EBRD Unified Priority Group Definitions (PGD) Table

Under the EBRD intermediated finance programmes in Ukraine, within the EU supported UIF (*as defined below*) and complementary initiatives, the priority group of Sub-Borrowers includes: (i) residential[1] and sole proprietor Sub-Borrowers that are priority persons (as defined below) and (ii) MSMEs that are majority-owned (more than 50%) and/or led by such persons (meaning having such persons in the highest executive positions), employ priority persons constituting at least 10% of their permanent staff (except for the VRW Category 3, for which the minimum threshold is 5%), or operate a business providing services to or working with priority persons where these individuals make up more than 10% of their clients, revenue, or residents (for housing associations).

Definitions & Abbreviations

EBRD – European Bank for Reconstruction and Development.
EC – European Commission.
ERW – Enterprise Renaissance Window (a thematic window under the SMECI Programme for Sub-Borrowers that suffered war-related asset destruction and/or losses).
ESSF – EBRD Energy Security Support Facility.
EU – European Union.
FTE – Full-time employee (permanent staff).
HOA – Housing association (*ОСББ*).
IDP – Internally Displaced Person, as defined in Table 1 below.
MSME – Micro, small and medium enterprise.
Overall Operational Management Responsibility means, in relation to an individual/natural person and an enterprise, that individual/natural person holding the highest executive role at the enterprise (which will generally be the Chief Executive Officer, Director, General Manager or Managing Director, or an equivalent position).
PC – Project Consultant (EBRD-appointed consultant supporting Programme implementation).
PFI – Partner Financial Institution (a bank or financial institution through which EBRD channels credit facilities to Sub-Borrowers).
Sub-Borrower – a commercial entity, a private entrepreneur, an individual or an individual household or a housing association meeting the applicable eligibility requirements that intend to borrow or have borrowed any amount from an EBRD PFI under EBRD intermediated facilities.
SMECI — EU-EBRD SME Competitiveness and Inclusion Programme in Eastern Partnership (publicly known as "EBRD-EU4Business Credit Line with Incentives").
UIF — Ukraine Investment Framework.
Verified Damage — the value of war-related losses or damages, as verified by the PFI and reviewed by EBRD or PC.
VRW — Veterans and War-Affected Persons Reintegration Window (a thematic window under the SMECI Programme for Sub-Borrowers reintegrating war veterans and their family members).

[1] An individual or group of individuals (inter alia acting as a housing association, or other equivalent body, in each case, which represents the interests of residents) recognised and registered under the laws of Ukraine as the residents in or owners of or with access to the dwelling or the building in Ukraine

Table 1: Priority Group Definitions and Supporting Documents

<table>
<tr><th>#</th><th>Priority Persons / Sub-Borrower Category</th><th>Definition</th><th>Supporting Documents[2]: business entities / sole proprietors</th><th>Supporting Documents: Residential Sub-Borrowers (natural persons) / HOAs</th></tr>
<tr><td rowspan="2">1</td><td rowspan="2">Sub-Borrowers that suffered asset destruction and/or losses due to the war on Ukraine</td><td rowspan="2">Sub-Borrowers that have been relocated or suffered destruction and/or losses of assets due to Russia’s war of aggression, provided that the Verified Damage equals or exceeds 15% (for MSMEs and sole proprietors) / 10% (for Residential Sub-Borrowers under ESSF) of the eligible Sub-Loan(s) to such Sub-Borrower provided under the Programme.</td><td>Self-Declaration of the Verified Damage Amount from the Sub-Borrower / Sub-Borrower's authorised senior management representative.</td><td>Self-Declaration of the Verified Damage Amount from the Sub-Borrower that is a natural person or a Housing Association.</td></tr>
<tr><td colspan="2"><u>Common to all Sub-Borrower types:</u>
• (mandatory) photographic evidence confirming the asset condition after the war damage, indicating, where feasible, unique identifiers (e.g., serial numbers, VIN codes, etc., depending on the type of asset), unless direct access to the damaged assets is not possible or would endanger the safety of the relevant Sub-Borrower or its staff (e.g., assets are located in occupied territories or areas affected by active hostilities), and in which case, evidence showing such lack of direct access shall be submitted to the extent possible; <u>and</u>
At least one, but preferably all of the below supporting documents that are available — to confirm the war damage event and the Verified Damage amount:
• latest available third-party valuation reports confirming the asset value before and/or after the war damage; and/or
• estimates, quotations, invoices and other documents of a similar nature evidencing the cost of repairs or restoration required to restore the damaged asset; and/or;
• inspection reports of Ukrainian authorities with the indication of damage (destruction) causes; and/or
• photographic evidence confirming the value and condition of the relevant asset(s) before the damage; and/or
• extract from the relevant register(s) of the war damaged assets generally used in Ukraine; and/or
• any loss compensation claims to insurance provider(s) or courts; and/or
• any extracts from the Unified Register of Pre-Trial Investigations confirming registration of criminal proceedings related to the war damage; and/or
• the full text of any court ruling(s) concerning the war damage; and/or
• documents evidencing the write-off / disposal of asset(s) or historical financial documents, including purchase receipts, service acts, depreciation schedules, and/or investment records that detail the acquisition cost, depreciation, and any improvements made to the assessed war damaged assets or costs of relocation of Sub-Borrowers’ assets from War Affected Territories[3]; and
• any other supporting evidence or documents that EBRD / PC may reasonably request.</td></tr>
</table>

