Photon Energy Group

Sustainability Report 2024

Contents

Overview

1. Overview

Clean energy and water. The fundamentals of life.

1.1 About Photon Energy Group

Delivering the fundamentals of life

Photon Energy N.V., ID 51447126, is a joint-stock company incorporated under the laws of the Netherlands on 9 December 2010. The statutory seat of the company is Barbara Strozzilaan 201, 1083HN Amsterdam, with offices in Australia and across Europe (hereinafter referred to as "the Company" or "the Group"). Photon Energy N.V., the holding company for Photon Energy Group, is listed on the Warsaw, Prague, and Frankfurt Stock Exchanges. The sustainability report of Photon Energy Group is prepared as of 31 December 2024.

We take a holistic approach to our work, within our companies and as a group, offering solutions that can be delivered separately or as an integrated package. This allows us to meet the complete needs of our customers and brings us closer to a world where energy and water – the fundamentals of life – are clean, safe, and accessible to all. We deploy technology to provide these fundamentals and help build a thriving, sustainable world.

Photon Energy

Photon Energy provides comprehensive solutions to support the generation of clean energy and the successful integration of renewables into the power supply.

Photon Water

Photon Water provides clean water solutions ranging from lake management and algae control to the treatment of drinking water and wastewater.

Photon Remediation

Photon Remediation provides advanced environmental clean-up solutions to remove PFAS and other contamination, enriching both ecosystems and communities.

Photon Energy Group

- Founded in **2008**
- **330+** employees
- Active in **9 countries**
- **129.6 MWp** proprietary portfolio
- **162.8 GWh** produced in 2024
- **66,682 t** of CO2e avoided in 2024
- **1 GWp** PV project pipeline
- **1.1 GWp** O&M portfolio

Our Values

Innovation

We think creatively to deliver solutions and actualise our vision.

Community

We believe it is our responsibility to enrich every community we are a part of.

Safety

We prioritise the health and well-being of everyone impacted by our work.

Performance

We operate with honesty and respect, and we never compromise our values.

Sustainability

We understand the importance of foresight and long-term thinking.

Integrity

We operate with honesty and respect, and we never compromise our values.

What We Do

Photon Energy

Utility-scale Solar Power and Storage

Our comprehensive solutions cover the full lifecycle of PV and energy storage systems, from project development to EPC.

On-site Solar Power and Energy Storage

We design, build and manage PV power and energy storage systems for rooftops and other property.

O&M for Photovoltaics

We provide a full range of operations and maintenance solutions for solar PV systems.

Wholesale Photovoltaic Components

Through our dedicated eShop, we supply world-class technology to PV installers across Europe.

Energy Offtake and Supply

As a licensed energy trader in six countries, we purchase and supply energy from renewable sources including solar, wind and biogas.

Energy Flexibility

We offer localised Capacity Market programs and other flexibility solutions to help optimise energy use and support grid stability.

Photon Water

Surface Water Management

We help our customers make the best, most efficient use of their water resources, such as lakes, ponds and industrial water bodies.

Remediation

We offer a range of remediation services to eliminate PFAS and other contaminants from water and soil.

Wells and Resources

We provide complete services for wells and water resources, from design to maintenance.

Water Treatment and Recycling

We design and implement industrial and municipal water treatment plants and water recycling systems.

Photon Remediation

PFAS Management and Remediation

We safely remove the forever chemicals from water, soil and biosolids, and develop management solutions to help mitigate their impact.

Environmental Remediation

We use the most advanced, sustainable methods to eliminate a wide range of contaminants, including petroleum hydrocarbons, chlorinated solvents and heavy metals.

1.2 Market Presence

PV Industry Worldwide and Our Key Markets

In 2024, 451.9 GWp of new PV installations were added globally, with China contributing 278.0 GW. Solar PV accounted for 7% of global electricity generation, with the International Energy Association (IEA) predicting continued growth. In Europe 58.8 GW of new PV power plants was added, with solar making up 22.4% of electricity generation in EU countries only.

Among Central and Eastern European (CEE) countries, Poland led in installed photovoltaic capacity, reaching 20.2 GW by the end of 2024 – an increase of 3.8 GW from the previous year. Hungary followed with 7.7 GW, adding 1.8 GW, while Romania also showed strong growth, ending the year with 4.7 GW – an increase of 1.7 GW. These figures highlight Poland's leadership in the region and position Hungary and Romania among the top-performing CEE countries in solar energy expansion.

Our key markets have shown significant growth in solar photovoltaic capacity, with substantial increases in both residential and commercial installations, reflecting strong development momentum and alignment with broader energy transition strategies.

Australia

In 2024, Australia's solar photovoltaic generation grew significantly. By September, over 3.92 million solar PV installations had a combined capacity of 38.0 GW, with rooftop installations exceeding 25 GW. Solar accounted for 19.6% (46.7 TWh) of Australia's electrical energy production in the National Electricity Market and Southwest Interconnected System. We had a significant footprint in Australia in 2024, with a portfolio of 14.6 MWp installed capacity (14.5 MWp sold in October 2024), generation of 20.1 GWh, and O&M services for 24.2 MWp.

Czech Republic

In 2024, energy providers in the Czech Republic connected 967 MWp of solar power plants to the grid, matching the previous record year. The installed capacity increased by 28% YoY, and the total number of installations grew by 27%. The total capacity of all solar power plants reached 4.2 GWp, with over 212,000 photovoltaic power plants supplying electricity, including more than 184,000 on family home rooftops. Our total portfolio in the Czech Republic includes an installed capacity of 15.0 MWp, generation of 16.0 GWh, and 117.4 MWp of O&M services.

Slovakia

Slovakia added 274 MW of solar in 2024, slightly increasing from 267 MW in 2023. Last year's deployment included 113.6 MW of residential solar, 142.7 MW of commercial-scale solar, and 17.7 MW of utility-scale solar. Our presence in the Slovakia solar market includes 10.4 MWp of installed capacity, total electricity generation of 10.9 GWh, and O&M services for 20.5 MWp.

Hungary

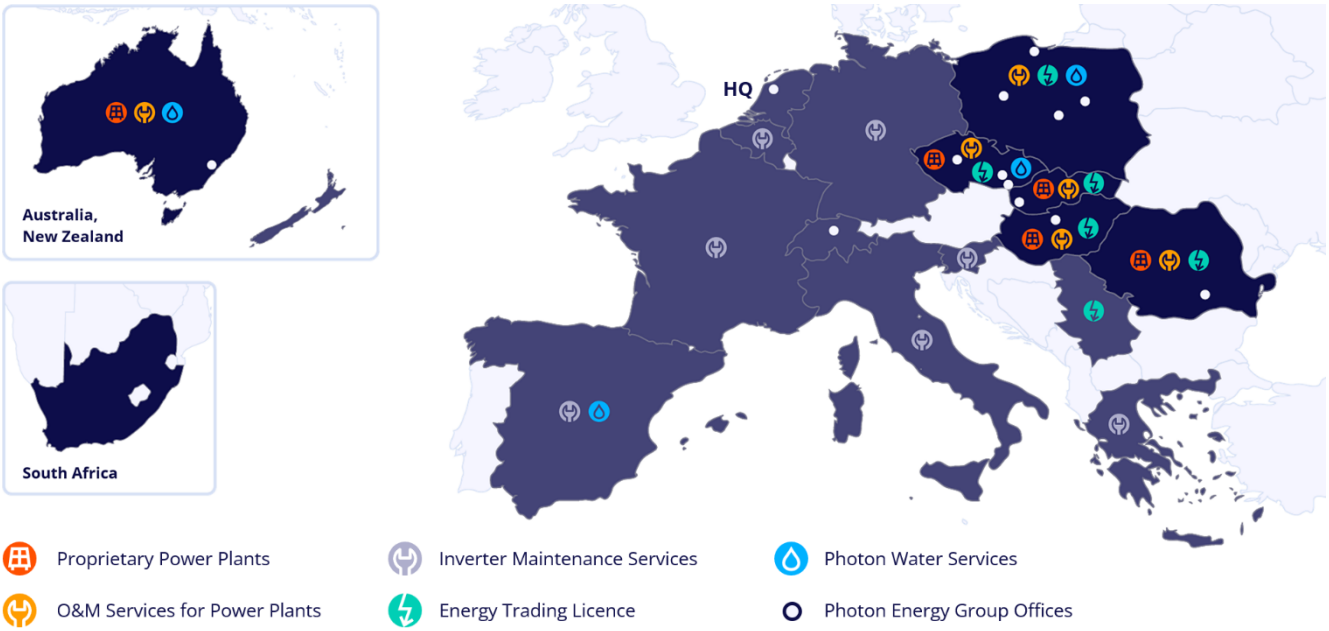
As of early 2025, Hungary's installed photovoltaic capacity reached 7.7 GW, surpassing the 2030 target. Since 2020, capacity has increased by 80%, with over 1.2 GW added annually for three consecutive years. We have strengthened our presence in the Hungarian market with an installed capacity of 52.5 MWp, total generation of 59.4 GWh, and O&M services for 393.2 MWp.

Romania

In 2024, Romania's photovoltaic sector reached 4.7 GW of installed capacity, growing by 1.8 GW from the previous year. By early 2025, 1.6 GW were in development, with an additional 2 GW expected, keeping the country on track for its 2030 targets. We have established our presence in Romania with a total of 51.6 MWp of PV installed capacity, electricity generation of 56.4 GWh, and O&M services for 87.0 MWp.

Poland

By the end of 2024, Poland's photovoltaic capacity reached 20.2 GW, with plans to reach 40 GW by 2030. This aligns with the country's broader energy transition strategy, including offshore wind, biomass, and energy storage. In 2024, solar's share in electricity generation grew from 6.76% in 2023 to 8.97%. In 2024, our O&M services covered a total of 413.2 MWp.



1.3 Our Work

Photon Energy

- **PV Project Development.** We develop or acquire photovoltaic projects at all stages of development and guide them to completion. With years of experience on a broad range of projects, and as owners and operators of our own solar power plants, we have strong expertise and a proven track record to navigate any project – from large-scale power plants to off-grid energy systems in remote communities through every stage of development.
- **EPC Solutions.** We have a proven track record of delivering engineering, procurement and construction services that can deliver any solar energy project, providing our clients with sustainable, efficient, and reliable energy as well as significant long-term cost savings.
- **Wholesale PV Components.** We procure and engineer world-class technology to fit the specific project location, design, and budget. Our services cover all aspects of the technology procurement process, including after-sales support.
- **Operations and Maintenance.** We build our assets to perform over the long term, delivering to the communities they serve. As a function of this, we provide a full range of O&M services, including monitoring and inverter maintenance. Our philosophy is to maximise environmental and financial benefits for our clients by carrying out preventative maintenance to optimise and extend the useful life of their assets. Photon Energy is an asset owner as well as a service provider; we understand our clients' needs because we provide O&M services to our own installations. The power plants we manage run with an average uptime of more than 99%.
- **Energy Offtake, Supply and Flexibility Solutions.** Through the Photon Energy Virtual Power Plant, we aggregate renewable energy resources and supply energy to consumers at competitive rates. We also provide access to energy flexibility incentives including Ancillary Services and participation in the Capacity Market.

Photon Water and Photon Remediation

- **Water Treatment.** We deliver treatment solutions around the world, including potable and wastewater treatment, hazardous liquid waste, and industrial water treatment. Our solutions are customisable and comprehensive, ranging from the treatment of drinking water to the large-scale treatment of hazardous liquid waste.
- **Environmental Remediation.** We offer a range of remediation services to eliminate contaminants from water and soil. Water and soil contamination can be harmful to local communities and the Earth itself. Through the process of remediation, we remove dangerous pollutants, leaving soil healthy and water safe to use. Different methods of remediation are available depending on the site and the type of pollutants involved. We have the expertise to assess our customers' needs and provide the safest, most effective remediation solutions.
- **Wells and Resources.** We provide complete services for wells and water resources, from design to maintenance. We have the expertise and proven track record to provide customised water well solutions using state-of-the-art technology and techniques. Our work is research-based and prioritises both safety and efficiency, grounded in our mission to ensure access to clean water for people and communities around the world.
- **Surface Water Management.** We help our customers make the best, most efficient use of their water resources, lakes, and ponds. Our work is research-based and prioritises both safety and efficiency, grounded in our mission to ensure access to clean water for people and communities around the world.

Economic Performance

At Photon Energy Group, we have adopted a set of values to ensure that our work provides consistent, long-term benefits to the people and communities where we operate, and the world at large. These values translate into a sustainable business model based on strong governance practises, strong social conduct and engagement with our stakeholders to achieve our mutual sustainability goals.

In 2024, we achieved a solid growth in consolidated revenues, reaching EUR 89.917 million (+27.3% YoY) compared to EUR 70.649 million in the previous year. This was driven by the strong performance of our solar generation assets and even greater revenue increases in other segments, particularly engineering and the new energy division. Revenues from sales of electricity grew to EUR 24.705 million (+15.4% YoY), primarily fuelled by increased electricity generation, which rose to 162.8 GWh (+16.5% YoY). This expansion was largely supported by the commissioning of 16.2 MWp of new assets in Romania and 0.7 MWp in Hungary. Conversely, the sale of 14.5 MWp in Australia had a counterbalancing effect on overall generation growth. However, as the latter transaction was completed at the end of October 2024, its impact remained limited. Regarding energy market conditions, electricity prices bottomed out in Q1 2024 and followed an upward trend until September. However, in Q4, negative regulatory changes in Romania significantly disrupted this trajectory, leading to a sharp decline in prices from EUR 173/MWh to EUR 136/MWh quarter-on-quarter. Despite these regulatory challenges, the overall performance of our generation assets remains strong with an average realised price in 2024 of EUR 157 / MWh (-3.0% YoY), demonstrating the resilience and agility of our business model.

Other revenues increased even more, by 32.4% on average, to EUR 65.212 million in FY 2024. The most significant impact came from our engineering business, where revenues increased to 17.974 million, up by 98.2% YoY, followed by our New Energy division where revenues increased to EUR 32.531 million, up by 32.7% YoY. PV technology trading saw revenues of EUR 11.283 million, down by 40.1% YoY, but it is worth noting that we observed a significant pick-up in technology trading volumes in the last quarter of 2024 and expect this trend to continue into 2025. Revenues from O&M contributed EUR 4.111 million, up by 14.3% YoY. Other segments saw revenues of EUR 1.432 million, down by 21.5% but this represents only about 2% of our

revenue mix. Overall, we believe we achieved a great deal last year—stabilising and diversifying our revenue streams, optimising our business model's risk profile, and not only expanding existing operations but also introducing new services and revenue sources to drive further growth.

On the cost side, raw materials and consumables expenses remained relatively stable at EUR 37.989 million, up by 3.0% YoY as the decline in technology sales was offset partially by increased engineering business. Personnel expenses declined by 2.8% YoY to EUR 17.954 million as a result of 4.0% decline in the employee headcount YoY.

Other expenses amounted to EUR 25.715 million, up by 136.0% YoY as a result of an increased engineering and new energy division direct costs due to increased business activity.

The above changes resulted in EBITDA of EUR 7.821 million, more than doubling year-on-year, compared to EUR 3.706 million in 2023.

Below EBITDA, we have booked a one-off gain of EUR 1.1 million related to the Maryvale Solar Farm in Australia and a book loss on disposal of investments of EUR 1.55 million in relation to the sale transaction of Australian operating assets and project rights concluded in October 2024 (for more details see our ESPI 29/2024). This impacted EBIT which amounted to a loss of EUR -2.753 million in 2024 compared to a loss of EUR -5.196 million in 2023.

Interest expenses amounted to EUR 11.543 million in 2024 and remained stable (+1.0% YoY).

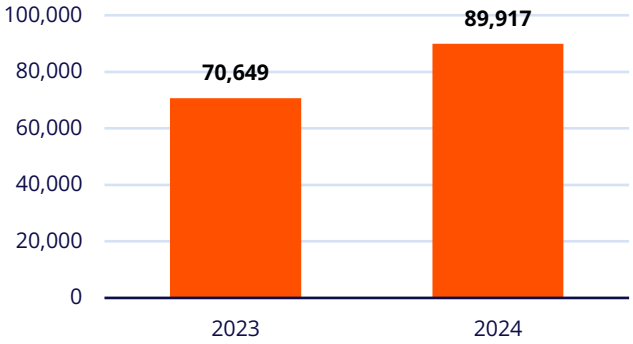
At the bottom line, the Group recorded a net loss of EUR -13.824 million in 2024. Other comprehensive income (OCI) was positive and amounted to EUR 3.763 million because of a revaluation of the commissioning of 16.9 MWp in Romania and revaluation of the existing assets, compared to EUR 15.291 million in 2023.

As a result the Group posted a total comprehensive income of EUR -9.433 million in 2024 compared to EUR -0.459 million in 2023.

Economic Indicators

In thousands of EUR	**2024**	**2023**
Total revenues	89,917	70,649
EBITDA	7,821	3,706
EBIT	-2,753	-5,196
Profit / loss	-13,196	-15,750
Total comprehensive income	-9,433	-459

Revenue Growth 2023–2024



1.4 Statement on Sustainability

Photon Energy Group values sustainability, safety, community, and innovation, taking proactive measures to prevent negative impacts, especially during the construction phase of projects. We implement strategies to compensate for potential negative impacts on ecosystems. To ensure a positive impact on the community, we have established policies and procedures that engage with local communities and collaborate with local suppliers.

