



Momentum Energy Group (MEG)

Environment, Social & Governance (ESG)

Policy



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Purpose

This policy outlines the fundamental principles that guide Momentum Energy Group A/S and its subsidiaries (in the following referred to as "Momentum") in our commitment to operate and grow our business sustainably and responsibly. It reflects our dedication to environmental sustainability, social responsibility, and responsible governance practices (ESG), and forms the foundation for integrating these ESG principles into our overarching strategic goals, as well as our daily operations and decision-making.

All employees are required to read, understand, and incorporate these principles in their conduct of business on behalf of Momentum. It is expected that employees act responsibly as stipulated in this policy and thoroughly described in the Employee Code of Conduct.

Vision and values

At Momentum, we are committed to reduce global CO2 emissions by producing green energy in the most sustainable way, creating value for both people, communities, and nature. We continuously monitor and seek to improve our sustainability performance along with our corporate practices. We focus on initiatives aimed at mitigating climate change, preserving biodiversity, optimizing waste management, and ensuring the working conditions and well-being of our employees. In addition, we communicate openly about our standards and efforts, and engage in collaborations with local communities when possible.

The core business of Momentum is delivering renewable energy solutions. This entails a special obligation to operate and grow our business in a responsible manner. We strive to align our activities and processes with the ESG dimensions by adhering to the principles outlined below.

Environment

Our commitment to environmental sustainability entails working actively to:

- Minimize our direct and indirect carbon emissions (scope 1 and 2), with the goal of achieving net zero greenhouse gas emissions through the reduction of energy consumption across all pertinent areas.
- Consistently maintain and service our turbines to ensure the highest possible production of green energy using our skilled in-house service teams, thereby reducing dependency of conventional power sources.
- Optimize asset performance to maximize green energy production capabilities and uptime through constant monitoring, component retro-



fitting, predictive assessments, and software upgrades. Our commitment includes always striving to reuse all components before procuring new spare parts. In addition to the environmental benefits, these efforts also generate added economic value, providing resources for further investments throughout the lifecycle of the asset.

- Provide innovative solutions to increase energy yield and extend turbine lifetime by using existing foundations and refurbishing or recycling older spare parts and components, effectively postponing component disposal and turbine decommissioning.
- Prevent any local environmental impact during field operations. Due to the nature of Momentum activities, pollution of air, water or soil is assessed as highly unlikely.
- Minimize the impact of wind turbine operations on the local habitat through comprehensive measures, addressing both light and noise pollution, and ensuring responsible waste management practices.
- Restore and enrich the nature and biodiversity conditions of the areas surrounding renewable energy plants by implementing project-specific biodiversity plans and adopting mitigative measures for potential risks to local habitat identified through environmental impact assessments.
- Respect the seas and marine life by following ocean-sensitive practices and striving to minimize disturbance to marine life when operating off-shore.

Social

Our commitment to social responsibility involves taking proactive steps to:

- Uphold human rights and labor rights, striving to eliminate child labor, forced or compulsory labor, discrimination, and any infringement on the freedom of association and right to collective bargaining, not within our organization but also to our suppliers. This commitment is also described in our Code of Conduct for Employees as well as our Code of Conduct for Suppliers.
- Follow best practices for Health and Safety, ensuring the safety of our employees and business partners through comprehensive training, covering topics such as PPE (Personal Protective Equipment), fall protection, firefighting, and first aid etc., along with reporting. This is particularly crucial for the unique operations of wind turbines and solar plants, and protocols specify under which weather conditions technicians are allowed to operate.