[2] Templates for self-declarations, written representations and commitments as well as reference documents can be obtained from PFIs.

[3] Please see this definition for Sub-Borrower category #5 below. To clarify, each Sub-Borrower from the War Affected Territories shall be assigned *either* to (i) category #1 if they have provided relevant documents confirming the Verified Damage, or (ii) category #5 if they have not incurred any direct war-related losses, or were unable to quantify them by providing relevant evidence to confirm the Verified Damage under Sub-Borrower category #1.

<table>
<tr><th>#</th><th>Priority Persons / Sub-Borrower Category</th><th>Definition</th><th>Supporting Documents[2]: business entities / sole proprietors</th><th>Supporting Documents: Residential Sub-Borrowers (natural persons) / HOAs</th></tr>
<tr><td rowspan="2">2</td><td rowspan="2">War Veterans and their Family Members</td><td rowspan="2">“War Veteran” has the meaning given to that term in the law “on the Status of War Veterans, Guarantees of their "War Veteran" has the meaning given to that term in the law “on the Status of War Veterans, Guarantees of their Social Protection”[4], provided the war veteran would have been eligible for such status based on his/her actions defending Ukraine or disabilities as a result of the war occurred from 2014 onwards; and excluding the “veterans of labour” category that is envisaged under this law when it was originally adopted in 1993.
"Family Member" (of a War Veteran) means a spouse, son/daughter, a sibling, and/or parents.</td><td><u>For business entities and sole proprietors with employees:</u>
• a written representation from the Sub-Borrower's authorised senior management representative confirming the last 6 months average total number of FTEs and number of FTEs eligible for War Veteran and/or War Veteran Family Member status; and
• a written letter of commitment (certified by MSME senior management) to implement veteran friendly measures and veteran reintegration policy; and
• a list of FTEs, indicating a document type that confirms War Veteran and/or War Veteran Family Member status (please see below) and/or Single Social Contribution (ЄСВ) Report (SSCR) (line No. 101) and Appendices 1 thereto for each month of the quarter with the list of employees.
<u>For sole proprietors without employees:</u> please see below.</td><td><u>For HOAs:</u>
• a written representation from the Sub-Borrower’s authorized representative confirming that War Veterans and/or War Veteran Family Members make up more than 10% of residents.

<u>For natural persons:</u> please see below.</td></tr>
<tr><td colspan="2"><u>Common to all Sub-Borrower types:</u>
Any of the below relevant certificates to prove such legal status:
• a participant in hostilities (посвідчення учасника бойових дій);
• a person with a disability as a result of war (особи з інвалідністю внаслідок війни);
• a war participant (учасника війни);
• a family member of a deceased war veteran (члена сім’ї загиблого (померлого) ветерана війни);
• a family member of a deceased Defender of Ukraine (члена сім’ї загиблого (померлого) Захисника чи Захисниці України);
• an injured participant in the Revolution of Dignity (постраждалого учасника Революції Гідності).

