

Galileo Sustainability Policy



Table of contents

Table o	of contents	2
1. Bac	kground	3
1.1.	Context	4
1.2.	Purpose	3
1.4.	ScopeReview and approval	4
	teriality and risk assessments	
2.1	Materiality	5
	Risk assessment	
3. Gal	lileo's Sustainability commitment	8
3.1	Fighting climate change and protecting the environment	8
	Our people, our growth	
3.3	Sustainable supply change and human rights	10
	Creating shared value	
3.5	Business ethics	12
4. Rol	es and responsibilities	14
4.1	ESG governance structure	14
5. Tar	gets, reporting, and actions	16
6. Affi	iliations	16
Appen	ndix A: Targets, reporting, and actions	17
Docun	nent controlError! Bookma	rk not defined.

1. Background

1.1. Context

Galileo Green Energy GmbH and its group companies is a leading developer of renewable energy projects across Europe including solar, energy storage, onshore wind and offshore wind.

We work with numerous local development partners across many European markets via joint development arrangements and joint ventures (JV), and in some markets we lead greenfield developments using in-house resources.

We aim to implement sustainability and ESG best-practice across our wholly-owned subsidiaries by training and supporting our employees in their daily work and by making business decisions in-line with our ESG strategy.

For joint development partners and JV ventures, we aim to identify businesses whose sustainability approach is aligned to our own, and in all cases to influence sustainability and ESG factors primarily via participation on JV Boards and as an active JV shareholder or development partner. Our general aim is to have aligned sustainability principles and targets wherever possible.

1.2. Purpose

The purpose of this policy is to communicate our commitment to sustainability as a way to manage corporate and business activities, in order to create shared value for all our stakeholders and to establish long-term cooperation with them, based on common objectives.

This policy drives inspiration from our mission "to strive to make a meaningful contribution to the European renewable energy transition", from our corporate values (entrepreneurship, transparency, agility, collaboration and empowerment) and is informed by the principles of our Code of Ethics.

This policy will be also used as a foundation for employee training.

1.3. Scope

The principle of this policy applies to all Galileo operations, projects, employees, partners, contractors and suppliers.

Currently all of Galileo's renewable energy projects are in the pre-construction phase, at different levels of maturity, so this policy is designed to address overarching corporate ESG risks as well as those that are directly relevant at the project level during the design and development phase (e.g. Community Engagement, Health & Safety and Climate Change risks). All material ESG risks are taken into account during the development and the design phase where possible in order to anticipate and mitigate possible impacts that may only arise later, during construction or operation (e.g. climate risks).

This policy complements Galileo's other sustainability, compliance and ESG-related policies outlined below. The most recent approved policy applies wherever conflicts exist:

- Code of Ethics
- Health & safety Health, Safety, and Environment (HSE) Policy
- Business continuity Business Continuity Plan
- Carried interest and conflicts of interest Carried Interest and Conflict of Interest Policy



- Business ethics and staff conduct Financial Crime Prevention Policy
- Information Security and related IT policies
- Data protection Data Protection Policy
- Diversity and inclusion (D&I) D&I Policy
- Staff privacy Internal Staff Privacy Policy
- Staff Handbook
- Whistleblowing Policy

The terms "ESG" and "sustainability" may be used interchangeably throughout this document.

1.4. Review and approval

This policy is reviewed, along with the materiality assessment renewals, by the SusCo and approved by Galileo's CEO at least every 2 years. The next review will be before the end of FY25/26.



