

NEOEN

SUSTAINABILITY FRAMEWORK

Refining our compass





Neoen is dedicated to a sustainable energy transition



As a company exclusively dedicated to renewable energy, we have environmental sustainability hardwired into our DNA. With each new asset that comes online, we are making an increasingly significant contribution towards global efforts to combat climate change. We launched our Sustainability Framework in 2021 and this new edition recognises our progress and refines our commitments and targets. Our intention is to become 'best in class' by embracing the many opportunities our work presents to contribute

Xavier BARBARO
Group CEO

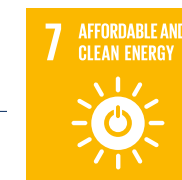
towards the UN Sustainable Development Goals. The framework is intended to guide us, to strengthen our determination and to encourage our team to continue to be audacious in designing and implementing innovative solutions for a more sustainable world.

“ We deliver the most competitively-priced renewable energy, sustainably and at scale. ”



DELIVERING CLEAN ENERGY TO REDUCE EMISSIONS

Neoen combats climate change by developing, owning and operating large-scale wind, solar and battery storage assets around the world. The size of these projects and the scope of our ambition are helping to speed up the pace of transition.



PROMOTING ACCESS TO AFFORDABLE AND CLEAN ENERGY

Neoen's wind and solar projects deliver competitively-priced energy, exerting downward pressure on electricity prices. In Portugal, for example, the Rio Maior and Torre Bela Solar farms were awarded at the extremely competitive price of 23.5€/ MWh*. Similarly, in the midst of the energy crisis in 2022 and 2023, wind and solar power plants contributed more than 25 billion euros to the French government, helping de-escalate rising energy costs. Battery storage also plays its part in cost reduction by providing solutions to network problems. In Australia, the Hornsdale Power Reserve continues to support relatively lower power prices for consumers in the state of South Australia.

* Price at the time of the award

Embracing our broader responsibility

PURPOSE

Our long-term owner-operator business model affords us greater opportunities, and incentivises us to uncover long-term solutions. This unique operating approach helps us advance sustainable practices responsibly, design solutions, engage with communities, and manage our environmental footprint. Such measures are enforced throughout the entire life cycle of our assets.

This new version of our Sustainability Framework outlines ambitions and priorities for our team, our projects, and our interactions with communities. It seeks to combine top-down with bottom-up approaches to encourage good ideas and innovation across our projects and the countries in which we operate.

SCOPE OF APPLICATION

This policy is applicable to Neoen S.A.S, its subsidiaries, and all associated directors, officers, employees, and temporary workers.

This policy has been reviewed and approved by Neoen's Group CEO.

RELATED DOCUMENTS

This Sustainability Framework is supplemented by and should be read in conjunction with the other policies, standards, and guidelines that apply to our business, including:

- Anti-Corruption Code of Conduct	- Circular Economy Policy
- Biodiversity policy	- Human Rights Policy
- Health, Safety, and Environment (HSE) Policy	- Supplier Code of Conduct
	- Tax Policy



Our framework is aligned with the United Nation's Sustainable Development Goals, a collection of 17 interlinked global objectives designed as a roadmap to achieve a better and more sustainable future for all. The goals were set in 2015 by the United Nations General Assembly and are intended to be achieved by 2030.

We have a responsibility and a role to play in achieving these targets.



Our framework is anchored by 3 foundational pillars

Our people

“Speeding up the transition to a more sustainable future”



Our projects

“Striving to deliver excellence in sustainability”



Our communities

“Participating in the transition alongside us”



Our people

We are a company of 440 people working across 15 countries on over 800 projects, from those in development, to those under construction and our operating power plants.

We are bound by a commitment to renewable energy and to accelerating the energy transition.

“ Speeding up the transition to a more sustainable future ”



WORKING ETHICALLY

Our work ethic is sustained by our values, integrity in particular, which live and breathe in myriad ways through the actions of board members, managers and employees. They contribute to a vibrant workplace culture and orient our respectful approach to 'doing business'. We select and work with contractors and suppliers who also respect the same ethical standards.

COMMITMENTS

- 100% of our employees formally commit to Neoen's Code of Conduct
- 100% of our employees formally commit to Neoen's Anti-Corruption code and are trained in the fight against corruption

ENCOURAGING DIVERSITY

Diversity is a source of pride and dynamism for Neoen, with over 48 nationalities represented amongst our team.

Our recruitment process is open to all, upholds the principles of fairness and non-discrimination, and our workplace has zero tolerance to harassment. At the global level, our main priority is addressing gender imbalance in the workforce.

COMMITMENTS

- Reach a target of at least 35% women in the workforce by 2025
- Increase female managerial positions held to 25% by 2025



REDUCING EMISSIONS

The Paris Agreement continues to be an important reference point and we are committed to taking steps towards reducing our emissions.

