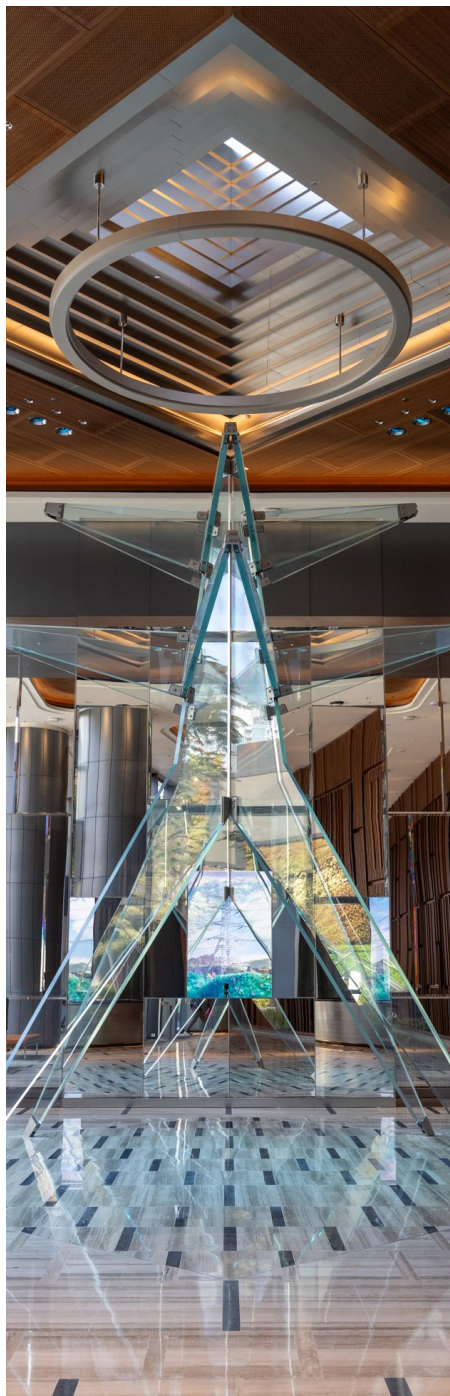


# CLP's Climate Action Finance Framework



June 2026

Stock Code: 00002



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# Introduction

## CLP's Business Overview

The CLP Group is one of the largest investor-owned power businesses in Asia Pacific with diversified investments across Hong Kong, the Chinese Mainland, Australia, India, Taiwan Region and Southeast Asia. Hong Kong-listed CLP Holdings Limited is the holding company for the CLP Group, whose business spans every major segment of the electricity value chain ranging from power generation, transmission and distribution to retail and smart energy services. We are harnessing new opportunities and expanding our reach to meet the evolving needs of energy users in an increasingly decarbonised and digital world.

### Our Business (as of 31 December 2025)



### Operations and Technologies

- Wind
- Solar
- Hydro
- Waste-to-energy
- Nuclear
- Gas
- Coal
- Energy Storage
- Transmission and Distribution
- Retail
- Smart Meters
- LNG Terminal
- Others (e.g. oil, energy services)

### Generation and Energy Storage Capacity<sup>2,3</sup> > 23,300MW

Non-carbon Generation <sup>2,3</sup>		
	7,688MW	33%
Wind	2,800MW	12%
Solar	1,650MW	7%
Hydro	489MW	2%
Nuclear	2,750MW	12%
Gas	6,118MW	26%
Coal	8,140MW	35%
Others	1,421MW	6%
e.g. waste-to-energy, oil, energy storage		

### Transmission and Distribution Lines<sup>2,4</sup> > 17,600 km

#### Smart Meters

> 3.7 million

connected for Hong Kong and Australia customers

2.5 million

installed in India

#### Customer Accounts

5.2 million

2.9 million  
in Hong Kong

2.3 million  
in Australia

For the latest overview of CLP's business, please see the [Investor Presentation – Introductory Pack](#) on the CLP Group website.

1. Transmission assets only.  
2. On an equity plus long-term capacity and energy purchases basis.  
3. In operation and under construction. Minor discrepancies may result from rounding.  
4. In operation only.

