

Declaration of principle

Our commitment to respecting human rights and environmental standards along ABO Energy's global supply and value chains

ABO Energy attaches great importance to ethical, socially responsible and legally compliant business practices. The company's core business is the development of a sustainable, environmentally friendly energy supply. We generate almost 100 per cent of our turnover from activities that also contribute to achieving the sustainability goals of the United Nations.

We are therefore very aware of our corporate responsibility to respect human rights and the environment. We are therefore committed to respecting human rights and the associated environmental standards in our own business activities and in our global supply and value chains and to providing those affected by human rights and environmental violations with access to remedies.

In doing so, we align our business activities with the internationally recognized United Nations Guiding Principles on Business and Human Rights and thus implement the requirements of the National Action Plan for Business and Human Rights.

In addition, our understanding and our due diligence processes are based on the following international human rights reference instruments, to which we are committed:

- The International Bill of Human Rights, i.e. the United Nations Universal Declaration of Human Rights as well as the Civil and Social Covenants, which define civil, political and social rights to which all people are entitled for the sake of their dignity.
- The core labour standards of the International Labour Organization (ILO) with their four basic principles on freedom of association and the right to collective bargaining, the elimination of forced and child labour and the prohibition of discrimination in respect of employment and occupation.
- We expect our business partners to also commit to respecting human rights and environmental standards, to establishing appropriate due diligence processes and to passing these expectations on to their own suppliers.

The policy statement applies to ABO Energy GmbH & Co. KGaA and its subsidiaries worldwide.

Wiesbaden, 20.12.2024

A handwritten signature in dark ink, appearing to read 'K. Schlageter'.

Dr Karsten Schlageter

A handwritten signature in dark ink, appearing to read 'J. Ahn'.

Dr Jochen Ahn

A handwritten signature in dark ink, appearing to read 'M. Hollmann'.

Matthias Hollmann

A handwritten signature in dark ink, appearing to read 'Susanne von Mutius'.

Susanne von Mutius

A handwritten signature in dark ink, appearing to read 'A. Reinicke'.

Alexander Reinicke

A handwritten signature in dark ink, appearing to read 'Thomas Treiling'.

Dr Thomas Treiling

Contents

1. Responsibility and governance	3
2. Human rights and environmental strategy	3
3. Risk analysis	5
4. Preventive measures	5
5. Remedial measures	6
6. Complaints procedure	6
7. Effectiveness control	6
8. Documentation and reporting obligations	7

1. Responsibility and governance

We have anchored the overarching responsibility to comply with human rights and environmental concerns in our business activities as well as in the supply and value chain and to monitor the associated measures at the highest management level, the Executive Board of ABO Energy GmbH & Co.

Regular and ad hoc internal reporting to the Executive Board on the results of our risk analyses relating to human rights and the environment, information from our grievance mechanisms and information on the effectiveness of our remedial and preventive measures ensures that the Executive Board can make informed decisions.

ABO Energy has defined processes as part of a risk management system for the implementation of the German Supply Chain Due Diligence Act (LkSG) so that the resulting due diligence obligations are bindingly considered in the operational processes by the respective responsible divisional management.

2. Human rights and environmental strategy

ABO Energy plans and builds wind farms, solar parks, battery and hydrogen projects worldwide. For more than 25 years, we have been doing business with the overriding goal of securing a future worth living for future generations. We are committed to this goal with our entrepreneurial activities.

In order to ensure legally compliant behavior for our business activities and our global supply chain, we have adopted a Code of for our globally active employees ([ABO-Energy Code-of-Conduct.pdf](#)) and, based on a risk-orientated approach, our suppliers are contractually obliged to comply with our Supplier Code of Conduct ([Supplier Code of Conduct.pdf](#))

We are committed to respecting all internationally recognized human rights and focus our due diligence processes in particular on human rights and environmental issues that we have identified as material for our company through a risk analysis.

