# Eurowind **Energy**

# Sustainability Policy

At Eurowind Energy, our mission is to be a leading developer, buyer and operator of renewable energy sources. Our sustainability policy describes how we can achieve this mission by conducting our business in a sustainable manner. It covers our position on environmental, social, and governance matters and guides the way we work at Eurowind Energy. The policy applies to all our business operations.

## Commitment

We are committed to making renewable energy accessible to more people around the world. This means that we are determined to make a solid contribution towards sustainable development and combatting the global climate crisis.

Eurowind Energy supports the UN Sustainable Development Goals. In order to contribute to a better and more sustainable future for all, we work to advance to the achievement of the 17 goals. We believe we can make a particularly significant contribution to six of the goals, which serve as a frame for all of our work with sustainability.



SDG 7 Affordable and Clean Energy and SDG 13 Climate Action are aligned with our core business of developing, constructing and operating renewable energy parks. Generating clean and reliable sources of power is the core of all we do. We contribute actively and decisively to a sustainable and low-carbon future.

At Eurowind Energy, we are determined to create and maintain an inclusive workplace and strive to achieve gender equality in line with SDG 5.

We are contributing to SDG 8 by committing to maintain a work environment with fair terms of employment, proper working conditions and zero discrimination.

In line with SDG 12, we are working on creating sustainable production and consumption patterns by reducing, reusing and recycling resources.

At Eurowind Energy, we take a zero-tolerance approach to corruption, bribery and facilitation payments. We do not use or tolerate any form of forced labour, modern slavery, human trafficking, or child labour in accordance with SDG 16.

## **Environmental matters**

### Climate and environmental impact

At Eurowind Energy, we recognise that climate change is the greatest challenge of the 21<sup>st</sup> century, threatening the natural environment and human well-being. Global climate action is urgently needed to keep the temperature rise below 1.5°C. Our contribution to climate action is twofold: First, we are increasing access to renewable energy around the world. Second, we are reducing our own environmental impact, including carbon emissions.

We wish to contribute actively and decisively to a sustainable and low-carbon future. It is our mission to be a leading developer, buyer, and operator of renewable energy sources, consequently accelerating the green transition. Our business is motivated by our mission to create a world powered by renewable energy.

Within our own operations, we are committed to conducting our business in an environmentally responsible manner, in compliance with all applicable environmental, health and safety laws and regulations, and in a manner that promotes and protects the health and safety of our associates, customers, and the communities in which we operate. We aim for growth that is in harmony with the environment. We conduct environmental impact assessments of new projects as we seek to minimise the environmental impact of our business operations. We safeguard the areas in and around our energy parks, including their flora and fauna, local residents and the landscape.

At Eurowind Energy, we are committed to being CO<sub>2</sub> neutral in our scope 1 and 2 emissions by 2030. In order to achieve this goal, we are establishing good carbon accounting practices in line with the GHG-Protocol. Our environmental performance is measured and controlled in our annually published ESG report. Based on our reporting, we are continuously looking for measures to reduce our emissions and we have ongoing discussions with internal stakeholders on how to improve our performance.

We request that our employees consider the environmental impact of their business decisions before making them. Moreover, we are working together with our business partners and suppliers to reduce the emissions in our value chain by establishing self-reporting processes as well as a supplier code of conduct for our largest suppliers and engaging in dialogue about environmentally conscious practices.

#### Resource management

At Eurowind Energy, we are working on creating sustainable production and consumption patterns by reducing, reusing and recycling resources. To achieve this goal, we aim to draw attention to the sustainable use of resources within our organisation. We are not in the business of manufacturing, which means that our resource management mainly applies to our procurement processes and waste management. We evaluate the production patterns as well as the potential for reuse and recycling of the resources we procure. We are working to reduce our waste and increase our reuse and recycling of resources, for example by refurbishing wind turbines. We aim to ensure the safe handling and disposal of hazardous waste to prevent harm to the environment and human health and safety in collaboration with our business partners.

### Biodiversity

At Eurowind Energy, we recognise that halting biodiversity loss globally is essential for climate change mitigation as well as human health and well-being. We aim to protect biodiversity in our projects, and where possible, achieve a net-positive impact on biodiversity. We are committed to developing processes for measuring the effect of our operations on biodiversity and solutions to avoid, minimise, restore, or offset significant adverse impacts of our projects.

## Social and employee matters

### Health and safety

At Eurowind Energy, we are committed to providing and maintaining a healthy and safe working environment. Our policy for health and safety is to prevent harm, ensure the wellbeing of our employees, and reduce risks as low as possible to keep our employees safe. We are committed to equally prioritizing mental and physical employee well-being and promoting a sustainable work-life balance. The health, safety, and security of our employees and the communities in which we operate are a priority for Eurowind Energy.

