



ENGAGE
for ESG

Bird & Bird

New Business Opportunities: ENGAGE in the Sustainable Finance Reform and the Green ABS Deals

Milano 26 febbraio 2025



Co-funded by the
European Union





The EU Taxonomy: impact on lenders

— Lucia Alessi, European Commission JRC





The EU Taxonomy: impact on lenders

Lucia Alessi

Team Leader - Financial Research

European Commission – Joint Research Centre

lucia.alessi@ec.europa.eu

EU sustainable finance framework

1. EU TAXONOMY



A common classification of economic activities contributing to climate and environmental objectives.

- Taxonomy Regulation: **applies** since July 2020
- Climate Delegated Act and Disclosures Delegated Act **apply** since January 2022
- Complementary Climate Delegated Act **applies** since January 2023
- Environmental Delegated Act adopted by the Commission in June 2023, **applies** since January 2024

2. DISCLOSURES



Comprehensive disclosure regime for both non-financial and financial institutions to provide investors with the information necessary to make sustainable investment choices.

- Benchmark ESG disclosures **apply** since April 2020
- Sustainable Finance Disclosure Regulation (SFDR) **applies** since March 2021
- Sustainability preferences **apply** since August 2022
- Corporate Sustainability Reporting Directive (CSRD): first companies **report** for financial year 2024



3. TOOLS

Broad toolbox for companies, market participants and financial intermediaries to develop sustainable investment solutions, while preventing greenwashing.

- EU Climate Benchmarks Regulation **applies** since April 2020
- Regulation for a EU Green Bond Standard (EUGBS), **applies** since Decem. 2024

ESG ratings provide an assessment about the ESG characteristics, exposures to ESG risks or impacts of an entity, a financial instrument or a financial product.

- Regulation on ESG ratings providers

EU Taxonomy – defining sustainable



A classification system

Provides clarity on what is an environmentally sustainable activity and under which circumstances.



A measuring tool

Measures the degree of sustainability of an investment and the degree of green activities of companies



A transition tool

Helps investors and companies to plan and report on the transition. It sets the objectives and the direction of travel for different economic activities.

What the EU Taxonomy is **not**:



- It's not a mandatory list to invest in
- It does not make any judgement on the financial performance of an investment
- What's not green is not necessarily brown

6 environmental interlinked objectives

CLIMATE CHANGE

Mitigation

Adaptation

***First Technical Screening Criteria
in the Climate DA (2021) and
Complementary DA (2022)***

OTHER OBJECTIVES

Transition to a circular economy

Pollution prevention and control

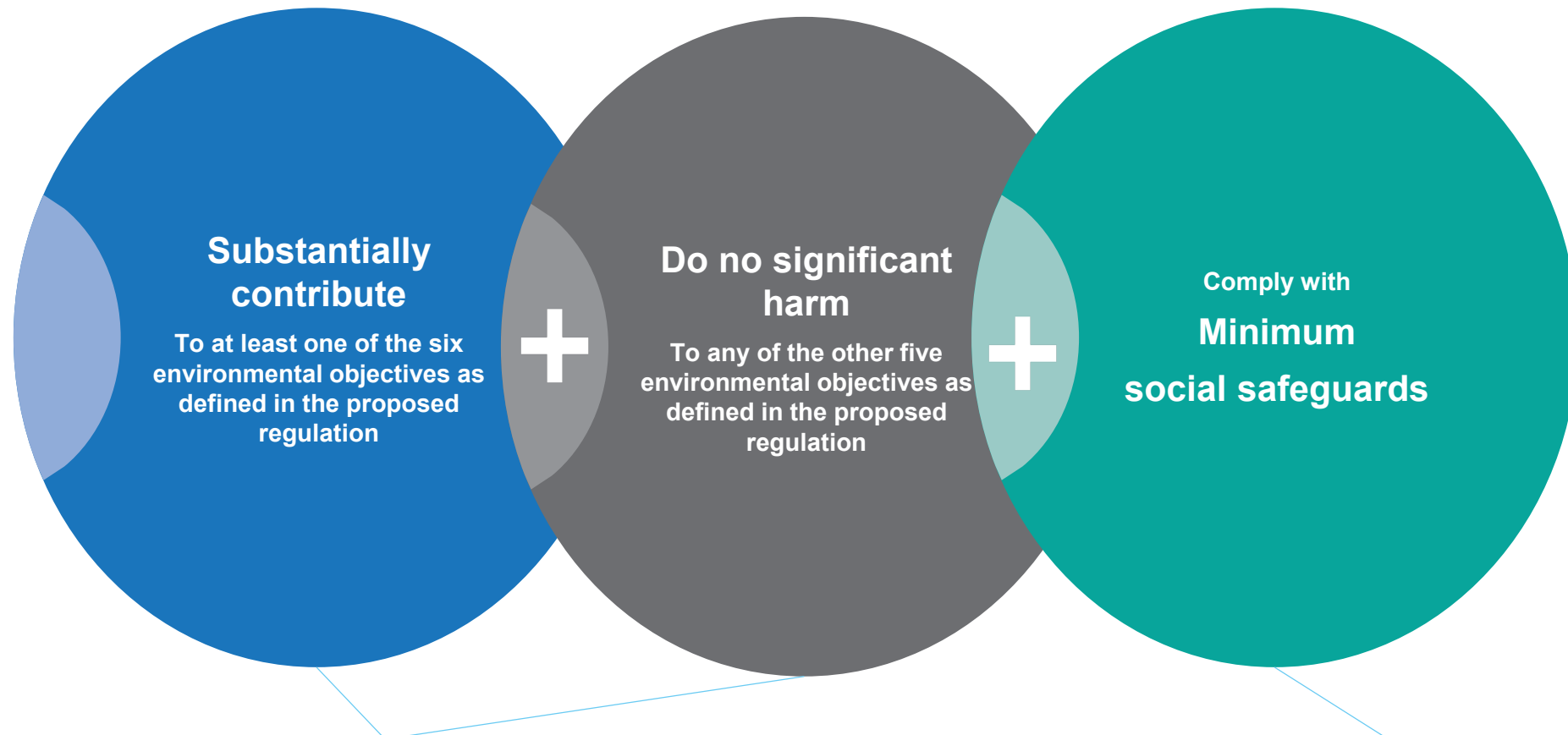
Sustainable use and protection of
water and marine resources

Protection and restoration of
biodiversity & ecosystems

Environmental DA (2023)

Basic conditions

Activities are green if they...

