SUNOTEC Environmental and Social Policy

Version 1.0

Purpose

SUNOTEC's mission is to enable the rapid and efficient deployment of renewable, low-carbon energy worldwide. While our operations—including the manufacturing, construction, and procurement of PV and battery components, as well as the development, operation, and maintenance of solar plants—do have significant environmental and social impacts, they also present valuable opportunities to mitigate those impacts and make meaningful, positive environmental and social contributions overall.

With all this in mind, it is hugely important that we manage environmental and social aspects respectively, and our Environmental and Social Policy sets out the key principles we follow in the process.

Scope of application

The Policy applies to SUNOTEC Holding and all its subsidiaries.

Relevant standards and requirements

- European Sustainability Reporting Standards (ESRS)
- National environmental regulations
- National labour laws and regulations
- SUNOTEC's Sustainability Strategy

Overall commitments

1. SUNOTEC will comply with all applicable legal requirements or exceed them.
2. SUNOTEC will proactively identify, assess and mitigate environmental and social risks.

Environmental commitments

Operations

1. SUNOTEC will work to reduce greenhouse gas emissions from its operations to net zero by 2050 and will continue to measure and report every year.
2. SUNOTEC will proactively avoid any negative impacts on ecosystems and biodiversity, invest in protection initiatives and in rare cases in which these can't be avoided – offset any losses.
3. SUNOTEC will manage land use change responsibly and will aim to keep disruptions to a minimum.
4. SUNOTEC will continuously work to reduce its water footprint, protect ground water resources, avoid disrupting river flows and where possible implement water preservation measures in operations.
5. SUNOTEC will follow good waste management practices, separate 100% of non-hazardous waste, as well as ensure proper disposal in every situation.
6. SUNOTEC will strive to maintain its use of hazardous chemicals and output of hazardous waste to a minimum, as well as dispose of any amounts we produce responsibly.
7. SUNOTEC will continuously work to reduce outdoor air pollution through respective construction practices and company fleet electrification.
8. SUNOTEC will continue to foster environment-conscious employee culture, provide regular training.
9. SUNOTEC will promote a sustainable consumption culture at its premises.

Value chain

1. SUNOTEC will scrutinize its subcontractors and suppliers to fulfil certain environmental practices criteria (see the Supplier Code of Conduct at: https://sunotec-group.com/supplier-coc for more information).
2. SUNOTEC will actively promote sustainable sourcing practices among our suppliers, ensuring that all raw materials used in our operations are procured responsibly.

Social commitments

Operations

1. SUNOTEC will uphold human rights within all our operations, ensuring fair treatment and ethical conduct for all our employees, and strictly prohibiting forced and child labour.
2. SUNOTEC will comply with labour laws and standards, guaranteeing fair wages, reasonable working hours, work-life balance and secure employment.
3. SUNOTEC will prioritise the health and safety of all employees, ensuring protective measures, training, and resources are in place to maintain safe working conditions both in administrative offices and on-site locations and administrative offices.
4. SUNOTEC will actively promote equal treatment and opportunities for all employees. We are committed to fostering the employment and inclusion of persons with disabilities and advancing gender equality, including implementing practices to ensure equal pay for equal work.
5. SUNOTEC will enforce a zero-tolerance policy for discrimination in any form and ensure that anti-discrimination practices are embedded in all operations and processes, including hiring, promotion, and professional development.
6. SUNOTEC will invest in continuous training and skills development to empower our workforce, ensuring that all employees have access to opportunities for professional growth and advancement.
7. SUNOTEC will implement strict policies and proactive measures to prevent violence and harassment, ensuring a safe and respectful workplace for all employees.
8. SUNOTEC will uphold the highest standards of data privacy, ensuring the protection and confidentiality of all employee data, and complying with relevant data protection regulations.

Value chain

1. SUNOTEC will ensure that human rights are respected and promoted among all workers in our value chain, including all our subcontractors, including a zero-tolerance for forced and child labour, and striving for fair treatment and ethical labour practices throughout our supply network.
2. SUNOTEC will require and support compliance with fair labour laws and standards in our value chain, including all our subcontractors, advocating for fair wages, safe working conditions, and reasonable working hours for all workers.

Local communities

1. SUNOTEC will build strong relationships with communities around our operations, supporting positive social impacts through strategic initiatives, partnerships and investments.
2. SUNOTEC will carefully assess and minimize land-related impacts, prioritizing the safety and security of communities potentially affected by our operations.
3. SUNOTEC will safeguard communities' civil rights, respecting freedom of expression. We stand firm in our commitment to uphold human rights in every community we engage with.

At SUNOTEC, we integrate these objectives into our business planning, decision-making, performance tracking and governance processes to ensure we achieve our goals and continually improve them. Many of these aspects are managed by a designated Management System on an entity level.

Certain SUNOTEC entities have Management Policies, which include Environmental, Health and Safety, and Cybersecurity aspects. Other standalone policies related to the respective Management Systems covering social, energy management, road safety and anti-bribery aspects are also available on our website at: https://sunotec-group.com/policies.

All the certificates for these Management Systems grouped by SUNOTEC entity are available at: https://sunotec-group.com/certificates.

While the accountability of SUNOTEC's Management Systems rests with top management, each employee has an individual responsibility to understand and support our Environmental and Social policy and to actively participate in training and programs to ensure our goals are achieved.

SUNOTEC will periodically review and update this policy to address changes in material environmental issues.

Kaloyan Velichkov, CEO

Bernhard Suchland, CEO

Date of last update	Summary of changes	Changes made by
18.08.2025	Policy created	Dimitar Dimitrov, Head of Sustainability, SUNOTEC