- Attract the best talents and invest in ongoing education and development of our employees, ensuring we can continue to deliver cutting-edge expertise and service. This commitment applies to individuals irrespective of their religion, race, sexual orientation, or gender.
- Foster diversity, inclusion, and equality, recognizing the importance and value of a diverse workforce with equal opportunities, by cultivating an environment where every individual, regardless of their background or identity, feels valued, respected, and can thrive.
- Increase employee engagement by informing and involving employees through internal communication and organizing social events that strengthen collaboration and foster a sense of community.
- Boost employee motivation by strengthening their knowledge and understanding of Momentum's operations through site visits, providing small groups of colleagues firsthand experiences of the interior of a wind turbine, how it operates, and the panoramic views from the top.
- Enhancing local municipalities, communities, and landowners' involvement in the development of new projects by prioritizing initiatives such as local partnerships and locally managed funds obtaining economic benefits from renewable plants. Additionally, we explore opportunities for co-operation with local businesses to stimulate the local economy.
- Provide comprehensive feedback to impacted stakeholders during the development of new renewable energy plants through collaborative discussions, that address and mitigate concerns related to visibility, sound disturbance, shadowing effects, or any other form of discomfort during both construction and operation.
- Create the greatest possible growth, value, and satisfaction for our customers by applying the same principles to our external business practices as those guiding our internal operations.

Governance

Our commitment to responsible business practices includes:

- Adhering to all applicable laws and regulations of the countries in which we operate.
- No tolerance to any form of corruption, bribery, fraud, and money laundering. Employees are also required to actively avoid conflicts of interest, ensuring that every business decision aligns with the best interests of the company. This commitment is deeply ingrained in our culture, and we



have established a secure and independent channel for whistleblowers to report any non-compliance or unethical behavior. *Find the link to the whistleblower portal on www.momentum-gruppen.com*

- Restricting political contributions and lobbying activities from employees acting on behalf of Momentum, ensuring transparency, integrity, and alignment with ethical standards.
- Ensuring the payment of personal, employee and corporate taxes in the countries of activity, while refraining from aggressive tax structures and the use of tax havens.
- Handling documents according to the GDPR policies and the legal framework of the country of operation. Same applies with our cybersecurity measures.
- Developing procedures for supplier screening and implementing the Code of Conduct for Suppliers, aiming to foster responsible business conduct and promote sustainable development within our supply chain.
- Ensuring engagement with external stakeholders is founded on transparency, honesty, and active involvement, fostering collaboration, and generating mutual benefits for all parties involved.
- Encouraging employees to actively contribute to ESG initiatives by establishing ESG factors for performance and behavior and selecting key personnel to participate in the ESG committee, fostering a culture of sustainability and responsible business practices throughout the organization.

Sustainable development goals

Momentum is inspired by the Sustainable Development Goals (SDGs) by the United Nations (UN) Agenda 2030. The 17 goals and their sub-targets are a call for action, urging collective efforts to tackle a wide range of global challenges to create a more sustainable and just future.

Below are listed the SDGs where we at Momentum believe we can make a meaningful and competent contribution to this global initiative. While some of these contributions are interlinked to the nature of our business, the majority stems from our commitment to environmental and social responsibility.

Goal 7: Affordable and Clean Energy

- As the core business, Momentum is managing its own and its customers' renewable energy assets maximizing the 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 working environments or processes for all employees, regardless of their job type, location and daily tasks.
- In no way do we accept child or forced labor in our own operation or at our suppliers.
- We strive 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.
- Our usage of refurbished turbines and project impact restorative actions, enhance the environmentally conscious 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 climate change mitigation ambitions. 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.

Reporting

To ensure the effective implementation of the principles outlined in this ESG policy and to make continuous progress in our ESG efforts, we consistently monitor and report ESG data to management and shareholders. ESG-related data is reported monthly in the management report, and we annually report on the applicable adverse sustainability indicators in adherence to the Sustainable Finance Disclosure Regulation (SFDR).

We share information about our ESG-related initiatives with the public through our dedicated sustainability webpage on the company website, www.momentum-gruppen.com.

Management system

The entity conducting wind turbine services operates under the ISO 9001:2015 quality management system which validates the knowledge and ensures quality in working with various turbine models, supporting our commitment to responsible and sustainable business practices.

Version 2.1. Approved by CEO and the Board of Directors in April/May 2024.