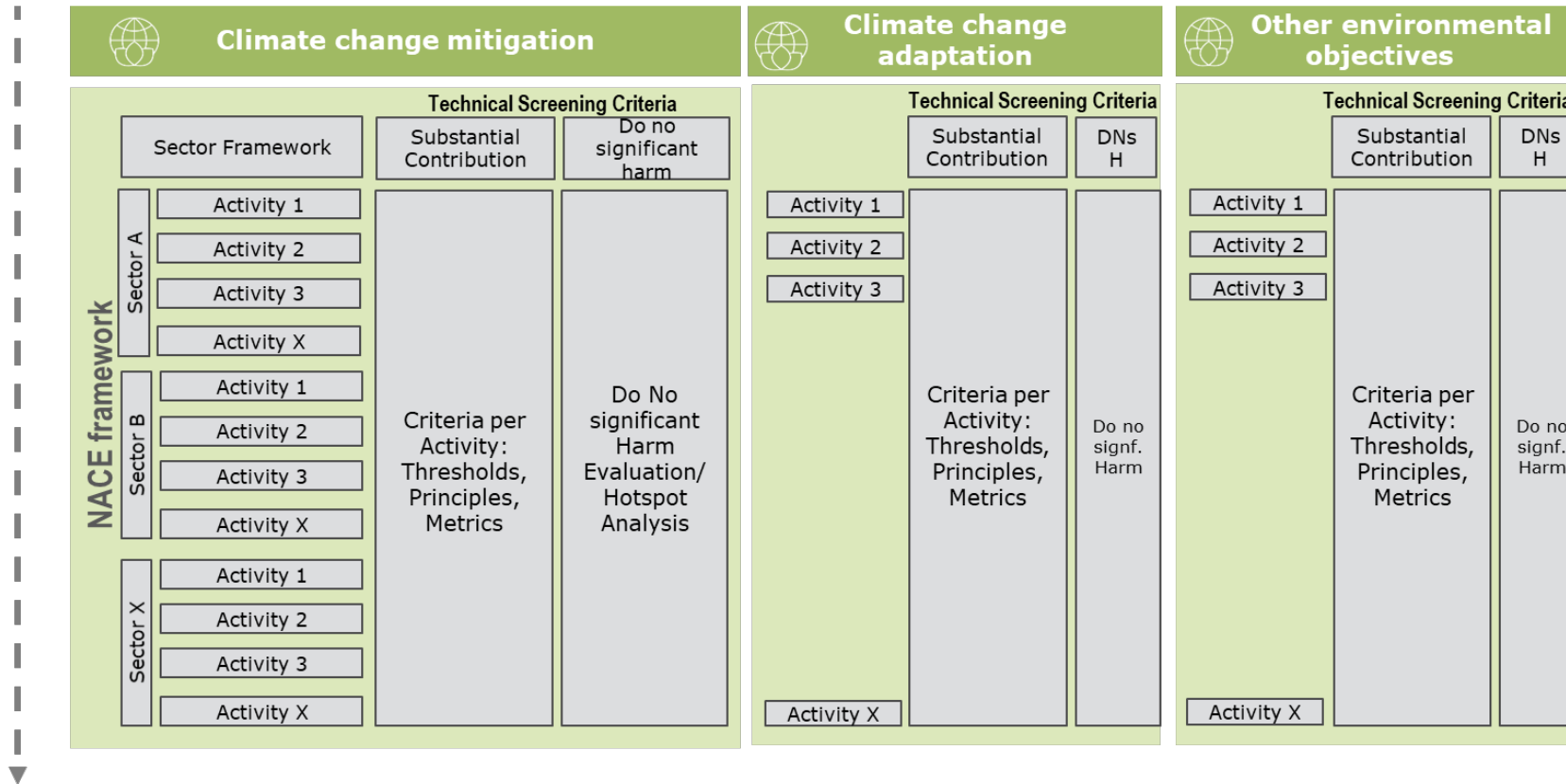


Comply with quantitative or qualitative
Technical Screening Criteria

UN Guiding Principles and OECD Guidelines

The EU taxonomy – what it looks like

Progressive development of activities



Construction of new buildings

	Climate change mitigation
SUBSTANTIAL CONTRIBUTION	10% better than NZEB

*Shortened from Climate DA
(illustrative example only)*

	Climate change adaptation	Water and marine resources	Circular economy	Pollution prevention and control	Biodiversity and ecosystems
DO NO SIGNIFICANT HARM CRITERIA	<ul style="list-style-type: none"> - Performing a robust climate risk and vulnerability assessment 	<ul style="list-style-type: none"> - Thresholds for max water use for water appliances (not for residential RE) 	<ul style="list-style-type: none"> - At least 70% of construction and demolition waste is prepared for reuse/recycling 	<ul style="list-style-type: none"> - No polluting substances as listed in relevant EU laws (e.g. mercury, formaldehyde) 	<ul style="list-style-type: none"> - Performing an environmental IA, implementing required measures - No construction on fertile soil - No destruction of forests - No destruction of habitats of endangered species

Renovation of existing buildings

	Climate change mitigation
SUBSTANTIAL CONTRIBUTION	At least 30% improvement in energy efficiency

*Shortened from Climate DA
(illustrative example only)*

	Climate change adaptation	Water and marine resources	Circular economy	Pollution prevention and control	Biodiversity and ecosystems
DO NO SIGNIFICANT HARM CRITERIA	<ul style="list-style-type: none"> - Performing a robust climate risk and vulnerability assessment 	<ul style="list-style-type: none"> - Thresholds for max water use for water appliances (not for residential RE) 	<ul style="list-style-type: none"> - At least 70% of construction and demolition waste is prepared for reuse/recycling 	<ul style="list-style-type: none"> - No polluting substances as listed in relevant EU laws (e.g. mercury, formaldehyde) 	NA

Acquisition and ownership of buildings

	Climate change mitigation
SUBSTANTIAL CONTRIBUTION	Energy Performance Certificate A or In the top 15% of the national or regional building stock

*Shortened from Climate DA
(illustrative example only)*

	Climate change adaptation	Water and marine resources	Circular economy	Pollution prevention and control	Biodiversity and ecosystems
DO NO SIGNIFICANT HARM CRITERIA	- Performing a robust climate risk and vulnerability assessment	NA	NA	NA	NA

