

Luxembourg, 11/11/2025

Environmental and Social Data Sheet¹

Overview

Project Name:	EIFFEL GREEN MOLECULES II	
Project Number:	2025-0015	
Country:	<i>Regional - EU countries</i>	
Project Description:	Fund focusing on the production, storage & distribution of low-carbon molecules (including biogas/biofuels)	
EIA required:	yes (potentially for some investments)	
Invest EU sustainability proofing required:	Yes	
Project included in Carbon Footprint Exercise ² :	No	

Environmental and Social Assessment

Environmental Assessment

The infrastructure Fund will invest equity in the low carbon molecule sectors, encompassing renewable gas (biogas, e-gas, green Hydrogen) and sustainable fuels (biofuels, e-fuels), and finance infrastructure across the value chain of these sectors, from production, distribution, and storage to the usage of low carbon molecules. The projects will be located in the EU/EFTA (France, Spain, Italy, Germany, Poland) and some outside of EU (North America).

The financing of this operation is in line with the Bank's lending priority objectives on Energy (Energy Efficiency and Renewable Energy) as well as the transversal objectives on Climate Action (mitigation), Environmental Sustainability (Pollution Prevention Control) and Social and Economic Cohesion. The operation will contribute 100% to climate action.

The Fund Manager (FM) has good expertise and appropriate procedures to ensure E&S due diligence as part of its investment process. The FM has developed an Environmental and Social Management System (ESMS) that complies with SFDR and EU Taxonomy regulations and is aligned with EIB requirements.

A significant portion of the investments will generate environmental benefits in terms of reduction of air pollutants and GHG emissions, ultimately helping to mitigate climate change. The investments targeted by the operation are expected to have limited social and environmental impacts, provided that all mitigation measures are implemented.

The Fund's underlying investments in the EU will fall under Annex I or II of EIA Directive 2011/92/EU, requiring an Environmental Impact Assessment (EIA) including public consultation or screening by the national competent authority on the basis of Annex III of the same Directive to determine the need for an EIA. If an underlying investment is subject to an EIA, the Fund

¹ The information contained in the document reflects the requirement related to the environmental, social and climate information to be provided to the Investment Committee as required by the Invest EU Regulation and it represents the equivalent of the information required in the template of the InvestEU sustainability proofing summary.

² Only projects that meet the scope of the Carbon Footprint Exercise, as defined in the EIB Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: 20,000 tonnes CO₂e/year absolute (gross) or 20,000 tonnes CO₂e/year relative (net) – both increases and savings.



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Manager is required to store and keep relevant project documents providing evidence of compliance with the EIA Directive and national environmental regulations (such as EIA screening decisions, environmental studies, environmental monitoring reports or equivalent documents), and shall upon request promptly deliver such documents to the Bank. The Fund Manager will be required to publish the EIA on its website or provide a website link to the location where the EIA is published. The Fund Manager will confirm that the project incorporates all mitigating measures stated in the EIA.

The Fund Manager will be required to verify that none of the schemes has a significant negative impact on any site of nature conservation importance, including sites protected under the "Habitats" and "Birds" Directives (92/43/EEC and 2009/147/EC respectively) and the associated Natura 2000 network, Water Framework Directive (2000/60/EC), national legislation and international agreements. If in the reasonable view of the Fund Manager an investment has the potential to significantly affect sites of nature conservation importance, it shall ensure that an appropriate assessment is carried out for the potentially affected sites and obtain written confirmation from the competent authority as defined in the relevant EU Directives, or an equivalent assessment satisfactory to the EIF, that the investment does not have a significant negative impact on any protected site. If an underlying investment is subject to an EIA or biodiversity assessment, the Fund Manager will be required to publish the Environmental and Social Impact Study (or a link) on its website for access by stakeholders.

The Fund will ensure that all projects are in compliance with national and European legislation (where applicable), as well as the EIB's E&S standards and relevant Invest EU sustainability proofing requirements. The Fund is not allowed to invest in activities marked as 'Not Supported' in the EIB Climate Bank Roadmap 2021-2025.

EIB Paris Alignment for Counterparties (PATH) Framework

The Fund's investments will contribute to mitigating climate change. The Fund has been assessed for Paris alignment and is considered to be aligned both against low carbon and resilience goals, and against the policies set out in the Climate Bank Roadmap. In accordance with the EIB Group requirements³, the Fund will ensure Paris Alignment of all its investments, as part of the legal documentation.

The Fund Manager manages more than EUR 500m. The Fund Manager is therefore in scope of and screened into the EIB Group PATH Framework. Hence, the EIF will require the Fund Manager to report – at the latest 12 months after signature – in line with the recommendations of the Task Force on Climate Related Financial Disclosures (TCFD), or International Sustainability Standards Board (ISSB) IFRS S2.

Social Assessment

There are no material issues identified at this stage in relation to social aspects in the expected pipeline. The ESMS will duly define the policies and procedures related to social aspects that will apply to the investments, among others, impacts to vulnerable groups and Indigenous peoples. The ESMS shall be aligned with the EIB E&S standards.

Furthermore, the ESMS will also include a Human Rights Policy and a Code of Ethics, rejecting the use of any form of forced or compulsory labour, applicable inter alia to the supply chain of the underlying solar PV projects, in compliance with the applicable provisions of the relevant EIBG E&S standards, the national laws and the principles and standards of ILO conventions (in particular prohibition of child or bonded labour, non-discrimination and equal opportunity of employment, occupational health and safety).

³ [The EIB Group Climate Bank Roadmap 2021-2025](#)



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The Fund will be required to undertake reasonable efforts to assess and address the risks of forced labour in the supply chain. This will include, on a reasonable effort basis, enhanced due diligence, commensurate with the capacity and leverage of the developers regarding labour issues in the supply chain (supply chain mapping and/or declarations from the supplier, per project) ensuring that appropriate contractual provisions are cascaded to contractors/suppliers of the sub projects.

Public Consultation and Stakeholder Engagement

As required by EU Member States' laws and regulations, the Fund Manager shall ensure that a consultation process with relevant stakeholders takes place and that an appropriate grievance mechanism is in place, including the development of a communication mechanism with external stakeholders as part of the Grievance Redress Mechanism for the underlying investments. The Fund Manager will ensure that a grievance mechanism at Fund level is also in place. Both mechanisms are currently included in the ESMS.

Conclusions and Recommendations

During appraisal it has been verified that the Fund Manager has fully understood the EIF E&S requirements and will be willing and capable to fully implement them.

In order to strengthen the coordination and accountability aspects the Fund shall:

- Publicly disclose, to the reasonable satisfaction of the Bank, its climate-related governance, strategy, risk management, and metrics and targets in line with the recommendations of the Task Force on Climate Related Financial Disclosures (TCFD), Corporate Sustainability Reporting Directive (CSRD), or International Sustainability Standards Board (ISSB), within 12 months of the EIF contract signature.
- Set up and maintain a communication mechanism for external stakeholders as part of its Grievance Mechanism.
- Publish the EIA studies on the Fund's website or the link to the location where the EIA is published.

In view of the above findings and conditions, the operation is deemed satisfactory from an environmental and social compliance perspective.