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Policy Objectives and Introduction to Guiding Principles

ContourGlobal, a KKR company, is an established Independent Power Producer (IPP) focused on developing, acquiring, and operating electricity generation and storage assets across Europe, North and South America, with a presence in Africa and Asia. The company currently manages 5.5 GW of installed capacity across multiple technologies and asset classes, with an additional 800 MW of renewables under construction and nearly 12.6 GW under development.

ContourGlobal is accelerating the decarbonization of its portfolio and evolving into a predominantly renewable IPP, supported by long-term contracts and innovative PPAs coupled with energy management solutions that deliver value beyond market standards.

As a symbol of its ongoing transformation and growth, the company refreshed this Policy on Social Responsibility and Environmental Sustainability embracing The Right Power Forward as its guiding purpose.

We are living an era in which energy technologies are guiding industrial transitions as well as social and cultural transformations. We need to progress decarbonization of the power sector, in electrifying our societies and in providing new emerging sectors with the clean and reliable power they need. Climate change, geopolitical uncertainties and infrastructure bottlenecks place clean energy transition at a crucial point. That's why we need....



THE RIGHT POWER FORWARD

Building reliable partnerships, with customers, developers and communities. **Creating shared value responsibly** in the
countries where
we operate.

Doing clean power right, with cost-effective electricity generationand storage technologies.



Our Vision

Our vision is a world in balance, where clean power is the natural choice for all, **producing lasting positive impact** for generations to come.

Our Mission

Our mission is to be a globally recognized producer of renewable energy, delivering affordable, reliable and sustainable electricity, being a trusted partner on the share deffort towards a low-carbon economy.



Our Values

- «We» is our greatest asset.
- We respect and protect the environment.
- We are doers, committed to doing things right.

- We act with integrity and transparency.
 - We think and act like entrepreneurs.

ContourGlobal



We embrace fair hiring, employee rights, training, development and retention and a positive corporate culture.

■ CSP PLANT IN SPAIR

At ContourGlobal, we believe in increasing our production of clean power to meet the growing electricity demand from existing and new sectors. Whether generating cost-effective energy in new markets, providing reliable energy in high-growth, or innovating in developed markets, we have the knowledge, capabilities, and resources to develop, build, own and operate businesses that improve the quality of life for clients, partners, and communities.

ContourGlobal's focus on social and environmental sustainability is a critical component of how we select, design, implement and transition our projects and operations. ContourGlobal has therefore developed and updated this Policy to ensure that our projects are developed in a socially responsible manner and reflect sound environmental management practices. In everything we do, ContourGlobal is committed to avoiding adverse impacts on workers, communities, and the environment, or if avoidance is not possible, to reducing, mitigating, or compensating for the impacts, as appropriate. We believe that adoption of, and adherence to, this Policy offers significant benefits to our clients, our partners and the communities where we work.

ContourGlobal's Policy reflects its responsibility as a signatory of commitment to, and membership in, the UN Global Compact and our All ContourGlobal projects and operations are required to implement this policy, All ContourGlobal projects and operations are required to adhere to this Policy, resulting in improved identification and management of social and environmental risks and enhancing positive development outcomes. Consultation and engagement with local communities about matters that directly affect them plays an important role in avoiding or reducing harm to people and the environment.

This Policy also underpins our Green Bond Framework, launch in 2025, which provides a detailed overview of our sustainability-linked business strategy and approach to growth and operations. ContourGlobal's Policy on Social Responsibility and Environmental Sustainability is a key governance document which should be considered in consultation with other key governance and compliance documents, including but not limited to the following:

- Green Bond Framework
- Social Investment Project Policy
- Code of Conduct and Business Ethics
- Supplier Code of Conduct,
- UNGC Principles Guide for Suppliers, and
- Human Rights Policy.



