



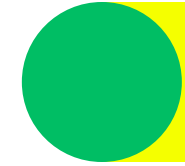
**Qenergy**

## **ESG Report 2025**

This report works best in its digital form.  
We encourage viewing or sharing it online to minimise environmental impact.

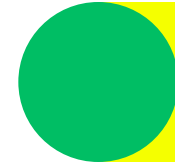
February 2026

# Table



<b>3</b>	<b>Letter from the CEO</b>	<b>52</b>	<b>Governance</b>
<b>4</b>	<b>Our Business</b>	52	Business Conduct
4	Our Strategy, Business Model, and Value Chain	58	Information Security
6	Stakeholder Engagement	<b>62</b>	<b>About the Report</b>
8	ESG Management and Material Topics	62	General Basis for Preparation of Sustainability Statements
<b>11</b>	<b>Environment</b>	65	Other ESG Disclosures at a Glance
11	Environmental Management	66	Glossary of Terms and Abbreviations
13	Climate Change	67	SDG Content Index
19	Biodiversity and Ecosystems	68	VSME Content Index
26	Resource Use and Circular Economy		
<b>31</b>	<b>Social</b>		
31	Own Workforce		
44	Workers in the Value Chain		
47	Affected Communities		
50	Corporate Social Responsibility (CSR)		

# Letter from the CEO



2025 is another year of change for our markets. While Europe continues to face economic headwinds, rising competition, and deeper renewable penetration, the transition to green energy is moving forward at pace. For QENERGY, this means not only delivering competitive projects but also adapting with agility — by accelerating hybridisation, strengthening our ability to respond to demand, and ensuring the financing needed to turn our ambitions into reality.

With an active development pipeline of 8.2 GW across solar, wind, and storage, we have already reached important milestones this year. Among them, our partnership with Velto Renewables, backed by the global investment group La Caisse, marks a significant step in expanding our large-scale renewable portfolio across Europe.

As we grow, we are equally conscious of how we grow. Sustainability remains at the heart of QENERGY. Our purpose — to empower a sustainable world with green energy — guides us to make a positive impact in the regions where we work. From hybrid solar-and-storage projects and dual-use solar farms in Spain, to repowering and floating solar in France, we are embedding innovation while supporting climate resilience and local communities. Our teams are also preparing for the next chapter of Europe's energy transition by continuing to explore new solutions.

In 2025, we made progress in three key areas of our sustainability journey:

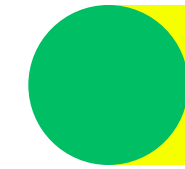
- Climate action, by striving for ISO 14001 certification for our Iberian operations and completing our first group-wide greenhouse gas (GHG) footprint.
- Governance, by publishing our Anti-Bribery and Anti-Corruption Policy and Anti-Discrimination Directive.
- Responsible supply chains, by building stronger in-house expertise and enhancing cooperation on supplier environmental, social, and governance (ESG) reviews.

On the reporting side, ESG has become even more integrated with company management. We continue to align with evolving EU regulations and engage closely with our investors and shareholders to understand their expectations and priorities.

Our path forward is clear: to lead the energy transition with responsibility and agility. This report is part of that journey. I truly appreciate your trust and commitment as we continue building a sustainable future together.

Yours sincerely,  
Junu Lee

# Our Business



## Our Strategy, Business Model, and Value Chain

**QENERGY is Europe's green provider of energy project solutions — a reliable partner for communities and landowners, construction professionals, investors and off-takers. Together, we aim to drive the energy transition forward.**

QENERGY runs an active development pipeline of 8.2 GW of renewable energy projects across Spain, Portugal, France and Germany. Our business portfolio spans from solar power plants to onshore wind farms and offshore wind projects, to battery energy storage solutions and green hybrid power plants utilising a combination of technologies.

QENERGY's green energy projects are at various stages of development. These range from greenfield development and permitting to projects that are ready to be built, under construction, or already in operation. To date, QENERGY has realised 2.8 GW of renewable energy projects and has 1.3 GW under construction.

### Technology



**Utility Solar**



**Onshore Wind**



**Energy Storage**

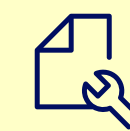


**Offshore Wind**



**Green Hydrogen**

### Services



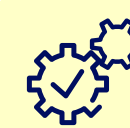
**Development**



**EPC**



**O&M**



**Asset Management**

### Investments & Transactions



**Asset Sell Down / IPP**



**Project Finance & PPA**



**Strategic M&A**



**Green / Hybrid Bond**

QENERGY key business

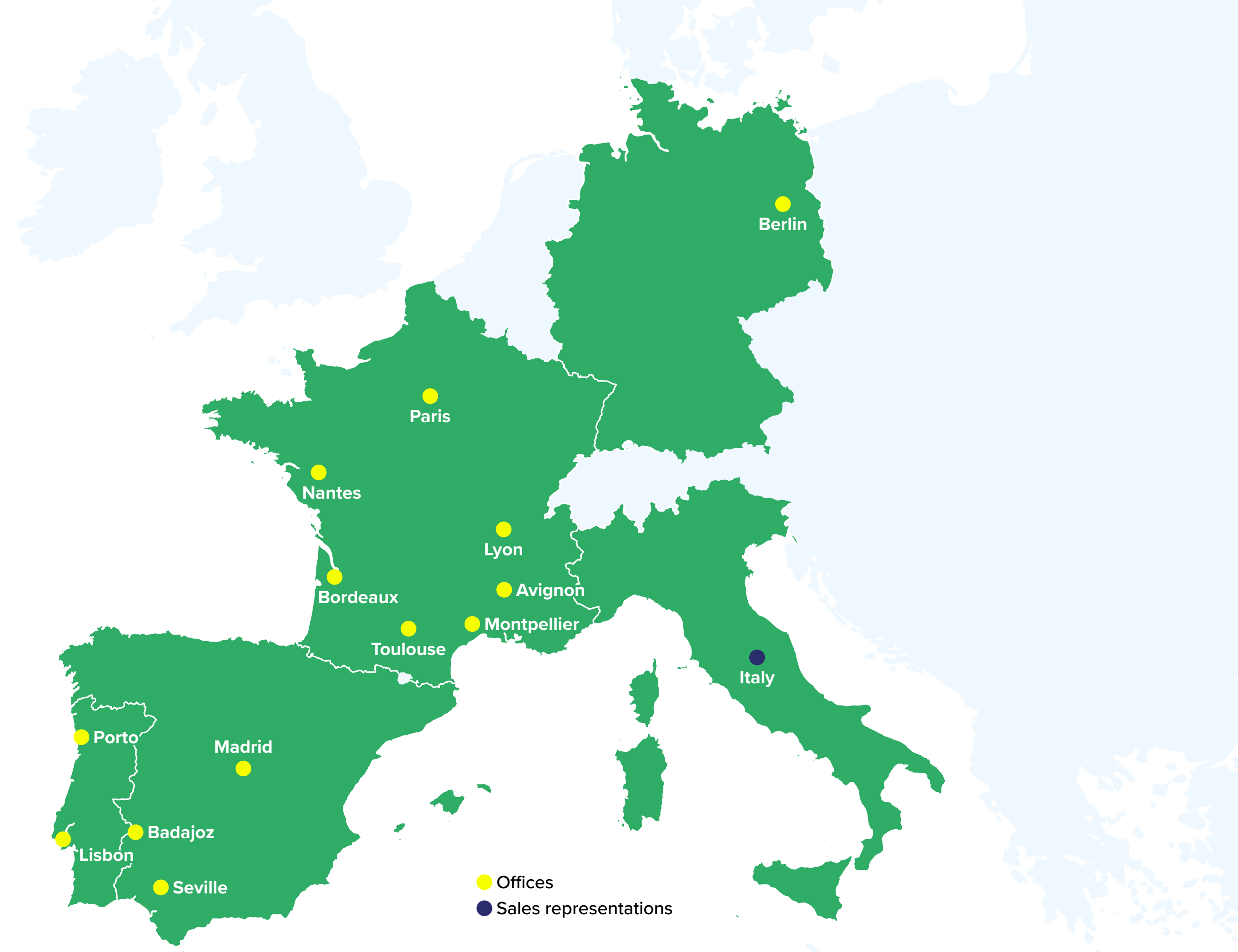
## Our Business

### Building Strong Bonds: QENERGY's unified family

In early 2022, we took the strength and PV-downstream experience of the German solar pioneer Qcells, while also incorporating the expertise of a recently acquired company in France. Our French division had been successfully developing wind and solar projects under the RES Group for over 25 years. Together, we formed QENERGY and officially launched the new company on 1 July 2022.

QENERGY is now headquartered in Berlin and has offices in Spain, France and Portugal — specifically Madrid, Badajoz, Seville, Avignon, Paris, Montpellier, Lyon, Bordeaux, Nantes, Toulouse, Porto, and Lisbon. We are a unified team, only legally structured as the holding company QENERGY Solutions SE, along with two subsidiaries: QENERGY Europe GmbH and QENERGY France SAS. For more information about our employees, please refer to the *Own Workforce* subchapter.

QENERGY belongs to the energy division of the Korean [Hanwha Solutions Corporation](#), a flagship company of the Global Fortune 500 enterprise [Hanwha Group](#). Hanwha is engaged in a broad range of sustainable energy innovations and ecologically smart initiatives to lead global efforts towards a green and carbon-neutral era. These initiatives are described in greater detail in Hanwha Solutions Corporation's [2025 Sustainability Report](#).



Berlin office



Madrid office



Avignon office

# Stakeholder Engagement

## Interests and Views of Stakeholders

Our stakeholder engagement spans the entire value chain of our renewable energy projects, fostering trust-based long-term relationships, and aiming for mutually beneficial outcomes. We provide comprehensive and regular updates on the company’s operations, strategy, and ESG performance while actively listening to feedback and responding to concerns. Clear roles and responsibilities are established for QENERGY’s stakeholder engagement, ensuring that stakeholder views are taken seriously and integrated into the company’s overall management process. Examples of these engagements are detailed in the *Own Workforce*, *Workers in the Value Chain*, *Affected Communities*, and *Corporate Social Responsibility (CSR)* subchapters.

Stakeholder group	Engagement approach
Employees	<ul style="list-style-type: none"> <li>• Direct dialogues with the Human Resources (HR) Office</li> <li>• Employee surveys</li> <li>• Town hall meetings</li> <li>• Works Council mailbox and meetings</li> <li>• Whistleblowing reporting channel</li> <li>• Performance review and goal setting</li> <li>• Internal communication platforms</li> <li>• CSR activities</li> </ul>
Buyers and Investors	<ul style="list-style-type: none"> <li>• Direct dialogues with the Investment Division</li> <li>• Investor road shows</li> <li>• Investor due diligence</li> <li>• Corporate reporting</li> </ul>
Subcontractors	<ul style="list-style-type: none"> <li>• Direct dialogues with the Engineering, Procurement and Construction (EPC) Division, and Quality, Health, Safety and Environment (QHSE) and Asset Management Departments</li> <li>• Whistleblowing reporting channel</li> <li>• Supplier due diligence</li> <li>• Industry events</li> </ul>
Suppliers	<ul style="list-style-type: none"> <li>• Direct dialogues with the EPC Division</li> <li>• Whistleblowing reporting channel</li> <li>• Supplier due diligence</li> <li>• Industry events</li> </ul>
Local governments and communities	<ul style="list-style-type: none"> <li>• Direct dialogues with the Development and EPC Divisions</li> <li>• Public meetings and consultations</li> <li>• Grievance mechanism</li> <li>• Corporate reporting</li> <li>• Local initiatives and partnerships</li> </ul>
Regulators	<ul style="list-style-type: none"> <li>• Direct dialogues with the Public Affairs Department</li> <li>• Industry conferences and associations</li> <li>• Response to public consultations on new regulations</li> </ul>

### Participation in Industry Dialogue, Political Influence and Lobbying

We are members of several industry associations that help shape industry standards and practices in collaboration with our peers. These include:

- France: France Renouvelables, Syndicat des Energies Renouvelables, Plateforme Verte, Cemater, France Hydrogène;
- Spain: Union Española Fotovoltaica, Asociación Empresarial Eólica, Asociación de Empresas de Energías Renovables, Asociación Empresarial de Pilas, Baterías y Almacenamiento Energético;
- Germany: Bundesverband Solarwirtschaft, Bundesverband Windenergie, European Clean Hydrogen Alliance, Bundesverband Energiespeicher Systeme e.V.

In addition to our association membership, we actively participate in trade fairs and industry events to foster knowledge sharing and showcase our sustainable practices.

We ensure that all interactions with public officials are transparent and comply with applicable laws. In line with our [Code of Conduct](#), we prohibit political donations to individuals, parties, or any affiliated organisations.

While we do not have a dedicated Public Affairs function in other operations, our Public Affairs Department in France is involved in lobbying by engaging with regional and national regulatory bodies on topics such as agriculture, energy, public finance, and the environment. In line with French transparency regulations, we disclose our company profile, lobbying activities, and expenditures to public decision-makers annually through the High Authority for Transparency in Public Life [website](#), which is publicly accessible and subject to audit.

# ESG Management and Material Topics

We aim to empower a sustainable world with green energy. It's what makes us proud and drives us every day. In line with our purpose, we actively manage the ESG aspects of our company.

## ESG Frameworks

Our ESG strategy is shaped by regulatory developments, leading frameworks, and investor expectations. The ESG workstream actively monitors regulatory and industry updates while compiling and analysing ESG requests from buyers and investors, with findings reported directly to the CEO and Group General Counsel.

For our ESG reporting framework, in 2024, we conducted a dry run, voluntarily structuring our reporting in line with the European Sustainability Reporting Standards (ESRS). This year brought both progress and challenges, particularly amid the fast-evolving reporting landscape and the arrival of the EU Omnibus proposal.

Given the uncertainty around the timing and scope of the Corporate Sustainability Reporting Directive (CSRD) during the report preparation, we prioritised a practical

approach by combining the Voluntary Sustainability Reporting Standard for Non-listed Micro-, Small-, and Medium-sized Enterprises (VSME) with key investor expectations. This allowed us to maintain continuity and relevance while keeping our reporting future-ready for potential upcoming CSRD compliance.

