



ENERGO-PRO

UN Global Compact
Communication on Progress
January to December 2021

Submitted July 19, 2022

Contents

| | |
|--|----|
| 1. Statement of Support by Petr Z. Milev, CEO and Member of the Board of Directors | 4 |
| 2. The UN Global Compact | 5 |
| 3. How we do business | 7 |
| 3.1. Our business | 7 |
| 3.2. Where we operate | 10 |
| 3.3. Organisational structure | 11 |
| 3.4. Governance | 12 |
| 4. ENERGO-PRO's Approach to sustainability | 19 |
| 4.1. Reporting | 20 |
| 4.2. ESG commitments | 20 |
| 4.3. Stakeholder engagement | 21 |
| 4.4. Materiality assessment | 22 |
| 5. Turkey | 24 |
| 5.1. Overview | 24 |
| 5.2. Materiality analysis | 25 |
| 5.3. 2021 Operations | 26 |
| 5.4. Environment | 27 |
| 5.5. Social | 31 |
| 6. Bulgaria | 36 |
| 6.1. Overview | 36 |
| 6.2. Materiality analysis | 36 |
| 6.3. Operations | 37 |
| 6.4. Environment | 38 |
| 6.5. Social | 42 |
| 7. Georgia | 48 |
| 7.1. Materiality analysis | 48 |
| 7.2. Operations | 49 |
| 7.3. Environment | 51 |
| 7.4. Social | 54 |
| 8. Czech Republic | 59 |
| 8.1. Overview | 59 |
| 8.2. Materiality analysis | 59 |
| 8.3. Governance | 60 |
| 8.4. Social | 62 |

- 9. Colombia 64
 - 9.1. Overview 64
 - 9.2. Materiality analysis 65
 - 9.3. Environment 65
 - 9.4. Social 71
- 10. Annex 73
 - 10.1. Data 73
 - 10.2. GRI Content Index 81

1. Statement of Support by Petr Z. Milev, CEO and Member of the Board of Directors



ENERGO-PRO a.s.
Na paří 1079/3a, Nové Město
110 00 Prague 1
Czech Republic

July 19, 2022

António Guterres
Secretary-General
United Nations
New York, NY 10017
USA

Dear Mr. Secretary-General,

I am pleased to confirm that Energo-Pro a.s. reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'P. Milev', is written over a light blue circular watermark.

Petr Z. Milev
CEO and Member of the Board of Directors
ENERGO - PRO a.s

2. The UN Global Compact

THE UN Global Compact requires companies to embrace a set of ten principles in the areas of human rights, labour, environment and anti-corruption. The principles are:

| |
|---|
| <p>Human Rights</p> <p>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and Principle 2: make sure that they are not complicit in human rights abuses.</p> <p>Labour</p> <p>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; Principle 4: the elimination of all forms of forced and compulsory labour; Principle 5: the effective abolition of child labour; and Principle 6: the elimination of discrimination in respect of employment and occupation.</p> <p>Environment</p> <p>Principle 7: Businesses should support a precautionary approach to environmental challenges; Principle 8: undertake initiatives to promote greater environmental responsibility; and Principle 9: encourage the development and diffusion of environmentally friendly technologies.</p> <p>Anti-Corruption</p> <p>Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery</p> |
|---|

ENERGO-PRO fully supports these principles which are specifically mentioned in our Sustainability Policy and are embedded in our overall approach to sustainability and Environmental, Social, Governance (ESG).

The table below summarizes efforts made by ENERGO-PRO to embrace the UN Global Compact Principles:

| Principle | Action |
|---|---|
| Human Rights | |
| Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; | Support is embedded in our new policies, including the Code of Conduct, Human Resource Policy, Human Right Policy, Procurement Policy, and Sustainability Policy. Our Code of Conduct specifically mentions our commitments to Human Rights. |
| Principle 2: make sure that they are not complicit in human rights abuses. | Same as above, in addition, in 2021 we adopted the Human Rights Compliance Acceptance (HRCA) tool applied during the selection process of security companies to ensure potential contractors are not involved in any human right violation cases. Our Security Policy makes reference to the HRCA due diligence process and training of security personnel on Human Rights. |
| Labour | |

| | |
|---|--|
| Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; | Support is in our Human Resources Policy. Some of our Business Units have collective bargaining agreements. |
| Principle 4: the elimination of all forms of forced and compulsory labour; | Statement included in our Human Resources Policy. We have not had any incident, complaint or whistle blower case regarding forced or compulsory labour. |
| Principle 5: the effective abolition of child labour; | Statement included in our Human Resources Policy. We have not had any incident, complaint or whistle blower case regarding child labour. |
| Principle 6: the elimination of discrimination in respect of employment and occupation. | Statement included in our Human Resources Policy. We have not had any incident, complaint or whistle blower case regarding discrimination in the workplace. |
| Environment | |
| Principle 7: Businesses should support a precautionary approach to environmental challenges; | We undertake analysis of impacts and risks, including the application of the mitigation hierarchy. We conduct surveys and have long term monitoring of biodiversity and environment (noise, air, water quality etc.) We make our commitment clear in our Sustainability Policy and ESG Policy and our Code of Conduct. |
| Principle 8: undertake initiatives to promote greater environmental responsibility; | These commitments are stated in our Sustainability Policy, ESG Policy and Code of Conduct. In addition our Procurement Policy requires compliance with our policies and Code of Conduct. Our Business Units actively undertake conservation initiatives and monitoring of biodiversity. |
| Principle 9: encourage the development and diffusion of environmentally friendly technologies. | Some of our Business Units have put in place environmentally friendly technologies. Refer to the Turkish case studies and Bulgaria case studies discussed in this report. |
| Anti Corruption | |
| Businesses should work against corruption in all its forms, including extortion and bribery | We have an Anti-Bribery and Anti Money Laundering Policy, a Whistle Blower Policy and our Code of Conduct requires commitment to these policies. We have no cases of material corruption, extortion and bribery. |

ENERGO-PRO joined the United Nations Global Compact in 2021 and this report represents our first annual Communication on Progress which is also part of our first Sustainability Report. Our Code of Conduct, values and policies align with the Global Compact's 10 Principles. We also commit to supporting the United Nations Sustainable Development Goals (SDGs) and have developed indicators aligned with the SDGs, we will establish targets in the near future. We support the following SDGs.



3. How we do business

3.1. Our business

ENERGO-PRO Group is a multinational energy group headquartered and established in 1994 in the Czech Republic. Hydropower is at the core of our business; we focus on generating electricity from hydropower plants and on the distribution and supply of electricity. Through hydropower, we strive to facilitate energy transition in Central and Eastern Europe and the neighbouring regions. In the countries where we operate, ENERGO-PRO has become a leading operator, developer, and supplier of hydropower.. We own, operate, and manage hydroelectric power plants and infrastructure networks for the distribution and supply of electricity (99% of electricity generated from hydropower).

The 2021 Sustainability report covers businesses of ENERGO – PRO a.s. (hereinafter “ENERGO-PRO” or “EPAS”) and its affiliated companies Murat Nehri Enerji Üretim A.Ş. (hereinafter “Murat Nehri”), BILSEV ENERJİ ÜRETİM VE TİCARET A.Ş. (hereinafter “Bilsev Enerji”) (all together hereinafter referred as “ENERGO-PRO Group” or “the Group”).

3.1.1 Strategy

ENERGO-PRO Group focuses on generating stable and predictable cash flows from electricity distribution and hydropower generation assets, as well as on selective expansion through attractively priced assets. We follow a strategy of international expansion by building up our asset base and developing it over the long term. Our business is conducted in a responsible way; we aim to sustain long-term stable growth while taking into consideration the needs of the communities and environment surrounding our business activities.

Following this strategy, the Group has grown exponentially during the past 25 years and turned into a strong player in the hydropower segment also focused on operation of hydropower plants above 100 megawatts (MW) of installed capacity. The Group continues to look for new investment opportunities in renewable energy, focusing on Central-Eastern Europe, the Black Sea region, and South America.

3.1.2 Mission

Our mission is to work in compliance with nature.

3.1.3 Values

- **Integrity:** We all share integrity as one of our priority values and abide by this while conducting professional and personal activities. We are consistent and lead by taking a stand for what we believe is right and complying with the law, this Code of Conduct, and corporate policies and standards.
- **Respect:** We respect each other, our partners, and our stakeholders. We work in a multicultural environment, and we create an atmosphere that enables all our staff to treat each other with respect.
- **Transparency:** We value transparency in all business undertakings, reporting and verbal communication.
- **Ethics:** We are committed to ethical standards in our professional and personal behaviour. We take responsibility and accountability for each of our individual actions and decisions, and we behave

professionally during our daily activities, whether it is dealing with our business partners or working in a sustainable manner.

3.1.4 Vision

Our long-term vision is to position ourselves as a leading renewable energy operator, distributor, and supplier of electricity in the countries where we operate, meeting energy demand and serving the needs of actively developing regions.

Over the last 25 years, ENERGO-PRO Group has gradually expanded into Central and Eastern Europe, the Black Sea region, and the Caucasus, with new expansion underway in Latin America. We currently operate 36 hydropower plants with a total installed capacity of 1,126 MW, where a gas turbine power plant offering grid support services with an installed capacity of 110 MW in Georgia complements our hydropower asset portfolio. Our commitment to bringing modern, green energy reliably and safely to people's homes underpins our activities and continues to shape our strategy.

3.1.5 Business model

We focus on three core activities: power generation, distribution and supply, and trading, which are highlighted below.

Figure 1: Group's core business activities

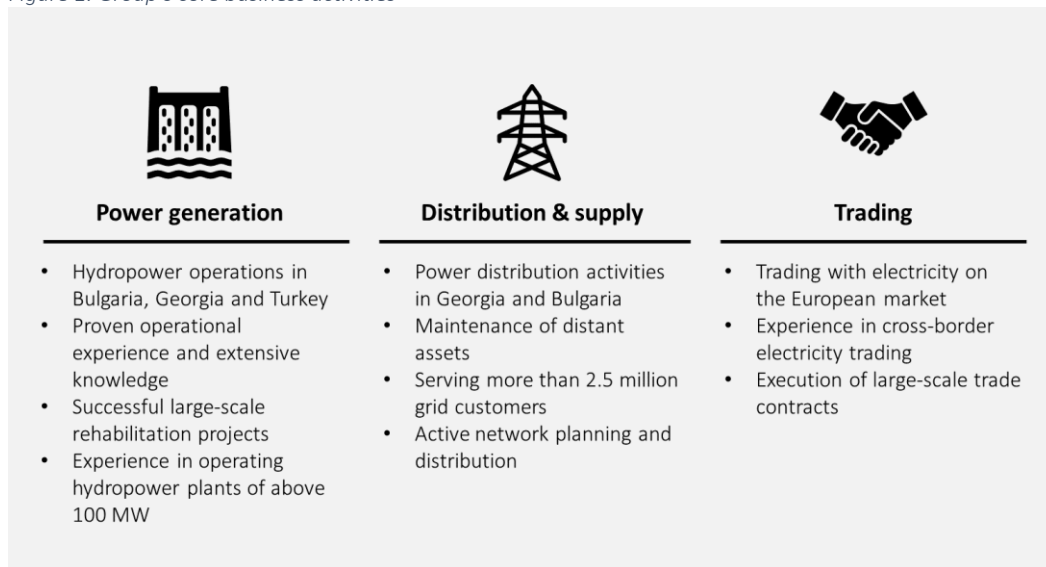
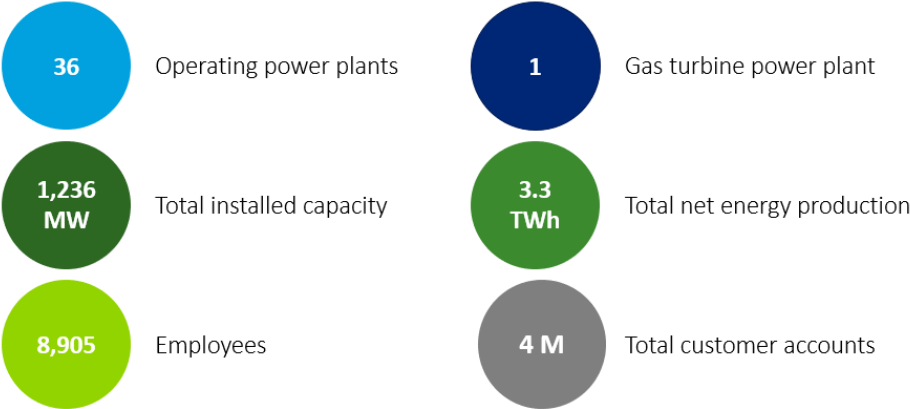


Figure 2: 2021 ENERGO-PRO Group highlights¹



¹ Total customer accounts include virtual meters.

3.2. Where we operate

ENERGO-PRO Group has grown its portfolio over the past 25 years through targeted acquisitions and greenfield development. The company has established a solid presence in Central and Eastern Europe, the Black Sea region, and the Caucasus, namely the Czech Republic, Bulgaria, Turkey, and Georgia. We have recently expanded to Colombia, where the construction of our hydropower plant Chorreritas, with an installed capacity of 20 MW, will soon begin.

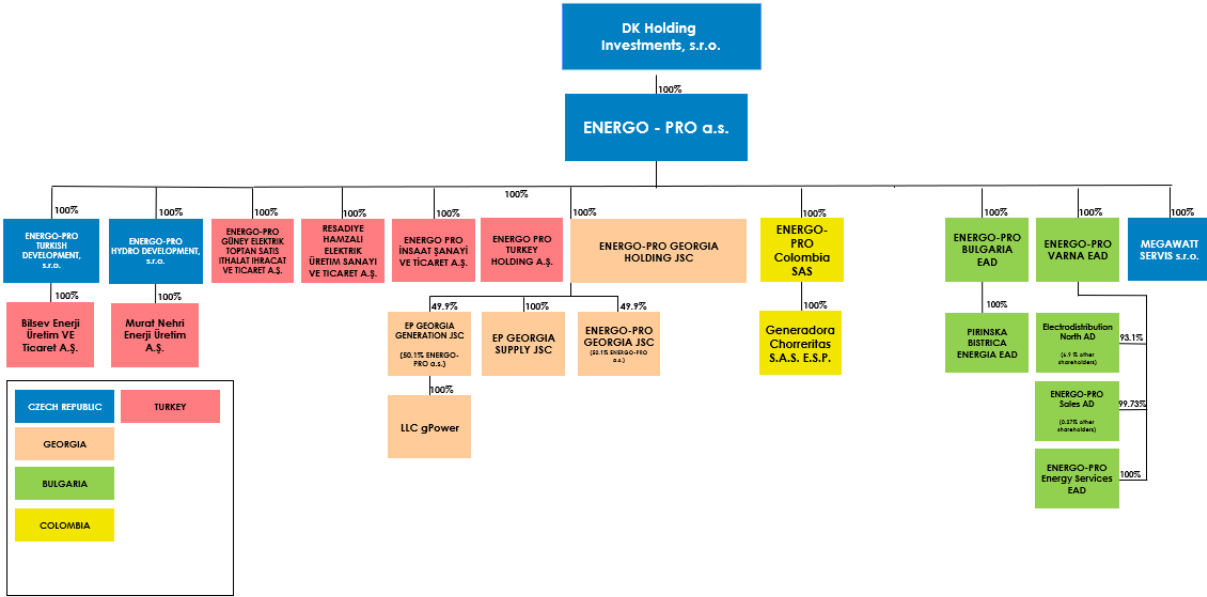
Figure 3: Countries where we operate



3.3. Organisational structure

The ENERGO-PRO Group is organised and managed based on territory markets in which it operates (Bulgaria, Georgia, Turkey, Colombia, Switzerland). The following Figure shows structure of ENERGO-PRO Group by entities::

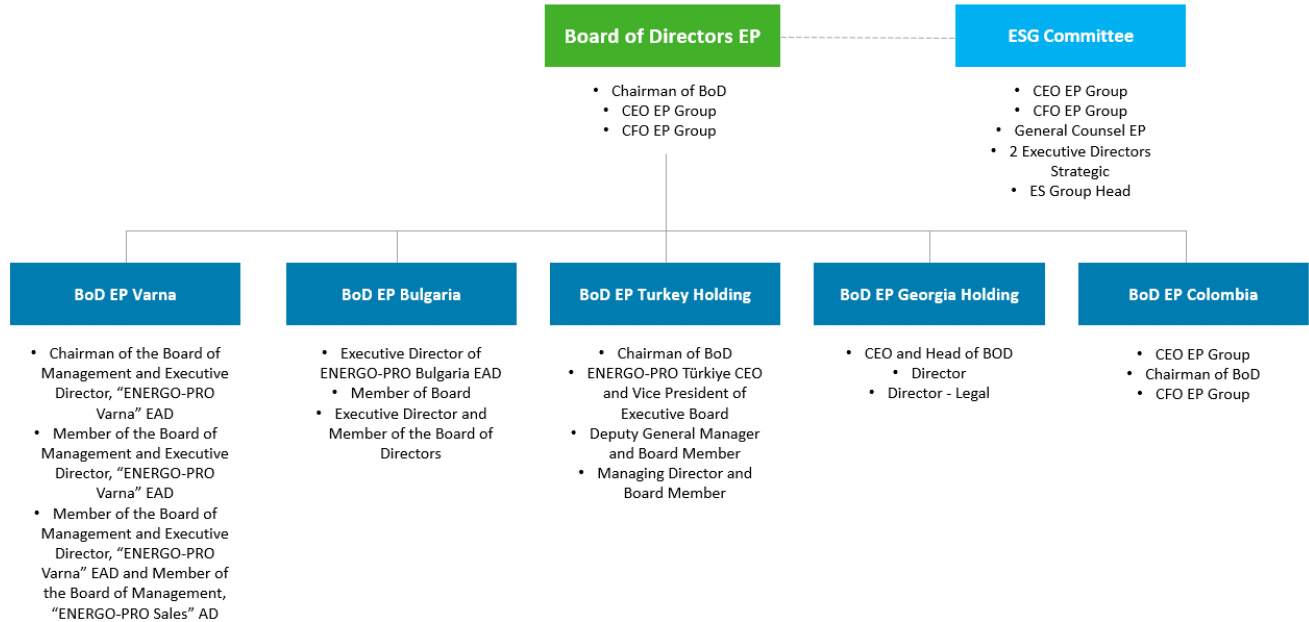
Figure 4: ENERGO-PRO Group structure



3.4. Governance

3.4.1 Governance structure

Figure 5: ENERGO-PRO Group governance structure of key business units



The BOD EP AS is Board of Directors of ENERGO – PRO a.s., ultimately accountable for Sustainability and ESG,, as per our policies and Code of Conduct. The ESG Committee, reporting to the BOD, drives ESG and all sustainability issues within the group. The Committee meets four times a year and their responsibilities are highlighted in the Group’s ESG Policy as well as below, which are:

- Reviewing and updating the Group policies
- Driving forward the integration of ESG in the business
- Ensuring KPIs are reported annually, and the data are accurate
- Ensuring the rollout of the Policies and that all employees understand the content of the Policy
- Ensuring all sites appoint senior ESG focal points
- Providing oversight to all issues concerning ESG and encouraging continuous improvement
- Identifying opportunities, risks and challenges and providing solutions to manage the challenges
- Working closely with the ESG rating providers
- Overseeing the preparation of the annual Sustainability Report

3.4.2 Legal compliance, ethics, and transparency

The Group conducts business with integrity and ethics in mind, while complying with all relevant laws. Our Group subsidiaries apply honesty and transparency when working with local governments, partners, and communities.

The Group follows the principles recognised by the Universal Declaration of Human Rights, the Voluntary Principles of Security and Human Rights, and the declaration of the International Labour Organization on Fundamental Principles and Rights at Work. Child and forced labour are strictly prohibited and condemned

by all business units. We also have zero tolerance for modern slavery, and we confirm that no incidents of modern slavery were reported or identified during our reporting years.

Global Code of Conduct

In 2021, a Code of Conduct was implemented within the Group. This Global Code of Conduct (hereinafter “the Code”) was developed to support staff in understanding our expectations for working in an ethical manner. This Code applies to all ENERGO-PRO Group employees, including temporary workers, directors, and executives. We also expect our contractors and consultants to abide by the Code while providing us with their services. Much of the content in the Code is detailed in ENERGO-PRO Group specific policies and standards, which were implemented in 2021. These policies and their objectives are highlighted below, and are also available on our website at <http://www.energo-pro.com/en/policies>.

Table 1: Overview of internal policies

| <i>Policy</i> | <i>Objectives</i> | <i>Management</i> |
|--|---|---|
| <i>Anti-Bribery and Anti-Money Laundering Policy</i> | <ul style="list-style-type: none"> • Ensure that all employees and associated persons act lawfully and with integrity when performing their work • Contribute to the development of integrity among all employees and associated persons • Enhance the Group's reputation and its relationships with third parties, both public and private • Define bribery and how to avoid it, and enable the detection and treatment of bribery • Define how to recognise and deal with money laundering | <ul style="list-style-type: none"> • An anti-bribery and anti-money laundering committee will be responsible for the introduction and overall implementation of the Policy, including the supervision of training activities and the review of reports of internal investigations into alleged irregularities. • The Committee has three members: one member of the Board of Directors, the Group head of the Human Resources Department (“HHR”), and the Group general counsel (“GC”). |
| <i>ESG Policy</i> | <ul style="list-style-type: none"> • Respect and demonstrate Good International Industry Practice (GIIP) regarding ESG • Provide a framework for ESG reporting. • Contribute positively to our brand image • Contribute to environmental, social, and good governance continuous improvement • Enable ENERGO-PRO to access funds, including green bonds, from financial partners requiring ESG and Sustainability reporting | <ul style="list-style-type: none"> • An ESG Committee has been established to manage ESG. Members of this committee include the Chief Executive Officer, 2 Strategic Development Executive Directors, the Group General Counsel, the Chief Financial Officer, and the ES Group Head. |
| <i>Health and Safety Policy</i> | <ul style="list-style-type: none"> • Maintain and improve health and safety in the workplace for employees, contractors, and visitors | <ul style="list-style-type: none"> • Responsibility of the HR Department and the Health and Safety Department of each BU. |

Human Resources Policy

- Protect the health and safety of the communities impacted by operations.
- Provide direction and build management and employee accountability
- Build a health and safety culture in all sites and offices and remove or minimise the risks to the health, safety, and welfare of all employees, contractors, and visitors, and anyone else who may be affected by our business operations

- Ensure all employees are treated fairly and equally
- Foster cooperation and communication among each other
- Ensure any form of discrimination, harassment, or abuse is not tolerated
- Included employees in decisions that affect their work and their careers
- Encourage growth and development of employees by helping them achieve their professional goals at the organisation and beyond

- Responsibility of the **HR Department**.

