

# Momentum Energy Group (MEG)

## Environment, Social & Governance (ESG)

### Policy

File Name	MEG Policy-Supplier Code of Conduct_1.0_APPROVED
Version	1.0
Prepared by	Dimitrios Kokkinopoulos, MEPR
Initial Review by	Eva Buchwald Christensen, MG Kim Madsen, CEO, MEG
Initial Approval by	Kim Madsen, CEO, MEG
Reviewed by	Kaj Bakker, Arcus Leo Kwan, Arcus
Approved by	Michael Shalmi, Chairman of the Board, MEG Kim Madsen, Board Member, MEG Annemette Heller, Board Member, MEG

## Version Summary

Version	Scope of Version	Change Description
1.0	Version 1.0 created to conform to ESG requirements	

## Table of Contents

1	Purpose.....	4
2	Vision and values .....	4
2.1	Environment.....	4
2.2	Social.....	5
2.3	Governance.....	7
3	Sustainable development goals .....	8
4	Reporting .....	9
5	Management system.....	10

## 1 Purpose

This policy sets forth the general principles for Momentum Energy Group A/S and its subsidiaries (in the following referred to as "Momentum") regarding the Environmental, Social and Governance (ESG) scheme. This set of standards defines Momentum as a business in the modern world and encourages it to act responsibly in all of the ESG dimensions. In parallel, this policy states the ways and processes that Momentum achieves its ambitions inside the ESG domain by complying and promoting.

All employees are required to and expected to understand and adopt these principles in every aspect of doing business in the name of and on behalf of Momentum. They should not commit immoral actions as pronounced in the final sections of this policy and as thoroughly described in the relevant Code of Conduct.

## 2 Vision and values

Our commitment is to create a better world. Momentum continuously monitors and improves its sustainability factors along with its corporate behavior. It focuses heavily on climate change mitigation, healthy employee management, values communication with suppliers and building concrete corporate policies.

The core business of Momentum is delivering clean energy solutions, thereby increasing sustainability in the world. Momentum in general strives to align its activities and processes with each one of the ESG dimensions by the following practical objectives:

### 2.1 Environment

- Estimate direct or indirect greenhouse gas emissions in all areas of activities and lower its environmental impact.
- Ensure the availability of clean energy supply with a combination of its dedicated service team and external service specialists so conventional power sources are not used.
- Optimize asset performance to make the most out of its green energy production capabilities. The power performance optimization takes place by constant monitoring, component retrofitting, software upgrades and maximum availability. The economical optimization ensures that additional returns are going to be available for further renewable energy investments throughout the whole asset lifecycle.

- Provide innovative solutions to increase energy yield and turbine lifetime with minimum impact on the soil by using the existing foundations or extend the lifetime of old turbines by refurbishing existing spare parts or recirculating old ones. That way, new life is given to the above and the turbine component disposal is prolonged, taking as an example the progressing maturing of the blade recycling market.
- Steer fractions of the revenues of developing turbines to local funds that will restore and enrich the nature and biodiversity conditions of the areas that surround the project. Through the environmental impact assessment, risks to local habitat are revealed and mitigative measures are adopted.
- Avoid as much as possible developing new renewable energy plants in nature protected areas or forests as designated by the Danish Ministry of Environment.
- Respect the seas, marine life and operations in them. Due to its limited activity in offshore sites, Momentum follows ocean sensitive practices and tries to minimize its disturbance of the marine life.
- The nature of the Momentum activities does not cause air/water pollution, contaminate land with hazardous substances while when sourcing materials, the sustainability footprint of the suppliers is examined and discussed.
- Momentum perceives in a very serious matter the light, noise and waste pollution generated by its turbines under operation or planning and mitigates their impact in the local habitat with as many necessary steps as possible.

## 2.2 Social

- Momentum acknowledges how important it is and is committed to the UN Global Compact initiative internally and strives to foster it externally when dealing with suppliers. The principles are listed in the respective Codes of Conduct. Momentum aims to ensure that no child labor, forced or compulsory labor or lack of freedom of association takes place internally or at supplier's facilities.
- The group follows best practices for Health and Safety (HSE) as the safety of its employees and business partners are of ultimate importance to it. Expert training for all topics concerning PPE (Personal Protective Equipment) against fall as well as HSE, Firefighting and First Aid, especially when

considering the nature of the operations of its wind turbines and solar technicians. Momentum strives to minimize lost time and injury frequency rate through H&S training, proper equipment, and reporting. Protocols are stating under which weather conditions technicians are allowed to operate.

- Momentum focuses on attracting the best people and continuously invests in education and development of its employees to ensure cutting-edge expertise and service. That happens regardless of people's religion, race, sexual orientation or gender. Internally, gender gap minimization, diversity and inclusivity are embraced. Participation in the local society through sponsorships and speeches at universities aims to prepare to the next generation for a greener future.
- During bi-monthly online Townhall Meetings, employees are engaged with the latest developments of the group. Complementary is the more frequent organizing of social events of various nature for people to enhance their inter-department interactions and feeling of comfort inside the company. Momentum conducts workplace evaluations as required by law.
- Regular site visits take place where our experienced wind turbine technicians show customers or small groups of colleagues the interior of a wind turbine, how they operate and the view from above. This happens with all the necessary protective equipment during scheduled inspection. Aim is, especially for employees, to get familiarized with the core of their work, enjoy the outdoors and return more knowledgeable to their operations.
- Our newly constructed renewable plants and the ones under development are followed by an innovative approach which includes local participation initiatives and value creation models. Ownership models for landowners ensure that they can directly enjoy the benefits of installing wind turbines or solar panels on the land they grew up and worked on, without being excluded from the developer. Partnering with local companies and local employment are in Momentum's agenda as well and explored where possible to boost the local economy.
- When developing new renewable energy plants, thorough feedback is provided to the impacted stakeholders on the visibility, sound disturbance (during construction and operation), shadowing effects or any other form of discomfort that they might receive. These issues are jointly discussed, and ways of mitigation are found to relief the impact on these external stakeholders.