However, we remained committed to using the CSRD as the foundation of our ESG framework and made several notable advances:

- High-level alignment with the VSME, recommended by the European Commission for companies outside the CSRD scope, as detailed in the *VSME Content Index* subchapter;
- Strengthened transparency in response to investor requests, typically guided by frameworks such

as the United Nations Sustainable Development Goals (UN SDGs), Sustainable Finance Disclosure Regulation (SFDR), United Nations Global Compact (UNGC) Principles, and the Equator Principles;

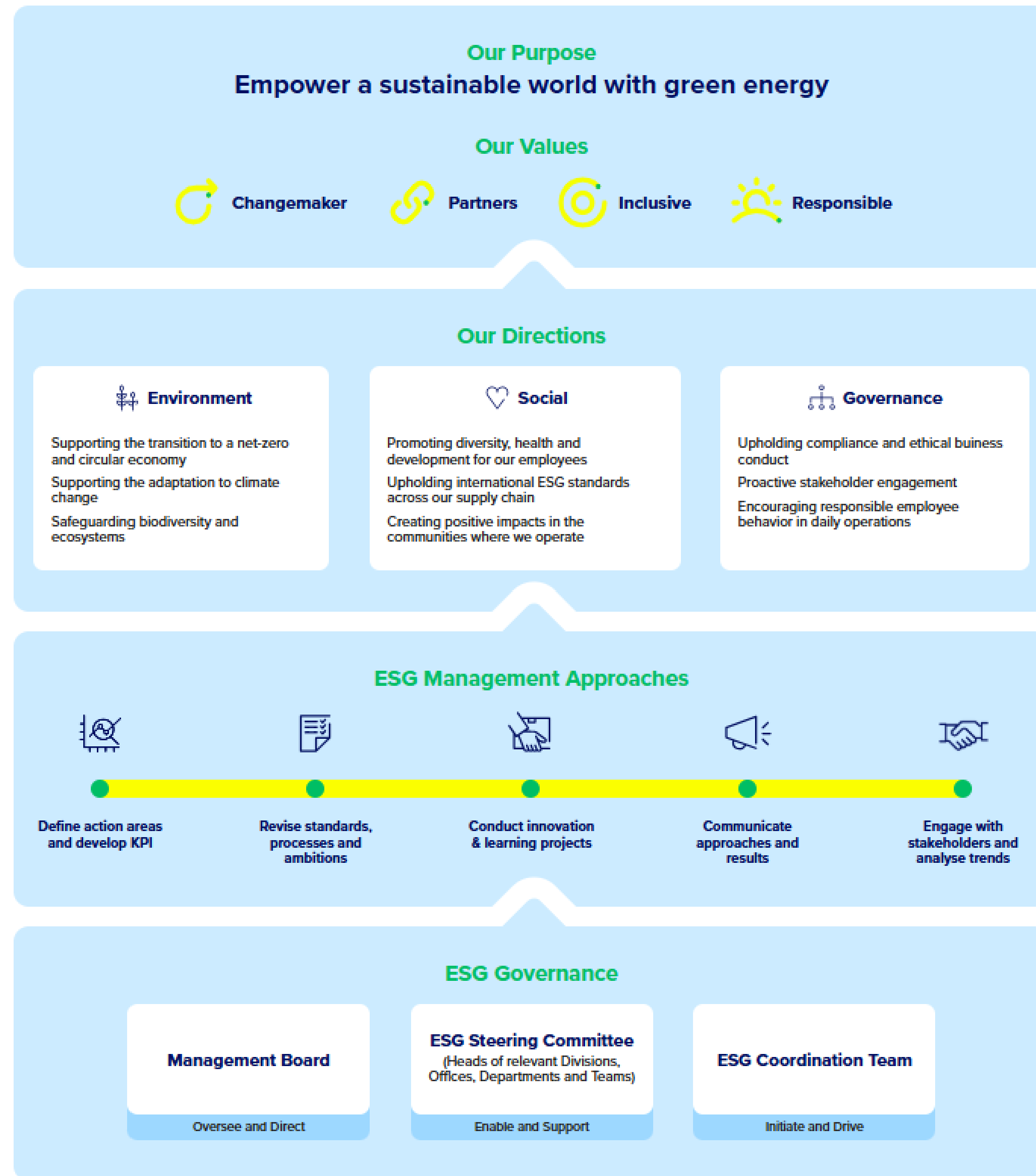
- Significantly enhanced alignment with the GHG Protocol, as detailed in the *Climate Change* subchapter.

Frameworks we consider:



## ESG Governance

We strive to maintain a consistent management approach for each ESG dimension. This is why a dedicated ESG function was established when QENERGY was founded in 2022. We have set up an ESG governance structure coordinated by our ESG workstream. Senior management and business units are engaged to support the implementation of measures and the review of results. The Board, including the CEO, regularly reviews the progress of priority projects, key indicators, selected trends, and programme direction.

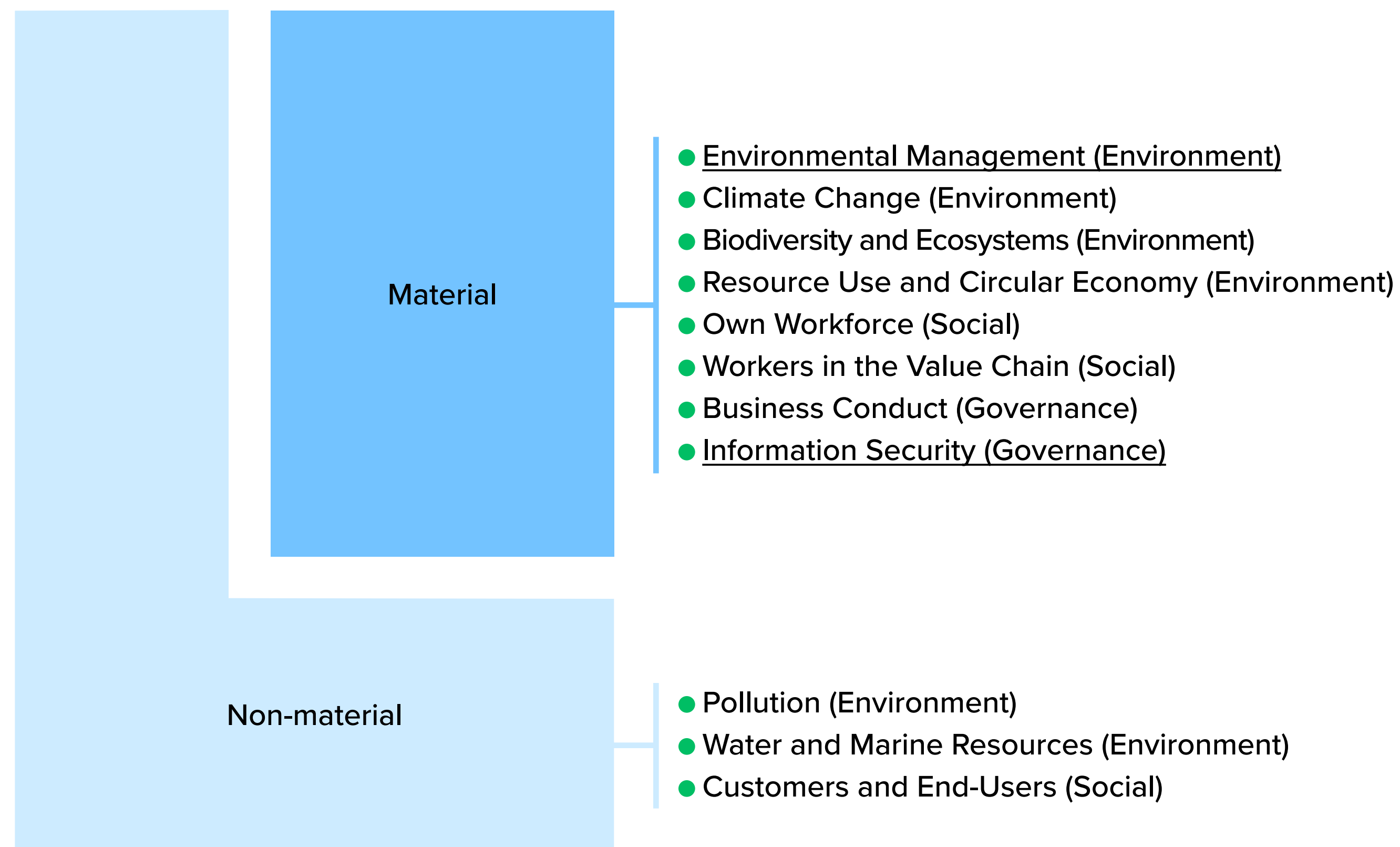


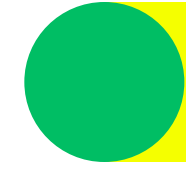
## Double Materiality Assessment

In addition to our overarching ESG directions, specific topics — ESG impacts, risks, and opportunities — are identified based on both their impact on our business and the impact of our business on the environment and society. This dual perspective was formalised through our first *Double Materiality Assessment (DMA)* in 2024. For more details, please refer to the *Processes to Identify & Assess Material Impacts, Risks & Opportunities* subchapter in our [ESG Report 2024](#).

This year, while the overall outcome of our materiality topics remains consistent, an in-depth review was conducted by the CEO, Group General Counsel, and ESG workstream. The review was informed by a comprehensive analysis of investor requests, internal team interviews, regulatory updates, and key ESG trends within the renewable energy sector.

As a result, two new topics, *Environmental Management* and *Information Security*, have been classified as material. In line with our approach, we continue to prioritise the monitoring and reporting of material topics, while also tracking non-material topics internally and preparing to report on them publicly should their relevance increase over time.





## Environmental Management

### POLICY

The QHSE Policy establishes our fundamental commitments to the environment and climate, both crucial aspects of our operations. This policy is communicated to all members of our company and is available to all interested parties upon request.

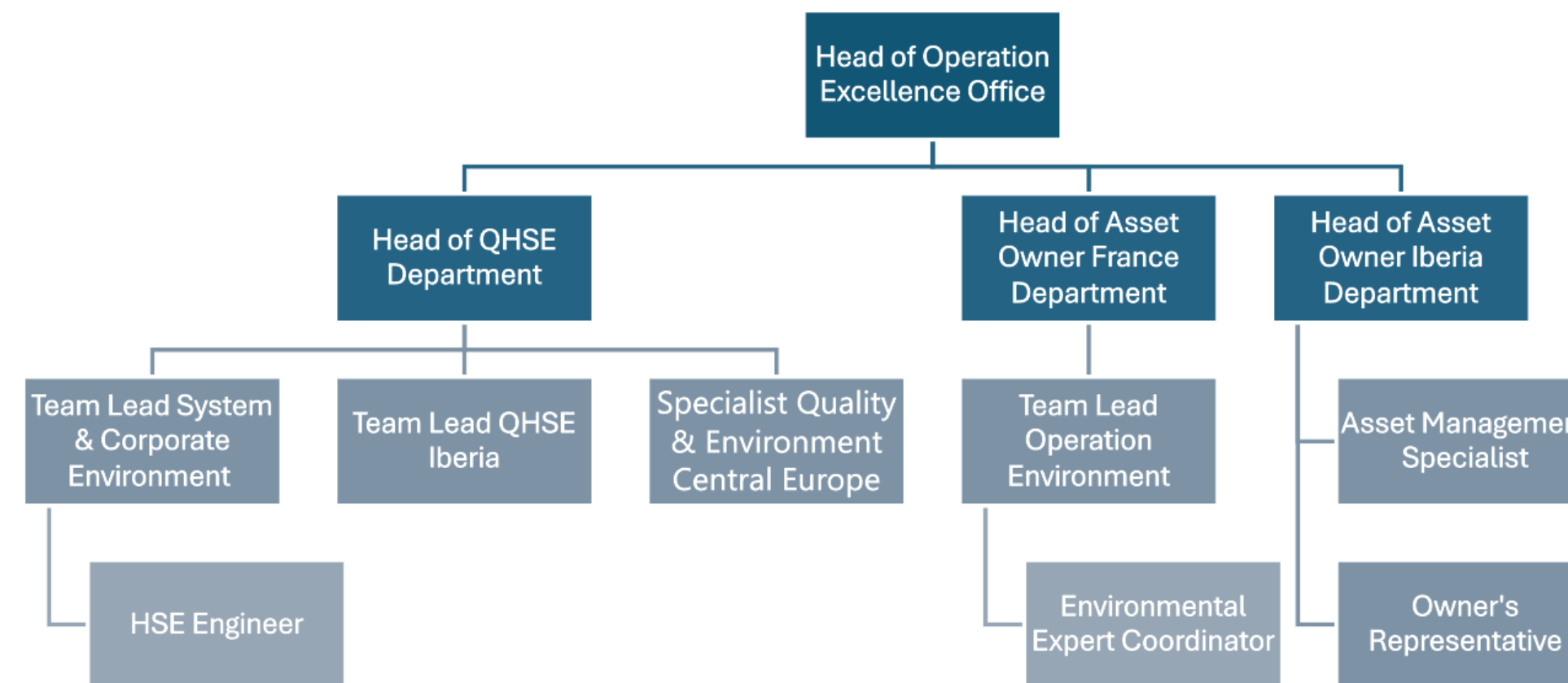
## Practice

Environmental management is at the core of our operations, and we comply with all applicable QHSE laws, regulations, and standards in all countries where we operate.

At the entity level, we have an ISO 14001-certified Environmental Management System covering all activities in France. At the project level, dedicated internal and external environmental coordinators translate all environmental requirements into Environmental Management Plans (EMPs). They ensure compliance with impact mitigation measures, coordinate responses to non-conformities and environmental incidents, and set up contingency plans designed to prevent, mitigate, and control serious environmental damage. Over the past years, a dedicated environmental data collection system has been set up, revised, and improved through collaboration with our subcontractors. Where possible, environmental data templates or reporting requirements are included in the EPC and Operations and Maintenance (O&M) contracts with subcontractors, with the aim to standardise and streamline the process. To further support effective environmental management, each project has incorporated a potential increase in both operational expenditure (OPEX) and capital expenditure (CAPEX) into its financial model to reflect the

anticipated costs of environmental mitigation and compensation. This proactive approach ensures that sufficient resources are available to address potential environmental impacts throughout the project lifecycle.

We promote a culture of compliance and accountability at all levels of our organisation. The staff organisational chart for environmental management within the QHSE function is shown below. In parallel, environmental experts in the Development Division work with external consultants to support environmental assessments and permitting throughout the project development phase.



Organisational chart on environmental management

## Metrics

**97%**  
of projects in construction have a dedicated EMP

Methodological notes: The coverage is due to one project where the authorities did not require an EMP.

## Future initiatives

As part of the Group's efforts to centralise and strengthen environmental management, QENERGY plans to implement a pan-European Environmental Management System in line with ISO 14001 standards. The rollout will be phased, with Portugal targeted for certification by 2026.

# Climate Change

## **POLICY**

Under the QHSE Policy, regardless of the positive impact that our renewable energy projects are already creating for the environment and the climate, we are committed to further minimising our carbon footprint. We also encourage our partners and suppliers to adopt similar practices to support the transition to a low-carbon economy.