Procurement Policy

- Identify and manage risks associated with suppliers
- Maximize transparency and effectiveness of our Supply Chain
- Ensure that the actions of suppliers are aligned with our Global Code of Conduct and policies, particularly regarding biodiversity, human rights, labour, anti-corruption and bribery, stakeholder engagement, our commitments to acting on climate change, child labour, diversity and inclusion in the workforce, occupational health and safety, ESG reporting, and good governance
- Maximize local procurement and local employment

- Responsibility of the Central Purchasing Department.

Security Policy

- Provide a secure working environment for all employees, contractors, sub-contractors, and visitors as well as the integrity of operations, facilities, and assets.
- Establish a relationship based on trust, mutual respect, and integrity with the communities and local authorities
- Respect and demonstrate Good International Industry Practice (GIIP) regarding human rights and security
- **In country Senior Management** is responsible for ensuring that all offices and operations/projects are secure and that suitably qualified staff have been assigned to manage security.
- All construction/operation sites are required to have construction/operations Security Management Plans, security risk assessments, security incident reporting, and management and evacuation plans.

Sustainability Policy

- Apply sustainability best management practices in the planning, design, construction, and operation of our activities
- Recognise the responsibility of contractors and their business activities to respect human rights as an integral part of sustainability
- Respect local cultures, customs, and values in our dealings with employees, communities, and other stakeholders
- Meet applicable international standards for maximizing energy efficiency and minimizing the production of wastes and the release of pollutants, greenhouse gas emissions, or other drivers of climate change
- Aim to minimize and mitigate adverse environmental impacts in accordance with internationally recognised business best practice and local legislation
- Protect local biodiversity with an emphasis on high-value resources and ecosystems and on applying the “no net loss” principle of biodiversity or of priority ecosystem services
- Responsibility of the ESG Committee.

Whistle-blower Policy

- Comply with laws on whistle blower protection
- Protect people who report breaches (meaning possible illegal activities or other
- The Whistle Blower Policy Designated Person is the Environmental and Social Group Head.

| | | |
|--|---|---|
| <p><i>Data Protection Policy (Internal and External)</i></p> | <p>material wrongdoing, as described above) which they have learned about in connection with their work</p> <ul style="list-style-type: none"> • Prevent retaliation against whistle blowers • Protect personal data (Internal) • Ensure that staff understand the rules governing their use of personal data to which they have access in the course of their work (Internal) • Communicate who we are and how and why we collect, store, use, and share personal data (External) • Explain individual rights in relation to personal data and how to contact us or supervisory authorities in case of complaint (External) | <ul style="list-style-type: none"> • If any Group company has an Internal Audit Division, the WBDP will be the head of such Internal Audit Division. • Responsibility of the Group General Counsel. • The Data Protection Officer (DPO) is responsible for overseeing any significant new data processing activities and ensures that all relevant compliance steps are addressed. |
| <p><i>Human Rights Policy</i></p> | <ul style="list-style-type: none"> • Respect and demonstrate Good International Industry Practice (GIIP) regarding human rights • Provide a framework for embedding the responsibility to respect human rights throughout the organisation • Build leadership accountability • Demonstrate to our partners and stakeholders our commitment to respecting human rights and build trust | <ul style="list-style-type: none"> • Responsibility of the ESG Committee. |

Figure 6: Whistle-blower case in Turkey

Turkey whistle-blower case thoroughly investigated and successfully resolved

In 2021, one case of suspected corruption was reported in Turkey. The Head of the Environmental and Social Group responsible for resolving and investigating reports of suspected policy breaches or ethical misconduct responded promptly to the case and ensured that it was investigated with due diligence. With the help of lawyers, it was revealed that the case did not involve corruption but rather highlighted poor internal management practices.

3.4.3 Supply chain

We believe that suppliers play a key role in the success of our business and our sustainability commitments, which is why all country operations are required to develop Procurement Procedures that are aligned with our Global Code of Conduct and policies. These procedures describe the expected procurement process and provide a transparent approach to selecting suppliers. Our detailed purchasing processes are defined and described in our Internal Purchasing Instruction document.

Figure 7: Overview of the Group's supply chain

| | Turkey | Bulgaria EAD | Bulgaria Varna | Colombia | Georgia |
|---|--|---|--|--|---|
| <i>Types of suppliers engaged</i> | Construction contractors, electricity, biodiversity/ESIA, transfer services, health services, education services, HSE services, rental services, security services, maintenance services, general supplies | Design services, manufacture, supply and commissioning services, electricity trading, construction services, HSE services, rental services, maintenance services, purchase goods, IT services | Electricity, maintenance and repair services, construction contractors, postage and mass printing services, transfer services (SLA), consulting services; IT and telecommunication, insurance, job safety services, education services, rental services, security services, general supplies (fuel, working clothes, tools, office materials, subscriptions, etc.) | Environmental consultants, legal, accounting, engineering, administration including office supplies and operations | Construction works, electrical installations, high voltage networks, low voltage networks, materials to be manufactured, materials to be purchased, services, foreign suppliers for materials, biodiversity consultants |
| <i>Total no. of suppliers engaged</i> | 565 (managed by a procurement software) | Approximately 133 | 2,227 (managed by SAP procurement and SAP FI software) | 40 | 231 |
| <i>Location of suppliers</i> | 70% from Ankara and 30% regional from facility locations | 85% from Sofia and 15% regional from all over the country. 95 % from Bulgaria and 5 % from EU countries. | 97% of the suppliers are from Bulgaria (16 % of them are from Sofia, 15% of the from Varna). | 2.5% from Bogota (national) and the 97.5% from Medellin (regional) | Approximately 57% from Tbilisi, the rest regional |
| <i>Estimated value of supplied goods and services in 2021</i> | Roughly 50 million US\$ | 21,674,000 EUR | 994,795 TEUR | Roughly 650,000 US\$ | 30,000,000 EUR |

* The volume of suppliers is very small in the Czech Republic, and it is difficult for Czechia to get this information since it is often combined with other business units. Therefore, suppliers to ENEGO-PRO in the Czech Republic are not included in the overview above.

No significant change to the supply chain occurred in 2021 across all business units.

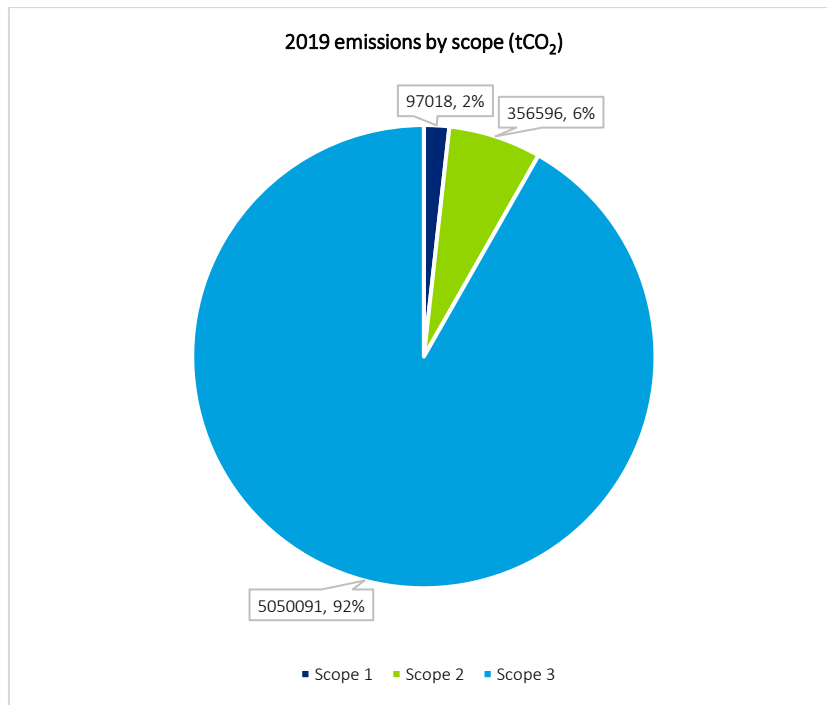
3.4.4 Approach to greenhouse gas emissions

Reflecting on our climate change commitments, we commissioned a Climate Change assignment in 2021/2022 consisting of three main deliverables: a GHG inventory using the globally recognised GHG Protocol, establishment of targets, and the elaboration of a Climate Change Decarbonization Road Map. Our intent is to submit the established targets to the Science Based Targets Initiative (SBTi). We therefore used the GHG Protocol consistent with the SBTi. This was our first GHG inventory exercise aimed at setting the basis for a climate change framework consistent with the EU Green Deal and Paris Agreement. To set

an appropriate baseline for the GHG inventory prior to the start of the Covid-19 pandemic, 2019 was selected as the baseline year. We will continue to conduct GHG inventories on an annual basis.

The report revealed that Scope 3 represents 92% of ENERGO-PRO's total carbon footprint. Energy-related activities, covering additional traded electricity in Bulgaria and Georgia, make up the majority of this scope. Scope 1 emissions make up 2% of our total footprint and originate primarily from our thermal power plant in Georgia. Biogenic emissions also occur at our HPPs in Turkey, Georgia, and Bulgaria, but these are not critical hot spot areas. Lastly, Scope 2 emissions contribute to 6% of the total footprint and are mainly associated with electricity distribution losses in Georgia and Bulgaria.

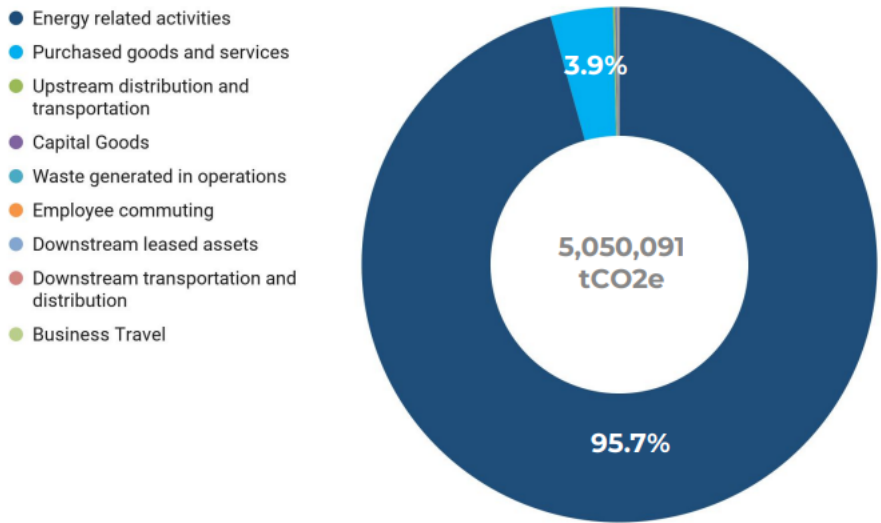
Graph 1: 2019 GHG emissions by scope



Our overall emissions intensity related to electricity generation is equal to 33.8 gCO₂e / kWh. The emissions intensity related to electricity supply/distribution is 458.188 gCO₂e / kWh (using a market-based accounting approach).

Because 92% of our GHG footprint consists of Scope 3 emissions, our aim is to choose suppliers with a proven commitment to environmental management and climate change mitigation. We determined that emissions in this scope are predominantly from energy-related activities covering mainly “traded electricity,” while purchased goods and services account for 4% of the total Scope 3 emissions. Other categories have negligible contributions. However, we have limited influence concerning traded electricity, our main source of GHG emissions, due to market regulations. The Decarbonization Road Map provides recommendations on how to further address these emissions within our supply chain, and we plan to act on those recommendations. In addition, we would like to focus on tracking the source of purchased electricity for our trading activities and identifying the energy sources used by suppliers to generate our purchased electricity.

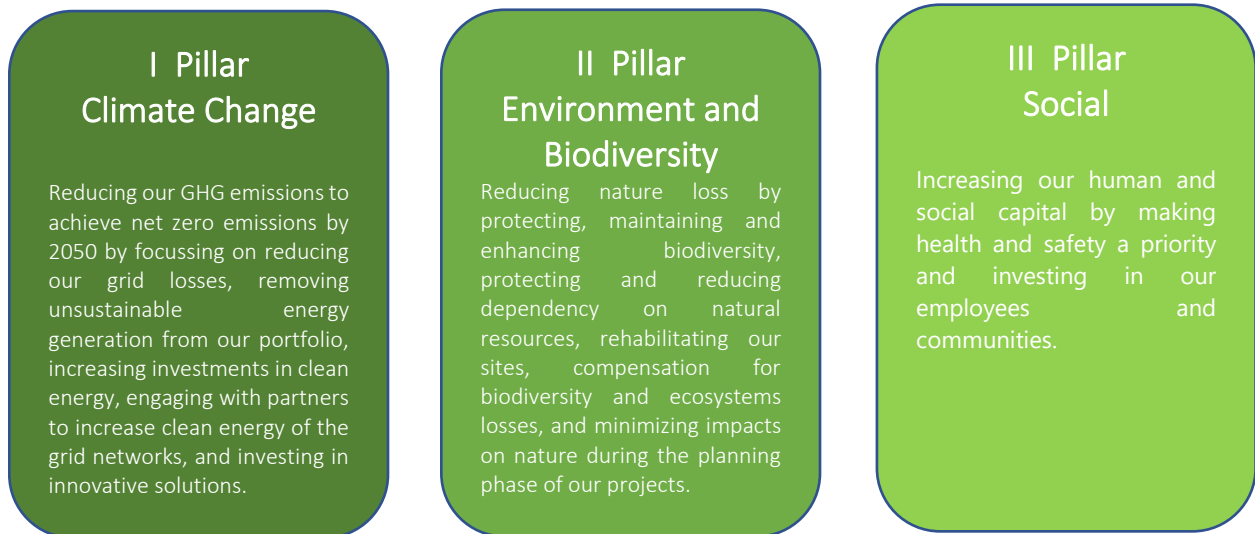
Figure 88: 2019 Scope 3 emissions breakdown



4. ENERGO-PRO’s Approach to sustainability

This is ENERGO-PRO’s first Sustainability Report and in this report we aim to present our Sustainability and ESG approach, better communicate our activities and future commitments and describe our pathways to meet our commitments.

In 2021, we adopted new group policies including a Sustainability Policy and ESG Policy with clear objectives and commitments². Within these policies, we highlight our sustainability strategy which includes three interconnected pillars and key priorities:



² The EP Sustainable policy is available on our website: www.energo-pro.com/files/policies/SustainabilityPolicy/SustainabilityPolicy_EN_finalversion.pdf.

We understand that we will need to continue evolving our strategy to align with new requirements and emerging challenges so we can continue growing our business and delivering green energy that improves people’s lives.

4.1. Reporting

This Report has been prepared in accordance with the GRI Standards: Core option³. We applied GRI’s reporting principles of content and quality when drafting this Report. GRI standards ensure the quality of the Report and facilitate the standardisation of information that is important for the comparability of ESG performance. Additionally, EP is a signatory of UN Global Compact and aligns with the UN 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals, as further highlighted within this chapter.

This Report covers the period from January 1st, 2021 to December 31st, 2021, except where otherwise noted. For the purposes of highlighting trends and drawing conclusions, comparative data for the last two calendar years have also been provided within this Report (2019 to 2021). The report was prepared by an internal team of experts led by our ESG officer. More information about our approach to data collection can be found in the Annex of this Report. The Report has not been subject to external assurance.

4.1.1 Report structure and boundaries

We follow the structure of our financial reports, where we present individual countries and their respective business units (“Bus”). However, financial indicators do not fall within the boundary of this Report, instead they cover the information for the entirety of ENERGO-PRO a.s. s.[, Murat Nehri and Bilsev Enerji.] The content of the Report is based on material topics specific to each BU. This approach to the Report’s structure was chosen to make it comprehensive and easy to follow. Quantitative and qualitative information such as supporting explanations, infographics, and case studies accompany the narrative throughout the text. The [Annex](#) includes additional information for better understanding, including methodology notes, data tables, and the GRI Content Index. The process for defining Report content, data gathering, drafting, and dissemination is summarised in the table below.

Table 2: Four steps of reporting process.

| Steps | Objectives |
|----------------------------------|---|
| Definition and contextualisation | Identifying key stakeholders and their expectations Defining reporting boundaries Defining material topics |
| Data gathering | Defining data scope and limitations Data collection (quantitative and qualitative) Data controlling and consolidation |
| Report drafting | Defining report structure Drafting Graphic design and data visualisation |
| Dissemination | Publishing Internal and external communication |

4.2. ESG commitments

³ We use 2016 GRI Standards, with 2018 revisions where applicable.







4.2.1 UN Global Compact

Since 2021, ENERGO-PRO has been committed to the UN Global Compact. We demonstrate our commitment to the UN Global Compact principles by integrating them into our Sustainability Policy.

4.2.2 Sustainable Development Goals

Our focus on the SDGs and their supporting targets highlights the Group’s support of the principles embedded in the UN’s document titled *“Transforming our world: the 2030 Agenda for Sustainable Development.”* We understand the impact of aligning with these goals and have therefore identified those most material to our operations and business activities, as highlighted below.

Table 3: SDGs material to EP operations.

| Material UN SDGs | EP’s areas of action |
|--|---|
|  <p>7 AFFORDABLE AND CLEAN ENERGY</p> | <ul style="list-style-type: none"> - Invest in and promote initiatives relating to clean and renewable energy - Continually work to improve energy efficiency |
|  <p>8 DECENT WORK AND ECONOMIC GROWTH</p> | <ul style="list-style-type: none"> - Provide fair employment, safe working conditions, and further invest in talent - Include provisions within the Group’s policies for improving inclusive economic growth |
|  <p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p> | <ul style="list-style-type: none"> - Establish procedures that will enforce sustainable consumption and production - Promote the use of reusable products |
|  <p>13 CLIMATE ACTION</p> | <ul style="list-style-type: none"> - Conduct climate change and natural hazard risk assessments (including mitigations) - Prepare for low carbon transition through decarbonization strategy by setting GHG reduction targets in line with the goals of the Paris Agreement |
|  <p>15 LIFE ON LAND</p> | <ul style="list-style-type: none"> - Implement mitigation and management plans at all sites that have an impact on natural habitats - Incorporate biodiversity measures into internal policies (Sustainability Policy) |
|  <p>16 PEACE, JUSTICE AND STRONG INSTITUTIONS</p> | <ul style="list-style-type: none"> - Implement policies across the Group and our supply chain that address good governance (ex. anti-bribery and whistleblower), and protect human and labour rights - Uphold legal and regulatory compliance across the Group - Implement corporate transparency into the Group’s core values |

Furthermore, EP business activities also contribute to SDGs such as SDG 1 – No Poverty, SDG 3 - Good Health and Well-being, SDG 5 – Gender Equality, and SDG 10 – Reduced Inequalities.

4.3. Stakeholder engagement

Our stakeholders are those with an impact on our business activities or those who are influenced by our business activities. For the purposes of drafting this Report, we conducted an internal analysis of our stakeholders and addressed our understanding of their expectations. The analysis included an assessment of material topics linked to our understanding of stakeholder expectations and how these expectations

influence their decision-making processes. Conclusions were drawn based on the inputs from individual BU representatives for the countries presented within this Report, which is summarised in the table below. The frequency and robustness of our stakeholder engagement depends on external conditions and context, risks and impacts and phase of the project, including our means of communication and the occurrence of unexpected events.

Table 4: Internal stakeholder analysis results.

| Stakeholder group | Communication or engagement channels | Key topics and concerns raised |
|----------------------------------|---|--|
| Customers | ESG report, social media channels, press release, website, whistle-blower channels, customer department, direct contact | Reliable and affordable access to basic services, Regulatory compliance, |
| Employees | ESG report, social media channels, press release, website, whistle-blower channels, trainings | Health & safety, Employee development |
| Trade unions | ESG report, social media channels, press release, website, whistle-blower channels | Employee development, Health & safety, Operational security |
| General public | ESG report, social media channels, press release, website, whistle-blower channels | Biodiversity and land use, Health & safety, Water management, Waste management, Community investment, Resettlement, ESIA consultation |
| Local communities | ESG report, social media channels, press release, website, whistle-blower channels | Biodiversity and land use, Health & safety, Community investment, Resettlement, Project information and update, Employment, ESIA consultation, General engagement |
| Investors and shareholders | Annual report, ESG report, social media channels, press release, website, direct contact | Regulatory compliance, Operational security, Tax transparency, Relevant GIIP compliance |
| Government and local authorities | Annual report, ESG report, direct contact | Reliable and affordable access to basic services, Relations with local communities, Regulatory compliance, Social and environmental assessment of new projects, Operational security, Tax transparency, Community investment, Consultation, Biodiversity partnership |
| Suppliers | Annual report, ESG report, social media channels, press release, website, whistle-blower channels, direct contact, training | Fair and ethical business practices, Regulatory compliance, Health & safety |

4.4. Materiality assessment

Material topics have been identified as those that are connected to our business activities and that have an actual or potential impact on people or the environment. The scope of material topics considers our stakeholders as well as our value chain. The materiality assessment process that was used to compile this Report is presented in the diagram below.

Figure 9: EP materiality assessment process



In this Report, we use radar charts to identify material topics for each of the Group’s BUs (segmented by country within this Report). We believe that this approach can improve ESG management and decision-making on a BU level, as impacts are not only linked to business activities, but also to the locations in which they occur.

Table 5: All topics identified as material to EP with a distribution between business units.

| Material topics⁴ | Turkey | Bulgaria | Georgia | Czech Republic | Colombia |
|---|---------------|-----------------|----------------|-----------------------|-----------------|
| Climate change mitigation | | | | | |
| Water management | ✓ | ✓ | ✓ | | ✓ |
| Waste management | ✓ | | | | ✓ |
| Biodiversity and land use | ✓ | ✓ | ✓ | | ✓ |
| Health & safety | ✓ | ✓ | ✓ | ✓ | ✓ |
| Employee development | ✓ | ✓ | ✓ | ✓ | ✓ |
| Relations with local communities | ✓ | ✓ | ✓ | | ✓ |
| Reliable and affordable access to basic services | ✓ | ✓ | ✓ | | |
| Social investments or philanthropy | | | | | |
| Fair and ethical business practices | | | | ✓ | |
| Regulatory compliance | ✓ | ✓ | ✓ | ✓ | ✓ |
| Social and environmental assessment of new projects | ✓ | ✓ | ✓ | ✓ | ✓ |
| Internal policies and certifications | | | | | |
| Responsible procurement | | | | | |
| Operational security | ✓ | ✓ | ✓ | | |
| Energy management | | | | | |
| Electricity prices | | | | | |
| Technology innovations | | | | | |
| Tax transparency | | | | ✓ | |

⁴ ENERGO PRO considers all material topics within our business activities, independent of their priority level, presented in the EP material analysis.