Where the Sub-Borrower claims status as a family member, a document confirming the family relationship (e.g., marriage certificate, birth certificate) may also be required at PFI’s discretion.</td></tr>
</table>

[4] https://zakon.rada.gov.ua/laws/show/3551-12#Text

<table>
<tr><th>#</th><th>Priority Persons / Sub-Borrower Category</th><th>Definition</th><th>Supporting Documents[2]: business entities / sole proprietors</th><th>Supporting Documents: Residential Sub-Borrowers (natural persons) / HOAs</th></tr>
<tr><td rowspan="2">3</td><td rowspan="2">IDP or Returnee</td><td rowspan="2">“IDP” has the meaning given to that term in the law “on Ensuring the Rights and Freedoms of Internally Displaced Persons”[5] where “IDP” is defined as a citizen of Ukraine, a foreigner or a stateless person who is legally present on the territory of Ukraine and has the right for the permanent residence in Ukraine, who was forced to leave or abandon his/her/their place of residence as a result of or in order to avoid the negative consequences of the armed conflict, temporary occupation, widespread violence, human rights violations and natural or man-made emergencies.

“Returnee” has the meaning given to that term in the law “on Ensuring the Rights and Freedoms of Internally Displaced Persons”, where “Returnee” is identified as an individual who was previously an IDP and has voluntarily returned to his/her/their place of habitual residence after the situation that caused their displacement has improved or resolved.

All in relation to the war on Ukraine occurred from 2014 onwards.</td><td><u>For business entities and sole proprietors with employees:</u>
• a written confirmation from the Sub-Borrower’s authorised senior management representative confirming the last 6 months average total number of FTEs and number of FTEs eligible for IDP or Returnee status; and
• a list of FTEs, indicating a document type that confirms IDP or Returnee status; and/or Single Social Contribution (“ЄСВ”) Report (“SSCR”) (line No. 101) and Appendices 1 thereto for each month of the quarter with the list of employees. If the SSCR is not available (e.g., in mid-calendar quarter), the Labour Report (“Звіт з праці”);

<u>For sole proprietors without employees:</u> please see below.</td><td><u>For HOAs:</u>
a written representation from the Sub-Borrower’s authorized representative confirming that IDPs and/or Returnees make up more than 10% of residents.

<u>For natural persons:</u> please see below.</td></tr>
<tr><td colspan="2"><u>Common to all Sub-Borrower types:</u>
• For IDPs: Status of an internally displaced person and IDP certificate (довідка ВПО); or
• For Returnees: a copy of the decision on withdrawal or invalidation of the IDP certificate (on the grounds of return to the abandoned place of permanent residence).</td></tr>
</table>

[5] https://zakon.rada.gov.ua/laws/show/en/1706-vii?lang=uk#Text

<table>
<tr><th>#</th><th>Priority Persons / Sub-Borrower Category</th><th>Definition</th><th>Supporting Documents[2]: business entities / sole proprietors</th><th>Supporting Documents: Residential Sub-Borrowers (natural persons) / HOAs</th></tr>
<tr><td rowspan="2">4</td><td rowspan="2">Persons with Disability</td><td rowspan="2">“Disability” means long-term physical, mental, intellectual, or sensory impairment which in interaction with various barriers may hinder a person’s full and effective participation in society on an equal basis with others[6].</td><td><u>For business entities and sole proprietors with employees:</u>
• a written confirmation from the Sub-Borrower’s authorised senior management representative confirming the last 6 months average total number of FTEs and number of FTEs eligible for Persons with Disability status.

<u>For sole proprietors without employees:</u> please see below.</td><td><u>For HoAs:</u>
a written representation from the Sub-Borrower’s authorized representative confirming that Persons with Disability make up more than 10% of residents.