## Climate Risk Assessment

Preparation for climate risk assessments is currently underway across all markets, in collaboration between the QHSE Department and external consultants. The assessments will identify and assess key physical and transition risks related to climate change across different time horizons. The first comprehensive results are expected by early 2026.

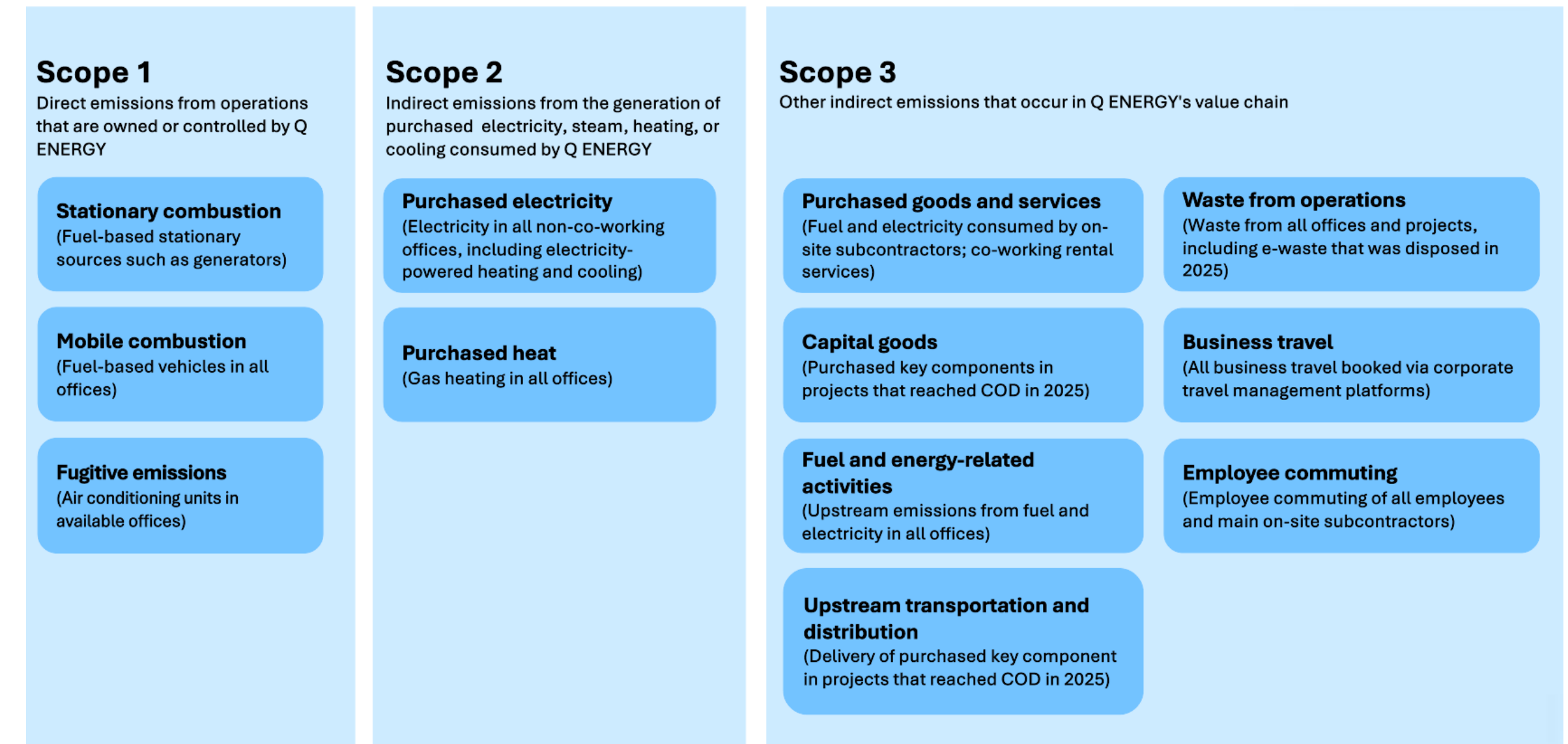
## Emissions and Energy

### Practice

QENERGY continues to support the transition to a low-carbon economy through the development of renewable energy assets. The projects we constructed and brought into operations (commercial operation date, COD) in 2025 are estimated to avoid approximately 375,580 tCO<sub>2</sub>e in greenhouse gas emissions over their operational lifetime.

2025 also marked a significant milestone in our sustainability strategy. Building on the foundation set in 2024, we calculated our Group-level corporate carbon footprint for the first time, covering Scope 1, Scope 2, and key Scope 3 categories in accordance with the GHG Protocol. We apply the operational control approach to define our organisational boundary and include all six greenhouse gas categories covered by the Kyoto Protocol: CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>.

When assessing our corporate carbon footprint, we focus not only on accurately allocating data to each emissions category, but also on monitoring and improving data quality and availability over time. The following emissions overview aims to provide a transparent view of our current calculation scope and serves as a foundation for ongoing improvement.



Emissions calculation scope for 2025

# Environment

**Scope 1** emissions stem from *Mobile combustion* (company vehicles) and *Fugitive emissions* (refrigerants from office air conditioning units). In 2025, an important milestone was reached in our French offices with the launch of a programme to transition company vehicles to electric models as existing leases expire, starting in October 2025.

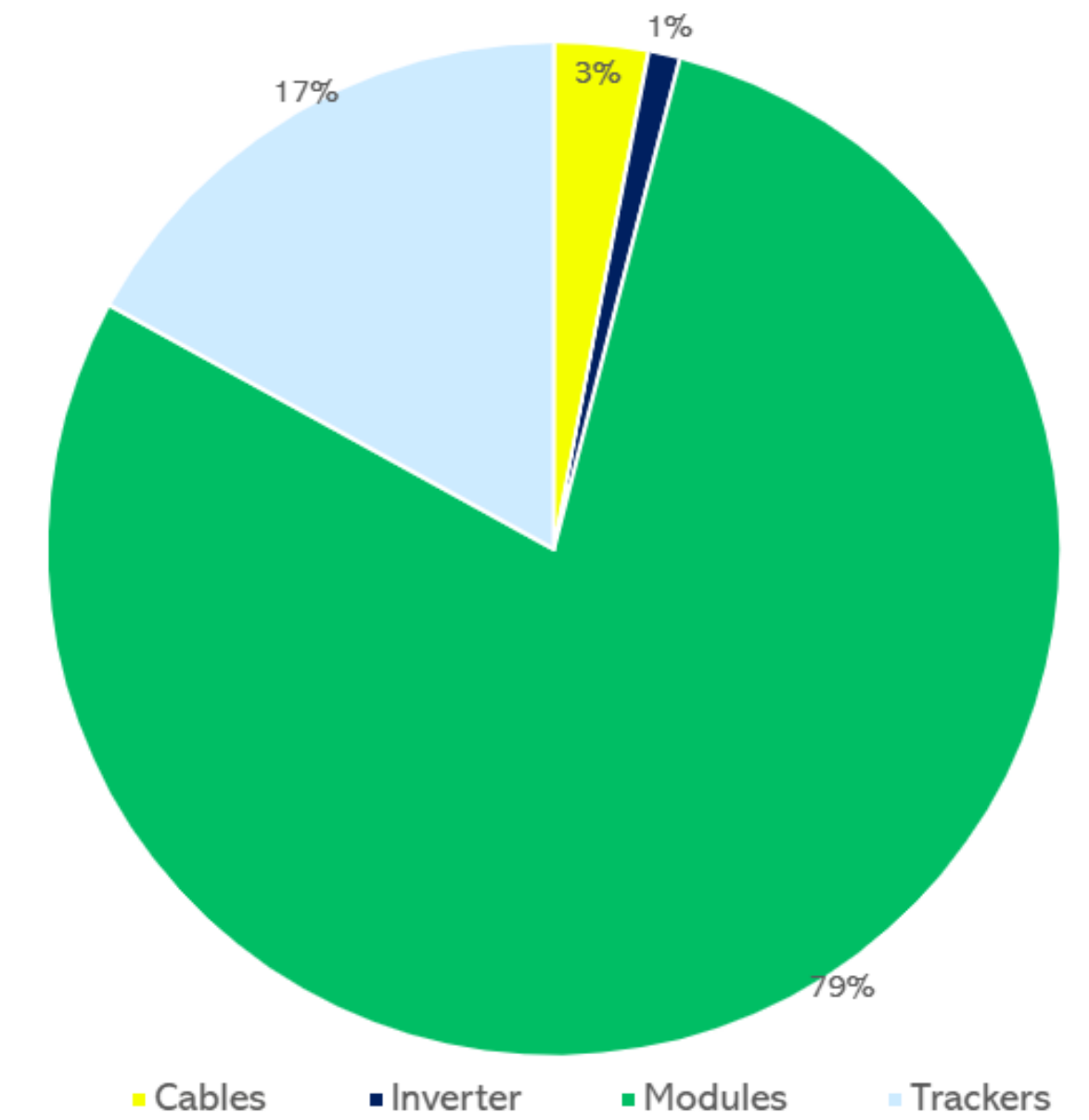
**Scope 2** emissions result from *Purchased electricity* (including electricity-powered heating and cooling) and *Purchased heat* used for office operations. Notably, our French and Madrid offices recorded the lowest emissions, as they are powered entirely by renewable energy. Efforts to reach 100% renewable electricity are ongoing, with the Berlin office having completed its transition in September. The Avignon office also improved energy efficiency through programmable plugs that cut power to equipment when not in use — a measure being tested for potential rollout to other offices. Green office practices implemented across our locations are illustrated on the right:

	Office renewable electricity	Automatic light sensors
<b>Berlin</b>	100%	Yes
<b>Avignon</b>	100%	Yes
<b>Paris</b>	100%	Yes
<b>Nantes</b>	100%	No
<b>Lyon</b>	-	Yes
<b>Bordeaux</b>	100%	Yes
<b>Toulouse</b>	100%	Yes
<b>Montpellier</b>	100%	Yes
<b>Madrid</b>	100%	Yes
<b>Seville</b>	75%	Yes
<b>Badajoz</b>	40.5%	Partly
<b>Porto</b>	0%	No
<b>Lisbon</b>	-	Yes

Office sustainability practices addressing Scope 2 emissions

**Scope 3** emissions cover all other indirect emissions across the value chain, with seven significant categories assessed this year. Consistent with our 2024 ESG Report, Scope 3 remains the largest contributor to our corporate carbon footprint, representing over 99% of total emissions.

- Within Scope 3, *Capital goods* — primarily the manufacturing of major project components — accounted for over 93% of emissions, reflecting our business model as a renewable energy project developer. At QENERGY, we are committed to collecting information on the traceability of GHG emissions in the supply chain. In 2025, 100% of the PV panels ordered for our French projects had a low-carbon certification issued by [Certisolis](#). Among Capital goods emissions for PV projects, modules represented about 79% of emissions, followed by trackers (17%), inverters (1%), and cables (3%). Emissions from wind turbines were minimal, as more PV projects than wind projects were completed in 2025.



Capital goods emissions breakdown by PV components

## Environment

- *Upstream transportation* of modules, inverters, and trackers by sea and road was the second-largest contributor to Scope 3 emissions.
- *Employee commuting* also contributed to Scope 3 emissions (1%), covering daily round trips between employees' homes and workplaces, as well as the commutes of main subcontractors to project sites. Site-related travel data was collected through reports submitted by subcontractors, while data on QENERGY employees was collected through a company-wide survey, supported by educational content when communicating the results. QENERGY continues to promote low-carbon commuting and other sustainable office practices, further detailed below and in the *Corporate Social Responsibility* subchapter.

	Electric vehicle charging station	Subsidised public transport for employees
Berlin	No	Yes
Avignon	Yes	Yes
Paris	Yes	Yes
Nantes	No	Yes
Lyon	No	Yes
Bordeaux	Yes	Yes
Toulouse	No	Yes
Montpellier	Yes	Yes
Madrid	Yes	No
Seville	No	No
Badajoz	Yes	No
Porto	No	No
Lisbon	Yes	Yes

## Metrics

**375,580 tCO<sub>2</sub>e**  
 will be avoided in the lifetime of  
 projects finished in 2025

Methodological notes: Avoided GHG emissions (tCO<sub>2</sub>e) were estimated by multiplying the expected lifetime energy production of each asset (25 years) by the projected carbon intensity of the national power sector. Projects that reached COD during 2025 were included in this calculation. Sources: Statista, based on Aurora Energy Research 2020 and Climate Analytics, 1.5°C national pathway explorer.

Office sustainability practices addressing Scope 3 emissions

## Environment

Scope	Activity type	QENERGY France SAS emissions (tCO <sub>2</sub> e)	QENERGY Solutions SE + QENERGY Europe GmbH emissions (tCO <sub>2</sub> e) <sup>1</sup>	Total
Scope 1	Stationary combustion	0.0	0.0	0.0
	Mobile combustion	200.3	206.4	406.7
	Fugitive emissions <sup>2</sup>	14.6	0.0	14.6
	<b>Scope 1 - Total</b>	<b>214.9</b>	<b>206.4</b>	<b>421.3</b>
Scope 2	Purchased electricity - location-based	15.1	41.6	56.7
	Purchased electricity - market-based	2.3	25.4	27.7
	Purchased heat	0.0	40.0	40.0
	<b>Scope 2 - Location-based</b>	<b>15.1</b>	<b>81.5</b>	<b>96.7</b>
	<b>Scope 2 - Market-based</b>	<b>2.3</b>	<b>65.4</b>	<b>67.6</b>
Scope 3	Purchased goods and services <sup>3</sup>	352.8	2,234.2	2,587.0
	Capital goods	57,356.0	64,247.1	121,603.1
	Fuel- and energy-related activities (not included in scope 1 or scope 2) <sup>4</sup>	82.6	81.7	164.3
	Upstream transportation and distribution	2,371.2	1,790.8	4,162.0
	Waste generated in operations	126.9	604.5	731.4
	Business travel	23.7	68.2	91.9
	Employee commuting	202.5	555.9	758.3
	<b>Scope 3 - Total</b>	<b>60,515.8</b>	<b>69,582.3</b>	<b>130,098.1</b>
<b>Total</b>	<b>Scope 1 + 2 + 3 Location-based (tCO<sub>2</sub>e)</b>	<b>60,745.9</b>	<b>69,870.3</b>	<b>130,616.1</b>
	<b>Scope 1 + 2 + 3 Market-based (tCO<sub>2</sub>e)</b>	<b>60,733.0</b>	<b>69,854.1</b>	<b>130,587.1</b>

### Methodological notes:

The carbon footprint covers all offices and all projects under construction in 2025, with the exception of Scope 3 categories *Capital goods* and *Upstream transportation and distribution*, where only projects that reached COD in 2025 were included. Emission factors were supplier-specific where available; otherwise, national or local official sources or industry averages were applied. Calculations followed the GHG Protocol, with reasonable estimates applied where actual data was unavailable.