Pollution Prevention and Abatement

In the markets where we are active, it is ContourGlobal's aim to maintain or substantially improve the environmental profile (including CO_2 emissions) of the local country's energy use. Where possible, we aim to increase reliability and efficiency, use local resources and/or utilize innovative clean technologies and use existing technologies in innovative ways with a focus on pollution prevention or abatement.

We strive to integrate pollution prevention and control technologies and practices as far as their use is technically and financially feasible and cost-effective. We seek to avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities and promoting the reduction of emissions that contribute to climate change.

The project-specific pollution prevention and control techniques applied during the project life-cycle are tailored to the hazards and risks associated with project emissions and consistent



ContourGlobal seeks to avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.

BESS PLANT IN CHILE

with good international industry practice. We manage pollutants in accordance with regulatory requirements. In addition, we examine and incorporate in our operations resource conservation and energy efficiency measures, consistent with the principles of cleaner production.

We have established pro-active monitoring and emergency response procedures in a manner appropriate to the environmental aspects and operational risks. We have established training programs and resources, with clarity around roles, responsibilities, communication, procedures, and other aspects as outlined in both the corporate-led integrated management system as well as site-level management system processes.

Our commitment to
Health and Safety is
our highest priority.
We have adopted a
Target Zero program
focused on zero
harm, zero injuries.



Community Health, Safety and Security

While project activities, equipment, and infrastructure often bring benefits to communities including employment, services, and opportunities for economic development, projects can also increase the potential for risks and impacts arising from equipment accidents, structural failures, and releases of hazardous materials. Communities and workers may also be affected by impacts on their natural resources and exposure to diseases.

While recognizing that public authorities play a primary role in ensuring the health, safety and security of the public, ContourGlobal acknowledges its shared responsibility to prevent or minimize risks to and impacts on the health and safety of the local community throughout the project life cycle from both routine and non-routine circumstances.

The core value in our operations, "Target Zero," demands that we cause no harm to people or the environment. We are fully dedicated to providing and maintaining a safe and healthy workplace for our employees, contractors, and visitors, as well as to caring for the ecosystem and natural resources.

Our industrial approach, aimed at accelerating the transition to low-carbon generation and ensuring faster deployment of renewable energy, prioritizes the environment, not only by preventing the worsening of global climate change, but also by protecting the integrity of the biosphere in the regions where we operate.

Excerpt from Health, Safety and Environment Policy.

ContourGlobal evaluates the risks and impacts to the health and safety of the affected community throughout the project lifecycle and has implemented preventive and control measures that are proportionate to the identified risks and impacts. The organization and its units have plans and preparation for an effective and standard response to emergency situations, trying to minimize the impacts on people, community, environment and facilities.

ContourGlobal is committed to designing, constructing and operating the structural elements or components of a project in accordance with good international industry practice, paying particular consideration to potential exposure to natural hazards, especially where the structural elements are accessible to the affected community or where their failure could endanger community members. Where there is a potential for the community (including workers and their families) to be exposed to hazards, we exercise special care to identify risks, and avoid or minimize their exposure by modifying, substituting or eliminating the sources of risk. This includes exercising commercially reasonable efforts to control the safe deliveries of raw materials, transportation and waste disposal, and implementing measures to prevent or control community exposure to any hazardous substances that could affect human health.

We avoid or minimize the exacerbation of impacts caused by natural hazards, such as landslides or floods, that may result from project-related land use changes. We also take proactive measures to avoid or minimize adverse impacts on soil, water, and other natural resources used by the affected communities.

We assess any potential risks and impacts from project activities and communicate information to affected communities about significant potential hazards in a culturally appropriate and accessible manner. We also assist and collaborate with the community and the local government agencies to strengthen their emergency preparedness and response capabilities, especially where their participation and collaboration are essential. If local government agencies lack sufficient capacity to respond effectively to emergencies, we will take an active role in supporting emergency planning and response associated with the project. We will document emergency preparedness and response activities, resources, and responsibilities, and transparently disclose relevant information to affected communities and government agencies.