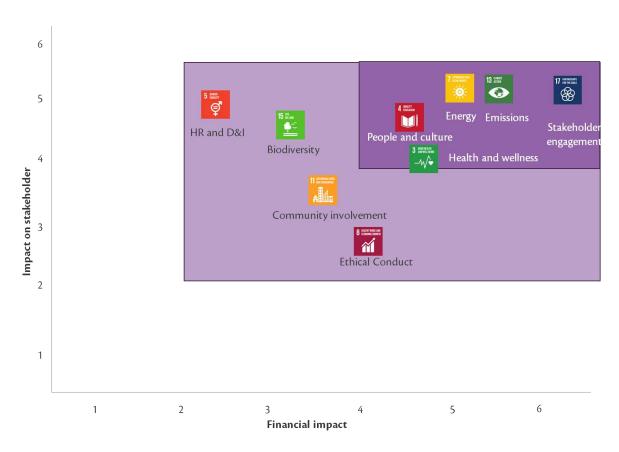
2. Materiality and risk assessments

2.1 Materiality

The materiality of ESG topics to our business are reviewed and updated within this policy, or more frequently as required. Galileo's first materiality analysis was performed in 2024, starting from a competitor benchmark analysis to define the most relevant topics for the sector, and then involving internal and external stakeholders to collect their points of view on Galileo's priorities.

The process, building on GRESB¹ materiality assessment results, considered Galileo Platform employees' inputs through a survey, and involved Galileo Executive Management in a double materiality exercise.

The result of this exercise is represented in the following matrix:



Galileo's aim is to widen the scope of our analysis to further external stakeholders in the FY25/26 financial year, when a review of materiality is foreseen given the growth of the Company and progression towards the construction and operation of our renewable energy projects.

¹ GRESB is a Netherlands-based company that operates an annual sustainability assessment for standing real estate investments, real estate projects in development, infrastructure funds, and infrastructure assets. From these assessments, it provides standardized and validated environmental, social, and governance (ESG) data and benchmarks for the real assets investment community.



2.2 Risk assessment

Galileo systematically identifies, assesses, and mitigates ESG-related factors that could affect the business's long-term sustainability and financial performance. In fact, our risk assessment process already incorporates the most material environmental, social and governance (ESG) risks into the Galileo risk model.

For social issues in particular, risks already considered are related to health and safety and employee engagement. Local community acceptance is another material topic and a social risk already captured (see relevant paragraphs for all these topics for more information on how Galileo manages these risks).

The risks associated with misbehaviour in the Supply Chain (child labour, modern slavery) are addressed through a specific procedure (see relevant paragraph).

Environmental risks and opportunities are directly related to the core business and are mainly energy transition risks (policies, markets, etc.) and climate risks (see relevant paragraph).

The main governance risks are mis-alignment with partners, poor decision making or compliance breaches due to gaps in processes, and reputational risks due to unethical behaviour.

The process for managing risks at Galileo is as follows:

- a) **Risk Identification** Recognizing potential risks that could impact the achievement of objectives.
- b) **Risk Assessment** Evaluating the likelihood and impact of each identified risk to prioritize them.
- c) **Risk Mitigation and response** Developing strategies to manage risks, such as avoiding, transferring (e.g., insurance), mitigating (reducing likelihood or impact), or accepting them.
- d) **Implementation and monitoring** Implementing mitigation actions and continuously tracking risks to adapt strategies, as needed.
- e) **Reporting and communication** Keeping stakeholders updated on risks, the responses implemented, and any necessary actions to be taken.

At the project level, ESG risks are managed during the design and development phase, in particular in relation to the integrity of our business conduct and that of our counterparties, stakeholder and community engagement and preliminary climate change risk assessment (see relevant procedure).

Certain projects are subject to a detailed EIA (Environmental Impact Assessment) during the design and development phase, which assesses potential risks related to environmental topics, from biodiversity to pollution and noise impacts on local communities etc.

As outlined in Appendix A, our near-term and long-term targets include measurement and reporting of material scope 3 emissions including those associated with planning, design, and construction of our projects. This will require project life cycle assessments (LCA) to be completed for typical project(s) during the development phase to assess their whole-of-life greenhouse gas emissions using appropriate and relevant standards and tools (e.g. ISO 14025, One Click LCA). Such LCA analyses of typical project(s) are anticipated to be completed encompassing "cradle to practical completion" life cycle stages to support measurement of our scope 3 emissions.



Anticipating the construction and operation phase, the main focus will be on HSE, supply chain issues, business integrity, adaptation to climate change risks and cybersecurity risks, which should all be properly assessed and monitored in line with existing policies.