1. Due to shared office locations and utilities, emissions from QENERGY Solutions SE and QENERGY Europe GmbH cannot be reliably separated and are therefore reported on a combined basis.
2. In offices outside France, Scope 1 *Fugitive emissions* from refrigerants used in cooling systems are excluded from the emissions calculations. This is because, in these offices, QENERGY does not have operational control over their cooling systems and therefore lacks the authority to access data or establish and implement related operating policies.
3. Scope 3 *Purchased goods and services* includes co-working space rental services, which also cover energy consumption. As it is not possible to separate energy costs from the overall service invoices and given that energy-related emissions from co-working spaces are minimal, these emissions are accounted for as part of the rental service.
4. Scope 3 *Fuel- and energy-related activities* is calculated following the location-based method.

## Environment

### Office energy consumption

Office energy type	Renewable energy consumption (MWh)	Non-renewable energy consumption (MWh)	Total energy consumption (MWh)
Electricity	250.64	139.79	390.43
Fuels	0.00	1,364.27	1,364.27
<b>Total</b>	<b>250.64</b>	<b>1,504.06</b>	<b>1,754.71</b>

Methodological notes: Office energy consumption includes electricity (as reflected in utility billings) and company car usage. In France and Portugal, car usage was recorded in mileage and converted to fuel consumption (litres) using average fuel rates per vehicle type. Fuel was then converted to energy using the [VSME Digital Template](#) converter.

### Construction site energy consumption

Construction site energy type	Renewable energy consumption (MWh)	Non-renewable energy consumption (MWh)	Total energy consumption (MWh)
Electricity	0	555.69	555.69
Fuels	0	9,932.97	9,932.97
<b>Total</b>	<b>0</b>	<b>10,488.66</b>	<b>10,488.66</b>

Methodological notes: Construction site energy consumption includes grid electricity (as reflected in utility billings) and fuel used for machinery and generators. Fuel was converted to energy using the [VSME Digital Template](#) converter.

## Future initiatives

In 2026, we will continue expanding our emissions calculations to include projects in the O&M phase under QENERGY's asset management, covering fuel use, waste, and component replacement. Additional sources will also be added to Scope 3 *Purchased goods and services*, such as main office equipment. With the launch of a unified business travel platform, Scope 3 *Business travel* data will be harmonised across locations. We also aim to improve data quality and completeness by obtaining more supplier-specific emission factors, particularly from subcontractors.

## Climate Transition Plan

In 2026, we aim to extend beyond the French region and develop a Climate Transition Plan covering other regions and entities. The plan will define baseline emissions, reduction targets, and key decarbonisation measures aligned with the 1.5°C pathway.

# Biodiversity and Ecosystems

## POLICY

Under the QHSE Policy, the preservation of biodiversity is a key priority for us. We therefore seek to avoid negative impacts of our activities on biodiversity wherever possible and to make a long-term contribution to the preservation of sensitive ecosystems and endangered species.

### Habitat Protection

#### Practice

- Development phase: Priority is given to sites that are not part of the [Natura 2000 European Network](#) and are not designated as protected at the state, regional, or local level. Preliminary early-stage environmental feasibility analyses are conducted based on various environmental factors to support smooth development and permitting processes, ensuring our projects minimise disruption to ecologically sensitive areas.
- Engineering phase: Designs aim to protect habitats by incorporating habitat corridors that support species connectivity and by carefully planning infrastructure routes for cables, pipelines, and access roads. Wind turbines are sited away from nesting and migratory areas; solar layouts are designed to minimise fragmentation; and battery energy storage system (BESS) sites use compact footprints on low-sensitivity land.
- Construction phase: Dedicated internal and external environmental coordinators oversee the implementation of all biodiversity-related requirements within the EMP. This includes ensuring that mitigation measures to protect sensitive habitats are applied and that any environmental incidents affecting these areas are managed appropriately.
- Asset management phase: We continue to implement environmental measures required by administrative authorisations. Periodic inspections of restored and naturally revegetated areas are conducted, focusing on topography, soil conditions, and plant regrowth. External experts also carry out regular ecological monitoring and environmental reporting to assess the long-term effectiveness of measures like compensation areas.

### Restoration of 130 hectares of habitat for the golden eagle

As part of the repowering of the Souleilla-Corbières wind farm, QENERGY has contributed to the restoration of 130 hectares of hunting habitat for a pair of golden eagles historically present in the region. The project aims to secure a sustainable hunting ground within the state-owned forest, supporting the pair's long-term settlement and improving breeding conditions. To enhance prey availability, dedicated "wildlife shelters" were established, creating a more abundant and resilient food chain.

This initiative was carried out in close collaboration with the French National Forestry Office, in coordination with the Corbières-Fenouillèdes Regional Natural Park and the Natura 2000 network, under the supervision of an independent environmental consulting firm. Beyond benefitting golden eagles, the restoration also supports other local birds of prey and songbirds. Long-term monitoring will be conducted every five years over the 30-year lifetime of the wind farm.



Close-up photograph of a golden eagle  
(Credit: QENERGY)

### Habitat protection at Marsanne wind farm

As part of the repowering of the Marsanne wind farm, QENERGY worked with the French National Forestry Office to protect and restore forest habitats around the site. The project includes keeping 30 trees that are especially important for biodiversity and creating a “senescence island”, an area left to evolve naturally to support species reliant on mature and decaying wood. Other measures, such as installing bat nesting boxes and reducing chemical use, further support the forest’s ecological balance. This initiative shows how renewable energy projects can protect natural habitats while increasing clean energy production.



Senescence islands in the Marsanne wind farm (Credit: QENERGY)

### Metrics

Project sites in or near biodiversity-sensitive areas

Site name	Area (hectares)	Biodiversity-sensitive area	Location in relation to biodiversity-sensitive area
Spain – Cabrovales	102.4	KBA: Fuente de Cantos - Montemolín Site ID1746	In
Spain – Gallego 2	113.7	Natura 2000: (ES0000539) “Montes de Alfajarín y Saso de Osera”	Near
Spain – Olivares 1	60.7	KBA: Campiña de Jaén Site ID: 1941	In
Spain – Olivares 2	58.3	KBA: Campiña de Jaén Site ID: 1941	In
Spain – Centauro 1	125.0	KBA: Tordesillas-Mota del Marqués Site ID: 1676	In
Spain – Line 1	116.0	KBA: Tordesillas-Mota del Marqués Site ID: 1676	In
Spain – Clave 1	128.0	KBA: Tordesillas-Mota del Marqués Site ID: 1676	In
Spain – Iron 1	116.0	KBA: Castronuño-Zamora Site ID: 1677 Natura 2000: Riberas de Castronuño ES4180017	Near
Spain – Sisoneras 2	63.1	KBA: Alcudiva valley and mountain range Site ID: 1712	Near
Spain – Terrapower	55.6	KBA: Alcudiva valley and mountain range Site ID: 1712	Near
France – Cahuzac	3.5	Natura 2000: Vallée de l’Adour FR7300889	In

Methodological notes: Projects under construction located in or near biodiversity-sensitive areas are included. Near refers to sites that are partially overlapping with or within 200 metres of such areas. Biodiversity-sensitive areas include [Natura 2000 sites](#), [Key Biodiversity Areas \(KBA\)](#), and [UNESCO World Heritage Sites](#).

### Future initiatives

Given the nature of renewable energy development, QENERGY defines biodiversity-related measures project by project, in collaboration with local stakeholders and environmental experts. For example, in Portugal's Alentejo region, one solar project will restore local river ecosystems through riverbank cleaning, reestablishing water flow, and creating buffer zones to protect riparian habitats. In France's Occitanie region, a solar energy project will help restore breeding habitats for the European bee-eater (*Merops apiaster*), a rare and protected bird species.

### Wildlife Protection

#### Practice

- Development phase: Once a potential site is identified, we carry out a detailed preliminary environmental feasibility analysis. Subsequently, once the necessary adjustments have been made to the layout to ensure the least environmental impact, an Environmental Impact Assessment (EIA, referred to as: '*Etude d'Impact Environnemental*' in France, '*Evaluación de impacto ambiental*' in Spain, '*Avaliação de Impacto Ambiental*' in Portugal, '*Umweltverträglichkeitsprüfung*' in Germany, and '*Valutazione di Impatto Ambientale*' in Italy) is carried out in collaboration with specialised local environmental consultants. The EIA identifies and assesses impacts on local flora and fauna, including the presence of endangered or protected species, in line with EU regulations. The findings inform both our project design and the statutory permitting process, which includes public consultations to gather input on environmental aspects and especially on local biodiversity concerns.
- Engineering phase: To safeguard birds and bats, this phase includes adjustments to turbine height, rotation speed, and spacing to reduce collision risks. Solar projects avoid glare impacts, while BESS sites are selected in locations with less wildlife presence and are designed with protection measures.
- Construction phase: Environmental coordinators are responsible for ensuring that species-specific protection measures are in place and that any incidents involving endangered species are addressed swiftly and in line with the EMP.
- Asset management phase: External ecological experts conduct periodic monitoring to evaluate the effectiveness of the protective measures, such as the installation of bird protection systems and the implementation of bat curtailment during high-risk periods.

### Supporting local wildlife in Teruel

In April 2025, QENERGY continued to expand its presence in the north of Spain and started construction of a new 92-hectare PV plant in the province of Teruel. Beyond producing green energy, the project is designed to actively enhance local biodiversity through targeted environmental measures.

To minimise the site's ecological footprint and foster local wildlife, we will adjust the fences so that small animals can slip through them, install protective elements to prevent collisions and electrocution of birds, and create a green belt of hedges and plants around the site.

While nearby compensation areas are being adapted to the needs of steppe birds, the measures on the site itself will focus on the reintroduction of the lesser kestrel. New nest boxes and the restoration of the old field huts, which are a favourite shelter and breeding ground for the birds, will provide ideal conditions for the kestrels.



Example solar park by QENERGY in Spain  
(Copyright: QENERGY)

### Metrics

**100% Projects**  
with endangered species  
assessment in the EIAs

### Future initiatives

We will continue to adapt wildlife protection to each site's ecosystem and stakeholder expectations. For instance, in southern Portugal, one solar project will schedule construction outside the nesting season, use grazing instead of herbicides, and reforest with native oaks and green corridors to enhance habitat connectivity. In France, two bird protection systems will be installed on wind turbines to reduce collision risks for local raptors.

### Land Use

#### Practice

- Development phase: When selecting sites, we prioritise sustainable land use and ecological restoration opportunities, focusing on land affected by intensive agriculture, underutilised areas, and brownfield sites where feasible, while ensuring stable construction conditions. Our developments also explore ways to combine renewable energy generation with productive land and water use. Innovations like Agri-Photovoltaics and Floating Photovoltaics offer additional opportunities to integrate clean energy infrastructure with agricultural and aquatic ecosystems.
- Engineering phase: From the outset, land use considerations are integrated into project design by minimising earthworks, limiting concrete foundations, and following the site's natural topography. This reduces land disturbance and preserves existing landscape features.
- Construction phase: The EMP includes specific mitigation measures to manage land use impacts. Environmental coordinators oversee compliance with these actions, ensuring that soil and land structure are protected as much as possible.
- Asset management phase: The condition of restored areas is regularly inspected, with attention to soil quality, topography, plant cover, and the recolonisation of animal species. Long-term ecological monitoring ensures that land use restoration measures remain effective and that the land's natural functions are progressively reinstated.

### A farm-powered solar park

La Gineste Solar Farm, developed by QENERGY in close collaboration with the landowner and local municipality since 2011, officially inaugurated in May 2025. Originally, the site had been left fallow for over 65 years, holding no agronomic value and ineligible for agricultural subsidies. However, its strategic position within a wider agricultural system made it an ideal candidate for dual-purpose use.

A young local farmer now uses the land for livestock grazing, providing both a secure pasture and a stable source of income. This practice provides natural site

maintenance, supports biodiversity, and improves animal welfare. The partial shade from solar panels helps protect the flock from extreme weather, contributing to farm resilience. Environmental considerations were at the heart of the project's design. In line with the "avoid, reduce, compensate" principle, the site was carefully selected to avoid impacting moorland, thickets, and woodlands. Native hedgerows have been planted to help the site blend into the landscape, while wildlife corridors and educational signage near public trails aim to support biodiversity and community engagement.



Aerial View of La Gineste, France  
(Copyright: AbsoluDrones)

### Metrics

**2,262 Hectares**  
total use of land of all projects  
under construction in 2025

### Future initiatives

We ensure land use remains ecologically compatible and regenerative across projects. For example, in Seville, Spain, one solar plant will include a restoration plan to re-naturalise meadows, reuse topsoil, and plant locally sourced species to stabilise soil and support pollinators. In southern France, an Agri-Photovoltaics project will be closely monitored to ensure the land retains its agricultural value throughout operation.

## Resource Use and Circular Economy

### POLICY

Under the QHSE Policy, we are committed to further minimising our environmental and carbon footprint. Our initiatives include reducing our energy consumption, responsible waste management, and conserving natural resources.

### Waste Management

#### Practice

To minimise waste generation from the outset, we focus on reducing groundwork requirements, such as limiting the use of concrete foundations during construction. For each project, a Waste Management Plan is in place to reduce the environmental impact of construction activities.

Regular monitoring of waste generation is conducted as part of the environmental data collection process, with frequent touchpoints with subcontractors. As part of the subcontractor agreement, a Waste Management Plan is strictly followed during handling, storage, transportation and disposal of waste generated during construction, in accordance with EU regulations. Where possible, we collaborate with certified waste service providers at project sites to ensure alignment and efficiency with the waste hierarchy, local requirements, and permit conditions.

The waste generated during the construction process is primarily recyclable by-products, including cardboard, plastic, aluminium scrap, wooden containers,

and concrete as well as biomass sent to biomass centrals. About 25% of all construction site waste is directed to disposal, mainly consisting of non-recyclable waste such as septic tank sludge and, in the event of minor oil spills, contaminated soil.

Hazardous waste, such as used oils, lubricants, greases, paints, etc., is treated and handled according to the applicable regulations. The location, labelling, and proper storage of such waste are clearly defined and maintained for each project until it is collected and treated by an authorised waste handler. Dedicated storage areas are established based on the type, classification, and compatibility of the waste. Hazardous waste storage facilities are equipped with ventilation systems that ensure proper air circulation. To ensure spill control, all areas designated for waste storage and machinery refuelling are equipped with appropriate systems for leak containment or collection. Specific instructions are provided in the waste management plans of the projects.