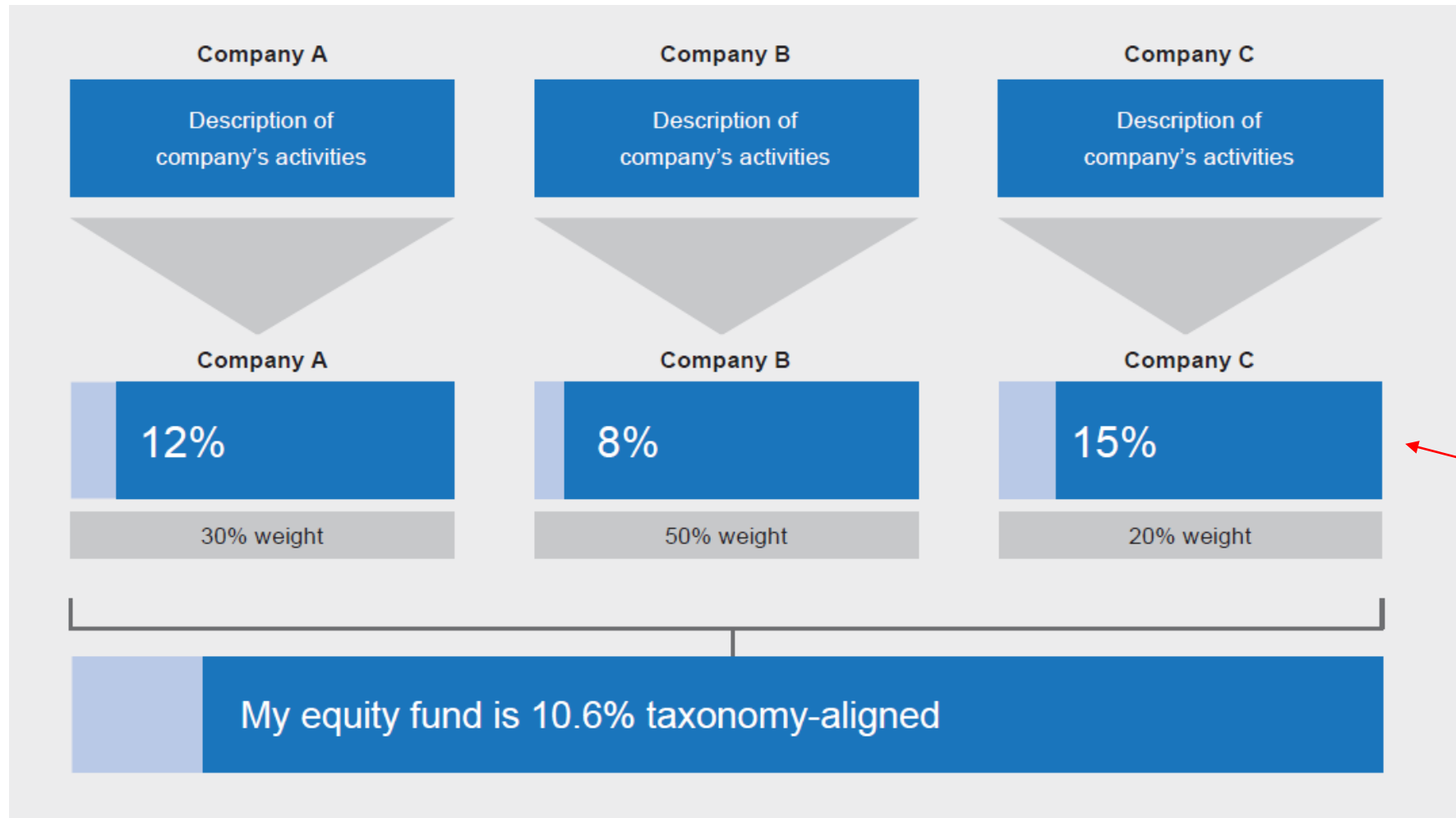
Acquisition and ownership of buildings

	Climate change adaptation
SUBSTANTIAL CONTRIBUTION	Adaptation solutions are implemented Robust climate risk and vulnerability assessment

*Shortened from Climate DA
(illustrative example only)*

	Climate change mitigation	Water and marine resources	Circular economy	Pollution prevention and control	Biodiversity and ecosystems
DO NO SIGNIFICANT HARM CRITERIA	<ul style="list-style-type: none"> - EPC C at least or - In the top 30% of the building stock - NZEB or better for buildings built as of 2021 	NA	NA	NA	NA

The Taxonomy-alignment of a financial portfolio



Based on share of Taxonomy-aligned Turnover or CapEx

Banks' Green Asset Ratio (GAR)

Proportion of the bank's assets invested in Taxonomy-aligned economic activities as a share of total assets (except sovereign exposures)

Breakdown based on the objective, type of counterparty, transitional and enabling activities

Mortgages, renovation loans and car loans included.

Exposures to **SMEs and non-EU** counterparties excluded from the numerator

Green bonds included in the numerator (but not green loans to SMEs) based on their Taxonomy-alignment

Financial institutions can disclose **voluntary KPIs** including (estimates of) exposures to sovereigns, SMEs, non-EU

Schedule of disclosures – Climate

	2022*	2023	2024	2025
Corporates (NFRD)				
Investment firms				
Asset managers			***	
Insurers	KPI Underwriting			
	KPI Assets		***	
Credit institutions	Main GAR			
	Additional KPIs**		***	

*Entry into force: 1 January 2022, reporting based on previous FY e.g. 2021 data for 2022 reporting

**Trading book and Fees and Commissions delayed to 2026

***Reporting for financial holdings may only account eligible data from previous FY, aligned in 2025

Taxonomy-eligible data

Taxonomy-aligned data

Mix according to holdings

Schedule of disclosures – Environment

	2024*	2025	2026	2027
Corporates				
Investment firms				
Asset managers			***	
Insurers	KPI Underwriting			
	KPI Assets		***	
Credit institutions	Main GAR			
	Additional KPIs**		***	

*Entry into force: 1 January 2024, reporting based on previous FY e.g. 2023 data for 2024 reporting

**Trading book and Fees and Commissions KPIs apply as of 2026

***Reporting for financial holdings may only account KPIs data from previous FY, alignment reporting in 2027

Taxonomy-eligible data

Taxonomy-aligned data

Mix according to holdings

Thank you

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The ENGAGE for ESG initiative





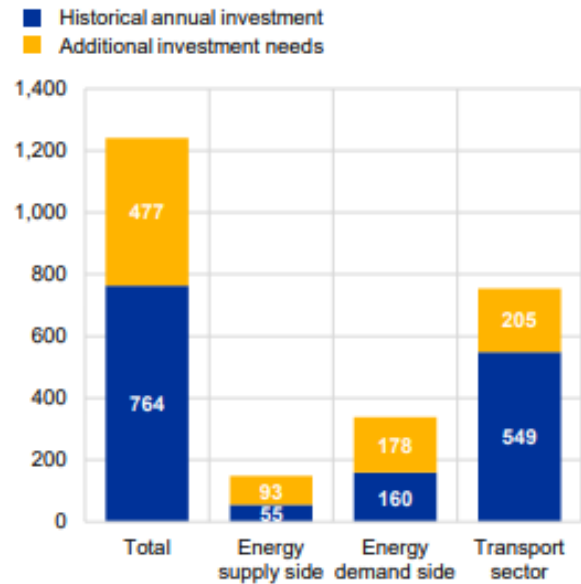
ENGAGE for ESG initiative

Chart 1

Green investment need estimates in the EU

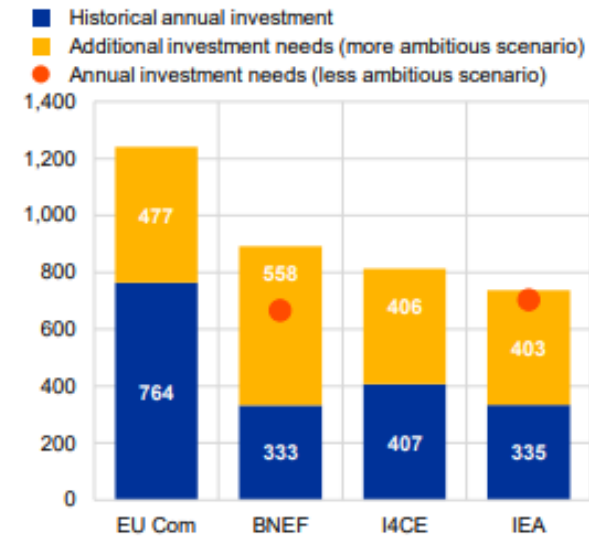
a) Annual green investment needs by category in the EU to 2030