One of Galileo's objectives for 2025 will be to carry out a new materiality analysis to reflect the upcoming phase of the company, which will be starting construction activities for one or more project, in order to define in more detail additional ESG impacts and risks to be considered and managed through our risk model. ESG risks applicable to our business are updated within this policy or more frequently as required.

Galileo's ESG risk assessment results and related ESG priorities are defined in the table below:

Material topic	ESG risks	Galileo's Commitments and Sustainability Policy paragraph
Energy and emissions	Energy transition Climate risks	Fighting climate change (paragraph 3.1)
Health and wellbeing/People and culture	Health and Safety and wellbeing	Our people, our growth (paragraph 3.2)
Stakeholder engagement	Community acceptance Employees engagement	Creating shared value for clients and communities (paragraph 3.4) Our people, our growth (paragraph 3.2)
Human rights and D&I	Supply chain/modern slavery Diversity and Inclusion	Sustainable Supply chain and Human rights (paragraph 3.3) Our people, our growth (paragraph 3.2)
Business ethics	Ethical behaviour Compliance	Business ethics (3.5)



3. Galileo's Sustainability commitment

Sustainability is at the heart of Galileo's purpose, embedded in its core business of being a responsible developer of renewable energy projects.

For Galileo this is a starting point to expand the approach to sustainability to all activities and implement it across all relationships.

Galileo aims to contribute to the achievement of the UN 2030 Agenda and its Sustainable Development Goals (SDGs) through our business activities and in the way we implement them.

Our sustainability policy encompasses five axes that represent the most important areas of our impact, as evaluated by our materiality and risk assessments.

3.1 Fighting climate change and protecting the environment

a) Decarbonisation

As a developer of renewable energy infrastructure, we are helping address the global challenge of decarbonisation by accelerating the global low-carbon energy transition. This is at the core of what we do and why we exist.

Climate change mitigation requires everyone to reduce their own greenhouse gas emissions, and we aim to minimise our emissions and offset the residual ones with reputable credits from solid projects.

We support the 2015 Paris Agreement objective to limit global temperature rise and we aim to make a substantial contribution via our core business model of developing renewable energy projects.

b) Climate change risk

We refer to guidance published by the United Nations Framework Convention on Climate Change, which states that global net zero must be achieved by 2050.

We recognise that climate change poses physical and transition risks to physical assets, including renewable energy infrastructure, and we are committed to adapting our business and projects in consideration of these risks.

We consider climate change physical and transition risks in the selection, development and design phases to ensure that our business remains resilient and prepared for the impacts of climate change.

Please refer to our Climate Change Risk Assessment Procedure for more details.

c) Environmental management

We are committed to operating in a manner that minimises adverse impacts upon the environment and maximises the efficient use of natural resources.

We work proactively with our partners to ensure that this approach is considered during all the phases of our projects, with a lifecycle approach, starting from taking into consideration all these



aspects during the selection, development, the design and the construction of our projects and proactively monitoring our impacts during the operation phase:

- Minimise biodiversity loss, especially in relation with threatened or endangered species
- Maximise energy efficiency and minimise consumption of non-renewable energy and compensate CO2 emissions if it is not possible to avoid them
- Minimise quantity of waste generated and maximise waste sent to circular destinations (recycling and recovery)
- Minimise consumption of water resources
- · Minimise air, noise, and light pollution
- Minimise adverse impacts upon landscape aesthetics and heritage areas

3.2 Our people, our growth

a) Health, safety and well-being

We recognise the importance of operating in a manner that protects the health, safety and well-being of people across our business, supply chain, and community.

We are committed to zero harm and provide relevant training to all our employees, based on the level of risk of their activities.

We work proactively with our employees, partners and suppliers to engage them in following best practices in H&S management and we monitor relevant KPIs across our group.

We take measures to evaluate and support wellbeing such as organised team events and employee surveys. We have implemented concrete actions in most of the countries where we are present, that impact the majority of our employees.