### Reuse of IT equipment through laptop donation

As part of our efforts to promote waste reduction and circular use of resources, QENERGY continues to extend the life of IT equipment through targeted donation programmes. Over the past two years, more than 70 refurbished laptops have been donated to 12 associations and school groups.

In 2025, new beneficiaries included the agricultural association of Meynes and the volunteer group Ensemble pour l'Espoir, both of which received laptops fully refurbished by QENERGY's Digital Transformation Department. This initiative reflects our commitment to the reuse of functional equipment, ensuring that valuable resources continue to serve social and environmental purposes.



Laptop donation in 2025 (Copyright: Q ENERGY)

## Metrics

<b>Total waste (t)</b>	<b>2,183.73</b>
<b>Diverted from disposal</b>	<b>1,646.02</b>
<b>Hazardous waste</b>	<b>25.17</b>
Preparation of reuse	0.00
Recycling	25.17
Other	0.00
<b>Non-hazardous waste</b>	<b>1,620.85</b>
Preparation of reuse	25.80
Recycling	1,385.55
Other	209.50
<b>Directed to disposal</b>	<b>537.71</b>
<b>Hazardous waste</b>	<b>14.24</b>
Incineration	0.00
Landfill	11.88
Other	2.36
<b>Non-hazardous waste</b>	<b>523.47</b>
Incineration	2.75
Landfill	287.00
Other	233.73

Annual generation of waste broken down by type

## Future initiatives

In 2026, the Digital Transformation Department, in collaboration with the ESG workstream, aims to broaden laptop donation initiatives and strengthen responsible end-of-life management of IT assets across additional sites.

Methodological notes: Waste data covers all projects under construction and all offices in 2025. Office waste volumes are estimated based on samples from the Berlin office, while project waste is reported by subcontractors. *Hazardous waste* refers to waste with one or more of the hazardous properties listed in Annex III of the EU Waste Framework Directive (2008/98/EC). *Preparing for re-use* refers to checking, cleaning, or repairing recovery operations that allow products or components to be reused without further processing. *Recycling* refers to recovery operations in which waste materials are reprocessed into products, materials, or substances for the same or other purposes. Other categories follow the definitions set out in Annex I (Disposal Operations) and Annex II (Recovery Operations) of the same Directive.

# Circular Economy Principles

## Practice

- **Development phase:** In certain regions, decommissioning funds are included in financial models to cover restoration costs at the end of life. To extend asset lifespan, lifetime extension studies for wind turbines are also conducted.
- **Engineering phase:** Technical designs focus on efficiency and circularity by optimising power plant design, turbine aerodynamics, solar panel angles, or ground cover ratios. Designs also consider enabling simple disassembly of broken or end-of-life components for easy classification, labelling, storage, and transport for recycling when repair or reuse is not possible.
- **Procurement phase:** Procurement ensures quality components with market-standard or extended warranties. End-of-life considerations are addressed through contractual clauses, ensuring relevant components are included in a take-back and recycling scheme and properly disposed of at the end of their lifecycle. For wind projects, repairability is supported by capturing turbine component design data via Escrow arrangements. Additionally, we are committed to gathering information about circular design features for key components, for example, test reports about product durability and long-term reliability.
- **Construction phase:** During construction, a Waste Management Plan is implemented. We apply the waste hierarchy by repairing and reusing components where feasible, such as refurbishing solar panels; recycling through certified companies with chain-of-custody protocols where reuse is not possible; avoiding landfill unless no other disposal options exist. We maximise component lifetimes through proper installation, maintenance in line with manufacturers' guidance, and safe handling and storage of damaged parts to enable reuse, repair, or recycling.
- **Asset management phase:** Maintenance during the operational life prioritises repair over replacement, reducing the need for newly manufactured products and extending asset lifespan. Asset operation and maintenance are optimised to conserve resources, limit downtime, avoid unnecessary repairs or replacements, and maintain the planned performance ratio.
- **End-of-life phase:** End-of-life options are assessed through safety and viability testing, based on the waste hierarchy and decommissioning plans where available. Where appropriate, operational life is extended if risks remain acceptable. If not, repowering of wind and solar assets is prioritised to reduce the project footprint — as modern turbines and solar modules can generate more power with less land area.

### From pioneer to leading player in repowering in France

In 2025, QENERGY reached a major milestone in France by developing more than 1 GW of wind repowering projects with 5 different asset owners. With many wind farms in France approaching the end of their 20-year lifespan, repowering has become an important way to maintain renewable generation capacity while improving performance and environmental efficiency.

Across the country, around 5.8 GW of wind capacity could be repowered by 2032, and France has set a 90% recycling target for turbine materials to support circular use of resources.

QENERGY was among the first to work in this field, starting in 2016 with the Souleilla-Corbières project in Occitanie. Since then, we have continued to dismantle and rebuild two additional large-scale sites — Cuxac and Marsanne — where even more significant modifications were implemented, including increased tip heights and adjusted turbine location.



Current repowering project Cuxac by QENERGY in France  
(Copyright: Absoludrones)

### Metrics

**100%**

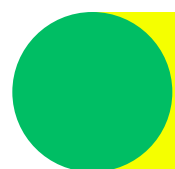
of PV panels ordered for French projects have a low-carbon certification issued by Certisolis

**>1GW**

repowering projects under development

### Future initiatives

QENERGY has begun assessing the use of second-hand wind turbines and aims to further enhance resource efficiency and promote circular economy practices in 2026.



## Own Workforce

### Employment Overview

Number of employees by country of employment contract

Country of employment contract	Number of employees (headcount)
Germany	140
France	307
Italy	2
Spain	120
Portugal	32
Others	1
<b>Total</b>	<b>602</b>

Methodological notes: Unless otherwise specified, the term *employees* in this subchapter includes interns and trainees (referred to as *apprentissage* in France), and others under non-permanent employment contracts.

All employee headcount data in this subchapter are reported as of 31 December 2025.

Number of employees by type of employment contract

Type of contract	Number of employees (headcount)
Temporary contract	24
Permanent contract	578
<b>Total</b>	<b>602</b>

Methodological notes: Temporary contracts include interns, trainees (*apprentissage* in France), and other non-permanent employment arrangements.

Number of temporary workers

Type of workers	Number of employees (headcount)
Total temporary workers provided by undertakings primarily engaged in employment activities	2

Methodological notes: *Temporary workers* refer to individuals employed indirectly by QENERGY under fixed-term contracts. They are not included in the “Employees under temporary contracts” indicator in the table above. Subcontracted personnel working on project sites are not included in this category.

**6.82%**  
employee turnover rate

**- 4.28%**  
change in employee turnover rate compared to 2024

Methodological notes: The *turnover rate* is calculated as:  
 $\text{Number of employees who left in 2025} \div \text{Average number of employees in 2025}$ .

## Human Rights and Fair Labour Practices

### POLICY

As stated in our Code of Conduct, we will not tolerate the exploitation of children and young people due to child labour or forced labour of any type. Since we operate on an international level, we comply with the respective national statutory regulations at each of our locations.

## Practice

QENERGY is committed to upholding the human rights of our employees. To support this commitment, we maintain a dedicated communication channel, which is further detailed in the *Whistleblowing Reporting Channel and Grievance Mechanism* section of the *Business Conduct* subchapter. Employees can use this platform to report any misconduct, legal violations, or breaches of our [Code of Conduct](#) and company guidelines.

In line with national labour policies, we strictly follow our company guidelines to deliver fair and lawful working conditions. This includes providing wages above the legal minimum or aligned with recognised living wage standards, standardising working hours

and consecutive working days, complying with minimum working age requirements, and ensuring legally mandated allowances and benefits for employees.

We fully respect freedom of association, with active Works Councils in both France and Germany ensuring employee representation. They play a key role in safeguarding employee rights and supporting regulatory compliance across our operations. Our Works Councils regularly organise meetings with management to share key points raised in employee dialogues and proposals. The process is internally documented in line with legal requirements, and outcomes are communicated to the affected employees.

## Metrics

51%

of employees are covered by collective bargaining agreements

Methodological notes: In this context, employees exclude interns and trainees (*apprentissage* in France). In France, 100% of employees are covered by collective bargaining agreements. In Germany, QENERGY is not party to any collective bargaining agreements. Employee representation is ensured separately through elected Works Councils, which operate independently of collective bargaining arrangements.

## Future initiatives

Building on our existing compliance system, we aim to continue maintaining our alignment with national labour policies, international human right standards, and raising awareness among management and employees.

# Diversity and Anti-Discrimination

## POLICY

Under our Code of Conduct, we do not tolerate any discrimination, especially on the grounds of nationality, ethnic origins, culture, religion, skin colour, disability, age, gender identification, sexual orientation, political orientation, or gender. Likewise, we do not tolerate any sexual harassment or other personal attacks on individuals within the company or regarding our business partners, as detailed in the Anti-Discrimination Directive.

## Practice

We are proud to be a diverse team, and international and cross-cultural cooperation is part of our everyday work routine. As part of our commitment to fostering an inclusive and equitable workplace, we have implemented targeted initiatives in talent acquisition and human resources management. These include measures such as inclusive job advertisements and training for hiring managers to promote equal opportunities and reduce bias in recruitment and selection processes. We also place great importance on skill-based recruiting and do not take personal characteristics such as social background and gender into account.

We also actively foster cultural agility to enhance understanding and collaboration across diverse backgrounds. To celebrate our multicultural environment, we recently launched a *Cultural Appreciation Series* highlighting local holidays and their significance across our operational locations. In addition, we have been continuously enhancing multi-language support in our corporate communications to make internal information more accessible and inclusive for all employees.

To ensure continuous improvement, we regularly track diversity-related data, such as gender distribution, gender pay gap, nationality mix, and use these insights to refine our initiatives and support fair, inclusive career development opportunities for all employees.

## 2025 International Women’s Day campaign

Each year on March 8th, we celebrate International Women’s Day to honour women’s achievements and advocate for gender equality. In 2025, we ran a dedicated internal campaign to raise awareness and foster dialogue around this important topic.

The campaign began with an educational video on the history and significance of International Women’s Day, followed by the disclosure of our “Professional Equality Index” to employees, promoting transparency around gender representation. Together with the association *Right To Be*, we co-hosted a coffee meeting on how to address sexual harassment in public spaces. To amplify personal stories, we interviewed female colleagues about their experiences and perspectives on gender equality. The initiative concluded with a networking coffee break for female employees, providing a space for connection and meaningful conversations. This campaign served as a reminder of the importance of everyday action in creating an inclusive, safe, and supportive workplace.



Bringing women together: networking at the Berlin office (credit: QENERGY)

## Inclusion and disability awareness at work

Making QENERGY a more inclusive and caring workplace is our shared goal. To achieve this, in 2025, we participated in various activities beyond the European Disability Employment Week, including awareness workshops, debates, discussions with an occupational health psychologist, and wellness sessions such as massages given by a blind professional.

QENERGY also took part in the French national event *DuoDay*, welcoming people with disabilities into our teams for a day of workplace observation. These activities encouraged open conversations about disability, challenged stereotypes, and strengthened our commitment to inclusion.

At the same time, in collaboration with the *ESAT les Colporteurs d’Etoile*, two employees took part in the reverse *Duoday*, immersing

themselves in the professional environment of workers with disabilities, by making jams, preparing meals, and taking part in various other workshops. The day concluded with a shared meal and a round-table discussion on respectful and inclusive treatment of people with disabilities.



Keywords on the theme of “bientraitance” (credit: QENERGY)

## Metrics

**55**  
different nationalities in our own workforce

Number of employees by gender

Gender	Number of employees
Male	340
Female	261
Other	1
Not reported	0
<b>Total</b>	<b>602</b>

Number of employees by age group

Age	Number of employees
Under 30	154
30-50	399
Over 50	49
<b>Total</b>	<b>602</b>

**35:91**  
gender diversity ratio (female:male) at management level

Methodological notes: *Management-level* positions refer to employees who supervise one or more team members and hold disciplinary responsibilities, starting from the “Team Lead” level and above.

**2:9**  
gender diversity ratio (female:male) in governance body

Methodological notes: *Governance body* positions refer to Heads of Functions, counted once per person.

## Future initiatives

In 2026, we aim to align with the EU Transparency Act by further strengthening pay equality and transparency. As part of this process, salary adjustments can be decided where needed to reduce remaining gaps and ensure consistent, fair compensation.

## Work-life Balance

### POLICY

Our Code of Conduct promotes the professional and personal development of our employees and responds with a flexible approach to individual personal circumstances. Balancing work with family life is important for us; we expressly and actively support such an endeavour.

## Practice

We strive to create a flexible work environment that addresses our employees' individual circumstances and recognise that balancing work and private life reduces stress, boosts job satisfaction, and promotes overall well-being and resilience.

Our flexible work options include flextime, home office work, and individual part-time arrangements. In addition, we offer special leave for occasions such as bereavement, relocation, and every five-year employment anniversary, as well as long-term leave options such as sabbaticals for eligible employees.

To better support family care, we go beyond local policies by providing additional benefits, such as childcare-related initiatives. For example, our Berlin headquarters includes a dedicated rest area for pregnant and breastfeeding employees.

## Quality of life and working conditions week

To foster well-being and a healthy work-life balance, QENERGY France held its annual Quality of Life and Working Conditions Week from June 16 to 20, 2025, under the theme “*Talking about work is productive*”.

Throughout the week, employees took part in 14 webinars, workshops, and discussions covering topics such as self-confidence, mental health, screen time management, the link between sleep and productivity, conflict resolution, and other aspects of workplace well-being. To complement these activities, office breakfasts were also organised by local directors to open dialogue around the shared message: *Well-being at work is everyone's business*. Following this week, additional initiatives on well-being, disability inclusion, and the prevention of psychosocial risks were introduced later in 2025. The initiative reflects QENERGY's ongoing commitment to cultivating a supportive and balanced work environment where employees can thrive both professionally and personally.

## Metrics

# 100%

### of employees are eligible for family-related leave

Number of employees who took family-related leave

Gender	Employees who took family-related leave
Male	23
Female	14
Other	0
<b>Total</b>	<b>37</b>

Methodological notes: *Family-related* leave includes maternity leave, paternity leave, parental leave, and carers' leave, available to employees under QENERGY policies and/or national laws.

## Future initiatives

In 2026, we will continue offering well-being sessions on topics such as stress and time management and launch employee surveys to further identify needs and guide future work-life balance initiatives.