5. Turkey

5.1. Overview

Since commissioning its first hydropower plant in 2008, ENERGO-PRO Turkey has come a long way. To strengthen our core business and further expand the supply of electricity from renewable energy sources, we have been investing heavily into hydropower development in recent years and it constructed two greenfield investments Karakurt Dam and HPP (97 MW) and the Alpaslan 2 Dam and HPP (280 MW) which are operated by an affiliated companies Bilsev Enerji and Murat Nehri. , both hydropower plants were commissioned in 2020. The Group acquired full ownership of the Karakurt Dam and HPP and the Alpaslan 2 Dam and HPP in 2021. During 2020, these new projects generated 808 GWh of electricity.

Figure 10: ENERGO-PRO Turkey structure



5.1.1 Greenfield projects

The year 2020 marked a strategic milestone for the ENERGO-PRO Group as it commissioned first units in two Turkish energy companies, Bilsev Enerji Uretim ve Ticaret A.Ş. and Murat Nehri Enerji Uretim A.Ş., owning Karakurt Dam and HPP and Alpaslan 2 Dam and HPP, respectively. By investing in the construction of the two HPPs, the total installed capacity of ENERGO-PRO's HPPs in Turkey increased fourfold, from 94 MW to 470 MW.

The Alpaslan 2 Dam & HPP represents a profoundly important energy investment since it is the ninth largest privately-owned dam in Turkey and is expected to contribute significantly to the economic development of the region. The Alpaslan 2 Dam will irrigate an area of up to 78.5 ha and generate 700 GWh of renewable electricity annually. It will also procure municipal water.

With an installed capacity of 280 MW, Alpaslan 2 Dam and HPP is the largest hydropower plant in the ENERGO-PRO Group's portfolio. Alpaslan 2 HPP generated 15 GWh of electricity (2020) and 609 GWh (2021).

Murat Nehri was acquired in 2017 by ENERGO-PRO Hydro Development s.r.o. (an affiliated company to ENERGO - PRO a.s.) as under construction project and since then has been developed by the ENERGO-PRO Group on a build, own and operate (BOO) model. The last (fourth) unit was fully commissioned in March 2021. The electricity generation licence obtained in 2010 is valid for 49 years, until September 2059.

The Karakurt dam and HPP project was developed by Bilsev Enerji, which is an affiliated company to ENERGO-PRO a.s. The company was acquired by ENERGO-PRO Group in 2011. Karakurt Dam and HEPP project is on Aras River, within the borders of Kars Province. The construction phase took four years 2017-2020 and the last (third) unit was commissioned in December 2020. The electricity generation licence obtained in 2011 is valid for 49 years, until February 2060.

Figure 11: Operations of acquired companies

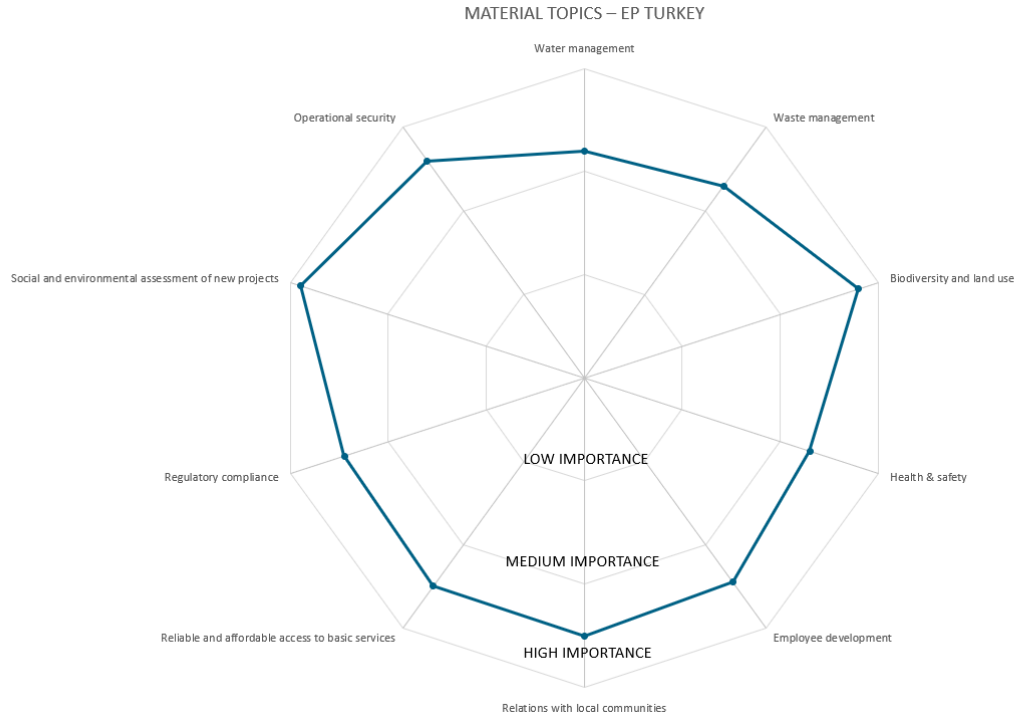
| Generation and HPP - Acquisition in 2011 | | |
|---|--------------------------------|------------------------|
| BILSEV ENERJI ÜRETİM VE TİCARET A.Ş. | | |
| <i>HPP</i> | <i>Installed capacity (MW)</i> | <i>Commissioned in</i> |
| Karakurt Dam and HPP | 96.99 | 2020 |

| Generation and HPP - Acquisition in 2011 | | |
|---|--------------------------------|------------------------|
| Murat Nehri Enerji Üretim A.Ş. | | |
| <i>HPP</i> | <i>Installed capacity (MW)</i> | <i>Commissioned in</i> |
| Alpaslan 2 Dam and HPP | 280 | 2020 |

5.2. Materiality analysis

Among the measures ENERGO-PRO Turkey has taken to address its material topics are the those implemented to ensure that our recent construction and investment activities, as well as our heavy focus on hydropower generation, support the sustainable growth of the Group. This year, we have focused on risks related to biodiversity, water and waste management, health and safety, and relations with local communities. Operational security is particularly important to us; as an energy provider, ensuring reliable access to our services is crucial. Given our heavy focus on two big construction projects in recent years, setting high standards for social and environmental assessment of new project has been imperative.

Figure 12: Turkey material matrix



5.3. 2021 Operations



Operating power plants



Total installed capacity



Total net energy production

Electricity generation

Electricity generation from the hydropower plants decreased significantly in 2021 compared to the previous year due to unfavourable weather conditions. The generation of electricity from hydropower was down 38.4 % compared to the previous year due to low precipitation, decreasing from 488 GWh to 301 GWh. The plants owned by Reşadiye Hamzalı are run-of-river type hydropower plants whose production therefore depends on the climate. 2021 was the driest year in two decades in Turkey, with arid years occurring approximately one in every 7 years on average. Arid years are likely to occur more frequently in the future due to climate change, and we will have to prepare for and communicate on this matter with relevant stakeholders. Projections for the upcoming year are more optimistic, with the electricity production expected to increase. The plants owned by Murat Nehri and Bilsev Enerji have large hydroelectric reservoirs, meaning they are less dependent on climate as their large storage capacity makes it possible to estimate energy production for the following year. Since the Alpaslan 2 and Karakurt Dams and HPPs were

commissioned by the end of 2020, it was impossible to collect sufficient water within 2021 to generate substantial power.

Figure 13: Overview of ENERGO-PRO Turkey HPPs in operation

| Generation and HPP | | | |
|--|--------------------------------|------------------------|--|
| RESADIYE HAMZALI ELEKTRİK ÜRETİM SANAYİ VE TİCARET A.Ş. | | | |
| <i>HPP</i> | <i>Installed capacity (MW)</i> | <i>Commissioned in</i> | |
| Reşadiye 1 HPP | 16 | 2010 | |
| Reşadiye 2 HPP | 26,7 | 2010 | |
| Reşadiye 3 HPP | 22,9 | 2009 | |
| Hamzalı HPP | 16,7 | 2008 | |
| Aralık HPP | 12,4 | 2010 | |

5.4. Environment

5.4.1 Water use

Water is a key resource for ENERGO-PRO Group in Turkey. We strive for environmentally sustainable management of water resources in our operations. This means working to improve the efficiency of water use, minimizing impacts on aquatic ecosystems, and regulating hydropower dams to balance low flows and reduce flooding.

We engage our stakeholders to reduce water use and, when possible, recycle water to reduce the total amount of fresh water used. For example, we have prepared a water saving training which will be provided to employees and people living near our sites. As the Sustainability and ESG Policies include requirements to reduce water use, we are implementing measures to reduce water use across our business units. A baseline for monitoring water use is currently being developed.

Water withdrawal at ENERGO-PRO Group’s sites in Turkey amounted to more than 88 thousand m³. Since the volume of discharged water contains a value for the volume of water that passes through a hydroelectric power plant, it is currently impossible to report on water consumption, and we are implementing processes to monitor water consumption more accurately. However, most of the water used to generate power is returned to river streams. To prevent water pollution, a sewage treatment plant has been built at Alpaslan 2 Dam in line with national regulation to purify used water before releasing it into the river. Sewage treatment plants or septic tanks are used at all our HPPs during construction and operations, depending on the number of employees.

5.4.2 Waste management

ENERGO-PRO Turkey is not a large-scale generator of hazardous waste; hazardous waste constituted roughly 4% of all the waste produced in power generation facilities – only 11.5 tons of hazardous waste compared to 290 tons of non-hazardous waste produced. The hazardous waste, including contaminated packages, filters, batteries, and dangerous organics, is stored safely at our site. Our companies employ waste management practices that minimize overall waste products and maximize recycling and reuse opportunities. Out of the 290 tons of non-hazardous waste generated, 100% was recycled. All waste,

whether hazardous or non-hazardous, is handed over to companies accredited by the government, eliminating the waste in accordance with our EIA responsibilities. Our team monitors and records the waste disposal process.

5.4.3 Biodiversity and Natural Resources

ENERGO-PRO Group in Turkey does not operate in regions with high levels of water stress, e.g., risk of droughts, or in any protected areas. Nevertheless, given our aim to work in compliance with nature, we take a pro-active approach to limiting our biodiversity impacts. For impacts that cannot be fully avoided or mitigated, compensation measures are often considered in discussions with authorities and other stakeholders.

A responsible approach to biodiversity management is important to reduce our impact, gain acceptance from local communities, reduce permitting obstacles, and lower the risk of projects being delayed. To manage these processes at Alpaslan 2, we have implemented a robust environmental, social, health, and safety management system (ESHS - MS) that enables us to reduce our environmental impacts efficiently and cost-effectively. Our ESHS is externally audited by Mott McDonald Company and employs a team of experts providing professional guidance to ensure credibility and transparency. ENERGO-PRO Group has also implemented comprehensive environmental commitments within our ESG and Sustainability Policies that guide all our actions and operations.

Our biodiversity protection measures centre on land and water body rehabilitation projects. Particular attention was given to the environmental management of the Alpaslan 2 project due to its enormous scale and lender requirements to meet International Finance Corporation (IFC) Environmental and Social Sustainability Policy.



In compliance with nature

We place biodiversity protection as one of our main priorities. Therefore, a comprehensive biodiversity programme has been developed for **the Alpaslan 2 project**, the biggest executed project so far in ENERGO-PRO's history, in collaboration with international and national specialists and the Government of Turkey. Some of the initiatives implemented to date to protect and enhance biodiversity at the Alpaslan 2 site and adjacent areas include:

Stakeholder engagement

We extensively communicate with local communities and authorities about biodiversity protection. A number of booklets and brochures describing regional fauna and flora and reinforcing the importance of preserving biodiversity were prepared and distributed to local schools and authorities. This process will also continue throughout the operations phase. To further raise awareness about biodiversity, a nature observatory will be built near the dam area to educate about the endemic species living there.

Rehabilitation

Rehabilitation and revegetation of disturbed sites have been initiated, including landscaping and hydroseeding activities to ensure the sites are returned to the pre-construction state. We are in a discussion with the government regarding sediment replenishment measures to prevent the adverse effects of sediment deficiency downstream of the Alpaslan 2 dam body.

Afforestation

ENERGO-PRO Turkey launched an afforestation programme in collaboration with the Mus Forestry Directorate and in consultation with the local communities to account for ecosystem disturbance. The program's objective is to create 48 hectares of Quercus Forest and re-plant all endemic species that have been reduced due to our activities. Several endemic species have already been re-planted in various areas of the Mus province, namely the populations of *Ferula huber-morathii* and *Cirsium yildizianum*. The aim is to increase these populations twofold compared to the pre-construction levels. Progress will be monitored over a number of years to ensure the ecological integrity of the site. Forestry and botanist experts are part of the team that monitor progress regularly. Specific management plans have been prepared for afforestation and endemic species.

Wildlife protection

The Company takes a proactive approach in minimizing the negative impacts on wildlife and their habitats from our activities. To achieve this goal, we have developed a robust biodiversity monitoring programme to monitor local populations and implement adaptive management. For example, we will be installing nesting rafts in 2022 to allow the breeding of aquatic birds in the reservoir. Furthermore, we will be installing bird flight diverters on critical sections of the electricity transmission line to increase visibility of electric wires for flying birds and thus minimize the risk of collision. A fish replenishment programme has also been launched to release local fish species in the reservoir and river tributaries.

5.4.4 Social and environmental assessment of new projects

We strive to meet and exceed compliance with all applicable environmental laws and regulations in conducting our business. In our pursuit of sustainable growth, we place responsible development at the heart of our business strategy. Before starting any new project, we conduct a comprehensive social and environmental assessment of potential impacts and their mitigation. Our commitment to impact assessment has been at the core of our work in recent years due to the Alpaslan 2 and Karakurt projects. We implemented strategic initiatives to ensure that the social and environmental impact of the Alpaslan 2 project is reduced to a minimum and, if necessary, ensure that adequate rehabilitation and compensation measures are implemented. Our Environmental and Social Management Plan (ESMP) was initiated at the start of construction and implementation and monitoring will continue during operations. One of the requirements of the ESMP was the preparation and implementation of a management system, sample required documents are provided in the table below.

If any evidence of potential impacts is discovered, alternative plans are pursued. For example, when faced with litigation over our EIA report of the Karakurt Dam and HPP construction due to cultural heritage concerns, we revised the EIA and had it successfully approved. Furthermore, all social and environmental impacts were thoroughly identified prior to the commencement of the Alpaslan 2 Dam and HPP construction, with all necessary management plans developed and implemented accordingly.

The Alpaslan 2 Dam and HPP project was completed in accordance with good international industry practice (GIIP) standards and best practices and was also subjected to inspection by global companies with expertise in the field. Since the Alpaslan 2 project has become an exemplar of project management we are using it as a benchmark for future projects.,

Sample Management plans for the Alpaslan 2 project to mitigate social and environmental impacts:

- *Social Management Plan*
- *Stakeholder Engagement Plan*
- *Resettlement Action Plan*
- *Air Quality & Noise Management Plan*
- *Waste Management Plan*
- *Cultural Heritage Management Plan*
- *Community Health, Safety and Security Management Plan*
- *Reinstatement and Landscaping Plan*
- *Hazardous Materials Management Plan*
- *Erosion and Sedimentation Plan*
- *Workers' Accommodation Management Plan*
- *Grievance Mechanism Procedure*
- *Water Quality Monitoring Plan*
- *Security Management Plan*
- *Community Investment Plan*
- *Biodiversity Management Action Plan*
- *Adaptive Monitoring and Management Plan*
- *Afforestation Plan*
- *Critical Habitat Assessment*
- *Endemic Plant Replantation Plan*
- *Livelihood Restoration Management Plan*

5.5. Social



5.5.1 Operational security

The size and complexity of ENERGO-PRO Group's information and communication technologies and digital tools make us potentially vulnerable to data security breaches, cyber-attacks and system disruptions, including deliberate or inadvertent actions by our employees, suppliers or customers. Some of the risks include access to financial data, legal documentation, energy trading information, employee data, customer data and supplier information

We have an IT Department and effective cybersecurity procedures in place. Our software is regularly updated by the IT Department. There are professional security services at the power plant sites, and our security teams are continuously in touch with government security forces to ensure the security of our facilities. Our control measures include implementation of our Data Protection Policy, Remote Work Procedure and the protection of our iCloud and server content using firewalls, and through external IT monitoring and other support. To date, EP Group has not experienced any material data security breaches, cyber-attacks or significant information system disruptions.

We have never faced any security incidents at any of our facilities and there are no major geopolitical risks. All our facilities are designed to withstand extreme weather conditions, and all dam facilities are designed according to Possible Massive Flood calculation reports.

5.5.2 Reliable and affordable access to basic services

Success in tackling poverty depends to a great extent on the availability of basic services for the rural population. The principal benefit supported by ENERGO-PRO Group in Turkey is improving clean energy production, which enables the country to provide cheaper, more reliable energy to its citizens. Alpaslan will provide free 70Gwh/year energy to Mus Municipality to support pumping water for the population, this will

support irrigation and municipal water pumping for the population.. We also help the surrounding villages in terms of access to education, health care, and agricultural advice services.

5.5.3 Health & safety

We could not be a leader in the energy sector without the efforts of a safe, healthy, well-trained, and committed workforce. We value safety, integrity, personal responsibility, and teamwork in our workplaces and are committed to providing the training and education necessary for each employee to perform their tasks effectively and safely. We believe that providing and integrating a sound environmental, health, and safety programme in our business is the key to our success.

Working safely

Our dedication to safety is at the core of all our operations. Hydropower stations can pose safety risks to workers, therefore avoiding accidents is among our key priority. We work to make this priority a reality by focusing on personal awareness and incident prevention. We hold mandatory on-site and online Operational Health and Safety trainings delivered by contracted HSE experts for all employees at least three times a year. Employees working in higher risk areas participate in these trainings even more regularly. The fact that ENERGO-PRO Group in Turkey marked only 2 cases of injury in 2021 reflects the effectiveness of our health and safety programme.

We properly track and record all work-related injuries and accidents. In cases of injury or illness, a workplace doctor is available to attend to workers during construction, and during operations we rely on nearby health services and a doctor that conducts periodic visits to our HPPs.

5.5.4 Employee development

In addition to our safety trainings, we provide other trainings to employees to ensure their development and outstanding performance. The average hours of training per employee amounted to approximately 45 hours across our business units in 2021. This number is an estimate; however, we plan to implement a more efficiently tracked training system for 2022. The HR Department provides free trainings in first aid, infectious diseases, Covid-19, English training, working at height, personal growth, and more, and is currently creating a new e-training portal for 2022. The training plans for 2022 include a water saving training, ISO certification training, waste reduction training, HSE training, English language training, energy saving training, grievance mechanism training, self-motivation, wellbeing, personal & professional improvement training, policy training, and technology and metaverse training.

Figure 14: Plans for employee training and development for 2022



Benefits

We provide health care services to our full-time employees to further support employee satisfaction.

In 2020 at the end of construction of the Karakurt and Alpaslan II HPPs, we were required to retrench personnel. We prepared a retrenchment plan and provided training to employees on how to prepare resumes, enhance interview process, and how to conduct job research more efficiently. In addition, when possible we tried to minimize retrenchment by offering substitute vacant positions within Energo Pro Turkey. Employees were provided with severance packages as per Turkish regulation.

5.5.5 Relations with communities

ENERGO-PRO Group strives to create value in the Turkish energy sector and economy by facilitating investments in renewable energy at the lowest possible cost to people and nature. In instances in which it is impossible to prevent negative social impacts, ENERGO-PRO Group acts upon its commitment to provide support and adequate mitigation and compensation to affected local communities and ensure that its activities serve the people in the long run. In line with our values of transparency and integrity, we effectively engage and communicate with stakeholders in relation to social and environmental matters. The ENERGO-PRO ES team arranges Community Health & Safety Meetings with affected communities, in which it transparently communicates potential risks posed by its facilities and activities. In 2021, we held a total of 1,573 meetings, due to the Covid-19 pandemic restrictions most of the meetings were conducted via telephone; 276 occurred face-to-face, with the rest via telephone

Taking our social responsibility seriously, we are facilitating resettlement and livelihood restructuring projects in cooperation with village representatives beyond compliance with legislation and in line with international standards. We will continue engaging and supporting the village community through the implementation of the Livelihood Restoration Plan and the Community Investment Plan. Our approach to resettlement is aligned with our Sustainability Policy and Human Rights Policy.

We have a Stakeholder Engagement Plan to guide stakeholder engagement activities and to provide a platform for views and concerns to be expressed throughout the life of the project. In addition, a Grievance Mechanism Procedure enables communities to voice their concerns and complaints, providing an effective way to manage community relations. Grievance boxes have been installed in the communities to allow our stakeholders to raise their grievances in writing if they prefer.

Livelihood restoration programme for households affected by the Alpaslan 2 Project



Alpaslan 2 Project is located in Muş province in the Eastern Anatolia Region of Turkey. The Project mainly consists of a dam and hydroelectric power plant (HEPP) with all relevant structures namely the dam body, spillway, power plant, an electricity transmission line, a reservoir and other components. Operations started in 2021 after the completion of the construction phase. The construction of Alpaslan II necessitated the acquisition of land, requiring the economic and physical resettlement of households located in the vicinity of the project. The resettlement process involved both an expropriation process required by the Government of Turkey and compensation following the requirements set out in the IFC Performance Standards (PS) notably PS 5.

As part of the requirements under IFC Performance Standard #5, the project developed a Livelihood Restoration Action Plan aimed at supporting households that had been impacted by land take in enhancing or restoring their livelihoods to pre-project levels. The Livelihood Restoration Action Plan followed an extensive consultation process with the communities impacted and the local authorities.

The Livelihood Restoration Program was initiated in early 2021, firstly through the distribution of fodder as a short-term rapid investment measure to support households during the 2021 winter period. The long-term programme consists of a 5-year programme focusing on enhancing the existing livelihoods, diversification of agricultural activities and introduction of new activities. Some of the activities implemented and/or planned include:

- Establishment of market gardens located near their housing concessions. This programme consists of providing improved seedlings and training, including identification of markets and small irrigation schemes, if required.
- Capacity building in the establishment of cooperatives, communication, financial literacy training.
- Training in improved cheese and milk production, including identification of markets.
- Training on honey production and market identification.
- Business plan development and access to finance.

