

✓

According to the EU Taxonomy, this activity must not harm EU climate adaptation, the circular economy, and biodiversity objectives. We consider the issuer's activity to be aligned with the DNSH technical screening criteria for climate adaptation and biodiversity (please see the generic DNSH table for the analysis of the DNSH criteria on climate adaptation and biodiversity).

- For DNSH to the circular economy: In our view, the activity complies with requirements regarding the durability, recyclability, and dismantlability of equipment. Denmark has implemented the EU WEEE Directive (2012/19/EU) through the Electronic Waste Executive Order, which establishes a strict manufacturer responsibility framework. Manufacturers or suppliers of solar panels in the Danish market must be registered with the Danish Producer Responsibility. Under this regulation, decommissioned solar panels must be processed such that materials corresponding to at least 80% of the original weight of the panel are recycled.

Recent data confirms the effectiveness of this framework: In 2022, 95% of the waste of decommissioned solar PV panels was successfully recycled.

4.3: Electricity generation from wind power – NACE code: D35.11

Within the framework of the bond, DKK 897 million has been allocated to offshore wind projects, DKK 327 million to onshore wind, and DKK 68 million to household wind systems, representing a combined 15.6% of the total bond proceeds. The Danish government supports the expansion of wind energy capacity through targeted subsidies for both large-scale and small-scale installations. This includes disbursements for Public Service Obligation subsidies to support offshore and onshore wind farms, as well as support for small-scale household wind turbines to increase competitiveness against fossil fuel-based energy.

Opinion	Key findings
Substantial contribution: Technical screening criteria assessment	
✓	We consider the financing related to the wind subsidy schemes to be aligned with the technical screening criteria for a substantial contribution to the EU's climate mitigation objective, since we see a clear link between supporting the buildout of electricity generation using wind power technology in Denmark. The financed activities directly facilitate the deployment of both utility-scale wind farms and small-scale wind systems, contributing to the decarbonization of the Danish electricity grid.
Do no significant harm (DNSH): Technical screening criteria assessment	
✓	According to the EU Taxonomy, this activity must not harm EU climate adaptation, circular economy, water, and biodiversity objectives. We consider the issuer's activity to be aligned with the DNSH technical screening criteria for climate adaptation and biodiversity (please see the generic DNSH table for further analysis). • For DNSH to water and marine resources: For offshore wind developments, the planning process includes a strategic environmental assessment (SEA) and an exhaustive environmental impact assessment (EIA) covering the designated area, export cable routes, and grid connections. These assessments, conducted under the Danish Act of Environmental Assessment, ensure that development consent includes specific measures to avoid, prevent, or reduce significant adverse effects on water systems and marine environments, in accordance with the EU EIA and SEA Directives. • For DNSH to the circular economy: The Danish EPA has issued guidance ensuring that wind turbines are disposed of in accordance with the waste hierarchy; notably, landfilling turbine blades is prohibited. While fiberglass and thermoset plastic components remain challenging to recycle, Danish tenders for 6 gigawatts of offshore wind development now include specific requirements for concessionaries to use recyclable turbine blades. Furthermore, projects must conduct life cycle assessments covering installation, operation, and dismantling, which are subject to independent third-party verification. This regulatory environment supports high resource recovery, with a 2023 Danish EPA mapping indicating that 85%-90% of wind turbine materials are currently recycled.

4.9: Transmission and distribution of electricity – NACE codes: D35.12, D35.13

About DKK 4.946 billion, representing 59.8% of the total bond proceeds, has been on-lent to the state-owned transmission system operator Energinet to finance national electricity transmission grid expansions and infrastructure renewal. Energinet is the monopoly electricity and gas transmission system operator in Denmark, owning and maintaining the high-voltage electricity transmission system.

