

# Sustainability Policy

## Amara NZero Group

April 24, 2025

### 1. Introduction

Sustainability and contributing to the energy transition are at the heart of Amara NZero's strategy.

To this end, Amara NZero Group ("**Amara NZero**" or the "**Group**") identifies, assesses, mitigates, and, where possible, avoids the negative impact that its economic activity may have on the environment or the social sphere it impacts.

Amara NZero's Environmental, Social, and Governance ("**ESG**") mission is to ensure the incorporation of ESG issues into its business practices and to contribute to achieving its business goals.

Its approach aligns with recognized international standards and norms, including the UN Universal Declaration of Human Rights, the ILO Fundamental Principles and Rights at Work, and the UN Global Compact, as well as established internal policies and procedures.

Following international best practices, Amara NZero links its development to the goals defined by the United Nations 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs), with particular emphasis on goals seven (affordable and clean energy), eight (decent work and economic growth), nine (industry, innovation and infrastructure), and thirteen (climate action).

### 2. Purpose and Scope

This ESG Policy (the "**Policy**") defines the basic principles that Amara NZero assumes in its relations with all its stakeholders, guiding the management of sustainability and promoting the integration of best practices into its business model. The Policy aims to align the Group's activity with respect to environmental, social, and corporate governance (ESG) factors in decision-making.

The scope of this Policy applies to all employees, legal entities, and business units of Amara NZero Group without prejudice to the approval of their own ESG Policy, which must remain aligned with the principles outlined herein.

This Policy also applies to those who are bound, directly or indirectly, to Amara NZero through a consultancy or service agreement.

Additionally, it extends to all stakeholders, particularly clients, suppliers, and the local communities where the Group operates.

### 3. Sustainability Governance

Amara NZero will maintain a robust governance structure to integrate and oversee Environmental, Social, and Governance (ESG) principles across the organization. These structures will support the Group's commitment to sustainability, ethics, and long-term value creation. The governance framework will align with international standards, ensuring ESG considerations are central to strategic decision-making.

#### 3.1. ESG Committees

##### a) Sustainability and Risk Committee

- Oversees ESG strategies, aligning with frameworks like the UN Global Compact and Paris Agreement.
- Manages material ESG risks, integrates ESG into operations, and ensures compliance with sustainability goals.
- Reports ESG performance and risks directly to the Board of Directors.

##### b) Green Finance Committee

- Guides green financing, including green bonds and sustainable financial instruments.
- Ensures compliance with standards like the Green Bond Principles (GBP) and EU Taxonomy.
- Secures funding for sustainability-aligned projects.

##### c) Compliance Committee

- Ensures adherence to regulatory and ethical standards across operations.
- Oversees internal policies such as the Code of Conduct, Anti-Bribery Policy, and Whistleblowing Policy.
- Promotes accountability and compliance with labor, environmental, and anti-corruption laws.

#### 3.2. Policy Approval and Review

- The ESG Policy will be reviewed annually by the Sustainability and Risk Committee, with input from other committees.
- Final approval by the Board ensures alignment with strategic goals and global best practices.

#### 3.3. ESG in Corporate Governance

- ESG performance and initiatives will be discussed by the Board of Directors for consistent oversight.
- Cross-functional collaboration among committees will ensure ESG is integrated into decision-making and operations.

## 4. Sustainability Strategy and Priorities

Amara NZero will define its ESG strategy around three key pillars: Environmental, Social, and Governance. This strategy will prioritize the following areas to be aligned with international frameworks:

- **Environmental:** The Group will focus on climate action, including reducing carbon emissions, enhancing energy efficiency and promoting renewable energy adoption.
- **Social:** Efforts will include fostering a diverse and inclusive workplace, safeguarding human rights across the value chain and ensuring health and safety for all employees.
- **Governance:** The Group will implement rigorous compliance measures, promote transparency and uphold the highest ethical standards in its operations.

Double materiality assessments will be conducted periodically to identify and address the most critical ESG issues for the business and its stakeholders.

## 5. Environmental Commitments

Amara NZero will commit to minimizing its environmental impact by:

- **Emissions:** measuring greenhouse gas emissions (Scopes 1, 2, and 3), reducing these where feasible, and evaluating the possibility to set science-based emissions reduction targets.
- **Circular economy:** promoting circular economy principles by optimizing resource use and minimizing waste.
- **Biodiversity protection:** assessing potential impact on biodiversity and ecosystems in areas where Amara NZero operates and avoiding or reducing negative impacts as far as possible.

## 6. Social Commitments

Amara NZero will prioritize social responsibility through:

- **Diversity, Equity, and Inclusion (DE&I):** Establishing policies to promote equal opportunities and diversity at all organizational levels.
- **Human Rights:** Ensuring compliance with the UN Guiding Principles on Business and Human Rights and addressing labor standards in line with ILO conventions.
- **Health and Safety:** Implementing best practices for occupational safety and encouraging ISO 45001 certification to safeguard employee well-being.
- **Community Engagement:** Investing in programs that generate shared value and support sustainable development in local communities.
- **Responsible Supply Chain Management:** Monitoring ESG risks and compliance in the supply chain.

## 7. Governance Commitments

Amara NZero will uphold strong governance practices by:

- **Regulatory Compliance:** ensuring compliance with all relevant laws, regulations, and international frameworks such as the UN Global Compact.
- **Whistleblowing channel:** establishing a whistleblowing mechanism available for both internal and external parties to report and address unethical behaviour or violations of law and corporate governance rules and procedures.
- **Transparency:** maintaining transparency through the publication of annual ESG performance reports aligned with international frameworks like CSRD, ESRS and GRI.
- **Corporate policies and procedures:** maintaining a set of corporate policies (sustainability, corporate governance & compliance and risks) and procedures (Code of Conduct, Suppliers Code of Conduct) that are socialised across the organisation.

## 8. Stakeholder Engagement

The Group will actively engage its key stakeholders, including employees, clients, suppliers, investors, and local communities, through:

- **Surveys and feedback:** Regular surveys and feedback mechanisms to understand stakeholder needs and expectations, e.g. through client satisfaction surveys, employee surveys.
- **Transparent communication:** communicating the Group's sustainability initiatives and progress in a clear and accessible manner.
- **Strategic collaboration:** collaborative efforts to address common sustainability challenges and create long-term value for all parties involved.

## 9. Performance Monitoring and Reporting

Amara NZero will implement a robust system to monitor and report ESG performance by:

- **KPI tracking:** Tracking key performance indicators (KPIs) quarterly for environmental, social, and governance priorities.
- **Reports publishing:** Aligned with international standards such as CSRD, ESRS, and GRI to ensure transparency and comparability of information.
- **External verification:** Verifying ESG data through third-party audits to ensure accuracy and reliability.

## 10. Continuous Improvement

Amara NZero will foster a culture of continuous improvement by:

- **Regularly reviewing and updating** the Sustainability Policy to reflect evolving best practices and stakeholder expectations.
- **Encouraging innovation in sustainability** practices, including adopting new technologies to enhance environmental performance.
- **Utilizing feedback from stakeholders and industry benchmarks** to identify opportunities for growth and development.

This Policy has been approved by the Board of Directors of Green Bidco, S.A.U., parent company of Amara NZero Group, on 24 April 2025.