## Health and Safety (H&S)

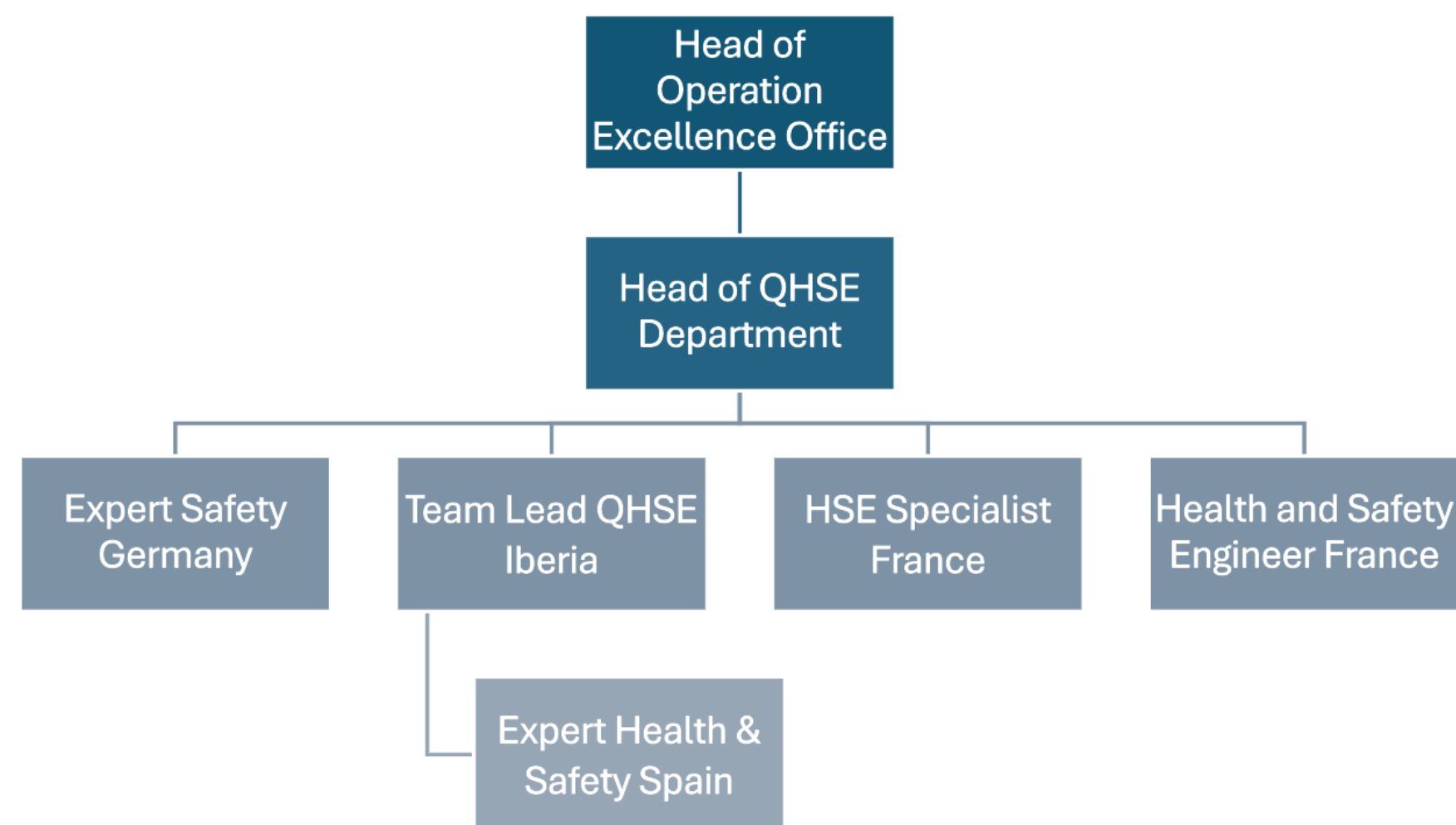
### **POLICY**

Under the QHSE Policy, the H&S of our employees is paramount. We are committed to providing a safe, healthy work environment in compliance with applicable laws and international standards, by identifying, assessing, and mitigating risks, fostering QHSE leadership, and encouraging open communication. Ongoing training and awareness help ensure that everyone understands and follows health and safety best practices.

## Practice

The H&S team, whose structure is outlined on the right, promotes a strong safety culture across all levels of QENERGY. Key measures include:

- Providing mandatory H&S training during onboarding for new employees.
- Issuing guidance on regular accident prevention, emergency response, and Environment, Health, and Safety training for visitors.
- Organising regular occupational health checks at our offices.
- Establishing local teams in each office to oversee H&S implementation and continuous improvement of measures.
- Embedding accident reduction targets into company KPIs to ensure accountability and track performance.



Organisational chart on H&S

Beyond standard H&S education, we regularly organise awareness sessions addressing a broader range of topics. These include mental health, road safety, nutrition, physical activity, and addiction prevention. Although H&S measures on project sites also apply to our own employees, this content is reported in the *Workers in the Value Chain* subchapter for consistency, as most of the site workforce consists of subcontractors. For further details on project-level H&S management, please refer to that section.

## Metrics

**100%**

of employees are covered by an H&S management system that aligns with country-specific legal requirements

**57%**

of employees are covered by an ISO 45001-certified H&S management system

### H&S indicators for own workforce

Own workforce H&S indicators	Unit	Number
Number of fatalities as result of work-related injuries and work-related ill health	Count	0
Number of fatalities as result of work-related injuries and work-related ill health on project sites	Count	0
Number of recordable work-related accidents	Count	1
Rate of recordable work-related accidents (per 200,000 hours worked)	Rate	0.18
Total hours worked by employees in the reporting period	Hour	1,103,443
Rate of recordable work-related accidents (per million hours worked)	Rate	0.91

Methodological notes: Unless otherwise specified, the term *employees* in this subchapter includes interns and trainees (referred to as *apprentissage* in France), and others under non-permanent employment contracts.

## Future initiatives

In 2026, we aim to organise monthly learning sessions to share key insights across the company, with a particular focus on health prevention and safety awareness. We will also continue to ensure that regular emergency drills and certified first aid training are conducted for members of the emergency response team.

# Workers in the Value Chain

## Human Rights

### POLICY

Human rights considerations are embedded in QENERGY's Code of Conduct, which prohibits forced labour, child labour, and other human rights violations. Our Modern Slavery Statement further outlines our approach to addressing human rights risks in the supply chain, supported by risk-based due diligence and contractual obligations.

## Practice

QENERGY's due diligence approach is integrated throughout all phases of the supplier relationship, with a focus on key components (e.g., PV modules, batteries, wind turbines) and subcontractors:

- Tender phase: All suppliers and subcontractors undergo general screening, where appropriate: a Know Your Business Partner (KYBP) form, 4-eyes-principle, ESG documentation review, and assessment of geographic risks.
- Contracting phase:
  - Supplier contracts include clauses on preventing human rights violations, consent to audits, and corrective actions for non-compliance. This year, we further integrated our [Code of Conduct](#) into key supplier contracts.
  - Subcontractor contracts include clauses ensuring compliance with employment, H&S, and immigration laws, ensuring no foreign workers are deployed in irregular situations. This year, we also further integrated our [Code of Conduct](#) into subcontractor contracts. Subcontractors are contractually obligated to extend these requirements through their subcontracting chains.
- Post-contractual monitoring: Where appropriate, we conduct or commission audits of suppliers and subcontractors based on risk, to ensure compliance with contractual agreements. Audit outcomes are reviewed, with corrective actions agreed and monitored as needed.

## Future initiatives

We are actively working to strengthen ESG due diligence across our supply chain. In 2026, we aim to integrate supply chain risk assessment for all new key component suppliers.

# Health and Safety (H&S)

## POLICY

The QHSE Policy applies not only to employees but also to everyone who interacts with our activities, including workers in our value chain. Together with our partners and subcontractors, we seek to prevent risks, promote a safety culture and encourage the reporting of health and safety concerns, so that issues can be taken seriously and addressed.

## Practice

As introduced in the *Own Workforce* subchapter, QENERGY places strong emphasis on H&S. On our construction sites, this focus extends to subcontractors, who make up the majority of the site workforce. Here, our H&S team works closely with subcontractors to implement a comprehensive management system, including mandatory site inductions, regular reporting, and clearly displayed onsite guidelines.

In addition to these core measures, we apply further practices to strengthen on-site H&S:

- On-site management
  - Appointing dedicated H&S Coordinators to oversee site compliance and organise regular meetings.
  - Implementing a structured H&S reporting and management process with the subcontractors, with penalties proportionate to incident severity — ranging from warnings and site exclusions to financial sanctions.
  - Conducting regular audits covering general

compliance and specific improvement areas, followed by corrective action plans and documentation.

- Maintaining trained contingency response brigades onsite to prevent, mitigate, and control serious H&S incidents.
- Workers' qualification and education
  - Conducting occupational health checks for site workers.
  - Verifying the qualifications and competence of subcontractors' H&S personnel, with the authority to reject non-compliant candidates.
  - Incorporating H&S obligations in the subcontractors' contracts.
  - Empowering workers with the right to refuse unsafe conditions.

For practices related to our own office-based employees, please refer to the *Own Workforce* subchapter.

Metrics

**100%**  
of projects have a H&S management plan

**100%**  
of construction subcontractors completed safety training

**100%**  
of construction sites underwent H&S audits

H&S indicators for subcontractors

Subcontractor H&S indicators	Unit	Number
Number of fatalities as result of work-related injuries and work-related ill health	Count	0
Number of fatalities as result of work-related injuries and work-related ill health on project sites	Count	0
Number of recordable work-related accidents	Count	20
Rate of recordable work-related accidents (per 200,000 hours worked)	Rate	2.39
Total hours worked by employees in the reporting period	Hour	1,674,516
Rate of recordable work-related accidents (per million hours worked)	Rate	11.94

Methodological notes: All subcontractors in projects under construction and in O&M phase under own Asset Management in calendar year 2025 are included.

Future initiatives

In 2026, we plan to extend these regular drills and certified first aid training to employees who work closely with our workers in the value chain — such as project managers, project engineers, construction managers, and business developers — to further strengthen H&S practices within and beyond our existing framework.

# Affected Communities

## Human Rights

### POLICY

**QENERGY's Code of Conduct also respects the personal dignity of each individual and is committed to safeguarding human rights.**

## Practice

We actively engage with local stakeholders — including landowners, public authorities, associations, and residents — throughout the project lifecycle. This engagement is carried out primarily through public consultations and community outreach activities, as detailed in the next section on *Local Impact and Engagement*.

Through these interactions, we strive to respect the rights of indigenous peoples, minorities, and other vulnerable groups, including their freedom of expression and equitable access to natural resources. All land use agreements and any related clearance activities are conducted in compliance with applicable laws and internationally recognised standards, such as IFC Performance Standards, the UN Guiding Principles on Business and Human Rights, and the ILO Conventions.

Additionally, QENERGY has established grievance mechanisms accessible to affected community stakeholders. These are detailed further in the *Business Conduct* subchapter.

## Future initiatives

QENERGY will continue to maintain transparent and collaborative communication with local communities and rely on existing compliance and grievance processes to identify and address any potential cases that may arise.

# Local Impact and Engagement

## Practice

We aim to create positive economic, environmental, and social value for the communities where we operate. From early project stages, we prioritise transparent dialogue and engagement with local stakeholders. During the permitting process, environmental, social, and archaeological studies through both the administrative authorisation process and the EIA are integrated into public consultations. This allows us to work with local stakeholders to not only minimise potential risks and impacts, but also to generate initiatives to increase the well-being of these communities.

We maintain open, long-term relationships with key local stakeholders:

- Development phase: Our engagement with local communities is an integral part of the regulatory permit process, particularly during its public consultations on the topic of EIAs. These assessments, together with related

information, such as the Stakeholder Engagement Plan, are made publicly available through official gazettes and local government websites. This enables residents, environmental associations, and neighbourhood groups to provide input, which is documented and taken into account along with our responses and any project implications in the authorisation resolution process (referred to in most regions as *Environmental Impact Statement or Declaration*).

- Construction and operation phases: Regular engagement continues with local authorities, NGOs, and community groups for project monitoring and local development. When complaints occur, a grievance mechanism is in place to manage and resolve concerns. Details are available in the *Grievance mechanism* section within the *Business Conduct* subchapter.

Our grievance mechanism enables the affected communities to share feedback or raise concerns about our renewable energy projects. Email addresses exist for each project phase and region and are proactively communicated by the relevant teams regularly. Each inbox is jointly managed by at least two colleagues to ensure transparency and timely follow-up.

## Engaging local communities at the Tour de France

In July 2025, QENERGY took part in the Tour de France as it passed through Marsanne, home to one of our wind repowering projects. At the invitation of the Mayor of Marsanne, several QENERGY members from Lyon hosted an information and activity stand to engage with local residents and visitors.

The team used the event to raise awareness about wind energy, biodiversity, and the Marsanne repowering project through an interactive “wheel of wind” game and educational activities for children. This initiative created a positive space for dialogue around renewable energy, helping strengthen our connection with the local community, where we have been present for more than 20 years, having begun development in 2004.



QENERGY employees at the engagement event (Credit: QENERGY)

## Metrics

**100%**  
of ongoing construction projects went through public consultations in the development phase

**€117,200**  
contribution of community engagement measures (not permit-driven)

**100%**  
of obligations regarding community benefits are aimed to be fulfilled

## Future initiatives

Building on our ongoing engagement practices, we aim to further strengthen local dialogue and long-term partnerships in the regions where we operate, while promoting initiatives that support education, biodiversity, and community well-being.

# Corporate Social Responsibility (CSR)

At Q ENERGY, our CSR initiatives focus on how we, as employees and as a company, contribute positively to society beyond our renewable energy projects. From awareness campaigns and employee volunteering to education initiatives and community partnerships, we aim to foster a sense of shared responsibility and make a tangible difference where we live and work.

## Pink October – raising awareness about breast cancer

At Q ENERGY, being responsible goes beyond our daily work — it means showing up for one another, standing behind important causes, and using our collective voice to promote awareness and empathy. In October 2025, we proudly joined the global Pink October movement to raise awareness about breast cancer.

