

The logo for Greenvolt, featuring a stylized green and blue 'G' icon followed by the word 'greenvolt' in a lowercase, sans-serif font. The background of the entire page is a dark blue with a complex, white wireframe pattern that resembles a topographical map or a digital grid.

Shaped by nature

BIODIVERSITY POLICY

**Protecting biodiversity and preserving
ecosystems**

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1. Purpose

Greenvolt is a reference company on the Portuguese market and a recognised economic agent on the international renewable energies market, where it develops a strategy completely focused on renewable energies, based on three pillars: residual biomass, development of wind and solar utility-scale and distributed generation. Actively contributes to achieving sustainable development goals by creating beneficial and transformative outcomes on the planet through renewable electricity production, which implies generating positive climate impacts and favouring biodiversity and ecosystem services.

As part of both Sustainability and Biodiversity Strategies, Greenvolt is committed to protecting biodiversity and preserving ecosystems, being a priority into the Organisation's management processes, through the implementation of best practices to mitigate the negative impacts and to promote a positive impact on biodiversity and ecosystems.

Within the Biodiversity Strategy, Greenvolt will work to accelerate its positive impact, with the achievement of three main strategic objectives:

- ASSESS, to build credibility and transparency around biodiversity work.
- INTEGRATE, to build a "Nature Positive" business model, based on the mitigation hierarchy.
- EVOLVE, to act towards a positive transition for nature, climate and communities.

2. Objective

This Policy provides a reference framework for integrating the protection and promotion of biodiversity into the Greenvolt Group's activities and processes. It sets the principles for the development of a nature positive business model, such that its activities protect and promote the sustainable development and growth of natural capital.

Committed with the 2030 Agenda for Sustainable Development, Greenvolt Group's aims to ensure its contribution to progress on the United Nations Sustainable Development Goals (SDGs), especially goal 15 "Life on Land - Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss".

3. Scope

This Policy applies to all companies of the Greenvolt Group, within the limits established by law in each different country where Greenvolt operates.

This Policy is subject to disclosure to the Greenvolt Group, in compliance with the following rules:

- in the case of companies wholly controlled by Greenvolt, the respective management bodies must carry out the local transposition and the respective disclosure of this Policy;
- in the case of companies in which Greenvolt exercises control, co-control (Joint Ventures) or significant influence (associates), the representatives of Greenvolt attending in the management body shall, for the purpose of exercising control, co-control, or significant influence, promote the adoption of the necessary measures for local transposition and the respective dissemination of this Policy;
- in the case of companies in which Greenvolt does not exercise significant control or influence, Greenvolt representatives shall observe the provisions of this Policy in the performance of their respective functions and, to the extent possible, encourage the adoption of rules and procedures consistent with this Policy.

The same level of application is expected from our suppliers, contractors and their subcontractors.

4. Principles

To implement its commitment to biodiversity, the Greenvolt Group shall be guided by the following main principles, which apply to all its activities and businesses:

- i. identify, quantify and assess, on an ongoing basis and throughout the life cycle of the facilities and projects, the impacts, dependencies, risks and opportunities of the Group's activities on nature, with a value chain approach.
- ii. apply the principle of mitigation hierarchy (avoid, minimise, restore, and compensate as a last resort) in all activities and all the phases of infrastructure projects (including the projects design and planning).
- iii. avoid locating new infrastructure projects in spaces that are protected due to their ecological, biological, forest areas, cultural and/or landscape value or in classified areas for having high natural values.
- iv. implement specific biodiversity and ecosystem management plans for projects areas regarding their high natural values and operate towards "no net loss" or "net gain" of biodiversity in those areas, ensuring continuous monitoring.
- v. manage impacts, dependencies, risks and opportunities, giving priority to Nature-Based Solution.

- vi. ensure the use of sustainable residual biomass that complies with internationally recognized biomass-specific standards, regulations or a voluntary scheme that is at least compatible with the requirements of the EU RED II Directive.
- vii. integrate the management of natural capital and biodiversity into the Group's Environmental Management System (EMS), setting goals, indicators and standards for the control, monitoring and audit thereof.
- viii. account for and value natural capital, to support economic and ecological decision-making related to owned asset management.
- ix. promote biodiversity awareness and training for the Group's employees, as well as for subcontracted personnel and that of its suppliers, and for partners.
- x. engage local communities and other relevant stakeholders when addressing biodiversity issues and participate in leading renewable energy and sustainability associations and nature forums, with a positive profile for nature, advocating, learning and sharing in the global renewable energy policy arena for nature-related topics; and
- xi. report transparently on nature, specifically on impacts and dependencies and actions implemented on nature, including response to risks and impacts on nature, periodically publishing a biodiversity report.

5. Other related policies

- Code of Ethics and Conduct
- Sustainability Policy
- Sustainable Procurement Policy
- Supplier's Code of Conduct

6. Monitoring mechanisms

The Board of Directors is ultimately responsible for Greenvolt Group's impact on nature. Greenvolt Group ensures the necessary monitoring tools and mechanisms to incorporate the Biodiversity Policy principles into the overall decision process, as well as an organizational structure responsible for the achievement of these objectives and the implementation of the defined principles of action.

In this way, the following mechanisms can be used, among others:

- Manual and/or procedures that ensure the implementation of biodiversity principles in the Group;
- Specific indicators and/or action plans of different group companies, departments and/or business areas to ensure the development of a nature positive business model;

- Training and awareness programs related to protection and preservation of biodiversity directed to employees and/pr partners;
- Development of projects and initiatives, as determined by the Investment Social Policy, for management, conservation and preservation of biodiversity and ecosystems, involving local communities and/or other stakeholders.

Such mechanisms can be activated with the recurrence that may be deemed necessary.

7. Approval mechanisms

The Board of Directors establishes, promotes, and approves the principles on which this Biodiversity Policy is based, which must be accepted and implemented by the Directors and/or Managers in each specific Department and/or Area with the support of all employees, as a single team.

8. Review mechanisms

The Sustainability and Safety & Health Department, together with PV Development Department in Poland, are responsible for reviewing this Policy every two years, or whenever there are relevant changes to the applicable legal framework and the context of the activities carried out by the Greenvolt Group, presenting the proposed changes to the Board of Directors.

9. Final dispositions

Any request for clarification regarding this Policy may be addressed to the Sustainability and Safety & Health Department, via email sustainability@greenvolt.com.