

ГРУПА КОМПАНІЙ SPP DEVELOPMENT UKRAINE*SPP Development Ukraine Group of Companies***ПОЛІТИКА СТАЛОГО РОЗВИТКУ ТА ОХОРОНИ
ДОВКІЛЛЯ****SUSTAINABILITY AND ENVIRONMENTAL POLICY***Двомовна редакція / Bilingual Edition (UA / EN)*

Відповідає вимогам ISO 14001:2015, Регламенту EMAS (EC 1221/2009), Директиви ЄС про корпоративну звітність зі сталого розвитку (CSRD) та Європейських стандартів звітності зі сталого розвитку (ESRS), а також рамці звітності GRI (Global Reporting Initiative)

Назва компанії / Company	Група компаній SPP Development Ukraine / SPP Development Ukraine Group of Companies
Дата затвердження / Effective date	15 березня 2026 р. / 15 March 2026
Версія / Version	2.0 / 2026
Статус / Status	Затверджено / Approved
Відповідальний підрозділ / Responsible unit	Департамент зовнішніх зв'язків, відділ сталого розвитку / External Affairs Department, Sustainability Division
Затверджено / Approved by	Директор з розвитку бізнесу / Chief Business Officer — Надія Петрученко / Nadiia Petruchenko
Місце видання / Place of issue	м. Київ, Україна / Kyiv, Ukraine
Періодичність перегляду / Review cycle	Щорічно, або за потреби / Annually, or as required

ЧАСТИНА II

ENGLISH VERSION

1. Introduction

The Sustainability and Environmental Policy (hereinafter — the "Policy") is an official document of SPP Development Ukraine Group of Companies (hereinafter — the "Company") and a defining element of the Company's environmental management system, implementing environmental protection measures in accordance with the principles of the EMAS Regulation (EC 1221/2009) and the ISO 14001:2015 standard.

As a company that designs, builds, and operates renewable energy facilities — solar, wind, hybrid power plants, and battery energy storage systems (BESS) — the Company recognises its particular responsibility to the environment and society: the infrastructure it creates must not only meet the highest environmental standards during construction and operation, but by its very nature contribute to the decarbonisation of Ukraine's energy system and its integration with the energy system of the European Union.

The document defines the Company's strategic priorities and operational activities aimed at preventing adverse environmental impacts, improving environmental performance, applying the best available technologies (BAT) and management practices, ensuring the rational and safe use of resources and materials, conducting scientific research on biodiversity objects, preserving the species composition of ecosystems in project implementation areas, and ensuring sustainable development across all areas of the Company's activities.

The Policy includes commitments to protect the environment, fulfil undertaken obligations, and continuously improve environmental management to enhance environmental performance; it has been developed in accordance with the requirements of ISO 14001:2015, the EMAS Regulation, the EU Corporate Sustainability Reporting Directive (CSRD, 2022/2464), the European Sustainability Reporting Standards (ESRS), and the Global Reporting Initiative (GRI) reporting framework.

The Policy is maintained as documented information, is put into effect by order of the Company's Chief Business Officer, and is reviewed for relevance at least once a year at a meeting of the Sustainability Committee.

Communicating the Policy to Staff

Senior management communicates the Policy to staff by:

- publishing it on the Company's official website (sppdevelopment.com.ua);
- obtaining acknowledgement of familiarisation from personnel;
- briefing newly hired employees during initial workplace induction.

Communicating the Policy to Stakeholders

The Policy is communicated to stakeholders at the stage of tendering and procurement procedures, including subcontractors, outsourced service providers, and investment partners:

- during introductory briefings at project implementation sites;
- by incorporating relevant Policy provisions into contracts with contractors and suppliers.

The Company is aware of the consequences of its activities on the environment and makes every effort to implement the best available technologies and management practices aimed at minimising this impact and preventing potentially possible environmental risks.

The Company views environmental protection activities as an integral part of a successful business oriented towards the principles of sustainable development, the introduction of environmental opportunities, and the continuous improvement of technological and management processes in order to preserve the environment for future generations.