The delivery method includes workshops, one-to one monitoring and support, study visits, distribution of educational information, and focus Group training. An 18-month contract was signed with CSR Turkey to support the implementation of the Livelihood Restoration Action Plan, following monitoring and evaluation some of the activities could be rolled out over the next 5 years and/or modified depending on the success of the programmes.

6. Bulgaria

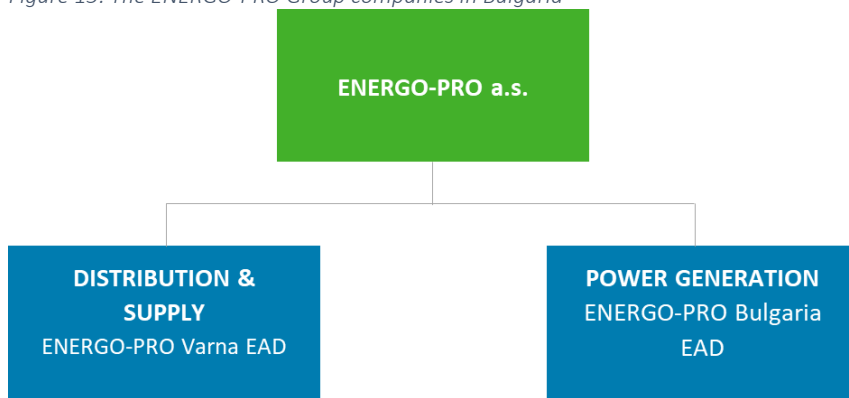
6.1. Overview

ENERGO-PRO Bulgaria EAD is the largest private producer of electricity generated in hydropower plants in Bulgaria. With a total installed capacity of 166 MW and an average annual production of electricity on the level of 357461 GWh, it is also the largest private producer of renewable energy in the country.

Bulgaria was the first country where ENERGO-PRO expanded. ENERGO-PRO Bulgaria EAD was established in 2000. It owns and operates 14 hydropower plants, of which 10 are aggregated in 4 different cascades – Sandanska Bistritsa Cascade, Pirinska Bistritsa Cascade, Koprinka Cascade, and Petrohan Cascade. Our priority is to increase electricity production and further enhance the reliability of our hydropower plants.

ENERGO-PRO Varna EAD is the parent company of the group of companies that operate, maintain and undertake the Groups’s electricity distribution, wholesale trading and supply activities in Bulgaria. Moreover, the company is also engaged in development of photovoltaic power plant portfolio. Through a subsidiary EDC North, we operate and maintain an electricity distribution network in north-east Bulgaria, which extended to 43 thousand km and distributing 5.7 TWh of electricity to more than 1.2 million customers.

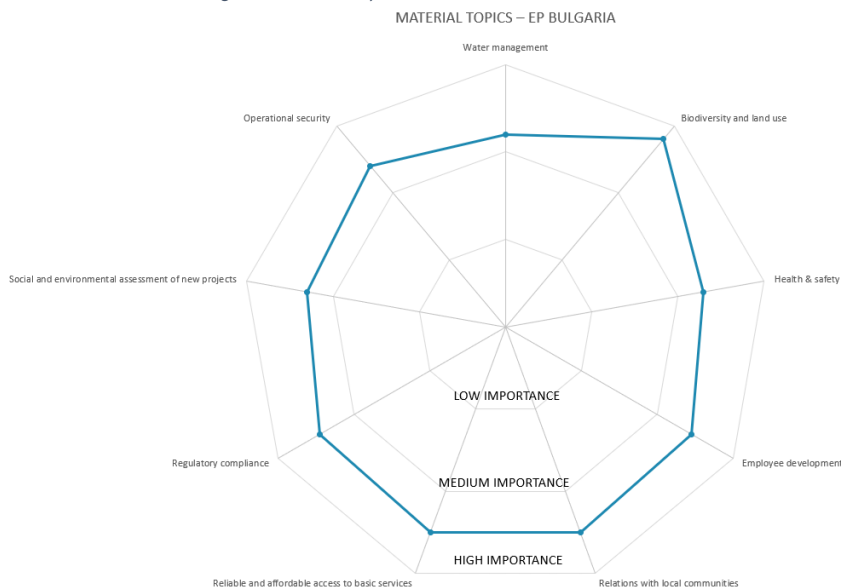
Figure 15: The ENERGO-PRO Group companies in Bulgaria



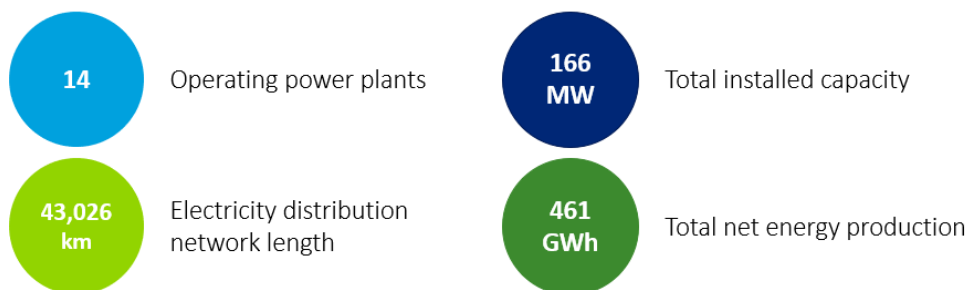
6.2. Materiality analysis

The main risks to our companies are related to safety (accidents and fatalities at work), the environment and biodiversity, and governance (e.g., bribes, cybersecurity risks). These are reflected in the materiality assessment and are at the core of our guiding principles and implemented measures.

Figure 16: ENERGO-PRO Bulgaria materiality matrix



6.3. Operations



Electricity generation

The year 2021 marked a rapid increase in total gross energy production, accounting to 471 GWh compared to 295 GWh in the previous year.

Table 6: HPPs owned and operated in Bulgaria

| HPPs | Installed capacity |
|---------------------|--------------------|
| Koprinka | 7 |
| Stara Zagora | 22 |
| Popina Laka | 22 |
| Lilyanovo | 20 |
| Sandanski | 14 |
| Petrohan | 8 |
| Barzia | 6 |
| Klisura | 4 |
| Pirin | 22 |
| Spanchevo | 28 |
| Karlukovo | 2 |

| | |
|-----------|---|
| Ogosta | 5 |
| Katunci | 3 |
| Samoranvo | 3 |

6.4. Environment

6.4.1 Biodiversity & Natural Resources

Wildlife protection

Since ENERGO-PRO Varna and ENERGO-PRO Bulgaria operate in biologically sensitive areas (Via Pontica, Natural Parks and other protected areas), we have adopted several measures to mitigate our environmental impact. Initiatives have been launched with the Bulgarian Society for the Protection of Birds and the Balkan Centre for Sustainability and Engineering to protect ecosystems and biodiversity. We also engage with local ecology experts on a regular basis to proactively identify and put in place measures to protect biodiversity.

Our distribution power lines run through the territory Via Pontica where migratory birds nest, to minimize impact on this territory we have implemented measures to protect the birds against electrocution. We have installed special nesting platforms and bird protection devices (more information vis case study below). We periodically send press releases informing the public about the areas with installed bird protection devices or incidents with injured birds.

In terms of water ecosystem and biodiversity protection, ENERGO-PRO Bulgaria EAD is implementing water management systems and cameras to monitor the water intake and the fish passes. We regularly assess the functionality of fish passes and rehabilitate them as needed to comply with the highest standards.

Since the end of 2021, ENERGO-PRO Bulgaria EAD has been planning projects related to the construction and rehabilitation of fish passes at water intake structures at the Sandanska and Pirinska Bistritsa cascades and Samoranovo HPP (three of our sites). We regularly conduct ichthyological assessments of the functionality of constructed fish passes. While some of the fish passes (Sandanska Bistrica and Samoranovo) meet the requirements of current legislation, others are outdated and need an upgrade. We contracted experts from the Bulgarian Academy of Sciences to prepare an ichthyological report, assessing the need for rehabilitation or construction of new fish passes, including the identification of ecological measures to preserve river species that occur naturally in the vicinity of the HPPs.

ENERGO-PRO Varna EAD: bird protection programme of Electro distribution North

The Electro distribution North bird protection programme is a long-term biodiversity initiative implemented year-round to ensure a thriving bird ecosystem at the place of our operations. The electricity distribution company carries out its activities on the electricity distribution facilities to protect the life and health of migratory birds mainly during autumn - early spring. Care for the environment and preserving the life of protected species is our priority. In the period of 2020 to 2021, nearly 19,500 bird protection devices of different types, worth BGN 0.9 million, were installed on the territory where the company operates. The facilities are located in North-eastern Bulgaria, where the migratory routes of birds pass.

Electro distribution North electricians often act as bird rescuers. Electro distribution North carries out periodic inspections of the facilities on which birds usually build their nests. In parallel with the maintenance of the electricity distribution grid in order to provide quality service to customers, electrical specialists are monitoring if there are not twigs and straws from stork nests dangerously hanging over the wires. The electricity distribution company also reacts to instigations raised by The Bulgarian Society for the Protection of Birds, as well as mayors and citizens of the respective region. For years, the company has been working with the Bulgarian Society for the Protection of Birds, local authorities and other institutions to secure electric poles against threats to the animals.

The main projects of Electro distribution North's bird protection programme are implemented before the spring and after the autumn migration. The aim is not to disturb the animals during their nesting and rearing season. During the summer season, the bird protection activities on the grid are more limited – concrete activities are carried out in emergencies during the active summer season for birds, when there is an imminent threat to their life and health.



Technological innovation

To prevent environmental accidents, we are gradually upgrading our technologies to meet the highest environmental standards. Since 2019 ENERGO-PRO Bulgaria EAD has implemented several environmentally friendly upgrades of electrical and hydro turbine equipment and auxiliary systems in Koprinka Cascade and Pirinska Bistrica Cascade. The upgrades have been important for preventing contamination with oil or grease and fire.

Figure 17: ENERGO-PRO Bulgaria EAD driving technical improvements in line with environmental standards – case study

01 Technical upgrades of mechanical parts



- All sliding bearings used in kinematic mechanisms and maintenance no longer require any type of lubricants due to the improvements made. All shafts for sliding bearings are produced with stainless steel materials, or stainless weld deposit and do not need grease or oil for proper functioning of the mechanism.
- To eliminate environmental pollution, the turbine bearing of HPP Koprinka has been modified. The oil lubrication system was replaced with a water lubrication system and the bearing was replaced with a new one produced by Deva BM.

02 Technical upgrades of the hydraulic parts



- All oil pressure systems are equipped with oil sumps that can store oil in tanks above them and protect from any potential spills.
- To eliminate environmental pollution, all water-cooling systems have been redesigned with closed circuit cooling to avoid any contamination.



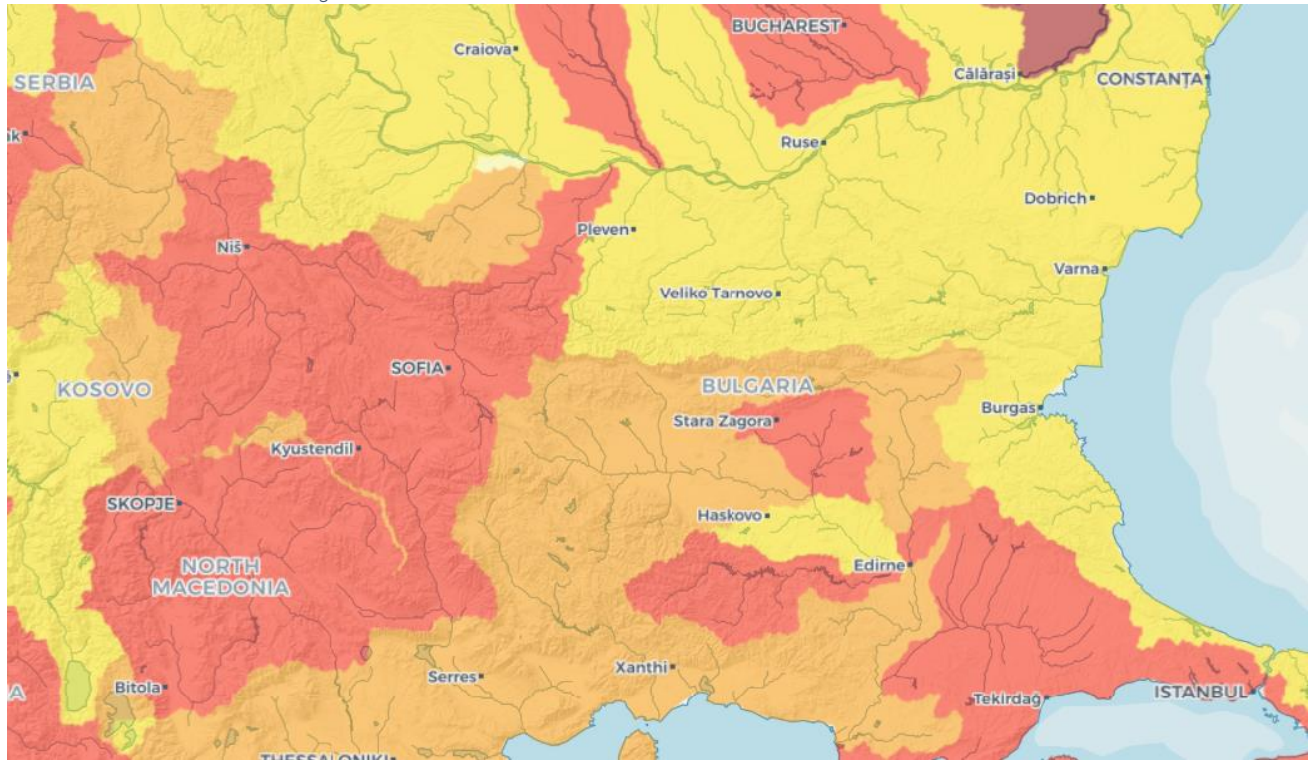
03 Technical upgrades of electric parts

- All low and high voltage cables are insulated with materials to protect against potential fire in compliance with Bulgarian regulatory requirements.

6.4.2 Water management

We draw water from mountains located in a high-water stress area. Therefore, we actively monitor the situation to ensure safety and sufficient capacity, as well as preserve freshwater biodiversity. The total amount of water withdrawn in 2021 from municipal supplies amounted to 17.8 thousand m³ for ENERGO-PRO Varna EAD and 0.6 thousand m³ for ENERGO-PRO Bulgaria EAD. Water discharge was the same for both entities, which means the total water consumption represented 0 for 2021. The same water consumption trend was observed during 2020 and 2019.

Picture 1: Water stress areas Bulgaria⁵.



6.4.3 Social and environmental assessment of new projects

Currently, we have no plans for a new construction projects in Bulgaria. However, if new projects are envisioned we will assess the risks and impacts associated with the project ensuring all regulatory permits are in place, we will prepare ESIA, ESMPs, including applying the mitigation hierarchy and developing Stakeholder Engagement Plans to involve stakeholders in the design process and communicate the project's risks and impacts and develop management plans in collaboration with stakeholders. The assessment will contain specific sections on environment, H&S (risk assessment, inspections, prevention of damage from third parties, emergency response and preparedness, biodiversity, natural resources, community health and safety, cultural heritage, land acquisition and other.

⁵ [Aqueduct Water Risk Atlas \(wri.org\)](http://wri.org)

6.5. Social



We understand the importance of contributing to social and economic development where we work and the importance of providing a positive working environment. We take many factors into consideration to develop a good working environment. These considerations include:

- Inclusion and diversity
- Living wage
- Respect for human rights
- Health and safety
- Working conditions
- Equal opportunities, including gender equality, equal pay for equal work, promotions, training and skills development and inclusivity for those with disabilities
- Local employment and procurement
- Protection of community land and assets
- Respect for cultural heritage and archaeological sites
- Community investment

All of these considerations are defined in our new ESG Policy and Human Resources Policy. We raise awareness across the company about these standards and make sure all employees not only understand their rights and benefits but also comply with all principles.

6.5.1 Relations with local communities

Social investments

ENERGO-PRO Varna is committed to fulfilling its civic and social responsibility, and we recognise the important role non-profit, charitable organizations play in the communities and state where our employees live and work. We demonstrate support for these groups through financial contributions. To ensure sustainable development and the prosperity of communities affected by our investments and activities, we

created a social fund called “ENERGO-PRO for Society” in September 2021 to help fund public interest projects. Our annual budget for funding these projects is BGN 100,000 (51,000 EUR). Through this initiative, we strive to lead by example and inspire other companies to leave a positive impact on the community. Applicant projects for funding from “ENERGO-PRO for Society” should fall within the following areas:

- Development of children
- Energy efficiency
- Environmental protection
- Upholding environmental values
- Sustainable development of urban spaces
- Safe use of electrical appliances and equipment

Priority is given to innovative projects in the above mentioned areas. The maximum funding a project can obtain is BGN 5,000. It is possible to co-finance the projects from other sources of funding. In 2021, six projects with a total value of over BGN 30,667 were approved for funding, including three kindergartens, two schools, and a treatment facility for children with cancer. The supported projects will contribute to enhancing children’s education, namely introducing modern teaching methods, spreading environmental values, and improving children’s practical skillsets in various areas. We believe that the implementation of these projects will benefit the local communities with a long-lasting impact.

ENERGO-PRO Bulgaria EAD has a sponsorship agreement with a local children’s football team, which constitutes over 90% of all social investments. The rest covers small donations for events organised by local municipalities.

Community management

ENERGO-PRO Varna has established good practices for open communication with local communities and authorities. We organise meetings with all mayors whose governance falls within our operational zones twice a year. There is always follow-up activity on issues raised during the meetings. These include new grid connections, investments, and our activities that are dependent on municipal approval. We also notify local municipalities about any planned power outages related to grid maintenance. In 2022, Energo Pro will develop a Stakeholder Engagement Standard requiring all Business Units to prepare fit for purpose Stakeholder Engagement Plans.

6.5.2 Reliable and affordable access to basic services

Our priority is to increase electricity production and further enhance the reliability of our hydropower plants. This is achieved through professional and cost-effective investments into their rehabilitation and modernization. ENERGO-PRO Bulgaria EAD shows stable growth thanks to the efficiency of technical operations and optimization of the electrical power generation process.

ENERGO-PRO Varna supplies electricity to major Bulgarian consumers under free energy market conditions. One of EP Varna’s main goals as an energy company and distribution grid operator is to ensure that its customers have a secure supply of electricity. Our approach makes us a responsible partner, providing secure supplies of electrical power and active support in the process of registration on the free market. Thanks to our reliable and accessible service, we have a steady customer base of over 1.0 million customers.

EP Varna’s distribution grids must function properly and be equipped to meet the challenges of the new energy world for EPV to continue to ensure a reliable electricity supply in the future. For this purpose, EPV

continually upgrades and develops its existing infrastructure. This enables EPV to better manage energy distribution and generation.

EDC North's distribution system operators (DSOs) are responsible for the safe and reliable operation of its distribution networks. Their network control centres oversee network operations. DSOs record all planned and unplanned outages at the distribution networks. They use these data to calculate the system average interruption duration index (SAIDI) which measures the average outages duration per customer per year. EPV has in place investment and maintenance programs to maintain and expand its grids to ensure that all of its network customers are connected and have a reliable energy supply. Investment decisions always focus on efficiency as well as security of supply. EPV chooses the solutions that make the most technical and economic sense.

In general, ENERGO-PRO Varna maintains a high and stable collection rate. In certain cases, we negotiate instalment plans with household customers having payment difficulties. There are no major issues with customer satisfaction.

Our business activities are of public interest, and therefore we are prepared to react promptly to any problems encountered. The good relations we have built with local authorities enable quick communication during critical situations and thus a prompt resolution of the problem. The most common issues we mutually solve include electricity power failures due to extreme weather conditions (occurring usually during the winter due to storms, heavy snow, icing of grid facilities, and blocked roads).

EP provides information with energy efficiency advice to its customers via its webpage, as well as brochures in its customer service centres. The company has also participated in information campaigns such as providing information and materials in 2021 for the new Energy Label of appliances introduced by the EU. ENERGO-PRO Energy Services is also a licensed energy auditor by the Sustainable Energy Development Agency of Bulgaria and conducts energy audits with advice to non-household customers for energy efficiency measures. The company is also an EPC contractor and constructs PV plants for energy consumption optimization for its customers.

6.5.3 Employee development

Benefits

We attribute our success and leading position on the Bulgarian energy market to the relentless efforts of our employees. In 2021, the number of ENERGO-PRO Bulgaria and ENERGO-PRO Varna employees totalled 2,537. To ensure the satisfaction and adequate compensation of our workforce, we provide the following benefits to our full-time employees:

Figure 18: Benefits provided by the company to employees

Figure 18: Benefits provided by ENERGO-PRO in Bulgaria

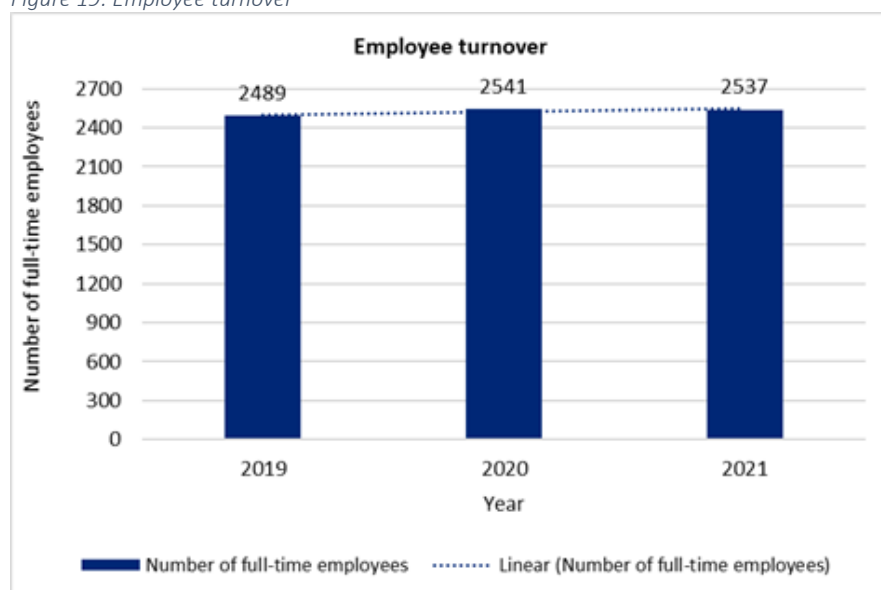
| Benefits | ENERGO-PRO in BULGARIA |
|------------------------------------|------------------------|
| Life insurance | ✓ |
| Health care | ✓ |
| Disability and invalidity coverage | ✓ |
| Parental leave | ✗ |
| Retirement provision | ✗ |
| Stock ownership | ✗ |
| Others | ✓ |

ENERGO-PRO Varna EAD offers these additional benefits to the employees:

- Additional paid leave (employees are entitled to additional paid leave if they work under specific conditions or in positions with a flexible work schedule, or for the purposes of further education or professional development)
- Additional health insurance
- Social welfare benefits (food vouchers, Easter payment, Energy Day payment, summer payment, Christmas payment)
- Medical fund for employees and their families (intended for lifesaving treatments)
- Discounts

Such compensations and work culture helps us maintain low staff turnover and hire more people. The number of our employees did not substantially decrease even during the pandemic years of 2020-2021.