Reflecting on 2024, we take great pride in the solid progress made by our team in delivering our strategy. Our power production reached 162.8 GW of clean energy from our plants, underscoring our dedication to sustainability. This achievement led to avoiding 66,682 tonnes of greenhouse gas emissions, reinforcing our role in addressing climate challenges.

Photon Energy Group projects not only add value to power generation but also contribute significantly to the communities we serve, highlighting Photon Energy Group's positive impact on people and the future.

Our business model contributes to global climate change mitigation and the transition to renewable energy. We work towards the United Nation's 17 Sustainable Development Goals 6 (clean water) and 7 (clean energy) through our commitment to providing affordable and clean energy and water for all. We are committed to the Paris Agreement, contributing to climate mitigation and the transition to 100% renewable energy sources.

We understand our responsibility to ensure that our work provides consistent, long-term benefits to the people and communities impacted by our work and to the world at large. This belief is fundamental to our ethical principles and is essential for our ongoing success and the growth of our business.

Our approach to sustainability reporting is based on operational control over the entities. The entities considered for data collection, reporting, and implementing sustainability measures are those included in the financial annual report.

This report formally expresses our commitment to delivering sustainable outcomes and provides an overview of our efforts to integrate environmental, economic, and social sustainability into our business practices, planning and decision making. It is intended to provide clarity and guidance to all our stakeholders on sustainably integrated procedures and an overall sustainable way of thinking.

We are committed to:

- The highest standards of health and safety.
- Supporting our stakeholders and their communities through the provision of renewable energy and clean water services.

- Seeking sustainable solutions and partnering with suppliers to deliver services that contribute to a more sustainable world.
- Adhering to all regulatory requirements regarding policies and standards for our operations, products, and services, including all environmental, health and safety requirements.
- Improving our performance by protecting and enhancing all aspects of our environment, as the foundation for the Company's success.
- An inclusive, engaging and socially responsible working environment for employees.
- Effectively communicating our policies to all employees and ensuring open channels of communication within our organisation.
- Providing an online grievance mechanism for reporting human rights concerns.
- Protecting the environment; continuously working to reduce negative impacts.
- Respecting fundamental human rights; avoiding adverse impacts on local communities and stakeholders.
- Opposing slavery, forced labour, child labour, and human rights violations, and protecting human rights in our supply chain.

1.5 Our Key Stakeholders

Renewables must be deployed with respect for nature, social inclusion, and in close cooperation with broader society. The impact of renewable power plants on biodiversity and local communities needs to be understood and minimised. Economic development and job creation are essential for renewable development to gain support.

Photon Energy Group's key stakeholder groups include investors, financing institutions, employees, suppliers, contractors, industry associations, governments and regulators, and local communities. We engage with stakeholders through various channels, including meetings, surveys and consultations.

Engagement activities are conducted regularly, with some stakeholders engaged on a quarterly basis, while others are engaged annually or as needed. We ensure meaningful and inclusive engagement by involving stakeholders at different levels, from local communities to international partners.

The Group's sustainability goals can only be achieved by working closely with our stakeholders. Through empowering our employees, engaging with our clients and suppliers, reporting to our investors and financial institutions and creating an open dialogue with the communities impacted by our activities, we can shape how we define and execute our strategy to create a sustainable future for generations to come.

Our Employees

Our employees are our most important asset, representing 26 nationalities working at more than 10 sites in 9 countries, across three continents. We aim to be a top employer and offer our employees valuable opportunities to grow personally and professionally. The health and safety, equity and inclusion of our people is our highest priority, and we aspire to provide an incident- and injury-free working environment for everyone. We interact with our employees through various channels, such as employee engagement surveys and an HR evaluation platform where we collect and provide feedback.

Our Clients

Our clients are one of our most important external stakeholder groups. The greater number of sustainable solutions we can provide to our clients, the more sustainable our business becomes. This requires a comprehensive understanding of our clients' specific needs. Our sales teams have a well-established relationship with our clients. We engage with our clients through tailored communication strategies, incorporating Know Your Counter-Party principles to foster strong, collaborative relationships.

Our Suppliers

We rely on the technology, equipment and services supplied by our key business partners. We work closely to develop and improve long-term synergies. We are aware of the environmental impact of our sourcing of raw materials as well as production processes. We clearly communicate our goals through our Third-party Conduct Principles, Code of Ethics and our KYC and KYS policies and procedure and expect our suppliers to reduce their potential impacts on environment and communities.

Our Investors and Financing Institution

Our financial partners, shareholders and bondholders play a significant role in the Company's growth and success. They support us in our pursuit of a long-term-oriented strategy which aims to continually create value for shareholders while offering a low-risk environment for debt holders. With our financial instruments listed on financial markets, we ensure transparent communication in compliance with regulatory requirements, share key business developments through our websites, providing an Investor Relations newsletter, and hosting live webcasts to present the Company's quarterly results.

Governments and Regulators

Governments and regulators are among our valued stakeholders. We recognise the risks associated with legislative and regulatory changes and address them through ongoing monitoring, both in-house and with external advisors. We liaise with policymakers, industry associations, and trade organisations for early notifications of regulatory changes. Employing local experts helps us understand the markets and political landscapes in which we operate, ensuring compliance throughout a project's lifecycle.

Communities

We engage with communities on multiple levels, from local authorities and residents living near our PV installations to collaborations with universities and research institutes. We also engage in philanthropic and sponsorship activities, documented by our Donation and CSR Policy, including CSR Days offered to employees. As outlined in our Code of Ethics and Donation Policy, we do not make political donations. In Australia, a dedicated website is set up right from the start of a new project to provide access to all available information regarding the project, and to enable members of the public to contact the team in charge of the project's development. In addition to these regulatory requirements, and for every projected location, we engage in preliminary discussion with local authorities as a means of ensuring projects' compatibility with territorial and community policies.

Industry Associations

We engage with industry associations by actively participating in events, where we share our stance and opinions as needed, fostering collaboration and staying informed on industry developments. Photon Energy Group is a member of the following industry associations and national or international advocacy organisations:

- Solar Association (Czech Republic)
- Resolar (United Kingdom)
- Romanian Photovoltaic Industry Association (RPIA) (Romania)
- Magyar Energiakereskedők Oversee (MEKSZ) (Hungary)
- Slovak Association of Photovoltaic Industry and Renewable Resources (SAPI) (Slovakia)
- PSF (Polskie Stowarzyszenie Fotowoltaiki/Polish Photovoltaics Association) (Poland)
- Solar Plaza (Netherlands)

- Clean Energy Council (Australia)
- Australian Land and Groundwater Association (ALGA) (Australia)

1.6 Materiality and Sustainability Focus

In adopting a strategic approach to sustainability, we address material external risks, helping us to become more resilient and adaptable in the face of challenges such as climate change, and creating a space for new ideas and creative responses. We foster innovative solutions that will ultimately position us as a thought leader in our industry.

Material topics are identified and prioritised to ensure that the potential impact on the business is considered. Furthermore, stakeholder expectations and internal strategic priorities form our analysis and shape our materiality areas and criteria. Each topic is defined by our policies and strategies, with our performance being evaluated and reported periodically.

To ensure a structured approach to sustainability priorities, we have identified material ESG topics along our value chain.

	ESG Material Areas	Design and Project Development	PV Technology Supply	Construction	Electricity Generation	Operations and Maintenance	Energy Offtake and Flexibility
E	Environmental Impact Assessment	●	●	●			
	Biodiversity Projects	●		●		●	
	Waste Management		●	●		●	
	CO_2e Savings				●	●	●
	Recycling				●		
S	Human Rights		●				
	Community Engagement	●		●			
	Health and Safety, Working Conditions			●	●	●	
	Non-discriminatory Environment, Diversity	●		●		●	●
	HR Development, Management, Engagement	●		●		●	●
G	Sustainability Management	●	●	●	●	●	●
	Ethics and Compliance	●	●	●	●	●	●

Sustainability Management

In 2020, we laid the foundation for strategic management, controlling and reporting practices that are fully geared toward sustainability. A Sustainability Department was created to work closely with the Board of Directors and representatives from several business units within the Company. The objective of the department is to monitor the strategic coordination of the Company's sustainability plans.

Our sustainability strategy creates a cohesive purpose, providing a link throughout the business that employees can identify with, as can *potential* employees, who are increasingly seeking purpose-driven organisations to work with. Another core aspect of our strategy involves engaging and supporting the communities in which we operate. The human focus of our work is an integral component of our drive to ensure the continued success and positive impact of our activities.

By displaying our values, the dedication towards sustainability development is also exhibited to customers, suppliers, and other shareholders.

Sustainability Rating

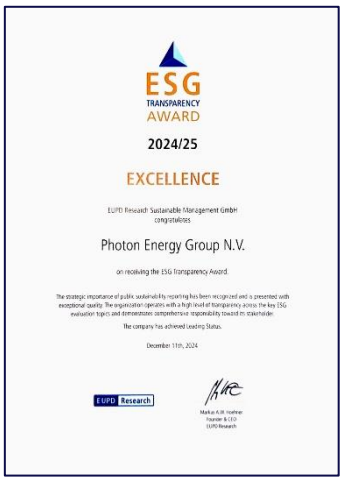
Independent sustainability ratings provide valuable feedback ensuring the highest standards while providing stakeholders with confidence in our genuine commitment to a sustainable business model. We foster a culture of continuous improvement throughout the Group, aligning with our sustainability commitment.

In 2024, we received ESG Transparency Award, an "Excellent Class" rating and being chosen as "Leading Company" in ESG transparency from EuPD Research Centre, achieving a score of 82/100. This outstanding accomplishment reflects our dedication, and we are actively working to further improve our rankings with the dedicated efforts of our Sustainability Department.

EuPD Research is a leading market and economic research company based in Germany. They specialise in primary data-driven research and consulting services across global energy markets, focusing on electricity, heat, mobility, and energy efficiency for over 23 years. EuPD Research is known for its rigorous evaluation processes and independent assessments, providing valuable insights and certifications that help companies enhance their market position and sustainability practices.

In 2023, we were awarded with a rating of "very good" by imug rating, achieving a score of 77/100. imug rating has been active in the field of sustainable finance and socially responsible investment (SRI) for 20 years. It is one of the leading sustainability rating agencies in Germany and specialist in customised ESG research.

This rating was further followed by Second Party Opinion from imug rating, confirming that the framework for our first green bond issuance aligns with the Green Bond Principles 2021.



Sustainability Priorities

In 2024, we continued our efforts to strengthen and standardise our corporate environmental and social management systems for all projects, with a focus on the following:

Environment

- Avoid or minimise our negative environmental impacts by monitoring the effects of our projects throughout all phases of development and operation and compensate for the unavoidable negative impacts.
- Continue measuring our CO_2e footprint and take accountability for our environmental impact.
- We aim to keep local biodiversity intact and ideally to promote and enhance biodiversity, and mitigate any negative impact.
- Maintain active dialogues with local communities to identify risks to and impacts on the environment prior to undertaking any project.
- Effective waste management both in our offices and on-site is a key environmental priority, reflecting our commitment to sustainability and responsible resource use.

Social

- Ensure the health, safety and overall well-being of employees and contractors as well as other stakeholders, our assets, and the environment. No accidents were reported in 2024.
- Provide support to organisations whose vision and values align with our Donation Policy. A Donation and CSR Policy was established, and the CSR Days – giving back to the community – was lunched.
- Adhere to local guidelines and regulations regarding community involvement and consultation.
- Follow our policies and procedures to ensure that sensitive data and other information of our stakeholders is maintained and protected.
- Use a comprehensive tool introduced for the collection and provision of feedback for employees and managers, ensuring clear guidelines and fostering a culture of continuous improvement and growth.

Governance

- Partner with suppliers to promote sustainable business practices and monitor compliance through regular interactions. We have stringent procurement practices and due diligence on human right, and we maintain ongoing conversations with our key stakeholders.
- Obtain and implement ISO certifications for relevant business entities.
- Reinforce our internal policies to achieve the most efficient and effective integrated management system by utilising the following performance objectives: environment, quality, and workplace health and safety. Going forward, an executive team will conduct a regular review of our internal procedures to ensure their compliance and efficacy, and to measure sustainability actions so that our goals can be adjusted when necessary.

- Strictly adhere to our corporate anti-corruption policies and maintain a zero-tolerance policy for bribery and corruption. A misconduct policy and a whistleblowing channel are in place.

1.7 Sustainability Highlights

Key Highlights

2021

1. First annual **Sustainability Report** for the year 2020.
2. First **Green Bond** issued in line with the Green Bond Principles 2021.
3. **"Very good" ESG rating** received from Imug rating. (Summary Report)
4. Tracking our **Scope 1 and 2 GHG emissions.**
5. First **ESG survey.**
6. **Code of Conduct** created.

2022

1. Tracking of selected **Scope 3 emissions** items.
2. Pilot project to test our **in-situ electrochemically enhanced nanoremediation** technology with experts from universities in Liberec and Stuttgart.
3. Creation of a **whistleblowing system** to report concerns, anticorruption training course.
4. Creation of a **donation policy,** including the establishment of CSR days for employees.
5. Combined **Employee engagement & ESG survey.**
6. **Mobility challenge** organised to encourage employees to question their commuting habits.
7. Development of **internal training course** related to insider trading and our Code of Ethics.

2023

1. **"Very good"** ESG rating recieved from **Imug rating.**
2. **3rd annual Sustainability Report** according to GRI; Tracking our Corporate Carbon Footprint according to the GHG Protocol.
3. Our **Green Bond** was tapped to EUR 80 million.
4. **Our Third-Party Conduct Principles** have been revised, strengthening our **due diligence on human rights in our supply chain.**
5. Launching the first year of **CSR days** – giving back to the community.
6. Creation of a **Stakeholder Engagement Policy,** emphasising the importance of engaging in constructive dialogue with stakeholders.
7. Employee engagement and ESG survey.
8. Implementation of **KYC policies and procedures.**
9. **ISO re-certification** for our operation and maintenance in Europe and Australia.

2024

1. We proudly received the **ESG Transparency Award** with an "Excellent Class" rating and were recognised as a "Leading Company" in ESG transparency by EuPD Research Centre, scoring 82/100.
2. Automated **Know Your Counterparty** procedure, improving efficiency and accuracy with trusted suppliers.
3. We launched **Photon Remediation,** entering the global environmental remediation market in Australia and Europe, with plans to expand to North America and Asia.
4. In May 2024, we celebrated our **cultural diversity,** highlighting our team's unique backgrounds.
5. Our team in Australia achieved a 70% to 90% **removal of PFAS** in a field trial for the Australian Government Department of Defence, showcasing our innovative solutions.
6. We launched a **new intranet** face to enhance employee engagement and communication.
7. Award from Solinteg for **outstanding technical partnership** in renewable energy solutions.
8. We **strengthened our partnership** with the Czech University of Life Sciences to enhance biodiversity in solar parks, planting native shrubs and creating habitats for local wildlife.

2025

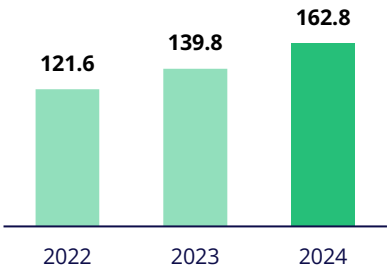
Targets and ambitions for 2025:

1. Explore and assess end-of-life solutions with our strategic suppliers.
2. Conducting life cycle assessment of projects
3. Revise our scope 3 emission calculation methodology for more accurate and comprehensive reporting.
4. Enhancing our workforce diversity thorough targeted initiatives and programs.
5. Review of existing ESG regulatory framework and implementing voluntary ESG regulations if possible.

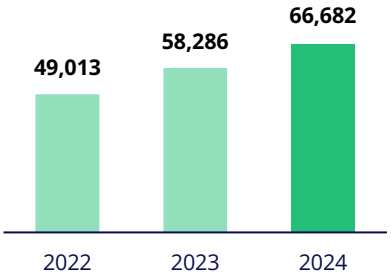
1.8 ESG Key Performance Indicators

ENVIRONMENT

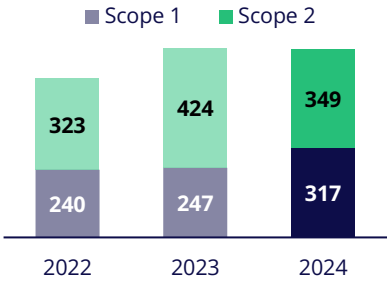
Clean Energy Generated (GWh)



CO_2e Emissions Avoided (t)

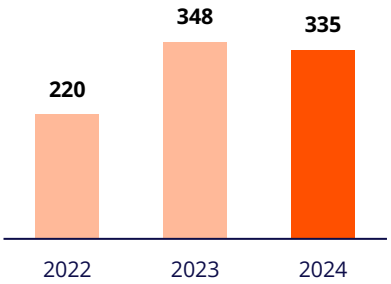


Scope 1 and 2 CO_2e Emissions (t)

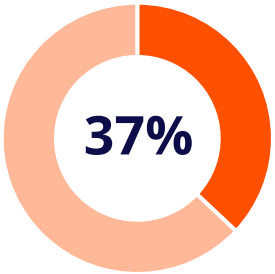


SOCIAL CONDUCT

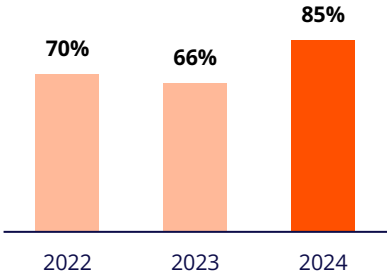
Number of Employees



Female Employees



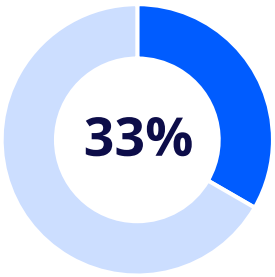
Employees Completed Training Course



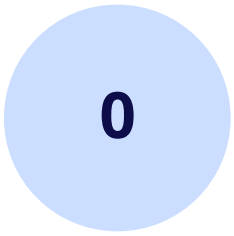
CORPORATE GOVERNANCE

Technology Purchases Subjected to Due Diligence

Female Representation in the Supervisory Board



Claims Against the Company



Detailed table in Annex.