Opinion	Key findings
Substantial contribution: Technical screening criteria assessment	
✓	We consider the issuer's allocation toward the transmission and distribution of electricity to be aligned with the technical screening criteria for a substantial contribution to the EU's climate mitigation objective. Energinet's activities are an integral part of the Danish transmission system, which is fully interconnected with the European energy system. We further understand that Energinet has not allocated proceeds to establish direct connections to power plants with life-cycle greenhouse gas emissions exceeding 100 grams of CO_2e per kilowatt hour.
Do no significant harm (DNSH): Technical screening criteria assessment	

✓	According to the technical screening criteria, this activity must not harm climate adaptation, the circular economy, pollution prevention, and biodiversity conservation efforts. We consider the issuer's activity of the transmission and distribution of electricity to be aligned with the DNSH technical screening criteria for all the applicable EU objectives. • For DNSH to climate adaptation: Energinet conducts comprehensive climate and vulnerability assessments in accordance with the EU Taxonomy and the European Commission's technical guidance. In 2024, Energinet completed a risk analysis involving four extreme weather scenarios (including heavy snowfall, extreme precipitation/flooding, heat waves, and nationwide storms) defined by the Danish Energy Agency. Following this assessment, the issuer confirms that Energinet has undertaken adaptation solutions to address identified physical risks and that assets have an expected lifespan exceeding 10 years. • For DNSH to the circular economy: The issuer maintains a waste management plan tailored to ensure maximum reuse and recycling in accordance with the waste hierarchy. This plan is implemented through contractual agreements with waste management partners and is reflected in official project documentation to ensure resource efficiency at the end of the asset life cycle. • For DNSH to pollution prevention: For overground high-voltage lines, activities respect applicable norms to limit the impact of electromagnetic radiation on human health. Energinet complies with the 2016 Executive Order on Exposure to Electromagnetic Fields at Work, which transposes Directive 2013/35/EU and International Commission of Non-Ionizing Radiation Protection guidelines. Moreover, the issuer confirms that construction site activities follow the principles of the International Finance Corporation's General Environmental, Health, and Safety Guidelines and that no polychlorinated biphenyls are used in current activities, and all older PCB-containing assets have been replaced. • For DNSH to biodiversity: The activity complies with biodiversity conservation requirements through mandatory EIAs. The EU EIA Directive is implemented in Denmark via the Environmental Assessment Act, which Energinet is obliged to follow. For projects located near biodiversity-sensitive areas, such as Natura 2000 sites, appropriate assessments are conducted and necessary mitigation measures are implemented. The Danish EPA serves as the approving authority, and relevant EIAs are made publicly available via official channels.

4.17: Cogeneration of heat/cool and power from solar energy – NACE code: D35.11

Within the framework of the bond, DKK 300 million has been allocated to support solar tax exemption for own consumption for the cogeneration of heat/cool and power from solar energy, representing 3.6% of the total bond proceeds.

Opinion	Key findings
Substantial contribution: Technical screening criteria assessment	
✓	We consider the tax exemption for the cogeneration of heat/cool and power from solar energy to be aligned with the technical screening criteria for a substantial contribution to the EU's climate mitigation objective, since we see a clear link with supporting the buildout of solar electricity generation in Denmark.
Do no significant harm (DNSH): Technical screening criteria assessment	
✓	According to the EU Taxonomy, this activity must not harm EU climate adaptation, the circular economy, and biodiversity objectives. We consider the issuer's activity to be aligned with the DNSH technical screening criteria for climate adaptation, biodiversity (please see the generic DNSH table for the analysis of the DNSH criteria on climate adaptation and biodiversity), and circular economy (please see the DNSH section of the 4.1 Electricity generation from solar PV). • For DNSH to the circular economy: In our view, the activity complies with requirements regarding the durability, recyclability, and dismantlability of equipment. Denmark has implemented the EU WEEE Directive (2012/19/EU) through the Electronic Waste Executive Order, which establishes a strict manufacturer responsibility framework. Manufacturers or suppliers of solar panels in the Danish market must be registered with the Danish Producer Responsibility. Under this regulation, decommissioned solar panels must be processed such that materials corresponding to at least 80% of the original weight of the panel are recycled. Recent data confirms the effectiveness of this framework: In 2022, 95% of the waste of decommissioned solar PV panels was successfully recycled.

6.14: Infrastructure for rail transport – NACE codes: F.42.1.2, F.42.13, H.49.1.0, H.49.2.0

Within the framework of the bond, DKK 1.080 billion has been allocated to clean transportation activities, representing 13.1% of total proceeds. This allocation supports rail infrastructure projects in Denmark, specifically through Femern A/S Landanlæg and Banedanmark, which manage the Danish railway infrastructure. DKK 292 million is allocated to Femern A/S Landanlæg for rail infrastructure investment projects related to the Fehmarnbelt Fixed Link, a high-priority TEN-T project governed by Act 575 of 4 May 2015. Additionally, DKK 611 million is allocated to Banedanmark, covering rail infrastructure investment (DKK 314 million), renovation and maintenance (DKK 222 million), and rail infrastructure operation (DKK 75 million).