HEALTH, SAFETY AND ENVIRONMENT (HSE) POLICY

AT CONTOURGLOBAL, OUR GREATEST ASSET IS PEOPLE.

We believe that life is the most precious value and it must be protected at all times, whether at work, home, or during leisure. To preserve and nurture it, we need safety, well-being, and health, along with a balanced relationship with the ecosystem in which we live.

The core value at the heart of our strategy is "Target Zero", a mandate to causing no harm to people or the planet, and to preventing all HSE incidents.

Our industrial approach prioritizes environmental protection by accelerating the transition to low-carbon generation and ensuring the rapid development of renewable power, helping to prevent the worsening of global climate change. HSE excellence is crucial to achieving all our objectives, and that's why every member of our company is expected to behave as an ambassador of this policy.

OUR COMMITMENTS

NO SHORTCUTS ON SAFETY AND ENVIRONMENTAL CARE

Our objective of "Target Zero" takes precedence over operational and economic objectives. Anyone has the right and duty to Stop Work, and Stop others from Working, if they identify unsafe behaviors or conditions that can cause harm to people and the environment.

EMPLOYEE HEALTH AND POSITIVE WORK CULTURE

We prioritize the physical and mental health and well-being of our employees and contractors, fostering a positive work culture that supports flexible work models, diversity, and multiculturalism.

HAZARD ELIMINATION AND RISK REDUCTION

We strive to eliminate hazards and reduce HSE risks by applying the hierarchy of controls as far as is reasonably practicable and prioritizing intrinsic safety in our workplaces.

LEGAL AND REGULATORY COMPLIANCE

We comply with all applicable legal and regulatory requirements in every country within which we operate. Equally, we demand and ensure compliance from all our suppliers and partners.

STAKEHOLDER ENGAGEMENT

We build relationships through timely, transparent communication and engagement with our stakeholders including employees, customers, contractors, regulatory authorities, communities, visitors, and other interested parties.

COLLABORATION AND INNOVATION

We collaborate with contractors, customers, and stakeholders to advance towards "Target Zero," to mitigate impacts, and to enhance efficiencies throughout the value chain. We benchmark against world-class peers and adopt best practices, including innovation and technological developments.

CONTINUOUS IMPROVEMENT

We continuously review and improve our activities and operations. We thoroughly analyse incidents and near misses, sharing lessons learned internally and with industry peers. Our HSE management systems are aligned with ISO 45001 and ISO 14001 standards and we commit to continuous improvement through periodic critical reviews by the Executive Committee.

Antonio Cammisecra, President and Chief Executive Officer ContourGlobal

June 12th, 2024

ContourGlobal Limited - Registered Office: Tintagel House, 92 Albert Embankment, London, United Kingdom, SE1 7TY - Registered in England & Wales - Company Number 10982736



Land Acquisition and Involuntary Resettlement

ContourGlobal is committed to avoiding or, where not possible, minimizing potential impacts associated with acquisition of developments which may result in involuntary resettlement.

Involuntary resettlement refers both to physical displacement and to economic displacement as a result of project-related land acquisition.

Resettlement is considered involuntary when affected individuals or communities do not have the right to refuse land acquisition that results in displacement.

This occurs in cases of:

- 1. lawful expropriation or restrictions on land use based on eminent domain and
- negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fail.

Unless properly managed, land acquisition or involuntary resettlement may result in long-term hardship and impoverishment for affected persons and communities, as well as environmental damage and social stress in areas to which they have been displaced.

For these reasons, Contour Global's policy is to avoid or minimize the impact of any involuntary resettlement. However,

where it is unavoidable, appropriate measures to mitigate adverse impacts on displaced persons and host communities will be carefully planned and implemented in accordance with ContourGlobal's Human Rights Policy, governmental guidelines and regulations as well as international Frameworks and Standards such as the World Bank Policy on Involuntary Resettlement, set out in Operational Policy 4.12, and IFC Performance Standard 5.