Environment

2. Environment

Environmental sustainability is the foundation of our business model. All our work and 100% of our revenue is connected to activities that add sustainable value to the environment.

Photon Energy Group contributes to the global transition to a low-carbon society through its renewable energy generation. The new technology and installations necessary for this transformation also cause climate impacts through the production and operation of components and land use changes from solar projects.

Photon Energy Group's main purpose is to develop and operate renewable energy projects and solutions to meet global needs. Our projects provide affordable, reliable, and emission-free electricity in growth markets for about 20 to 25 years.

Our Environmental Priorities

To conduct our business responsibly, we have prioritised the following long-term environmental principles, in line with various international organisations including the Sustainable Development Goals of the United Nations:

- **Goal 7 –** through the delivery of affordable and clean energy and the development of green energy systems including energy storage.
- **Goal 9 –** innovation to enhance the efficiency of infrastructures by developing new solutions and relying on partnerships with organisations such as RayGen and through providing energy flexibility solutions.
- **Goal 11 –** helping to make communities sustainable by developing and operating environmentally friendly, behind the grid energy solutions.
- **Goal 15 –** enhancing biodiversity and contributing to a healthy ecosystem by conducting environmental impact studies prior to the installation of power plants and working proactively on projects that are beneficial to local ecosystems and wildlife.
- **Goal 6 –** the sustainable use of water through the delivery of water treatment solutions, the conservation of water, and a range of remediation services to eliminate contaminants from groundwater and the environment.

2.1 Environmental Commitments

Beyond our work developing solar energy and clean water solutions, we have various policies in place to ensure that our dedication to environmental causes is also reflected in our internal practices.

- All of our field operations are subject to local environmental regulations, which we strictly adhere to.
- When disposing of waste, all recyclable materials such as metal, wood, plastic, glass, and paper are sorted and recycled.
- We generally do not use chemical fertilisers or pesticides for landscape management.
- For the cleaning of PV panels, we use only demineralised water, no chemical agents.
- When clearing land to construct new power plants, we conduct in-depth biodiversity studies and implement measures to ensure that any unavoidable impact is minimised or reversed.

162.8 GWh

electricity generated in 2024

66,682 t

of CO_2e emissions avoided in 2024

2.2 Carbon Footprint

Making a positive contribution to carbon reduction to mitigate climate change is our top priority.

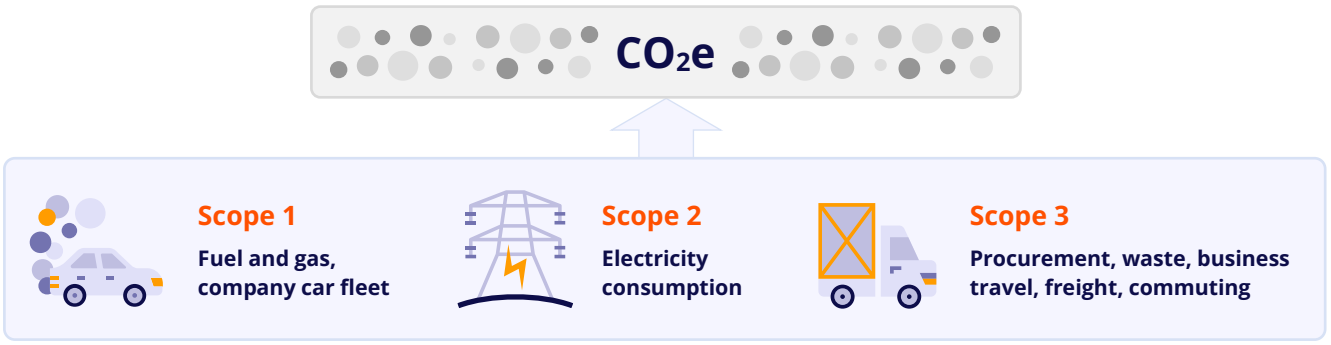
The aim of our core business is to reduce carbon released during electricity generation. In 2024, our solar power plants generated **162.8 GWh of clean electricity** and **66,682 tonnes of CO_2e emissions were avoided** as compared to conventional electricity production. This figure represents carbon emissions avoided annually by replacing the equivalent quantity of electricity generated from conventional electricity generation with clean generation from PV power plants. This equivalent quantity is based on the total production of our proprietary portfolio of power plants. The calculation is updated annually and utilises a carbon emissions factor. The emission factor considers the combined margin grid emission factor for countries in which Photon Energy Group operates and owns PV power plants.

Scope 1 emissions correspond directly to emissions from sources owned or controlled by the Group. In 2024, the assessment focussed on our car fleet, comprised of 119 vehicles.

Scope 2 emissions are detailed as indirect emissions produced by electricity consumption.

Scope 3 emissions cover purchased goods and services, capital goods, fuel, and energy-related emissions which are not included in Scope 1 or 2 emissions, transport and distribution, waste, business travel, and commuting of our employees.

As part of our ESG efforts, it is important to record and reduce the carbon emissions of our own activities. To date, we have initiated the implementation of an integrated approach to calculate and monitor our carbon footprint.



Scope 1 and 2 Emissions

In 2024, total scope 1 and 2 emissions amounted to 665.8 tonnes of CO_2e, reflecting a 0.8% decrease from the 670.8 tonnes of CO_2e emissions in 2023. Photon Energy Group improving monitoring practices for scope 1 and 2 emissions within our operational control to further reduce emissions. For instance, company cars are tested regularly to eliminate excess emissions due to mechanical dysfunctions. At the time of this report's publication, this fleet includes 5 hybrid vehicles, and two fully electric vehicles. By choosing electric vehicles over traditional combustion engine vehicles, we are reducing our carbon footprint and support a sustainable future. In total, 44,924 kilometres of distance travelled by our electric vehicles in 2024, our adoption of electric vehicles has led to an avoided fuel consumption of approximately 34.9 MWh energy in total and reduction of 4,798 Kg of CO_2e emissions, compared to traditional combustion engine vehicles.

Metrics	Unit	2024	2023	2022	2021	2020
Energy consumption (electricity and fuel)	MWh	2,172.5	1,593.0	1,525.0	1,684.9	269.8
Electricity use	MWh	824.1	609.4	576.4	477.1	176.6
Renewable energy consumption	MWh	24.1	-	-	-	-
Electricity production	GWh	162.8	139.8	121.6	103.3	70
CO_2e Emissions Scope 1 and 2	tCO2e	665.8	670.8	562.8	475.1	416.7
Direct GHG emission (scope 1)	tCO2e	317.3	247.0	240.0	305.0	286.6
Energy indirect GHG emissions (Scope 2) Location-based – Offices	tCO2e	112.2	193.4	169.6	39.8	73.8
Number of Employees	-	335	348	220	144	136
CO_2e Emissions Scope 1 and 2 per Employee*	tCO2e	2.0	1.9	2.6	3.3	3.1
Emission intensity	gCO2e/kWh	197.7	276.5	268.6	204.6	1,335.6

**The data have been corrected based on the updated methodology and revised data.*

Energy Consumption

In the 2024 reporting year, Photon Energy Group conducted a comprehensive data collection effort to assess the energy consumption across our offices, on-site operations, and fuel consumption of our car fleet. The fuel consumption of 119 Photon Energy Group vehicles in 5 countries was closely monitored, amounting 1,093 MWh for the reporting year. The breakdown by country is as follows: Czech Republic vehicles accounted for 33% of the total consumption, while vehicles in Romania, Hungary, Poland, and Slovakia account for 28%, 20%, 15%, and 4% of the total consumption, respectively. The majority of this energy consumption is attributable to our O&M activities.

The total electricity consumption at Photon Energy Group offices in Europe and Australia amounted to 173 MWh in 2024. On-site electricity consumption was estimated at 651 MWh. In terms of electricity consumption in our offices, the Czech Republic accounted for the highest share, 48% of the total consumption, followed by our offices in Romania, which accounted for 23% of total consumption. The Company's gas consumption amounted to 132.9 MWh in 2024, essentially used for heating purposes in offices located in the Czech Republic, Poland, and Romania. Our offices in Poland accounted for 51% of the total consumed gas. The electricity consumed at our offices and power plants is sourced from national grids.

Metrics	2024	2023	2022	2021	2020
Fuel Consumption (MWh)	1,348.4	983.7	948.6	1,207.8	1,025.2
Electricity Consumption – On Site (MWh)	651.1	495.7	469.3	402.9	102.8
Electricity Consumption – PEG Offices (MWh)	172.5	113.7	107.1	74.2	73.8
Number of Employees	335	348	220	144	136
Electricity Consumption per Employee (MWh)	0.41	0.57	0.38	0.30	0.77

Breakdown of fuel and electricity consumption in countries of operation is as follows:

Office Electricity Consumption Breakdown by Country (MWh)					
	2024	2023	2022	2021	2020
Czech Republic	83.3	55.2	45.2	56.8	54.7
Poland	18.0	47.0	47.8	1.6	1.5
Hungary	7.6	4.2	3.4	3.8	3.0
Romania	39.4	7.3	0.4	0.45	0.43
Australia	24.1	-	10.7	7.0	9.1

Fuel Consumption Breakdown by Country (MWh)					
	2024	2023	2022	2021	2020
Czech Republic	449.2	503.5	517.1	778.0	715.4
Poland	192.0	184.1	73.9	90.2	5.3
Hungary	271.0	164.6	259.8	243.8	215.1
Romania	380.6	100.9	55.1	52.0	40.5
Slovakia	55.6	30.6	42.7	43.7	48.8

Selected Scope 3 Areas

Photon Energy Group tracks and accounts for various sources of emissions, including business travels, commuting, and procurement-related activities. Our commitment to transparency and environmental responsibility drives us to provide information and data on our carbon footprint.

In 2024, our business travel encompassed flights, train and bus tickets, rental cars, and costs associated with the use of private vehicles for business purposes. The total distance covered amounted to 813,865.4 km, resulting in 160.5 tonnes of CO_2e emissions.

Estimation from the 2024 commuting survey, we estimated that Photon Energy Gorup employees travel an average distance of 17.4 kilometres per day, utilising various modes of transport including cars, foot, bike, or public transport. For the reporting year 2024, the total emission from employee commuting were estimated at 628 tonnes of CO_2e.

Procurement related emissions constitute a significant portion of our upstream value chain emissions. Specifically, freight emission attributed to the transportation of equipment purchased by our technology team for the construction of proprietary PV power plants or for our technology distribution activities.

Looking ahead, we are revising our scope 3 emission calculation methodology to provide more accurate and comprehensive reporting. These efforts represent a significant step forward in our carbon reduction targets and our commitment to sustainable practices. Moving into subsequent phases of our carbon emissions reporting program, data will encapsulate complete scope 3 emission or indirect emissions. This reporting will include emissions associated the value chain, including both upstream and downstream emissions.

Waste Management

Photon Energy Group is committed to being a responsible business by considering our projects' long-term performance and end-of-life decommissioning. Most of our GHG footprint and resource use is related to the components making up our plants.

Most waste is generated upstream during the extraction and processing of raw materials to create solar panels. This includes tailings and other waste from mining and processing key inputs such as iron ore for steel or quartz for glass and silicon. Solar module manufacturing involves a variety of chemicals, such as acids, that must be carefully disposed of, in addition to generating large volumes of wastewater.

We are normally dependent on local waste management infrastructure, and since we operate in different countries, recycling methods and rates may differ.

Key Waste Streams:

- **Procurement (Outside of Photon Energy Group's direct control):** Large volumes of wastewater, hazardous and non-hazardous waste.
- **Construction:** Large volumes of packaging (e.g., pallets and cardboard), general waste.
- **Operations:** Moderate volumes of damaged components, general waste.
- **End of Life:** Moderate volumes of modules and trackers, electronic waste.

On-site Waste Management

Our field operations adhere to local environmental regulations, emphasising the importance of responsible waste management practices. Recyclable materials such as metal, wood, plastic, glass, and paper are diligently sorted and recycled. Ecologically sound disposal methods are employed for PV components, ensuring environmental responsibility throughout our operations.

At Photon Energy Group, we recognise the critical importance of effective waste management in fostering environmental sustainability. To this end, we have implemented an Extended Producer Responsibility (EPR) system for on-site construction waste management. This proactive approach ensures the appropriate waste collection and reusing or recycling of waste generated during the construction of our PV power plants, minimising our environmental impact and promoting the circular economy.

Our dedication to sustainable waste management not only aligns with our values but also contributes to the preservation of natural resources, the protection of ecosystems, and the promotion of a healthier environment for current and future generations.

Office Waste Management

We have conducted a comprehensive review of waste management practices across the five offices housing more than 90% of our employees. This review involved preparing an inventory of the types of waste produced by each office, along with a detailed description of current waste management, reuse, recycling, and sorting practices. The identified categories of waste and recyclable materials include organic waste, soft plastic, metal, hard plastic, glass, paper, electronic waste, and other non-recyclable materials. Through this process, areas for improvement were identified, and we are in the process of establishing revised waste prevention rules to address them.

In collaboration with our third-party supplier, we have implemented a convenient solution for the disposal of used toners and cartridges at each printer in our Prague office. Specifically, we have placed boxes for collecting used toners and cartridges, which can also accommodate cartridges from personal home printers. The contents of these boxes are ecologically disposed of or recycled for reuse, aligning with our commitment to environmental sustainability and responsible waste management practices.

At Photon Energy Group, we are committed to sustainability and environmental stewardship. Through our collaboration with EKO-KOM, a leading packaging waste management company, we actively participate in a comprehensive system for sorting and recycling packaging waste in the Czech Republic. By partnering with EKO-KOM, we ensure that our waste is collected and utilized in accordance with legal requirements, contributing to the circular economy and reducing environmental impact. Together, we play a vital role in establishing an efficient waste management system, facilitating the recycling or energy recovery of over 80% of single-use packaging annually. Our dedication to responsible waste management aligns with our core values, and we continue to prioritise sustainable practices in all aspects of our operations.

2.3 Water Conservation and Management

Water is a scarce resource in many areas and therefore an important aspect of our environmental management. We optimise the usage of water during operations. The conservation and the quality of water is foundational to life on Earth.

Photon Energy Group's main use of water is for module cleaning during the operations phase of our solar projects; and the water consumption at the office settings are minimal.

Water plays a crucial role in cleaning solar modules to prevent yield reductions and potential damage caused by soiling. The amount of water needed depends on several factors such as ground conditions, vegetation cover, module soiling, and natural cleaning due to precipitation. Water used in module cleaning will contain dust that was on the panels and will fall to the ground or evaporate without an environmental impact. On average, approximately 740 liters of water per MWp was used for this purpose in 2024 showing slight increase compared to 738 liters per MWp in 2023. Notably, no cleaning agents been utilised in the cleaning process.

Wastewater generated in office facilities is directed to local centralised wastewater systems, complying with relevant regulations for treatment and disposal.

Photon Water and Photon Remediation's Sustainable Solutions

On a global scale, emerging hazardous contamination threatens the quality of valuable water supplies, making it imperative to adopt sustainable water management practices. Urgent action is required to meet current water needs without compromising the well-being of future generations. Photon Remediation addresses this demand by offering reliable remediation solutions with a long-term vision.

Photon Water specialises in managing water resources for clients, providing treatment for drinking water and wastewater. As a subsidiary of Photon Energy Group, Photon Water leverages both innovative and traditional water treatment solutions, integrating them with renewable energy.

Our approach is characterised by a considered, scientific, and holistic perspective, taking into account the complete project cycle and downstream consequences. From lake management to remediation, our solutions are designed to minimise environmental impact and waste. For example, our ultrasonic algae control target toxic algae without negative impact on environment, without use of chemicals and harmful by-products, maintaining natural ecosystem equilibrium.

Transitioning from conventional pump and treat filtration to mobile off-grid systems to in-situ methods promote sustainability, while electrochemically enhanced remediation techniques offer energy-neutral control and elimination of contamination.