We want to build and operate more and more renewable power plants all over the world, as it helps replace millions of tonnes of CO₂ emissions from fossil fuel power plants. However, while this is our main contribution to the decarbonisation agenda, we also want to reduce carbon intensity during construction which is when over 90% of our emissions are generated.

We are therefore engaging with our main suppliers to reduce carbon intensity.

COMMITMENTS

- Decrease annually the carbon intensity per MW of new solar, wind or storage installed capacity
- Increase annually the consumption of renewable energy in our own operations

These two initiatives align with our goal of achieving net zero greenhouse gas (GHG) emissions by 2050 or sooner.

Our projects

Our project sites are where we work hand-in-hand with consultants, contractors and subcontractors to develop, build, own and operate our renewable energy power plants.

As well as generating clean electrons to reduce global emissions, our 180 assets are also the crucible for many sustainable initiatives and outcomes at the local and regional level.

“ Striving to deliver excellence in sustainability ”



PRIORITISING SAFETY

Neoen is committed to ensuring the health and safety of its employees and of all those working on its project sites. Identifying risks has led to strict mitigation, control and reporting processes.

We maintain a strong Health, Safety & Environment (HSE) culture on site, ensuring that contractors uphold Neoen’s expectations and comply with the health and safety legislation and requirements. A 'stop of work' notice can be exercised when it is considered that an issue could endanger the health or safety of employees, contractor or subcontractor staff or members of the local community.

COMMITMENTS

- Pursue the objective of zero high risk incident and maintain a Lost Time Injury Frequency Rate* below 2
- Conduct HSE compliance audits on 100% of our sites under construction (quarterly on sites over 20 MW in size, every 2 months on smaller sites) and annually with our operating contractors

* number of lost time injuries per million work hours

PROTECTING BIODIVERSITY

Neoen’s environmental stewardship is evident at the project level. As detailed in our Biodiversity Policy, we undertake Environmental Impact Assessment at our project sites during the development phase and manage the potential impacts following the Mitigation Hierarchy principles of avoid, minimise, restore and offset, with an aim of minimising net loss of biodiversity.

COMMITMENTS

- Conduct an environmental impact assessment during development on 100% of our solar and wind assets
- Each project > 50 MW selects one "above and beyond" biodiversity initiative*

15 LIFE ON LAND



* Not required under local regulations



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



ADVANCING CIRCULARITY

As a leading player in the renewables sector, we have a responsibility to promote the circular economy, to encourage the production of goods and services in a sustainable manner, limiting our consumption of raw materials and non-renewable energy.

Our Circular Economy Policy outlines our commitments across the project lifecycle in relation to waste management, recycling and decommissioning of any power plants. We continue to embed a recycling commitment clause into all new supply agreements in countries with a mature* recycling industry.

COMMITMENTS

- Integrate a recycling commitment clause into supply services agreements for a total of 1.3 GW (2024+2025)
- Implement waste management plan for 100% of our projects by 2025 to minimize waste generation and maximise reuse and recycling

* And when we have no other option, we dispose of waste responsibly

Our communities

As an owner-operator, we are privileged to become long-term neighbours to the communities surrounding our sites. We work in consultation and cooperation with local stakeholders, contribute to local and regional

economic development, and seek to share the benefits of the transition with our project communities.

“Participating in the transition alongside us”



CONSULTING & ENGAGING

Neoen is convinced that the success of a project is dependent to a large extent on developing genuine, open and ongoing relationships with key stakeholders and members of the local community.

We recognise the importance of ensuring a ‘no surprises’ dynamic and are committed to engagement that starts early, is tailored to the local context and provides opportunities for the community to participate in the project’s development and planning process.

COMMITMENTS

- Conduct community consultation and information-sharing on all projects* even if it's not mandated
- Consult and engage with First Nations communities in countries and regions where there are Traditional Custodians

* Excluding extensions within the same perimeter

ECONOMIC DEVELOPMENT

The construction and operation of our projects has the potential to deliver significant local and regional economic development through (i) the creation of direct and indirect jobs (ii) supply chain outcomes and (iii) opportunities for skills development, training and apprenticeships.

There is also a multiplier effect as income and spending circulate through the wider economy.

COMMITMENTS

- Engage with local businesses and employment networks, prioritising local suppliers and jobseekers where possible
- Track the number of worked hours, and the total amount of benefit-sharing initiatives supported by Neoen



BENEFIT-SHARING

Neoen is dedicated to ensuring that the benefits of the energy transition are shared with local communities. The term "benefit-sharing" covers a range of community development initiatives that are a product of a country's traditions, a community's need, people's ideas and that makes sense in the local context.

COMMITMENTS

- Develop a benefit-sharing initiative for each new project over 50 MW
- Create an artwork that celebrates renewable energy and local culture for each new project over 50 MW



*“Speeding up the
transition to a more
sustainable future”*

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