Figure 19: Employee turnover



Performance evaluation & trainings

ENERGO-PRO Varna has a standardised performance evaluation procedure in place (annual for management, quarterly and monthly for employees). In 2021, various training sessions were offered to improve awareness of company policies (e.g. ESG Policy and Code of Conduct) and educate employees on diverse topics, such as compliance and GDPR. To educate our employees more effectively, an internal Training Policy has been implemented.

In 2021, ENERGO-PRO Varna employees spent a total of 38,665 hours on training, resulting on average in 16 hours of training per employee. The total number of hours spent on training in 2021 at ENERGO-PRO Bulgaria amounted to 7,224 hours, where on average, this represented 57 hours of training per employee.

81.3% of ENERGO-PRO Varna employees are covered by a collective bargaining agreement.

Responsible workforce restructuring

We do our best to protect our employees against unexpected layoffs in line with national regulations. According to the Bulgarian Labour Code (LC) and Collective Labour Agreement (CLA), when more than 10% of the workforce is laid off as a result of internal structural changes, business units are obliged to inform and coordinate such matters with the respective trade unions (TU). To date, no such structural changes have taken place. In all other cases, according to the LC and CLA, business units are obliged to offer employees substitute vacant positions should the candidates match job requirements. If there is no such position available, the laid-off employees receive a standardized severance payment.

Supporting professional development of young people

We pay special attention to the development of young professionals in the energy sector. Therefore, ENERGO-PRO Varna EAD has developed an internship and scholarship programme in cooperation with our partner secondary and higher education institutions. They provide their graduates an opportunity to gain professional experience in the field of electricity distribution. Supporting young professionals with no job experience is our established practice.

6.5.4 Operational security

ENERGO-PRO Varna JSC is certified on ISO 27001 (Information security management) and in compliance with the national cybersecurity law. Per the ISO 27001 certificate, a yearly check is conducted by an external auditor to check compliance.

6.5.5 Health & safety

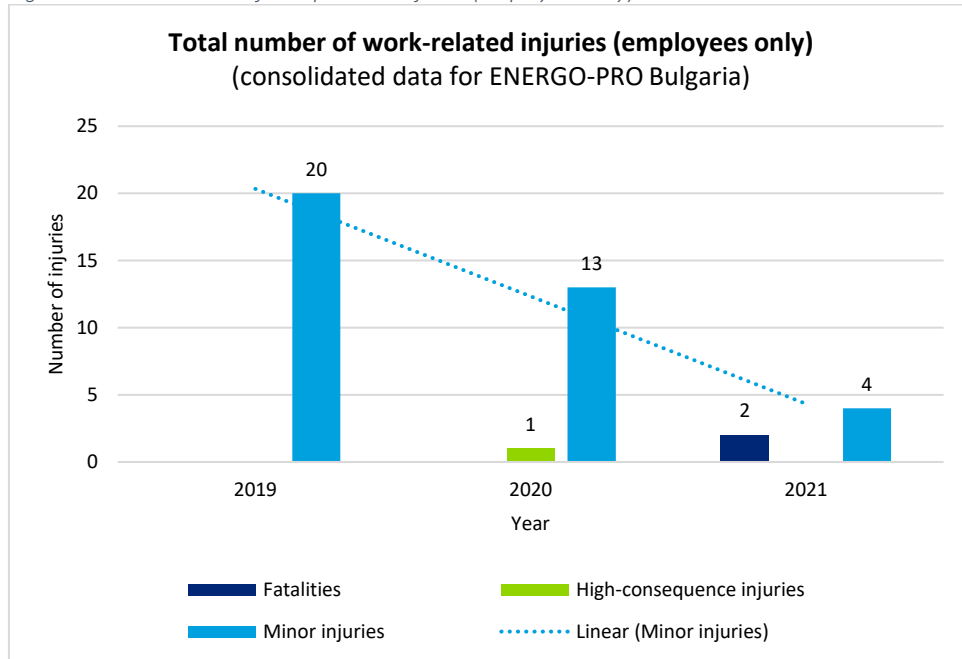
Safety is our core value and is integrated throughout all areas of our operations. Given the nature of ENERGO-PRO Bulgaria's operations, we recognise there are physical and ergonomic work-related hazards our employees face. A risk assessment is performed for each of the company's sites (HPP) and for each type of workplace, considering the specific characteristics for each work environment. These risks generally include electric shocks, traumatic injuries (fall from height, work with tools, vehicle crash, etc.) or bites from various insects or reptiles

We have a zero-accident culture and therefore health and safety is our highest priority and long-term objective. To prevent accidents, all employees are required to follow our safety principles and operating procedures. To prevent life-threatening accidents for workers engaged in agricultural and construction activities, Electro distribution North AD has prepared recommendations for safe work near power lines which all such employees must be familiar with. Since our objective to protect lives and ensure safe work

extends beyond our employees, these recommendations were sent to municipalities, institutions, and partners with a request for assistance to reach the maximum number of employees carrying out activities near power lines. The aim is to take preventive measures to preserve human life and health. These rules are also published on our intranet so our employees can access them at any time.

We are glad to report that occupational injuries at ENERGO-PRO Bulgaria dramatically decreased compared to previous years, reflecting our efforts to become accident-free. We will continue our efforts to further reduce the number of work-related injuries in the upcoming year.

Figure 20: Total number of occupational injuries (employees only)



We provide personal protective equipment to our employees and train them to use it properly. All employees in manual labour positions underwent on average 19.4 hours of trainings to ensure safe and effective work. Given our commitment to safety, the employees of our subcontractors are also obligated to undergo training and familiarize themselves with our safety plans and instructions for safe work.

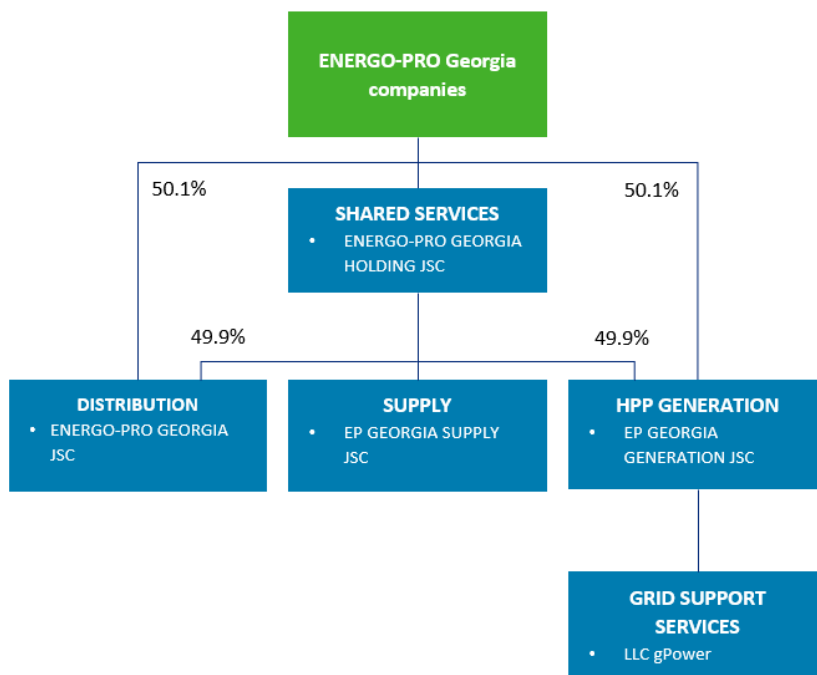
7. Georgia

Overview

Through our five branches, ENERGO-PRO Georgia serves over 1,200,000 customers. We represent one of the largest foreign investors in the South Caucasus region and we are the largest private energy generation, supply, and distribution company in Georgia.

In 2006, ENERGO-PRO established its operations in Georgia and currently operates 15 hydropower plants and one thermal power plant. In April 2021, in response to legislative and regulatory requirements, ENERGO-PRO Georgia Holding JSC was established as the holding company for the Group's energy assets in Georgia.

Figure 21: ENERGO-PRO Georgia structure⁶

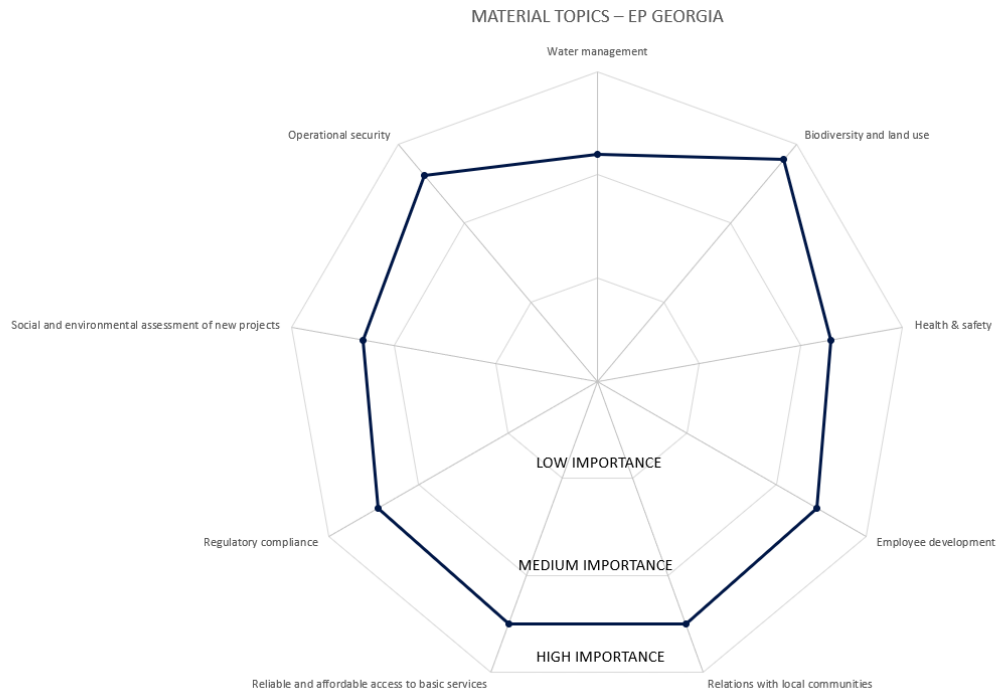


7.1. Materiality analysis

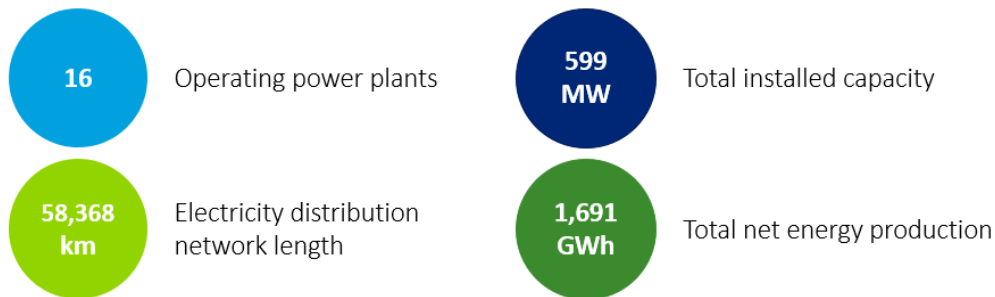
EP Georgia's material topics are determined based on our business activities, which include energy generation, distribution, supply, and supporting services as highlighted above. As a result, our material topics consist of operational security, water management, biodiversity and Natural Resources, and securing reliable and affordable access to basic services. Besides the already mentioned material topics, EP Georgia recognises risks related to relations with local communities, regulatory compliance, employee development, and health and safety.

⁶ Ownership interests are 100% unless indicated otherwise.

Figure 22: Georgia material topics' impact.⁷



7.2. Operations



Electricity generation

The company operates 15 hydropower plants and one gas turbine power plant with installed capacities of 489 MW and 110 MW respectively. The Gardabani gas turbine power plant was purchased by EP in 102010 to ensure a reliable and stable supply of electricity. The Gardabani power plant is used to supplement energy to cover peaks when energy is lacking from other sources, in other words, it is not a constant source of energy. In 2021, renewable sources accounted for 98% of our energy production, and our total net production from renewable sources increased 19%.

In 2021, EP Georgia's energy consumption was 115 GWh, representing an 88% decrease from the previous year. This was a result of favourable weather conditions, which allowed us to minimise energy generation from our Gardabani gas power plant. The energy efficiency of the gas power plant was 36%, consistent with the average over the past three years. Our total energy efficiency in 2021 was 1.5%. These high efficiency numbers are related to our renewable energy production and relatively low energy consumption.

⁷ The material topic of regulatory compliance is covered in the Governance section of Report.

Table 7: Overview of ENERGO-PRO Georgia HPPs and TPP in operation

| HPPs or TPP | Installed capacity (MW) |
|---------------------------------|-------------------------|
| Atsi | 18.4 |
| Rioni | 54 |
| Lajanuri | 113.7 |
| Gumati I | 48.4 |
| Gumati II | 22.8 |
| Shaori | 40.3 |
| Dzevrula | 80 |
| Satskhenisi | 14 |
| Ortachala | 18 |
| Sioni | 9 |
| Martkopi | 3.9 |
| Chitakhevi | 21 |
| Zahesi | 38.6 |
| Chkhori | 6 |
| Kinkisha | 0.9 |
| Gardabani Gas Power Plant (TPP) | 110 |
| Total | 589 |

7.2.1 Operational security

We have had no serious cybersecurity incidents in the past. EP Georgia has implemented an internal Data Processing and Data Protection Policy in accordance with new regulations set for DSO within the implementation of the new Georgian energy reform. In 2022, all EP Georgia companies will implement new Data Protection requirements. This is the result of a government resolution that included the company on the list of third category critical information system subjects⁸. Our cybersecurity requirements will be prepared by an external consultancy firm and will comply with ISO 27001.

7.2.2 Social and environmental assessment of new projects

EP Georgia's new development projects comply with all relevant regulations. This includes environmental and social impact assessments and specific environmental management plans issued by the state. All our HPPs except Kinikisha HPP, due to its insignificant size, and distribution segment projects are obligated to

⁸ This occurred on December 30th, 2021.

issue EIA and environmental management plans. All new projects will follow Energo-Pros policies and standards.

7.3. Environment

Specific environmental management plans have been developed and implemented to address the following environmental risks: waste management, biodiversity monitoring and research, contaminated land rehabilitation, inventory of PCB contaminated equipment, and management of areas for temporary waste storage. Each of our HPPs has a specific environmental management plan approved by the state. While compliance with the law is our top priority, we put extra emphasis on monitoring our hydraulic structures and geological and hydrological conditions through installed stations. Biodiversity protection is one of our primary areas of focus. For example, we are currently installing new fish ladders, implementing an ichthyological compensation program, and carrying out a topsoil rehabilitation project. Furthermore, we support environmental awareness and the environmental education of our employees through our Environmental Training programme.

7.3.1 Water management

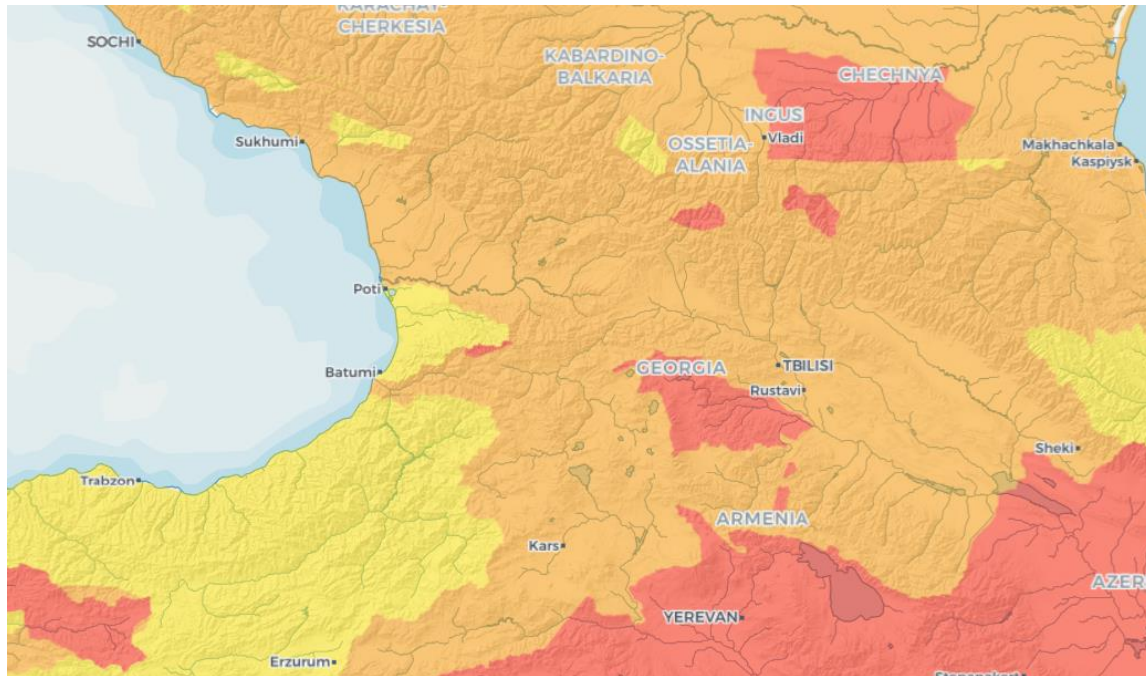
In Georgia, we use water for cooling our thermal power plants and to run our hydropower operations. Our hydropower reservoirs regulate water flow, which contributes to the reduction of floods and droughts. Currently, we collect data for our Shaori and Dzevrula reservoirs, which are seasonally regulated and filled in the spring. In 2021, the reservoirs stored a total of 73.2 mil. m³ of freshwater, resulting in a 59% annual increase compared to the previous year.

In 2021, EP Georgia's water withdrawal was 88.5 thousand m³. This represents 53% withdrawal for hydropower plant generation, 24% withdrawal for distribution and supply, and 23% withdrawal for thermal power plant generation⁹. We are limited in tracking our water discharge, which is currently only available as an estimation of 21.1 thousand m³ for our distribution and supply segment¹⁰. In coming years, we plan, to install water meters to improve our ability to track our water consumption. Our operations are not located in high water stress areas, as indicated in the map below. According to World Bank data, Georgia has very low levels of water stress at 4.21¹¹. We conduct water sample analyses to determine the total amount of nitrogen, phosphorus, weighted particles, and biological use of oxygen at the Sioni HPP, which is located on the Iori river with a drainage basin of 4,650 km².

⁹ Power generation from our thermal power plant accounts for 2% of the total energy produced highlighting a negligible impact on water stress.

¹⁰ Water use for generation is disclosed to state authorities.

¹¹ [Level of water stress: freshwater withdrawal as a proportion of available freshwater resources - Georgia | Data \(worldbank.org\)](https://data.worldbank.org/SH.UW)



Picture 2: Water stress areas Georgia¹².

7.3.2 Biodiversity and Natural Resources

Though our facilities are not located in protected areas, we carefully monitor impacts on both terrestrial and aquatic biodiversity. Our main impacts on biodiversity include evapotranspiration of reservoirs, land occupation, generation of biogenic methane emissions, and habitat fragmentation. The Department of Environmental Supervision has implemented an annual inspection plan requiring annual inspections of , facilities with environmental impacts.

¹² [Aqueduct Water Risk Atlas \(wri.org\)](http://wri.org)



Compensatory measures for the ichthyofauna of ZAHESI HPP (2022 to 2032)

The project provides a general overview of the ichthyofauna of the Mtkvari River for the ZAHESI HPP and a 10 year plan of ichthyofauna compensation measures. Reproduction issues of priority species (according to bio-conservation status and endemism) have been addressed and adequate measures implemented for European carp (*Cyprinus carpio*), Barbus (*Barbus lacerta*) and Labeobarbus (*varicorhinus*), which took the form of restocking. The first phase of the project will consist of restocking 10,000 juveniles of European carp, 5,000 juveniles of Barbus and 5,000 juveniles of Labeobarbus - with the possibility of further increase. Restocking will be performed once every two years, namely in 2023, 2025, 2027, 2029, 2031, with a total of 5 times. After one year of each restocking campaign, the same plan will be provided for: monitoring fish, aquatic invertebrates and otters in the ZAHESI HPP Impact Area. JSC EP Georgia Generation will monitor fish, aquatic invertebrates and otters through a consulting legal entity selected with relevant experience and qualifications.

Protecting local ichthyofauna

At our Zahesi HPP, we aim to protect ichthyofauna and prevent biodiversity loss. In the next years, we plan to install electro-acoustic fish deterrent systems that apply specific local conditions. It is planned that the deterrent will use electric impulses and underwater sound to cause some species of fish to swim away from the intakes.

7.4. Social



7.4.1 Health and Safety

The JSC ENERGO-PRO Georgia Holding Department of Labour Safety was recently established to ensure occupational health and safety practices in accordance with the requirements of the Organic Law of Georgia on Labour Safety¹³ and ISO 45001. It provides services on a contractual basis to JSC ENERGO-PRO Georgia, JSC EP Georgia Generation, JSC EP Supply and LCC Gpower.

While in 2021 recordable injuries at EP Georgia decreased from 11 to 3, our priority is to further reduce work-related hazards. We identified the health and safety risks associated with our activities in the generation, supply, and distribution segments. The key risks include extreme weather conditions, working with energised systems, working at heights, working with heavy mobile equipment, and other physical hazards. Appropriate control measures, including providing employees with protective equipment, are taken to reduce risks, and the remaining risk is constantly monitored. Furthermore, every employee undergoes health and safety training related to their specific position. The selection process for our contractors includes occupational health and safety criteria. If necessary, we provide health and safety training and further monitor our contractors during the contracted period.