These activities are supported by Denmark's Infrastructure Plan 2035, which aims to ensure 100% of the state's railway trackside infrastructure is either electrified or prepared for battery-operated train operations.

Opinion **Key findings**

Substantial contribution: Technical screening criteria assessment

✓

We consider the financing related to rail infrastructure operation, maintenance, renovation, and investment projects to be aligned with the technical screening criteria for a substantial contribution to the EU's climate mitigation objective. This alignment is supported by the Danish government's 2021 commitment to achieve zero-emission state-operated rail traffic by 2030, a goal facilitated by Infrastructure Plan 2035 which mandates that 100% of trackside infrastructure be either electrified or prepared for battery-operated operations. The proceeds are dedicated to these electrified subsystems and the expansion of the network through high-priority projects such as the Fehmarnbelt Fixed Link, which provides an 18 kilometers (km) electrified two-track railway that reduces the transit route between Scandinavia and mainland Europe by 160 km. Furthermore, the financed infrastructure is dedicated to the efficient transfer of passengers between modes--connecting major airports in Copenhagen and Aalborg--and the transshipment of freight at key TEN-T nodes, including the ports of Hirtshals, Frederikshavn, Aalborg, Aarhus, Esbjerg, and Copenhagen, as well as Rail-Road Terminals in Taulov, Padborg, and Høje Taastrup. The infrastructure is not dedicated to the transport or storage of fossil fuels, as confirmed by an EIA.

Do no significant harm (DNSH): Technical screening criteria assessment

✓

According to the EU Taxonomy, this activity must not harm climate change adaptation, the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention, or the protection and restoration of biodiversity and ecosystems. We consider the issuer's activity to be aligned with the DNSH technical screening criteria for all applicable objectives.

- For DNSH to climate change adaptation: Robust climate risk and vulnerability assessments have been conducted for both Banedanmark and the Fehmarnbelt Fixed Link. For the Fehmarnbelt project, which has an expected lifespan of at least 120 years, assessments were integrated into the EIA and included high-level vulnerability studies by Rambøll-Arup-TEC using IPCC scenarios. Key material risks identified include sea level rise, coastal flooding, and heavy precipitation. To mitigate these, the project incorporates structural design criteria based on a forecasted sea level rise of 1.50 meters, flood protection mounds, removable flood barriers at tunnel portals, and advanced drainage systems. For Banedanmark, the scenario utilizes the RCP8.5 projection scenario to ensure the robustness of its critical infrastructure. Several physical risk categories have been considered material, including heat stress, storms, sea level rises, coastal erosion, and others. For each specific location, a vulnerability assessment is undertaken, and appropriate climate factors and projections are included in the design of new activities. All adaptation solutions are screened under Danish law to assess potential cascade effects and ensure the continued functionality and safety of the railway network.
- For DNSH to the sustainable use and protection of water and marine resources: The issuer complies with Directive 2000/60/EC to ensure good water status and ecological potential. For the Fehmarnbelt project, a comprehensive EIA was conducted to address environmental degradation risks, including drainage impacts on water quality. For Banedanmark, the infrastructure includes approximately 1,200 km of water-bearing ditches that support local flora and fauna.
- For DNSH to the transition to a circular economy: Financed projects demonstrate high rates of material recovery. Banedanmark recycles 99.3% of its total waste volumes as of 2023, with only 0.18% sent to landfills. For the Fehmarnbelt Fixed Link, more than 86% of total construction waste was recycled in 2023, and the project maintains a policy of recycling all excess concrete to minimize waste generation. Construction and demolition activities adhere to the EU Construction and Demolition Waste Management Protocol.
- For DNSH to the protection and restoration of biodiversity and ecosystems: Financed projects under this category are subject to an EIA, which are required for all long distance railway traffic, according to the EIA-directive (Directive 2014/52/EU). Further safeguards are provided through the country's Nature Conversation Act and the Forest Act. For Banedanmark specifically, maintenance of trackside vegetation is scheduled to avoid disrupting wildlife breeding seasons, and fauna passages are

established to mitigate habitat fragmentation. For the Fehmarnbelt project, the issuer follows a “building with nature” approach to compensate for the loss of protected habitats.