Through our comprehensive solutions and services, we ensure access to clean water for all. This includes large- and small-scale water treatment units, recycling of industrial wastewater, and treatment of liquid waste.

Through the process of remediation, we remove harmful pollutants, ensuring soil health and safe water usage. We tailor remediation methods to the site and pollutants involved, guiding customers through every stage for the safest, most effective solutions.

In 2024, Photon Water revitalized the Botič Stream in Prague's Nusle District, stabilizing the embankment and improving water retention to create a healthier environment for wildlife and visitors. This project reflects our commitment to sustainable water management and environmental conservation, contributing to the well-being of local ecosystems and communities.

We initiated a pilot project in Jesenný, in December 2024, located in the Semily region of the Czech Republic, to tackle groundwater pollution caused by chlorinated hydrocarbons. Utilising advanced nano-remediation technology, the project involves the application of nano-iron combined with a direct current electric field to enhance the efficiency of pollutant removal. This innovative approach focuses on reductive dechlorination as part of a broader feasibility study of remedial measures at the Jesenný - Bohuňovsko site. Funded by the European Union through the Operational Programme Environment 2021–2027, this project is a significant step in Photon Water's efforts to address historical environmental pollution and improve groundwater quality.

PFAS and Pioneering Remediation

Per- and polyfluoroalkyl substances (PFAS) pose a significant environmental and human health challenge due to their persistent and bioaccumulative nature. Photon Remediation is pioneering in-situ groundwater remediation targeting PFAS contamination through collaboration with researchers from the Technical University of Liberec (TUL). By developing and applying electrochemically enhanced nanoremediation technology, Photon Remediation prioritises sustainability, community well-being, and safety.

In collaboration with laboratories at the Institute for Nanomaterial Advance Technologies, and Innovation at TUL, Photon Water (our remediation services have since been rebranded) established the world's first in-situ electrochemically enhanced nanoremediation trial site in Australia in November 2020 for PFAS contamination. Initial results from this small contamination hotspot align with laboratory findings, with the Australian Department of Defence advocating for the technology. The site has demonstrated a reduction in PFAS concentration of up to 80% -100% from the initial levels. While the study focused on proving the efficiency and safety of the technology, ongoing research at TUL and the Enhanced in Situ Bioremediation for Contaminated Land Remediation (EiCLaR) consortium, including the VEGAS Research Facility for Subsurface Remediation at the University of Stuttgart, continues to augment finding.

Current experiments utilising in-situ technology for polychlorinated ethylene (PCE) and planned experiments for PFAS contamination validate the versality of Photon Remediation's solution across various hazardous contamination types. With the increasing urgency of remediation action, more projects are being deployed across Europe and Australia to address PFAS and other chlorinated and fluorinated hydrocarbon contamination using this innovative in-situ remediation approach.

Photon Water Leads with Innovative Technology

Awareness of wetland importance is growing globally, and Photon Water is actively involved in wetland preservation efforts. In collaboration with an international consortium, we are developing Wetland+ technology at Jaworzno, Poland, as part of the EU-funded LIFEPOPWAT project. This innovative technology based on constructed wetlands for treatment of pesticide contaminated waters, aims to reduce levels of HCH, a persistent organic pollutant, in stream water. A form of HCH, was widely used in the EU as a pesticide and a treatment for lice and scabies until its production and application were banned in 2004. Nevertheless, this persistent organic pollutant still poses serious health risks for the residents of affected areas.

The consortium includes partners such as the Central Mining Institute and city of Jaworzno (pl. Główny Instytut Górnictwa), Photon Water, along with Technical University of Liberec (Czech Republic), Aarhus University (Denmark), as well as SERPOL France and Czech state-owned company DIAMO. The project focuses on demonstrating the effectiveness of wetland systems and establishing replicable process.

In addition to LIFEPOPWAT, Photon Water is involved in another EU-funded project to map and address HCH contamination in the EU. Photon Water sub-contracted by Tauw BV, a leading company to help with the inventorisation of HCH-contaminated sites in the Czech Republic and to assist one of the site owners with HCH-contaminated site management. This includes inventory contaminated sites in the Czech Republic and assisting with site management.

Excessive water consumption in zoological gardens poses significant environmental challenges, including high drinking water use, wastewater treatment needs, and impacts on surrounding surface water. The LIFE4ZOO project addresses these issues by demonstrating an integrated approach to water management that supports local water reuse, decreases wastewater treatment demand, and buffers water in engineered wetlands. Photon Water plays a pivotal role in this project as a technological partner, designing and optimising water management models for zoos, implementing FIT4USE water recirculation technology, and collaborating with international institutions. Our team's expertise is crucial in driving sustainable solutions and fostering a healthier environment.

2.4 Biodiversity

The development and construction of utility-scale renewable energy plants may include environmental impacts such as the degradation of habitats, reduction of resource availability, and transformation of habitats, which can affect biodiversity. Photon Energy Group works to implement mitigation measures to minimise impacts and restore biodiversity.

Photon Energy Group acknowledges that there is an ongoing global biodiversity crisis and that all businesses must work to minimise their negative impacts and maximise positive impacts. Utility-scale renewable power plants are essential to address the climate crisis but do require large amounts of land to capture energy from the sun, which impacts local nature.

Key potential biodiversity impacts from solar power plant construction involve land use changes over significant areas that can involve habitat conservation and potentially degradation. Photon Energy Group works to identify relevant impacts and implement mitigation measures to minimise impacts and restore biodiversity. We follow the precautionary principle and carry out studies such as environmental impact assessments, which may include assessing direct, indirect, to identify risks and mitigation measures before development.

We follow the mitigation hierarchy of negative impacts: avoid, minimise, restore, and finally offset to compensate for potential biodiversity losses.

All our project development and construction have been carried out with care to lessen the impact on fauna and flora. Relevant measures during construction and operations include, among other things, fencing of storage areas, keeping lighting at a minimum, and allowing the free movement (migration) of small animals by maintaining migration corridors underneath perimeter fences.

We have a framework for identifying and managing all environmental aspects relevant to our business under the environmental permits, which combines policies and procedures. This system guides us in managing biodiversity risks through initial project impact assessments and planning construction in seasons that do not impact the ecosystem and fauna. We focus our efforts not only on mitigating potential negative impacts but also on the restoration and creation of rich ecosystems.

Partnership with Czech University of Life Sciences Prague

In 2024, Photon Energy Group continued its collaboration with the Czech University of Life Sciences Prague, to enhance biodiversity at our photovoltaic power plants. This initiative, supported by the Technological Agency of the Czech Republic under the EU's Environment for Life Programme, aims to optimize biodiversity support in solar parks located in open countryside.

The project explores how solar parks can act as biodiversity hotspots in monocultural landscapes. Researchers from the Czech University of Life Sciences are studying vegetation and species at solar parks to develop standards for integrating biodiversity-enhancing measures.

Throughout spring and summer 2024, extensive biodiversity monitoring was conducted at selected solar parks owned or managed by Photon Energy. Researchers collected samples of flora and fauna to assess current biodiversity levels and carried out detailed vegetation mapping to identify areas with the highest ecological potential.

At the FVE Komorovice power plant, the first biodiversity-enhancing measures were implemented in autumn 2024. In collaboration with botanists, we planted 40 seedlings of 13 native shrub species and established a flower meadow using a regionally native plant seed mix. Grass clearing was performed, and the extracted material was repurposed to construct nesting walls for solitary bees. Additionally, a stone wall will be added to provide suitable habitats for reptiles.

The monitoring of insects during the first year of the project was successfully completed. At ten photovoltaic plants, arthropods were sampled using vegetation sweepings and pitfall traps. Detailed monitoring of butterflies and hoverflies was also carried out. Sample identification and data analysis are ongoing, with initial results presented at the 53rd Annual Conference of the German Ecological Society in Freising.

By the end of winter, modular insect houses will be installed onsite to further expand the diversity of microhabitats. We look forward to continuing our collaboration with Czech University of Life Sciences and advancing our biodiversity support and enhancement activities in 2025.

Broader Impact

Our collaboration with the Czech University of Life Sciences Prague offers numerous benefits that extend beyond environmental conservation. These initiatives play a crucial role in nurturing sustainable ecosystems and fostering the well-being of both wildlife and human communities.

By thoughtfully selecting plant species and nurturing diverse ecosystems around our power plants, we contribute to the preservation and restoration of natural habitats. This proactive approach not only strengthens the survival of native species but also helps counteract the adverse effects of habitat fragmentation and loss. Promoting biodiversity fortifies the resilience of ecosystem services, thereby safeguarding our planet's capacity to sustain life. Integrating biodiversity into our operations underscores our dedication to combating climate change.

Expected Outcomes

- **Ecological evaluation:** detailed assessment of the current ecological state of solar parks, including species identification and comparisons with the surrounding landscape.
- **Practical recommendations:** development of standards and recommendations to support ecological enhancement while ensuring efficient solar park operations.
- **Pilot projects:** implementation of biodiversity-enhancing practices on selected solar parks as pilot projects, serving as models for broader adoption.
- **Economic assessment:** evaluation of the financial benefits of biodiversity-focused management practices, demonstrating the economic value of "green solar parks."

We are proud to be part of this innovative research initiative, which not only contributes to nature conservation but also aligns with our commitment to sustainable and efficient solar park operations. We look forward to sharing more key findings as the project progresses.




Photon Energy

CASE STUDY

Driving Sustainability in Automotive Manufacturing

Nagykáta, Hungary	Clarion	3,620 t
Location	Client	Expected CO_2e Savings Over 20 Years

- Photon Energy delivered a ground-mounted 658 kWp solar PV power plant, providing green energy to Clarion Hungary's production facility under a 20-year Power Purchase Agreement (PPA).
- Expected to generate 14.1 GWh of renewable energy and avoid 3,620 tonnes of CO_2e emissions over 20 years, the plant will cover 20% of the site's annual electricity consumption.
- A full turnkey solution was provided, encompassing design, component selection, procurement, construction and ongoing operation of the PV power plant.

Photon Energy

CASE STUDY

Remote Solar Power for Critical Communications Infrastructure

Mount Owen Tasmania, Australia	BAI Communications	1,000 m
Location	Client	Above Sea Level

- BAI Communications, a global leader in communications infrastructure, required a reliable off-grid power source for a mobile communication antenna on Mount Owen, over 1000 meters above sea level.
- Photon Energy partnered with Clenergy, a global provider of innovative mounting solutions, to develop and deploy a standalone power system (SAPS) tailored to the harsh environment.
- The system has already proven its resilience, withstanding storm conditions with wind speeds of 141 km/h.

Photon Energy

CASE STUDY

High-capacity PV to Power Transport and Logistics Operations

Prague, Czech Republic	METRANS	714.87 kWp
Location	Client	Total Capacity

- METRANS, a leading container terminal operator, relies heavily on electricity to power its operations, particularly the loading and unloading of containers via HUB terminals.
- Photon Energy installed rooftop PV systems on three rooftops at METRANS' intermodal terminal. A full turnkey solution was provided, encompassing design, component selection, procurement, construction and ongoing operation of the PV power plants.
- The installations' combined capacity of over 700 kWp is expected to offset a significant portion of the terminal's energy consumption.

Photon Remediation

CASE STUDY

Safe Removal of Hazardous Liquid Waste and Equipment

Sydney, Australia	Indorama	8,000 L
Location	Client	Hazardous Liquid Waste Volume Removed

- Following the decommissioning of this Indorama chemical plant at Botany Industrial Park, the safe disposal of hazardous liquid waste and equipment was required.
- Photon Remediation delivered a phased solution, followed by the complete demobilisation of all contaminated equipment, to be transported to licensed facilities for destruction.
- Careful planning and coordination ensured that the project was handled safely and all regulatory requirements were met.

2.5 Quality Control

The highest standards of quality in our products and services are vital not only to our business, but to managing the environmental impact of our work. In addition to our own standards and practices, we strictly adhere to all relevant laws and regulations concerning product quality and safety.

Practices during the development and construction of power plants:

- Our assets and operations are subject to various environmental laws and regulations in the jurisdictions in which we operate. These environmental requirements include ecologically responsible disposal of PV components. Waste record keeping and the transfer of waste to specialist companies with practising management permits in accordance with local environmental law also features in our quality control procedures.
- Regular checks are made with subcontractors, including a Work Completion Test (WCC), Preliminary acceptance Test (PAC) and a Final Acceptance Test (FAC). The WCC consists visual inspection of all components, while the PAC and FAC mainly focuses on the functionality of major components, such as the emergency off switch, switchboards, bus bar, circuit breakers and modules. The PAC test is done after commissioning and FAC test is done for PVPs in operation for defined period.

Practices during the operation and maintenance of power plants:

- Preventative maintenance as the central component of our approach. This includes targeted inspections and testing to ensure that any potential problems are identified and resolved before they become a fault, minimising downtime.
- Regular technical audits, aligned with a continuous improvement culture, which consist of in-depth inspections and data analysis in order to assess performance, identify problems and implement solutions.
- Online monitoring and analysis services for all types of PV projects, ensuring that system abnormalities are identified and rectified, and that sites run at optimal performance.

Our approach to quality control allows for optimal performance of components by minimising operational and energy losses, and to ensure compliance with local government and environmental regulations, thanks to our forecasting tools.

2.6 Environmental Impact

We strive to avoid or minimise any detrimental changes to local landscapes. The potential negative environmental impact of our projects is identified during the development stage, and corresponding investigations are carried out for small-scale projects. For larger projects, environmental impact assessments (EIS) are carried out. For the company's major projects in Australia, EIS's are conducted at the outset. During the first year of development, a large amount of information on the environmental impact of each project is documented and then published as part of the approval process. Our projects are very often large-scale and long-term (the life cycle of a PV installation is generally at least 25 to 30 years), and as such we take great care assessing, managing, and monitoring any possible impacts on local communities.

The development and construction of PV power plants and water treatment installations can make significant impacts on local ecosystems, and as such are subject to stringent environmental regulations as well as regulatory requirements in the form of building permits. In Australia, development approvals for PV power plants are subject to public inquiry and consultation, which brings together representatives of central and local government as well as environmental and other associations. A dedicated website is set up at the commencement of an Australian project providing transparent project information to the public and a direct contact line during the project's development.

Photon Energy Group is committed to the minimisation of our impact on the environment, and to ensuring the health and safety of communities impacted by our work, by complying with relevant state and local environmental policies as well as industry-specific legislation. During the construction, operation, and maintenance of our PV power plants, we have not encountered any incidents or injuries impacting the communities neighbouring our sites.

Social Conduct

3. Social Conduct

We are proud to have built a dynamic, diverse team of colleagues, comprised of 26 nationalities in locations around the world. We recognise this vibrant community as one of our greatest strengths, and we are dedicated to its continued enrichment.

3.1 Social Commitments

- We have stringent health and safety policies and procedures in places, and all employees are responsible for complying with applicable laws and regulations.
- We embrace all forms of diversity and provide equal employment opportunities for all, regardless to gender, race, religion, disability, sexual orientation, or age.
- We provide an open, inclusive work environment, and discrimination of any kind is not tolerated.
- We ensure that all employees are treated equally and objectively in opportunity and remuneration, using merit-based criteria.
- We understand our obligation to protect the privacy of our customers and suppliers. We have policies and procedures in place to ensure that sensitive data is protected. This includes electronic data stored in our systems.
- We follow all local guidelines and regulations regarding community involvement and consultation.
- When working with subcontractors, we prioritise local suppliers to have a positive impact on the local economy through job creation.

26 nationalities
in our global team

3.2 Our Employees, Our Core Assets

Building a Better Future Together

Photon Energy Group is a value-driven organisation committed to fostering positive change. Through training facilitated by our organised teams, we continuously enhance our capabilities. We recognise diversity as a vital and inherent aspect of our organisation, understanding its importance in shaping our collective success.

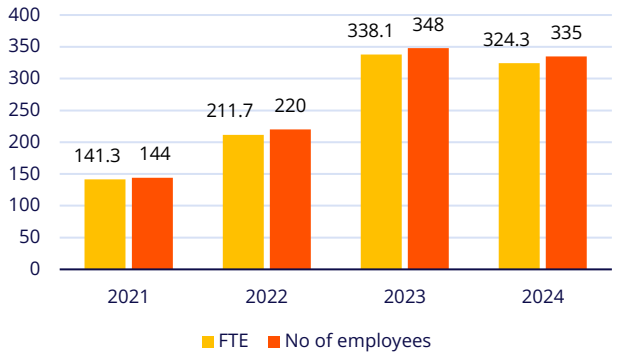
By combining robust functional, technical, and operational expertise with a keen understanding of local markets, we strive to deliver optimal solutions. We aim to seamlessly integrate the best of our global capabilities into local contexts, creating a harmonious and impactful approach. Our unique expertise in navigating complex environments drives our commitment to actively engage with all stakeholders, including local communities, as we strive to foster a better future.

In 2024, our international team comprised more than 335 permanent employees, the majority of whom were based in Europe and represented 26 different nationalities. Our continued efforts to enhance gender diversity achieved 37% female representation overall and 24% in management levels across our organisation in 2024.

Talent Attraction, Retention and Development

At the end of 2024, Photon Energy Group had 335 employees (compared to 348 employees at the end of 2023) translating into 324 FTE (compared to 338 FTE as of the end of 2023).