ContourGlobal seeks to avoid involuntary resettlement wherever possible

When displacement cannot be avoided, we will consult with and facilitate the informed participation of affected persons and communities, including host communities, in decision-making processes related to resettlement and establish a grievance mechanism to receive and address specific concerns about compensation and relocation that are raised by displaced persons or members of host communities, including a recourse mechanism designed to resolve disputes in an impartial manner.

Where land acquisition and resettlement are the responsibility of the host government, we will collaborate with the responsible government agency, to achieve outcomes that are consistent with the objectives of this Policy and International Standards.

- 1.lawful expropriation or restrictions on land use based on eminent domain and
- 2.negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fail. 3.Relocation or loss of shelter.
- Loss of assets or access to assets that leads to loss of income sources or means of livelihood.
- 5. Land acquisition includes both outright purchases of property and purchases of access rights, such as rights-of-way.
- 6. A host community is any community receiving displaced persons.



Biodiversity Conservation and Sustainable Natural Resource Management

ContourGlobal recognizes that protecting and conserving biodiversity—the variety of life in all its forms—is fundamental to sustainable development. We appreciate the important role that Nature-based solutions (NbS) play in protecting, restoring, and sustainably managing ecosystems to mitigate climate change-related impacts. We consider the contributions of traditional environmental knowledge in our understanding of the surrounding

conditions, risks and opportunities, as well as the importance of ecosystems services amongst our community members.

We strive to avoid or mitigate threats to biodiversity arising from our operations and to sustainably manage renewable natural resources to protect and conserve biodiversity and promote the sustainable management and use of natural resources through the adoption of practices that integrate conservation needs and development priorities.

In order to avoid or minimize adverse impacts to biodiversity in a project's area of influence, we assess the significance of project impacts as an integral part of the assessment process, including analyzing differing values attached to biodiversity by specific stakeholders, as well as identify impacts on ecosystems. This process focuses on the major threats to biodiversity, which include habitat destruction and invasive alien species.

We recognize habitat destruction as the major threat to the maintenance of biodiversity and our policy is to design mitigation measures so that our projects' impact to habitats will have no "net loss". To achieve this, we will consider a variety of mitigating measures, including:

- pre-development assessment and documentation of baseline conditions
- 2. post-operation restoration of habitats;
- offset of losses through the creation of ecologically comparable area(s) that is managed for biodiversity;
- 4. compensation to direct users of biodiversity.

In areas with critical habitats, 8 we will not implement any project activities unless:

- there are no measurable adverse impacts on the ability of the critical habitat to support the established population of species or the functions of the critical habitat;
- 2. there is no reduction in the population of any recognized critically endangered or endangered species;
- 3. any lesser impacts are mitigated in accordance with the mitigation.

In circumstances where a proposed project is located within a legally protected area, 9 we will further:

- act in a manner consistent with defined protected area management plans;
- consult protected area sponsors and managers, local communities, and other key stakeholders on the proposed project;
- implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area.

Intentional or accidental introduction of alien species of flora and fauna into areas where they are not normally found can be a significant threat to biodiversity, since some alien species can become invasive, spreading rapidly and out-competing native species. We do not deliberately introduce any alien species with a high risk of invasive behavior or any known invasive species, and

will exercise diligence to prevent accidental or unintended introductions. We will also take measures to protect the native flora and fauna of a region.

We believe in sustainable resource management, which means that we manage the use, development and protection of renewable natural resources in a way, or at a rate, which enables people and communities, including Indigenous Peoples (see also next section), to provide for their present social, economic and cultural well-being while also sustaining the potential of those resources to meet the reasonably foreseeable needs of future generations and safeguarding the life-supporting capacity of air, water and soil ecosystems.

Where possible, we employ an appropriate system of independent certification to document our sustainable management of resources.



Such a system will include objective and measurable principles developed through consultation with relevant stakeholders, such as local people and communities, indigenous peoples, civil society organizations representing consumer, producer, and conservation interests. Such a system has fair, transparent, and independent decision-making procedures that avoid or minimize conflicts of interest.