We see the greatest risks of adverse effects on people and the environment that are directly or indirectly related to our business activities and the associated global supply chain in the following areas:

- Forced and child labour
- Restrictions on freedom of assembly and association
- Discrimination in any form
- Endangering data protection and privacy
- Antitrust offences, corruption and bribery
- Health and safety hazards in the workplace
- Damage to health and the environment due to water, soil or air pollution

To ensure respect for human rights and environmental concerns, we have embedded human rights due diligence processes as an integral part of our organization and in our relationships with our business partners

The majority of our employees are covered by collective labour agreements and have social security. Our large local companies have employee representative organisations. We have set out our

commitment to human rights and ILO labour standards in our Code of Conduct and we monitor compliance with these through risk-oriented audits using our management processes. Further information can be found on our website: [ISO 9001 Certificate.pdf](#)

Occupational health and safety is also very important to us. We carry out risk analyses in this area, continuously monitor relevant occupational safety aspects and have established measures to increase the occupational safety of our employees. Further information can be found on our website: [ISO 45001 Certificate.pdf](#)

The provisions on health and safety aspects also apply to our contractors and external companies. We have also enshrined a general ban on discrimination in our Code of Conduct.

By establishing an environmental management system based on our environmental guidelines, we have examined the main environmental impacts of our business activities and successively optimized our environmental and climate-relevant processes and developed strategies to conserve resources and reduce greenhouse gas emissions for energy, water, waste, mobility and procurement. Further information can be found on our website under environmental guidelines: <https://www.aboenergy.com/en/company/esg.html>

As part of our environmental management, ABO Energy has been working for many years to operate sustainably and make a positive contribution to climate protection. The active implementation of ESG issues in our daily work plays a key role for us. In this context, ABO Energy has also been participating in the ESG initiative ÖKOPROFIT of the city of Wiesbaden with its Wiesbaden headquarters every year since 2016. Further information can be found on our website under Environmental Guideline - ESG Initiative ÖKOPROFIT: <https://www.aboenergy.com/en/company/esg.html>

In addition, we have our sustainability processes independently assessed by *imug Beratungsgesellschaft mbH*. Further information can be found on our website: [imug_rating Sustainability Rating.pdf](#)

We consider it an important part of the implementation of due diligence obligations to sensitize our employees to respect for human rights and environmental concerns and to provide them with the necessary expertise for the effective implementation of due diligence processes. We therefore organize regular, mandatory training and further education measures within our company in the form of training courses to communicate these topics to our employees and to effectively train employees with operational responsibility in potential conflict situations.

We are also committed to continuously developing our processes regarding human rights and environmental concerns. For this reason, stakeholder involvement is another important element of responsible corporate governance.

3. Risk analysis

To increase the social acceptance of our business activities, we evaluate our activities in terms of sustainability. To do this, we need to understand the demands and expectations of different interest groups regarding our company, take these interests into account when making decisions and communicate them transparently.

We therefore consider it part of our duty of care to recognize potential and actual adverse human rights and environmental risks and impacts of our business activities along the entire value chain.

We therefore use our risk management process to identify and assess the relevant issues relating to our business activities and our direct and indirect business relationships. This includes analyzing both human rights and environmental risks as well as their impact through the construction of our global wind and solar parks and the implementation of our battery and hydrogen projects.

To this end, we have systematically added human rights and environmental issues to our company-wide risk and supplier management system. The risk analysis is updated annually and whenever there are significant changes to the company profile or business activities. To this end, we involve internal and external experts, business partners and selected stakeholders, including representatives of groups that are actually or potentially affected.

The results of the risk analysis and impact are incorporated into our corporate decision-making processes regarding supplier selection, business partner management, product responsibility and development as well as mergers and acquisitions. The risk analysis forms the basis for identifying appropriate measures. The management regularly discusses human rights and environmental conflicts of interest and relevant findings from our due diligence processes. In addition, we use the results as a basis for creating and, where necessary, adapting internal regulations, processes and training to meet the changing requirements of our due diligence processes.

