

# ENVIRONMENTAL POLICY

Classification: Public  
Version: 2.0  
Date: 28.8.2024  
Owner: Head of Communications and Sustainability  
Approved: 27 January 2025, Board of Directors

**Making a zero-emission society a reality.**

## 1. Introduction

### 1.1. 1 Background and purpose

Enersense International Plc and its Group companies (collectively "Enersense") are strongly involved in enabling the energy transition of society, the green transition and digitalisation through their wide range of services. We provide services related to energy generation, transmission and storage, from project development and design to construction, maintenance and service, and are a key builder of critical infrastructure in society.

For Enersense, the definition of material sustainability topics is based on a double materiality analysis, which includes both the impact of Enersense on society and the environment and the impact of sustainability topics on Enersense. The material sustainability topics and the objectives and measures targeted at them guide the Group's activities. In terms of the environment, Enersense has identified the reduction of greenhouse gas emissions throughout the value chain as a key sustainability topic and is committed to climate change mitigation in its operations. In addition to climate change mitigation, the Group's key areas of environmental responsibility include energy consumption and efficiency, reducing emissions that affect air pollution, the circular economy and waste management, and biodiversity.

In addition to the key sustainability topics, Enersense is committed to contributing to the following five UN Sustainable Development Goals (SDGs):

- 7 – affordable and clean energy,
- 8 – decent work and economic growth,
- 9 – sustainable industry, innovation and infrastructure,
- 11 – sustainable cities and communities,
- 13 – climate actions.

The purpose of this Environmental Policy is to provide a basis and basic principles for environmental consideration in all Enersense activities and to promote environmentally sustainable and responsible practices as part of Enersense's business operations.

### 1.2. Scope

This Policy applies to all Enersense's employees, subsidiaries and business operations. The Policy must be followed in all countries where Enersense operates. In addition to this Policy, applicable local laws must be complied with, provided that the principles set out in this Policy always constitute the minimum standards to be followed.

### 1.3. Objectives

Within the Enersense Group, we are committed to the following general objectives:

- Reducing greenhouse gas emissions throughout the value chain
- Reducing energy consumption and improving environmental efficiency
- Reducing emissions that cause air pollution
- Reducing waste and improving material recycling
- Integrating biodiversity considerations into our own and customer projects

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## 2. General principles

At the Enersense Group, we follow these general principles:

### **Reduction of greenhouse gas emissions throughout the value chain**

To mitigate climate change, we aim to reduce greenhouse gas emissions throughout Enersense's value chain. Enersense is committed to the Science Based Targets initiative (SBTi), and will set science-based emission reduction targets by the end of 2025. The new targets will be subject to approval by the SBTi and will apply both to Enersense's own operations (Scope 1 and 2) and to the entire value chain (Scope 3). The emission reduction targets set under the SBTi criteria support the Paris Climate Agreement's commitment to limit global warming to no more than 1.5°C.

The majority of Enersense's emissions arise upstream in the value chain, particularly from the procurement of materials and services. At the upstream end of the value chain, we are looking at opportunities to procure more sustainable alternatives for our customer projects, especially for emissions-intensive procurement. In our own operations, the majority of direct greenhouse gas emissions come from fuel consumption by vehicles and machinery. In this respect, we are increasingly moving towards the use of renewable fuels and the electrification of our vehicle fleet. In vehicles, we also put emphasis on energy efficiency measures, such as the selection of correctly sized vehicles, fleet optimisation, logistics planning and economical driving. For our own new purchase electricity and heating contracts, we choose only zero emission or renewable energy.

The growing demand for green energy solutions creates significant business opportunities for Enersense, as the implementation of the energy transition increases investments in clean technologies and sustainable energy systems. At the downstream end of the value chain, our green energy services promote the use of renewable energy and the reduction of greenhouse gas emissions.

### **Integrating environmental impacts into all our activities**

Enersense complies with environmental legislation and other requirements and obligations. Our environmental activities are guided by an ISO 14001:2015 compliant environmental management system, for which we maintain certification through regular audits. We identify environmental aspects related to our activities and reduce our adverse environmental impact in cooperation with our employees, customers and suppliers. To improve our environmental work, we also cooperate and discuss with other stakeholders, such as NGOs and industry associations.

We aim to regularly monitor the environmental impacts of our operations and value chain, and update the Group's key sustainability topics and the goals and measures targeted at them, as necessary. Sustainability themes are considered as part of the Group's risk management alongside other risk categories. Potential environmental incidents or damage are managed by ensuring that employees are aware of the policies and processes, and act in accordance with permits. Through training, we ensure that our people have the necessary skills and competences to manage environmental responsibilities in their daily work.