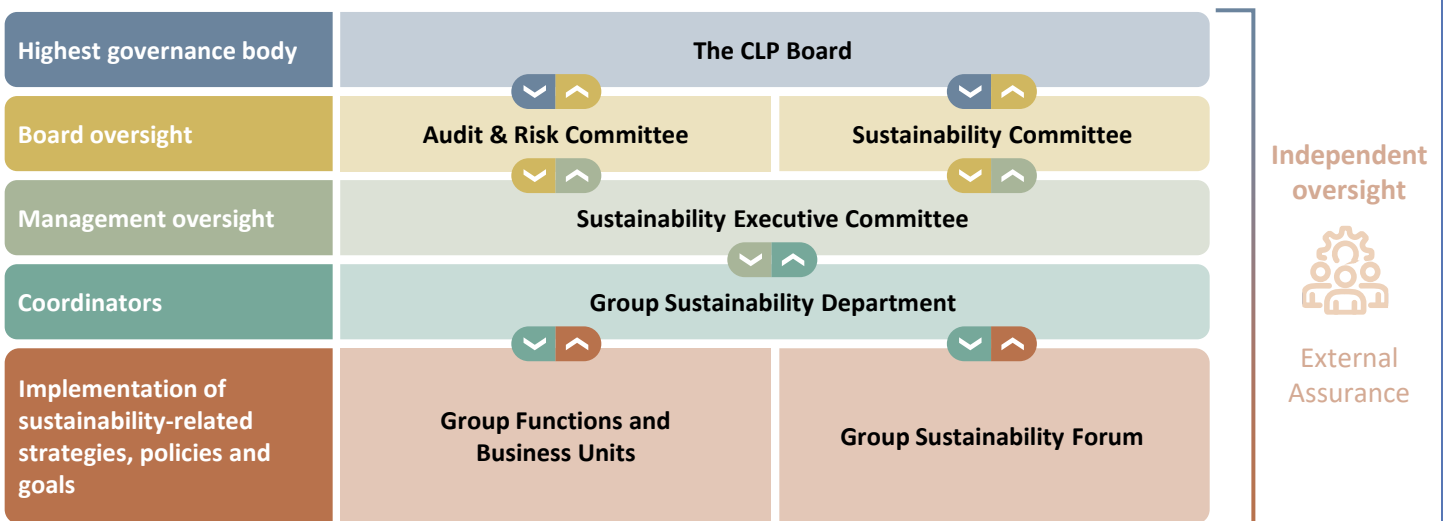
## CLP's Sustainability Governance

Sustainability governance has been institutionalised in the Group's corporate governance structure, from the CLP Board to Group functions and business units.

The Sustainability Committee and Audit & Risk Committee, have complementary roles in sustainability management, supported by the Sustainability Executive Committee and coordinated by the Group Sustainability Department.

### Sustainability Committee

Sustainability is embedded within CLP's business strategy and the CLP Board has overall responsibility for sustainability as well as business strategy. The Sustainability Committee holds the primary role of overseeing the management of the Group's sustainability matters. It places a high priority on climate change developments and CLP's own climate action, with particular emphasis on the potential impact of longer-term sustainability topics on the Group's business strategy. Chaired by an Independent Non-executive Director, the Committee comprises seven Non-executive Directors, five of whom, including the Chair, are Independent Non-executive Directors. The composition of the Sustainability Committee is as of 8 May 2026. Any changes to membership are disclosed on the CLP Group website and annually in CLP's Annual Report.



Overview of work conducted by the Sustainability Committee includes:

- Climate-related matters
- Other sustainability matters, including risks, opportunities and emerging issues
- Sustainability reporting and performance against sustainability indices
- Sustainability governance
- Health, safety, security and environment
- Community, charitable and environmental partnerships and initiatives