Analysis of the generic DNSH

Aligned = ✓ Not aligned = ✗ Not applicable = **N.A.**

Opinion	Environmental objective	Key findings
✓	Climate adaptation	Eligible activities financed with EU Green Bond proceeds are subject to a robust national climate risk and vulnerability assessment framework in Denmark. Physical climate risks, including increased precipitation, flooding, and storm surges, are monitored and assessed by the Danish Meteorological Institute (DMI) through the Climate Atlas. This assessment utilizes climate projections across various scenarios (RCP 2.6, RCP 4.5, and RCP 8.5) through the year 2100, ensuring that risk identification is consistent with the highest available resolution and the expected lifetime of the infrastructure. Climate adaptation is managed through a shared responsibility framework between the national government and municipalities, supported by the National Climate Adaptation Plan. Under the Danish Planning Act, municipalities are legally mandated to identify and plan for the protection of infrastructure and facilities from physical climate changes. This includes the competence to require that relevant adaptation measures are implemented as a condition for the approval and commissioning of assets at risk of flooding or erosion. Furthermore, all Danish municipalities have committed to climate adaptation and mitigation plans aligned with the goals of the Paris Agreement. This integrated regulatory approach ensures that adaptation solutions are identified, implemented, and consistent with local, sectoral, and national strategies, thereby minimizing the risk of adverse effects on the resilience of people, nature, and other economic activities.
✓	Sustainable water	Eligible activities financed with EU Green Bond proceeds are governed by a stringent regulatory framework designed to preserve water quality and prevent water stress in accordance with Directive 2000/60/EC. To ensure the achievement of good water status and ecological potential, developers are required to demonstrate, describe, and assess all significant direct and indirect impacts of a project on water resources. These assessments must be shared with the relevant authorities as part of the mandatory EIA process conducted under the Environmental Assessment Act. Furthermore, a project's potential contribution to improving or maintaining water conditions is integrated directly into the project selection criteria. This approach ensures that all activities are screened for environmental degradation risks and that any identified impacts on water bodies or marine environments are addressed prior to project commencement, thereby ensuring compliance with both national requirements and EU water protection standards.
✓	Biodiversity protection	Eligible activities financed with EU Green Bond proceeds are subject to a comprehensive regulatory framework designed to protect biodiversity and ensure the conservation of natural habitats. In accordance with the Danish Act of Environmental Assessment (EAA), which transposes the EU EIA and SEA Directives, all projects categorized under Annex 1 or 2 of the EAA must undergo a mandatory EIA or screening prior to the commencement of work. The resulting development consent must explicitly detail the measures envisaged to avoid, prevent, reduce, or offset significant adverse environmental effects, including the implementation and monitoring of these measures. Furthermore, the EU Birds and Habitats Directives are fully implemented in Denmark, with Natura 2000 areas integrated into the national biodiversity strategy. For any activities located in environmentally vulnerable areas or those containing special natural assets requiring protection, a full EIA is required as standard to ensure appropriate mitigation and compensation. This regulatory structure ensures that the scale, duration, and parameters of environmental monitoring are proportionate to the nature and significance of the project's impact, thereby maintaining the integrity of protected ecosystems and biodiversity-sensitive areas.

Minimum safeguards assessment at issuer level

Aligned = ✓ Not aligned = ✗

Opinion	Key findings
✓	We consider the Kingdom of Denmark to comply with the minimum safeguards required by the EU Taxonomy. Denmark demonstrates this compliance through a three-level approach encompassing international treaty ratification, adherence to global corporate guidelines, and the implementation of stringent domestic legislation and expectations for corporate conduct. At the general sovereign level, Denmark has ratified all essential international human rights and business conventions, including the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the eight fundamental conventions of the International Labor Organization. The country's commitment to these standards is validated by high quantitative scores from the World Bank, Freedom House, and Transparency International, reflecting strong adherence to human rights and a very low level of corruption. Furthermore, the latest Universal Periodic Review identified no business or human rights issues within the jurisdiction. Regarding international guidelines for corporates, the Kingdom of Denmark formally adheres to the OECD Guidelines for Multinational Enterprises, supported by an effective National Contact Point. The sovereign has also demonstrated its commitment to the U.N. Guiding Principles on Business and Human Rights through the implementation of a national action plan. Denmark ensures that these international standards are translated into domestic corporate expectations. The Danish Financial Statements Act requires large corporations to report on their sustainability approaches and policies. Additionally, specific sustainability expectations are established for state-owned enterprises, and public procurement processes--facilitated by Statens og Kommunernes Indløbsservice--mandate that suppliers commit to following both the OECD Guidelines and the U.N. Guiding Principles. Through this comprehensive framework, Denmark ensures that human rights, labor rights, anti-corruption, and fair competition standards are upheld across both the public and private sectors.