Environmental protection activities are integrated into the business processes of the Company's operational and investment activities and are aimed at preventing environmental pollution and minimising adverse impacts at all stages of project implementation — from design and pre-project studies to construction, operation, maintenance, and decommissioning of generation facilities.

The Company's senior management bears responsibility and guarantees that environmental management meets the requirements of ISO 14001:2015, is integrated into the business process management system as one of its components, and is intended to manage environmental aspects, fulfil mandatory requirements, and address risks and opportunities related to the Company's environmental activities.

Articles 11 and 191–193 of the Treaty on the Functioning of the European Union (TFEU) define the European Union as the body responsible for environmental policy. These provisions empower the EU to take action in key areas such as air and water pollution, waste management, and climate change — standards that the Company regards as a benchmark for its own activities, regardless of the geography of projects.

2. Company Role and Responsibilities

Group Structure and Allocation of Responsibilities

SPP Development Ukraine Group of Companies comprises the parent company LLC "ESPEEPI Development Ukraine" and the engineering company LLC "ESPEEPI Engineering", which acts as an EPC contractor (design, supply, construction). Corporate rights to each project in the Group's portfolio belong to the Company.

The Company's responsibilities are defined by its role as initiator, developer, executor, and operator of renewable energy and energy storage projects. The degree of the Company's responsibility is established depending on the nature and scale of the project, as well as the characteristics of interaction with stakeholders, including government authorities, local communities, contractors, and financial institutions.

The Company may decide not to implement a particular project or its individual components for environmental or social reasons, if the identified impacts and risks exceed acceptable limits and may adversely affect the stated objectives. The Company maintains an internal list of restricted or

excluded activities that are not consistent with the principles of sustainable development, corporate environmental policy, or applicable legislation.

In cases where projects are partially or fully financed through international donor or partner programmes, the Company ensures that such projects comply with internal standards and also fulfils additional donor requirements related to environmental, social, or other aspects of sustainable development. Such requirements are implemented on the basis of agreed terms in relevant agreements or memoranda.

In addition to implementing external projects, the Company adheres to proper environmental and social management standards in its own current and operational activities. This includes:

- integration of environmental safety principles into daily business processes;
- building an objective, systematic, multi-level, and comprehensive environmental monitoring framework;
- adherence to the principles of transparency and accountability;
- continuous professional development of personnel and training in the field of environmental protection and sustainable development.

All projects developed, implemented, or managed by the Company are structured in accordance with the provisions of this Policy, the requirements of current Ukrainian environmental legislation, and international environmental standards, where applicable to a specific project.

The Company strives to ensure that its projects comply with the principles, practices, and core environmental protection standards, including EU standards, regardless of the geographical location of projects. Where national legislation requirements differ from international standards, the more stringent ones apply.

The Company does not implement projects that contradict national legislation or Ukraine's international environmental obligations. All projects undergo independent state comprehensive expert review and, where required, an Environmental Impact Assessment (EIA) procedure in accordance with the Law of Ukraine "On Environmental Impact Assessment".

The causes and consequences of climate change are taken into account in the Company's activities. The Company, by the very nature of its business profile — construction of solar, wind, and hybrid generation facilities, as well as energy storage systems — is an active participant in adapting Ukraine's energy system to climate change; it invests in renewable energy sources and modernises energy infrastructure to reduce greenhouse gas emissions.

At the pre-project stage, a detailed analysis of the ecological network is carried out, followed by research into biodiversity objects, which contributes to ecosystem preservation. All Company projects include measures for the protection of biodiversity, living natural resources, and ecosystem restoration — taking into account the no net loss principle and, where possible, achieving a net gain.

The Company coordinates environmental protection measures to protect groundwater from depletion and contamination.

At each stage of project implementation (design, construction, operation, maintenance, decommissioning), the relevant SPV ensures compliance with waste management requirements, namely the development of waste management programmes and plans aimed at preventing waste generation and maintaining waste generation facilities in proper sanitary and technical condition in accordance with the Zero Waste principle, which promotes safe consumption and rational use of natural resources.

In its supply chains, the Company identifies and minimises environmental and social risks, establishes a hierarchy of financial and non-financial criteria, which promotes effective cooperation with reliable contractors and suppliers who share the corporate values of sustainable development.

