



Autonomous Community of Madrid

Post-Issuance Review – European Green Bond Assessment

European Green Bond Assessment



Key Debt Details

Instrument:	Green 2.487% EUR500m due July 2030 (ISIN ES00001010R3)
Issuer Legal Name:	Comunidad Autónoma de Madrid
LEI:	959800KASH3LCM57Q344
Date of Publication of European Green Bond Factsheet	22 May 2025
Date of Publication of European Green Bond Annual Allocation Report	8 May 2026

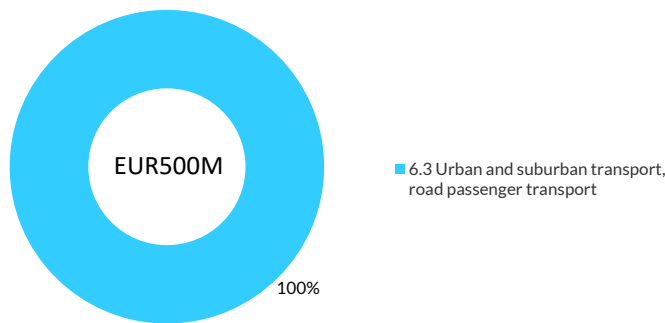
Date assigned	8 May 2026
Framework type	European Green Bond
European Green Bond Assessment	<ul style="list-style-type: none"> ✓ Regulation (EU) 2023/2631 on European Green Bonds and optional disclosures for bonds marketed as environmentally sustainable and for sustainability-linked bonds ✓ Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment

Summary Components

Allocations		Disclosure and Assessment
Intended allocation approach:	Gradual approach	
Use of proceeds (UoP) intended for activities that are environmentally sustainable^a	100% of the bond proceeds	
^a Under Article 3 of Regulation (EU) 2020/852.		

European Green Bond Methodology

Proceeds Allocation



Source: Madrid Annex II European Green Bond Annual Allocation Report 2025
Note: The proceeds allocation is broken down by EU taxonomy economic activity rather than UoP category.

Introductory and Alignment Statements

Sustainable Fitch has assessed the completed European Green Bond (EuGB) allocation report, as laid down in Annex II to Regulation (EU) 2023/2631 of the European Parliament and of the Council. This review represents an independent opinion of the external reviewer, and is to be relied upon only to a limited degree. Sustainable Fitch considers the transaction under this sustainable finance instrument to be aligned with Regulation (EU) 2023/2631 and the UoP to be aligned with Regulation (EU) 2020/852.

Analysts

Denisse Zelaya
+34 93 492 9514
denisse.zelaya@sustainablefitch.com

Approver







Lea Gamsjäger
+34 93 492 9521
lea.gamsjager@sustainablefitch.com

Maria Bazhanova
+44 20 3530 1344
maria.bazhanova@sustainablefitch.com

Media Contact

Tahmina Pinnington-Mannan
+44 20 3530 1128
tahmina.pinnington-mannan@thefitchgroup.com

European Green Bond Assessment Summary

Factsheet Sections	Alignment	Key Drivers
General Information		<ul style="list-style-type: none"> The Autonomous Community of Madrid (Madrid) issued an EuGB on 3 June 2025, in line with Regulation (EU) 2023/2631. It financed fully taxonomy-aligned projects under one category: clean transportation. We conducted a post-issuance external review of Madrid's EuGB allocation report, with a focus on assessing the alignment of the factsheet with Regulation (EU) 2023/2631 and the included economic activities with Regulation (EU) 2020/852 (the EU taxonomy). No conflicts of interest related to Sustainable Fitch providing the external review have been identified. No solicited ratings product has been provided by us to Madrid.
Introductory Statement		<ul style="list-style-type: none"> We have assessed Madrid's EuGB allocation report, in line with Annex II to Regulation (EU) 2023/2631 of the European Parliament and of the Council. This review represents an independent opinion from us as an external reviewer, and is to be relied upon only to a limited degree.
Statement on the Alignment of UoP with Reg. (EU) 2020/852		<ul style="list-style-type: none"> We consider the UoP categories under this transaction to be aligned with Regulation (EU) 2020/852.
Sources, Assessment Methodologies and Key Assumptions		<ul style="list-style-type: none"> Madrid Annex I European Green Bond Factsheet Madrid Annex II European Green Bond Annual Allocation Report 2025 EU Taxonomy Compass Sustainable Fitch European Green Bond Assessment and EU Taxonomy – Methodology (13 December 2024)
Assessment and Opinion		<ul style="list-style-type: none"> The quality of information provided by Madrid is sufficient to perform the post-issuance review. The issuer demonstrates alignment with Article 4 of Regulation (EU) 2023/2631, as the allocation report confirms that bond proceeds have been fully allocated to the entity's taxonomy-aligned capex and opex, falling under category (b) of the gradual approach set out in this article. The flexibility that allows partial non-alignment with the technical screening criteria, as provided for in Article 5 of Regulation (EU) 2023/2631, has not been exercised, as confirmed by the allocation report. The provisions of Article 6 of Regulation (EU) 2023/2631 regarding the allocation of proceeds to financial assets are not applicable, as bond proceeds were allocated directly to capex and opex. The requirement to publish a capex plan, as referred to in Article 7 of Regulation (EU) 2023/2631, does not apply, given that the proceeds were allocated to capex and opex that are taxonomy aligned. The issuer demonstrates alignment with Article 8 of Regulation (EU) 2023/2631, as the allocation report confirms that the bond proceeds were allocated to capex and opex aligned with the technical screening criteria applicable at the time of issuance.
Any Other Information		<ul style="list-style-type: none"> n.a.