- The group aims to create the greatest possible growth, value, and satisfaction for its customers without disrupting as much as possible the same principles for its internal or external stakeholders.

## 2.3 Governance

- The company pays its personal, employee and corporate taxes in the countries of activity while refraining from aggressive tax structures and the use of tax havens.
- Momentum has clearly stated its values in regard to anti-corruption, anti-bribery, fraud and anti-money laundering. A whistleblower portal has been established for reporting of this incidence and non-compliance matters. This is deeply rooted in its culture and leadership.
- The company has established ESG factors for its performance and behaviors with financial consequences. In those, positive cooperation with ESG committee and providing all necessary data is of vital importance for the progression of the scheme in the company. ESG actions and performance KPIs are reported in the monthly management report to the board and owners.
- The company handles its documents according to the GDPR policies or the legal framework of the country of operation. Same applies with its cybersecurity measures.
- A protocol has been established for supplier screening and a code of conduct that address suppliers' ways of working.
- Momentum embraces transparency, honesty and inclusion when developing projects where external stakeholders are impacted since it is essential for modern day renewable energy development activities.
- The company has stated publicly in its Code of Conduct the guidelines for avoidance of conflicts of interest, of lobbying and non-compliance while it has also established a whistleblower portal for reporting misbehaviors.
- The board of members includes gender diversity in its three members.



## 3 Sustainable development goals

Momentum is heavily inspired by and pledges that its activities make an impact in relation to the Sustainable Development Goals (SDGs) by the United Nations (UN) Agenda 2030. This list of 17 goals and their sub-targets are a call for action to improve the world by intervening in multiple areas like poverty, social justice, environmental protection, and people's prosperity. Below are listed the SDGs where Momentum feels more relevant and competent to contribute to this global initiative. Some of the contribution is interconnected with the nature of its business but most of it comes from the environmental and social sensitivity that it is characterized by:

### Goal 7: Affordable and Clean Energy

- As the core business, Momentum is managing its own and its customers' renewable energy assets making the most out of their production potential while also developing new green energy projects to increase the share of renewable energy in the global energy mix.
- Momentum uses participative economical models that benefit the local community and add value to the local economy while following fully transparent development practices.

### Goal 8: Decent Work and Economic Growth

- Momentum is committed to ensuring that diversity in gender, age, culture and ethnicity is considered when employing personnel. Being fully socially inclusive, giving opportunities to all people and seeing internships for graduates as an essential part of developing a healthy society.
- Momentum prioritizes health and safety of its employees above all else and is committed to ensuring these values in the environments or processes for all employees, regardless of their job type, location and daily tasks.
- In no way it accepts child or forced labour for itself or for its suppliers.
- It tries to decouple economic growth from environmental degradation by promoting renewable energy.

### Goal 9: Industry, Innovation and Infrastructure

- Momentum is committing to develop quality, reliable, sustainable and resilient green energy infrastructure, to support economic development and human well-being and with a focus on adding value to the local communities through participative economical models.
- Its usage of refurbished turbines and project impact restorative actions, enhance the environmentally friendly and innovative character of the project development team.
- With professional management and dedicated maintenance, the resilience and technical life of renewable energy plants are extended in cases where possible.



## Goal 12: Responsible Consumption and Production

- Momentum is willing to incorporate in its project development, educational campaigns on sustainable energy development and lifestyle on a local level. More specifically on better consumer behavior, lowering household CO2 emissions and reduced climate misinformation in schools or workplaces.
- Momentum is aware of the amount of waste generated at a project site or during operation and is committed to minimizing it by enhancing the tracking system and exploring recycling opportunities. Also, it is promoting the concept of circular economy by using second-hand turbines and refurbishing worn parts that otherwise would increase the waste levels of the industry.

## Goal 13: Climate Action

- Momentum's core activity is to provide clean energy solutions which is line with the climate change mitigation actions. In parallel, it is raising awareness for the importance of developing decentralized renewable energy and securing electricity supply through clean practices, public hearings and community involvement.
- Momentum is committed to making a positive climate action impact and expanding it by adopting the ESG culture's environmental dimension.
- Renewable energy infrastructure is designed to withstand extreme climate conditions and if more extreme conditions are anticipated, Momentum can incorporate a more dedicated procurement strategy for an improved supplier screening process and fulfilling of all the purchase criteria.

## 4 Reporting

It is important for the board, investors, and senior management to be aware of the status in the ESG domain within Momentum. That is why a section in the monthly management report is dedicated to these subjects.

Every quarter, the related Sustainable Finance Disclosure Regulation (SFDR) inputs to environmental emissions, injuries or incidents of various nature are prepared for submission. Through structured matrixes, injuries and work lost days are reported monthly to the board and the owners along with environmental or non-compliance incidents.

To communicate its ESG related actions to the public, Momentum includes a dedicated page on sustainability on its company webpage.