(EUR billions)



b) Comparison of annual green investment need estimates in the EU, to 2030

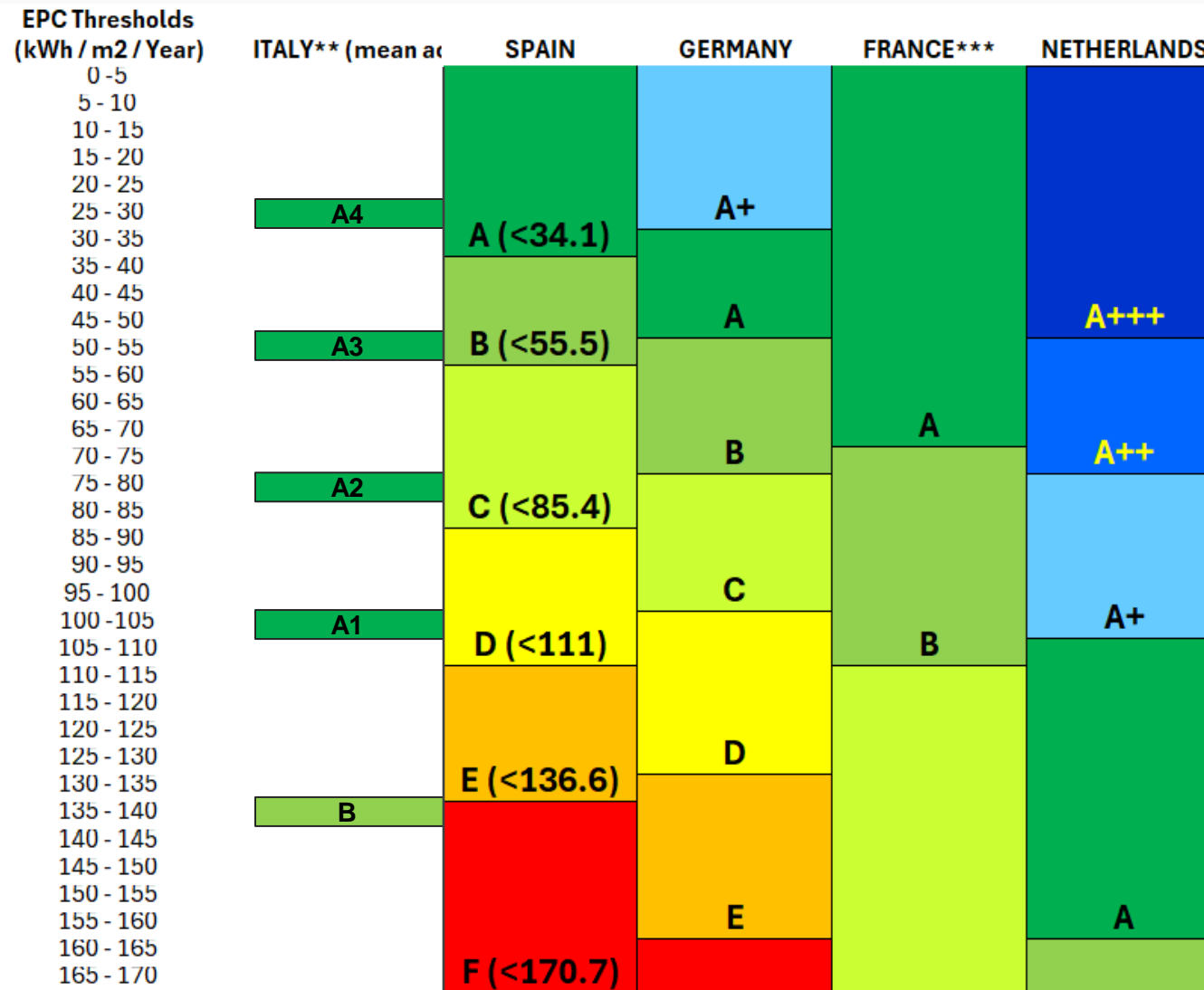
(EUR billions)



Sources: European Commission (2023a), IEA (2024), BNEF (2024), Institute for Climate Economics (2024) and ECB calculations.
Notes: The additional annual investment estimates reflect the needs to 2030, in addition to past investment, to achieve the Green Deal targets for 2030. Total green investment needs are the sum of the historical and additional investments in the EU. Panel a) shows the green investment needs estimates of the European Commission. Historical investments refer to the period 2011-20. Panel b) shows the annual estimates of green investment needs of various institutions to 2030. Historical investment refers to annual averages: European Commission (2011-20), BNEF (2023), I4CE (2022) and IEA (2021-23). The IEA and BNEF estimates are adjusted for fossil fuel investments. For Bloomberg, the historical investment figure pertains to the EU-27 countries, whereas the estimates for additional investment needs include the EU-27 as well as Norway and Switzerland, as no EU average was available. The BNEF and IEA estimates in the more ambitious Net Zero Scenario are compared with the less ambitious scenario: the Economic Transition Scenario for BNEF and the Announced Pledged Scenario for the IEA. See also footnote 6.