In addition to our employees, 45 contractors worked with the Photon Energy Group team in 2024. These are not reflected in the graph below.



Full-time equivalent (FTE) *is a unit that indicates the workload of a person in a way that makes workloads comparable across various contexts. An FTE of 1.0 means that the person is equivalent to a full-time employee, while an FTE of 0.5 signals that the employee is only half-time.*

One of the key factors resulting in the continuous growth of Photon Energy Group has been the development of a culture that prioritises shared values and seeks to encourage the ongoing well-being and development of its employees. Based on this, we have a two-tiered approach in our employment practices: attracting a strong, diverse pool of talent and encouraging professional development.

Our senior managers are hired from the local communities where we operate. We support and provide ongoing training and professional development, especially in areas related to health and safety – in particular training for accreditation for electrical work – workstation training for the adoption of new tools and the development of other competencies such as linguistic skills.

We have partnered with a language school who runs courses year-round and deployed at a larger scale English and Czech language lessons for Photon Energy Group employees. We instituted an anti-corruption training program and training courses related to our Code of Ethics and Insider Trading.

Photon Energy Group strives to appoint employees with professional skills and competencies that will enable the continued international growth and development of the company and its culture, and that encourages a long-term relationship between the company and the employee.

Permanent and temporary employee numbers for 2024 is provided in the tables below.

Metrics	Australia & New Zealand	Europe	Total
Permanent employment	32	294	326
Temporary employment	8	1	9
	Men	**Women**	**Total**
Permanent employment	203	123	326
Temporary employment	7	2	9

Diversity, Equity, Inclusion, and Belonging

Building a culture that nurtures diversity in all aspects is key to achieving our company goals and maintaining a flexible and agile working environment. Photon Energy Group embraces holistic Diversity, Equity, Inclusion, and Belonging (DEIB) in our practices, policies, procedures, development programs, and initiatives.

Diversity is a business imperative at Photon Energy Group as it enables better decision-making and increased value creation. A focus on diversity is forward-looking and development-oriented, reflecting the market and society's expectations, and assisting in solving societal challenges while contributing to higher workplace participation.

The company embraces diversity and inclusion within its policies, practices, and procedures, including the recruitment process, performance and rewards, and learning and development programs.

Employees are supported in the achievement of both personal and professional goals, and programs including talent development and individual development planning. We offer global career opportunities. In our roles, we are exposed to various disciplines, technologies, and projects within several geographical locations. This exposure gives employees the opportunity to learn and develop competencies at an accelerated pace.

A key element in developing our people is investing in an extensive learning portfolio. Our learning programs and initiatives span across many areas.

- **Onboarding:** we have implemented face-to-face and e-meetings to ensure new starters get a good overview of our business and processes and learn about our company culture from day one.
- **Competence development:** we have identified prioritised competence areas to develop and run targeted functional training to close gaps.
- **Online training:** online training provided to our employees, including Code of Ethics, driving safety training, fire safety and OHS (occupational health and safety) for employees, information and cyber security training, and tailored training for home office safety.

A performance review processes were initiated, and the first phase of a review is conducted before the end of the trial period for new hires, and for a growing number of departments, a performance review has been conducted annually. We introduced a new global online Performance and Development platform in 2023, to support employees and managers on their journey. We aim to enhance convenience and ensure a more efficient experience for everyone in setting goals and performance and development program.

Appropriate Remuneration

Remuneration rates are designed to attract, retain talent, and reward good performance. We offer our employees a competitive, performance-based remuneration system, including market-oriented pay, individual bonuses, a long-term incentive plan, and project-based special payments. As outlined in our Code of Conduct, we are dedicated to fostering an appreciative and unbiased working environment. The HR department is responsible for overseeing the implementation of these measures. For details on the remuneration policy please refer to our 2024 annual report.

Gender Pay Gap Ratio at Photon Energy Group

At Photon Energy Group, we prioritise transparency and equity in our workforce practices, including the calculation of our gender pay gap ratio (GPG). Our approach centres on the adjusted GPG, which considers factors beyond gender, such as job level and seniority, to provide a comprehensive understanding of internal remuneration disparities.

To ensure accuracy, our GPG methodology involves meticulous data selection, acknowledging regional variations, and making equivalency adjustments for part-time employees. By calculating average incomes for men and women within equivalent positions and countries, we derive country-specific gender pay gaps, ultimately averaging these to determine the Photon Energy Group adjusted GPG.

The methodology behind our adjusted GPG encompasses 39 comparable positions across five countries including 22 women and 17 men. The adjusted GPG ratio in 2024 amounted to 7.9%. Through ongoing analysis and action, we strive to address disparities and promote a culture of diversity and inclusion at all levels of our organisation.

Benefit and Other Retirement Plans

Due to the continuous development of the Company, we have implemented some new benefits locally to support employee healthcare (medical package, sport cards, meal contribution) and company social responsibility (CSR Day).

Employee Share Purchase Programme

Our management team recognises the significant contribution of its employees to the development of the Group. We operate an Employee Share Purchase Programme both as recognition of employee value and as a motivational tool. Under the terms of the programme, the Group periodically purchases shares for participating employees equal to 10% of their gross compensation net of respective taxes.

According to the Employee Share Purchase Program Policy, starting from 1 January 2023, participants of the Employee Share Purchase Programme have the right to dispose their shares during their employment contract, after three years of holding the shares.

Compatibility of Family and Work

Family-friendly regulations are essential for achieving optimal work-life balance. This entails offering flexible job arrangements, including remote work options and digitized workplaces. Our home office policy, coupled with trust-based, flexible working hours, allows employees to work remotely, accommodating their individual needs and preferences.

Regarding parental leave, we adhere to local regulations of the countries we operate in to ensure that employees are supported during significant life events.

3.3 Corporate Social Responsibility and Employment Practices

An important part of our mission is to empower everyone across the Company to help make Photon Energy Group the best possible organisation to work for. Key achievements from the past year:

- We further improved our intranet with new face to enable cross-border working groups, networking, and getting to know each other's expertise through personal and departmental profiles.
- Through regular business updates, such as our internal newsletter, town hall meetings and regular all-staff meetings and Q&A sessions with our CEO, we have worked hard to remain connected, open, and authentic.
- The safety and wellbeing of our team members have continued to be a key focus.

2024 Employee Engagement and ESG Survey

Photon Energy Group conducts a global engagement survey annually. The survey serves as an important tool for identifying potential discrimination risks. It includes specific questions about diversity and discrimination, enabling us to pinpoint areas where employees may have experienced any forms of discrimination and tailor initiatives accordingly.

The 2024 Employees Engagement and ESG Survey was conducted globally in September 2024 to gather information and insights from our diverse team of colleagues around the world. The survey ensured 100% confidentiality, with all data collected and analysed by an independent third party.

The results were shared with employees at an aggregated level, and several group discussions were organised to define action plans. The survey received responses from more than 217 employees, representing over 65% of our organisation at the time.

The survey data reveals encouraging trends and areas for improvement within our organization. Collectively 92% of employees agreed and strongly agreed that working in renewable industry has been motivating. A significant majority (59%) agreed that our health and safety training is adequate; we prioritise employees' safety, 54% strongly agreeing that they have not put into situations where their safety is compromised.

At Photon Energy Group, equal opportunities and respectful treatment are valued, with 56% strongly agreeing to equal opportunities without discrimination. Additionally, 53% agreeing that appropriate response would be taken to theft and bribery occurrences. Notably, 57% of employees agree that equal opportunities for women exist in pay, promotions, and leadership roles.

ESG is well-received, with over 59% of employees recognising the importance of ESG, and its potential to enhance competitiveness and how ESG and sustainability integrate into daily operations. 70% of the employees believe that the company's supply chain management and procurement practices align with its commitment to environmental stewardship. These insights provide a roadmap for maintaining strengths like safety programs and addressing areas needing enhancement, such as environmental responsibility and training clarity. Overall, the ESG and Employee Engagement Survey offers invaluable insights, guiding our efforts to foster a positive, inclusive workplace.

Donation Policy and CSR Days

At Photon Energy Group, we have a strong awareness of our social responsibilities and strive to make positive contributions to our social and ecological environments. Our Donation Policy details the framework governing any operation of donations, corporate social responsibility activities or sponsorship. The purpose of the Donation Policy is to express our commitment to engaging in corporate social responsibility activities that are in line with the Group's Sustainability Policy and Code of Ethics. Such activities aim to support the communities in which we operate, including those who may not directly benefit from our primary business activities. Philanthropic donations and non-commercial sponsorships do not provide Photon Energy Group with material return on investment.

This Policy applies to all Photon Energy Group entities. The managing directors are responsible for ensuring the effective implementation of this Policy. Adhering to this Policy will be the responsibility of the relevant business entity seeking to organise a Donation or a Sponsorship, and as required or requested, in consultation with the Sustainability department.

A CSR Day program was launched in 2023, as part of the Policy. Through this program employee can donate one working day to a charity of their choice, within the scope of the Donation Policy. Employees can use their CSR Day individually or together

with a group as a team-building event. Employees are entitled to one CSR Day pre calendar year compensated by company.

Volunteering provides an opportunity to give back to our communities. It allows employees to contribute and make a positive impact, allowing to connect with people and improve our environment. Volunteer work can also help employees learn new skills and can also be a great opportunity to strengthen the bonds within teams.

Volunteer activities should support a charity or non-profit organisation that is aligned with certain areas, prioritised by Photon Energy Group:

- Organisations whose work is related to the Group's business activities.
- Education and R&D with a strong focus on engineering and technology.
- Environmental initiatives.
- Youth and educational development, including social initiatives related to sport.

CSR Day – Supporting Community

Throughout the year, employees at Photon Energy Group embraced the spirit of corporate social responsibility through various volunteer initiatives. From volunteering in flood affected area in Krnov, Czech Republic to walk with senior citizens in Prague, to collecting waste in Bucharest, our teams demonstrated their commitment to making a positive impact in their communities. These endeavours reflect our dedication to environmental sustainability, and individual well-being.






3.4 Community Impact

Local Value Creation

We develop, construct, own, and operate renewable energy projects in emerging markets. By having an active presence, a unique opportunity exists to positively impact our local neighbours within each phase of a project.

Contributing to long-term local value creation is a key success criterion towards achieving the overall company goal of delivering competitive and sustainable renewable energy. We always strive to create long-term value, but we also acknowledge that there is a risk of unintended consequences from developing, constructing, and operating renewable power projects. Priority activities include community engagement, local recruitment, grievance handling.

Contributing to long-term value creation is a key success criterion for achieving our overall company goal of delivering competitive and sustainable renewable energy. Photon Energy Group aims to positively impact on the communities we operate in, both directly and indirectly. To maintain good relations, regular meetings are held with local leaders and representatives in the communities surrounding our sites.

Photon Energy Group recognises the profound impact that our operations can have on local communities worldwide. As a responsible global citizen, we prioritise fostering positive relationships with the communities in which we operate. This section explores our commitment to community engagement, the tangible benefits our projects bring to local areas, and our efforts to empower and support community development initiatives. From ensuring compliance with local regulations to actively contributing to economic growth and social well-being, we are dedicated to making a meaningful and sustainable difference in the lives of those we serve.

In addition to these regulatory requirements, and for every projected location worldwide, we engage in preliminary discussion with local authorities as a means of ensuring each project's compatibility with territorial and community policies. We have local teams in place in every country we operate, allowing us to communicate with and provide information directly to local authorities in order to ensure the clear, accurate presentation of a project and its challenges.

We believe local requirements are appropriately stringent in the countries where we operate, and we are not currently developing projects in any countries with a high corruption perception index. However, if we choose to develop projects in other countries in the future, notably emerging countries, we may go beyond what is required by local environmental regulations if deemed inadequate. In such cases, we will make use of the guidelines published by the International Finance Corporation (IFC).

Our activities contribute to the supply of sustainable energy and water solutions and provide local communities the benefit of positive economic impacts from our projects and installations via taxes, the leasing of land and job creation. When possible, we always prefer to work with local subcontractors, as a contribution to the local economy. This is applicable in all our markets. We also strive to empower community groups and support intern programs to assist with our construction, technical and operational projects.

Our approach to taxation is applied across all our locations and reflects our ethical guidelines. As an international organisation, Photon Energy Group pays taxes, duties and other contributions which may be significant in the countries in which we operate. We apply tax rules rigorously and are compliant with all local requirements, international treaties and the guidance provided by international organisations. We only create foreign entities for the purpose of developing our activities or responding to operating requirements.

It is crucial for us that our facilities are integrated into nature in the best possible way, and that we engage in dialogue with members of the community.

Working with Local Suppliers

We work to strengthen our local supplier base by identifying short, medium, and long-term services that could be supplied by local suppliers in the local communities surrounding our solar plants. This can be achieved through targeted supplier development initiatives that promote local capability and capacity building.

The operation and maintenance of our proprietary PV power plants are done in-house by local employees and technicians working in each operating country.

3.5 Workplace Health, Safety and Security

Along with sustainability and community, safety is one of our core values. We place the highest value on the safety and well-being of employees, as well as that of the communities and environments in which we operate. Our health and safety performance and objectives are monitored and evaluated internally as well as annual management review. Our goal is for every employee and contractor to return home safely at the end of every day.

We take responsibility, set requirements, and monitor health and safety performance in the development, construction, and operations phases of our projects. We define and communicate our standards to our employees and subcontractors.

Health, Safety and Environment

Health, Safety, and Environment (HSE) are key priorities for Photon Energy Group. We take responsibility, set requirements, and monitor HSE performance in the development, construction, and operations phases of our projects. We define and communicate our standards to our employees and subcontractors.

At the core of Photon Energy Group's vision for health, safety, and environment (HSE) is working together to achieve zero harm. We aspire to achieve zero harm from the impact of our business on the health and wellbeing of all our employees and stakeholders, the environment, and society at large.

We continuously work towards zero harm to personnel, assets, and the environment. All our business activities are conducted

in accordance with applicable labour standards and fundamental human rights norms as prescribed by the International Labour Organization (ILO).

Photon Energy Group is committed to maintaining a comprehensive, effective, and consistent HSE management system across all projects. Our HSE performance and objectives are monitored and evaluated in internal and external audits and annual management reviews.

Leading in Quality Management and Ongoing Improvement

We utilise leading indicators for monitoring activities across various business units, including tracking incidents and improvement ideas, closing audits, and conducting management inspections. Aligned with our strategies:

- All of our Australian operating entities are certified to ISO 9001, ISO 14001 and ISO 45001 standards.
- All of our European Engineering Solutions, and Operations and Maintenance entities are certified to ISO 9001, ISO 14001 and ISO 45001 standards.
- We conduct annual internal audits followed by ISO supervisory audits and ISO recertification every three years to ensure alignment with industry best practices.

ISO 9001: Quality Management	ISO 14001: Environmental Management	ISO 45001: Occupational Health & Safety Management
Czech Republic, Hungary, Poland, Romania	Czech Republic, Hungary, Poland, Romania	Czech Republic, Hungary, Poland, Romania
Australia	Australia	Australia

Our Strategic Direction and Objectives

Our location-based work, such as the construction, operation and maintenance of PV power plants prioritise addressing health and safety risks associated with machinery and electrical environment.

Every employee is responsible for complying with applicable health and safety laws and following our internal policies and practices. If an unsafe situation is observed, the situation will be rectified, and we make it clear to employees that safety is our highest priority to ensure that they feel comfortable stopping unsafe work practices or assisting others in the development of safer practices.

When working with subcontractors, health and safety aspects are considered pre-contract, and contractors are also required to respect all local regulatory requirements. During the construction of PV power plants, the project manager is responsible for ensuring compliance with health and safety requirements by the teams under the responsibility of each contractor. Risks are identified, mitigated, controlled, and monitored. Necessary actions are taken to prevent recurrence. If discrepancies are noted between the required measures and their implementation, applicable controls may be reinforced and all activity at the site could potentially be suspended. Prior to the hiring of a new team member, our subcontractors must organise training related to the working environment and safety rules, also make them aware of any potentially hazardous situations employees might encounter.

This type of monitoring ensures that working conditions are as safe as possible for employees. These parameters also have a direct impact on the quality of service we provide, in 2024 there were no serious workplace accidents.

The identification and reporting of work-related hazards and hazardous situations are strongly encouraged throughout the Company. Photon Energy Group focuses on leading KPIs to ensure a proactive approach to our HSE improvement work.

We work continuously for zero harm to personnel, assets, and the environment, and we believe that all incidents and accidents can be prevented through awareness, training, and preparedness. Mandatory OHS training for all employees includes OHS introductions for all new employees, and travel safety and security as part of the driver training.

Photon Energy Group provides access to relevant information on occupational health and safety to workers through various channels (such as SharePoint news), training to various groups of employees (for example, tailored training for project site staff), and mandatory courses for all employees.

We will continuously work to monitor that all our subcontractors operate in accordance with our policy and principles. Our Third-Party Code of Principles and Photon Energy Group's Code of Conduct are integrated into all our business conducts to ensure that these principles are respected, also in the parts of the value chain we do not control directly.

All of Photon Energy Group and our contractors' employees are covered by our Occupational Health and Safety System. That includes 100% of Photon Energy Group employees as of 31 December 2024.