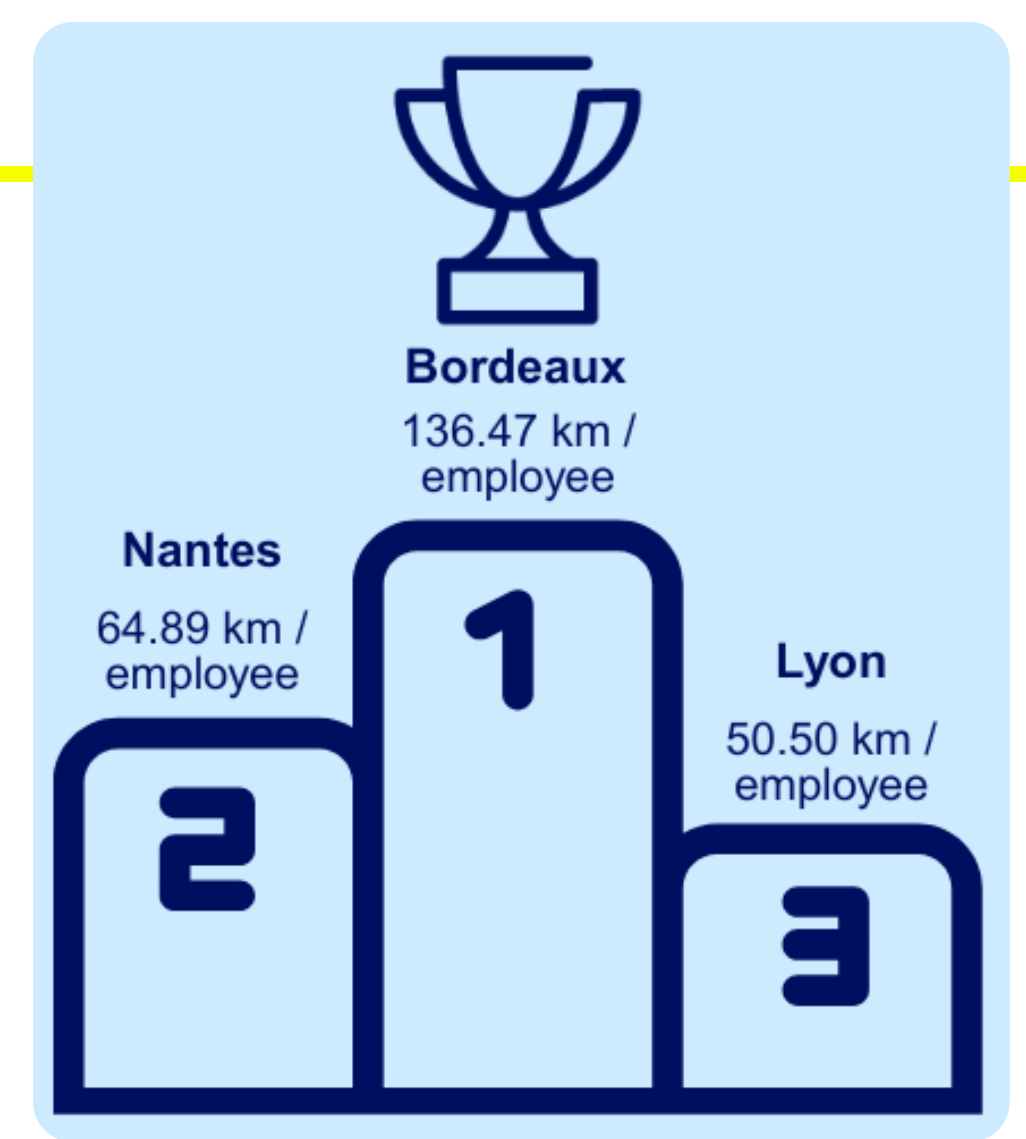
Across our locations, employees wore pink and came together to demonstrate solidarity and care. The initiative reflected our commitment to health, well-being, and empathy, fostering a workplace culture where responsibility and compassion go hand in hand.



Pink October at the Seville office (Credit: QENERGY)

## Pedalling together for a greener future

In 2025, for the second consecutive year, Q ENERGY took part in the “Bike in May” initiative, engaging teams across all countries around the theme of sustainable mobility. Various activities — including repair workshops, themed bike rides, and breakfasts — were organised in several offices. To encourage participation, a reward system was introduced, allowing offices that reported on one of the two internally initiated challenges (the *Best Office Challenge* and the *Best Cyclist Challenge*) to receive an increase in their sustainable mobility budget. This initiative not only fostered team cohesion but also strengthened QENERGY’s internal culture of soft mobility. Beyond promoting eco-mobility and encouraging employees to adopt more environmentally friendly means of transport, it also served as an opportunity to reinforce awareness of our internal eco-mobility policies.



Top 3 offices in the Best Office Challenge 2025 (Credit: QENERGY)

## Raising awareness among younger generations is essential to building a sustainable future

In partnership with France Renouvelables, the French national association representing renewable energy professionals, our teams proudly took part in the “Génération Transition” initiative. Nearly 280 students visited our wind farms to experience first-hand how renewable energy contributes to tackling climate change and shaping a more sustainable future.



Closer to our Avignon headquarters, we joined a local discovery day organised by a long-standing partner sports association that we have supported for over 15 years. Through fun, hands-on activities, we helped 200 primary school pupils explore the principles of clean energy and the importance of environmental stewardship.

Together, these initiatives illustrate our unwavering commitment to climate adaptation and to creating lasting, positive impact in the communities where we operate — two cornerstones of our CSR strategy.

Our CSR colleague engaging with children during the activity (Credit: QENERGY)

## The Forges of Val-Suzon: preserving the past, inspiring the future

For more than a decade, QENERGY has been proudly supporting the restoration of the historic Forges of Val-Suzon, an ancient blast furnace in the Côte-d’Or county in France — a remarkable site that stands as a testament to France’s rich industrial heritage. Each year, we provide financial support to the local preservation association leading the renovation, ensuring that its legacy endures for future generations.

Beyond safeguarding heritage, the project looks to the future. The restoration plan includes the creation of an educational space dedicated to renewable energy, designed to connect past and present by linking industrial ingenuity with today’s energy transition. This new hub will offer visitors — particularly young audiences — an opportunity to discover how innovation and sustainability can work hand in hand.

Through this long-term partnership, QENERGY contributes not only to cultural preservation, but also to community engagement and environmental awareness — demonstrating that building the future of energy can go hand in hand with honouring the past.



Close-up photograph of the Forge de Val Suzon (Credit: Association de Défense et de Sauvegarde des Forges de Val Suzon)

## Business Conduct

### General Compliance

#### **POLICY**

The foundations of our business conduct principles are formalised through our Code of Conduct, which serves as a framework for behaviour and decision-making for all employees and business partners. The Code of Conduct is publicly available on our website.

### Practice

QENERGY is not only committed to fulfilling national law but also seeks to follow international guidelines such as the OECD Guidelines for Multinational Enterprises. To ensure ethical business practices and compliance with legal standards, we have set out to establish a comprehensive and unified Compliance Management System. Our Compliance organisation fulfils the following tasks:

- Risk assessment for key processes regarding compliance issues.
- Development of overarching company-wide processes and provision of key systems for compliance issues.
- Investigation of incidents and responses to possible infringements.
- Advisory for the Management.
- Implementation of training courses and provision of training documents.

At QENERGY, we have two independent compliance teams in Germany and France, and the distinction is due to regional differences within each legal system. Both teams strive to align our compliance organisation throughout the entire group:

- QENERGY Solutions SE & QENERGY Europe GmbH (both incorporated in Germany)
- QENERGY France SAS

## Metrics

7

compliance trainings  
conducted in 2025

**All Employees**

are required to read and adhere  
to the Code of Conduct

## Future initiatives

In 2025, the Compliance team began developing updated training and educational materials to strengthen awareness of compliance principles across all business units. The rollout of these materials is planned in 2026, alongside continued efforts to enhance monitoring and documentation practices.

# Whistleblowing Reporting Channel and Grievance Mechanism

## POLICY

**QENERGY has established a whistleblowing reporting channel and grievance mechanism in line with legal requirements. Both aim to ensure that reports and complaints are handled confidentially (and where applicable anonymously), fairly, and thoroughly.**

## Practice

Our whistleblowing reporting channel is a secure, web-based system, called *Hintbox*. Employees and business partners (suppliers and customers, etc.) may use this system to report any misconduct or violation of laws, our [Code of Conduct](#) as well as our company guidelines — if desired, completely anonymously. The system is described in our [Code of Conduct](#), and available on our website [here](#) in English, French, German, Spanish, and Portuguese. It is also proactively addressed during employee onboarding and in supplier and subcontractor contracts as part of the [Code of Conduct](#). Once a report is submitted, the Compliance Officer receives it and guides the next steps, as well as initiates an investigation in case the facts merit such action. Once the investigation is finalised, a report

is submitted to Management outlining the misconduct or breach of law and regulations, recommending solutions to address the current misconduct as well as implement measures to prevent future misconduct.

Our grievance mechanism enables the affected communities to share feedback or raise concerns about our renewable energy projects. Email addresses exist for each project phase and region and are proactively communicated by the relevant teams regularly. Based on the nature of the complaint, other teams, such as the Compliance Officer, may be involved to ensure thorough resolution. Each inbox is jointly managed by at least two colleagues to ensure transparency and timely follow-up.

## Metrics

# All Employees

have been informed and read about the Whistleblowing Reporting Channel

# All new subcontractor/supplier contracts

have Whistleblowing Reporting Channel included as part of the Code of Conduct

## Future initiatives

In 2026, we will continue to ensure the whistleblowing reporting process meets all legal requirements and remains accessible to our stakeholders.

# Anti-corruption

## POLICY

In addition to our Code of Conduct, QENERGY has published the Anti-Bribery and Anti-Corruption Policy which gives guidance to our employees and our business partners by identifying the potential risks related to bribery and corruption and establishing their obligations. QENERGY's Management is responsible for employee adherence to the policy and organisational compliance.

## Practice

The Anti-Bribery and Anti-Corruption Policy has been drafted by the Compliance Officer of QENERGY, who manages any inquiries related to this Policy and is responsible for checking internal control systems and procedures to ensure its effectiveness.

Settlements concluded by QENERGY with a third party (including actual and potential clients, suppliers, investors, advisers, as well as government and public officials and politicians including their advisors and representatives and public parties) are subject to clear contractual terms in which anti-bribery and anti-corruption clauses are included where necessary.

As an international company, the laws applicable to QENERGY include, but are not limited to:

- United States Foreign Corrupt Practices Act of 1977
- UK Bribery Act issued in the United Kingdom in 2010
- United Nations Convention against Corruption
- OECD Convention on Combating Bribery of Foreign Officials in International Business
- Loi Sapin 2, n°2016-1691 du 9 décembre 2016 relative à la transparence, à la lutte contre la corruption et à la modernisation de la vie économique (France)
- Ley Orgánica 10/1995, de 23 de noviembre, del Código Penal (Spain)
- Decreto-Lei n.º 400/82, de 23 de setembro, que aprova o Código Penal (Portugal).

## Metrics

0

**convictions incurred for the violation of anti-corruption and anti-bribery laws**

0

**total amount of fines incurred for the violation of anti-corruption and anti-bribery laws**

## Future initiatives

QENERGY will continue to promote a culture of integrity and ethical business conduct through regular communication and employee awareness activities. Future initiatives will focus on maintaining transparency, reinforcing internal controls, and ensuring that all employees remain informed about expected standards of behaviour.

## Revenues from Controversial Sectors

QENERGY does not have revenues from any of the sectors below, nor has it been excluded from any EU reference benchmarks that are aligned with the Paris Agreement as defined by Article 12.1 and 12.2 of the Commission Delegated Regulation (EU) 2020/1818:

- Controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, and biological weapons);
- The cultivation and production of tobacco;
- Fossil fuel (coal, oil, and gas) sector (i.e. the undertaking derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council 17), including a disaggregation of revenues derived from coal, oil, and gas; or
- Chemicals production if the undertaking is a manufacturer of pesticides and other agrochemical products.

# Information Security

## Cybersecurity

### POLICY

**QENERGY's cybersecurity framework is based on two core policies: the Cybersecurity Policy for Information Technology (IT) and the Information Security Policy for Operational Technology (OT). These policies apply to all employees, contractors, and third-party service providers, and are available upon request.**

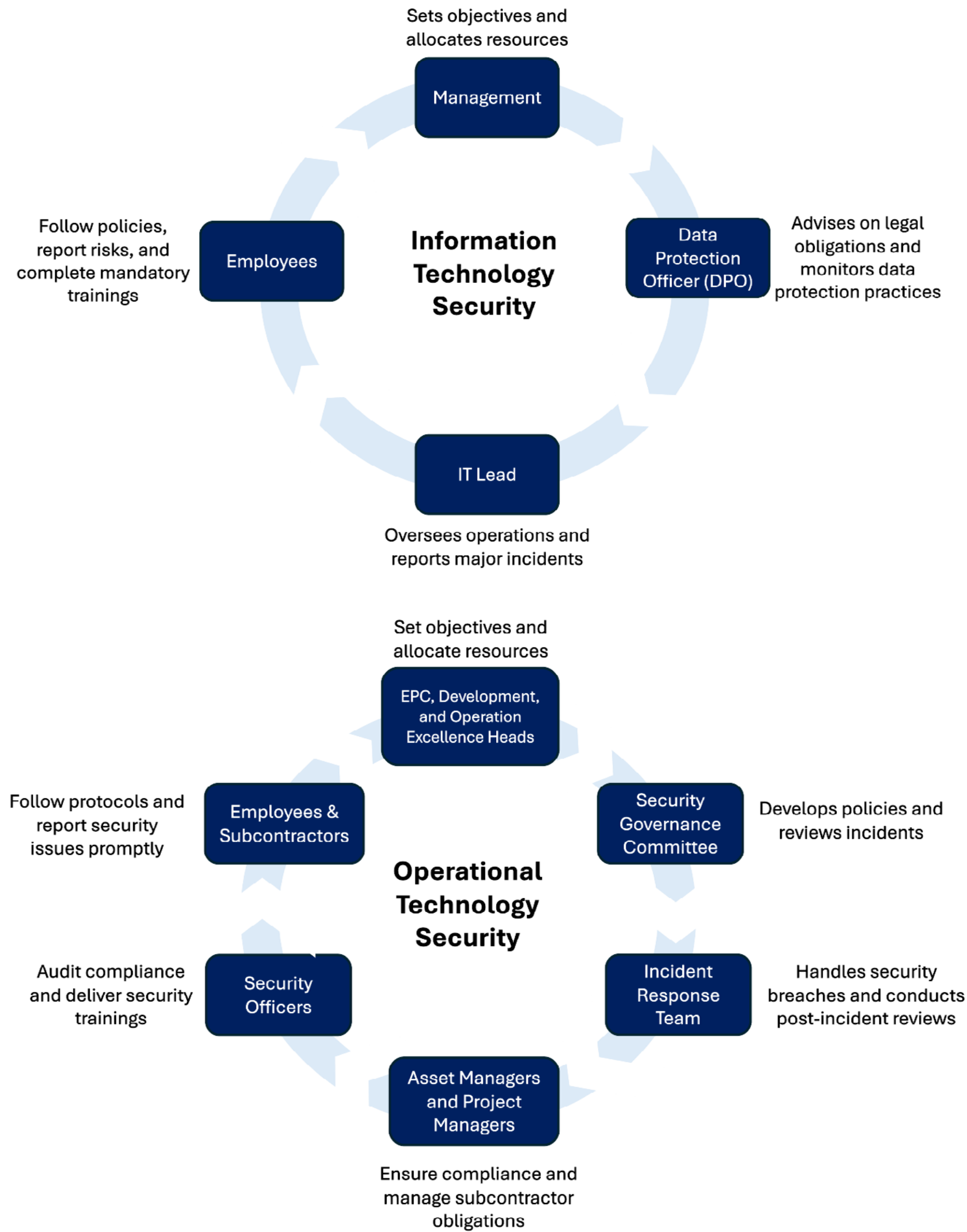
## Practice

The cybersecurity framework covers both IT systems and OT systems. The *Cybersecurity Policy for Information Technology* aligns with the NIS2 Directive, ensuring protection of critical infrastructure and continuity of essential services. The *Information Security Policy for Operational Technology* safeguards the confidentiality, integrity, and availability of information related to our renewable energy projects.