- 12. Critical habitat includes areas with high biodiversity value, including: (i) habitat required for the survival of critically endangered or endangered species; (ii) areas having special significance for endemic or restricted-range species; (iii) sites that are critical for the survival of migratory species; (iv) areas supporting globally significant concentrations or numbers of individuals of congregatory species; (v) areas with unique assemblages of species or which are associated with key evolutionary processes or provide key ecosystem services; (vi) areas having biodiversity of significant social, economic or cultural importance to local communities.
- An area may be designated as legally protected for different purposes, including the protection or conservation of biodiversity, including areas proposed by governments for such designation, e.g. Natura 2000.



Indigenous People

ContourGlobal recognizes The United Nations
Declaration on the Rights of Indigenous Peoples
(UNDRIP), adopted in 2007 and setting out the individual
and collective rights of Indigenous peoples worldwide.
We support the rights of Indigenous Peoples to selfdetermination, culture, land, and non-discrimination,
ensuring their survival, dignity, and well-being.

Contour Global respects the rights, interests, perspectives and aspirations of Indigenous Peoples and acknowledge their right to maintain their culture, identity, traditions and customs. We are committed to transparent communications and strive to create opportunities for Indigenous Peoples in our development and operational areas to participate in our projects and benefit from project-related activities that may help them fulfill their aspiration for economic and social development. We recognize that Indigenous Peoples may play a role in sustainable development by promoting and managing activities and enterprises as partners in development.

It is our policy to identify all communities, including indigenous peoples, who may be affected by the project within the project's area of influence, as well as the nature and degree of the expected social, cultural (including cultural heritage), and environmental impacts on these communities. We will

establish a consultation process from as early as possible in the project planning and throughout the life of the project. We will facilitate their informed participation on matters that affect them directly, such as proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. We will also seek to identify opportunities for culturally appropriate development benefits.

When Indigenous Peoples are particularly vulnerable to the special circumstances of a project, we will retain qualified and experienced external experts to assess impacts. Where there may be adverse impacts on the livelihoods, or cultural, ceremonial, or spiritual use of land used by indigenous peoples, we will consider feasible alternative project designs to avoid the relocation of indigenous peoples from their communally held traditional or customary lands under use.

14. The term "Indigenous Peoples" is used in a generic sense to refer to a distinct social and cultural group possessing the following characteristics in varying degrees: self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories; customary cultural, economic, social, or political institutions that are separate from those of the dominant society or culture; or an indigenous language, often different from the official language of the country or region.



Cultural Heritage

Cultural heritage refers to both tangible and intangible forms of cultural heritage. Tangible forms of cultural heritage may include property and sites having archaeological (prehistoric),

paleontological, historical, cultural, artistic, and spiritual value, as well as unique natural environmental features that embody cultural values, such as sacred groves. Intangible forms of culture might include cultural knowledge, traditional environmental knowledge, innovations and practices of communities embodying traditional lifestyles.

We respect human rights and seek to learn about the traditions, cultures, perspectives and development priorities of people with whom we engage and build trusting and constructive long-term relationships. Cultural heritage is important for both current and future generations and we are committed to protecting irreplaceable cultural heritage in the course of our business operations. In particular, we aim to protect cultural heritage from the adverse impacts of project activities and support its

preservation, and to promote the equitable sharing of benefits from the use of cultural heritage in business activities. We seek to protect and support cultural heritage by undertaking internationally recognized practices for the protection, field-based study, and documentation of cultural heritage, and working in partnership with community members to identify and consider cultural heritage aspects. This might include retention of qualified and experienced experts to assist in the assessment. Where a project may affect cultural heritage, we consult with affected communities within the host country who use, or have used within living memory, the cultural heritage for longstanding cultural purposes to identify cultural heritage of importance, and to incorporate into our decision-making process the views of the affected communities on such cultural heritage. Consultation also involves the relevant national or local regulatory agencies that are entrusted with the protection of cultural heritage. We do not significantly alter, damage, or remove any critical cultural heritage.11

^{15.} Critical cultural heritage consists of (i) the internationally recognized heritage of communities who use, or have used within living memory the cultural heritage for long-standing cultural purposes; and (ii) legally protected cultural heritage areas, including those proposed by host governments for such designation.