- Our main goal for 2025 is to maintain the zero fatalities and serious injuries.
- Maintaining the quality management, health, and safety management system.

Work related injuries	Unit	2024	2023	2022	2021	2020
Fatalities	Number	0	0	0	0	0
Sick leave*	Number	1188	1111	820	-	-
Lost time injuries	Number	0	0	0	0	0
Accidents	Number	0	0	0	1	3

**Sick leave includes all sick leave, not only leave resulting from any sort of harm at the workplace.*

3.6 Promoting Human Rights, Our Commitment and Progress

Renewable energy projects may trigger environmental and social impacts. We endeavour to minimise our negative impacts, maximise local benefits and ensure constructive dialogue with all project stakeholders. In all our work, we pay special attention to the human rights.

At Photon Energy Group, we believe in upholding the dignity and rights of every individual across our operations and supply chain. We are dedicated to continuously improving our approach to human rights management, from implementing robust risk identification in our supply chain processes to collaborating with stakeholders on critical issues.

We have enhanced and fortified our supply chain due diligence process for third-party to integrate human rights considerations into our evaluation process effectively. Additionally, we are introducing new documentation procedures for Know Your Customer (KYC) and Know Your Supplier (KYS) to further ensure ethical and responsible business practices, and separate software solution have been introduced to automate the process and make it seamless.

Throughout 2024, Photon Energy Group collaborated with key stakeholders to address the alleged forced labour issues in the solar PV production industry. In line with our ongoing improvements strategy:

- Improve due diligence to best practice level.
- Enhance human rights risk identification and management processes in collaboration with all relevant units.
- Improve our Environmental and Social Supply Chain Management System, to identify environmental and social risks, warranting a detailed human rights due diligence assessment.

3.7 Data Privacy and Security

We have implemented strict policies and procedures to ensure that sensitive data and other information valuable to the company and our stakeholders is maintained and protected. This includes electronic data stored in our systems. All employees are responsible for complying with the relevant privacy and security policies, including the General Data Protection Regulation.

Whenever we receive requests to disclose or share potentially sensitive or confidential information, any disclosure must be both appropriate and legally necessary. We understand our obligation to protect the private data of our customers and suppliers. All employees take great care to never jeopardise the security of that information.

To further enhance our data security, we have implemented a comprehensive cyber security training program in 2024. This program includes mandatory training sessions for all staff, covering essential topics such as identifying phishing attempts, securing devices, and understanding data protection regulations. By fostering a culture of cyber awareness, we aim to mitigate risks and safeguard our operations against potential cyber threats.

Corporate Governance

4. Corporate Governance

Business Conduct

Photon Energy Group's focus on bringing clean energy to emerging markets in Europe means that many of the countries we operate in present significant challenges. We make extensive efforts in our projects and operations to prevent corruption and other unethical practices.

Exemplary corporate governance is essential to our sustainability, fostering trust and nurturing lasting relationship with all our stakeholders.

As Photon Energy Group continues to grow, we are committed to maintaining and strengthening our focus on the responsible management of our operations and affairs at a corporate level.

4.1 Corporate Governance Commitments

- We have an independent supervisory board and audit committee in place to provide guidance and oversight to the management board on the general affairs of the company.
- As a listed company, we apply the Dutch Corporate Governance Code 2022 and Warsaw Stock Exchange Best Practices 2021.
- We are committed to ensuring that all employees, customers, and suppliers act in an ethical manner and that stakeholders are not subject to unethical behaviours such as corruption, bribery or extortion.
- We have an anti-corruption policy and a whistleblowing system in place, and an insider trading policy is signed by all employees when they sign their contract of employment.

100% of our technology suppliers

subject to due diligence

4.2 Governance Rules and Codes of Conduct

Photon Energy N.V., the holding company for Photon Energy Group, is publicly traded on regulated markets, which leads to heightened scrutiny of its governance practices and increases the importance of governance structures, practices, and behaviours. The listing of our shares on the main markets of the Warsaw and Prague stock exchanges also resulted in the adoption of the Dutch Corporate Governance Code 2022 and the Warsaw Stock Exchange Best Practices 2021 as guidelines for our corporate governance.

Companies in the renewable energy sector have the potential to develop close relationships with government officials, suppliers, third-party contractors, and utility customers. These relationships can be exploited by employees for financial gain. The utilities sector has historically experienced incidents related to ethical misconduct, including procurement fraud and bribery. Best practices for utilities include strong anti-corruption policies, whistleblowing systems, and due diligence on third-party transactions.

A Supervisory Board and an Audit Committee were established on December 4, 2020. These changes to the Group's corporate structure were connected to listing on the regulated market of the Warsaw and Prague Stock Exchanges ensuring full compliance with public company laws and the best practices of regulated markets.

The Supervisory Board is responsible for supervising and advising the Management Board. It follows applicable law, the Articles of Association of the Company, Dutch and Polish Corporate Codes of Conduct, Rules of Procedure of the Supervisory Board, and the Company's interests. It operates independently of the Management Board.

Photon Energy Group's Audit Committee undertakes preparatory work for the Supervisory Board's decision-making regarding the supervision of the integrity and quality of the Company's financial reporting and the effectiveness of its internal risk management and control systems. It maintains contact with external auditors and monitors the Management Board in connection with the Company's funding, tax policy, and application of IT technology, especially cybersecurity.

Supervisory Board is comprised of three members: Boguslawa Skowronski, Marek Skreta, and Ariel Sergio Davidoff, appointed to a four-year term of office. The members possess extensive experience as entrepreneurs and executives at international institutions and have in-depth knowledge about Photon Energy Group and its end-markets. The full presentation of Supervisory Board can be found on our website in section Corporate Governance. The representation of minorities on the Supervisory Board is 33%.

Supervisory Board

The Supervisory Board (raad van toezicht) is a supervisory body responsible for overseeing the policies of the Board of Directors (referred to interchangeably as the Management Board) and the general affairs of the Company. A Supervisory Director is appointed for a maximum period of four years, with their term ending on the day of the Annual General Meeting held in the fourth year after their appointment. A Supervisory Director may be reappointed for another maximum period of four years, after which they may be reappointed once more for a maximum period of two years. This term may be extended once for an additional maximum period of two years.

The duty of the Supervisory Board is to supervise the policies of the Board of Directors and the general course of affairs of the Company and its affiliated business. The supervision of the Board of Directors includes the following areas:

- The achievement of the Company's objectives
- The corporate strategy and risks
- The financial reporting process
- Compliance with legislation and regulation
- Functioning and effectiveness of the internal risk management and control systems
- The Company/shareholder relationship
- Compliance with and maintaining of the Company's corporate governance structure
- Preparation of the annual account

Audit Committee

The Audit Committee has performed a thorough and continuous review of the internal risk management systems, internal audit function, controlling and legal compliance policies, throughout the year and during its on-site visits in May and November 2024. The assessment includes the evaluation of the existing processes in place, human resources, its competences, and responsibilities as well as the reporting structure within the organisation.

The chairman of the Audit Committee performed the analysis through the consultations with the responsible personnel (the management, CFO, COO, the head of risk, finance director, the head of accounting and consolidation, and the head of compliance). He reviewed the procedures and evaluated whether adequate resources are in place and discussed relevant topics with external auditors. He observed that the finance and controlling departments are stabilized and robust and sufficient human resources are allocated. While the bulk of the finance processes remain to be put into a more formal setting, the Audit Committee concluded that the current measures with respect to internal audit function are adequate and there is no indication of any fraud. They recommended that a stronger formalisation of the internal audit function (either through hiring of an appropriate candidate or sourced out externally with the consulting firms) is desirable, in line with the recommendation published in the 2023 annual report. The focus is on elimination of manual errors. The results of this analysis were discussed with the Board of Directors.

Further information on our corporate governance can be found in our 2024 Annual Report, as well as in the Corporate Governance section of our Investor Relations website.

Meetings

Reacting to the challenges in 2024 the Supervisory Board increased the frequency of its meetings and met 11 times, in person or online. Additionally, the Audit Committee met four times, in person or through videoconference. The Supervisory Board adopted one written resolution. In 2024, the Supervisory Board discussed a wide range of topics, including:

- Strategy and guidance for the year 2024 and sustainable long-term value creation were discussed at the beginning of the financial year and throughout the year. The Supervisory Board and the Management discussed the direction and focus of the Group on capacity market and aggregation, trading and origination, green bonus and other subsidies, and other strategies for sustainable long-term value creation, development of proprietary portfolio vs. acquisition of ready-to-built projects.
- Budget considerations, feed in tariffs vs. merchant-based portfolio, revenue mix of the Group.
- The regulatory landscape and the risks involved (changes in supporting schemes in Czech Republic, Romania and Hungary)
- Continued integration and management of the New Energy division (formerly Lerta), its business lines, and the departure of Lerta's two founding members.
- Financial results were discussed and analysed on a quarterly basis, including focus on cashflow, maintaining liquidity and results and margins of the individual Company operational segments.
- Developments and trends on energy markets in EU, Australia and worldwide, and specifically in jurisdictions where the Company is active, volatility of electricity prices, existing and upcoming legislative changes affecting the Company's business, component trading business and a new team.
- Divestment of developed projects in Poland, Divestment of projects in Australia (Leeton, Fivebough, Boggabri) and the direction of Australian business.
- Development and construction of the proprietary portfolio in Romania.
- RayGen's technology and development of Yadnarie, PFAS potential and other projects.
- Financing of the Group and loans; development of the Company's share and Green Bond price.
- Resignation of Mr. Gartner from the Board of Directors, his nomination into Supervisory Board and nomination of Mr. Forth into the Board of Directors.
- The Audit Committee together with the external auditor discussed the audit plan, increase of materiality threshold (in relation to the increase of EBITDA), key audit matters, Lerta's goodwill and valuation of Australian business and the outcome of audit in accordance with the good practise 1.7.4 of the Dutch Corporate Governance Code.
- The chairman of the Audit Committee made several on-site visits, met with the Board of Directors and individual employees/managers and reviewed Company's internal risk management, controlling, compliance and internal audit procedures.
- Supervisory Board also held an off-site meeting taking place in Germany. The sessions included online presentations by the division heads, discussions about the direction of the Group, cost-cutting measures to be taken, evaluation of various sources of cash flow.
- Necessary implementation of the legislative requirements under the EU CSRD Directive (EU taxonomy), sustainability reporting and NIS2 Directive were discussed.
- The Supervisory Board, through a written resolution approved the 2023 standalone and consolidated financial statements, loans extended to Managing Directors, and changes to Remuneration Policy.

4.3 Climate-related Risk Assessment and Management

Climate change represents both strategic and operational risks to our business. These can be grouped as physical risks and transitional risks. Physical risks include greater severity of flooding, droughts or other extreme weather events which could disrupt our operations and supply chain. Transitional risks range from regulatory frameworks and the rising price of carbon to the viability and customer acceptance of emerging technologies. Another transitional risk is our ability to set and meet Paris-aligned targets.

Physical Risks – Meteorological Risk

The performance and earning potential of the companies within the Group are significantly dependent upon meteorological conditions. While certain revenues for a generated (kWh) energy are guaranteed through state subsidy programs, the actual volume of energy generated is highly dependent on sunshine duration and solar irradiance. Our subsidiaries have historically based their cash flow planning on these assumptions. However, future climatic conditions could change, and predictions regarding weather patterns and hours of sunshine may prove inaccurate.

Meteorological risks include extreme weather events such as hurricanes, high winds, flooding, snow and icing, extreme heat, lightning and hailstorms, which can cause physical damage to solar panels. These conditions can reduce panel efficiency and accelerate material degradation, and lead to operational disruptions. Heavy rainfall and flooding can damage electrical components, while snow accumulation can significantly reduce energy production. Additionally, lightning and thunderstorms pose risks of power surges and system failures. Dust and sandstorms can also reduce panel efficiency and increase maintenance requirements.

The Group's business could be materially and adversely affected by these severe weather conditions, potentially causing power loss, communication failures, explosions or similar disruptions. In such cases, electricity generation at PV power plants would be below expected level, adversely affecting the installation's liquidity and the asset, financial, and earnings positions of the respective project companies and the Group as a whole.

To mitigate these risks, it is essential to design resilient PV systems using high-quality materials and advanced technology, such as tracker mounting systems for dynamic panel adjustments and tilt, to maximise energy capture from solar arrays and withstand unfavourable weather conditions. We have implemented a proactive maintenance schedule to ensure all components are in optimal working condition. We utilise advanced remote monitoring systems (24/7) and an early warning system with drones for regular inspections and maintenance of solar installations. Additionally, we are working on incorporation of battery storage systems to store excess energy generated during optimal conditions when possible. We have also diversified our business model adding new business lines such as new energy division, which partially offsets the seasonality of other PV business. Finally, we obtain comprehensive insurance policies that cover a wide range of natural disasters and regularly review and update the insurance coverage to ensure it aligns with current risks.

Physical Risks - Environmental Risk

The solar industry faces several environmental risks that can impact the efficiency, reliability and lifespan of PV installations. These environmental risks that teat our assets potentially could be wildfires, sea level rise, earthquake, landslides, and drought.

Wildfires pose a substantial threat to solar installations, particularly in regions prone to dry conditions and high temperatures. They can cause direct damage to solar panels and infrastructure through intense heat and flames. Additionally, smoke and ash from wildfires can reduce solar irradiance, decreasing the efficiency of solar panels.

Earthquake can cause structural damage to solar panels and mounting systems. The shaking can displace or crack panels, disrupt electrical connections, and damage inverters and other critical components.

Landslides, often triggered by heavy rainfall or seismic activity, can pose a severe risk to solar installations located on slopes or in mountainous regions. Landslides can bury solar panels, damage infrastructure, and disrupt operations.

Drought conditions can impact the solar industry by reducing the availability of water needed for cleaning and cooling solar panels. Water scarcity can lead to increased maintenance costs and reduced efficiency of solar installations. Additionally, prolonged periods of low rainfall can exacerbate the risk of wildfires, further threatening solar infrastructure.

We have implemented measures to mitigate environmental risks and protect our assets by maintaining defensive spaces around solar installations. This involves clearing vegetation to reduce fire fuel. We conduct regular maintenance to remove debris and ensure all components are in good condition. We perform site assessments at the feasibility stage to identify environmental risks and evaluate their materiality and probability. We continuously monitor water usage and implement conservation measures. Additionally, we use fire-resistant materials as feasible and necessary.

Policy and Regulatory Landscape Risk

The Group must comply with all applicable laws, regulations, and directives at the location of each PV power plant. These regulations cover airborne emissions, sewage, soil and groundwater protection, as well as health and safety standards. Changes in those regulations could pose a threat to the continuity of the Group's operations and business activities, may also prompt third parties to initiate legal proceedings or demand costly measures to control and remediate environmental pollution or to upgrade technical facilities. The potential risks include but are not limited to habitat loss and fragmentation, affecting local wildlife and ecosystems; restrictions on water resources and water pollution, waste generation and waste management related to the end-of-life disposal and utilisation of solar panels.

We conduct thorough environmental studies and secure the necessary permits during the project development stage to ensure compliance with all regulations. Our biodiversity project aims to minimise environmental impacts and mitigate the risks of regulatory sanctions, fines, and reputational damage. To prevent pollution, we refrain from using chemicals for cleaning solar panels. We ensure that our power plants are not situated in water-stressed areas and manage waste from remediation with care, disposing of it in accordance with local regulations.

Additionally, we are developing a comprehensive end-of-life waste management and disposal plan.

Supply Chian – Resource Risk

The production of solar panels necessitates the use of raw materials such as silicon, silver, and rare earth elements. If these materials are not sourced sustainably, it can result in significant resource depletion and environmental degradation.

We have implemented measures to ensure the continuity of our business operations. By diversifying our supplier base and maintaining an ongoing dialogue with key suppliers on environmental issues, we proactively address potential risks and foster sustainable practices.

Climate Risk Governance

At Photon Energy Group, sustainability is a core value, integral to the continual growth and success of our business. We are committed to an increasing focus on sustainability and the development of robust ESG practices. By adopting a strategic approach to sustainability, the Group addresses material risks, enhancing our resilience and adaptability in the face of challenges such as climate change and regulatory changes. This approach also fosters a space for new ideas and creative responses. In 2020, we laid the foundations for strategic management, control, and reporting practices that are fully geared toward sustainability and since then we continuously improve those practices and standards.

4.4 Financial and Business Records

Our books and records are prepared in regulatory detail and accurately reflect our transactions. All financial information is registered and reproduced in accordance with generally accepted accounting principles, with a system of internal accounting controls assuring that transactions are executed in compliance with management's authorisation: a controlling mechanism is used to facilitate delegation levels of authority and increase transparency with the four-eyes principles applied to every transaction.

Any accounting information is registered in accordance with applicable laws and relevant accounting standards. From the financial years 2013 to 2019 our Management Board appointed Grant Thornton Accountants en Adviseurs B.V. to serve as the auditor for Photon Energy N.V. and the group with its subsidiaries. The appointments were confirmed by the general meetings of Photon Energy N.V. The auditor's reports were part of our annual reports, which are available on our website.