N.A. Article 5: Flexibility in the use of the proceeds of EuGBs

The Kingdom of Denmark has not made use of flexibility in the use of proceeds as per Article 5 of the EuGBR.

✓ Article 6: Financial assets

A portion of the EU Green Bond proceeds has been used in the form of on-lending to state-owned entities, such as Energinet. Under this structure, the Kingdom of Denmark acquires a financial asset from the entity, which in turn uses the proceeds to finance the specific green expenditure documented in the Kingdom of Denmark's EU Green Bond Factsheet. The integrity of this allocation is maintained by the Danish parliament, which mandates annual spending through specific appropriation accounts in the Finance Act. Because these appropriations are legally and administratively tied to their designated objectives, the funds can only be used for the specific activities and under the conditions set out for the relevant account. In our view, this framework ensures that the allocation is consistent with the provisions of Article 6 of the EuGBR, since the sequence of financing involves no more than three subsequent financial assets and the proceeds are ultimately allocated to the specific uses set out in Article 4(1).

N.A. Article 7: Capex plan

The Kingdom of Denmark has allocated all the proceeds to finance and refinance activities that are already fully aligned with the EU Taxonomy using the gradual approach.

✓ Article 8: Application of the TSC and grandfathering

We consider that the Kingdom of Denmark meets Article 8 requirements, since proceeds were allocated only to activities that were already fully aligned with the EU Taxonomy at the time of issuance.

✔ Allocations in accordance with EuGB factsheet

As per the Kingdom of Denmark's 2025 European Green Bond Allocation Report, the proceeds from the 2025 issuance (totaling DKK 8.27 billion) were allocated according to a prioritization framework. At pre-issuance stage, the estimated breakdown reflected the composition of the total pool of eligible green expenditure. However, the actual allocation resulted in a significantly higher share for renewable energy (more than 80%), driven by the allocation to Energinet. This discrepancy is based on the fact that the issued amount covered only approximately 51% of the total eligible green expenditure pool (DKK 16.186 billion) identified for the period.

Consequently, applying the prioritization framework resulted in higher-ranked activities (2.1, 4.1, 4.3, 4.9, and 4.17) being fully financed by bond proceeds, while bond proceeds financed only approximately 13% of the expenditure under activity 6.14 (clean transportation).

Allocation Analysis

This section provides information on the allocation of proceeds, using our Shades of Green.

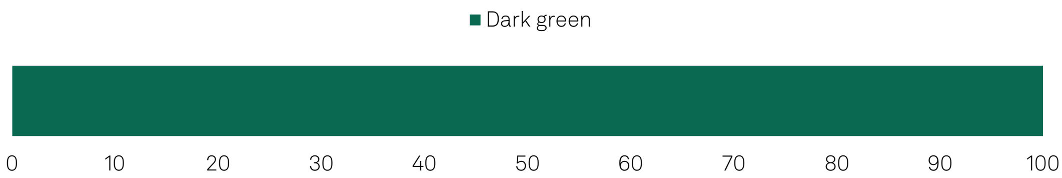
Environmental projects

- As of Dec. 31, 2025, DKK 8.27 billion of proceeds from the issuer's 10-year EuGB were allocated, meaning all proceeds are fully allocated. 60% of these went to EU Taxonomy activity 4.9, transmission and distribution of electricity. The remainder supported EU Taxonomy-aligned activities across renewable energy (about 21%), the restoration of wetlands (about 6%), and clean transportation (13%).
- The allocations consist primarily of financing provided to the state-owned enterprise Energinet as well as subsidies.