### **Continuous environmental efficiency improvement**

The environmental impact of Enersense's operations is considered throughout the value chain. Our aim is to reduce the negative environmental impacts of our operations by considering the entire value chain and life cycle of products and services. We improve our environmental and energy efficiency by developing our processes, operating models

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and working methods that take environmental considerations into account. By improving our environmental efficiency, we aim to produce more services and products with less material and waste, fewer emissions and less energy. Energy efficiency is promoted as part of other environmental and sustainable development measures, goals and systems. Energy efficiency measures, such as driving economically and avoiding overloading, aim to reduce energy consumption in both buildings and vehicles. For real estate, energy efficiency measures focus particularly on production facilities.

### **Monitoring and reducing emissions contributing to air pollution**

Enersense uses chemicals, such as paints, which emit aerosols into the air and can contribute to air pollution. The impact of chemical use on the air is minimal and they are used only when necessary.

We follow authorities' guidelines on the use of materials that cause air pollution and use them only when absolutely necessary and no substitutes are available. A small portion of chemicals contain VOCs, the levels of which we monitor and report annually.

### **Promoting circular economy and waste management**

We aim to improve material recycling and reduce the proportion of mixed waste by promoting sorting and reuse of materials. We work in line with the waste hierarchy, i.e. our primary objective is to reduce the amount of waste generated. When waste is generated, we aim to reuse or recycle it. We sort the waste we generate and deliver it to appropriate treatment facilities. If recycling is not possible, we aim to recover the waste as energy.

In procurement, we look at circular economy alternatives, when possible, for example by renting or buying products as a service instead of owning them.

We also improve the recyclability of our high-capacity electric vehicle charging equipment to reduce the negative environmental impact of the end of its life cycle.

### **Taking biodiversity into account**

As an energy sector operator, Enersense has direct and indirect impacts on biodiversity. In our customer projects, we follow the guidelines of the authorities and our customers to take biodiversity into account.

We also consider biodiversity aspects in our own wind and solar power development projects. Renewable energy project development starts by identifying suitable area, excluding valuable and sensitive habitats and areas of special conservation concern, and ensuring adequate distances to identified environmental sites. For a more comprehensive consideration of biodiversity, available biodiversity information, such as biodiversity indices, will be included in the initial screening of project sites. In the future, the project area selection criteria based on the diversity index will be further developed so that the rich biodiversity hidden outside protected areas can also be excluded from project development.

Impacts of wind energy construction are assessed as part of the planning and permitting process. In addition, the environmental impacts of major wind power projects are assessed in the EIA procedure. A separate environmental impact assessment (EIA) procedure is always carried out if there are at least 10 wind turbines or if their combined if their combined capacity is at least 45 MW. In the EIA procedure, the effects of the project on nature, animals and

plants are assessed in more detail, also on the basis of field surveys, and the findings are taken into account in the project design. The views of citizens and other interested parties will also be examined in the impact assessment.

In addition to wind power construction, the EIA procedure also covers Enersense's other business activities, such as customer projects in the field of transmission line construction.

We aim to further develop our biodiversity work and take the biodiversity aspects into account in our operations.

### **Promoting supply chain responsibility**

Responsible procurement of materials and services in the supply chain plays a significant role in Enersense's responsibility work. We are reviewing our supply chain particularly for emissions-intensive procurement, such as steel, and discussing more sustainable options with our key suppliers. In addition to their legal obligations, Enersense requires its suppliers to actively work towards the prevention of environmental damage.

## **3. Roles and responsibilities**

Responsibility for promoting sustainable development and environmental responsibility is shared between the Group and the business areas. Common indicators and targets are defined at the Group level in cooperation with the businesses. The businesses, together with the Group, create action plans in line with the targets, and the progress of these plans is monitored alongside the indicators in the businesses. The Group-level responsibility also includes sustainability reporting and related legal requirements, communication, sustainability training and materiality definition. Management and supervisors are responsible for ensuring that the necessary resources and conditions are in place to manage environmental issues responsibly in the businesses. Every employee is ultimately responsible for carrying out their duties in accordance with our targets and policies. Continuous improvement, also from an environmental perspective, is everyone's responsibility, and each employee should actively take forward the areas for improvement they have identified at work.

The Group Executive Team ensures that the Environmental Policy is appropriate for Enersense, includes a commitment to compliance and continuous improvement of our environmental management system, and provides a framework for setting and evaluating environmental goals. The Group Executive Team has to ensure that the Environmental Policy is understood and that the operating principles are applied throughout the organisation.

The Group's HSEQ team supports the Enersense Executive Team and all employees in ensuring that the Environmental Policy is well understood, communicated and applied.

## **4. Effective date and updates**

This Environmental Policy has been approved by the Group's CEO and will come into force on 27 January 2025. This Policy replaces similar policies previously applied at Enersense. The Group's Head of Communications and Responsibility is responsible for reviewing the Policy on a regular basis and whenever regulatory changes are made to the issues covered by the Policy. The HSEQ team supports and ensures that this Policy is up-to-date and communicated throughout the organisation.