Please refer to our separate Health, Safety, and Environment (HSE) Policy for more detailed information.

b) Employee engagement and growth

Galileo considers its employees as the most important resource of the company and is committed to listening to them from time to time, through an anonymous employee survey, in order to gain insights and actionable issues related to their level of wellbeing, job satisfaction and engagement, which includes the following metrics:

- Net promoter score (e.g. "On a scale of 1-10 how likely are you to recommend us to work to friends or family as a place to work?")
- Overall satisfaction score (e.g. "On a scale of 1-10 please rate your overall satisfaction with your role.")

Our target is to maintain a net promoter score of >50 (considered to be very good) in annual employee surveys from 2025.



The Group invests in people development and provides various training opportunities both on technical and personal skills, including ESG, Compliance, HSE, presentation skills and cyber security. We are committed to ensuring that at least 80% of employees complete basic ESG training each year.

c) Diversity and inclusion

We are dedicated to creating a diverse and inclusive environment where everyone feels valued and empowered, free from discrimination or harassment, regardless of their background. To encourage the sharing and consideration of different perspective and viewpoints and to ensure fully informed decision-making, we aim to encourage diversity of gender and backgrounds across our employee group and within our decision-making bodies.

We are committed to maintaining a better than sector average (in Europe) performance for gender balance.

3.3 Sustainable supply change and human rights

a) Human rights

We recognise the importance of protecting human rights across our business, supply chain, and industry. While we have control over some areas of potential human rights risk (e.g. by overseeing employee activities across our offices and projects), we recognise that human rights risks are present across parts of our industry and supply chain over which we have limited visibility, influence, or control.

We assess Human Right and Modern Slavery Risks during the qualification process of our suppliers, and we monitor them during the relationship, to prevent or mitigate any violation or misbehaviour that is directly related to our common activities.

We support widely accepted human rights guidelines including:

- The Universal Declaration of Human Rights (UDHR)
- The International Labour Organization (ILO) Core Conventions
- United Nations Guiding Principles on Business and Human Rights (UNGP)
- OECD Guidelines for Multinational Enterprises
- United Nationals Global Compact (UNGC) human rights guidelines

b) Supply chain governance

We recognise the importance of having a strong understanding about where materials and equipment used in our projects are sourced as well as the businesses and activities involved in our supply chain.

Our sustainable procurement strategy is based on effective risk analysis to identify and manage potential issues. Given the scale and international nature of the renewable energy infrastructure supply chain, it is recognised that Galileo cannot by itself change the supply chain practices of all



suppliers. As a result, we will work together with industry bodies and peers and with our suppliers to properly improve sustainability standards in our supply chains.

The pre-qualification process includes a Human Rights risk assessment and a questionnaire to assess the level of alignment to our ESG priorities for all of our equipment suppliers.

We aim to engage with our supply chain to encourage use of sustainable materials in the construction of our projects. Our approach includes, where appropriate, requiring suppliers to provide environmental product declarations, health product declarations, or other relevant health and environmental disclosures for products used in the construction of our projects, particularly for products or components supplied in large quantities. Examples of the types of specifications preferred for project construction materials include products that:

- Utilise recycled, reused, or renewable materials in product and/or packaging
- Materials with low embodied carbon
- Materials and packaging that can be easily recycled or reused as part of a circular economy
- Materials that transparently disclose potential environmental or health risks associated with their manufacture or use

3.4 Creating shared value

a) Local communities

At Galileo, we recognize the significance of fostering strong, enduring relationships and partnerships with the communities where we operate to create lasting shared value. We are focused on supporting local communities near our projects, working with them collaboratively to address community challenges and create shared solutions.

We acknowledge and respect the cultural values and traditions of local communities and we expect our partners to do the same.

We are focused on supporting local communities in the vicinity of our projects and we aim to communicate with them and gather their feedback periodically, as appropriate to the local context and permitting process, to refine our approach.