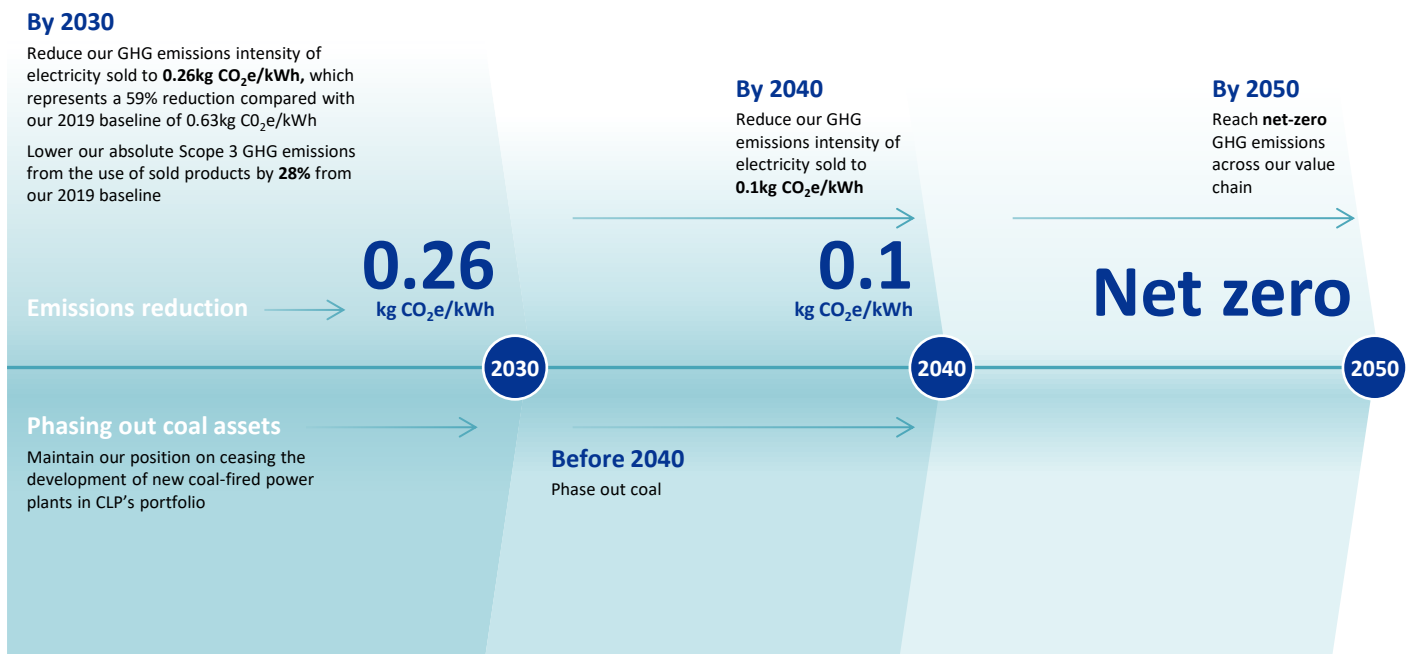
## CLP's Climate Vision 2050

CLP's vision is to be a leading responsible energy provider, from one generation to the next. Its Climate Vision 2050<sup>5</sup> is the blueprint of the Group's transition to a net-zero greenhouse gas (GHG) emissions business by mid-century. Since its launch in 2007, Climate Vision 2050 has informed CLP's business strategy and guided CLP's investment decision-making. It is also integral to CLP's broader climate strategy and takes into consideration CLP's climate scenario analysis and assessment of climate-related risks and opportunities.

Delivering Climate Vision 2050 remains one of CLP's strategic priorities. Progress against climate-related targets and key metrics is monitored on an ongoing basis, with annual disclosures provided in the Annual Report in compliance with Hong Kong Financial Reporting Standard S2 Climate-related Disclosures.

The Group is committed to reviewing the plan at least every three years, taking into account the latest climate science, policy drivers, technological advancement, industry trends and community expectations. Any future updates will be made available on the CLP Group website.

### CLP's key targets and commitments



## Decarbonisation levers under CLP's Climate Vision 2050

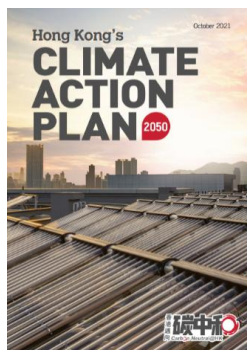
The Group focuses on six key levers through which it can manage emissions and support the energy transition across its Asia Pacific markets. CLP's primary focus is on reducing generation-related emissions and building infrastructure that enables the transition to a lower-carbon energy system. On the demand side of the value chain, technological advancements are enabling customers to manage energy use more efficiently.

- ❖ Phase out coal-fired power plants
- ❖ Enable a fuel switch for power generation – transitioning from coal to gas/hydrogen
- ❖ Grow non-carbon energy – expanding nuclear and renewables
- ❖ Build infrastructure to support non-carbon energy delivery and renewable energy growth
- ❖ Enable greater electrification
- ❖ Increase energy efficiency

For more information on the Group's decarbonisation approach, please refer to [CLP's Climate Vision 2050](#).

In Hong Kong, CLP pledges full support for the Hong Kong Special Administrative Region (Hong Kong) Government's commitment to achieving carbon neutrality before 2050 and recognises the importance of a clear and credible policy framework to guide the city's decarbonisation pathway. In this context, Hong Kong's Climate Action Plan 2050 and the Hong Kong Taxonomy for Sustainable Finance serve as important reference points for sustainability-related activities and financing in Hong Kong.

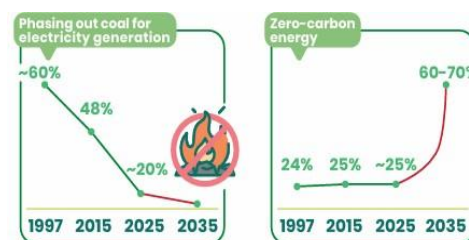
## Hong Kong's Climate Action Plan 2050



According to the Hong Kong Government's latest greenhouse gas emission inventory, electricity generation accounted for around 61% of Hong Kong's total carbon emissions<sup>6</sup>. While electricity generation is a key driver of emissions in Hong Kong, the share of coal in the fuel mix for electricity generation in the city has been reduced from around 60% in 1997 to around 20% in 2025<sup>7</sup>. As outlined in Hong Kong's Climate Action Plan 2050<sup>8</sup>, the Government aims to reduce the city's carbon emissions by half from the 2005 levels before 2035 and achieve carbon neutrality before 2050. Published in 2021, the plan sets out four major decarbonisation strategies, namely "net-zero electricity generation", "energy saving and green buildings", "green transport" and "waste reduction".