<u>For natural persons:</u> please see below.</td></tr>
<tr><td colspan="2"><u>Common to all Sub-Borrower types:</u>
Confirmation of status of a person with a disability (“Посвідчення особи з інвалідністю” or “Пенсійне посвідчення з інвалідності”).</td></tr>
<tr><td rowspan="2">5</td><td rowspan="2">Sub-Borrowers from the War Affected Territories</td><td rowspan="2">A Residential Sub-Borrower located in a War Affected Territory of Ukraine or an MSME that has relocated substantially all of its business operations from a War Affected Territory or operates in a War Affected Territory of Ukraine.

“War Affected Territories” means, at any relevant time, any territories of Ukraine that have most suffered from the Russia’s war of aggression, comprising basic administrative units of Ukraine (communities, or “terytorialna hromada”) in which military operations are (were) conducted or territories temporarily occupied by the Russian Federation, as identified by the government of Ukraine:
- in line with Resolution #1364 dated 6 December 2022 on “Some Issues of Formation of the List of Territories in which Military Operations are (were) Conducted or</td><td>a written confirmation from the Sub-Borrower (for sole proprietors) / Sub-Borrower’s authorised senior management representative confirming the Sub-Borrower’s operational location in communities listed in the Order No. 376.</td><td>a written confirmation from the Sub-Borrower (for individuals) / Sub-Borrower’s authorized representative (for HOAs) confirming the Sub-Borrower’s location in communities listed in the Order No. 376.</td></tr>
<tr><td colspan="2"><u>Common to all Sub-Borrower types:</u>
Supporting documents (business or real estate register extract, rental agreement, resident address confirmation, etc.)[10] confirming the Sub-Borrower’s location in communities listed in the Order No. 376 of the Ministry for Development of Communities and Territories of Ukraine “On Approval of the List of Territories in which Military Operations are Conducted (Were Conducted) or Temporarily Occupied by the Russian Federation” dated 28 February 2025.</td></tr>
</table>

[6] See further info here: Disability | European Foundation for the Improvement of Living and Working Conditions (europa.eu)
[10] Depending on the Sub-Borrower type. EBRD / PC may reasonably request additional supporting documents on a case-by-case basis.

#	Priority Persons / Sub-Borrower Category	Definition	Supporting Documents[2]: business entities / sole proprietors	Supporting Documents: Residential Sub-Borrowers (natural persons) / HOAs
		Temporarily Occupied by the Russian Federation"[7]; and - listed in the Order No. 376 dated 28 February 2025 "On Approval of the List of Territories in which Military Operations are Conducted (Were Conducted) or Temporarily Occupied by the Russian Federation"[8] or other official Ukrainian government sources listing such war affected territories that may replace the mentioned documents in the future; and as well as first-level administrative division (regions, or "oblast") in which the above referred communities are located, except for Kyiv, Zhytomyr, and Odesa oblasts[9].		
6	**Women-led MSMEs**	**"Undertaking Led by a Woman"** means a company, enterprise, firm, business, sole proprietor, or other legal entity where: (a) either: (i) the Overall Operational Management Responsibility is held by a woman (or women); or (ii) the percentage of the entity's shares (if applicable) that are directly owned, by vote and/or value, by a woman or women, is greater than 50%; or (b) the entity satisfies the criteria for a "women-led" or "women-owned" business prescribed by the law or regulations of Ukraine or published by the Ukrainian local authority.	**For business entities and sole proprietors with employees:** • a written confirmation from the Sub-Borrower's authorised senior management representative confirming that either (i) the Sub-Borrower's Operational Management Responsibility is held by a woman/women or (ii) the percentage of the entity's shares (if applicable) that are directly owned, by vote and/or value, by a woman or women, is greater than 50%; and • the Sub-Borrower's Operational Management Structure confirmed by the Sub-Borrower's authorised senior management representative; and/or • an extract from the Unified State Register (*ЄДР*) confirming the ownership structure of the Sub-Borrower. **For sole proprietors without employees:** an extract from the Unified State Register.	**N/A**

[7] https://zakon.rada.gov.ua/laws/show/1364-2022-%D0%BF#Text
[8] https://zakon.rada.gov.ua/laws/show/z0380-25#Text
[9] For the avoidance of doubt, the communities within those regions in which military operations are or were conducted (excl. Kyiv), or territories temporarily occupied by the Russian Federation, are considered War Affected Territories in line with the above provisions (e.g., Bucha in Kyiv oblast).