Allocations - Disclosure and Assessment of UoP Allocations

UoP – Disclosure

The following table shows the allocations of the net proceeds, equal to EUR500 million, across the UoP category as of 31 December 2025, following the issuance of the EuGB (ISIN ES00001010R3).



UoP category	Environmental objective	EU taxonomy economic activity	Allocation type	Share of allocation in total (aggregated)	Share of project financed by the bond
Clean transportation	EO1	6.3 Urban and suburban transport, road passenger transport	Capex and opex	100%	74%

Source: Madrid EuGB allocation report 2025

Madrid used 100% of allocated proceeds for financing, all of which were environmentally sustainable under Article 3 of Regulation (EU) 2020/852.

The allocation was exclusively focused to the clean transportation category, specifically to the taxonomy-aligned economic activity 6.3 “urban and suburban transport, road passenger transport”, and to projects in Madrid, Spain.

This covered financing of the metro system of Madrid (Metro de Madrid), the municipal transport company of Madrid (EMT) and the regional suburban bus system, including electric buses. These support Madrid’s horizon 2030 strategy, which intends to achieve sustainable mobility through efficient use of transportation; by promoting public transport, and the shift towards electric mobility and low emissions; and by renewing the institutional fleet, and urban and interurban buses.

The allocated amount is broken down as follows: 70% (EUR350 million) to electric metro, 15% (EUR74 million) to light rail, 8% (EUR42 million) for the interurban bus system’s electric buses, and 7% (EUR34 million) for EMT’s urban electric buses, all which corresponds to the year of the EuGB issuance (2025). No proceeds remained temporarily unallocated as of end-2025.

Sub-category	CCY	Amount Allocated in the Reporting Period			Share of Financing Versus Refinancing	Amount Allocated in Total (Aggregated)		
		Amount in millions	Share	CCY		Amount in millions	Share	Share of Financing Versus Refinancing
Electric metro	EUR	350	70%	100%	EUR	350	70%	100%
Light rail	EUR	74	15%	100%	EUR	74	15%	100%
Interurban buses	EUR	42	8%	100%	EUR	42	8%	100%
Urban buses	EUR	34	7%	100%	EUR	34	7%	100%
	EUR	500	100%		EUR	500	100%	

Source: Madrid EuGB allocation report 2025

UoP – Assessment of Alignment With EuGB Factsheet

The following table shows our assessment of the alignment of the projects financed within each UoP with the EuGB factsheet published on 8 May 2026.





UoP	Category	Eligibility criteria from EuGB factsheet	Versus EuGB factsheet	Comments	NACE codes
1 – Clean transportation	Capex and opex	Purchase, financing, leasing, rental and operation of urban and suburban transport vehicles for passengers and road passenger transport	✓	The financed projects related to Madrid’s clean transportation activities meet the relevant technical screening criteria. The primary objective of these projects is to support a modal shift to public transportation, soft mobility and multimodal transport.	H49.31 and H49.3.9

Madrid exclusively allocated EuGB proceeds to projects under economic activity 6.3 “urban and suburban transport, road passenger transport”, fulfilling the substantial contribution criteria for the climate change mitigation objective.

Additionally, it allocated no proceeds to any project where there is partial non-alignment with the technical screening criteria, as Madrid does not exercise the use of a flexibility pocket.