EPC Discrepancies Across Europe



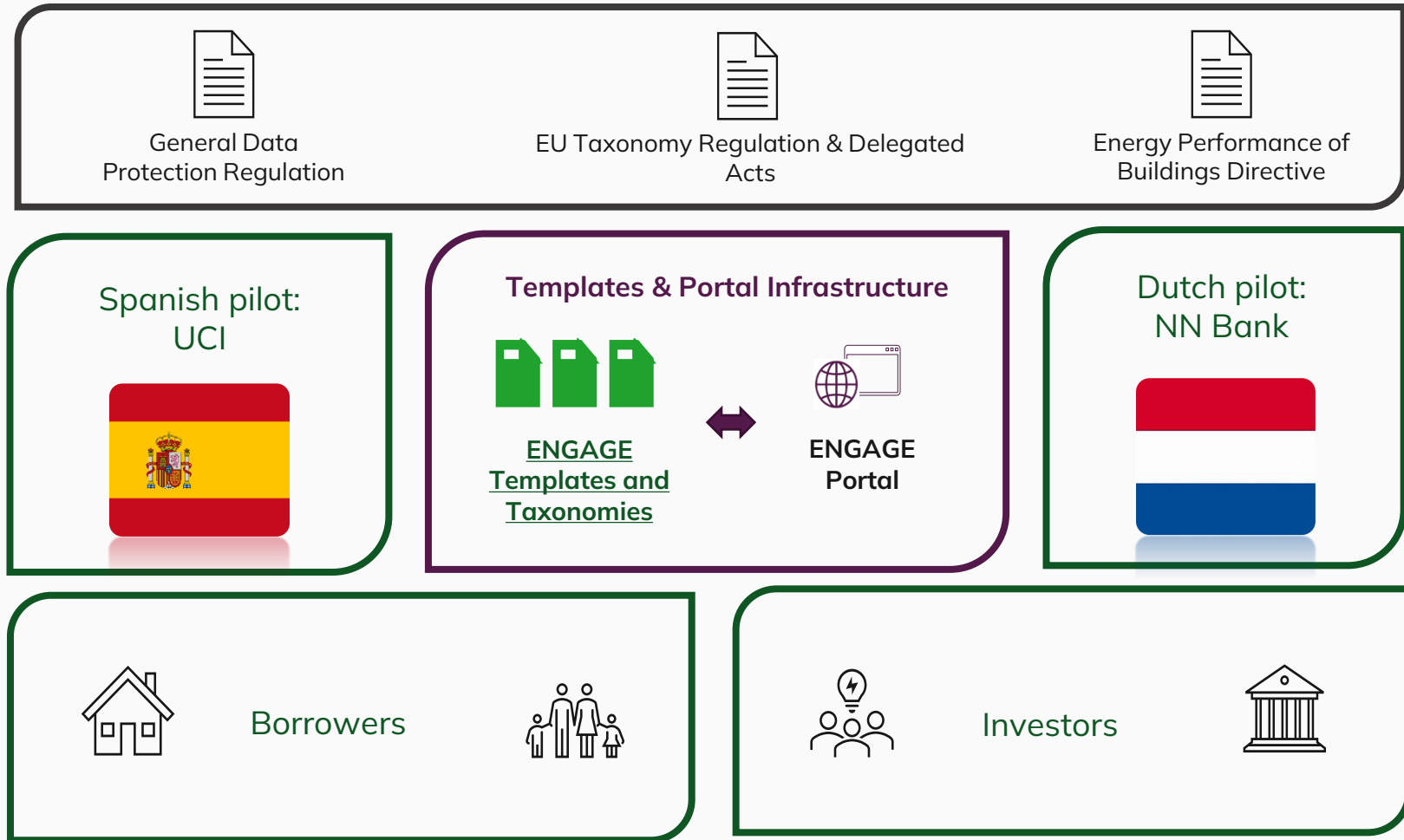
Source: [Revisiting "The Babel Tower Of EPC Ratings": Updated Thresholds Across Europe - European DataWarehouse](#)



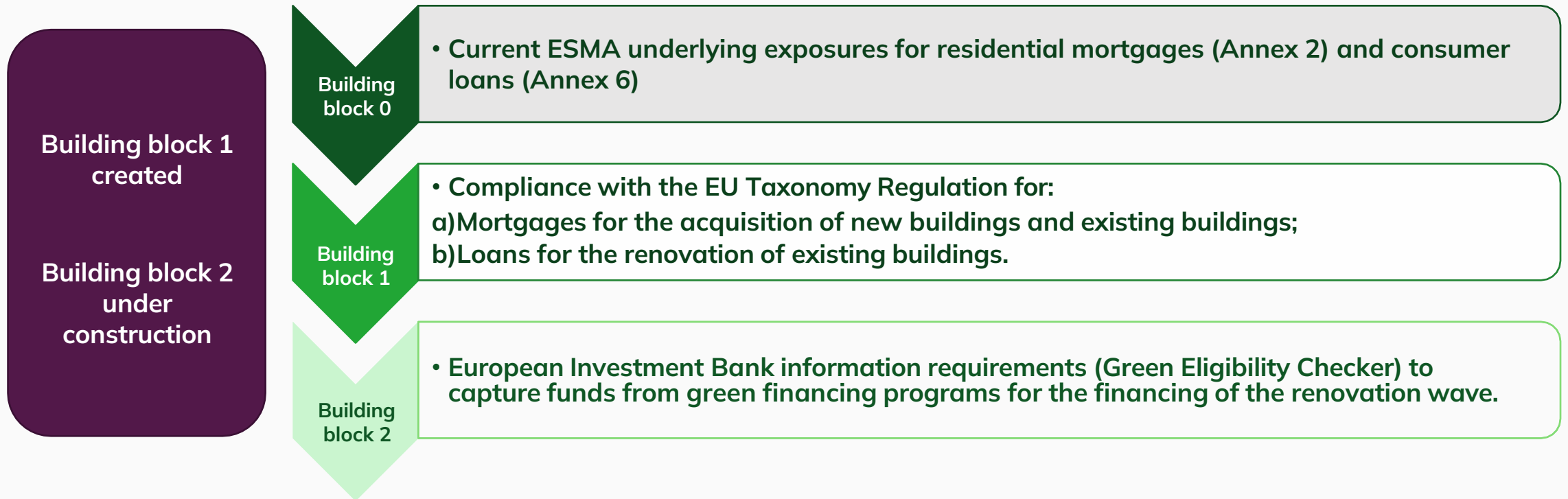
ENGAGE for ESG initiative description

Two main pillars:

1. A **template** for real estate data encompassing key EU sustainable finance disclosure requirements;
2. A **portal** to assess EU Taxonomy alignment.