Under net-zero electricity generation, the HKSAR Government strive to achieve the long-term target of net-zero electricity generation<sup>9</sup> before by ceasing the use of coal for daily electricity generation by 2035; exploring and trying out the use of different types of zero-carbon energy for electricity generation and exploring ways to strengthen regional co-operation; and increasing the share of zero-carbon energy in the fuel mix for electricity generation to around 60% to 70% before 2035. In the medium term, the Hong Kong Government will continue to increase the use of natural gas and zero-carbon energy to replace coal for electricity generation.

Any future updates to the Climate Action Plan 2050 should be referred to in the Hong Kong Government's official announcements.



**Net-zero Electricity Generation's progress and target by 2035**

Source: [Hong Kong's Climate Action Plan 2050 Strategies & Progress](#)

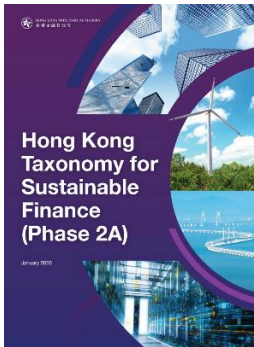
6. <https://www.info.gov.hk/gia/general/202601/22/P2026012200196.htm>

7. [https://cnsd.gov.hk/wp-content/uploads/2025/06/CAP2050-progress-pamphlet\\_EN\\_website.pdf](https://cnsd.gov.hk/wp-content/uploads/2025/06/CAP2050-progress-pamphlet_EN_website.pdf)

8. [https://cnsd.gov.hk/wp-content/uploads/pdf/CAP2050\\_booklet\\_en.pdf](https://cnsd.gov.hk/wp-content/uploads/pdf/CAP2050_booklet_en.pdf)

9. [https://cnsd.gov.hk/wp-content/uploads/2023/05/Net-zero-Electricity-Generation\\_en.pdf](https://cnsd.gov.hk/wp-content/uploads/2023/05/Net-zero-Electricity-Generation_en.pdf)

## The Hong Kong Taxonomy for Sustainable Finance



The Hong Kong Monetary Authority (HKMA) developed the Hong Kong Taxonomy for Sustainable Finance (thereafter referred to as the “Hong Kong Taxonomy” or “the Taxonomy”) to provide a systematic framework for defining and classifying environmentally sustainable economic activities.

In alignment with Hong Kong’s Climate Action Plan 2050, the Hong Kong Taxonomy aims to provide a common standard and accelerate the allocation of capital towards activities that enable the transition to a low-carbon economy. By aligning with international frameworks and catering for local contexts, the Taxonomy is designed to facilitate green and sustainable finance flows not only in Hong Kong, but also across the Chinese Mainland, the wider Asia region, and beyond.

Phase 1<sup>10</sup> of the Taxonomy was published in May 2024 encompassing four sectors with 12 activities. In Phase 2A<sup>11</sup> of the Taxonomy, published in January 2026, the scope was expanded to six sectors with 25 activities. This phase included transition categories covering carbon-intensive activities that are on a time-bound decarbonisation pathway aligned with a trajectory to limit global warming to 1.5°C above pre-industrial levels and to ultimately reach net zero in 2050. Future development areas of the Taxonomy may consider, subject to further assessment and consultation, the potential inclusion of transitional and low-carbon energy sources such as natural gas-fired power generation and nuclear power generation, in view of their potential roles in supporting Hong Kong’s decarbonisation over time. Any future updates to the Hong Kong Taxonomy for Sustainable Finance should be referred to in the Hong Kong Monetary Authority’s official announcements.

10. <https://www.hkma.gov.hk/eng/news-and-media/press-releases/2024/05/20240503-3/>

11. <https://www.hkma.gov.hk/eng/news-and-media/press-releases/2026/01/20260122-3/>

# Overview of the Climate Action Finance Framework

The CLP Climate Action Finance Framework (CAFF) was first published in July 2017 and subsequently updated in June 2020. The objective of the CAFF is to support the transition to a lower-carbon economy by attracting socially responsible and sustainable financing to support CLP's investments that enable lower-carbon-intensity energy generation and enhance energy efficiency.

CLP is committed to upholding high standards of environmental, social and governance (ESG) performance, with reference to the latest developments and advancements in ESG taxonomies across different geographic regions, to the extent applicable. CLP also actively reviews and, where appropriate, adapts the CAFF to reflect evolving stakeholder expectations and market practices.

The CAFF sets out CLP's approach to raising climate action finance, including through the issuance and arrangement of bonds, loans and other forms of finance, and to deploying the proceeds of such transactions towards projects that are consistent with CLP's strategy for responding to the climate change-related challenges.