#	Priority Persons / Sub-Borrower Category	Definition	Supporting Documents[2]: business entities / sole proprietors	Supporting Documents: Residential Sub-Borrowers (natural persons) / HOAs
7	**Youth-led MSMEs**	**"Undertaking Led by a Youth"** means a company, enterprise, firm, business, sole proprietor, or other legal entity where: (a) the Overall Operational Management Responsibility for which is held by a person (or persons) under the age of 35; or (b) the percentage of the entity's shares (if applicable) owned by person(s) under the age of 35 own(s) is over 50%.	**For business entities and sole proprietors with employees:** • a written confirmation from the Sub-Borrower's authorised senior management representative confirming that either (i) the Sub-Borrower's Operational Management Responsibility is held by a young person(s) or (ii) the percentage of the entity's shares (if applicable) that are directly owned, by vote and/or value, by a young person(s), is greater than 50%; and • the Sub-Borrower's Operational Management Structure confirmed by the Sub-Borrower's authorised senior management representative; and/or • an extract from the Unified State Register confirming the ownership structure of the Sub-Borrower. **For sole proprietors without employees:** an extract from the Unified State Register.	**N/A**
8	**Sub-Borrowers that lost their assets due to forfeiture/mobilization for state needs during martial law**	Sub-Borrowers whose assets were forfeited / mobilized by the Ukrainian Armed Forces or other Authorities for state needs during martial law and that have not received compensation for the value of such forfeited / mobilized property in any form within 12 months after it took place.	• A written confirmation from the Sub-Borrower **(for sole proprietors)** / Sub-Borrower's authorised senior management representative including: - the list of mobilized assets and, inter alia, indicating the date when such forfeiture / mobilization took place; - book value of such assets; and - Confirmation that Sub-Borrower has not received compensation for the value of such forfeited / mobilized property in any form within 12 months after it took place. • Act of acceptance and transfer of mobilised assets, signed between the Sub-Borrower and relevant military/state authorities.	**N/A**

#	Priority Persons / Sub-Borrower Category	Definition	Supporting Documents[2]: business entities / sole proprietors	Supporting Documents: Residential Sub-Borrowers (natural persons) / HOAs
9	**Small Farms**	An MSME registered in the Ukrainian State Agrarian Registry (*ДАР*) and Unified State Register of Ukraine which fulfils the following criteria: - a farm or MSME registered in the Ukrainian State Agrarian Registry and legal entity Register; and - a farm or MSME operating in the agricultural sector under Ukrainian law, with owned and/or leased land area less than 2,000 hectares; and - is in compliance with environmental and animal welfare standards; There are no restrictions on the number of livestock units managed by the beneficiaries. UIF Guidance Note, Annex C checklists requirements should be followed for agriculture/food processing sectors lending.	• A written confirmation from the Sub-Borrower **(for sole proprietors)** / Sub-Borrower's authorised senior management representative confirming the total area of owned and/or leased area is less than 2,000 hectares. • Extract from the State Agrarian Registry confirming the registration and total area of utilized land.	**N/A**
10	**Start-ups**	Sub-Borrower that is compliant with the EU definition for MSMEs that is at the initial stage of its life cycle (not older than 3 years), which is characterised by an innovative stance, a potential for rapid growth, need for external funding, and vulnerability.	Extract from the Unified State Register confirming the Sub-Borrower’s registration date.	**N/A**
11	**Micro Enterprises**	A company with fewer than 10 employees and an annual turnover below EUR 2 million or a total balance sheet of below EUR 2 million.	• **(for business entities)** financial statements (audited, if available) for the past 3 years; or, if the Sub-Borrower has been registered for less than 3 years, for all periods available. • **(for sole proprietors)** tax declarations for the past 3 years; or, if the Sub-Borrower has been registered for less than 3 years, for all periods available.	**N/A**