We comply with the applicable working environment legislation and ensure the use of proper clothing and equipment. Operating sites can only be accessed in accordance with national regulations and guidelines from relevant organisations, such as the Global Wind Organisation.

## Diversity, equality and inclusion

At Eurowind Energy, we believe that everybody should be recognized and respected for who they are. We are determined to provide equal treatment and opportunities to all employees, irrespective of their individual characteristics, such as gender, nationality, or religious beliefs.

We promote equality, tolerance, and mutual respect. It is paramount for us to create and maintain a culture where everyone is valued and feels they belong. We are committed to creating and maintaining an inclusive environment free of bullying, harassment, and discrimination. Any form of harassment such as aggressive behaviour or the use of offensive language will not be tolerated.

For further information on our approach regarding gender equality and inclusion, please refer to our diversity policy.

### Stakeholder engagement

We play an active part in most communities in which we operate. We create an inclusive dialogue surrounding our projects and have a voice in the discussion about the green

transition of the energy system. In doing so, we try to involve local communities and stakeholders as early as possible in the process, welcome their input, and address their concerns. Our projects are developed together with local competencies, enabling us to create the optimal solution for each local community as well as economic, social, and environmental benefits.

## Respect for human rights

Eurowind Energy supports and respects all internationally recognised human rights, including the Universal Declaration of Human Rights, and internationally recognised labour rights as specified in the International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work. Our policy is aligned with the UN Guiding Principles on Business and Human Rights.

We are committed to maintaining a work environment with fair terms of employment, proper working conditions and zero discrimination. We do not use or tolerate any form of forced labour, modern slavery, human trafficking, or child labour. We respect our employees' rights to free association and representation by a trade union. We expect our business partners and suppliers to operate in accordance with internationally recognised human and labour rights.

We respect the human rights of people in the communities in which we operate, including the rights of indigenous peoples as stipulated in the UN Declaration on the Rights of Indigenous Peoples.

At Eurowind Energy, we seek to prevent or mitigate any potential adverse human rights impact linked to our operations. We commit to providing appropriate remediation in cases where we identify that Eurowind Energy has caused adverse impacts on human rights.

# Anti-corruption and anti-bribery

At Eurowind Energy, we are committed to conducting our business with integrity. We do not tolerate the bribery of, or by, any business partner, government agency or public authority and we maintain honest and fair relationships with government agencies and public authorities. Likewise, we take a zero-tolerance approach towards corruption, fraud, facilitation payments, and money laundering.

At Eurowind Energy we are obligated under the Danish Anti-Money Laundering Act to perform risk assessments and customer due diligence measures in order to ensure that money laundering and terror-financing are detected and reported correctly to the Anti-Money laundering main office.

At Eurowind Energy, we are committed to maintaining accurate records and detecting and preventing fraud. We keep honest, accurate, and complete records and disclose accurate, full, fair, timely and clear information to the government, regulatory authorities, and auditors.

We maintain fair and free competition in accordance with the letter and spirit of each country's competition laws. We expect our business partners and suppliers to not engage in any form of corrupt or illegal practices, including bribery, fraud, facilitation payments and money laundering and to comply with applicable laws.

## Compliance

This sustainability policy is aligned with the UN Global Compact Principles, the OECD Guidelines for Multinational Enterprises, and the UN Convention Against Corruption. We are committed to complying with all applicable national and local laws, rules, and regulations.

This sustainability policy has been approved by Eurowind Energy's CEO and Board of Directors. Our Group Head of Sustainability is responsible for this policy.

The policy applies to all our employees throughout the entire Group and our Board of Directors. Information on how we expect our employees to conduct themselves at work, in accordance with this policy, can be found in our Code of Conduct.

We hold ourselves accountable for our compliance with our policy and we will report on our progress towards the objectives laid out in this policy. We report annually on our sustainability performance in our ESG report. In cases of non-compliance or lack of progress towards our goals, we are required to analyse and debate the causes and corrective measures. We have implemented a whistleblower scheme to enable all of our employees to anonymously report illegal activities, should they detect such.

We expect our business partners and suppliers to follow policies or codes similar to our own, with a focus on human and labour rights, environmental protection, and business ethics. We highlight sustainable business practices in our dialogue with our business partners and suppliers. Furthermore, we are establishing self-reporting processes as well as a supplier code of conduct for our largest suppliers in order to hold our supply chain accountable.