Implementation of the Social and Environmental Policy

ASSESSMENT

ContourGlobal has established a series of social and environmental assessment processes, commencing during the project evaluation phase, and continuing through the review and approval by the Investment / Green Finance Committee. These environmental and social assessment processes (herein referred to as "the assessment") identifies the relevant social and environmental impacts and risks of the proposed project as well as possible mitigation and management measures. The nature and scale of the proposed project is considered and the assessment is an accurate and objective evaluation and presentation of the issues prepared by qualified and experienced subject matter experts. The assessment is informed by relevant national and international norms and regulations, such as the International Finance Corporation Performance Standards, the EU Taxonomy alignment principles of Do No Significant Harm and Minimum Social Safeguards, and in alignment with our commitments as signatories of the United Nations Global Compact.

The assessment process includes three phases: the initial review at the midpoint of the project evaluation process ("50% likelihood") of a project, a detailed review prior to submission to the Investment / Green Finance Committee, and as part of the project transfer process during hand-over.

The initial review, an integral factor in progressing the project's feasibility, includes a preliminary assessment of social and environmental risks and impacts and considers a review of available historical social or environmental studies, reports and other documentation Once a project's feasibility is ascertained and approved by management, we will conduct a more in-depth social and environmental review, either internally or by external experts prior to submission to the Investment / Green Finance Committee. The detailed review will consider the potential social and environmental (including labor, health, and safety) risks and impacts of the project in an integrated manner. The detailed review is based on current information, including an accurate project description, and appropriate social and environmental baseline data and considers all relevant social and environmental risks and impacts of the project. Applicable laws and regulations of the jurisdictions in which the project operates that pertain to social and environmental matters, including those laws implementing host country obligations under international law, will also be considered. In the detailed review, we will analyze risks and impacts of the project in the context of the project's direct and indirect areas of influence. This area of influence encompasses, as appropriate:

- 1. the primary project site(s) and related facilities that Contour-Global (including our contractors) develops or controls;
- associated facilities that are not funded as part of the project (funding may be provided separately by us or by third parties including the government), and whose viability and existence depend exclusively on the project and whose goods or services are essential for the successful operation of the project;
- areas potentially impacted by cumulative impacts from further planned development of the project, any existing project or condition, and other project-related developments that are realistically defined at the time the detailed review is undertaken; and
- areas potentially affected by impacts from unplanned but predictable developments caused by the project that may occur later or at a different location.

The area of influence does not include potential impacts that would occur without the project or independently of the project.

We will analyze risks and impacts for all key stages of the project life cycle, including preconstruction, construction, operations, and decommissioning or closure. Where relevant, the detailed review will also consider the role and capacity of third parties (such as local and national governments, contractors and suppliers), to the extent that they pose a risk to the project, recognizing that we should address these risks and impacts commensurate to our control and influence over the third-party actions. The potential impacts associated with supply chains are considered in compliance with ContourGlobal's Supplier Code of Conduct, and associated systems and processes, with a focus on social risks, including Human Rights, and environmental protection. The detailed review will also consider potential transboundary effects, such as pollution of air, or use or pollution of international waterways, as well as global impacts, such as climate change risks and the emission of greenhouse gases.

In an acquisition, our due diligence includes careful analysis of social and environmental risks and opportunities. We review the operating history of a business to ensure it has been compliant and identify new opportunities during the diligence process.