#	Priority Persons / Sub-Borrower Category	Definition	Supporting Documents[2]: business entities / sole proprietors	Supporting Documents: Residential Sub-Borrowers (natural persons) / HOAs
12	**Companies Supporting Humanitarian De-Mining Activities**	Sub-Borrowers that receive Sub-Loans under the respective EBRD supported programme to finance the following investments/activities: - Investment by agri-food businesses as well as farmers in conducting and/or sub-contracting different de-mining activities (inter alia non-technical survey, technical survey, and/or clearance). - Financing schemes for small farmers offering to off-set loss of income where large parts of land are confirmed hazardous, enabling farmers to remain on their farms and make a living on their land even if not at full productive capacity. Such schemes should contribute towards progressive land release on affected holdings where possible. - Financing schemes for agri-business to incentivise de-mining of owned or leased land, in order to boost land use and production. - Investments into Ukrainian innovation, digitalisation, modern technologies and in innovation in the de-mining sector, such as the use of drones and other technologies for non-technical and technical surveys. - Financing schemes to enhance capacities to produce demining equipment in Ukraine, stimulating industry to manufacture needed equipment.	Extract from the signed loan agreement indicating the use of proceeds.	**N/A**

Table 2: Eligibility for Additional Investment Incentives by Priority Group Category

<table>
<tr><th>#</th><th>Priority Persons / Sub-Borrower Category</th><th>MSME Sub-Borrowers Eligible for Additional Investment Incentives under SMECI (Yes/No)</th><th>Residential Sub-Borrowers Eligible for Investment Incentives under ESSF (Yes/No)</th></tr>
<tr><td>1</td><td>Sub-Borrowers that suffered asset destruction and/or losses due to the war on Ukraine</td><td>YES (up to 15% of additional investment incentives; the maximum incentive amount is 30% of eligible SMECI sub-loan). Specific criteria and conditions for MSME Sub-Borrowers in this category to receive additional investment incentives under the Enterprise Renaissance Window (“ERW”) are outlined in the EaP SMECI Policy Statement.</td><td rowspan="5"><u>Common requirements (applicable to Sub-Borrower categories 1-5):</u>
YES (up to 10% additional incentives; maximum 30% of eligible ESSF sub-loan). Specific criteria and conditions are outlined in the ESSF Policy Statement.</td></tr>
<tr><td>2</td><td>War Veterans and their Family Members</td><td>YES (up to 15% of additional investment incentives; the maximum incentive amount is 30% of eligible SMECI sub-loan). Specific criteria and conditions for MSME Sub-Borrowers reintegrating war veterans and their family members to receive additional investment incentives under the Veterans and War-Affected Persons Reintegration Window (“VRW”) are outlined in the EaP SMECI Policy Statement.
!IMPORTANT!
To be eligible for additional investment incentives under VRW, VRW Sub-Borrowers shall implement or commit to implement veteran-friendly measures with the support of EBRD Consultant(s) and the PFI, as detailed in the guidance note and supplementary materials for VRW Sub-Borrowers.</td></tr>
<tr><td>3</td><td>IDP or Returnee</td><td rowspan="10">No</td></tr>
<tr><td>4</td><td>Persons with Disability</td></tr>
<tr><td>5</td><td>Sub-Borrowers from the War Affected Territories</td></tr>
<tr><td>6</td><td>Women-led MSMEs</td><td rowspan="7"><u>N/A – this category does not apply to Residential Borrowers</u></td></tr>
<tr><td>7</td><td>Youth-led MSMEs</td></tr>
<tr><td>8</td><td>Sub-Borrowers that lost their assets due to forfeiture/mobilization for state needs during martial law</td></tr>
<tr><td>9</td><td>Small Farms</td></tr>
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<tr><td>11</td><td>Micro Enterprises</td></tr>
<tr><td>12</td><td>Companies Supporting Humanitarian De-Mining Activities</td></tr>
</table>