



Independent Practitioner’s Limited Assurance Report to The Berkeley Group Holdings plc

Report on The Berkeley Group Holdings plc’s allocation of proceeds from the green bond and green term loan as at 30 April 2025

Conclusion

We have performed a limited assurance engagement on whether the Selected Information in The Berkeley Group Holdings plc’s (“Berkeley” or the “Company”) Green Finance Framework Allocation and Impact Report 2025 (the “Report”) for the year ended 30 April 2025 has been properly prepared in accordance with Berkeley’s Green Finance Framework as set out at www.berkeleygroup.co.uk/-/media/migration/berkeley-group/about-us/investors/debt-investors/berkeley-group_green-finance-framework_2022.ashx?rev=464bf0b02b1f401cb60037f06e5c3a7f&hash=F7EEB1858382617A2FB23E52222B3E69 (the “Reporting Criteria”). The information within the Report that was subject to assurance is indicated with the symbol “Δ” (the “Selected Information”) (and is also listed in Appendix A).

Berkeley’s Green Finance Framework requires Berkeley to prepare an annual allocation and impact report which sets out the allocation of the proceeds from:

- the £400m green bond with a maturity in August 2031; and
- the £260m green term loan with a maturity in February 2029

(together the “Green Finance Instruments”) to Eligible Green Assets (“EGAs”), as defined in the Reporting Criteria. The Report has been prepared to meet these requirements. The Reporting Criteria sets out the basis by which Berkeley has determined whether assets meet the criteria to qualify as EGAs, including specifying the types of eligible spend and the period during which it can be incurred.

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the Selected Information has not been properly prepared, in all material respects, in accordance with the Reporting Criteria.

Our conclusion is to be read in the context of the remainder of this report, in particular the “Inherent limitations in preparing the Selected Information” and “Intended use of our report” sections below.

Our conclusion on the Selected Information does not extend to other information that accompanies or contains the Selected Information and our assurance report (hereafter referred to as “Other Information”). We have not performed any procedures with respect to the Other Information.

Basis for conclusion

We conducted our engagement in accordance with International Standard on Assurance Engagements (UK) 3000 *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* (“ISAE (UK) 3000”) issued by the Financial Reporting Council (“FRC”). Our responsibilities under that standard are further described in the “Our responsibilities” section of our report.

We have complied with the Institute of Chartered Accountants in England and Wales (“ICAEW”) Code of Ethics, which includes independence and other ethical requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour, that are at least as demanding as the applicable provisions of the International Ethics Standards Board for Accountants (“IESBA”) *International Code of Ethics for Professional Accountants (including International Independence Standards)*.



Our firm applies International Standard on Quality Management (UK) 1 *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements* (“ISQM (UK) 1”), issued by the FRC, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Inherent limitations in preparing the Selected Information

The nature of non-financial information; the absence of a significant body of established practice on which to draw; and the methods and precision used to determine non-financial information, allow for different, but acceptable, evaluation and measurement techniques and can result in materially different measurements, affecting comparability between entities and over time.

The Reporting Criteria has been developed to assist Berkeley in determining the allocation of the proceeds from the Green Finance Instruments. As a result, the Selected Information may not be suitable for another purpose.

The assets that meet Berkeley’s definition of EGAs, as set out in section 2.1 of the Reporting Criteria, are determined by Berkeley. Our work is limited to assessing whether the proceeds of the Green Finance Instruments have been allocated to assets that meet Berkeley’s definition of EGAs, as set out in the Reporting Criteria. We have not performed procedures to assess, and so our work does not provide any assurance over:

- whether the EGAs were only invested in as a consequence of Berkeley obtaining the Green Finance Instruments;
- whether Berkeley did not also use other cash flows to invest in assets that they would not be permitted to use the Green Finance Instruments proceeds for;
- the appropriateness of the eligibility criteria set by Berkeley which lead to the assets being classified as EGAs, nor whether the EGAs continue to meet that eligibility criteria on an ongoing basis; nor
- whether there is a correlation between the classification as EGAs and any actual environmental impact of investing in the EGAs.