We aim to investigate ways in which we can contribute to local communities. The way in which we support each local community differs according to its needs and context. In addition to the different contributions that may be required of us, in accordance with applicable laws, during the development phase, some of the ways in which we intend to support local communities include:

- By employing locals associated with development, construction and maintenance of our projects;
- Through charitable donations or staff volunteering that support local initiatives;
- By enhancing local infrastructure including roads and drainage associated with our project; By protecting, enhancing and/or replacing local habitats and biodiversity (e.g. planting trees).



b) Stakeholder engagement

We aim to operate in a manner that enhances our reputation in our industry and maximises stakeholder satisfaction. We aim to maintain strong relationships with key stakeholders which include (but are not limited to) in no particular order:

- Employees (e.g. staff training and satisfaction surveys)
- Authorities including regulators
- Customers (e.g. surveys, structured feedback sessions)
- Shareholders
- Direct suppliers including contractors
- Community/public
- Broader industry and supply chain

Stakeholder mapping and engagement is the starting point of our Materiality analysis.

Recognizing that stakeholder needs and dynamics can change over time and throughout our project's lifecycle, we continuously review and update our stakeholder list to ensure effective engagement.

We aim to collect feedback and suggestions from our stakeholders, and we have a direct channel with them through the email: sustainability@galileo.energy published on our website.

3.5 Business ethics

a) Ethics

Ethical business practices form the cornerstone and are a prerequisite of our success.

We believe that high ethical standards are beneficial not only for society but also for business, and we are deeply committed to upholding these standards throughout our corporate culture and in all business activities. This commitment is reflected in our Values, Code of Ethics, ethics strategy, policies and business processes.

Galileo's dedication to integrity extends beyond regulatory compliance; it is embedded in every aspect of our operations. We have a zero-tolerance policy for corruption and do not offer, give, accept, request, or receive bribes or other improper advantages. We actively promote fair competition, avoid unethical business partners, protect personal data, and work to prevent all forms of fraud. Through continuous and comprehensive training for management and employees, we ensure that these values are consistently upheld at every level of the organization.

As part of our dedication to maintaining ethical business practices, we place significant emphasis on the integrity of our third-party relationships, and we implement and continuously improve counterparty reputational checks and record-keeping in relation to potential counterparty-risks.



b) Reporting mechanism

We aim to collect and harness stakeholder feedback (e.g. concerns, or grievances) to continually improve our ESG approach. People can report any concerns regarding breaches of this policy via our reporting mechanism (also known as whistleblower mechanism or stakeholder grievance process) summarised below:

- Any employee, contractor, supplier, or member of the public can lodge their report via a web form available on a salient location on our website (https://galileoenergy.integrityline.com/).
- We aim to make our staff aware of the reporting channels and remind them during annual refresher training. We similarly aim to inform our suppliers of our feedback mechanism during their onboarding.

Galileo has zero tolerance for retaliation against anyone who speaks out about conduct they believe is unethical, illegal or not in line with our policies. There will not be any adverse consequences for anyone who raises a concern, as long as they have not knowingly made a false report.

For more information on our reporting system please refer to our separate Whistleblowing Policy and our Code of Ethics.

All of our projects during any stage (e.g. planning, design, construction, operation) have in place procedures to report and escalate significant incidents to the management team and board where appropriate. Examples of the types of incidents that could be reported may include fatalities or significant safety incidents, natural disasters, regulator fines/penalties, significant environmental spills or pollution.

c) Resilience

We recognise the importance of ensuring that our business is resilient and prepared for potential risk events. We aim to proactively identify and manage risks in a manner that maximises the long-term sustainable growth of our business and the reliability of renewable energy supply to our communities.

Based on our risk and opportunity assessment process which incorporates consideration of project-level and business-level ESG risks including climate change risks, our business strategy is considered to be resilient to forecast climate change transition and physical risks, including through all stages of the project lifecycle (planning, design, construction, and operation). In fact, our business strategy is harnessing climate related opportunities. This includes helping address the global challenge of climate change by supporting the global transition to zero-emissions energy and improving societal resilience to natural disasters via the development of decentralised renewable energy projects.



4. Roles and responsibilities

4.1 ESG governance structure

Figure 4.1 outlines our relevant ESG organisational chart for Galileo Group, with descriptions of each ESG-relevant body noted below.