The Company views partnerships with other enterprises, banks, donors, or government authorities as an opportunity to share experience, introduce environmental innovations, and achieve synergies in managing sustainable projects.

3. Purpose and Scope

This Policy reflects the Company's firm commitment to environmental responsibility, climate leadership, and sustainable development. It is aligned with the European Green Deal, EU environmental legislation, international declarations, and best available practices and technologies, and extends to all Company operations, its divisions, subsidiaries, and project companies (SPVs), employees, contractors, suppliers, and stakeholders.

The Company seeks to integrate environmental sustainability principles into all aspects of decision-making in order to reduce environmental impacts and risks, improve performance, introduce environmental opportunities, and promote the development of a climate-neutral, circular, resource-efficient, and nature-positive economy of Ukraine.

The Policy extends to all Company facilities, its subsidiaries and project companies, employees, contractors, and suppliers. For partners and stakeholders, it serves as a guide in developing solutions that affect the state of the environment and ensures the achievement of defined environmental objectives.

4. Environmental Governance and Responsibility

Environmental leadership is implemented at the highest level of Company management. The Chief Business Officer is responsible for the approval, implementation, and execution of this Policy, and the Authorised Representative for Environmental Management, appointed by order, bears responsibility for achieving the defined environmental objectives.

The working group and environmentally responsible persons coordinate the planning, implementation, monitoring, and improvement of the Policy in interaction with other functional divisions of the Company.

The Company's senior management demonstrates the importance of an effective Environmental Management System (EMS) and its commitment to effective environmental protection activities by:

- personal responsibility for the consequences of the Company's production activities on the environment and for the effectiveness of environmental management as a whole;
- forming, publishing, and periodically updating the Policy in accordance with strategic objectives and the needs of society, the environment, and business;
- ensuring the integration of environmental management requirements into the Company's business processes;
- providing environmental protection activities with the resources necessary for their implementation;
- promoting continuous improvement of the environmental management system;
- supporting other management roles to demonstrate their leadership in the area of environmental management;
- raising environmental awareness among all personnel.

5. Key Environmental Commitments

The Company commits to:

- comply with all applicable environmental laws, regulations, permits, and international standards;
- prevent pollution and minimise adverse environmental impacts across the full project lifecycle;
- continuously improve environmental performance and the effectiveness of the Environmental Management System;
- set and pursue measurable environmental objectives and key performance indicators (KPIs);
- apply the best available technologies (BAT) and management practices;
- promote circular economy principles and rational use of natural resources;
- protect biodiversity and ecosystems in all areas of project activity;
- engage transparently with stakeholders on environmental matters;
- integrate climate risk assessment into strategic and investment decision-making.

6. Legal and Regulatory Compliance

The Company is committed to full compliance with applicable environmental legislation of Ukraine and relevant EU directives, regulations, and standards, including but not limited to:

- ISO 14001:2015 — Environmental Management Systems;

- EMAS Regulation (EC 1221/2009);
- EU Corporate Sustainability Reporting Directive (CSRD, 2022/2464);
- European Sustainability Reporting Standards (ESRS);
- GRI Sustainability Reporting Standards;
- Law of Ukraine "On Environmental Impact Assessment";
- Law of Ukraine "On Waste";
- Law of Ukraine "On Nature Conservation";
- Paris Agreement on Climate Change;
- UN Sustainable Development Goals (SDGs).

Where national legislation requirements are less stringent than international standards, the Company applies the more stringent requirements. The Company maintains an up-to-date register of applicable legal and other requirements and ensures timely assessment of changes in regulatory requirements.

7. Stakeholder Engagement

The Company actively engages with all relevant stakeholders — including local communities, government authorities, investors, contractors, NGOs, and the general public — on environmental matters throughout the project lifecycle.

Stakeholder engagement mechanisms include:

- public consultations during the Environmental Impact Assessment procedure;
- regular reporting on environmental performance through the Company's website and sustainability reports;
- communication of environmental requirements to contractors and suppliers through contractual provisions and induction briefings;
- participation in industry forums, working groups, and international platforms on sustainability and climate;
- annual Communication on Progress (CoP) submission under the UN Global Compact.