Shades of Green

- The significant allocation to Energinet contributes to the state-owned company's aim to modernize the electrical grid through the commissioning of 72 stations and transformers and 91 new facility connections. Key strategic projects, such as the Aarhus-Aabenraa and West Coast connections, will reinforce critical consumption and production areas to ensure grid stability in Denmark. Investments in grid infrastructure play an enabling role in the energy transition, but the climate impact ultimately depends on the emission intensity from the electricity transmitted through the financed grid. Denmark's consumption-based emissions are in line with the level we typically associate with a low-carbon grid, and therefore we asses these investments as Dark green.
- We also assign a Dark green shade to this the remaining projects within the renewable energy category that focus on supporting the build-out of renewable generation technologies, notably solar PV and wind.
- We assess the allocation to the restoration of wetlands within the environmentally sustainable management of living natural resources and land use category as Dark Green . The conversion of carbon-rich low-lying soils is part of the country's Green Land Fund, an initiative to reduce nitrogen and CO_2 emissions while enhancing biodiversity. Activities are characterized by measurable climate targets, including a projected increase in annual CO_2 sequestration to 1.7 million tons by 2045, and utilize IPCC-aligned scientific monitoring to ensure land-use stability and the provision of ecosystem services.
- The allocation to rail projects is shaded Dark Green, supporting the decarbonization of land transport through critical infrastructure investments by Banedanmark and Femern A/S Landanlæg. These activities are aligned with Denmark's Infrastructure Plan 2035, which aims for 100% electrification or battery-readiness of the state's railway trackside infrastructure.

Environmental allocations as of Dec. 31, 2025 (% of allocation per shade)



Source: S&P Global Ratings.

Reporting Quality Assessment

This section provides an opinion on the quality of the issuer's post-issuance allocation reporting relating to the framework.

Alignment with reporting requirements

The report aligns with the requirements for allocation reporting contained in the Green Bond Principles, ICMA, 2025. The allocation report is prepared within 12 months of the first issuance and, therefore, within the time frame permitted by the EuGBR.

The issuer's allocation report follows the template of the EuGBR Annex II, which stipulates that reporting on the environmental impact of bond proceeds is not required.

EuGBR Annex IV Contents of Post-Issuance Review

This section provides a summary of our EuGB External Review following the EuGBR Annex IV structure. For more detailed information on the assessment and our opinion, please see the above sections of this report.

General information

Date of issuance of the bond or tranches of the bond: Sept. 23, 2025, and Nov. 19, 2025

Date of publication of the EuGB factsheet: Sept. 3, 2025

Date of publication of the Allocation Report: Sept. 25, 2026

Legal name of the issuer: Kingdom of Denmark

Legal entity identifier of the issuer: 549300PTO6LS1PTM6607

Name of the bond assigned by the issuer: DGB 2.25 per cent 2035 G

International securities identification numbers DK0009925182

Identity and contact details of the external reviewer:

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Lead analyst in a given assessment activity: Rafael Heim, Associate Director

Person primarily responsible for approving the review: Luisina Berberian, Director

S&P Global Ratings Europe provided other services to the assessed entity or any related third party, such as public credit ratings or ancillary and other services. S&P Global Ratings’ internal policies and procedures are designed to assist elimination or management and disclosure of any actual or potential conflicts of interest. Please see S&P Global Ratings' Conflict of Interest for more information.

Introductory statements

For the EuGB pre-issuance, post-issuance allocation and impact report external reviews, we apply our "Analytical Approach: European Green Bond External Reviews", which describes S&P Global Ratings' analytical approach for providing an external review of a EuGB and assessing the issuer’s EuGB factsheet, EuGB Allocation Report, and EuGB Impact Report laid down in Annex I, II, and III to Regulation (EU) 2023/2631.

The EuGBR requires reviewers to state, '"this review represents an independent opinion of the external reviewer and is to be relied upon only to a limited degree."' Although we do not provide any assurance regarding the information provided to us, we assess whether the issuer has demonstrated how it meets the requirements of the EuGBR. Our EuGB external reviews are not credit ratings, do not assess credit quality, and do not factor into our credit ratings.

Statements on the alignment of use of proceeds with Regulation (EU) 2020/852 of the European Parliament and of the Council

For the post-issuance

Regarding the alignment of the use of proceeds of the European Green Bond (or Bonds) with Regulation (EU) 2020/852 based on the information provided by the issuer:

- We believe the bond(s) meet the requirements of Regulation (EU) 2023/2631 as regards the use of proceeds

Sources, assessment methodologies, and key assumptions

For the EuGB pre, post-issuance external reviews, we apply our "Analytical Approach: European Green Bond External Reviews", which describes S&P Global Ratings' analytical approach for providing an external review of a EuGB, specifically reviews under Regulation (EU) 2023/2631 of the European Parliament and of the Council. Our pre-issuance, post-issuance, and impact report external reviews are point-in-time analyses and are not surveilled. Additionally, they rely on the accuracy, timeliness, and completeness of the information provided by the issuer. Our pre-issuance review of a EuGB factsheet's alignment with the EuGBR does not automatically apply to all transactions under the factsheet.