Galileo Green Energy GmbH
Board of Directors

CEO

Director

Director

Director

Director

CEO

Audit, Risk and Compliance Committee

CEO

CFO

Galileo

CEO

CFO

Galileo

CEO

Shareholder

ESG

Sustainability Committee

COO

GC

HR

ESG

Compl
iance

Procur
iance

The compliance Compliance

Strategic role

Management
Involved on specific topics

Figure 4.1: Organisational chart structure diagram.

Within each of Galileo's JVs there will be a tailored ESG structure, with members of Galileo's Executive Management Team representing Galileo's ESG strategy and requirements on JV Boards, defining locally-appropriate policies and measures and reporting back to Galileo on any material differences and developments over time.

Board of Directors

As the most senior governance body with responsibilities for sustainability matters, the Galileo Board is responsible for ensuring that the organisation has in place an appropriate framework to effectively manage ESG-related risks and opportunities.

Board Sustainability Committee

Our Board Sustainability Committee (SusCo) is a Board sub-committee focused on overseeing sustainability strategy development, implementation and ESG reporting. Certain directors, our CEO, COO, GC, Head of Sustainability, Group Compliance Manager and other key members of the management team with ESG responsibilities are represented on the SusCo.



Board Audit, Risk, and Compliance Committee

Our Audit, Risk, and Compliance Committee (ARCC) is a Board subcommittee focused on reviewing policies, processes, reporting, and key initiatives relating to audit, finance, risks, and compliance, including in respect of ESG-related matters, where relevant.

Board Remuneration Committee

Our Remuneration Committee (RemCo) is a Board subcommittee focused on overseeing compensation policies for our staff to ensure that remuneration is aligned with our company policies and objectives, including ESG objectives.

Employees

Our management team is responsible, with operational implementation headed up by Galileo's Head of Sustainability, for implementing our ESG strategy across our operations and projects.

All employees have a portion (10%) of their variable compensation linked to the achievement of annual ESG targets, particularly in the areas of H&S and D&I (see relevant targets in Appendix A below).

Roles with specific ESG-related responsibilities include:

- Chief Executive has ultimate responsibility for ensuring the ESG policy is appropriately implemented.
- Chief Operating Officer most senior employee responsible for corporate-level general ESG matters, climate-related risks and opportunities and health and safety.
- Head of Sustainability responsible for ensuring adequate sustainability policies, processes, reporting and resources are available to reach Galileo's Sustainability Roadmap objectives and ESG targets.
- HSE Manager responsible for ensuring adequate HSE policies, processes, reporting and resources are available to manage HSE aspect of Galileo activities.
- General Counsel responsible for designing, implementing, monitoring, and continuously improving the Group's compliance system while providing guidance to both business and support functions at the group and local levels.
- Group Compliance Manager responsible for the day-to-day implementation of the Group's compliance system, including internal controls, policies and procedures.
- Project Managers responsible for project-level ESG matters including providing the information for the assessment and mitigation of climate-related risks and opportunities.
- Project HSE Officer each construction project has in place a dedicated health and safety officer that manages health and safety matters onsite.
- HR Director responsible for ensuring the application of D&I-compliant procedures in recruitment, compensation reviews and other pertinent HR processes.



5. Targets, reporting, and actions

Our ESG targets, metrics and action plan are reviewed and updated bi-annually with this policy (or more frequently as required) and enclosed by Appendix A.

6. Affiliations

We aim to partner with and contribute to selected industry initiatives and social enterprises aligned with our ESG approach. Table 6.a outlines relevant industry initiatives that we support.

Table 6.a: ESG initiatives that we support.

Initiative	Description
	GRESB is a global benchmark that evaluates the sustainability performance of real assets, providing standardised ESG information to investors and guiding asset operators in enhancing their sustainability practices. We have completed annual GRESB assessments since 2022.
GRESB	
SOLAR STEWARDSHIP INITIATIVE	The Solar Stewardship Initiative (SSI) is a collaborative effort aimed at promoting sustainability and responsible practices within the solar energy industry. It focuses on improving environmental and social impacts across the solar value chain. While we are not currently a member of SSI (procurement phase yet to commence for our projects), we support the SSI Principles and we continue to monitor their guidance and review the level of involvement and resources that we are able to commit to this initiative.