7.4.2 Employee Development

EP Georgia has established a comprehensive training programme that includes external certifications and internal trainings for employees. Employee training is adjusted annually to ensure alignment with our business strategy and professional growth of individual employees. Capacity building programs include IOSH Managing Safely, project management, labour safety accreditation, Service+, English and Georgian language courses, IFS programs, and integration trainings. In addition, we provide environmental training once a year on a scope defined by experts and approved by the national government. In 2021, on average, we provided 4.2 hours of training per employee, while our managers received, on average, 15.9 hours of training. Approximately 20% of EP Georgia employees do not operate a personal computer, especially those living in mountainous regions. To fully implement all new policies¹⁴, including sustainability policies, we use policy training and an SMS notification system. In 2022, we plan to prepare and launch a new evaluation system

¹³ [Organic Law of Georgia on Occupational Health and Safety](#)

¹⁴ [CORPORATE RESPONSIBILITY AND COMPANY POLICIES](#)

for employees based on EP Bulgarian model. We will categorise our employees by positions, pay gaps, job longevity and assess individuals' skills, development, and aspirations, and gather feedback from managers to further improve the effectiveness and well-being of our employees.

Employee benefits

Highlighted below are the standard benefits that we provide to our full-time employees to further support employee satisfaction.

Figure 23: Benefits provided by the company to employees

| Benefits | ENERGO-PRO GEORGIA |
|------------------------------------|---------------------------|
| Life insurance | ✓ |
| Health care | ✓ |
| Disability and invalidity coverage | ✓ |
| Parental leave | ✓ |
| Retirement provision | ✓ |
| Stock ownership | ✗ |
| Others | ✗ |

Our full-time employees get additional social benefits including extra hours for doctor visits, 50 to 75% of salary payments in addition to the government's financial support during maternity leave (far beyond what is required by law in Georgia) , and access to internal and external trainings.

Gender equality

One of the company's social priorities is to improve gender equality. In 2021, 12% of our employees were female. EP Georgia is the proud winner of the "Entrepreneurship for Gender Equality" award. This award recognises that the company continues to work on various programmes and activities supporting gender equality. Our hiring process is transparent and job descriptions and job advertisements use gender-neutral language to encourage all potential candidates. For our employees, we established special training and encouragement programs. As a result, ENERGO-PRO is perceived as a "gender-friendly" company in Georgia.

Professional growth and higher education

In the past, ENERGO-PRO Georgia received an award from the Millennium Challenge Corporation for the best business partner of professional education in Georgia. This recognised our efforts and commitments toward higher education. In partnership with education providers, ENERGO-PRO has been involved in professional education for several years. Financed programs include:

Collaboration with professional colleges and universities

EP Georgia cooperates with universities, vocational institutions, professional colleges and schools via various initiatives. EP Georgia signed approximately 25 memorandums recognising support for these institutions.

Summer internship program

Since 2018, EP Georgia has been supporting students through paid internship initiatives. Students are selected from different technical universities and professional colleges in Tbilisi and otherwise regionally. Students can choose to participate in different departments, including high voltage network suasion exploitation, protection and diagnostics, designing and exploitation of electric transmission lines and equipment, generation (hydropower plants), labour safety, dispatch, SCADA” and „GIS” systems, and customer relations. Approximately 50% of the interns are hired at EP Georgia once their internships are completed.

Scholarships

Depending on EP’s needs and priorities, scholarships are provided to college and university students, thereby supporting them in completing their education.

Czech Grant Program

This programme is a partnership between ENERGO-PRO Georgia, as a partner of the Georgian Technical University, and the Czech Technical University. This programme includes the exchange of theoretical and practical experiences between the universities to help develop technical training programs. Furthermore, through this partnership, ENERGO-PRO launched a special class at the Kutaisi State University.

ENERGO-PRO and gender-focused programmes

EP Georgia is committed to systematically fostering gender equality through its numerous programs. In 2019, we received the Business for Gender Equality award organised by the Millennium Challenge Corporation. This recognised companies promoting gender equality in the workplace, marketplace, and the communities. Our gender equality programs include:

- ENERGO-PRO has been working with USAID’s **Engendering Utilities programme** since 2015 to develop tailored action plans to incorporate gender equality into its business practices and attract female students and youth. In the scopes of this project company developed flexible additional benefits system, especially for female employee; covering 50 to 75% salary (in addition to the Government’s financial support) for 6 months’ pregnancy period, approximately 2 years’ maternity period, flexible working hours during the pregnancy period, gifts for new-borns, and other.
- **Recruitment system** – Some initiatives implemented by EP Georgia include using gender-inclusive language in job advertisements, gender-sensitive job descriptions, “behaviour” based interview process, including female panel members in the interview process.



7.4.3 Relations with local communities

One of our top priorities is the safety of the neighbouring communities that surround our operations. We have implemented preventive measures to protect human health and the environment from overhead power lines and other energy infrastructure objects. We continue to improve safety by fencing our electrical installations. In addition, we have developed community health and safety management plans and awareness-raising campaigns on electrical hazards that should dramatically decrease the risk of incidents within local communities.

EP Georgia has transparent and customer-focused procedures for communicating and resolving inquiries from our customers or local communities. The positive social impact of our generation facilities is related

to the improvement of the local employment rate. To further support local communities, we contribute funding to certain charitable organisations, such as Katarzisi. Between 2021 and 2021, EP Georgia donated over 1.3 thousand EUR.

7.4.4 Reliable and affordable access to basic services

Our distribution network covers all Georgian regions except Tbilisi and two regions not controlled by the Georgian government. EP Georgia Supply provides electricity to regulated customers within the territory of the EP Georgia network and is also nominated as a “supplier of last resort”¹⁵. Such a division of the supply sectors creates certain guarantees for the protection of the population. Mechanisms for protection of vulnerable consumers are defined in the legislation, however, this does not apply to the establishment of a special tariff scheme.. EP provides benefits such as postponing the deadlines for payment of consumed electricity and the right to redistribute the debt for a certain period. In addition to the 15 HPPs that we operate, our Gardabani gas turbine power plant provides a guaranteed reserve of generation capacity to ensure the stability, security, and reliability of Georgia’s unified electricity system.

| | |
|-----------|---------------------------------|
| 13,080 | industrial customer accounts |
| 189,255 | commercial customer accounts |
| 47,914 | institutional customer accounts |
| 2,368,212 | residential customer accounts |

Table 8: Key customer figures - EP Georgia.

We are dedicated to helping combat energy poverty. Through special programs, the state and territorial administrative units provide financial assistance to low-income citizens, disadvantaged customers, pensioners, and citizens who live in the high mountain regions of Georgia. ENERGO-PRO Georgia offers supportive financial mechanisms to its customers to resolve late payment issues.

¹⁵ Until January 1st, 2023, EP Georgia Supply is obligated to provide electricity to customers who either (i) do not have an electricity supplier or (ii) were purchasing electricity on the free market but their electricity provider has subsequently left the free market.

8. Czech Republic

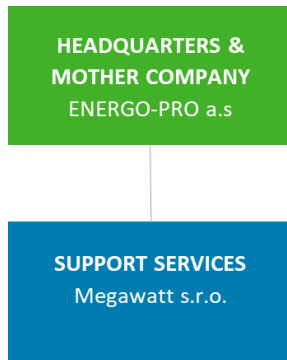
8.1. Overview

ENERGO-PRO a.s. (EPas) is the mother company of the ENERGO-PRO Group and is headquartered in Prague, Czech Republic. It was established in 1994. The main activities of EPas are power generation from hydropower plants, electricity distribution, and power trading. The ultimate holder of 100% of ENERGO-PRO a.s. shares is the entity DK Holding Investments, s.r.o. (“DKHI”) which is wholly owned by Mr. Jaromír Tesař.

Megawatt s.r.o. (MGW) is a subsidiary of EP established in 1994, whose main business activities are in consultancy relating to the hydro energy sector, as well as construction of hydro-technical facilities. The expertise of Megawatt’s specialists is utilised throughout ENERGO-PRO Group and its affiliated companies. MGW’s activities are predominantly carried out within the Group, particularly regarding the rehabilitation of the Group’s HPPs in Georgia.

Currently, we do not operate any hydropower plants in the Czech Republic.

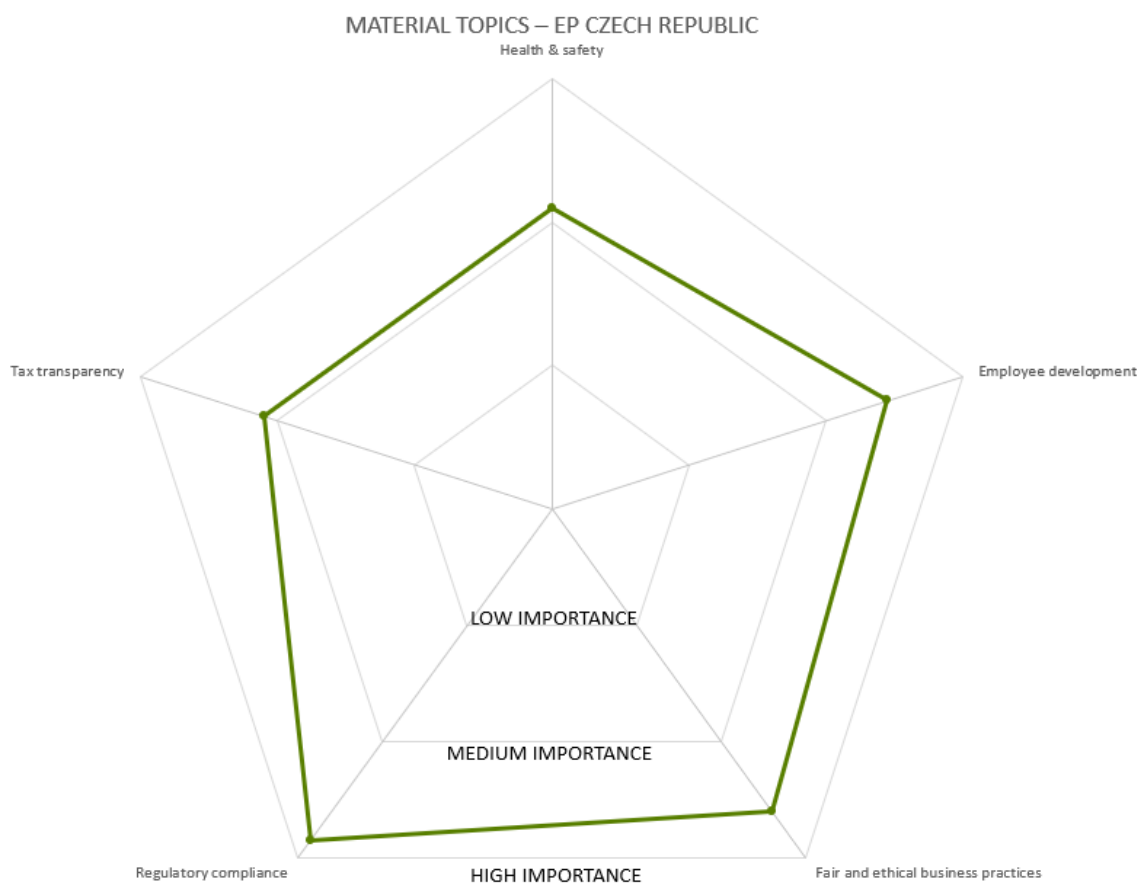
Figure 24: Company structure of ENERGO-PRO in the Czech Republic



8.2. Materiality analysis

The materiality analysis reflects ENERGO-PRO’s Czech Republic headquarter function of overseeing the entire Group of companies. Therefore, the main risks to the company relate to good governance and employee management.

Figure 25: Czech Republic material topics' impact.



8.3. Governance

8.3.1 Regulatory compliance

The Group operates in the highly regulated sectors of electricity generation, distribution, trading and supply, and related services, which are subject to a broad range of regulatory regimes on the national and EU level. Breaches of the rules may result in fines and/or regulatory intervention. To date there have been no material investigations or proceedings.

Compliance with industry-specific regulations, as well as the Group's corporate governance regime, reduces risks associated with anti-competitive behaviour.

8.3.2 Fair and ethical business practices

Anti-corruption measures

Operating our business with integrity and in a fair and responsible manner is essential for business growth. To maintain and strengthen our competitive position on the market, we have adopted a zero-tolerance policy for bribery and corruption. No material incidents of bribery or corruption occurred in 2021.

Our emphasis on integrity is not just an internal matter; we also have strict requirements for our suppliers and counterparties. Anti-corruption measures apply to all our companies and their activities, employees, and third parties, such as clients, suppliers, contractors, and service providers. All rules and principles to combat corruption and bribery are part of our internal regulations (ABC/AML Policy, Code of Conduct, Procurement Policy). We require that all employees take personal responsibility and act in accordance with the Group's ethical guidelines, which are laid out in our internal regulations. Tailor-made face-to-face training programmes, e-learning tools, instructions, and Q&A documents support these ambitions.

We expect our suppliers and business partners to act ethically and in full compliance with the applicable rules in every country where they conduct business. Additionally, we expect suppliers to adhere to all our policies and Code of Conduct.

Our employees, contractors and business partners are equally aware of the importance of avoiding any breaches as they relate to regulatory or ethical rules. They are all encouraged to report any violations.

Whistle-blower initiatives

We have implemented a Whistle-blower Policy, which provides our employees a safe platform that they can use to come forward with information relating to illegal practices or violations of internal policies. Employees are informed of our policies during onboarding, e-learning and on-site face-to-face trainings. The Whistle-blower Policy guarantees anonymity with no retaliation. Employees can report unethical behaviour directly to the appointed contact person or can do so either via email, phone, or an anonymous form. Our objective is to continuously improve the whistleblowing process, which is why a new supplier for our whistle-blower platform will be chosen in 2022.

Anti-bribery and anti-money laundering

No sponsorship of any political party or movement is permitted under our Anti-Bribery and Anti-Money Laundering Policy. Sensitive cases such as lobbying, memberships in NGOs, or trade associations engaged in political activities are addressed on an individual basis according to our Code of Conduct. Charitable donations to government organisations are authorised by the General Manager(s) and only donations intended for collective, rather than individual, needs are authorised. Donations provided to government organisations must comply with the terms of our Anti-Bribery and Anti-Money Laundering Policy. Sponsorships or contributions to associations or other entities are provided only after a diligent screening to verify:

- the scope and nature of the sponsorship or contribution,
- the business justification for the sponsorship or contribution,
- the identity and integrity of the recipient, and
- the overall legitimacy of the initiative.

8.3.3 Tax transparency

We regard tax transparency as an important component of our commitment to grow in a sustainable, responsible, and socially inclusive way. As a business operating within the Czech Republic, we are subject to taxation and ensure we pay the correct amount of tax on the profits that we earn. All of our tax obligations are transparently disclosed in our 2021 financial report.

8.4. Social



8.4.1 Employee development

We are an equal opportunity employer. Our strategy is founded on the belief that diversity and inclusion create value for ENERGO-PRO, our employees, and the societies that surround our operations. To demonstrate our commitment to diversity and inclusion, we support employees returning from maternity or parental leave and employ people with disabilities. We are strictly against gender-based discrimination and harassment in the workplace and we promote employees based on job performance.

Performance evaluation & trainings

Instead of annual performance reviews, we opt for more frequent and continuous feedback, free of formal written reviews. Employees often discuss with managers their professional goals and challenges.

As part of building a high-performance culture, we actively encourage our employees to continuously develop their skills and competencies. In 2021, a total of 76 employees spent 853 hours on training, which represented on average 11.2 hours of training per employee.

To ensure compliance with our policies, we incorporate policy awareness into our trainings. For example, our office employees familiarise themselves with these policies through online e-learning, while on-site employees undergo in-person training sessions once a year. In 2021, a training session on policies was also organised for the Board of Directors, Business Units, and team leaders.

Benefits

The standard benefits that we provide to our employees help us promote employee satisfaction, as we focus on offering benefits that meet their needs. We provide employees with 5 additional days of annual leave above the legal number and Christmas bridge-days (3-5 days). We offer social benefits that include meal allowances, free refreshments, laptops and mobile phones for business and personal purposes, favourably priced mobile tariffs including data for employees and their families, and discounts on some of the products offered by our suppliers. We also promote sports activities and employees can use a special card for sports and relaxation facilities throughout the Czech Republic.

When job losses are likely to occur due to external or internal circumstances, we ensure that we follow national law and the requirements of our Group Policy. Overall, we provide as much assistance as possible to affected employees. The company standard is to provide outplacement services, such as individual counselling, help developing resumes and cover letters, and cooperation with the Local Labour Authority for counselling and consultation - both for job search and for the period of unemployment. In addition, since many laid-off employees who have not sought employment for a long time may be unfamiliar with current job searching techniques, job search training is also provided.

8.4.2 Health and safety

Health and Safety (“H&S”) is a crucial guiding principle in our day-to-day operations. Our goal is to have zero injuries and no work-related illnesses.

The scope of our occupational health and safety management is defined in our Health and Safety Policy and in our standardised CIVOP system. It includes, but is not limited to the following:

- processing and updating mandatory documentation,
- provisions relating to personal protective equipment, and
- addressing accidents at work through proper investigation and prevention processes.

To ensure high H&S standards remain up to date with legislative changes, we continuously review workplaces in cooperation with the responsible personnel. The following measures help us to continually improve our H&S standards:

- conducting annual occupational health and safety inspections,
- conducting occupational health and safety audits (at least annually),
- providing regular occupational health and safety trainings (including legal requirements), and
- evaluating our compliance with occupational health and safety legislation.

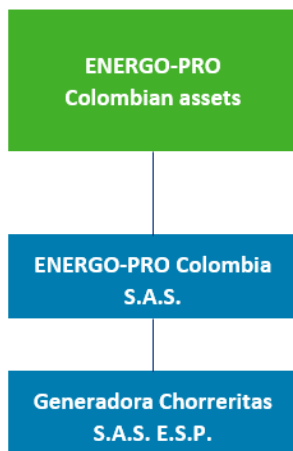
9. Colombia

9.1. Overview

The ENERGO-PRO Group is expanding business operations into Colombia, where we established our first office in 2019. Currently, we are in the process of preparing for the start of construction of a new hydropower plant under the project name “Chorreritas.” It is the Group’s first expansion outside of the Caucasus and Central and Eastern European regions. The project consists of constructing a 19.9 MW run-of-river plant (without a reservoir). Generadora Chorreritas, a fully owned subsidiary of ENERGO-PRO Colombia, is the project’s investor and developer.

Because operations have yet to commence in Colombia, there are no quantitative data and associated trends to disclose within this chapter of the Report.

Figure 26:: Company structure of ENERGO-PRO Colombia



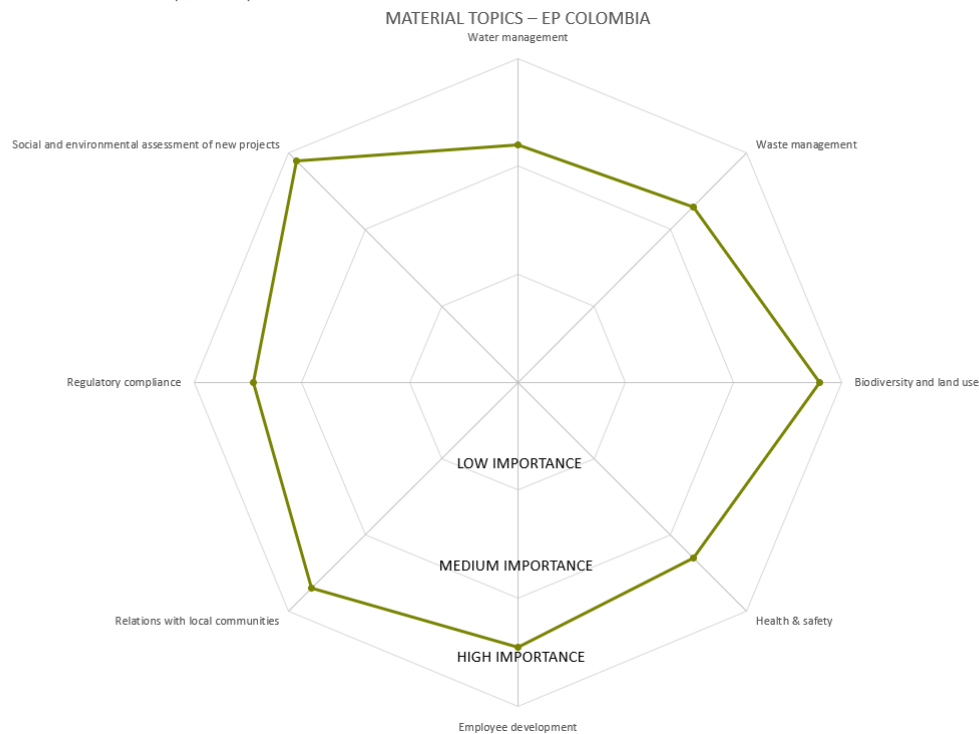
Facts about the Chorreritas project

- Construction is expected to start in 2022
- Expected to be operational in 2025
- Acquired by the ENERGO-PRO Group from a local developer in 2020
- Installed capacity of 19.9 MW
- Expected annual electricity production on 120 GWh
- Located on the San Andrés River near the town of San Andrés de Cuerquia

9.2. Materiality analysis

Given the Group's recent expansion into Colombia, the material risks correspond to the construction of the Chorreritas project. The main risks identified relate to biodiversity, water and waste management, communities, and health and safety.

Figure 27: Colombia material topics' impact



9.3. Environment

9.3.1 Environmental management

Environmental management provides accountability and a regular overview of our environmental performance. A delegated environmental supervisor is responsible for handling our day-to-day field activities.

Our objective is to execute the project in line with our values and to support the broader community. This is reflected in our Information and Communication Plan (the Stakeholder Engagement Plan), which is expected to be executed in the second quarter of 2022. It will include:

- Informative meetings on matters relating to communication, contractors, schedules, and management plans.
- Follow-up meetings to discuss the construction process and its compliance with our Social and Environmental Management Plan. These meetings will be held in the project's area of impact and will host authorities and community members from San Andrés de Cuerquia.
- Brochures containing updates on the construction and execution of the Social and Environmental Management Plan, as well as other topics relevant to stakeholders.

- Mobile office for social management with the aim of facilitating access to the project for all stakeholders.