The documents we assess are the issuer's EuGB pre-issuance factsheet, allocation report, and impact report. We review the issuer's rationale in the factsheet as to why its financed economic activities meet the EU Taxonomy's requirements. Nevertheless, we may require additional information from the issuer to make an assessment, given the potential length and specificity of the technical screening criteria and minimum safeguards requirements.

Assessment and opinion

For the post-issuance review

Based on the information provided by the issuer, we believe that the issuer has allocated the proceeds of the bonds in alignment with Articles 4 to 8 of Regulation (EU) 2023/2631 as follows:

- For Article 4, the issuer allocated proceeds, in accordance with the taxonomy requirements, following the gradual approach, to financial assets that were created no more than five years after the issuance (i.e., with Article 4(1)(d));
- For Article 5, we consider this not applicable, as the issuer has not made use of flexibility in the use of proceeds;
- For Article 6, the issuer allocated bond proceeds to financial assets to the uses set out in Article 4(1) and in line with Article 6(2);
- For Article 7, we consider this not applicable, since the issuer has allocated all the proceeds to finance and refinance activities that are already fully aligned with the EU Taxonomy using the gradual approach;
- For Article 8, the issuer ensured:
    - Proceeds were allocated in alignment with the technical screening criteria applicable at the time of issuance of the bond; and
    - Where technical screening criteria are amended after the issuance of the bond, the proceeds that are not yet allocated will be allocated in alignment with the amended technical screening criteria no later than seven years after the date of application of the amended criteria.

Based on the information provided by the issuer, we believe the issuer has complied with the intended use of proceeds set out in the European Green Bond factsheet.

For more information, please see above sections of this report.

Other information

Within the analysis of this review, we believe there are relevant aspects that complement the alignment analysis with the EuGBR and provide greater transparency to investors. Please refer to the following sections of the report:

- Shades of Green Assessment--Our qualitative assessment of how consistent an economic activity or financial investment is with a low-carbon, climate resilient future.

Alignment Assessment--Our opinion on whether the financing documentation aligns with certain third-party published sustainable finance principles and guidelines identified by the issuer.

S&P Global Ratings' Shades of Green

Assessments	**Dark green**	**Medium green**	**Light green**	**Yellow**	**Orange**	**Red**
Description	Activities that correspond to the long-term vision of an LCCR future.	Activities that represent significant steps towards an LCCR future but will require further improvement to be long-term LCCR solutions.	Activities representing transition steps in the near-term that avoid emissions lock-in but do not represent long-term LCCR solutions.	Activities that do not have a material impact on the transition to an LCCR future, or, Activities that have some potential inconsistency with the transition to an LCCR future, albeit tempered by existing transition measures.	Activities that are not currently consistent with the transition to an LCCR future. These include activities with moderate potential for emissions lock-in and risk of stranded assets.	Activities that are inconsistent with, and likely to impede, the transition required to achieve the long-term LCCR future. These activities have the highest emissions intensity, with the most potential for emissions lock-in and risk of stranded assets.
Example projects	Wind power	Certified forestry	New energy efficient buildings	Fossil fuel buses	Conventional steel production	Oil and gas exploration

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).

Related Research

- Analytical Approach: Sustainable Financing Post-Issuance Reviews, June 30, 2025
- FAQ: Applying Our Analytical Approach for Post Issuance-Reviews, June 30, 2025
- Analytical Approach: Second Party Opinions, March 6, 2025
- FAQ: Applying Our Integrated Analytical Approach For Second Party Opinions, March 6, 2025
- Analytical Approach: EU Taxonomy Assessment, Oct. 31, 2024
- Analytical Approach: European Green Bond External Reviews, Oct. 31, 2024
- FAQ: Applying Our Analytical Approach For European Green Bond External Reviews, Oct. 31, 2024
- Analytical Approach: Shades of Green Assessments, July 27, 2023

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