Directors’ responsibilities

The Directors of Berkeley are responsible for:

- designing, implementing and maintaining internal controls relevant to the preparation and presentation of the Selected Information that is free from material misstatement, whether due to fraud or error;
- selecting and developing suitable Reporting Criteria for preparing the Selected Information;
- properly preparing the Selected Information in accordance with the Reporting Criteria;
- the contents and statements contained within the Report and the Reporting Criteria; and
- implementing procedures designed to ensure that personnel involved with the preparation and presentation of the Report are properly trained, systems are properly updated and that any change in reporting processes relevant to the Selected Information encompass all significant business units.



Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the Selected Information is free from material misstatement;
- forming an independent limited assurance conclusion, based on the procedures we have performed and the evidence we have obtained; and
- reporting our conclusion to Berkeley.

Summary of the work we performed as the basis for our conclusion

We exercised professional judgment and maintained professional scepticism throughout the engagement. We planned and performed our procedures to obtain evidence that is sufficient and appropriate to obtain a meaningful level of assurance over the Selected Information to provide a basis for our limited assurance conclusion. Planning the engagement involves assessing whether Berkeley's Reporting Criteria are suitable for the purposes of our limited assurance engagement. Our procedures selected depended on our judgement, on our understanding of the Selected Information and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise.

In carrying out our engagement, we performed procedures which included:

- conducting interviews with, and obtaining documentation from, the Company's management and key staff responsible for the use of proceeds of the Green Finance Instruments, and those responsible for the preparation of the Selected Information, to obtain an understanding of the key processes, systems and controls in place over the allocation of proceeds of the Green Finance Instruments and over the preparation of the Selected Information, but did not include evaluating the design of controls, obtaining evidence about their implementation or testing their operating effectiveness;
- inspecting documentation to confirm that the EGAs had been considered by management with reference to the eligibility criteria (as set out in the Reporting Criteria) and approved by Berkeley's Green Finance Committee as meeting those eligibility criteria;
- comparing the total Green Finance Instruments funds received by the Company with those allocated to the EGAs (as defined in the Reporting Criteria);
- gaining an understanding of the information sources used by the Company to determine the amount of proceeds allocated, in GBP, to EGAs;
- performing limited substantive testing including:
 - agreeing a selection of items to source documentation (i.e. planning application documents and Energy Performance Certificates (EPCs)) to support the categorisation of funds spent on the EGAs in accordance with the Reporting Criteria;
 - assessing whether the funds were allocated within the period specified in the Reporting Criteria;
 - assessing whether the amount financed by other loans and bonds, if any, has been excluded from the Selected Information; and
- reading the Report with regard to the Reporting Criteria and for consistency with our findings over the Selected Information.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level



of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Intended use of our report

Our report has been prepared for Berkeley solely in accordance with the terms of our engagement. We have consented to the publication of our report on Berkeley's website at <https://www.berkeleygroup.co.uk/investors/debt-investors> for the purpose of Berkeley showing that it has obtained an independent assurance report in connection with the Selected Information.

Our report was designed to meet the agreed requirements of Berkeley determined by Berkeley's needs at the time. Our report should not therefore be regarded as suitable to be used or relied on by any party wishing to acquire rights against us other than Berkeley for any purpose or in any context. Any party other than Berkeley who obtains access to our report or a copy and chooses to rely on our report (or any part of it) will do so at its own risk. To the fullest extent permitted by law, KPMG LLP will accept no responsibility or liability in respect of our report to any other party.

Andy Kierney
for and on behalf of KPMG LLP
Chartered Accountants
15 Canada Square
London
E14 5GL
24 July 2025

The maintenance and integrity of Berkeley's website is the responsibility of the Directors of Berkeley; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported Selected Information, Reporting Criteria or Report presented on Berkeley's website since the date of our report.



Appendix A –Selected Information

The underlying selected information as at 30 April 2025 that constitutes the Selected Information is listed below. The information in this Appendix needs to be read together with the attached limited assurance report and the Reporting Criteria.

| Underlying Selected Information | Selected Information |
|---|-----------------------------|
| Total proceeds allocated against refinanced Eligible Green Assets | £660m |