The Company maintains a grievance mechanism to receive, process, and respond to environmental complaints and concerns raised by stakeholders in a transparent and timely manner.

8. Environmental Objectives and KPIs

The Company establishes, implements, and regularly reviews environmental objectives and key performance indicators at the corporate and project level, consistent with this Policy and the requirements of ISO 14001:2015.

Environmental objectives are developed to address the Company's significant environmental aspects and impacts, applicable legal requirements, and the expectations of interested parties. They are:

- specific and measurable;
- assigned to responsible persons and divisions;
- supported by action plans with defined timelines and resources;
- monitored and reported on a regular basis.

Key areas for environmental objectives include greenhouse gas emissions, energy consumption, waste generation and management, water use, biodiversity, and supply chain environmental performance.

9. Environmental Aspects and Impacts

The Company identifies and evaluates environmental aspects, impacts, risks, and opportunities of its activities in accordance with a systematic procedure aligned with ISO 14001:2015 and the European Sustainability Reporting Standards (ESRS):

- climate change and energy consumption;
- air, water, and soil pollution;
- water and marine resources;
- biodiversity and ecosystem conservation;
- waste management;
- resource use and circularity.

These issues are integrated into the Company's broader sustainability strategy and are regularly reviewed in light of stakeholder expectations and changes in the regulatory environment.

Both negative environmental aspects (pollutant emissions, contamination, waste management issues) and positive ones (landscaping, land restoration, secondary use of resources and waste, greening) are considered in the assessment.

The identification and assessment of the Company's environmental aspects, impacts, risks, and opportunities includes:

- analysis of mandatory requirements related to environmental aspects;
- identification of all Company processes, activities, and services that may interact with the environment and which the Company can manage or influence;
- determination of environmental aspects and impacts on the environment;

- assessment of environmental aspects and identification of significant aspects, impacts, risks, and opportunities for subsequent formulation of environmental objectives and development of environmental protection plans and programmes.

A process approach is applied when identifying environmental aspects, taking into account the Company's previous, current, and future (planned) activities.

10. Environmental Management Systems

The Company maintains and continuously improves its environmental management system in accordance with ISO 14001:2015, enabling it to systematically identify, control, and reduce environmental risks by:

- establishing environmental objectives and key performance indicators (KPIs);
- integrating environmental control mechanisms into business processes;
- conducting risk assessments and scenario analyses, including with regard to physical and transitional climate risks.

11. Monitoring, Measurement, and Assurance

To avoid the risk of greenwashing, the Company:

- establishes measurable objectives for each environmental area;
- tracks progress using standardised indicators and performance metrics;
- conducts regular internal reviews and external audits;
- reports annually on sustainability progress through the submission of a Communication on Progress (CoP) under the UN Global Compact.

The Company systematically monitors the implementation of all environmentally significant projects throughout the entire project lifecycle — from preparation to end of operation. The scope and frequency of monitoring are determined based on the level and scale of environmental impacts and risks, territorial coverage, community interaction, and engagement of external stakeholders.

The basis for monitoring includes:

- approved internal policies and standards;
- environmental and social action plans (ESAPs);
- waste management plans;
- permit documentation conditions;
- biodiversity research findings;
- oversight and analysis of post-project monitoring measure implementation;

- reporting requirements to financial institutions or government authorities.

Company divisions responsible for project implementation submit annual reports (or on a separate schedule) on environmental and social performance, ESAP implementation results, and compliance with relevant standards. Reports are analysed by the relevant Company division or engaged external auditors where required.

In the event of identified non-compliance with environmental or social obligations, the Company:

- develops and agrees corrective actions with responsible divisions;
- sets deadlines and identifies persons responsible for the implementation of such measures;
- conducts follow-up verification of implementation results.

If corrective measures are not completed within the set deadlines or there is no progress, Company management has the right to:

- suspend certain works within the project;
- initiate an internal investigation;
- apply impact measures in accordance with internal procedures.