The ENGAGE Templates: structure



The ENGAGE Templates: structure

Building block 0

BUILDING BLOCK	TEMPLATE CATEGORY	SECTION	FIELD CODE	FIELD NAME	CONTENT TO REPORT	ND Options for the BUILDING BLOCK 0		ND Options for the BUILDING BLOCK 1		FORMAT	Building block 0: Minimum level of fields for mortgages
						ND1-ND4 allowed	ND5 allowed	ND1-ND7 allowed	ND5 allowed		
0	ESMA_ANNEX 2: RRE	Underlying exposures information section									
0	ESMA_ANNEX 2: RRE	Underlying exposures inf	RREL1	Unique Identifier	The unique identifier of the transaction. For securitised pool, please use the unique identifier assigned by the reporting entity in accordance with Article 11(1) of Delegated Regulation (EU) .../... [include number of the disclosure RTS]. For not securitised pool, please use the unique identifier code that you have received from the ENGAGE platform when you have registered your transaction	NO	NO			{ALPHANUM-28}	Y
0	ESMA_ANNEX 2: RRE	Underlying exposures inf	RREL2	Original Underlying Exposure Identifier	Unique underlying exposure identifier. The identifier must be different from any external identification number, to ensure anonymity of the obligor. The reporting entity must not amend this unique identifier.	NO	NO			{ALPHANUM-1000}	Y
0	ESMA_ANNEX 2: RRE	Underlying exposures inf	RREL3	New Underlying Exposure Identifier	If the original identifier in field RREL2 cannot be maintained in this field enter the new identifier here. If there has been no change in the identifier, enter the same identifier as in RREL2. The reporting entity must not amend this unique identifier.	NO	NO			{ALPHANUM-1000}	Y
0	ESMA_ANNEX 2: RRE	Underlying exposures inf	RREL4	Original Obligor Identifier	Original unique obligor identifier. The identifier must be different from any external identification number, in order to ensure anonymity of the obligor. The reporting entity must not amend this unique identifier.	NO	NO			{ALPHANUM-1000}	Y
0	ESMA_ANNEX 2: RRE	Underlying exposures inf	RREL5	New Obligor Identifier	If the original identifier in field RREL4 cannot be maintained in this field enter the new identifier here. If there has been no change in the identifier, enter the same identifier as in RREL4. The reporting entity must not amend this unique identifier.	NO	NO			{ALPHANUM-1000}	Y
0	ESMA_ANNEX 2: RRE	Underlying exposures inf	RREL6	Data Cut-Off Date	The data cut-off date for this data submission.	NO	NO			{DATEFORMAT}	Y
0	ESMA_ANNEX 2: RRE	Underlying exposures inf	RREL7	Pool Addition Date	The date that the underlying exposure was transferred into the portfolio. For all underlying exposures in the pool as at the cut-off date in the first report submitted to the securitisation repository, if this information is not available enter the later of: (i) the closing date of the securitisation, and (ii) the origination date of the underlying exposure.	NO	YES			{DATEFORMAT}	

The ENGAGE Templates: structure

Building block 1

BUILDING BLOCK	TEMPLATE CATEGORY	SECTION	FIELD CODE	FIELD NAME	CONTENT TO REPORT	ND Options for the BUILDING BLOCK 0		ND Options for the BUILDING BLOCK 1		FORMAT	Building block 0: Minimum level of fields for mortgages	
						ND1-ND4 allowed	ND5 allowed	ND1-ND7 allowed	ND5 allowed			
1	ENG Annex 2: RRE Addition	ENGAGE Additional Collateral-level information section										
1	ENG Annex 2: RRE Addition	Economic Activity information	EREC1	Unique Identifier	Report the same unique identifier here as the one entered into field RREL1.			NO	NO	{ALPHANUM-28}		
1	ENG Annex 2: RRE Addition	Economic Activity information	EREC2	Underlying Exposure Identifier Building block 0	Unique identifier for each underlying exposure. This must match field RREL3.			YES	YES	{ALPHANUM-1000}		
1	ENG Annex 2: RRE Addition	Economic Activity information	EREC3	Collateral Identifier Building block 0	Unique identifier for each collateral. This must match field RREC3.			YES	YES	{ALPHANUM-1000}		
1	ENG Annex 2: RRE Addition	Economic Activity information	EREC4	General Activity Designation	Enter the activity designation: <ul style="list-style-type: none"> - Construction of a new building (CNNB) - Acquisition and ownership of building (AAOB) - Renovation of existing building (ROEB) - Acquisition and ownership of buildings + renovation (AOBR) - One or more Renovation Measures (REMO) 			YES	YES	{LIST}		
1	ENG Annex 2: RRE Addition	Building information	EREC5	Construction Year	Construction year of the building or apartment as per the cadastral or other relevant documentation			YES	YES	{YEAR}		
					As described in "Commission Notice on the interpretation and implementation of certain legal provisions of the EU Taxonomy Climate Delegated Act establishing technical screening criteria for economic activities that contribute							

