

Sustainability Policy

Document	Sustainability Policy
Date	07/08/2026
Revision	v.00
Approval	This Policy has been reviewed and approved by EE Group Leadership Team and is effective as of 07/08/2026

Contents

1	Introduction	2
1.1	Purpose	2
1.2	Scope	2
1.3	Internal Review and Approval	2
1.4	Acronyms	3
2	Sustainability Commitments	3
2.1	Environmental Stewardship	3
2.2	Social Responsibility	4
2.3	Governance and Ethical Conduct	4
2.4	Integration across our value chain	5
3	Sustainability Strategy	5
4	Risk & Opportunity Management Framework	6
4.1	Identification of ESG risks and opportunities	6
4.2	Assessment of impacts, risks and opportunities	6
4.3	Risk mitigation and action planning	6
4.4	Stakeholder engagement	7
4.5	Reporting and Transparency	7
5	Roles and Responsibilities	7
6	Continuous Improvement	8



1 Introduction

At EuroEnergy, sustainability is fundamental to who we are and how we operate. As a renewable energy developer and operator, we contribute to Europe's transition toward a cleaner, more resilient, and climate-neutral energy system. Our mission to expand the deployment of renewable energy across Europe, is inherently linked to our commitment to environmental protection, social responsibility, and ethical business conduct.

Our strategy and business model are aligned with global climate frameworks, prioritizing investments that support UN Sustainable Development Goals (SDGs) 7 Affordable & Clean Energy and 13 Climate Action, both closely tied to the Paris Agreement objectives of reducing GHG emissions and accelerating decarbonization. We also recognize that our activities influence the environment, local communities in which we operate, and the broader energy landscape. For this reason, we integrate sustainability considerations into our strategic planning and day-to-day operations, embedding environmental, social, and governance (ESG) principles across the lifecycle of our projects, from development and construction to long-term asset operation.

1.1 Purpose

This Sustainability Policy (hereinafter the "Policy") defines the principles and objectives that guide EuroEnergy Group's operations, ensuring that our growth supports the global energy transition while protecting the environment, safeguarding local communities, and promoting the responsible use of natural resources. Achieving this purpose requires the active involvement of our employees, partners, suppliers and contractors, who play a vital role in delivering sustainable outcomes throughout every stage of our projects.

1.2 Scope

This Policy applies to all operations of EuroEnergy Group worldwide. It covers the conduct and activities of all Group companies, employees, as well as any third parties, including suppliers, partners, and contractors, who conduct business with or act on behalf of the Group.

All EuroEnergy Group companies, including the parent company and all subsidiaries, must implement and adhere to this Policy to ensure a consistent and responsible sustainability approach across the Group.

1.3 Internal Review and Approval

This policy is reviewed by the Sustainability & Regulatory Affairs (SRA) Department on a periodic, as-needed basis to ensure it remains accurate, compliant, and aligned with the Group's operational and regulatory requirements.



Following each review, updates are submitted to the EuroEnergy Group Leadership Team, which provides final approval. Once approved, revisions are communicated to all employees across all EuroEnergy entities.

1.4 Acronyms

Acronym	Description
BESS	Battery Energy Storage System
EE or Group	EuroEnergy Group
EIA	Environmental Impact Assessment
ESG	Environmental, Social and Governance
EU	European Union
GHG	Greenhouse Gas
H&S	Health & Safety
IFC	International Finance Corporation
RES	Renewable Energy Sources
SDGs	United Nations' Sustainable Development Goals
UN	United Nations

2 Sustainability Commitments

EuroEnergy is committed to supporting the transition to a climate-neutral economy, while creating long-term value for people and society. As responsible corporate citizens, we recognize our obligation to minimize our environmental footprint, generate positive social impact, and uphold the highest ethical standards across all aspects of our operations.

A key element of this commitment is the continuous assessment of our environmental and social footprint. By understanding the impacts of our activities, we can target meaningful improvements in the short, medium, and long term that align with sustainable development principles. This includes prioritizing climate change mitigation through increased clean energy production and the reduction of GHG emissions across our operations.