Starting from the financial year 2020, the Management Board appointed PricewaterhouseCoopers Accountants N.V. to serve as the auditor for Photon Energy N.V. and the group with its subsidiaries. The appointment was confirmed by the Extraordinary General Meeting of Photon Energy N.V. held on 4 December 2020. PricewaterhouseCoopers Accountants N.V. also performed the audit of the Group's financial statements for the financial years 2021, 2022, 2023 and 2024.

Tax Governance GRI Control and Risk Management.

Local accounting departments in all countries of operation have been established to provide more resilience as operations grow. Taxation is looked at locally with local advisors, with a position opened in 2024 for an international tax manager.

From a financial point of view, the Company has a four-eye principle to cross-check operations. For example, we have split compliance and legal functions to achieve better governance. This included the appointment of a risk manager to support internal audit functions.

4.5 Anti-corruption

Our reputation for integrity is critically important, and we are committed to ensuring that all employees, customers and suppliers act in an ethical manner and ensure that stakeholders are not the subject of unethical behaviours such as corruption, bribery, extortion or insider trading. We believe in free competition and will compete fairly, through honest business practices.

Corruption erodes trust, weakens democracy, hampers economic development, and further exacerbates inequality, poverty, social division and environmental degradation. Photon Energy Group has never been the subject of any controversies, illustrating our ability to manage our relations with stakeholders.

Anti-corruption and Anti-bribery Policy

As previously reinforced, renewable energy companies may have close ties with government officials, as well as relationships with suppliers, third-party contractors and utility customers, and these relationships could be exploited for financial gain. We have recently implemented an anti-corruption and anti-bribery policy within the company and have introduced a whistleblowing system and an ad-hoc disciplinary committee, composed representatives from our HR and Legal departments, a member of the Board and a compliance officer. This committee will be assembled to discuss any breaches of our anti-corruption and anti-bribery policy and decide on the necessary course of action.

The Anti-Bribery and Corruption Policy was updated in 2022 to include rules on providing and receiving gifts, as well as reporting violations in accordance with the rules of the Photon Energy Group Misconduct Reporting Policy described below. Additionally, a separate training on our anti-corruption and anti-bribery policy was introduced in 2024.

Misconduct Reporting Policy and SpeakUp Line

In line with current regulations as well as our own values and expectations, we have developed a Misconduct reporting policy and instituted the Photon Energy Group SpeakUp Line, a channel for employees, consultants, suppliers, and stakeholders to report misconduct and contradicts our Code of Ethics in relation to our business and operations. If you have experienced potential violations or unethical behaviour, you can help us by reporting your concern through the whistleblowing channel.

This includes activities which could be interpreted or perceived as:

- Illicit or illegal
- In contradiction with the values and principles described in our Code of Ethics and other internal policies
- Harmful to Photon Energy Group, our employees or contractors, or our reputation as an entrepreneur, competitor and employer

This whistleblowing channel is available through internal channels and our corporate website. The system is encrypted and administered by an independent third-party service provider. All whistleblowers have the option to remain anonymous. For employees, the SpeakUp Line is a means to report concerns through a secure, confidential channel in cases where they may be uncomfortable going through their line manager. Photon Energy Group will not sanction anyone who reports in good faith. As of this report's publication, no incidents have been reported through the SpeakUp Line.

Reports through our whistleblowing channel is supervised by Legal and Compliance. You can read more about whistleblowing in our SpeakUp Line.

Insider Trading Policy

An insider trading policy is signed by all employees along with their contract of employment. This policy was developed to make sure employees understand their obligations to preserve the confidentiality of undisclosed information and to protect them and the company against legal liability. Employees who have permanent access to confidential information are subject to trading restriction periods and to trading notifications. They are reminded of their obligations on a quarterly basis.

Legal Actions for Anti-competitive Behaviour, Anti-trust, and Monopoly GRI Practices

In the reporting year 2024, there were no legal actions due to anticompetitive behaviour or violations of antitrust and monopoly law in which Photon Energy Group was an involved party. No political contributions neither cash nor non-cash contributions were made.

4.6 Responsible Procurement

Sustaining a responsible supply chain and enhancing our focus on the value chain is a key part of our sustainability efforts. We seek to understand, monitor, and report on key ESG risks and performance in our supply chain and select and develop suppliers with strong sustainability practices.

Keen to engage in long-term relationships with our stakeholders, we are careful in our selection of suppliers and subcontractors, seeking responsible partners who comply with our exacting standards for responsible procurement.

We have in place both a Code of Ethics and a Procurement Policy, as well as a strengthened due diligence process. The Procurement Policy provides detailed guidelines for the selection of suppliers, and our Third-Party conduct principles were integrated to our newly concluded contracts.

Our supply chain involves sourcing high-quality photovoltaic components from leading manufacturers worldwide. We ensure that our suppliers adhere to high quality and sustainability standards to support our commitment to delivering reliable and efficient solar energy solutions.

Code of Ethics

The Code of Ethics contains a section with specific rules of conduct for purchasing and procurement. According to this, purchasing decisions must be strictly aligned with Photon Energy Group's interests, which exclusively concern objective criteria such as anti-corruption, quality, price, production requirements and logistics. Employees involved with procurement are explicitly banned from seeking personal benefits in return for preferential treatment, with the acceptance of gifts and event invitations also restricted to an absolute minimum.

We have ensured that any of our individual suppliers have infringed upon human rights, in particular the right to freedom of association or collective bargaining, nor the ban on child and forced labour. If we become aware of violations of the ban on child and forced labour in accordance with International Labour Organisation (ILO) conventions, or the enforcement of statutory minimum health and safety standards through audits or notifications, this will lead us to halt all business with the supplier concerned.

Our Code of Ethics was updated in 2022 to integrate principles regarding the prohibition of gender-based violence and harassment (GBVH). A training course on Code of Ethics is developed for all our employees, and mandatory for all employees.

Due Diligence for Our Supply Chain

We created a Third-party Code of Conduct setting clear expectations for our technology suppliers with regards to ethics, human rights principles, health and safety, and environmental issues. The document has been integrated to our concluded contracts.

We have conducted a comprehensive revision of our Third-Party Conduct Principles to strengthen our dedication to responsible procurement practices and to enhance human rights due diligence throughout our supply chain. This revision reflects our unwavering commitment to upholding the highest ethical standards and ensuring that our business operations align with our core values of integrity, community, sustainability, and respect for human rights. By enhancing our principles, we aim to foster transparency, accountability, and sustainable business practices across all levels of our supply chain, thereby contributing to the well-being of workers and communities.

We are not aware of any violations of our procurement principles in 2024.

Photon Energy Group purchases goods and services from a wide variety of suppliers, ranging from large international companies to specialist local suppliers worldwide. Sustaining a responsible supply chain and enhancing our focus on the value chain is a key part of our sustainability efforts. We seek to understand, monitor, and report on key ESG risks and performance in our supply chain. Photon Energy Group selects and develops suppliers with strong sustainability practices.

Three-Stage Screening Process

- Request for information from suppliers for pre-qualification covering legal due diligence
- Desktop due diligence of the documents requested including ESG aspects
- Final audit and in-depth due diligence on shortlisted suppliers prior to contractual agreement

After the screening process, we seek to continuously monitor and control our work with and relationship to our suppliers. All suppliers must sign our Third-Party Code of Principles. We appoint dedicated resources to follow up directly on quality and policy implementation during the construction phase. In 2024, 100% of our contracted suppliers signed our Third-Party Code of Principles.

Renewable energy projects may trigger environmental and social impacts. We endeavour to minimise our negative impacts, maximise local benefits, and ensure constructive dialogue with all project stakeholders. In all our work, we pay special attention to the human rights.

4.7 Donation Policy

In order to define a relevant and structured scope of action related to charities, donations and sponsorships, a Donation Policy has been created. This policy has the following objectives:

- Providing guidelines around donations
- Supporting initiatives consistent with one another
- Better delivering on our commitment to support organisations whose vision and values align with our own.

We believe that through donations and CSR Days we could have both social and environmental benefits. It allows us to assist some of the most vulnerable members of our local communities.

4.8 ESG Standards

At Photon Energy Group we set goals is to continually improve the quality of the services we provide; we are committed to working according to internationally recognised standards. This Sustainability Report has been prepared in accordance with GRI Standards. The content index presented in the Annex aims to provide our partners with references to appropriate sections in the body of the report. This content index has not been reviewed by a third party, nor by the GRI Material Disclosure Service.

An environmental management system is in place, which takes into consideration environmental and climate protection as well as maintaining an active dialogue with key stakeholders to identify the environmental risks and impacts of our work.

For projects which may be developed in emerging countries in the future, we intend to perform stakeholder and engagement analyses in accordance with the International Finance Corporation's performance standards. These standards address and mitigate negative local impacts by developing and implementing resettlement and livelihood restoration plans and require the establishment of long-term monitoring mechanisms.

Our priority is to redesign our internal policies to achieve the best and most efficient integrated management system by utilising quality, workplace health and safety, and environment as performance objectives. A team of managers has now been assigned to regularly review our internal procedures to ensure they are compliant and effective, and to measure sustainability actions to adjust our goals as necessary.

Frameworks and Assurance

Photon Energy Group's policy and practice for seeking external assurance on our ESG data and sustainability reporting will be aligned to our Company's annual financial audits.

In 2024, we received ESG Transparency Award, an 'Excellent Class' rating and being chosen as 'Leading Company' in ESG transparency from EuPD Research Centre, achieving a score of 82/100. This outstanding accomplishment reflects our dedication, and we are actively working to further improve our rankings.

Photon Energy Group's ESG performance has been evaluated by IMUG, a leading German sustainability rating agency. In May 2023, our ESG performance was rated as "very good", scoring 77/100. This rating reflects our strong commitment to sustainability and responsible business practices.

Green Financing Report

5. Green Financing Report

Photon Energy N.V. issued its first green bond in November 2021, in line with the Green Bond Principles 2021.

This Green Financing Report was prepared to enable bondholders and other stakeholders to follow the development of the assets and projects funded by the proceeds from our 2021/2027 Green EUR Bond, which was issued and placed according to the following schedule:

- On 17 November 2021, we successfully placed our first EUR 50 million of 6.50% Green EUR Bond 2021/2027 (ISIN: DE000A3KWKY4), hereinafter referred as the "Green EUR Bond".
- On 24 November 2021 based on the Management Board resolution the Green EUR Bond was tapped by EUR 5 million to a total of up to EUR 55 million.
- On 25 May 2022, the Company successfully tapped the Green EUR Bond by additional EUR 10 million.
- On 1 September 2022 the Management Board resolved to tap the Green EUR Bond by an exchange offer to bondholders of the existing 2017/2022 corporate bonds and a public offer with subsequent private placement in the aggregate principal amount of up to EUR 25 million. As a result of this offer, including the exchange offer the Company increased the total outstanding amount of Green EUR Bond to EUR 77.5 million.
- In March 2023, the Green EUR Bond was tapped by additional EUR 2.5 million to EUR 80.0 million.
- In the course of 2023, the Company repurchased on the market the nominal value of EUR 0.615 million and in the course of 2024 the Company repurchased the nominal value of EUR 0.465 million of its EUR Green Bond.

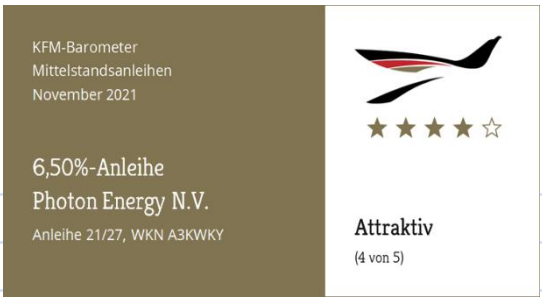
Our Green Financing Framework has obtained a second party opinion from imug rating, an independent institution in Germany, confirming that the framework for the Green EUR Bond is in line with the Green Bond Principles 2021.

This Green Financing Framework provides the basis of all allocations and impact reporting in this Green Financing Report to enable investors, bondholders and other stakeholders to follow the development of the assets and projects funded by our Green EUR Bond.

The Green EUR Bond was the first green bond issued by Photon Energy N.V. and was confirmed by imug rating with regards to its sustainability and compliance with the ICMA principles in a Second Party Opinion.

The Green EUR Bond is traded on the Open Market of the Frankfurt Stock Exchange.

Bond	**GREEN EUR Bond 2021/2027**
Volume	EUR 78.9 million
Coupon	6.50% p.a., quarterly payment
Initial offering	23 November 2021
Ratings/Awards	▸ IMUG | rating – second party opinion, ▸ KFM Barometer 4 of 5 stars ▸ Best Issuer Green SME Bonds 2021
Segment	Secondary market: trading on Open Market of the Frankfurt Stock Exchange since 23 November 2021
Covenants	▸ Dividend restriction (max 50% if EBITDA/ICR > 2) ▸ Group Equity ratio ≥ 25%* ▸ Cross default ▸ Negative pledge ▸ Pari passu ▸ Change of Control-Clause ▸ Transparency clause
Denomination	EUR 1,000
Term / Redemption	Six years / 23 November 2027 at par
ISIN	DE 000A3KWKY4



* Adjusted Equity ratio is calculated as: Total Equity / Loans and Borrowing (non-current liabilities) + Issued Bonds and Other Long-term Liabilities + Loans and Borrowing (current liabilities) + Issued Bonds and Other Loans (current liabilities).

5.1 Use of Proceeds from Our Green Bond

An amount equivalent to the net proceeds from our Green EUR Bond have been used to finance or refinance, in part or in full, projects or assets providing distinct environmental benefits or financial instruments that were used to finance such projects or assets ("Green Eligible Projects").

Green Eligible Projects are more specifically defined as investments in renewable energy sources. This also includes the development and acquisition of such projects as well as investments in share capital of companies with such assets, where Photon Energy Group has significant operational influence and where the use of proceeds should be directly linked to the book value of the Green Eligible Projects owned by the acquired company, adjusted for the share of equity acquired.

Our Green EUR Bond provides funds for investment activities and related expenditures, directed towards the acquisition, development and/or construction of facilities that produce electricity from solar power or hybrid solutions, possibly combined with energy storage. Only activities that comply with the criteria below will be deemed eligible.

Net proceeds can be used for:

- The financing of new Green Eligible Projects
- The refinancing of existing Green Eligible Projects or the refinancing of financial instruments that were used to finance such Green Eligible Projects

In 2024, Green Eligible Projects were mainly developed and built in Romania and Hungary.

In 2024, the remaining net proceeds (not allocated in previous years and increased through an additional placement) of our first Green EUR Bond were allocated in the following manner:

- Projects in development, under construction and commissioned in Hungary, and Romania in a total of EUR 4.15 million.

The amount allocated in 2024 completely exhausted the remaining liquid funds. As a result, as of 31.12.2024, the total net proceeds from the Green EUR Bond have been fully allocated. With our allocated Green EUR Bond proceeds, we support progress towards the Paris Agreement and aspire to have a transformative impact on the UN Sustainable Development Goals: #7 on affordable and clean energy and #13 on climate action.

In thousands of EUR		2023	2024
Green EUR Bond 2021/2027 Outstanding Amount as of 1 January		**77,500**	**79,385**
Increase of Net Proceeds	Placement of Green EUR Bond in the period	2,500	0
Decrease of Net Proceeds	Repurchase of Green EUR Bond in the Period	-615	-465
Green EUR Bond 2021/2027 Outstanding Amount as of 31 December		**79,385**	**-78,920**
Transaction Costs	Costs of the preparation of the Green EUR Bond incurred in the period	-1,718	-
Accumulated Transaction Costs	Total costs for the preparation of the Green EUR Bond Issue and the Offer	-1,718	-1,718
Net Proceeds from Green EUR Bond as of 31 December		**77,667**	**77,202**
Net Proceeds Allocated	Amount Allocated to Green Eligible Projects, in the period	-14,160	-4,150
	Amount Allocated to the Exchange Offer of EUR Bond 2017/2022, in the period	0	0
Total Allocated Net Proceeds	Accumulated, Allocated Net Proceeds	-73,052	-77,202
Liquid Assets	Accumulated Net Proceeds, still Not Allocated in the period	4,615	0

Summary of Net Proceeds Allocated for Green Eligible Projects in 2024

Green Eligible Projects	Green Asset Category	Capacity / Expected Capacity	Status	Amount Allocated EUR 000s
Bocsa, Romania	PV project	3.8 MWp	Commissioned	-13
Ciuperceni, Romania	PV project	53 MWp	Development	-367
Faget 2, Romania	PV project	3.9 MWp	Commissioned	-77
Faget 3, Romania	PV project	7.5 MWp	Commissioned	-288
Faget 4, Romania	PV project	6.5 MWp	Development	-433
Faget 5, Romania	PV project	6.5 MWp	Development	-296
Tamadau, Romania	PV project	10.2 MWp	Development	-160
Vadul lzei, Romania	PV project	3.8 MWp	Development	-371
Giulvaz, Romania	PV project	6.5 MWp	Development	-212
Sarulesti, Romania	PV project	3.2 MWp	Commissioned	-20
Sahateni, Romania	PV project	7.1 MWp	Commissioned in Aug. 2023	-58
Sannicolau Mare, Romania	PV project	7.5 MWp	Development	-150
Magureni, Romania	PV project	1.7 MWp	Commissioned	-14
Rovine, Romania	PV project	2.7 MWp	Unfeasible Connection – Ended	-1
Milcovatu, Romania	PV project	-	Unfeasible Connection – Ended	-5
Various projects, Romania	PV projects	21.5 MWp	Development	-31
Various projects, Czech Republic	Monitoring system	-	Development	-0.4
Various projects, Czech Republic	Labour allocation	-	Development	-8
Facankert, Hungary	PV project	1.4 MWp	Commissioned	-0.7
Tolna 1, Hungary	PV project	1.4 MWp	Commissioned in Dec. 2021	-1
Tolna 4, Hungary	PV project	1.4 MWp	Development	-8
Tolna 6, Hungary	PV project	1.4 MWp	Development	-8
Faurecia, Hungary	PV project	0.6 MWp	Commissioned	-256
Gyermelyi, Hungary	PV project	-	Unfeasible Connection – Ended	-0.4
Ladny Solar Delta, Hungary	PV project	5.1 MWp	Under Construction	-725
Other projects, Hungary	PV projects	-	No Connections – Ended	-2
Yadnarie, Australia	PV project combined with energy storage	150 MWp and 115 GWh of energy storage	Development	-151
Boggabri, Australia	PV project combined with energy storage	9.8 MWp and 10 MWh solar and battery energy storage	Development	-0.3
Other projects, Australia	PV projects	-	Development	-132
Wysokie Mazowieckie, Poland	PV project	20.3 MWp	Co-Development	-127
Zawada, Poland	PV project	4.3 MWp	Co-Development	-212
ZŁOCZEW, Poland	PV Project	2.3 MWp	Development	-4
Various projects, Poland	PV projects	252.5 MWp	Development	-19
Total				**-4,150**

Share of Net Proceeds Used for Financing of Green Eligible Projects in the period *(%)*	**5.4%**
Liquid Assets	**0**

5.2 Impact Report

The Impact Report discloses the environmental impact of the Green Eligible Projects financed under our Green Financing Framework.