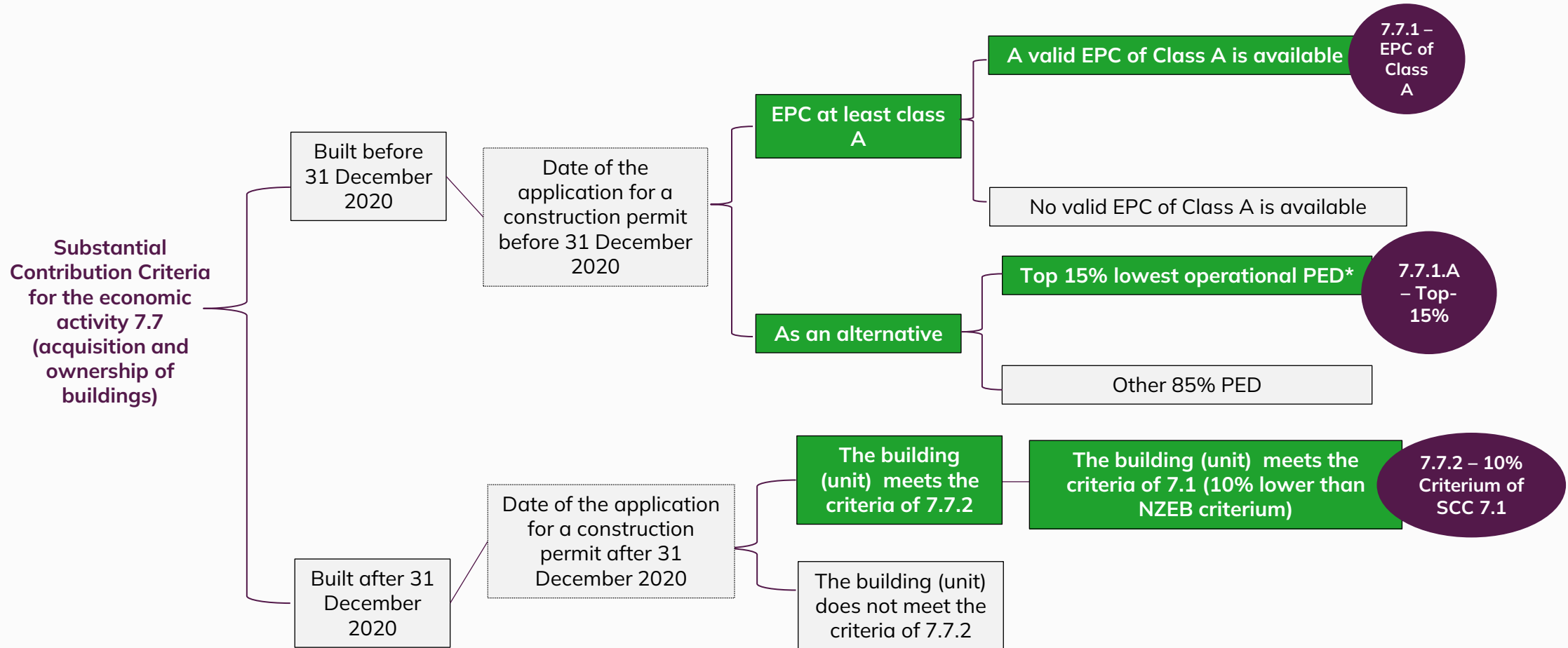
The ENGAGE Templates: structure

Building block 1 – Alignment with EU Climate Delegate Act

Building block 1: Field Optional for the calculation of:									Legenda for Building block 1: Y means optional N means not optional		
Section 3.1	Section 3.5	Section 7.1	Section 7.2	Section 7.3	Section 7.6	Section 7.7.1 - EPC class A	Section 7.7.1 - Top 15%	Section 7.7.2 or 7.1 - PED 10% lower NZEB	Minimum Safeguards		
N	N	N	N	N	N	N	N	N			
N	N	N	N	N	N	N	N	N			
N	N	N	N	N	N	N	N	N			
Y	Y	N	Y	Y	y	N	N	N			



The ENGAGE Templates: decision tree



The EU Taxonomy is the common denominator of many sustainable finance regulations



ENGAGE: EU Taxonomy alignment report



Portfolio Name *Example Portfolio 2024*
 Portfolio Date (DD-MM-YY) *01-08-2024*

Total # of Loans 1300
 Total # of Building Units 1100
 Total Balance €444,600,000.00
 TSC passed % **0.00%**

TSC assessment*

TSC pass Total Portfolio

Section	Economic Activity	Subsection	TSC assessment*						TSC pass Total Portfolio												
			SCC (check passed)			DNSH* (check) passed			TSC Passed (SCC + DNSH)			SCC (check passed)			DNSH (check) passed			TSC Passed (SCC + DNSH)			
			# of loans	# of Building Units	Balance	# of loans	# of Building Units	Balance	# of loans	# of Building Units	Balance	% of all loans	% of total Building u	% of total Balance	% of total loans	% of total Building u	% of total Balance	% of total loans	% of total Building u	% of total Balance	
7.1	Construction of new buildings																				
7.2(1)	Renovation of existing buildings	Major Renovations																			
7.2(2)		Reduction of (net) Primary Energy Demand																			
7.3	Installation, maintenance and repair of energy efficiency equipment																				
7.4	Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)																				
7.5	Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings																				
7.6	Installation, maintenance and repair of renewable energy technologies																				
7.7(1)	Acquisition and ownership of buildings	Buildings built before 31 December 2020: building has at least an Energy Performance Certificate (EPC) class A.																			
7.7(1a)		Buildings built before 31 December 2020 - Alternative: building is within Top 15%																			
7.7(2)		Buildings built after 31 December 2020																			
Total																					

* If there are multiple checks under this criteria we display the aggregate result of the applicable underlying checks.
 ** Failed at least one of the underlying check or no data was present to accurately assess the criteria of the relevant economic activity

First overview of the ENGAGE – EU Taxonomy alignment report. Portraying a breakdown of Technical Screening Criteria assessment as per economic (sub) activity



ENGAGE: EU Taxonomy alignment report



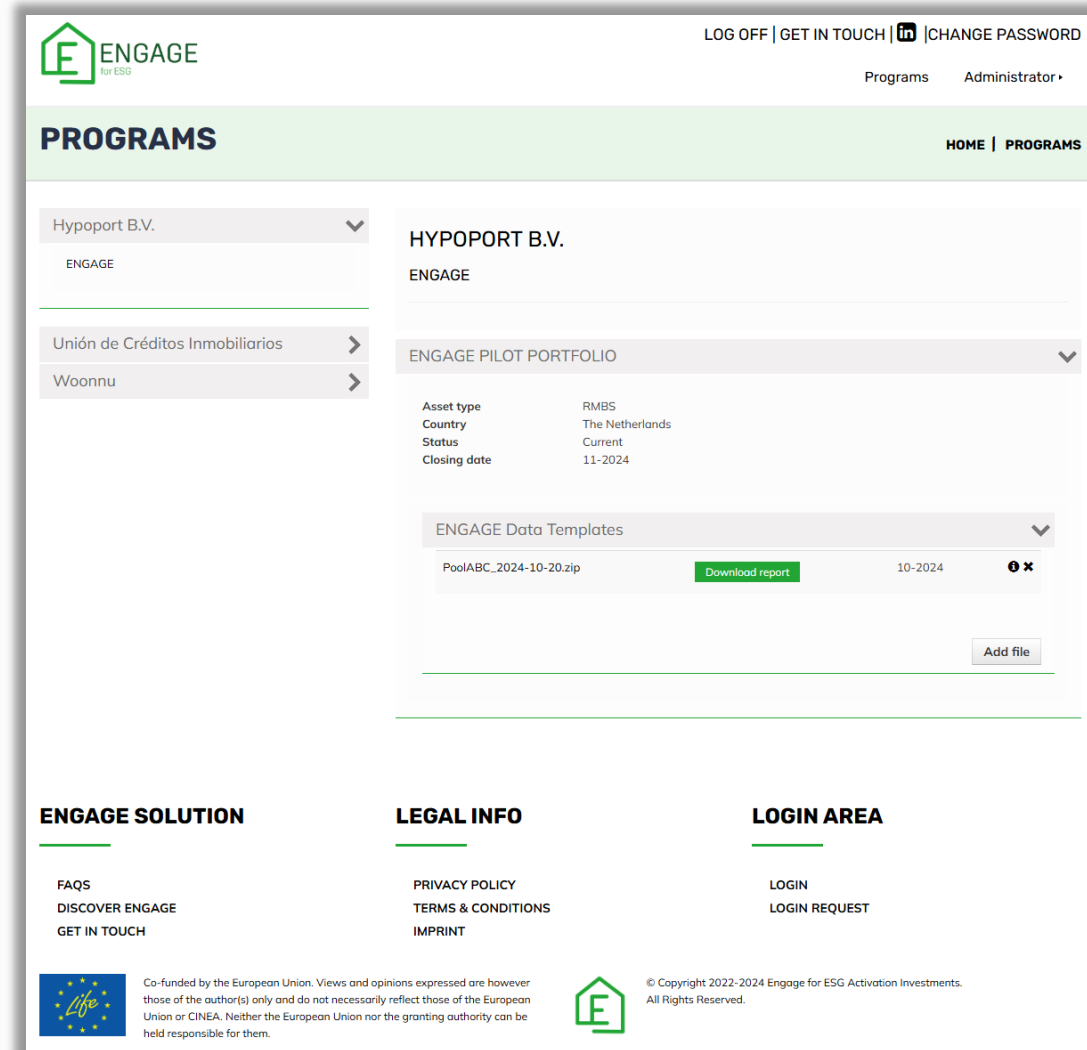
Portfolio Name Example Portfolio 2024
Portfolio Date (DD-MM-YY) 01-08-2024
 Total # of Loans 1300
 Total # of Building Units 1100
 Total Balance €444,600,000.00
 TSC passed % **50.94%**

