

Environmental and Social Policy

wpd GmbH

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1. INTRODUCTION

For wpd GmbH (hereafter wpd), sustainability and the respectful treatment of the environment and stakeholders are essential guiding principles. This commitment extends beyond advancing the energy transition and supplying renewable energy to ensuring that wpd conducts all business activities in an environmentally and socially responsible manner.

While conducting our business activities, we recognize our responsibility to protect the environment including natural resources, biodiversity and ecosystems, and our stakeholders¹ within the area of influence of our projects. Thus, we adopt environmental and social management as an essential part of our business and comply with all applicable standards and requirements.

Our Environmental and Social Policy (E&S Policy) represents the commitment made by us to manage environmental and social (E&S) risks and impacts across our offices and facilities, projects in development and onshore wind farms and solar PV parks in construction and operation worldwide in a consistent manner. This policy applies to all our business areas, entities, subsidiaries and employees and workers globally, covering activities both at the corporate level and throughout the lifecycle of our projects. We actively communicate our commitment to E&S to all suppliers and business partners and expect them to uphold the same standards.

2. APPLICABLE STANDARDS

Our E&S Policy has been aligned with a range of applicable standards. These sources have informed the principles, procedures, and commitments outlined in this policy.

- Applicable local and national environmental and social legislation and obligations
- Equator Principles (EP4) and where applicable IFC Performance Standards
- International Labour Organization (ILO) Conventions
- OECD Guidelines for Multinational Enterprises (OECD MNE)

¹ Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who have interests in a project and/or the ability to influence its outcome, either positively or negatively.

3. ENVIRONMENTAL AND SOCIAL COMMITMENTS

3.1. Environmental Management

We commit to protect the environment where we operate by adhering to the following principles:

- Advancing the global energy transition by delivering wind and solar projects that increase renewable energy capacity and foster long-term sustainability. These technologies contribute to a reduction in greenhouse gas (GHG) emissions and climate change.
- Aligning with all applicable national environmental standards and obligations.
- Committing to managing our business activities in a way that safeguards natural resources and their environmental quality, biodiversity and ecosystems, ensuring that our operations contribute positively to environmental sustainability.
- Integrating biodiversity impact assessment and management based on the mitigation hierarchy (avoid, minimize, restore and compensate) into the entire project lifecycle.
- Prioritizing avoidance of critical habitats (as defined in International Finance Corporation's Guidance Note 6) for site selection of our projects, and implementing the mitigation (if applicable) of impacts on critical habitats.
- Avoiding to the extent possible, conversion of wetlands into developed areas. This avoidance includes legally recognized habitats such as those that have gone through a legislative process of protection in a particular country, those not legally protected but that fit the scientific definition of wetlands which provide important ecosystem services, and those protected by international treaties (e.g. RAMSAR Convention).
- Avoiding impacts on ecosystem services on which communities rely and consulting and collaborating with stakeholders early in project planning and development phase to ensure that all ecosystem services have been assessed.
- Committing to the efficient use of energy, water, and key resources; to the adoption of emission-reduction technologies where feasible; and to prioritizing locally sourced materials for supplying construction materials to minimize environmental impacts and transportation-related emissions.
- Seeking to implement the principles that guide circularity in its operations by maximizing participation in life-cycle approaches, and by maximization of reuse, recycle or ultimately safe disposal through the entire lifetime of the product/service in use.
- Controlling and reducing air, water and soil pollution by implementing environmental management plans throughout the project lifecycle.
- Working responsibly in transportation, handling, storage, and disposal of hazardous chemicals used during the construction, operation and decommissioning/repowering of our projects as well as hazardous and non-hazardous waste.
- Encouraging our employees, contractors, and suppliers to adopt the four pillars of the waste-management hierarchy—prioritizing prevention and reduction, followed by recovery, reuse, recycling, adequate treatment, and finally, as a least preferred, proper disposal of waste.
- Considering to prioritize the use of non-chemical measures to control economically significant pests and vectors wherever feasible, as well as to limit the use of non-local seeds and plants in revegetation and recultivation of disturbed areas in our projects giving preference to native or locally adapted species to protect biodiversity and ecosystem integrity.