## 2.1 Use of Proceeds

CLP's business units that are majority owned and/or managed by CLP (CLP Business Units) may enter into CLP Climate Action Finance Transactions (CAFTs) under the CAFF. For projects which are not wholly-owned by CLP Business Units, including assets managed but not owned by CLP, the allocation of use of proceeds will be adjusted on a pro-rata basis reflecting CLP's equity ownership and/or the portion of financing attributable to eligible managed assets, as appropriate. There are two types of CAFTs – Energy Transition Finance Transactions and New Energy Finance Transactions.

The CAFF governs the issuance of Energy Transition Finance Transactions and New Energy Finance Transactions by CLP Business Units, including but not limited to bonds and loans. The net proceeds of CAFTs will be used to finance and/or refinance, in whole or in part, new or existing Energy Transition Finance and/or New Energy Finance assets/ projects, which follow the criteria set out under (A) Energy Transition Finance Transactions and/or (B) New Energy Finance Transactions (Eligibility Criteria).

Energy Transition Finance Transactions	New Energy Finance Transactions
<ul style="list-style-type: none"> <li>To finance and/or refinance eligible Energy Transition assets/projects</li> </ul>	<ul style="list-style-type: none"> <li>To finance and/or refinance eligible New Energy assets/projects</li> </ul>
<ul style="list-style-type: none"> <li><b>Bonds:</b> bonds under Energy Transition Finance Transactions will be aligned with the 2025 Climate Transition Bond Guidelines<sup>12</sup> (CTBG) published by the International Capital Markets Association (ICMA), or as it may subsequently be updated</li> <li><b>Loans:</b> loans under Energy Transition Finance Transactions will be aligned with the exposure draft of the Transition Loan Principles<sup>13</sup> (TLP) in the Guide to Transition Loans 2025 published jointly by the Loan Market Association (LMA), the Asia Pacific Loan Market Association (APLMA) and the Loan Syndications and Trading Association (LSTA), or as it may subsequently be updated</li> </ul>	<ul style="list-style-type: none"> <li><b>Bonds:</b> bonds under New Energy Finance Transactions will be aligned with the 2025 Green Bond Principles<sup>14</sup> published by ICMA, or as it may subsequently be updated</li> <li><b>Loans:</b> loans under the New Energy Finance Transactions will be aligned with the 2025 Green Loan Principles<sup>15</sup> jointly published by LMA, APLMA and LSTA, or it may subsequently be updated</li> </ul> <p>Where relevant, New Energy Finance Transactions may also align with:</p> <ul style="list-style-type: none"> <li>The Hong Kong Taxonomy for Sustainable Finance Phase 2A, as it may subsequently be updated</li> </ul>
<ul style="list-style-type: none"> <li>Eligible types of investments: Capital expenditures and selected operating expenditures (such as but not limited to: pre-operating costs, interest or coupon paid during construction, finance transaction costs and other direct or indirect costs related to the investment projects) meeting the criteria under the Use of Proceeds section</li> <li>Lookback period: Eligible assets/ projects may include refinancing of operating expenditures funded within 36 months prior to the issuance or signing date of respective CAFTs</li> </ul>	

The CAFF does not place restrictions on the tenor and currency of the CAFTs and will be in force as long as there are outstanding CAFTs. CLP may update the CAFF and commits that any new version will keep or improve the current level of transparency and reporting. Any changes will be communicated to investors via CLP's official website: <https://www.clpgroup.com/en/investor-relations/investor-information/clp-climate-action-finance-framework.html>

The eligible projects that was committed by CLP prior to the publication date of this version of the CAFF shall be governed by the criteria applied under the previous version of the CAFF (June 2020).

The CAFF aligns with the four core pillars of Principles/ Guidelines as well as addresses the Safeguards referred to in CTBG:

- Use of Proceeds;
- Process for Project Evaluation and Selection;
- Management of Proceeds; and
- Reporting

The CAFF also covers the External Review Section.

12. <https://www.icmagroup.org/sustainable-finance/the-principles-guidelines-and-handbooks/climate-transition-finance-handbook/>

13. <https://www.lsta.org/content/transition-loans-guide/>

14. <https://www.icmagroup.org/sustainable-finance/the-principles-guidelines-and-handbooks/green-bond-principles-gbp/>

15. <https://www.lsta.org/content/green-loan-principles/>

## A. Energy Transition Finance Transactions<sup>16</sup>

Energy Transition Category <sup>17</sup>	Eligibility Criteria	Energy Transition Project Examples	Environmental Objective
Transition Fuels – Coal to Gas	<p>Gas-fired power plants and its associated enabling activities &amp; facilities where the opportunities to develop renewable energy are limited. Related activities and facilities include but not limited to:</p> <ul style="list-style-type: none"> <li>Development, operation, maintenance, refurbishment, upgrade and modification of gas-fired power plants which will result in carbon emission no more than 385gCO<sub>2</sub>e/kWh at baseload; and</li> <li>Associated enabling facilities such as LNG transporting and receiving facilities and other facilities for the receipt and delivery of gas to the plants</li> </ul>	<ul style="list-style-type: none"> <li>Natural gas fired power plant – CCGT units</li> <li>Offshore LNG Terminals</li> </ul>	Climate Change Mitigation