UoP – Assessment Versus EU Taxonomy

The following table shows our assessment of the alignment of the projects financed within each UoP with the EU taxonomy.



Alignment with EU Taxonomy

UoP	Allocation (%)	E/T	Technical Screening Criteria												MS	Full Alignment
			SCC						DNSH							
			EO1	EO2	EO3	EO4	EO5	EO6	EO1	EO2	EO3	EO4	EO5	EO6		
Clean transportation	100	–	✓	–	–	–	–	–	–	✓	–	✓	✓	–	✓	✓
														Overall Instrument Alignment	✓	
														EU Taxonomy Aligned %	100	
														EU Taxonomy Aligned Amount	EUR500 million	

Key

- ✓ Fully aligned with the requirements
- ✗ Not aligned with the requirements
- P Partially aligned with requirements
- No applicable requirements

- UoP** Use of proceeds
- E** Enabling, as per EU Taxonomy Compass
- T** Transitional, as per EU Taxonomy Compass
- SCC** Substantial contribution criteria
- DNSH** Do no significant harm criteria
- MS** Minimum safeguards

Source: Sustainable Fitch



EU Taxonomy Assessment

EU Environmental Objectives: climate change mitigation (EO1); climate change adaptation (EO2); sustainable use and protection of water and marine resources (EO3); transition to a circular economy, waste prevention and recycling (EO4); pollution prevention and control (EO5); protection of healthy ecosystems (EO6)

Use of Proceeds	UoP 1: Clean transportation	
Contribution to EU Environmental Objectives (EO)	EO1	
Applicable Economic Activity	<ul style="list-style-type: none"> 6.3 “urban and suburban transport, road passenger transport” 	
Substantial Contribution Criteria (SCC)	<p>Yes.</p> <p>We consider projects under this UoP to be aligned with the SCC for EO1.</p> <p>Madrid has demonstrated SCC alignment to activity 6.3 as the financed projects related to capex and opex linked to fully electric buses, light-trains and metro transportation. This meets the activity’s SCC, which require it to provide urban or suburban passenger transport with zero direct (tailpipe) CO₂ emissions.</p> <p>Around 70% of the financed capex and opex were for Metro de Madrid, which controls electrified metro transportation. A further 15% were for electrified light rail within the integrated Madrid metro network, providing public transport service to some of Madrid’s urban centre, and to residential and economic activity areas with higher capacity modes of transport.</p> <p>Around 8% were for Madrid’s interurban regional bus system, covering a network of intercity bus companies; and 7% were for the municipal transport company of Madrid (EMT), the global manager of surface mobility in Madrid, which is responsible for the management and operation of urban bus services.</p> <p>The Madrid Annex II European Bond Annual Allocation Report 2025 confirms that 100% of the EUR500 million allocated since issuance, and in the reporting period, was directed to activities that are environmentally sustainable under Commission Delegated Regulation 2021/2139.</p>	
Do No Significant Harm (DNSH)	EO1	n.a.
	EO2	<p>Yes.</p> <p>We consider projects under this UoP to be aligned with the DNSH criteria for EO2.</p> <p>Madrid fulfils the DNSH criteria for EO2 through its climate change vulnerability and risk analysis, which was carried out under the Plan Nacional de Adaptación al Cambio Climático (PNACC; the Spanish national climate change adaptation plan) and the regional energy, climate and air strategy. Madrid’s latest climate risk screening identified relevant physical climate risks for public transport, including changing temperatures, heat waves and heavy precipitation, and the regional government identified risk levels linked to high temperature, ice, snow and rainfall.</p> <p>Madrid notes that Spain carries out periodic climate risk assessments under the PNACC through five-year work programmes, while Metro de Madrid also conducts recurrent risk and materiality assessments. Madrid also states that its regional climate projections, based on the Intergovernmental Panel on Climate Change’s Fifth Assessment Report (AR5) models, cover the periods 2011–2040, 2041–2070 and 2070–2100.</p>
	EO3	n.a.
	EO4	<p>Yes.</p> <p>We consider projects under this UoP to be aligned with the DNSH criteria for EO4.</p> <p>Metro de Madrid and EMT operate under environmental management systems certified according to ISO 14001, which applies to its transport operations and auxiliary activities. Metro de Madrid has environmental procedures and operational actions including waste management, separation, classification and conditioning of waste; control of access to temporary waste storage areas; and identification and management of equipment that may contain chemicals.</p> <p>Madrid has formalised contracts for the scrapping of rolling stock from previous transportation series and auxiliary vehicles, indicating that end-of-life fleet assets are managed within its environmental and waste-management processes.</p> <p>Moreover, the metro implements actions based on integral sustainability, optimising flows of water, energy, materials and waste; and reports the recovery of more than 95% of waste generated, including batteries and electronic products, through improved waste segregation and management.</p>