Operating across every continent, our business embraces a geographically diverse and inclusive approach, deeply rooted in understanding the unique contexts of the local communities we serve. Depending on the type of project and the nature and magnitude of its risks and impacts, the types of issues, risks and impacts to be assessed, and the scope of the community engagement can vary considerably. Where projects might have potential significant adverse impacts that are diverse, irreversible, or unprecedented, we will undertake a comprehensive social and environmental impact assessment. This assessment will include an examination of technically and financially feasible alternatives¹² to the source of such impacts, and documentation of the rationale for selecting the particular course of action proposed. In exceptional circumstances, a regional, sectoral or strategic assessment may be required.

We prioritize building strong relationships by identifying and engaging with individuals, groups, and organizations who have a stake in or are impacted by our operations. Our engagement activities are designed to be relevant and appropriate for a wide range of stakeholders, including vulnerable groups. We actively consult and incorporate the views of interested and affected parties in decision-making processes that may affect them. Beyond direct community engagement, we participate in multistakeholder initiatives at local, national, and international levels, addressing issues of societal importance.

It is our policy to disclose relevant project information and information identified where such disclosure might help affected communities understand the risks, impacts and opportunities of the project. For projects with potential adverse social or environmental impacts, mitigation plans will be developed, and disclosure will occur before the project construction commences, and on an ongoing basis.

16. Technical feasibility" is based on whether the proposed measures and actions can be implemented with commercially available skills, equipment and materials, taking into consideration prevailing local factors such as climate, geography, demography, infrastructure, security, governance, capacity and operational reliability. "Financial feasibility" is based on commercial considerations, including the relative magnitude of the incremental cost of adopting such measures and actions compared to the project's investment, operating and maintenance costs and whether this

incremental cost could make the project nonviable to the client



MANAGEMENT PROGRAM

Once we have properly completed the Social and Environmental Assessment, we establish and manage a program of mitigation, monitoring, and performance improvement measures and actions (the "Management Program") aligned with the principles of Adaptive Management. The level of detail and complexity of the Management Program, which is transferred as part of the project handover process, and the priority of the identified measures and actions, are commensurate with the project's risks and impacts. The Management Program defines desired outcomes as measurable events to the extent possible, with elements such as performance indicators, targets, or acceptance criteria that can be tracked over defined time periods, and with estimates of the resources and responsibilities for implementation.

Recognizing the dynamic nature of the project development and implementation process,

the Management Program will be responsive to changes in project circumstances, unforeseen events, and the results of monitoring.

ACTION PLAN Where the Management Programs identifies specific monitoring and/or mitigation measures and actions necessary for the project to comply with applicable laws and regulations and to meet the requirements of the policy, we will prepare a plan (the "Action Plan") to ensure the measures and actions required will be successfully implemented.

The Action Plan may range from a brief description of routine mitigation measures to a series of specific plans. The Action Plan:

- 1. describes the actions necessary to implement the various sets of mitigation measures or corrective actions to be undertaken;
- 2. prioritizes these actions;
- 3. includes the timeline for their implementation;
- 4. is disclosed to the affected communities; and
- 5. describes the schedule and mechanism for external reporting on our implementation of the Action Plan.

organizational capacity it is our policy to establish and maintain an organizational structure that defines roles, responsibilities, and authority to complete the required assessment processes, and to subsequently implement the Management Program, including the Action Plan. Specific personnel, including management representative(s), with clear lines of responsibility, exprience and authority are designated and key social and environmental responsibilities are well-defined and communicated to the relevant personnel and to the

rest of the organization. Sufficient management sponsorship and human and financial resources are provided on an ongoing basis to achieve effective and continuous social and environmental performance.

TRAINING ContourGlobal trains employees and contractors with direct responsibility for activities relevant to a project's social and environmental performance so that they have the knowledge and skills necessary to perform their work, including relevant ContourGlobal policies and procedures. Further employees and contractors are required to adhere to the host country's regulatory requirements and the applicable requirements of the Policy. Training also addresses the specific measures and actions required under the Management Program, including the Action Plan, and the methods required to perform the action items in a competent and efficient manner.