Appendix A: Targets, reporting, and actions

Table A outlines targets, reporting, and actions associated with each of our key ESG priorities. These ESG metrics are currently reported internally to the executive management team and/or Board of Directors. We review our targets, reporting, and actions each time this policy is updated to ensure that they remain relevant and ambitious.

Table A: Targets, reporting, and actions associated with each of our ESG priorities.

Ta	rgets	Reporting	Actions	
Fig	Fighting climate change			
De	Decarbonisation			
•	Maintain carbon neutral operations (scope 1, scope 2, and scope 3 employee business travel) with residual emissions offset annually for Galileo Platform. Net zero scopes 1-3 including projects by 2050. ²	 By FY25/26 report annually greenhouse gas emissions absolute (tCO2e) and intensity (per employee, revenue, MWs operational/in development and AUM bases) across scope 1, scope 2, and scope 3 (business travel). By FY26/27 report annually all material scopes 1-3 greenhouse gas emissions absolute (tCO2e) and intensity (per employee, revenue, and AUM bases). 	 of operational greenhouse gas emissions including offices and employee business travel. Establish annual greenhouse gas emission data reporting by JVs within FY25/26. 	

² We aim to reduce scope 3 supply chain emissions to the extent commercially feasible noting that most scope 3 supply chain emissions are ultimately the emissions of others and beyond our direct control.

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Targets	Reporting	Actions
Climate change risk		
Complete climate change risk assessment annually for offices and projects where risks are material.	Climate change risk assessment results for offices and projects where material.	Implement climate change risk assessment procedure for projects.
Environmental management		
Maintain 100% renewable energy consumption across our offices.	 Operational energy consumption across long-term office leases absolute (kWh) and intensities (per employee, revenue, AUM bases). Percentage renewable energy consumption across offices (%kWh). 	own offices.
Our people, our growth		
Health and safety and well-being		
 Zero harm across operations and projects. Maintain >90% of all employees by number who have completed basic HSE training (all employees with more than 3 months of employment by FY end). 	 Operational safety metrics across offices including fatalities and lost time injuries and intensities (per employee, revenue, and AUM bases). Fatalities and LTIFR across our projects. HSE training hours for Employees. HSE training hours for Contractors (on Construction/Operational sites). Number of HSE audits undertaken for employing entities and In-Construction/Operational Assets within the Group. 	report to identify any gaps.



Targets	Reporting	Actions
Employee engagement and growth		
From 2025 maintain net promoter score of >50 in annual employee surveys.	Employee satisfaction survey response rate and rating (%).	Send annual employee satisfaction survey
Diversity and inclusion		
Maintain gender balance in employee group that is above the renewable energy industry average for Europe.	 Board gender ratio (%). C-suite gender ratio (%). Employee gender ratio (%). 	Prepare first D&I internal annual survey.
Sustainable supply chain and Human righ	nts	
Human rights		
From 2025, annually complete human rights risk assessments for highest risk suppliers.	Human rights risk assessment results for at least those suppliers who operate in a Country or Sector rated as High risk for human rights abuses/modern slavery.	& modern slavery risk assessments for all
Creating shared value		
Local communities		
Define a framework for local stakeholder engagement.	 KPIs related to social impact projects (eg number of students involved in projects with local schools). 	, , , , ,



Targets	Reporting	Actions
Stakeholder engagement		
From 2026, engage with key customers and communities appropriately and methodically	Customer satisfaction survey response rate and rating (%).	Develop customer satisfaction survey appropriate to key customer groups and define frequency and method of delivery with internal relationship owners
ESG capability and ethics		
• From 2025 maintain >80% employees by number who have completed ESG (including compliance, HSE, cyber security, environmental topics) training annually.	 Percentage of employees by number who have completed ESG (including compliance HSE, environmental) training (%).³ 	, , ,
Resilience		
• Same as "Climate change risk" above.	Same as "Climate change risk" above.	Same as "Climate change risk" above.

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³ Applies only to full-time and part-time employees employed for at least three months of each reporting year.