EU Taxonomy Assessment

EU Environmental Objectives: climate change mitigation (EO1); climate change adaptation (EO2); sustainable use and protection of water and marine resources (EO3); transition to a circular economy, waste prevention and recycling (EO4); pollution prevention and control (EO5); protection of healthy ecosystems (EO6)

	<p>Madrid managed waste in accordance with the waste hierarchy during both the use phase and end-of-life of the fleet, including through reuse and recycling of batteries and electronics.</p> <p>All the above fulfil the DNSH criteria for EO4.</p>
EO5	<p>Yes.</p> <p>We consider projects under this UoP to be aligned with the DNSH criteria for EO5.</p> <p>For road vehicles under category M, Madrid confirmed that Regulation (EU) 2020/740 is implemented in Spain and that tyre suppliers and distributors must comply with the regulation's requirements, including those related to labelling and testing.</p> <p>Madrid also confirmed that road vehicles under category M have tyres that comply with external rolling noise requirements in the highest populated class, and have a rolling resistance coefficient (influencing the vehicle energy efficiency) in the highest two populated classes as set out in Regulation (EU) 2020/740 and verified from the European Product Registry for Energy Labelling.</p>
EO6	n.a.
Minimum Safeguard (MS)	<p>Yes.</p> <p>Article 18 of the EU taxonomy requires minimum safeguards to be implemented in line with the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights (UN GPs), the International Labour Organization core labour standards and rights at work, and the International Bill of Human Rights. Madrid is aligned with the EU taxonomy minimum safeguards through a comprehensive set of policies and governance frameworks implemented across its public operators.</p> <p>Spain aligns with the OECD Guidelines for Multinational Enterprises by promoting responsible business conduct through its regulatory framework, corporate governance standards, and adherence to international sustainability and due diligence principles. Spain is an OECD member and follows the guidelines, so demonstrates this alignment in the incorporation of EU directives and national legislation requiring companies to disclose non-financial information on environmental, social, human rights and anti-corruption matters, such as Law 11/2018 and governance codes that encourage transparency, sustainability, and risk-based due diligence. Spain has established a national contact point in 2001 per the guidelines, under the Secretariat of State for Trade within the Ministry of Economy, Commerce and Business.</p> <p>Spain aligns with the UN GPs as an active UN member state that has endorsed the principles and integrated them into national policy frameworks. This commitment is reflected in its National Action Plan on Business and Human Rights. The plan is structured around the three pillars of the UN GPs: protect, respect and remedy; and includes measures such as promoting corporate human rights policies, integrating due diligence into business operations, strengthening legal and non-judicial grievance mechanisms, and raising awareness among companies and public institutions.</p> <p>At the project level, Metro de Madrid and EMT have both established corporate social responsibility strategies and codes of ethics covering key areas such as integrity, human and labour rights, environmental protection, and responsible supply chain management. Their compliance systems include structured processes for identification, assessment, prevention, mitigation and monitoring of risks related to unethical conduct, harm to users or third parties, and legal non-compliance, including human and labour rights issues. These extend to suppliers through responsible procurement principles. Additionally, Metro de Madrid and EMT are members of the UN Global Compact, so follow its principles on human rights, labour, the environment and anti-corruption.</p>
Full Alignment	

Source: Sustainable Fitch, European Commission delegated regulations 2020/852 and 2021/2139, Madrid EuGB Factsheet, Madrid EuGB allocation report 2025

Appendix A: Other Services Sustainable Fitch has Provided to the Assessed Entity

European Green Bond Assessment

With this report, Sustainable Fitch is providing a European Green Bond Assessment to the assessed entity, as identified on page 1.

Sustainable Fitch has also provided the following services or products to the same entity:

- Primary Market Review dated 10 April 2026. Unsolicited.
- Framework Ratings dated March 2026 and February 2026. Unsolicited.

Sustainable Fitch has not provided any other service or product.

SOLICITATION STATUS

The Post-Issuance Review was solicited and assigned or maintained by Sustainable Fitch at the request of the entity.