## B. New Energy Finance Transactions

New Energy Category	Sub-category	Eligibility Criteria	Hong Kong Taxonomy Alignment Phase 2A	Environmental Objective
Power Generation	Renewable Energy	<p>Acquisition, construction, development, investment, operation and management of projects, infrastructure and R&amp;D related to the production from the following renewable and clean energy source:</p> <ul style="list-style-type: none"> <li>Solar energy includes solar photovoltaic technology</li> <li>Onshore wind energy</li> <li>Hydropower – lifecycle emissions &lt;50gCO<sub>2</sub>/kWh and power density &gt; 10W/m<sup>2</sup></li> </ul>	<ul style="list-style-type: none"> <li>A-002: Electricity generation using solar photovoltaic technology</li> <li>A-003: Electricity generation from wind power</li> </ul>	Climate Change Mitigation
	Energy Storage	<p>Acquisition, development, construction and operation of energy storage solutions with aim to regulate peak system demand and allow for integration of more low-carbon and/or clean energy sources into the grid</p>	<ul style="list-style-type: none"> <li>A-006: Storage of electricity</li> </ul>	Climate Change Mitigation
Transmission and Distribution of electricity	Transmission and Distribution Infrastructure	<p>Development, construction, retrofit and operation of transmission &amp; distribution of renewable energy and low-carbon fuels, such as:</p> <ul style="list-style-type: none"> <li>Electricity grid connection upgrades allowing flexibility to tap into non-carbon energy including solar, wind and nuclear</li> <li>Smart grids</li> </ul>	<ul style="list-style-type: none"> <li>A-004: Transmission and distribution of electricity</li> </ul>	Climate Change Mitigation

16. Energy Transition Finance Transactions will only focus on assets for the transition of the energy sector in Hong Kong

17. Please refer to Appendix I on relevant components required in alignment with the transition guidelines

## B. New Energy Finance Transactions (continued)

New Energy Category	Sub-category	Eligibility Criteria	Hong Kong Taxonomy Alignment Phase 2A	Environmental Objective
Low carbon transport infrastructure	Clean Transportation	Investment, development, manufacture, installation, maintenance or upgrades of clean transportation infrastructure such as: <ul style="list-style-type: none"> <li>• Electric charging stations</li> </ul>	<ul style="list-style-type: none"> <li>• B-006: Low-carbon transport infrastructure</li> </ul>	Climate Change Mitigation
Energy Efficiency	End-user energy efficiency/management	Development, manufacture, installation, maintenance or upgrades to energy efficiency technologies, products, equipment or energy management systems such as: <ul style="list-style-type: none"> <li>• Demand management projects such as smart metering systems to facilitate energy savings</li> <li>• Construction of district cooling systems<sup>18</sup></li> <li>• Building cooling systems retrofit that yields a minimum of 15% energy efficiency compared to baseline</li> </ul>	<ul style="list-style-type: none"> <li>• A-007: District heating and cooling</li> <li>• C-003: Installation, maintenance, and repair of building equipment</li> </ul>	Climate Change Mitigation

### Exclusion Criteria:

Proceeds will not knowingly be allocated to finance projects that have ever been assessed by CLP as being any of the following:

- Coal power generation

## 2.2 Process for Project Evaluation and Selection

CLP Business Units will make their own determination as to whether they wish to enter into a CAFT under CLP's CAFF. The CLP Group Climate Action Finance Committee (CAFC) made up senior management including representatives from the Finance and Strategy, Sustainability and Governance departments will review and approve all CAFTs under CLP's CAFF.

CLP Business Units will propose to the CAFC eligible projects that can fulfil the criteria as set out in the Use of Proceeds Section in this CAFF for the deployment of proceeds from CAFTs.

A CLP Business Unit choosing to enter a CAFT must fully comply with the CAFF over the full tenor of the respective CAFT.

18. There may not be a baseline applicable, based on [EMSD reference](#), there are typically 35% and 20% energy savings compared with traditional air-cooled and water-cooled AC systems

## 2.3 Management of Proceeds

The proceeds of each CAFT will be credited to dedicated bank accounts/deposit which are normally used for liquidity management purposes of the corresponding CLP Business Unit pending allocation to Eligible Projects in accordance with Process for Project Evaluation and Selection above.