As we advance on our sustainability journey, open communication and transparent reporting to our stakeholders remain essential. These practices foster accountability, reinforce trust, and demonstrate our commitment to measurable and responsible progress.

2.1 Environmental Stewardship

EuroEnergy is committed to minimizing the environmental footprint and enhancing nature-positive outcomes across our operations. We achieve this by:



- Developing RES projects that contribute to GHG emissions reduction and the transition to a climate neutral economy.
- Reducing our carbon footprint across the value chain.
- Conducting EIAs and implementing appropriate mitigation measures in line with local environmental legislation and international best practice.
- Developing and operating our assets in full compliance with local environmental regulations, permits and recognized best practices.
- Implementing biodiversity restoration and enhancement measures across project sites.
- Supporting circularity principles, including waste reduction, reuse and recycling, responsible materials management, sustainable sourcing of critical and strategic raw materials, resource efficiency, and end-of-life planning.

2.2 Social Responsibility

We commit to conducting business ethically and supporting the local communities in which we operate by:

- Prioritizing occupational H&S as a non-negotiable principle.
- Ensuring safe working conditions for employees, contractors, and partners.
- Engaging transparently with local communities and stakeholders.
- Supporting local communities' economic growth and implementing initiatives that address community needs.
- Respecting human rights and promoting fairness, diversity, and inclusion within our workforce and supply chain.
- Providing accessible and confidential channels for raising concerns, including EuroEnergy's Grievance & Whistleblowing online platform, available to employees, contractors, and external stakeholders.

2.3 Governance and Ethical Conduct

We uphold high business standards and strong governance and accountability by:

- Maintaining transparent, compliant, and ethical business practices.
- Ensuring integrity in procurement, contractor partnerships, and financial management.
- Monitoring asset performance responsibly and safeguarding long-term value creation.
- Embedding sustainability considerations in strategic decision-making and reporting.
- Where applicable, aligning our project development and financing activities with the Equator Principles (EPs), applying their environmental and social risk-management requirements during project screening, assessment, and monitoring.



2.4 Integration across our value chain

Sustainability is embedded in every phase of our business:

- **Portfolio Growth:** Prioritizing technologies, such as BESS, that support Europe's clean-energy transformation.
- **Financing:** Preference for sustainable financing tools and alignment with EU and national frameworks.
- **Development:** Responsible site selection, early environmental screening, and community engagement.
- **Construction:** Strict HSE standards, responsible contracting, and environmental protection during works.
- **Operations & Maintenance:** Continuous performance monitoring, efficient resource use, and lifetime asset optimization.
- **Applying internationally recognized ESG due diligence standards** (e.g., IFC Performance Standards, Equator Principles) in early project screening and development.

3 Sustainability Strategy

EuroEnergy's approach to sustainability is grounded in our corporate mission and vision, and reflects our STARS values: Success, Team Spirit, Accountability, Respect, and Social Responsibility. These principles guide our long-term strategic direction and support our commitment to responsible growth, ethical conduct, and creating lasting value for people, communities and society.

Our strategy prioritizes investments that contribute to the United Nations Sustainable Development Goals (SDGs), specifically SDG 7 Affordable and Clean Energy, and SDG 13 Climate Action. Through the development and operation of renewable energy assets, EuroEnergy supports Europe's transition to a climate-neutral energy system. By growing our renewable asset portfolio organically and through M&A transactions, we work to advance this transition, while ensuring adherence to the highest sustainability standards.

By integrating sustainability principles into our business model and decision-making processes, we aim to deliver clean energy solutions that minimize environmental impacts, create positive social outcomes, and strengthen the resilience and long-term value of our assets.



4 Risk & Opportunity Management Framework

To ensure our strategy remains relevant and effective, we follow a structured and data-driven approach to identifying, assessing, and managing sustainability-related impacts, risks, and opportunities. This approach comprises the following steps.

4.1 Identification of ESG risks and opportunities

EuroEnergy maintains an ESG Risk & Opportunity Register that identifies sustainability-related impacts, risks, and opportunities across our operations. The register serves as the foundation for determining which ESG issues may become material for the Group's strategy and long-term value creation.