A Sustainable Fitch Analytical Product provides an assessment of the Environmental, Social and/or Governance qualities of an issuer and/or its financial instruments or securities. Sustainable Fitch Analytical Products include without limitation ratings, scores, second-party opinions and other assessments, opinions and data-related products, among other Analytical Products. A Sustainable Fitch Analytical Product is not a credit rating. Analytical Products are provided by Sustainable Fitch, a Fitch Solutions company, and an affiliate of Fitch Ratings. Sustainable Fitch has established specific policies and procedures intended to avoid creating conflicts of interest and compromising the independence or integrity of Fitch Ratings' credit rating activities and Sustainable Fitch's Analytical Product generation activities. For a description of the methodology, limitations and disclaimers relating to Sustainable Fitch's Analytical Products, please use this link: www.sustainablefitch.com.

Please note that individuals identified in any Analytical Product report or press release are not responsible for the opinions stated therein and are named for contact purposes only. A report regarding an Analytical Product is neither a prospectus nor a substitute for the information assembled, verified and presented to investors by the issuer and its agents in connection with the sale of financial instruments and securities. Sustainable Fitch's Products are not considered investment advice and they are not and should not be considered as a replacement of any person's own assessment of the sustainability factors related to a financial instrument or an entity. Sustainable Fitch does not represent, warrant or guarantee that an Analytical Product will fulfil any of your or any other person's particular purposes or needs. Sustainable Fitch does not recommend the purchase or sale of financial instruments or securities or give investment advice or provide any legal, auditing, accounting, appraisal or actuarial services. Sustainable Fitch's Analytical Products are not an opinion as to the value of financial instruments or securities. Sustainable Fitch does not audit or verify the accuracy of the information provided to it by any third party for the purpose of issuing an Analytical Product, including without limitation issuers, their representatives, accountants and legal advisors and others. Sustainable Fitch does not represent, warrant or guarantee the accuracy, correctness, integrity, completeness or timeliness of any part of the Analytical Product. The information in an Analytical Product report is provided "as is" without any representation or warranty of any kind, and Sustainable Fitch does not represent or warrant that the report or any of its contents will meet any of the requirements of a recipient of the report. Sustainable Fitch does not provide a limited or reasonable assurance on any information presented in an Analytical Product report.

Sustainable Fitch receives fees from entities and other market participants who request Sustainable Fitch Analytical Products in relation to the analysis conducted to assign a rating, score, opinion or an assessment to a given financial instrument and/or entity, as well as the distribution of data. The assignment, publication, or dissemination of a Sustainable Fitch Analytical Product shall not constitute a consent by Sustainable Fitch to use its name as an expert in connection with any registration statement filed under the United States securities laws, the Financial Services and Markets Act of 2000 of the United Kingdom, or the securities laws of any particular jurisdiction.

Any ratings, second-party opinions, assessments, commentaries or other reports and products issued by Sustainable Fitch are not intended to be and shall not be relied upon or used by any users located in India in relation to securities listed or proposed to be listed on Indian stock exchanges.

Sustainable Fitch Analytical Products offered to clients in Australia. Analytical Products in Australia are available only to wholesale clients (as defined in section 761G and 761GA of the Corporations Act (Cth) (the "Act")) in Australia. Information related to Analytical Products published by Sustainable Fitch is not intended to be used by persons who are retail clients within the meaning of section 761G and 761GA of the Act ("Retail Clients") in Australia. No one shall distribute, disclose or make references to any information related to Analytical Products in a manner which is intended to (or could reasonably be regarded as being intended to) influence a Retail Client in making a decision in relation to a particular financial product (as defined in the Act) or class of financial products, unless required to do so by law to meet continuous disclosure obligations. No one shall make reference to any Sustainable Fitch Analytical Product information in any publication, promotional material, disclosure document, correspondence, website, or any other venue that may be accessed by clients and investors who are Retail Clients in Australia (except in the circumstances as permitted by law). Sustainable Fitch does not hold an Australian financial services license to provide general financial product advice and the Analytical Products are provided subject to the conditions of the [class no-action position to second party opinion providers issued by the Australian Securities & Investments Commission on 14 June 2024](#). Except as disclosed above or on our website, there is no conflict of interest that is material that may arise in providing the views and opinions here. For Industry-accepted framework and standards relevant to this Analytical Product, please refer to information above and in the methodology.

Copyright © 2026 by Sustainable Fitch, Inc., Sustainable Fitch Limited and their subsidiaries. 300 West 57th Street, New York, NY 10019. Telephone: 1-800-753-4824, (212) 908-0500. Reproduction or retransmission in whole or in part is prohibited except by permission. All rights reserved.