Each corresponding CLP Business Unit will maintain a register to properly keep track of the use of proceeds for each CAFT. The register will contain the following information, including:

### 2.3.1 Type of Funding Transaction

Key information includes issuer/ borrower entity, transaction date, principal amount of proceeds, maturity date, interest or coupon, and the International Securities Identification Number (ISIN) number (if applicable) in the case of a bond transaction.

### 2.3.2 Allocation of Proceeds

- Name and description of Eligible Projects to which the proceeds of the CAFTs have been allocated to accordance with the CAFF
- Allocation of the proceeds of CAFTs to Eligible Projects
- The balance of unallocated proceeds
- Information regarding temporary investments for unallocated proceeds

CLP is committed to allocating or ear-marking all proceeds from the CAFTs to Eligible Projects on a best effort basis within two years of the CAFT issuance in accordance with the evaluation and selection process set out above.

CLP will monitor the allocation to Eligible Projects and track the net proceeds through its internal accounting system.

Proceeds yet to be allocated towards Eligible Projects may be used for liquidity management purposes of the corresponding CLP Business Unit.

During the life of the CAFT(s) issued, if the designated Projects cease to fulfill the Eligibility Criteria (which may be reviewed during the annual reporting process), the net proceeds will be re-allocated to replacement Projects that comply with the Eligibility Criteria as soon as reasonably practicable.

## 2.4 Reporting

CLP Group will prepare a Climate Action Finance Report on an annual basis. For each CAFT the following will be disclosed:

### 2.4.1 Allocation Reporting

- Identity of the CLP Group Business Unit that has entered into a CAFT;
- Type of CAFT entered into (i.e. Energy Transition Finance Transaction or New Energy Finance Transaction);
- Aggregate amounts of proceeds that has been allocated to Eligible Projects;
- Amount of unallocated proceeds at the reporting end-period (if any);
- Share of proceeds use for financing vs refinancing purposes

### 2.4.2 Impact Reporting

Subject to data availability and where feasible, CLP Group intends to report on the environmental impacts associated with the Eligible Projects funded with the net proceeds of the CAFT(s).

CLP Group intends to reference the core principles and recommendations as outlined in the Harmonised Framework for Impact Reporting for Green Bonds (2024)<sup>19</sup> as published by ICMA where applicable.

The reporting calculation methodologies and any assumptions used will be disclosed in the impact report. The relevant metrics could include the following:

Type of Transaction	Eligible Categories		Potential Impact Indicator(s)
<b>Energy Transition Finance Transaction</b>	Transition Fuel – Coal to Gas		<ul style="list-style-type: none"> <li>• CO<sub>2</sub> emissions intensity of electricity sold (gCO<sub>2</sub>e/kWh)</li> <li>• Estimated CO<sub>2</sub> avoidance achieved (kT)</li> </ul>
<b>New Energy Finance Transaction</b>	Power Generation	Renewable Energy	<ul style="list-style-type: none"> <li>• Renewable energy generated (GWh)</li> <li>• Estimated CO<sub>2</sub> avoidance achieved (kT)</li> </ul>
		Energy Storage	<ul style="list-style-type: none"> <li>• Installed storage capacity (MW / MWh)</li> <li>• Estimated CO<sub>2</sub> avoidance achieved (kT)</li> </ul>
	Transmission and Distribution of electricity	Transmission and Distribution Infrastructure	<ul style="list-style-type: none"> <li>• Increase in non-carbon energy integration capacity (MW) or electricity transmitted from non-carbon sources (MWh/year)</li> <li>• Estimated CO<sub>2</sub> avoidance achieved (kT)</li> </ul>
	Low carbon transport infrastructure	Clean Transportation	<ul style="list-style-type: none"> <li>• Installed charging capacity (MW)</li> <li>• Estimated CO<sub>2</sub> avoidance achieved (kT)</li> </ul>
	Energy Efficiency	End-user energy efficiency/ management	<ul style="list-style-type: none"> <li>• Estimated annual energy savings (MWh)</li> <li>• Estimated CO<sub>2</sub> avoidance achieved (kT)</li> </ul>

A CAFT will be added to or removed from the Climate Action Finance Report as below:

- A CAFT is added to the Climate Action Finance Report when the CAFT was entered into during the reporting period;
- A CAFT is removed from the Climate Action Finance Report when the CAFT has been fully repaid.

19. <https://www.icmagroup.org/sustainable-finance/impact-reporting/green-projects>

## External Review

### Pre-issuance:

CLP has obtained a Second Party Opinion (SPO) from Moody's to assess the CAFF. The SPO, together with the CAFF will be available on CLP's website.

### Post-issuance:

CLP is committed to engage with an appropriate external assurance provider to independently assure the contents of the Climate Action Finance Report as appropriate.