4. Preventive measures

To fulfil our responsibility to respect human rights and environmental concerns, we rely on a combination of different measures. The aim is to protect the (potentially) affected persons and the environment and to prevent or at least minimize adverse effects.

We have established standardized processes for this purpose. We actively and systematically involve rights holders (such as employees and workers of suppliers or local communities), regularly exchange information with other companies, including as part of industry initiatives, and cooperate with stakeholders to promote the realization of human rights and environmental concerns. The concerns expressed by rights holders, or their legitimate representatives, local stakeholders, experts and civil society are taken into account.

Outside our company, we contractually oblige our direct business partners in a risk-oriented manner to comply with the laws applicable in the respective country and the core labour standards of the ILO, to respect human rights and the environment and to address these risks appropriately with their own business partners.

5. Remedial measures

In the event that our business activities contribute to or are indirectly linked to potential or actual human rights violations or environmental damage, we endeavour to contribute to appropriate remediation and prompt redress by the responsible parties.

If we have a justified suspicion or concrete indication of possible human rights violations or environmental damage in our company or along our upstream and downstream value chain, we follow this up carefully and consistently. Depending on the severity of the violation, we reserve the right to take appropriate action in relation to our business partners, from requesting the immediate rectification of the violation to taking legal action and even cancelling the business relationship. Irrespective of this, we work towards remedying the breach.

6. Complaints procedure

Appropriate and effective complaints management is an important part of our due diligence processes to effectively prevent and remedy any potential adverse effects caused by our company and our business activities.

We therefore operate a whistleblower system ([Crefowhistle](#)) that provides a confidential communication channel for internal and external stakeholders and all potentially affected parties worldwide to report possible violations. Opportunities to access the whistleblowing system are communicated proactively and in appropriate language to these groups to take account of differences in the target groups. Reports can also be made anonymously. All reported information and substantiated suspicions of possible violations are processed as part of a transparent, balanced and predictable process for all parties involved. The confidentiality and anonymity of whistleblowers is respected. As far as possible and within our sphere of influence, we ensure that whistleblowers are protected from discrimination and penalisation in connection with the complaints they submit. Further information can be found on our website: [Whistleblowing guide and reporting channels.pdf](#)

7. Effectiveness control

We review the effectiveness of our measures to prevent and mitigate adverse human rights and environmental impacts at least once a year and on an ad hoc basis.

Within our company, we carry out risk-based audits, investigate all reports of potential human rights violations and environmental offences and check the effectiveness of training and further education measures using comprehension questions during training or final tests.

We review the effectiveness of measures in our value chain by monitoring the results of our continuous analysis of human rights and environmental risks and impacts and adapting our processes accordingly. For example, we carry out a risk-based business partner review of our direct suppliers, which also takes sustainability aspects into account.

We are also certified to ISO standards 9001 (Quality Management/[ISO 9001 Certificate.pdf](#)) and (Occupational safety/[ISO 45001 Certificate.pdf](#)) and have had our sustainability management assessed by an independent research and rating agency. Further information can be found on our website: [imug rating Sustainability Rating.pdf](#)

8. Documentation and reporting obligations

ABO Energy aims to provide all target groups with comprehensive and comprehensible information about the company and its strategy, the market environment and business development. To this end, ABO Energy publishes a detailed annual report on the past financial year. This includes the audited consolidated annual results and the unaudited half-year financial statements. ([Annual Reports](#))

From 2025, ABO Energy will be subject to sustainability reporting in accordance with the ESRS standards of the CSRD Directive (Corporate Sustainability Reporting Directive), so that the first legally required CSRD report will be published in 2026 for the 2025 financial year. As part of this reporting, the materiality analysis with its sustainability-related impacts, risks and opportunities for ABO Energy will be disclosed.