

# Environmental, Social and Governance (ESG) Policy



# **ESG Policy**

This document outlines BeGreen's Environmental, Social and Governance (ESG) policy commitments and how sustainability and ESG factors are integrated into our business.

### **BeGreen's Vision and Mission**

BeGreen's purpose is, together, to power a greener future. Our **vision** is to be a significant player in the green transition, assuming responsibility for it. We believe that the production of electricity in a sustainable manner demands a responsible and holistic approach, integrating economic, environmental, social and governance considerations into all that we do.

Our **mission** is to produce and deliver affordable renewable energy, while caring for our planet, its people and their prosperity, and making a positive societal contribution. We are committed to operating in a way which can achieve our aspirations, and we seek to do this by always applying BeGreen's 360° Sustainability Concept across our business activities.

The United Nations Sustainable Development Goals provide objectives for the positive impacts we aim to achieve. We will conduct our business consistently with the United Nations Guiding Principles on Business and Human Rights and the ten Principles of the Global Compact, in the manner as set out in our Human Rights Policy. We support the Paris Climate Agreement and the UN Sustainable Development Goals.

### BeGreen's Values

Our mission, and how we work to achieve this, is underpinned by our core values:

- **Integrity:** We are always regarded as a sincere and trusted developer. We respect our commitments and act with integrity in everything we do.
- Exceed expectations: We always aim to deliver beyond what is expected of us.
- Inclusive: We prioritize involvement and listen to concerns expressed by our communities and other stakeholders. Our actions are always undertaken with respect for our social and physical environment.
- Impact: We strive to effect positive change in all we do, based on our 360-degree sustainability concept.
- Scalable: We work innovatively, and aim to conceptualize our work, so that it can be scaled.

# **Policy Scope**

This ESG Policy applies to BeGreen (BeGreen ApS) and is valid for all subsidiaries and third-party assets managed or operated by BeGreen. BeGreen's ESG Policy sets out our commitments to sustainability, responsible business practices, and transparency. How we operate to achieve these is underpinned and guided by the commitments and expectations set out in our Code of Conduct.

### **Environmental Stewardship**

We acknowledge our environmental responsibility to ensure that our activities within all our operations do not cause harm to the environment, and that we have a societal responsibility to be responsible actors in the communities in which we operate. We are committed to:

- Contributing to the sustainable energy transition by producing renewable energy responsibly.
- Systematically assessing our environmental impact for the whole life cycle of our developments, and continuously striving to improve environmental performance and mitigating any negative impacts.
- Supporting the goals of the Paris Agreement, with a net-zero 2050 ambition, and setting climate targets and action plans to achieve this.
- Assessing future climate risks and mitigating potential impacts of climate change of our activities.
- Striving to ensure our projects are always nature positive through ecological enhancement and ongoing improvement through feasible and targeted environmental initiatives.



- Optimizing energy and resource efficiency and usage across the business.
- Minimizing waste generation in our activities through responsible waste management practices, always applying the waste hierarchy principles: prevent first, reuse, recycle, recover, and disposal as a last option.
- Incorporating scientific research into our decision making, and where meaningful, seeking partnership with academia to drive improvement.

# **Social Responsibility**

# Health and safety

BeGreen's safety and security vision is zero harm. We are committed to:

- Maintaining and promoting a work environment which is healthy, secure and safe, aiming to have no
  incidents that harm people, or put neighbours or operations at risk.
- Complying with all relevant health and safety laws.
- Conducting business in a manner that protects the health and safety of our employees and stakeholders in our supply chains.
- Maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks.

# **Equality, Diversity and Inclusion**

We are committed to:

- Providing an inclusive environment recognised for its equality and diversity.
- Treating everyone fairly, and with respect and dignity.
- Providing working conditions for our employees that offer the opportunity for ongoing learning, personal development, and prosperity.
- Fostering, cultivating, and preserving a culture of diversity, equity, and inclusion in our workplace.

### Local communities

Timely and meaningful engagement with potentially affected stakeholders, including through appropriate and effective grievance mechanisms, is a central element of our commitment to assess actual and potential human rights impacts of our activities or business relationships. It is our responsibility to ensure that potential impacts of BeGreen developments on local communities and neighbours are thoroughly assessed, and where needed, appropriate and mitigating actions taken.

- We aim, as a minimum, to avoid causing or contributing to negative impacts on the human rights, and health and safety of those potentially affected by our work.
- We engage relevant stakeholders at an early stage to provide meaningful opportunities for their views to be considered in relation to planning, design and decision-making for our projects.
- In our dialogue and engagement with stakeholders we seek to understand their expectations and to explore opportunities for mutual benefit. Solutions must be relevant to our business needs and local conditions and comply with our values, policies and local regulations.
- Our contribution to communities may include direct and indirect employment, procurement of goods and services, infrastructure development and competence building as well as social investments.
- Where we have caused or contributed to adverse human rights impacts, we will provide or cooperate in providing appropriate remediation.



