



ESG Policy

MEG Policy



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1. Background

At Momentum, we are committed to reducing global CO2 emissions by developing and producing green energy in the most sustainable way, thereby creating value for both people, communities, and nature.

Our ambition is to lead the green transition within the energy sector, ensuring that it is both just and inclusive. We are dedicated to maximizing our positive contribution to society while minimizing our negative impacts on the environment and people.

This policy is aligned with key international frameworks, including the OECD Guidelines, the Ten Principles of the UN Global Compact, and the UN Guiding Principles on Business and Human Rights (UNGPs), and underscores our commitment to integrating environmental, social, and governance (ESG) principles into all aspects of our business. It establishes a consistent and structured approach to ESG that aligns with our strategic objectives and operational practices, ensuring that sustainability is a central driver of growth and value creation.

2. Applicability

This policy outlines the fundamental principles that guide Momentum Energy Group A/S and our subsidiaries (hereinafter referred to as "Momentum") in our commitment to operate and grow our business sustainably and responsibly.

It serves as the foundation for integrating ESG principles into Momentum's strategic direction, business operations, and decision-making processes, ensuring a consistent and aligned approach to ESG across all areas of our activities.

The policy is reviewed annually and updated regularly to reflect ongoing improvements, as well as the evolving regulatory environment and business landscape.

3. Responsibility

The responsibility for overseeing the implementation and compliance with this policy lies with Momentum's Executive Board. The Executive Board is accountable for the strategic direction and overall adherence to the policy, ensuring alignment with corporate objectives.

Management is responsible for ensuring that their team understands the policy and that the activities within their business area align with the outlined principles.

All employees are responsible for supporting the principles, raising concerns if actions misalign with them, and suggesting improvements when relevant.

4. Requirements

4.1 Sustainability commitments

As asset manager, developer and investor within wind and solar energy, we recognize our role in providing solutions to global challenges and contributing to a more sustainable and just future.



We are committed to contributing to a just and inclusive green transition in the energy sector. To demonstrate this commitment, we have joined the UN Global Compact and pledge our support to the Ten Principles on human rights, labor, environment, and anti-corruption.

We strive to incorporate these principles into our strategy, policies, and procedures and align our business activities and ESG efforts with the UN Sustainable Development Goals (SDGs). Our aim is to support the global goals while minimizing our negative impact and maximizing our positive contribution to people and the planet.

We focus on making a positive contribution to the following SDGs:

- **SDG 7: Affordable and Clean Energy** – Developing and producing renewable energy to ensure better access to affordable and stable green energy.
- **SDG 8: Decent Work and Economic Growth** – Ensuring a safe and inclusive work environment, while respecting human rights and maintaining high standards for working conditions across our organization and value chain.
- **SDG 9: Industry, Innovation, and Infrastructure** – Investing in innovative and efficient renewable energy solutions.
- **SDG 12: Responsible Consumption and Production** – Promoting waste reduction and circularity in our operations to extend the lifecycle of resources.
- **SDG 13: Climate Action** – Increasing the share of renewable energy to reduce carbon emissions and contribute to combating climate change.

4.2 ESG principles

The core business of Momentum is delivering renewable energy solutions, which places us under a special obligation to operate and grow our business responsibly. To ensure we effectively uphold our sustainability commitments, we align our strategic direction, business operations, and decision-making processes with the ESG principles outlined below.

4.2.1 Environment

Our commitment to environmental sustainability entails working actively to:

- Reduce our carbon footprint with the goal of achieving net-zero greenhouse gas (GHG) emissions for Scope 1 and 2 through reduction initiatives across relevant areas, while compensating for any remaining GHG emissions with carbon removal credits.
- Consistently maintain and service our turbines with our skilled in-house service teams to maximize green energy production, thereby reducing dependency of fossil energy sources.
- Optimize asset performance through constant monitoring, component retrofitting, predictive assessments, and software upgrades to improve energy production capabilities and uptime.