To populate the register, the Group identifies potential environmental, social, and governance issues linked to our projects, value chain, and operating environment. The register is updated as our activities, regulatory requirements, and external conditions evolve.

4.2 Assessment of impacts, risks and opportunities

Identified ESG issues are assessed and prioritized based on:

- the severity and likelihood of potential impacts on local communities and the environment, and
- the potential financial effects and implications for the Group's long-term value creation and resilience.

The analysis incorporates insights from relevant departments, external stakeholder perspectives where applicable, and benchmarking against recognized ESG rating methodologies and industry frameworks to ensure alignment with international best practice.

4.3 Risk mitigation and action planning

Based on the outcomes of the materiality assessment, we update our sustainability strategy and develop targeted actions to mitigate risks, enhance positive impacts, and adapt to changing sustainability challenges. These measures include: setting short-, medium-, and long-term sustainability objectives; integrating ESG considerations into decision-making across operations; applying internationally recognized ESG due-diligence standards (e.g. IFC Performance Standards, Equator Principles where applicable); monitoring ESG performance and stakeholder relationships; and strengthening internal collaboration and capacity through training and awareness initiatives.

This continuous management cycle ensures that sustainability considerations are embedded across EE's value chain.



4.4 Stakeholder engagement

EuroEnergy engages with stakeholders to understand their expectations, concerns, and perspectives on ESG matters. This includes employees, contractors, suppliers, local communities, regulators, partners, and investors.

To support transparency and accountability, stakeholders may also raise concerns confidentially through EE's Grievance & Whistleblowing online platform, which covers environmental, social, governance, or ethical issues.

Insights from stakeholder engagement help ensure that our risk identification and assessment processes reflect both internal realities and external expectations.

4.5 Reporting and Transparency

EuroEnergy aims to strengthen the positive impacts of its activities while mitigating potential negative effects on the environment, society and the Group's own operations. For this purpose, we set targets and develop actions to drive improvement and monitor progress.

Our annual Sustainability Report provides a comprehensive overview of our ESG performance, supporting transparency and informed stakeholder dialogue. We also maintain a dedicated Sustainability section on our corporate website to present our relevant strategy, initiatives, and ongoing progress (<https://euroenergy.com/en/sustainability>).

5 Roles and Responsibilities

The Head of Sustainability & Regulatory Affairs (SRA) is responsible for the effective implementation of EuroEnergy's sustainability strategy across the Group's operations. This includes developing and monitoring the ESG risk & opportunity management framework, coordinating sustainability-related activities across departments, and ensuring compliance with applicable regulatory requirements, standards, and disclosures.

In collaboration with other departments, the SRA officer ensures that sustainability considerations and commitments are embedded into EuroEnergy's operations, decision-making processes, and long-term planning. The role is also accountable for periodically reviewing and updating the Sustainability Policy.

Sustainability performance, material risks/opportunities, regulatory developments, and progress against targets, are regularly reported to the COO and CEO, ensuring informed decision-making and strong executive oversight.

ESG Data Governance

- ESG data are collected and maintained by designated data owners under the oversight of the SRA.



- Data owners are responsible for the completeness, accuracy, and timely submission of ESG data in liaison with the SRA.
- The SRA is responsible for coordinating ESG data collection, consolidating and validating ESG information, and maintaining the Group ESG Data Register.
- Supporting documentation and evidence shall be retained to ensure data traceability and auditability.
- ESG KPIs shall be calculated in accordance with documented methodologies and recognized reporting frameworks, where applicable.
- Executive Management reviews and approves material ESG disclosures prior to publication.

6 Continuous Improvement

Recognizing that sustainability is a journey, EuroEnergy is committed to continually improving its sustainability performance through:

- Setting measurable ESG targets and evaluating progress annually.
- Monitoring technological, regulatory, and market developments to adopt best-in-class practices.
- Training employees to ensure high standards of environmental and social responsibility.
- Maintaining transparency with stakeholders through the Grievance & Whistleblowing online platform, our annual ESG reporting, and open communication.

EuroEnergy is dedicated to demonstrating leadership in sustainability, driving positive change, and creating shared value for all stakeholders.