- **Annual renewable energy generation (MWh), in total and compared to plans:** for every project, an audit is conducted by an external party to determine what the output will be like on a monthly basis. Thanks to our in-house monitoring system we are able to track the annual renewable energy generation (MWh) compared to these audits. In our periodic reports, we disclose the actual energy generation of our PV power plant commissioned, including those PV power plants that represent the investments of proceeds from our 6.50% Green EUR Bond 2021/2027.
- **Capacity of renewable energy power plants constructed (MWh), in total and per renewable energy technology (solar power, concentrated solar):** we are able to track this breakdown, as we are building our projects in-house.
- **Estimated annual greenhouse gas emissions avoided (tCO_2e):** the CO_2e avoided connected to the green electricity generated by our proprietary portfolio are based on the International Financial Institutions Technical Working Group on Greenhouse Gas Accounting (IFI TWG) 2022 report, which can be found here.
- **Energy storage and other energy solutions – capacity and technology of electricity storage installed (MWh):** the capacity associated to projects will be provided by our project development teams, which are determined based on individual project characteristics. These data are subject to evolution over the time, until the end of the construction process.

Estimated Annual Greenhous Gas Emissions Avoided Thanks to the Actual Energy Generated by Eligible Projects in 2024.

Green Eligible Assets (Connected)	Capacity	Actual Energy Generation	Status	Estimated annual greenhouse gas emissions avoided
	In MWp	*In MWh*		*In tonnes of CO_2e*
Tolna 1, Hungary	1.4	1,477	Commissioned in Dec 2021	380
Facankert, Hungary	1.4	1,550	Commissioned in May 2022	398
Faurecia, Hungary	0.6	741	Commissioned in Sep 2024	190
Faget 1, Romania	3.2	4,694	Commissioned in Aug 2023	1,943
Faget 2, Romania	3.9	5,659	Commissioned in Jan 2024	2,343
Faget 3, Romania	7.5	1,513	Commissioned in Sep 2024	626
Bocsa, Romania	3.8	5,306	Commissioned in Feb 2024	2,197
Sarulesti, Romania	3.2	204	Commissioned in Oct 2024	84
Magureni, Romania	1.7	1,676	Commissioned in April 2024	694
Sahateni, Romania	7.1	10,549	Commissioned in Aug 2023	4,367
TOTAL	**33.8**	**33,369**		**13,222**

Estimated Annual Greenhouse Gas Emissions to be Avoided by the Expected Production Through Eligible Projects Annually.

Green Eligible Projects (development / construction)	Expected Capacity	Annual Expected Production	Status	Estimated annual greenhouse gas emissions avoided
	In MWp	*In MWh*		*In tonnes of CO_2e*
Tolna 4, Hungary	1.4	2,122	Development	545
Tolna 6, Hungary	1.4	2,122	Development	545
Ladny Solar Delta, Hungary	5.1	6,277	Under construction in 2024, commissioned in March 2025	1,613
Total Hungary	**7.9**	**10,521**		**2,703**
Ciuperceni, Romania	53	84,800	Development	35,107
Faget 4, Romania	6.5	9,500	Development	3,933
Faget 5, Romania	6.5	9,500	Development	3,933
Giulvaz, Romania	6.5	9,623	Development	3,984
Vadul lzei, Romania	3.8	5,405	Development	2,238
Tamadau, Romania	10.2	15,821	Development	6,550
Sannicolau Mare, Romania	7.5	11,100	Development	4,596
Various projects, Romania	21.5	32,250	Development	13,352
Total Romania	**115.5**	**177,999**		**73,693**
ZŁOCZEW, Poland	2.3	3,125	Development	2,241
Wysokie Mazowieckie, Poland	20.3	27,811	Development	19,940
Zawada, Poland	4.3	5,784	Development	4,147
Various projects, Poland	252.5	321,938	Development	230,829
Total Poland	**279.4**	**358,658**		**257,157**
Yadnarie, Australia (115 GWh of storage capacity)	150.0	500,000	Development	331,500
Boggabri, Australia (10 MWh of energy storage)	9.8	16,464	Development	10,916
Total Australia	**209.8**	**683,131**		**342,416**
TOTAL	**562.6**	**1,230,309**		**675,969**

6. Contact Details

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sustainability@photonenergy.com

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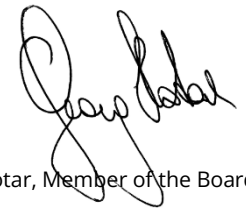
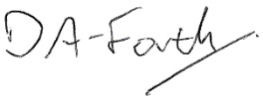
Amsterdam, 24 April 2025



Georg Hotar, Member of the Board of Directors



David Forth, Member of the Board of Directors

7. Annex: ESG Key Performance Indicators

Environmental Data	2024	2023	2022	2021	2020
Percentage of revenues connected to activities which create sustainable value	100%	100%	100%	100%	100%
Clean energy generated by our proprietary portfolio of PV power plants	162.8 GWh	139.8 GWh	121.6 GWh	103.3 GWh	70.0 GWh
Assessment of our carbon footprint across scope 1 and 2 emissions (CO_2e tonnes)	665.8	670.8	409.6	342.8	286.6
CO_2e savings	66,682 tonnes *(+14.4%)*	58,286 tonnes *(+19.0%)*	49,013 tonnes *(+11.7%)*	43,867 tonnes *(+47.8%)*	29,799
Social Data					
Number of full-time staff / number of employees	313 / 335 *(93.4%)*	328 / 348 *(94.3%)*	212 / 220 *(96%)*	141 / 144 *(98%)*	133 / 136 *(98%)*
Percentage of female employees	37%	37%	37%	37%	33%
Female vs. male employees per level					
- **Board member**	0.0%	0.0%	0.0%	0.0%	0.0%
- **Senior and mid level management**	24%	30%	15%	26%	28%
- **Professionals and administrations**	40%	39%	40%	42%	41%
Number of employees who completed training courses* **	286 / 335 *(85%)*	230 / 348 *(66%)*	154 / 220 *(70%)*	64 / 144 *(44%)*	50 / 136 *(37%)*
Turnover ratio	23.5%	35.4%	23%	na	na
Gender Pay Gap between male and female employees as a % of male gross salary *analysis performed based on comparable job positions*	7.9%	0.3%	2.3%	na	na
Parental leave	437 *(weeks)*	359 *(weeks)*	182 *(weeks)**	na	na
Lost time injuries	0	0	0	0	0
Ratios of standard entry level wage by gender compared to local minimum wage *	0.91	na	na	na	na
Annual Total Compensation Ratio**	3.2	na	na	na	na
Governance Data					
Contributions to political parties as percentage of total revenues	0%	0%	0%	0%	0%
Claims against the Company ruled by a court as a percentage of total revenues	0%	0%	0%	0%	0%
Gender equality Board of Directors (Female/Male)	0%	0%	0%	0%	0%
Gender equality Supervisory Board (Female/Male)	33%	33%	33%	50%	50%
Responsible procurement, subjected to due diligence	100% of our technology purchases	100% of our technology purchases	100% of our technology purchases	na	na

**Presented as an average of all the ratios across the countries of operation.*

***Presented as an average of all the ratios across the countries of operation.*

**** The numbers for 2022 have been corrected based on the revised data.*

8. GRI Content Index

This Sustainability report has been prepared in accordance with the GRI Standards. This content index is presented to provide our partners with clear references to appropriate sections in the body of the report. This content index has not been reviewed by a Third-Party, nor by the GRI Material Disclosure Service.

GRI Standards	Disclosure	Location	Comments
GRI 2: General Disclosures 2021	2-1 Organizational details	p. 4	
	2-2 Entities included in the organization's sustainability reporting	p. 8	
	2-3 Reporting period, frequency and contact point	p. 1, 50	
	2-4 Restatements of information		*Not relevant*
	2-5 External assurance	p. 43	
	2-6 Activities, value chain and other business relationships	p. 7, 30, 42	
	2-7 Employees	p. 30	
	2-8 Workers who are not employees	p. 30	
	2-9 Governance structure and composition	p. 38-39	
	2-10 Nomination and selection of the highest governance body	p. 38	
	2-11 Chair of the highest governance body	p. 38	
	2-12 Role of the highest governance body in overseeing the management of impacts	p. 38	
	2-13 Delegation of responsibility for managing impacts	p. 38	
	2-14 Role of the highest governance body in sustainability reporting	p. 38	
	2-15 Conflicts of interest	p. 38	
	2-16 Communication of critical concerns	p. 41	
	2-17 Collective knowledge of the highest governance body		*Please check our Annual Report*
	2-18 Evaluation of the performance of the highest governance body	p.39	
	2-19 Remuneration policies		*Please check our Annual Report*
	2-20 Process to determine remuneration		*Please check our Annual Report*
	2-21 Annual total compensation ratio	p. 51	
	2-22 Statement on sustainable development strategy	p. 8	
	2-23 Policy commitments	p. 8, 38	*Sustainability and ESG* *Code of Ethics* *Third Party Conduct Principles* *Anti-Bribery and Corruption Policy*
	2-24 Embedding policy commitments	p. 8, 38	
	2-25 Processes to remediate negative impacts	p. 17, 19, 22, 31, 34, 36, 38, 41-42	
	2-26 Mechanisms for seeking advice and raising concerns	p. 38, 41	
	2-27 Compliance with laws and regulations	p. 12, 38	
	2-28 Membership associations	p. 10	
	2-29 Approach to stakeholder engagement	p. 10	
	2-30 Collective bargaining agreements		*Collective bargaining has been incorporated into the Photon Energy Group Code of Ethics*

			and considered as employee's basic rights and a basic rule of company conduct.
Material Topics			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	p. 41	
	3-2 List of material topics	p. 11	
Economic performance			
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	p. 7	
	201-2 Financial implications and other risks and opportunities due to climate change		*Not disclosed.*
	201-3 Defined benefit plan obligations and other retirement plans	p. 32	
	201-4 Financial assistance received from government		*Not relevant (We are independent electricity producers and have no connection to governments. State support is limited to feed-in tariffs for some of our proprietary power plants.)*
Market presence			
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	p.51	
	202-2 Proportion of senior management hired from the local community	p. 30	
Indirect economic impacts			
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	p. 7	
	203-2 Significant indirect economic impacts	p. 34	
Procurement practices			
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	p. 34	
Anti-corruption			
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	p. 38	*Photon Energy Group's operations risks assessed in each phase of project.*
	205-2 Communication and training about anti-corruption policies and procedures	p. 31	
	205-3 Confirmed incidents of corruption and actions taken	p. 41	
Anti-competitive behavior			
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	p. 42	
Tax			
GRI 207: Tax 2019	207-1 Approach to tax	p. 41	
	207-2 Tax governance, control, and risk management	p. 41	
	207-3 Stakeholder engagement and management of concerns related to tax	p. 41	
	207-4 Country-by-country reporting		*Not disclosed at the country level in this report*
Materials			
GRI 301: Materials 2016	301-1 Materials used by weight or volume		*Not disclosed*
	301-2 Recycled input materials used		*Not applicable*
	301-3 Reclaimed products and their packaging materials	p. 20	
Energy			
GRI 302: Energy 2016	302-1 Energy consumption within the organization	p. 18	
	302-2 Energy consumption outside of the organization		*This indicator is currently not measured.*

	302-3 Energy intensity	p. 18	
	302-4 Reduction of energy consumption		*Not disclosed.*
	302-5 Reductions in energy requirements of products and services		*Not disclosed.*
Water and effluents			
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	p. 20	
	303-2 Management of water discharge-related impacts	p. 20	
	303-3 Water withdrawal		*Not disclosed*
	303-4 Water discharge	p. 20	
	303-5 Water consumption	p. 20	*Partially disclosed – without description of the sources.*
Biodiversity			
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	p. 22	
	304-2 Significant impacts of activities, products and services on biodiversity	p. 22	
	304-3 Habitats protected or restored	p. 20-22	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations		*Not encountered any endangered species in the proximity of our PV plant construction.*
Emissions			
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	p. 17, 18	
	305-2 Energy indirect (Scope 2) GHG emissions	p. 17	
	305-3 Other indirect (Scope 3) GHG emissions	p. 17, 18	*Business travel and Commuting*
	305-4 GHG emissions intensity	p. 18	
	305-5 Reduction of GHG emissions		*Not disclosed.*
	305-6 Emissions of ozone-depleting substances (ODS)		*This indicator is currently not measured*
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions		*This indicator is currently not measured*
Waste			
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	p. 19	
	306-2 Management of significant waste-related impacts	p. 19	
	306-3 Waste generated		*Not disclosed.*
	306-4 Waste diverted from disposal		*Not disclosed.*
	306-5 Waste directed to disposal		*Not disclosed.*
Supplier environmental assessment			
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	p. 42	
	308-2 Negative environmental impacts in the supply chain and actions taken		*Not encountered any actual or potential negative impacts.*
Employment			
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	p. 31, 32	*The age of the employees is not reported in this report; and turnover is not disclosed per region, age, and gender.*
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	p. 32	
	401-3 Parental leave	p. 51	*Parental leave data is not disclosed by gender, nor is the number of employees who returned to work during the reporting year. The reported numbers represent those who*

			were employees of Photon Energy Group during the reporting year.
Labor/management relations			
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes		*According to the local regulations.*
Occupational health and safety			
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	p. 34	
	403-2 Hazard identification, risk assessment, and incident investigation	p. 35	
	403-3 Occupational health services	p. 35	
	403-4 Worker participation, consultation, and communication on occupational health and safety	p. 35	
	403-5 Worker training on occupational health and safety	p. 35	
	403-6 Promotion of worker health	p. 35	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	p. 35	
	403-8 Workers covered by an occupational health and safety management system	p. 35	
	403-9 Work-related injuries	p. 36	
	403-10 Work-related ill health	p. 36	
Training and education			
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee		*Not disclosed.*
	404-2 Programs for upgrading employee skills and transition assistance programs	p. 31	
	404-3 Percentage of employees receiving regular performance and career development reviews	p. 31	
Diversity and equal opportunity			
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	p. 15, 31	
	405-2 Ratio of basic salary and remuneration of women to men	p. 51	
Non-discrimination			
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken		*Not encountered any incidents.*
Freedom of association and collective bargaining			
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		*The freedom of association and collective bargaining have been considered as the basic rights of employees.*
Child labor			
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	p. 42	
Forced or compulsory labor			
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	p. 42	
Security practices			
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures		*Not disclosed.*

Rights of indigenous peoples			
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples		*Not encountered any incidents.*
Local communities			
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	p. 34	
	413-2 Operations with significant actual and potential negative impacts on local communities	p. 34	
Supplier social assessment			
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	p. 42	
	414-2 Negative social impacts in the supply chain and actions taken		*Not encountered any incidents.*
Public policy			
GRI 415: Public Policy 2016	415-1 Political contributions	p. 51	*Photon Energy Group does not make donations or contributions to political parties, candidate.*
Customer health and safety			
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories		*No relevant*
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services		*Not encountered any incidents.*
Marketing and labelling			
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labelling		*Not applicable.*
	417-2 Incidents of non-compliance concerning product and service information and labeling		*Not applicable.*
	417-3 Incidents of non-compliance concerning marketing communications		*Not applicable.*
Customer privacy			
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data		*Not relevant*