For projects with elevated risk or strategic significance, the Company may conduct unplanned internal reviews and audits involving environmental specialists, other relevant departments, legal or financial services, and may engage independent external experts.

In the event of a change in project status (e.g., a change of contractor, right-holder, or restoration of corporate control over a facility), monitoring conditions may be revised on a case-by-case basis. The objective is to ensure actual project compliance with the Company's environmental objectives in light of the new circumstances.

12. Training and Resources

The Company commits to developing internal capacity, environmental awareness, and literacy among staff by:

- mandatory training of all employees on this Policy and its practical implications;
- specialised training for employees responsible for environmental activities;
- allocating sufficient financial and human resources to achieve environmental objectives.

The Company distributes functions, responsibilities, and resources for the effective implementation of the Policy and ensures sufficient staffing capacity and expert competence to assess, monitor, and manage environmental impacts at the stages of project activity, construction, operation, maintenance, and decommissioning of facilities.

The Company develops and implements its own framework documents, standards, and internal guidelines (instructions, protocols, guides) that detail the procedures for environmental

management, impact assessment, incident response, and sustainability assurance. All responsible employees undergo regular training on the implementation of this Policy and related procedures.

To ensure strategic alignment and consistency in the application of environmental standards, the Company may establish an Advisory Board or working group on environmental and social sustainability. Such a body is engaged in reviewing strategic matters (planning new facilities, evaluating innovations, changing environmental policy) and analysing complex projects requiring an interdisciplinary approach or with an elevated environmental impact.

Environmental training materials are included in the Environmental Day programme and other environmentally themed events. Additional training is conducted on designated environmental dates, including during the observance of international and national environmental events. World Environment Day, established by the UN in 1972, is celebrated annually on 5 June, and in Ukraine the main national environmental day is Environment Day, traditionally held on the third Saturday of April pursuant to a Presidential Decree of 1998.

Additional training is conducted in the following cases:

- introduction of new or modification of existing processes, materials, or equipment; identification of new significant environmental aspects, impacts, or risks; implementation of measures under biodiversity conservation monitoring programmes;
- introduction of new mandatory legislative requirements or standards.

The following documentation is prepared to confirm that training has been conducted:

- attendance register for training sessions;
- register of reviewed policy documents;
- relevant induction log;
- attendance registers for Occupational Safety Day and Environment Day.

Where the training programme provides for knowledge assessment, appropriate testing is conducted.

13. Supply Chain and Third Parties

The Company extends its environmental requirements, criteria, and approaches to all suppliers, contractors, and business partners. This includes:

- compliance with the Supplier Code of Conduct;
- conducting environmental due diligence during procurement;
- encouraging third parties to disclose information about their own environmental performance and to implement equivalent environmental standards.

14. Public Transparency and Availability

This Policy and data on the Company's environmental activities are publicly available on the Company's official website and in sustainability reports. The Company commits to:

- disclosing both positive and negative environmental impacts;
- annually updating information on emissions, resource consumption, waste management, biodiversity status, the implementation of monitoring measures, and the achievement of environmental objectives;
- engaging with stakeholders on environmental matters to promote dialogue and trust.

All Company personnel and personnel of contracting organisations performing works or providing services at Company facilities must be familiarised with:

- this Policy;
- significant environmental aspects related to the performance of work tasks and responsibilities;
- actual or potential environmental impacts;
- requirements for managing environmental aspects, impacts, and risks;
- environmental objectives and measures for their achievement;
- planned actions in the event of potential emergency situations or environmental risks;
- their own contribution to environmental management effectiveness, including the benefits of enhanced environmental performance;
- the consequences of non-compliance with environmental management requirements, including legislative requirements.

15. Final Provisions

This Policy is not a static document. It:

- is reviewed at least once a year or as required — in the event of changes in legislation, science, or the Company's activities;
- is reviewed in consultation with stakeholders and subject-matter experts;
- is updated to comply with current requirements and best practices.

This Policy enters into force from the moment of its approval by the Company's Chief Business Officer and is mandatory for compliance at all levels and in all divisions of SPP Development Ukraine Group of Companies.