### **Human and Labour Rights**

We acknowledge that BeGreen's business operations and our supply chains have a global footprint. We recognize our responsibility to operate with respect for human rights, as all people deserve to be treated equally, and with respect and dignity. BeGreen is committed to protecting human rights, enforcing fair labour practices, and addressing the potential risks of forced or compulsory labour, child labour, human trafficking and slavery across our supply chain. Our Human Rights commitments and how we work with these are elaborated upon in BeGreen's Human Rights Policy.

### **Ethics and Governance**

BeGreen's corporate governance model is designed to ensure ethical business practice and support transparency and compliance with regulations.

### **Ethical Business Practice**

At BeGreen, we believe that the rule of law and absence of corruption are preconditions for sound business and well-functioning societies. We commit to work against corruption in all its forms, including bribery and facilitation payments, as outlined in The United Nations Convention against Corruption. We have zero tolerance of bribery, fraud and other types of inappropriate business behaviour, as outlined in our Code of Conduct. We commit to complying with all applicable laws and regulations and expect all our business partners to do the same. BeGreen shall ensure that all employees have the necessary knowledge of and training in how to comply with the company Code of Conduct.

We act with integrity in all our business dealings by committing to maintain strong corporate governance practices through exemplary board stewardship, management accountability, and proactive risk management and mitigation. We recognise the role that tax plays for society to develop sustainably, and we commit to complying with the intent and the letter of tax law.

We pledge to maintain high ethical standards, as outlined in our Code of Conduct, and leadership that promotes a culture of integrity. This includes cultivating strong stakeholder relationships through transparency, open communication, and responding to stakeholder input.

We believe in holding ourselves publicly accountable to our commitments. We commit to monitoring and analyzing our environmental, social and governance performance and impact across the business. We publish information about our ESG performance on a regular basis through relevant channels as well as in our annual reporting. We are committed to transparency and accuracy in all our dealings, and we will provide full, fair, accurate and understandable disclosures in our financial and non-financial reports, in documents filed with regulatory authorities and in other public communication.

## **ESG** Roles and Responsibilities

BeGreen pledges to integrate ESG into our governance structures to ensure the principles outlined in this document, and our Code of Conduct, are incorporated and effectively implemented in accordance with corporate governance best practices.

We acknowledge that ESG issues can change over time, and we are committed to regular reviews of our materiality, policies and priority areas to ensure they remain relevant and to enhance performance. These priority areas are formulated based on ongoing review and stakeholder consultation, and the framework for their implementation is outlined in BeGreen's ESG Strategy.

BeGreen's ESG Committee, chaired by BeGreen's CEO, meets regularly to set goals, budgets, and implementation timelines and monitor progress and results related to our ESG commitments and strategy.



BeGreen's Board of Directors oversee our policies and operational controls for environmental, health, safety and social risks. This includes reviewing and approving BeGreen's policies, Codes, and strategies as well as reported material ESG information.

BeGreen's Executive Management and ESG Committee are responsible for assisting with the management of matters related to our ESG commitments and their integration within our subsidiaries and third-party assets managed or operated by BeGreen. Such matters include ensuring the entity's contractual shareholder rights are protected, and managing relevant stakeholders, such as regulators, tax authorities, and auditors in an open and co-operative manner. To this end, and as required, the Board has delegated authority to the Head of ESG and Compliance to engage actively with the management of subsidiaries, investee companies, and third-party assets managed by BeGreen to ensure that BeGreen's high standard of ESG is a focal point.

BeGreen is thus committed to integrating ESG principles in all aspects of our business. In doing so, we aim to make a positive and sustainable impact, while delivering long-term value to all our stakeholders.

# Suppliers and business partners

At BeGreen, we are committed to delivering the highest quality products and services without compromising our social, environmental, and ethical business standards. Our performance in these areas is also highly dependent on the collective performance of our suppliers and business partners. We are therefore committed to working with suppliers and business partners with sustainability and ethical performance commitments aligned to our own commitments.

We expect our suppliers and business partners to comply with applicable laws, respect internationally recognised human rights and adhere to ethical standards which are consistent with our ethical requirements when working for or together with us, as set out in this document and in our Code of Conduct. We seek to work with others who share our commitment to ethics and compliance, and we manage risk through in-depth knowledge of our suppliers, business partners and markets.

# Raising a Concern

At BeGreen, we encourage transparency and honesty, and we commit to providing a safe environment for our employees, suppliers and business partners to voice concerns, report misconduct, violations or who require assistance. If employees, business partners or suppliers see or suspect behaviour that violates BeGreen Policies, Code of Conduct, or the law, we depend on them to report it to BeGreen. Reports can be made anonymously, and all cases are kept confidential, whether names are provided or not. Any concerns or illegal or unethical business behaviour, can be reported through BeGreen's "Raising a Concern" procedure.

BeGreen, in turn, acknowledges its responsibility to respond and to protect those reporting concerns from any retaliation, and we will honour this responsibility. BeGreen prohibits retaliation against any employee who, in good faith, seeks help or reports known or suspected violations of the Code of Conduct.