- Reuse used components before procuring new spare parts, generating both environmental benefits and economic value to support further investments throughout the lifecycle of the asset.
- Provide innovative solutions to increase energy yield and extend turbine lifetime by using existing foundations and refurbished spare parts and components, effectively reducing waste and postponing turbine decommissioning.
- Prevent any adverse 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 adverse impact of wind turbine operations on the local communities through comprehensive measures, addressing both light and noise pollution, and ensuring responsible waste management practices.
- Protect and enhance 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 habitats 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 offshore.

4.2.2 Social

Our commitment to social responsibility involves taking proactive steps to:

- Respect and uphold internationally recognized human rights standards, working to eliminate child labor, forced labor, discrimination, and violations of the freedom of association and the right to collective bargaining, both within our organization and throughout our value chain. We set clear expectations for ourselves, our business partners, and other relevant parties to ensure that human rights considerations are embedded in our operations, addressing potential risks and impacts.
- Follow Health and Safety best practices, ensuring the safety of employees and contractors through e.g. comprehensive training on key topics such as PPE (Personal Protective Equipment), fall protection, firefighting, first aid, and reporting procedures. These practices are particularly relevant for technicians working on wind turbines and solar plants, with protocols specifying permissible weather conditions for operation.
- Foster diversity, inclusion, and equality by cultivating an environment where every individual, regardless of background, identity, or gender, feels valued, respected, and empowered to thrive, ensuring equal opportunities for all employees.
- Attract the best talents and invest in ongoing upskilling of our employees, ensuring we can continue to deliver best in class expertise and service.
- Increase employee engagement and motivation by informing and involving employees through internal communication, organizing social events, and offering site visits to our wind turbines and solar parks to deepen their understanding of Momentum's operations, while strengthening collaboration and fostering a sense of community.



- Ensuring the active involvement of landowners, local communities, municipalities, and other relevant stakeholders in the development of new projects and prioritizing initiatives such as local ownerships and partnerships, and the sharing of economic benefits from renewable energy plants. Additionally, we explore opportunities for local employment and collaboration with local businesses to stimulate the local economy.
- Provide thorough feedback to affected stakeholders during the development of new renewable energy plants through collaborative discussions that address and mitigate stakeholder concerns related to both potential and actual social and environmental impacts during 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.

4.2.3 Governance

Our commitment to responsible business practices includes:

- Adhering to all applicable laws and regulations of the countries in which we operate.
- Enforcing a zero-tolerance policy for corruption, bribery, fraud, and money laundering. Employees are also required to actively avoid conflicts of interest, ensuring that every business decision aligns with the company's best interests.
- Providing a secure and independent channel for whistleblowers to report any non-compliance or unethical behavior. Find the link to the whistleblower portal on our website www.momentumgreenenergy.com
- Restricting political contributions and lobbying activities carried out by employees 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.
- Implementing and maintaining appropriate measures to protect systems, data, and operations, ensuring compliance with data protection, privacy laws, and relevant legal frameworks, including GDPR, NIS2, and other applicable regulations. This includes safeguarding personal data and confidential information through suitable technical and organizational measures.
- Developing and implementing a responsible sourcing program that mitigates the risks of adverse impacts on workers, local communities, and the environment, promotes sustainable development, and fosters responsible business practices throughout our supply chain.
- Ensuring that communication and engagement with stakeholders are grounded in transparency, accountability, active collaboration, and a focus on progress, fostering shared value for all parties involved.



4.3 Reporting

To ensure the effective implementation of the principles outlined in this ESG policy and to drive continuous progress in our ESG efforts, we continually monitor and report ESG data to management and stakeholders.

ESG-related data is reported quarterly to the Board of Directors and annually in Momentum's Annual Report, as well as to shareholders in compliance with the Sustainable Finance Disclosure Regulation (SFDR). In addition, ESG performance is reported annually to the Global ESG Benchmark for Real Assets (GRESB) to assess and improve our ESG practices.

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