Both policies include processes for incident detection, response plan, and reporting. Risk management includes regular security assessments, employee/subcontractor training, and third-party due diligence. Security awareness is fostered through dedicated training, exercises, practical tips, and ongoing evaluation of programme effectiveness.

While the framework is led by the Digital Transformation Department, it relies on close collaboration with key business departments, oversight from management, and support from the Compliance team. The following graphs outline roles and responsibilities within our cybersecurity structure.

## Governance



Roles and responsibilities in cybersecurity workstreams

## Metrics

**100%**  
of new employees completed mandatory security awareness training

**5**  
signed subcontractor agreements included cybersecurity requirements

Methodological notes: The cybersecurity requirements are based on international standards such as ISO 27000 series, IEC 62443, and NERC 1300.

## Future initiatives

In 2026, the Digital Transformation Department, in close collaboration with the Operational Excellence Office, plans to implement an ISO 27001-certified system. This initiative will be aligned with other ISO certifications pursued at group level.

# Data Protection

## POLICY

**Our Data Protection Policy and practices are an integral part of our operations, and in line with the EU General Data Protection Regulation (GDPR), which is directly applicable in all EU member states. Our policy and practices are continuously updated to meet evolving data protection and security regulations, processes, and technologies.**

## Practice

At Q ENERGY, safeguarding personal data, privacy, and information security is an integral part of how we operate. We are committed to maintaining high standards in data protection and have appointed a dedicated Data Protection Officer (DPO) to oversee compliance with relevant regulations, including the EU GDPR.

Our practices include keeping detailed records of data processing activities and implementing strict access controls for our systems, servers, and internal documents. These controls are supported by a clear data deletion policy to ensure that personal data is only retained for as long as necessary. Regular risk assessments and audits help us identify and address potential vulnerabilities in our systems, while internal audits provide an additional layer of oversight.

We also provide regular training and guidance to departments handling sensitive information, strengthening awareness, and accountability across the company. Third-party providers are carefully vetted through due diligence and strong contractual agreements to ensure they meet our data protection standards. Privacy information is systematically integrated into key materials such as contracts, websites, reports, and surveys.

## Governance



### Governance & Compliance

Ensuring GDPR compliance, maintaining data records, and overseeing privacy policies.



### Controls & Response

Managing access, enforcing deletion protocols, and handling incidents securely.



### Risk & Awareness

Identifying data risks, conducting audits, and training teams on data protection.

Overview of data protection responsibilities

## Metrics

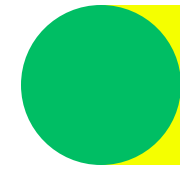
# 3

**data protection trainings developed for key functions and general staff**

## Future initiatives

As mentioned in the *Cybersecurity* subchapter, we will implement the ISO 27001 processes in 2026. The DPO, supported by the General Counsel Office, will oversee data protection audits and organise mandatory training for key departments, such as Digital Transformation, HR, and Finance, as well as general awareness training for all employees.

# About the Report



## General Basis for Preparation of Sustainability Statements

### Reporting Scope and Data Consolidation Methodology

This report has been prepared in accordance with VSME as recommended by the European Commission. Additional disclosures have been made based on selected provisions of the ESRS, as well as investor requests received between January 2024 and May 2025.

Specifically, we have applied the following approach:

- For VSME-related data points, we applied both the Basic Module and Comprehensive Module.
- The report has been prepared on a consolidated basis, covering the entire QENERGY Group.
- Unless otherwise noted in the accompanying notes alongside the metrics, the report covers activities during the 2025 calendar year for projects and offices under QENERGY's operational control, including the value chain activities.
- Detailed geolocation data of project sites have not been published due to business sensitivity and confidentiality considerations. Location data may be shared upon justified request, subject to appropriate confidentiality safeguards.

The site-related reporting scope includes 1,251.57 MW of projects under construction in Spain, France, Italy and the UK consisting of 73.4 MW of wind projects, 1,127.77 MW of PV projects and 50.4 MW of repowering projects.

### Disclosures in Relation to Specific Circumstances

Where topics were identified as material through our DMA, as detailed in the *ESG Management and Material Topics* subchapter, we provide topic-specific chapters outlining practices, policies, and future initiatives.

In cases where precise data was unavailable, assumptions, approximations, and extrapolations were made, based on representative historical data, sector averages, regional averages, or self-declared estimates. Where relevant, assumptions and methodologies are detailed in accompanying methodological notes. We remain committed to strengthening data accuracy and transparency through continuous engagement with employees and supply chain partners.

As the ESG Report 2025 was published before the Financial Report 2025, indicators relying on financial data — such as turnover, size of the balance sheet, and emission intensity per turnover — were not finalised at the time of publication. Readers are referred to the forthcoming Financial Report for the most recent financial information.

### Risk Management and Internal Controls over Sustainability Reporting

To manage risks of material misstatement and reporting inaccuracies:

- In 2024, various departments and external experts were involved in the DMA, report drafting, and review processes.
- For environmental data, we established an evidence robustness system to document data quality. Evidence provision requirements have also been integrated into supplier contracts where possible.
- For non-environmental data, we promote the use of source documentation during data collection and try to involve more than one colleague within each workstream for data validation and review.

Since the drafting of the ESG Report 2024, two internal indicator reviews have taken place:

- December 2024 – January 2025: The ESG workstream identified improvement areas and integrated new indicators into yearly operational planning with relevant teams.
- April – May 2025: A second review by the ESG workstream, Group General Counsel, and the CEO addressed new priorities based on updated regulations, market trends, and investor expectations.

During the preparation of the ESG Report 2025, multiple rounds of targeted internal reviews were conducted within each relevant office, department, and team. In addition, the CEO, ESG workstream, Investment Division, and regional Legal Departments reviewed the full draft to ensure that our sustainability reporting is reliable, credible, and relevant.

# Other ESG Disclosures at a Glance

## Basis for Preparation

Disclosure requirement	Disclosure
Subsidiaries	<ul style="list-style-type: none"> <li>QENERGY Europe GmbH: Hildegard-Knef-Platz 3, 10829 Berlin, GERMANY</li> <li>QENERGY France SAS: 330 Rue du Mourelet, Z.I de Courtine, 84000 Avignon, FRANCE</li> </ul>
Undertaking's legal form	Private limited liability undertakings
NACE sector classification code(s)	D – 35.1.1: Production of electricity

Methodological notes: Subsidiaries without employees, such as special purpose vehicles (SPVs) established solely for project ownership or financing purposes, are excluded from this table.

## Location of Primary Operations

Country	City	Postal code	Geolocation
Germany	Berlin office	10829	52° 28' 35.747" N, 13° 21' 48.062" E
France	Avignon office	84000	43° 55' 57.148" N, 4° 46' 36.423" E
	Paris office	92400	48° 53' 38.077" N, 2° 14' 37.386" E
	Nantes office	44200	47° 12' 12.931" N, 1° 33' 53.146" W
	Lyon office	69100	45° 46' 33.476" N, 4° 51' 37.085" E
	Bordeaux office	33800	44° 49' 16.574" N, 0° 33' 6.268" W
Spain	Toulouse office	31100	43° 34' 43.929" N, 1° 22' 48.593" E
	Montpellier office	34470	43° 34' 45.934" N, 3° 56' 23.826" E
	Madrid office	28046	40° 27' 5.922" N, 3° 41' 29.401" W
Portugal	Seville office	41018	37° 22' 46.796" N, 5° 58' 28.724" W
	Badajoz office	06011	38° 52' 25.791" N, 6° 59' 24.623" W
	Lisbon office	1990-083	38° 46' 13.38" N, 9° 5' 52.58" W
	Porto office	4100-429	41° 10' 18.49" N, 8° 41' 16.759" W

# Glossary of Terms and Abbreviations

BESS – Battery Energy Storage System

CAPEX – Capital Expenditure

CO<sub>2</sub>e – Carbon Dioxide Equivalent

COD – Commercial Operation Date

CSRD – Corporate Sustainability Reporting Directive

CSR – Corporate Social Responsibility

DMA – Double Materiality Assessment

DPO – Data Protection Officer

EIA – Environmental Impact Assessment

EMP – Environmental Management Plan

EPC – Engineering, Procurement, and Construction

ESG – Environmental, Social, and Governance

ESRS – European Sustainability Reporting Standards

GDPR – General Data Protection Regulation

GHG – Greenhouse Gas

GW – Gigawatt

H&S – Health and Safety

HR – Human Resources

IFC – International Finance Corporation

ILO – International Labour Organisation

IT – Information Technology

KBA – Key Biodiversity Area

KYBP – Know Your Business Partner

MWh – Megawatt Hour

MW – Megawatt

O&M – Operations and Maintenance

OPEX – Operational Expenditure

OT – Operational Technology

PV – Photovoltaic

QHSE – Quality, Health, Safety, and Environment

SFDR – Sustainable Finance Disclosure Regulation

UN SDG – United Nations Sustainable Development Goals

UNGC – United Nations Global Compact

VSME – Voluntary Sustainability Reporting Standard for Non-listed Micro-, Small-, and Medium-sized Enterprises

# SDG Content Index



**Description:** We strive to foster a supportive work environment that respects employees' individual circumstances, promotes a healthy balance between work and personal life, and strengthens overall well-being and resilience.

**Chapter:** Own Workforce



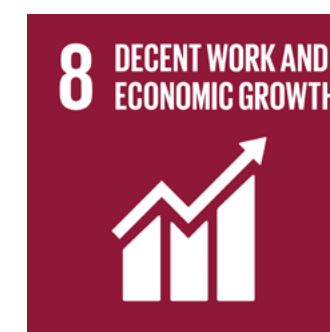
**Description:** We are committed to ensuring equal treatment and opportunities for all employees, including promoting gender equality.

**Chapter:** Own Workforce; Corporate Social Responsibility (CSR)



**Description:** As a renewable developer company, we develop, build, and manage renewable energy assets, directly contributing to ensuring access to affordable, reliable, sustainable, and modern energy for all.

**Chapter:** Our Strategy, Business Model, and Value Chain



**Description:** We are committed to decent and sustained work environment for our employees, subcontractors, and suppliers, by respecting their human rights and ensuring their health and safety.

**Chapter:** Own Workforce; Workers in the Value Chain



**Description:** We support the circular economy by considering the lifecycle impact of our project components and reducing project waste.

**Chapter:** Resource Use and Circular Economy



**Description:** We are committed to combatting climate change and its impact by promoting green energy at scale and understanding our emissions with the aim to effectively reduce them.

**Chapter:** Climate Change



**Description:** We integrate biodiversity considerations into our project lifecycle, balancing the positive and negative impacts of renewable energy infrastructure on ecosystems.

**Chapter:** Biodiversity and Ecosystems

# VSME Content Index

Paragraph reference	Reference page(s)
<b>Basic Module</b>	
<b>General information</b>	
<b>B1 - Basis for Preparation</b>	4-5, 12, 15, 43, 62-65
Basis for Preparation and other undertaking's general information	4-5, 62-65
List of subsidiaries	5, 65
Disclosure of sustainability-related certification(s) or label(s)	12, 15, 43
List of sites	5, 62, 65
<b>B2 - Practices, policies and future initiatives for transitioning towards a more sustainable economy</b>	11-61
Practices, policies and future initiatives for transitioning towards a more sustainable economy	11-61
Cooperative specific disclosures	N/A
<b>Environmental Disclosures</b>	
<b>B3 - Energy and greenhouse gas emissions</b>	17-18
Total Energy Consumption (in MWh)	18
Breakdown of energy consumption (in MWh)	18
Estimated Greenhouse Gas Emissions considering the GHG Protocol Version 2004 (in tCO <sub>2</sub> e)	14-17
Greenhouse gas emission intensity per turnover	17, 63
<b>B4 - Pollution of air, water and soil</b>	N/A
<b>B5 - Biodiversity</b>	21, 25
Sites in biodiversity sensitive areas	21
Biodiversity - Land-use	25
<b>B6 - Water</b>	N/A
Water Withdrawal	N/A
Water Consumption	N/A
<b>B7 - Resource use, circular economy and waste management</b>	26-30
Description of circular economy principles	26-27, 29-30
Waste generated	28

Paragraph reference	Reference page(s)
<b>Social Disclosures</b>	
<b>B8 - Workforce - General characteristics</b>	31, 37
Type of contract	31
Gender	37
Country of employment	31
Turnover rate	31
<b>B9 - Workforce – Health and safety</b>	43
Number and rate of recordable work-related accidents	43
Number of fatalities	43
<b>B10 - Workforce – Remuneration, collective bargaining and training</b>	33
Minimum wage	33
Gender pay gap	-
Employees covered by collective bargaining agreements	33
Annual training hours by gender	-
<b>Governance Disclosures</b>	
<b>B11 - Convictions and fines for corruption and bribery</b>	57
Number of convictions and total fines incurred	57

Paragraph reference	Reference page(s)
<b>Comprehensive Module</b>	
<b>General Information</b>	
C1 - Strategy: Business Model and Sustainability – Related Initiatives	4-6, 10
C2 - Description of practices, policies and future initiatives for transitioning towards a more sustainable economy	9, 11-61
<b>Environmental Disclosures</b>	
C3 - GHG reduction targets and climate transition	18
GHG reduction targets (in tCO2e)	18
Disclosure of list of main actions the entity seeks in order to achieve its targets	14-16
Transition plan for undertakings operating in high climate impact sectors	18
C4 - Climate risks	14
<b>Social Disclosures</b>	
C5 - Additional (general) workforce characteristics	31, 37
C6 - Additional own workforce information - Human rights policies and processes	32-34, 41, 54
C7 - Severe negative human rights incidents	-
<b>Governance Disclosures</b>	
C8 - Revenues from certain activities and exclusion from EU reference benchmarks	57
Revenues from certain activities	57
Exclusion from EU reference benchmarks	57
C9 - Gender diversity ratio in the governance body	37