9.3.2 Water management

We strive to conserve water as well as ensure its quality to reduce environment impact and risk. Therefore, measures to minimise our impact on water will already be implemented during the construction phase of the project. These measures include:

- Flow monitoring of at least seven water sources with follow-up checks twice a year.
- Installation of two hydrometric stations for measuring flow of the San Andrés River.
- Annual monitoring of the physical-chemical quality of the San Andrés River.
- Annual trainings on minimising and efficiently using water will be provided to personnel.
- Monitoring of industrial water discharge during the construction phase and of domestic wastewater during the operation phase of the project. This will be completed every six months during the construction phase and annually during the operation phase.

9.3.3 Waste management

The construction of hydropower projects is associated with the generation of significant volumes of waste. Therefore, waste management plans will be prepared and implemented based on a detailed assessment of the nature and volumes of generated waste. To establish good practice, each contractor under our general management programme will be obligated to provide a waste management plan and/or strategy that they will follow during their contracted activities. Hazardous waste handling is addressed in detail in the ESIA.

9.3.4 Biodiversity and Natural Resources

We acknowledge that construction of hydropower plants disrupts surrounding ecosystems. Therefore, throughout the Chorreritas project delivery, we are committed to demonstrating the utmost care for the environment by implementing the Environmental and Social Management Plan and management systems, complying with relevant national regulations, applying the mitigation hierarchy and avoiding protected or biologically sensitive areas. We will compensate for any inevitable biodiversity loss suffered due to the hydropower plant construction, in alignment with a targeted conservation strategy and plan.

The main ecological risks will be associated with the loss of a riparian forest (2 ha) due to the construction of the intake/pond head, pressure pipe, and powerhouse. However, the project area has previously been disturbed by farming and infrastructure development, including the 25AM road which passes directly along the San Andrés River.

In total, the project will have an ecological impact on an area of 4.78 ha, which is equivalent to a compensation area of 28 ha. This will require an acquisition of one or more areas adding up to 28 ha. These acquired areas must comply with the principle of equivalence (belonging to the same type of biotic unit where the project is carried out). Sufficient recovery of the area is expected to occur within 4 years. Once an authorised environmental agency verifies our compliance with the necessary criteria, the area will be handed over to the relevant municipality to continue its preservation.

Picture 4 Typical activities of the reforestation program



To reduce the negative impacts of hydropower on water ecosystems, we will be implementing a large number of initiatives that aim to maximise ecological benefits, including:

- monitoring macroinvertebrates and periphyton in the San Andrés River,
- providing annual training on efficient use of water for personnel linked to the project,
- establishing riparian vegetation in areas with reduced water flow,
- repopulation of Sabaletas and molluscs,
- providing biodiversity conservation trainings for community members, and
- implementing a programme focused on the rescue and salvage of ichthyofauna during the temporary diversion of the San Andrés River.

We also aim to create and implement programmes for efficient material use, thereby reducing our reliance on natural resources. Currently, initiatives related to the re-use of wood from forest exploitation for the construction phase of the project are being explored.

9.3.5 Social and environmental assessment of new projects

While the Chorreritas project will help address climate change through its low-carbon production of energy, the development of hydropower plants still raises concerns regarding biodiversity and local community impact. Therefore, to maximise our positive social and environmental impact, we are closely monitoring and managing this project.

We ensure our project activities comply with all national regulations. In accordance with current national regulations related to the environmental licensing of projects, the PCH Chorreritas project has implemented an Environmental Management Plan and a Follow-up and Monitoring Plan. With these plans in place, prevention, mitigation, correction, and compensation measures have been identified.

Our Environmental and Social Impact Assessment was prepared by a qualified Colombian consulting firm and contains information on the potential risks, along with proposed mitigation measures. We are currently

in the process of obtaining a Hydropower Sustainability Environmental, Social and Governance (“HESG”) assessment, aiming to identify and address gaps according to Good International Industry Practice (GIIP).

Case Study – HESG Assessment

ENERGO-PRO Colombia is seeking certification for the Chorreritas Project from the IHA Sustainability (IHAS), a subsidiary of the International Hydropower Association. The process includes an initial assessment by IHAS Accredited Assessors followed by a certification process. This initial assessment was conducted in March 2022 and co-financed by the Swiss State Secretariat for Economic Affairs (SECO). The Accredited Assessors evaluated the project using the Hydropower Sustainability Environmental, Social and Governance Gap Analysis Tool (HESG). The HESG consisted of 12 sections that covered environmental, social, governance and climate change topics. The key output of the HESG assessment was a report that included an Environmental and Social Action Plan, gaps in our approach to good practice and recommended actions to resolve the identified gaps.

We are seeking this certification to further improve our performance as it relates to our social and environmental responsibilities. We will ensure that our performance aligns with the IHAS standards and Good International Industry Practice (GIIP). Through this practice, we are also aiming to enhance relationships and communication with stakeholders, which include local communities, local and national authorities, and civil society organisations.

ENERGO-PRO will carry out environmental and social supervision directly through a permanent internal team on site, while the implementation of the Environmental Social Management Plan (“ESMP”) will be outsourced to a contractor.

To obtain an environmental licence, we conducted an impact assessment of the activities related to the construction of our project. ENERGO-PRO benefitted, among other things, from the experience of the construction of the Alpaslan 2 hydropower plant in Turkey, which was implemented in accordance with the IFC Environmental & Social Performance Standards.

Figure 29: Overview of potential risks

So far, there have been:

- No public policy incidents
- No stakeholder complaints regarding ESG issues
- No evidence of risks related to regulatory compliance
- No litigation processes

We are aware of potential limitations with regards to public agencies that may cause delays in the decision-making process of this project. While no major obstacles related to project management or planning have been identified, our engagement with public institutions might be challenging. Possible obstacles may stem from the low recognition of public institutions in this rural area, potentially hindering decision-making and thus project planning. Therefore, to facilitate better project management, we aim to establish relations with public officials that will allow for open and transparent dialogue. We also plan to support community representatives with trainings.

Picture 5: Meeting with San Andrés major and municipal administration



9.4. Social



9.4.1 Relations with local communities

Due to a history of social and environmental incidents related to hydropower development in Colombia, we have found that local communities are hesitant to accept this project quickly. Therefore, we are prepared to do everything in our capacity to overcome this public distrust, duly addressing all concerns that might arise. This scepticism stems from the public fear of potential flooding, landslides, displacement of people, and reduced water availability for the local communities.

Community dialogues

To manage the risk of possible public protest, we have been communicating about the construction project openly and extensively with multiple stakeholders, including environmental agencies, local authorities, affected property owners and community representatives. We plan to continue to communicate regularly with communities not only during the initial phases of the project but throughout our activities.

To further strengthen the established relationships between ENERGO-PRO and local communities, we have prepared a thorough Stakeholder Engagement Plan, which includes:

- resolving complaints, petitions, and grievances,
- monitoring the development of construction activities and then operations, and
- monitoring environmental management activities with an emphasis on quality control.

9.4.2 Employee development

We are committed to complying with all applicable labour laws. Since national regulation highlights the protection of workers as it relates to job security and respect for human rights, we will be adhering to national standards and Energo Pro's global policies and Code of Conduct. Child labour and slavery are strictly prohibited.

The development of training programs and internal and external audits is being discussed; however, no concrete plans have been implemented.

9.4.3 Health and safety

We acknowledge that the most significant occupational health and safety hazards related to hydropower projects often occur during the construction phase. Safety hazards are mainly physical and include over-exertion, slips and falls, working at heights, moving heavy machinery, exposure to vibrations and dust, and working in confined spaces. To prevent accidents related to these hazards, a work safety programme will be implemented once construction of PCH Chorreritas begins. The programme will be prepared in line with Colombian legislation, good practices, Energo Pro Health and Safety Policy, and the risk analysis of hazards relating to specific job profiles. All necessary permits will be obtained, and work safety trainings will be mandatory for all employees. All employees will be provided with tailored personal protective equipment and trained to use it properly. A zero-tolerance policy on the abuse of psychoactive substances will be enforced.

The health and safety programme will fall under a specialist on "Safety, Health and the Environment" whose responsibilities will include verifying compliance with internal policies and legislation, promulgating best safety practices within the workplace, and continuously proposing measures aimed at improving the programme.

To ensure that human rights are not violated, a Human Rights Guide (adhering to Energo Pro's Human Rights Policy) has been created and will be implemented for the entire duration of the entire project. It will apply to all activities, contractors, and subcontractors, especially those who provide physical security services. Within the framework of the company's security policy, a Human Rights Compliance Assessment will be conducted, and will be applied to contractors of physical security services prior to their recruitment.

10. Annex

10.1. Data

10.1.1 Methodology

The data presented in this Report were consolidated based on their relevance or materiality to individual business activities. EP's management is responsible for the completeness, accuracy, and validity of the information contained in this Report. Data are based on the input received from internal data collection and management systems. Because we operate in countries with different regulations, legislation, and data gathering practices, there are inconsistencies within some data sets. To ensure transparency, we highlight and explain these inconsistencies where relevant within the data below. We are committed to further improving our data collection processes. The contents of the Report and the topic boundaries are presented in the tables below and Report structure and boundaries section.

Table 9: Business units and main business activities.

| Business activities | Bulgaria | Colombia | Czech Republic | Georgia | Turkey |
|-----------------------------------|-------------------------|----------------------------|-----------------|---|---|
| Headquarters | | | ENERGO-PRO a.s. | | |
| Generation | ENERGO-PRO Bulgaria EAD | | | EP GEORGIA GENERATION JSC, LLC gPower | RESADIYE HAMZALI ELEKTRİK ÜRETİM SANAYİ VE TİCARET A.Ş., BİLSEV ENERJİ ÜRETİM VE TİCARET A.Ş., Murat Nehri Enerji Üretim A.Ş. |
| Supply and distribution | ENERGO-PRO Varna EAD | | | ENERGO-PRO GEORGIA HOLDING JSC, ENERGO-PRO GEORGIA JSC, EP GEORGIA SUPPLY JSC | |
| Support services | | | Megawatt s.r.o. | | |
| Trading | | | | | ENERGO-PRO GÜNEY ELEKTRİK TOPTAN SATIS İTHALAT İHRACAT VE TİCARET A.Ş. |
| Construction | | | | | ENERGO PRO İNŞAAT SANAYİ VE TİCARET A.Ş. |
| Recent project development | | ENERGO-PRO Colombia S.A.S. | | | |

Table 10: Reporting boundaries and notes related to data consolidation. Highlighted table cells represent the relevance or materiality of the data table information for individual BUs.

| Data table information | Bulgaria | Colombia | Czech Republic | Georgia | Turkey | Notes |
|----------------------------------|----------|----------|----------------|---------|--------|---|
| Main business information | | | | | | Relevant indicators are material to every operating BU. Not material to Colombia project development. In 2021, the following indicators are provided for Georgia BU from 01/07/2021 to 31/12/2021 to avoid double counting: total customer accounts (industrial), total customer accounts (commercial), total customer accounts (institutional), and total customer accounts (residential). This is because the customers from ENERGO-PRO GEORGIA JSC were transferred to the newly established EP GEORGIA SUPPLY JSC. |
| Energy consumption | | | | | | Material to all BU except Colombia project development. The data for Georgia are not fully disclosed. This is the result of insufficient data obtained by service provider. |

| | | | | | | |
|--|--|--|--|--|--|---|
| Installed capacity | | | | | | Material to generation companies. |
| Energy production | | | | | | Material to generation companies. |
| Water withdrawal | | | | | | Material to all BU except Colombia project development. The data for Georgia is not available. This is the result of insufficient data obtained by service provider. |
| Water discharge | | | | | | Material to all BU except Colombia project development. Bulgaria, Georgia, and Turkey BU data are not measured by service provider. According to facility managers the water discharge is estimated to be equal to water withdrawal. For some companies, the data are unavailable: ENERGO-PRO GÜNEY ELEKTRİK TOPTAN SATIS İTHALAT İHRACAT VE TİCARET A.Ş., ENERGO-PRO GEORGIA HOLDING JSC, EP GEORGIA SUPPLY JSC, and LLC gPower. |
| Water storage | | | | | | Material to generation companies. Data provided covers two facilities in Georgia and Turkey. We implement tools for data gathering. |
| Waste | | | | | | Material to all BU except Colombia project development. ENERGO-PRO Bulgaria non-hazardous waste data is not provided by local municipality contracted to dispose waste. In 2019, ENERGO-PRO a.s. non-hazardous waste data included only Blasko site. Total hazardous waste produced by EP GEORGIA GENERATION JSC is disclosed, while other Georgian companies cannot disclose the information. This is the result of insufficient data obtained by service provider. |
| Environmental laws and regulations compliance | | | | | | Material to all BU. |
| Employees | | | | | | Material to all BU. Employees totals are average FTE headcounts throughout the reporting year. |
| New employee hires and employee turnover | | | | | | Material to all BU. |
| Employee training | | | | | | Material to all BU. Average training hours in the Turkey BU was estimated. |
| Work-related injuries | | | | | | Material to all BU. |
| Donations | | | | | | Material to all BU. |
| Laws and regulations compliance (in the social and economic area) | | | | | | Material to all BU. |

10.1.2 Data tables

The data presented include year 2019, 2020 and 2021 for EP a.s., not including Bilsev and Murat Nehri companies. Further, there are separately presented data for 2021 for Bilsev and Murat Nehri companies as well as EP a.s. consolidated data including Bilsev and Murat Nehri companies.

| | EP a.s. | EP a.s. | EP a.s. | BE ¹⁶ | MNE ¹⁷ | EP a.s., BE a.s., MNE a.s. |
|---|-------------|-------------|---------------|------------------|-------------------|----------------------------|
| Main business information | 2019 | 2020 | 2021 | 2021 | 2021 | 2021 |
| <i>total customer accounts (industrial)</i> | 6 666 | 6 753 | 6 614 | N/A | N/A | 6 614 |
| <i>total customer accounts (commercial)</i> | 265 618 | 288 371 | 428 318 | N/A | N/A | 428 318 |
| <i>total customer accounts (institutional)</i> | 45 858 | 46 676 | 84 222 | N/A | N/A | 84 222 |
| <i>total customer accounts (residential)</i> | 2 232 334 | 2 255 624 | 3 469 383 | N/A | N/A | 3 469 383 |
| <i>total amount supplied to the grid</i> | 11 818 | 11 087 | 11 602 | 178 | 610 | 12 389 |
| <i>total amount traded</i> | 11 007 | 11 217 | 11 450 | N/A | N/A | 11 450 |
| <i>net sales</i> | 722 758 092 | 667 837 310 | 1 070 829 480 | 13 636 | 43 770 | 1 070 886 886 |
| <i>EBITDA</i> | 100 865 151 | 79 899 039 | 183 680 958 | 11 034 | 40 324 | 183 732 316 |
| Energy consumption (GWh) | | | | | | |
| Total fuel consumption - conventional sources | 273 | 202 | 106 | N/A | N/A | 106 |
| <i>gas</i> | 267 | 198 | 105 | N/A | N/A | 105 |
| <i>other</i> | 5 | 5 | 2 | N/A | N/A | 2 |
| Total fuel consumption - renewable sources | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>biomass</i> | | | | | | |
| <i>other</i> | | | | | | |
| Total purchased energy for consumption | 28 | 28 | 20 | 2 | 1 | 23 |
| <i>electricity</i> | 26 | 26 | 17 | 2 | 1 | 20 |
| <i>heating</i> | 2 | 2 | 2 | 0 | 0 | 2 |
| <i>cooling</i> | 0 | 0 | 0 | 0 | 0 | 0 |
| <i>steam</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| Total energy sold | 1 494 | 1 023 | 976 | 184 | 667 | 1 827 |
| <i>electricity</i> | 1 494 | 1 023 | 976 | 184 | 667 | 1 827 |
| <i>heating</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>cooling</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>steam</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| Installed capacity (MW) | | | | | | |
| Total installed capacity | 857 | 857 | 859 | 97 | 280 | 1 236 |
| Total installed capacity - conventional sources | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>gas</i> | 110 | 110 | 110 | N/A | N/A | 110 |
| <i>other</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| Total installed capacity - renewable sources | 747 | 747 | 749 | 97 | 280 | 1 126 |
| <i>hydro</i> | 747 | 747 | 749 | 97 | 280 | 1 126 |
| <i>other</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| Energy production (GWh) | | | | | | |
| Total gross production | 2 550 | 2 274 | 2 490 | 179 | 610 | 3 279 |
| Total net production | 2 501 | 2 230 | 2 451 | 177 | 609 | 3 236 |
| Total gross production - conventional sources | 99 | 73 | 38 | N/A | N/A | 38 |
| <i>gas</i> | 99 | 73 | 38 | N/A | N/A | 38 |
| <i>other</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| Total net production - conventional sources | 95 | 70 | 36 | N/A | N/A | 36 |
| <i>hydro</i> | 95 | 70 | 36 | N/A | N/A | 36 |
| <i>other</i> | 0 | 0 | 0 | N/A | N/A | 0 |

| | | | | | | |
|---|---------|---------|---------|-----------|------------|------------|
| Total gross production - renewable sources | 2 451 | 2 201 | 2 452 | 179 | 610 | 3 241 |
| <i>gas</i> | 1 883 | 1 713 | 2 151 | N/A | N/A | 2 151 |
| <i>other</i> | 568 | 488 | 301 | 179 | 610 | 1 090 |
| Total net production - renewable sources | 2 406 | 2 160 | 2 414 | 177 | 609 | 3 200 |
| <i>hydro</i> | 2 406 | 2 160 | 2 414 | 177 | 609 | 3 200 |
| <i>other</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| Water withdrawal (thousand m³) | | | | | | |
| Total volume of water withdrawn | 173 | 162 | 160 | 15 | 20 | 195 |
| withdrawal from: | | | | | | |
| <i>Surface water</i> (water that occurs naturally on the Earth's surface) | 3 | 2 | 1 | N/A | N/A | 1 |
| <i>Groundwater</i> (water that is being held in, and that can be recovered from, an underground formation) | 75 | 67 | 63 | N/A | N/A | 63 |
| <i>Seawater</i> (water in a sea or in an ocean) | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>Produced water</i> (water that enters an organization's boundary as a result of organizational activities, ex. extraction) | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>Third-party water</i> (refers to municipal water suppliers and municipal wastewater treatment plants, public or private utilities, and other organizations involved in water use and effluents) | 95 | 93 | 96 | 15 | 20 | 131 |
| Water discharge (thousand m³) | | | | | | |
| Total water discharged | 147 | 142 | 140 | 15 | 20 | 175 |
| Total water discharged that was: | | | | | | |
| <i>reused by the company (recycled)</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>reused by another company</i> | | | | | | |
| Water Consumption | | | | | | |
| Total water consumption | 26 | 19 | 20 | 0 | 0 | 20 |
| Total water storage (facility or reservoir) | | | | | | |
| <i>at the beginning of the reporting period</i> | 2047300 | 2036160 | 2055930 | 268730000 | 1351570000 | 1622355930 |
| <i>at the end of the reporting period</i> | 2036160 | 2055930 | 2083210 | 182920000 | 1314820000 | 1499823210 |
| Waste (tons) | | | | | | |
| Total waste produced | | | | | | |
| <i>hazardous</i> | 426 | 164 | 217 | N/A | 11 | 217 |
| <i>non-hazardous</i> | 1140 | 1992 | 1106 | 2 | 285 | 1393 |
| <i>Disposal method - hazardous waste:</i> | 426 | 164 | 217 | 0 | 0 | 217 |
| <i>reuse</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>recycle</i> | 12 | 4 | 0 | N/A | N/A | 0 |
| <i>compost</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>recovery, including energy recovery</i> | 8 | 13 | 9 | N/A | 9 | 9 |
| <i>incineration (mass burn)</i> | 7 | 0 | 8 | N/A | N/A | 8 |
| <i>deep well injection</i> | 135 | 17 | 106 | N/A | 2 | 106 |
| <i>landfill</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>on-site storage</i> | 0 | 0 | 0 | N/A | N/A | 0 |

¹⁶ Bilsev Enerji Üretim VE Ticaret A.Ş.