16. Climate Change Policy (in accordance with ESRS E1)

Climate Objectives and Commitments

- The Company declares the goal of achieving climate neutrality no later than 2050.
- In its activities, the Company is guided by the principles of the Paris Climate Agreement, UN Sustainable Development Goal No. 13 (Climate Action), and science-based approaches (Science Based Targets).

Climate Risk Assessment

- The Company conducts regular identification and analysis of physical and transitional climate risks.
- Risks are taken into account when developing strategic plans, investment decisions, and assessing operational activities.

Greenhouse Gas Emissions Accounting

- The Company is progressively implementing a greenhouse gas emissions accounting system in accordance with the GHG Protocol principles (Scope 1, 2, 3).
- Accounting is maintained with reference to a base year for subsequent trend analysis and the formation of climate KPIs.

Climate KPIs and Monitoring

- Climate performance monitoring is conducted annually within the overall environmental management system.
- The performance indicator system includes: volume of CO₂-equivalent emissions, share of renewable energy sources in commissioned capacity, and investments in climate solutions.

Transition Plan

- The Company is developing a climate transition plan that includes a phased approach to emissions reduction, expansion of RES capacity, and improvements in energy efficiency of its own facilities.
- The plan takes into account financial, technical, and regulatory aspects and forms part of the Company's corporate ESG strategy.

17. Biodiversity and Ecosystems Policy (ESRS E4)

Objectives

The Company conducts scientific trials, preliminary and detailed analysis of the ecological network, as well as biodiversity objects — plants, animals (including birds), and microorganisms that, in conditions of natural freedom, are found in certain territorial and resource concentrations on sites where the Company plans or carries out activities.

Assessment of Impacts and Risks

The Company assesses the possible impact of planned activities at all stages of implementation — design, construction, operation, maintenance, and decommissioning (cessation of operation) — on biodiversity objects.

The Company anticipates the implementation of measures to preserve the species composition and the existing state of the ecosystem, and where necessary — the application of best available methods aimed at the rational use of resources, improvement, and restoration of the state of the ecosystem.

Biodiversity Object Accounting

Accounting is maintained taking into account identified biodiversity objects, baseline study results and current state assessment, comparative analysis, and the formulation of interpreted conclusions that model the state of the ecological network and the ecosystem as a whole.

Biodiversity Object Monitoring

- development of a monitoring plan;
- definition of a programme of measures aimed at balancing the ecological system, controlling the ecological network, and preserving the species composition of biodiversity objects;
- documentation of information, preparation of a monitoring report, and establishment of performance criteria.

18. Circular Economy Policy (ESRS E5)

Objectives

The Company ensures the streamlining, improvement, optimisation, and standardisation of waste management processes at each stage: collection, transportation, recovery, and disposal of waste; establishes criteria that allow for the systematisation of the waste generation process from waste identification to transfer to a specialised organisation; maintains reliable records of waste generated as a result of activities; and submits relevant reports.

Assessment of Impacts and Risks

In accordance with the requirements of Articles 17 and 26 of the Law of Ukraine "On Waste" and the Resolution of the Cabinet of Ministers of Ukraine of 01.08.1999 No. 2034 "On Approval of the Procedure for State Registration and Certification of Waste", a technical waste passport is drawn up for each type of waste generated at Company facilities in the form established by standard DSTU 2195-99. At the waste identification stage, the Company assesses the impact through analysis of the physicochemical and granulometric composition, as well as the containing components that determine the hazard class of the waste, and where necessary — additional studies to establish the chemical properties, the number of fractions, and the presence of a resource-valuable component in its composition.

Waste Management Process Accounting

The Company implements waste management operations at each stage of waste management — collection, transportation, transfer to a specialised organisation — in accordance with approved internal procedures.

Waste Management System Monitoring

The Company ensures that waste generation facilities are maintained in proper sanitary and technical condition in accordance with the requirements of applicable legislation and internal standards.

APPROVED / ЗАТВЕРДЖЕНО

Document	Sustainability and Environmental Policy
Version	2.0 / 2026
Effective date	15 March 2026
Approved by	Nadiia Petruchenko Signature: _____
Title	Chief Business Officer
Date	15 March 2026