## Framework Review, Updates and Amendments

The CAFF will be in force as long as there are outstanding CAFT(s). CLP will review this CAFF on a regular basis. Such review may result in this CAFF being updated and amended, in which case, CLP intends to obtain an updated SPO as to compliance with the principles set out under section 2. CLP commits to communicating changes with investors via CLP's official website. Future updates to the CAFF, if any, will be published on CLP's website and will replace this CAFF.

## Appendix I: Energy Transition Finance Alignment with CTBG Safeguards and TLP Requirements

Safeguard Components	Climate Transition Bond Guideline	Transition Loan Principles
<b>Issuer level transition strategy</b>	Disclosed in Introduction <sup>20</sup>	
<b>Alignment with sectoral pathway/market-based taxonomies, and/or international and national decarbonisation policy framework</b>	<p>Hong Kong's Climate Action Plan 2050 (CAP2050) sets a clear transition strategy, targeting 60-70% zero-carbon electricity by 2035 and net-zero electricity generation by 2050. CLP has aligned its strategy with the CAP2050 targets, including cessation of coal for daily generation by 2035 and the progressive phase-down of unabated gas thereafter as zero-carbon technologies become technically and commercially viable.</p> <p>On top of this, the Hong Kong Taxonomy for Sustainable Finance Phase 2A will continue to expand in scope in subsequent phases to incorporate additional activities, measures and elements, with a view to further supporting Hong Kong's green and transition objectives, as well as those of the wider region.</p> <p>One of which is natural gas-fired power generation being considered for inclusion, in light of its role as transitional energy sources, which are critical to Hong Kong's decarbonisation plan.</p>	
<b>Analysis on technological and/or economic infeasibility of low-carbon alternatives</b>	<p>As Hong Kong is CLP's core market, GHG emissions from our electricity supply operation constitute a large part of the Group's emissions.</p> <p>Hong Kong's latest energy consumption was 272,656 TJ with only 4,204 TJ from renewable energy power generation in 2023<sup>21</sup>. Hong Kong has a densely populated geography with the lack of space to develop large scale renewable energy power generation. To meet Hong Kong's CAP2050, CLP supports Hong Kong's policy by deploying lower carbon alternatives i.e. natural gas-fired power generation, which is regulated by the Hong Kong Government under the Scheme of Control (SoC) Agreement<sup>22</sup>. It defines CLP's role as an electricity provider and its obligation to provide sufficient and reliable electricity. Accordingly, our transition plan is based on the energy demand forecast in territories currently served by CLP.</p>	
<b>Mitigation of substantial and quantifiable GHG emissions beyond business-as-usual</b>	<p>In formulating the decarbonisation approach for CLP's Hong Kong operation, continuation of the SoC Agreement or an equivalent regulatory framework is assumed throughout the planning timeline.</p> <p>As an electric utility and renewable project developer, one of our levers to decarbonise is by expanding our renewable portfolio. While acknowledging the challenges facing Hong Kong, there is ample growth potential for renewable assets in our markets.</p>	
<b>Disclosure of carbon lock-in risks</b>	<p>For the gas-fired power plants in which CLP has operational control, we assume that they will run until the end of their planned operating period, or the end of their contractual offtake arrangements, unless there is an agreement between CLP, its subsidiaries, and/or its joint venture partner(s), and the respective authorities on the early closure or reduced use of any specific assets. Certain assets may also need to be repurposed and/or to have their operating period extended to provide reserve capacity. In parallel, CLP continues to evaluate emerging technologies that could support the long-term decarbonisation of its gas-fired power plants, including conversion to hydrogen produced by non-carbon emitting sources or carbon capture retrofits before 2050. For instance, a pilot project assessing the feasibility of using hydrogen-blended natural gas at Black Point Power Station in Hong Kong is currently underway. The project will provide valuable insights into the scalability, efficiency and commercial viability of hydrogen.</p>	
<b>Environmental and Social Risk Management</b>	Not applicable	<p>In line with international standards and best practices, CLP defines risk as the effect of uncertainty on objectives. The effect can be positive, negative, or both, and can result in opportunities and threats. CLP aims to identify risks early so threats can be understood, managed, mitigated, transferred or avoided while opportunities can be captured where appropriate. This demands a proactive approach and an effective Group-wide risk management framework.</p>

20. CLP Group level transition strategy is assessed by Moody's in the Net Zero Assessment with assigned score of NZ-2 in 2025

21. [https://www.emsd.gov.hk/filemanager/en/content\\_762/HKEEUD2025.pdf](https://www.emsd.gov.hk/filemanager/en/content_762/HKEEUD2025.pdf)

22. CLP Power's Development Plan, which is part of the Scheme of Control (SoC) Agreement, covers capital projects for the provision and future expansion of electricity supply systems under CLP's operation. It is implemented over a given five-year period, and is subject to the review and approval by the Executive Council of Hong Kong: <https://www.clp.com.hk/en/about-clp/scheme-of-control>