¹⁷ Murat Nehri Enerji Üretim A.Ş.

| | | | | | | |
|---|------|------|------|-----|-----|------|
| <i>other</i> | 265 | 130 | 93 | N/A | N/A | 93 |
| <i>Disposal method - non-hazardous waste:</i> | 1140 | 1992 | 1393 | 0 | 0 | 1393 |
| <i>reuse</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>recycle</i> | 481 | 883 | 4 | 2 | 144 | 149 |
| <i>compost</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>recovery, including energy recovery</i> | 1 | 1 | 1 | N/A | 1 | 1 |
| <i>incineration (mass burn)</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>deep well injection</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>landfill</i> | 0 | 0 | 140 | N/A | 140 | 140 |
| <i>on-site storage</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>other</i> | 659 | 1108 | 1102 | N/A | N/A | 1102 |

Environmental laws and regulations compliance

Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations in terms of:

| | | | | | | |
|--|------|------|---|-----|-----|---|
| <i>total monetary value of significant fines</i> | 3867 | 2956 | 0 | N/A | N/A | 0 |
| <i>total number of non-monetary sanctions</i> | 0 | 0 | 1 | N/A | N/A | 1 |
| <i>cases brought through dispute resolution mechanisms</i> | 3 | 4 | 2 | N/A | N/A | 2 |

Employees

| | | | | | | |
|--|-------|-------|-------|----|----|-------|
| Total number of employees | 8 967 | 8 875 | 8 834 | 29 | 42 | 8 905 |
| <i>males</i> | 7 532 | 7 442 | 7 370 | 27 | 39 | 7 436 |
| <i>females</i> | 1 435 | 1 433 | 1 464 | 2 | 3 | 1 469 |
| Total number of employees on a temporary contract | 136 | 142 | 152 | 2 | 6 | 160 |
| <i>males</i> | 108 | 107 | 107 | 1 | 6 | 114 |
| <i>females</i> | 28 | 35 | 45 | 1 | 0 | 46 |
| Total number of employees on a permanent contract | 8 832 | 8 736 | 8 684 | 27 | 36 | 8 747 |
| <i>males</i> | 7 424 | 7 338 | 7 266 | 26 | 33 | 7 325 |
| <i>females</i> | 1 408 | 1 399 | 1 419 | 1 | 3 | 1 423 |
| Total number of full-time employees | 8 961 | 8 869 | 8 826 | 29 | 42 | 8 897 |
| <i>males</i> | 7 528 | 7 438 | 7 366 | 27 | 39 | 7 432 |
| <i>females</i> | 1 433 | 1 430 | 1 459 | 2 | 3 | 1 464 |
| Total number of part-time employees | 12 | 13 | 15 | 0 | 0 | 15 |
| <i>males</i> | 9 | 9 | 9 | 0 | 0 | 9 |
| <i>females</i> | 3 | 4 | 6 | 0 | 0 | 6 |
| Number of employees covered by a collective bargaining agreement | 3294 | 3189 | 2985 | 0 | 0 | 2985 |

New employee hires and employee turnover

| | | | | | | |
|---------------------------|-----|-----|-----|---|----|-----|
| Total number of new hires | 904 | 461 | 670 | 3 | 14 | 687 |
| <i>males</i> | 682 | 388 | 554 | 3 | 14 | 571 |
| <i>under 30 years old</i> | 275 | 145 | 249 | 1 | 3 | 253 |
| <i>30-50 years old</i> | 357 | 190 | 267 | 2 | 10 | 279 |
| <i>over 50 years old</i> | 50 | 53 | 39 | 0 | 1 | 40 |
| <i>females</i> | 222 | 73 | 115 | 0 | 0 | 115 |
| <i>under 30 years old</i> | 72 | 23 | 29 | 0 | 0 | 29 |
| <i>30-50 years old</i> | 100 | 46 | 70 | 0 | 0 | 70 |
| <i>over 50 years old</i> | 50 | 4 | 16 | 0 | 0 | 16 |

| | | | | | | |
|---|----------|----------|----------|-------|--------|----------|
| Total number of leavers | 609 | 586 | 625 | 12 | 14 | 651 |
| <i>males</i> | 497 | 513 | 536 | 10 | 12 | 558 |
| <i>under 30 years old</i> | 109 | 95 | 164 | 1 | 3 | 168 |
| <i>30-50 years old</i> | 225 | 212 | 154 | 5 | 6 | 165 |
| <i>over 50 years old</i> | 163 | 206 | 217 | 4 | 3 | 224 |
| <i>females</i> | 112 | 72 | 89 | 2 | 2 | 93 |
| <i>under 30 years old</i> | 11 | 16 | 8 | 0 | 1 | 9 |
| <i>30-50 years old</i> | 74 | 37 | 52 | 1 | 1 | 54 |
| <i>over 50 years old</i> | 27 | 21 | 29 | 1 | 0 | 30 |
| Employee training | | | | | | |
| Total training hours | 117782 | 74761 | 77486 | 1305 | 1890 | 80681 |
| <i>males</i> | 104646 | 65460 | 66611 | 1215 | 1755 | 69581 |
| <i>females</i> | 13136 | 9301 | 10875 | 90 | 135 | 11100 |
| Total training hours (by employee level) | | | | | | |
| <i>Executives</i> <i>(includes board members)</i> | 344 | 364 | 428 | 0 | 0 | 428 |
| <i>Managers</i> <i>(includes senior managers and managers)</i> | 6770 | 4959 | 7279 | 90 | 405 | 7774 |
| <i>Employees in other positions</i> | 110668 | 69438 | 69779 | 1215 | 1485 | 72479 |
| Total training hours (by employee position) | | | | | | |
| <i>Employees in administrative positions</i> | 16967 | 13037 | 12034 | 180 | 135 | 12349 |
| <i>Employees in technical positions</i> <i>(ex. engineers, technicians)</i> | 24579 | 17080 | 15221 | 315 | 450 | 15986 |
| <i>Employees in manual labour positions</i> <i>(ex. field work, production, maintenance)</i> | 74109 | 41561 | 47306 | 720 | 900 | 48926 |
| Average training hours | 13 | 8 | 9 | 45 | 45 | 9 |
| <i>males</i> | 14 | 9 | 9 | 45 | 45 | 9 |
| <i>females</i> | 9 | 6 | 7 | 45 | 45 | 8 |
| Average training hours (by employee level) | | | | | | |
| <i>Executives</i> <i>(includes board members)</i> | 11 | 12 | 11 | N/A | N/A | 11 |
| <i>Managers</i> <i>(includes senior managers and managers)</i> | 38 | 28 | 43 | 45 | 45 | 43 |
| <i>Employees in other positions</i> | 13 | 8 | 8 | 45 | 45 | 8 |
| Average training hours (by employee position) | | | | | | |
| <i>Employees in administrative positions</i> | 10 | 8 | 8 | 45 | 45 | 8 |
| <i>Employees in technical positions</i> <i>(ex. engineers, technicians)</i> | 5 | 3 | 3 | 45 | 45 | 3 |
| <i>Employees in manual labour positions</i> <i>(ex. field work, production, maintenance)</i> | 42 | 24 | 28 | 45 | 45 | 28 |
| Work-related injuries | | | | | | |
| Total number of hours worked | | | | | | |
| <i>employees</i> | 16969725 | 16787337 | 16587456 | 78300 | 113400 | 16779156 |
| <i>contractors</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| Total number of work-related injuries (employees) | | | | | | |
| <i>fatalities</i> | 2 | 0 | 4 | 0 | 0 | 4 |
| <i>high-consequence injuries (excluding fatalities)</i> | 0 | 1 | 0 | 0 | 0 | 0 |
| <i>recordable injuries</i> | 29 | 29 | 9 | 1 | 1 | 11 |
| Total number of work-related injuries (contractors) | | | | | | |
| <i>fatalities</i> | 2 | 2 | 0 | N/A | N/A | 0 |

| | | | | | | |
|---|---|---|---|-----|-----|---|
| <i>high-consequence injuries (excluding fatalities)</i> | 0 | 0 | 0 | N/A | N/A | 0 |
| <i>recordable injuries</i> | 1 | 2 | 0 | N/A | N/A | 0 |
| Work-related hazards that pose risk to injury | | | | | | |
| <i>physical (e.g., temperature extremes, constant loud noise, spills)</i> | 4 | 4 | 4 | 1 | 1 | 6 |
| <i>ergonomic (e.g., improperly adjusted workstations, vibrations)</i> | 2 | 2 | 3 | 0 | 0 | 3 |
| <i>chemical (e.g., exposure to solvents)</i> | 0 | 0 | 0 | 0 | 0 | 0 |
| <i>biological (e.g., exposure to blood and bodily fluids)</i> | 1 | 1 | 1 | 0 | 0 | 1 |
| <i>psychosocial (e.g., verbal abuse, harassment, related to work-organization (e.g., long hours, shift work))</i> | 1 | 1 | 0 | 0 | 0 | 0 |
| <i>For another, unspecified reason</i> | 2 | 2 | 1 | 0 | 0 | 1 |

Employee breakdown

Employee breakdown (by level)

| | | | | | | |
|--|------|------|------|----|----|------|
| Number of executives (includes board members and directors) | 31 | 31 | 40 | 0 | 0 | 40 |
| <i>males</i> | 25 | 24 | 32 | 0 | 0 | 32 |
| <i>under 30 years old</i> | 0 | 0 | 0 | 0 | 0 | 0 |
| <i>30-50 years old</i> | 21 | 19 | 23 | 0 | 0 | 23 |
| <i>over 50 years old</i> | 4 | 5 | 9 | 0 | 0 | 9 |
| <i>females</i> | 6 | 7 | 8 | 0 | 0 | 8 |
| <i>under 30 years old</i> | 0 | 0 | 0 | 0 | 0 | 0 |
| <i>30-50 years old</i> | 5 | 6 | 6 | 0 | 0 | 6 |
| <i>over 50 years old</i> | 1 | 1 | 2 | 0 | 0 | 2 |
| Number of employees in management (includes senior managers and managers) | 180 | 177 | 170 | 2 | 9 | 181 |
| <i>males</i> | 136 | 133 | 124 | 2 | 9 | 135 |
| <i>under 30 years old</i> | 5 | 5 | 4 | 0 | 0 | 4 |
| <i>30-50 years old</i> | 88 | 87 | 78 | 0 | 4 | 82 |
| <i>over 50 years old</i> | 43 | 41 | 42 | 2 | 5 | 49 |
| <i>females</i> | 44 | 44 | 46 | 0 | 0 | 46 |
| <i>under 30 years old</i> | 0 | 0 | 0 | 0 | 0 | 0 |
| <i>30-50 years old</i> | 33 | 30 | 33 | 0 | 0 | 33 |
| <i>over 50 years old</i> | 11 | 14 | 13 | 0 | 0 | 13 |
| Number of employees in other levels | 2844 | 2883 | 2825 | 27 | 33 | 2885 |
| <i>males</i> | 2156 | 2186 | 2093 | 25 | 30 | 2148 |
| <i>under 30 years old</i> | 220 | 219 | 189 | 6 | 9 | 204 |
| <i>30-50 years old</i> | 1257 | 1234 | 1167 | 14 | 20 | 1201 |
| <i>over 50 years old</i> | 679 | 733 | 736 | 5 | 1 | 742 |
| <i>females</i> | 688 | 697 | 732 | 2 | 3 | 737 |
| <i>under 30 years old</i> | 49 | 46 | 53 | 1 | 1 | 55 |
| <i>30-50 years old</i> | 444 | 446 | 459 | 0 | 2 | 461 |
| <i>over 50 years old</i> | 195 | 205 | 220 | 1 | 0 | 221 |
| Employee breakdown (by position) | | | | | | |
| Number of employees in administrative positions | 1654 | 1618 | 1588 | 4 | 3 | 1595 |
| <i>males</i> | 603 | 584 | 559 | 3 | 3 | 565 |
| <i>under 30 years old</i> | 81 | 60 | 38 | 0 | 1 | 39 |

| | | | | | | |
|--|-----------|-----------|---------|-----|---------|---------|
| <i>30-50 years old</i> | 368 | 368 | 345 | 2 | 2 | 349 |
| <i>over 50 years old</i> | 154 | 156 | 176 | 1 | 0 | 177 |
| <i>females</i> | 1051 | 1034 | 1029 | 1 | 0 | 1030 |
| <i>under 30 years old</i> | 117 | 104 | 83 | 1 | 0 | 84 |
| <i>30-50 years old</i> | 676 | 654 | 646 | 0 | 0 | 646 |
| <i>over 50 years old</i> | 258 | 276 | 301 | 0 | 0 | 301 |
| Number of employees in technical positions (ex. engineers, technicians) | 5244 | 5164 | 5186 | 7 | 10 | 5203 |
| <i>males</i> | 5066 | 4980 | 4990 | 6 | 8 | 5004 |
| <i>under 30 years old</i> | 687 | 612 | 540 | 0 | 2 | 542 |
| <i>30-50 years old</i> | 2167 | 2135 | 2112 | 5 | 5 | 2122 |
| <i>over 50 years old</i> | 2212 | 2234 | 2338 | 1 | 1 | 2340 |
| <i>females</i> | 179 | 185 | 196 | 1 | 2 | 199 |
| <i>under 30 years old</i> | 9 | 10 | 15 | 0 | 1 | 16 |
| <i>30-50 years old</i> | 63 | 66 | 68 | 0 | 1 | 69 |
| <i>over 50 years old</i> | 107 | 109 | 113 | 1 | 0 | 114 |
| Number of employees in manual labour positions (ex. production, maintenance) | 1756 | 1763 | 1718 | 16 | 20 | 1754 |
| <i>males</i> | 1577 | 1578 | 1509 | 16 | 19 | 1544 |
| <i>under 30 years old</i> | 181 | 179 | 164 | 6 | 6 | 176 |
| <i>30-50 years old</i> | 866 | 838 | 790 | 7 | 13 | 810 |
| <i>over 50 years old</i> | 529 | 560 | 555 | 3 | 0 | 558 |
| <i>females</i> | 180 | 186 | 209 | 0 | 1 | 210 |
| <i>under 30 years old</i> | 2 | 1 | 2 | 0 | 0 | 2 |
| <i>30-50 years old</i> | 67 | 71 | 86 | 0 | 1 | 87 |
| <i>over 50 years old</i> | 111 | 114 | 121 | 0 | 0 | 121 |
| Number of employees with disabilities | 71 | 79 | 80 | 0 | 0 | 80 |
| Donations (EUR) | | | | | | |
| Total monetary value contributed | 2 675 009 | 5 193 909 | 398 380 | N/A | 286 524 | 398 380 |
| <i>donations</i> | 2 458 282 | 86 005 | 230 460 | N/A | 122 729 | 230 460 |
| <i>other</i> | 216 727 | 5 107 904 | 168 614 | N/A | 163 795 | 168 614 |
| Laws and regulations compliance (in the social and economic area) | | | | | | |
| Significant fines and non-monetary sanctions for non-compliance with social and economic area in terms of: | | | | | | |
| <i>total monetary value of significant fines</i> | 322 642 | 198 486 | 270 836 | N/A | 15 625 | 270 836 |
| <i>total number of non-monetary sanctions</i> | 10 | 1 | 3 | N/A | N/A | 3 |
| <i>cases brought through dispute resolution mechanisms</i> | 27 | 8 | 6 811 | N/A | N/A | 6 811 |

10.2. GRI Content Index

This report has been prepared in accordance with the GRI Standards Core option.

Table 11: GRI Content Index¹⁸.

| GRI Standard | Section(s), page(s) and/or URL(s), description |
|---|--|
| GRI 100 – Universal standards 2016 | |
| GRI 101: Foundation 2016 | |
| Reporting Principles for defining report content and report quality | Stakeholder Inclusiveness Sustainability Context Materiality Completeness Accuracy Balance Clarity Comparability Reliability Timeliness |
| GRI 102: General Disclosures | |
| Organisational profile | |
| 102-1 Name of organisation | ENERGO - PRO a.s. |
| 102-2 Activities, brands, products and services | Our business |
| 102-3 Location of headquarters | Where we operate |
| 102-4 Location of operations | Where we operate |
| 102-5 Ownership and legal form | Organisational structure |
| 102-6 Markets served | Where we operate, Organisational structure |
| 102-7 Scale of organisation | Annual report , Data tables |
| 102-8 Information on employees and other workers | Data tables, Social, Social, Social, Social, Social |
| 102-9 Supply chain | Supply chain |
| 102-10 Significant changes to the organisation and its supply chain | Supply chain |
| 102-11 Precautionary Principle or approach | Governance |
| 102-12 External initiatives | ESG commitments |
| 102-13 Membership of associations | ESG commitments |
| Strategy | |
| 102-14 Statement from senior decision-maker | Error! Reference source not found. |
| Ethics and Integrity | |
| 102-16 Values, principles, standards, and norms of behaviour | Our business, Legal compliance, ethics, and transparency |
| 102-18 Governance structure | Governance structure |
| Stakeholder Engagement | |
| 102-40 List of stakeholder groups | Stakeholder engagement |
| 102-41 Collective bargaining agreements | Social, Social, Social, Social, Social |
| 102-42 Identifying and selecting stakeholders | Stakeholder engagement |
| 102-43 Approach to stakeholder engagement | Stakeholder engagement |

¹⁸ EP's non-material GRI Disclosures were omitted. Where possible we provide further description.

| | |
|---|--|
| 102-44 Key topics and concerns raised | Stakeholder engagement |
| Reporting Practice | |
| 102-45 Entities included in the consolidated financial statements | Annual report , Methodology, Report structure and boundaries Error! Reference source not found.. |
| 102-46 Defining report content and topic Boundaries | Reporting, Materiality assessment, Methodology This Report was drafted in accordance with GRI reporting principles for defining report content and report quality |
| 102-47 List of material topics | Materiality assessment |
| 102-48 Restatements of information | Not applicable - this is the first report |
| 102-49 Changes in reporting | Not applicable - this is the first report |
| 102-50 Reporting period | January 1, 2021, to December 31, 2021 |
| 102-51 Date of most recent report | Not applicable - this is the first report |
| 102-52 Reporting cycle | Annual |
| 102-53 Contact point for questions regarding the report | Catherine Garcia, ES Group Head |
| 102-54 Claims of reporting in accordance with the GRI Standards | This report has been prepared in accordance with the GRI Standards: Core option |
| 102-55 GRI content index | GRI Content Index Error! Reference source not found. Error! Reference source not found. |
| 102-56 External assurance | The report did not obtain external assurance |
| GRI 103: Management Approach 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| GRI 200 – Economic standards 2016 | |
| GRI 201: Economic Performance 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 201-1 Direct economic value generated and distributed | Annual report |
| 201-3 Defined benefit plan obligations and other retirement plans | The Company does not have any defined benefit compensation plans. |
| 201-4 Financial assistance received from government | Annual report |

| | |
|--|---|
| GRI 203: Indirect Economic Impacts 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 203-1 Infrastructure investments and services supported | Energy supply services, road infrastructure investment and community infrastructure (in cases of resettlement) |
| GRI 205: Anti-corruption 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 205-1 Operations assessed for risks related to corruption | The ABC/AML Policy has been designed to address and mitigate the risks of bribery and money laundering. An assessment was done to determine the risk areas. All new projects since 2019 have undergone this assessment. |
| 205-2 Communication and training about anti-corruption policies and procedures | Communication and training provided to all employees, including all line training. Senior management are required to pass an online questionnaire. |
| GRI 300 – Environmental standards 2016 | |
| GRI 302: Energy 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 302-1 Energy consumption within the organisation | Data tables |
| 302-2 Energy consumption outside of the organisation | Data tables |
| 302-3 Energy intensity | Not relevant for our HPP operations - omitted |
| GRI 303: Water and Effluents 2018 | |

| | |
|--|--|
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 303 -1 Interactions with water as a shared resource | Water use, Water management, Water management In every BU section, we highlight our HPP facilities on the water stress map. We use data from World Recourse Institute available online on Water Risk Atlas website. |
| 303-2 Management of water discharge-related impacts | Water use, Water management, Water management |
| 303-3 Water withdrawal | Data tables Partially disclosed: limitations are presented in Methodology. |
| 303-4 Water discharge | Data tables Partially disclosed: limitations are presented in Methodology. |
| 303-5 Water consumption | Data tables Partially disclosed: limitations are presented in Methodology. |
| GRI 304: Biodiversity 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency, Biodiversity and Natural Resources, Biodiversity & Natural Resources, Biodiversity and Natural Resources, Biodiversity and Natural Resources |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency, Biodiversity and Natural Resources, Biodiversity & Natural Resources, Biodiversity and Natural Resources, Biodiversity and Natural Resources |

| | |
|---|--|
| 304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas | Biodiversity and Natural Resources, Biodiversity & Natural Resources, Biodiversity and Natural Resources, Biodiversity and Natural Resources Partially disclosed. We plan to disclose more information in the upcoming years. |
| 304-2 Significant impacts of activities, products, and services on biodiversity | Biodiversity and Natural Resources, Biodiversity & Natural Resources, Biodiversity and Natural Resources, Biodiversity and Natural Resources Partially disclosed. We plan to disclose more information in the upcoming years. |
| 304-3 Habitats protected or restored | Data partially available. Restoration. Restoration process for Alpaslan is on-going, currently approximately 16 ha restored. Other sites work is planned for 2022/2023. Most of the sites were existing projects where the restoration had already been completed. |
| GRI 305: Emissions 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 305-1 Direct (Scope 1) GHG emissions | 17 |
| 305-2 Energy indirect (Scope 2) GHG emissions | 17 |
| 305-3 Other indirect (Scope 3) GHG emissions | 17 |
| 305-6 Emissions of ozone depleting substances (ODS) | Not applicable: Our operations focus on hydropower and electricity transmission and distribution. |
| 305-7 Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions | Not applicable: Our operations focus on hydropower and electricity transmission and distribution. |
| GRI 306: Effluents and Waste 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 306-4 Transport of hazardous waste | Hazardous waste is transported to a third party. |

| | |
|--|--|
| 306-5: Water bodies affected by water discharges and/or runoff | Water use, Water management, Water management Partially disclosed: The information is provided for our most impactful facilities. |
| GRI 307: Environmental Compliance 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 307-1 Non-compliance with environmental laws and regulation | Data tables No significant fines or monetary sanctions. |
| GRI 400 – Social standards 2016 | |
| GRI 401: Employment 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 401-1 New employee hires and employee turnover | Social, Social, Social, Social, Social |
| 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees | Employee development, Employee Development, Employee development, Employee development |
| 401-3 Parental leave | Employee development, Employee Development, Employee development, Employee development |
| GRI 403: Occupational Health and Safety 2018 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Error! Reference source not found. |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 403-2 Hazard identification, risk assessment, and incident investigation | Health & safety, Health & safety, Health and Safety, Health and safety, Health and safety |
| 403-5 Worker training on occupational health and safety | Employee development, Employee Development, Employee development, Employee development |

| | |
|---|--|
| 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships | Health & safety, Health & safety, Health and Safety, Health and safety, Health and safety |
| 403-9 Work-related injuries | Data tables |
| 403-10 Work-related ill health | EP does not operate in locations with high risk incidence of diseases. |
| GRI 404: Training and Education 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 404-1 Average hours of training per year per employee | Data tables |
| 404-2 Programs for upgrading employee skills and transition assistance programs | Employee development, Employee Development, Employee development, Employee development |
| GRI 405: Diversity and Equal Opportunity 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 405-1 Diversity of governance bodies and employees | Governance structure, Data tables |
| 405-2 Ratio of basic salary and remuneration of women to men | Information unavailable: We plan to disclose this information next year. |
| GRI 406: Non-discrimination 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 406-1 Incidents of discrimination and corrective actions taken | We have not received any communication with respect to incidents relating to potential situations of discrimination. |
| GRI 408: Child Labour 2016 | |

| | |
|---|--|
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 408-1 Operations and suppliers at significant risk for incidents of child labour | No suppliers pose a significant risk of child labour. Our policies have clauses regarding the interdiction of child labour and all our suppliers are required to comply with our policies. |
| GRI 413: Local Communities 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 413-1 Operations with local community engagement, impact assessments, and development programs | All operational sites constructed by EP had ESIA's including stakeholder engagement identifying relevant impacts. A company's Grievance Mechanism Standard and Stakeholder Engagement Standard will be prepared in 2022. All operational sites will be required to have fit for purpose plans. |
| 413-2 Operations with significant actual and potential negative impacts on local communities | Turkish Karakurt project required economic resettlement, Turkish Alpaslan project required both economic and physical resettlement and in Colombian project only one household will be physically displaced. |
| GRI 416: Customer Health and Safety 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services | We have not identified any non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services in 2019, 2020 nor 2021. |
| GRI 418 Customer Privacy 2016 | |

| | |
|--|--|
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data | None. |
| GRI 419: Socioeconomic Compliance 2016 | |
| 103-1 Explanation of the material topic and its Boundary | Reporting, Materiality assessment, Methodology, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis, Materiality analysis |
| 103-2 The management approach and its components | Our business, Legal compliance, ethics, and transparency |
| 103-3 Evaluation of the management approach | Our business, Legal compliance, ethics, and transparency |
| 419-1 Non-compliance with laws and regulations in the social and economic area | No significant fines or non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area were received in 2019, 2020 and 2021. |