3.2. Social Management

- Aligning with all applicable national social standards and obligations.
- Complying with wpd's Human Rights Policy and wpd's Health and Safety Policy for social risk and impact management of the projects.
- Committing to responsible business practices that safeguard the wellbeing of affected communities and workers, while contributing positively to social sustainability.
- Conducting a detailed social impact assessment to manage potential social risks and impact regarding the project activities, in line with applicable standards, if necessary.
- Training and empowering our own workforce in E&S topics related to their specific activities to strengthen corporate shared E&S culture and commitments.
- Performing a robust stakeholder engagement about our activities through a transparent, timely and two-way communication process and providing open lines of communications (direct and anonymous) for workers and community members to raise grievances or suggestions.
- Seeking to avoid any adverse effects on indigenous peoples and to other communities (e.g., mainstream, vulnerable) including tangible and intangible cultural heritage, in the geographic area of influence of wpd's operations.
- Avoiding negative impacts on land ownership through acquisition and resettlement (when applicable) and mitigating potential economical displacement through livelihood restoration measures.
- Working to maximize positive impacts on stakeholders such as those generated by benefit sharing programs.

4. POLICY IMPLEMENTATION

E&S aspects are managed across our operations under our Corporate Environmental and Social Management System (ESMS) through the following elements.

4.1. Leadership and Commitment

Our management is committed to strong E&S performance as a fundamental component of our business operations. It provides leadership, oversight, and the necessary resources to ensure the effective implementation and continuous improvement of the Corporate ESMS at both corporate and project level. This commitment extends across the entire organization and to our business partners, promoting awareness, responsible behaviour, and accountability. E&S performance is regularly monitored and reviewed to identify improvement opportunities and to strengthen our E&S culture, thereby contributing to the company's long-term success.

4.2. Risk and Impact Assessment

We believe that potential adverse environmental and social impacts can be prevented through the systematic identification and management of risks and impacts, applying the mitigation hierarchy proactively throughout the entire project lifecycle.

Risk and impact identification begins at the planning and development stage and is integrated into local Environmental Impact Assessments (EIA) and where necessary a broader Environmental and

Social Impact Assessments (ESIA), as well as applicable E&S related permits, approvals, and national-level regulatory requirements. All associated risks and impacts are identified and evaluated to define appropriate avoidance, prevention, mitigation, and control measures.

We ensure that the risk and impact assessment process is informed by the input of relevant internal and external stakeholders, including technical experts, workers, affected community members, and main equipment manufacturers and suppliers. This inclusive and systematic approach supports effective risk management, accountability, and the prevention of harm to workers, communities, and the environment.

4.3. Risk Management and Control

Based on the results of environmental and social risk and impact assessments, and applying the mitigation hierarchy with priority on avoidance, we develop and implement Environmental and Social Management Plans (ESMP) and other necessary topic-specific management plans based on risk significance and prioritization. These plans define procedures for proposed mitigation measures, roles and responsibilities, monitoring protocols and key performance indicators to be followed, training and competency requirements, communication processes, and non-conformity management.

Contractors and their subcontractors are required, through contractual clauses, to comply with these plans and perform the assigned mitigation actions as per their contractual scope of work during construction and operation phase. Implementation is supported by monitoring, audits, and preventive and corrective actions to ensure effectiveness, continual improvement, and consistent performance across all activities.


4.4. Review and Reporting

We review the E&S Policy at least every 24 months or whenever a significant change occurs. The Corporate ESMS is reviewed to assess its effectiveness with respect to defined adequate performance indicators (KPI) on a yearly basis. Relevant documentation is revised based on the annual review as well as other necessities. If any urgent revision is required to prevent a risk or comply with a new obligation, action is taken immediately.

We report E&S related information in full compliance with local legal requirements to the relevant authorities. Material environmental and social indicators regarding with climate change, biodiversity and ecosystems, pollution, resource use and circular economy and affected communities will be disclosed within the scope of our Environmental, Social & Governance (ESG) framework.

Revisions of this policy must be approved by management.

Effective date: 01.01.2026

Signed by:

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Björn Nullmeyer
Managing board / CFO
wpd GmbH

Version	Date	Originator	Review	Approval	Description
0	06.02.2023	ESG Team	International Finance	Managment	wpd AG: Environmental and Social Policy
1	31.05.2024	ESG Team	Construction LaPla HR	Managment	Change to wpd GmbH Update for implementation on Corporate level
2	01.01.2026	ESG & Sustainability Department	ESG & Sustainability Department	Managment	Review and change due to Human Rights Policy and Health and Safety Policy approval