Section	Economic Activity	Subsection	TSC assessment*						TSC pass Total Portfolio											
			SCC (check passed)			DNSH* (check) passed			TSC Passed (SCC + DNSH)			SCC (check passed)			DNSH (check) passed			TSC Passed (SCC + DNSH)		
			# of loans	# of Building Units	Balance	# of loans	# of Building Units	Balance	# of loans	# of Building Units	Balance	% of all loans	% of total Building	% of total Balance	% of total loans	% of total Building	% of total Balance	% of total loans	% of total Building	% of total Balance
7.7(1)	Acquisition and ownership of buildings	Buildings built before 31 December 2020: building has at least an Energy Performance Certificate (EPC) class A.	460	411	€133,400,000.00	414	370	€120,060,000.00	411	363	€119,190,000.00	35.38%	37.36%	30%	31.85%	33.64%	27%	31.62%	33.00%	27%
7.7(1a)		Buildings built before 31 December 2020 - Alternative: building is within Top 15%	392	301	€113,680,000.00	353	271	€102,370,000.00	349	301	€101,210,000.00	30.15%	27.36%	26%	27.15%	24.64%	23%	26.85%	27.36%	23%
7.7(2)		Buildings built after 31 December 2020	23	22	€6,670,000.00	21	20	€6,090,000.00	21	22	€6,090,000.00	1.77%	2.00%	2%	1.62%	1.82%	1%	1.62%	2.00%	1%
Total			875	734	€253,750,000.00	788	661	€228,520,000.00	781	686	€226,490,000.00	67.31%	66.73%	57.07%	60.62%	60.09%	51.40%	60.08%	62.36%	50.94%

Example of breakdown for economic activity 7.1 (acquisition and ownership of buildings)

The ENGAGE Portal

- The ENGAGE Portal will enable lending institutions to **upload and assess the alignment of their loan portfolios with the EU Taxonomy**.
- The Portal incorporates detailed **loan and collateral level checks**.
- Access to multiple stakeholders (internal reporting, rating agencies, investors, regulatory supervisors, etc.) upon invitation.
- The ENGAGE Portal will enable users to assess multiple portfolios based on the EU Taxonomy.
- The Portal output is twofold:
 1. The **data quality feedback**;
 2. The **EU Taxonomy alignment report**.
- **Trial access** available subject to a standard legal arrangement (available upon request).



The screenshot displays the ENGAGE Portal interface. At the top, the logo 'ENGAGE for ESG' is on the left, and navigation links 'LOG OFF | GET IN TOUCH | CHANGE PASSWORD' are on the right. Below the logo, there are links for 'Programs' and 'Administrator'. The main header is 'PROGRAMS' with a 'HOME | PROGRAMS' breadcrumb. The content area shows a list of programs: 'Hypoport B.V.' (selected), 'Unión de Créditos Inmobiliarios', and 'Woonnu'. The details for 'HYPOPORT B.V.' are shown, including 'ENGAGE PILOT PORTFOLIO' and a table of attributes: Asset type (RMBS), Country (The Netherlands), Status (Current), and Closing date (11-2024). Below this is a section for 'ENGAGE Data Templates' with a table listing 'PoolABC_2024-10-20.zip' and a 'Download report' button. An 'Add file' button is at the bottom right of the main content area. The footer contains three columns: 'ENGAGE SOLUTION' (FAQS, DISCOVER ENGAGE, GET IN TOUCH), 'LEGAL INFO' (PRIVACY POLICY, TERMS & CONDITIONS, IMPRINT), and 'LOGIN AREA' (LOGIN, LOGIN REQUEST). The bottom left features the 'Life' logo and a disclaimer: 'Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or CINEA. Neither the European Union nor the granting authority can be held responsible for them.' The bottom right has the ENGAGE logo and copyright notice: '© Copyright 2022-2024 Engage for ESG Activation Investments. All Rights Reserved.'



V. Become a trial user & upcoming ENGAGE events





Benefits of the ENGAGE for ESG solution

The ENGAGE Templates are an **add-on to the existing disclosure requirements** under the Securitisation Regulation (ESMA Templates).

The ENGAGE Templates expect to be a one-size-fit all solution that **minimises the reporting burden** of lending institutions.

The ENGAGE Templates **can be used for portfolios of loans and different funding structures** (e.g., securitisations, covered bonds).

Proportionality: where information is not available, the ENGAGE Templates provide with the possibility to use “no data” options.

The ENGAGE Portal **does not require any IT implementation** by lending institutions.

The **ENGAGE team supports** test users through the data extraction process, with data enrichment and data quality checks.

The use of the ENGAGE solution is **free of charge until October 2025**.



ENGAGE trial period open until October 2025



- Version 1.1 available now through [Request for Access to the ENGAGE Templates](#)
- More than 60 institutions have requested access to the ENGAGE Templates

- The ENGAGE Team is available for clarifications on the ENGAGE Templates
- Several sessions have already been set up with interested parties

- Signature of a standard legal arrangement for the safe processing of the data
- Free of charge until October 2025
- Possibility to submit the ENGAGE sample files various times enriching the information

- For each sample file submission a compliance report is generated



Upcoming Events

Upcoming In-Person Events:

- [Outvie Securitisation Event](#) – Amsterdam, 25 March
- [Sustainable Finance conference](#) – Athens, 27 March
- ENGAGE In-Person Event - Madrid, 7 May

2025 ENGAGE Webinar Series:

- Session II: Omnibus Special – 13 March at 16:00 CET
- Session III: The ENGAGE Portal Launch – 27 March at 15:00 CET, which will feature Sergio Mayordomo (Banco de España research department) on his work and papers currently being prepared. Sergio is the latest addition to the ENGAGE Expert Group.



Register here: [2025 ENGAGE Webinar Series Session II: Omnibus Special – ENGAGE4ESG](#)



Contact us



Marco Angheben
Head of Business Development
& Regulatory Affairs
European DataWarehouse
marco.angheben@eurodw.eu



Gianluca Ginelli
Structured Finance Data Manager
European DataWarehouse
gianluca.ginelli@eurodw.eu



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Website:

engage4esg.eurodw.eu/

Social Media:

<https://www.linkedin.com/company/engage-for-esg-activation-investments/>



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Project Coordinator:

Marco Angheben
marco.angheben@eurodw.eu

ENGAGE General Contact:

engage@eurodw.eu

Communications:

Carla Scarsella
carla.scarsella@eurodw.eu