COMMUNITY ENGAGEMENT Effective community engagement is central to the successful management of risks and impacts to the affected communities.

We engage with affected communities through disclosure of information via the Management Plan processes, including consultation, and informed participation, in a manner commensurate with the risks to and impacts on the affected communities. Through transparent engagement, ContourGlobal aims to build and maintain over time a constructive relationship with our communities. We are committed to ensuring that all community engagement will be free of external manipulation, interference, or coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information. We will document our community engagement efforts to ensure informed participation of the community.

We are committed to the principles of Creating Shared Value¹² in the identification and implementation of social investment projects across our host locations, to contribute to long-term positive impacts and resilient communities.

Creating Shared Value, Michael E. Porter and Mark R. Kramer, Harvard Business Review, February 2011

Where communities may be subject to risks or adverse impacts from a project, we will undertake a process of consultation in a manner that provides the potentially affected communities with opportunities to express their views on project risks, impacts, and mitigation measures, and allows us to consider and respond to them.

Effective consultation:

- should be based on the prior disclosure of relevant and adequate information, including draft documents and plans;
- 2. should begin early in the assessment process;
- focuses on the social and environmental risks and adverse impacts, and the proposed measures and actions to address these; and
- 4. is carried out on an ongoing basis as risks and impacts arise.

The consultation process is undertaken in a manner that is inclusive and culturally appropriate. We will tailor the consultation process to the language preferences of the affected communities, their decision- making process, and the needs of disadvantaged or vulnerable groups.

Community engagement leads to more equitable, transparent, and effective outcomes

For projects with potential adverse impacts on affected communities, ContourGlobal will ensure

- that the consultation process is free of external manipulation, interference or coercion, and intimidation;
- 2. that information is disclosed to participants in a timely manner; and
- 3. that information is relevant, understandable and accessible.

We will also strive for informed participation that involves organized and iterative consultation, leading to the incorporation into our decision-making process the views of the affected communities on matters that affect them directly, such as proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. We will document the process, in particular, the measures taken to avoid or minimize risks to and adverse impacts on the affected communities.

We encourage and welcome feedback and implement processes for communities to raise concerns and complaints. We record and investigate all concerns and complaints and seek to resolve them in a timely manner. Opportunities for feedback:

- 1. will be scaled to the risks and adverse impacts of the project;
- will address concerns promptly, using an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected communities, and at no cost and without retribution; and
- 3. will not impede access to judicial or administrative remedies.

MONITORING ContourGlobal's establishes clearly defined procedures to monitor and measure the effectiveness of the Management Program, including the implementation of the Action Plan. In addition to recording information to track performance and establishing relevant operational controls, we use dynamic mechanisms, such as inspections and audits, where relevant, to verify compliance and progress toward the desired outcomes. For projects with potential adverse impacts that are diverse, irreversible, or unprecedented, we retain qualified and experienced external experts to verify our monitoring information. The extent of monitoring should be commensurate with the project's risks and impacts and with the project's compliance requirements. Monitoring should be adjusted according to performance experience and feedback. We will document monitoring results, and identify and reflect the necessary corrective and preventive actions in amendments to the Management Program.

We will implement these corrective and preventive actions, and follow up on these actions to ensure their effectiveness.

In alignment with our Green Bond Framework (2025), we continuously monitor our investments by:

- annually developing a Green Bond Impact and Allocation report, documenting the financial allocations and selected environmental KPIs;
- routinely reviewing projects and reviewing any performance improvement opportunities;
- working to address any changed project circumstances that would result in adverse social or environmental impacts;
- submitting an Annual UNGC Communication on Progress reporting publicly on our social, environmental and other nonfinancial aspects of performance.



Summary

ContourGlobal is committed to promoting responsible environmental stewardship and socially responsible development. Our policy reflects our commitment to the United Nations Global Compact and to apply best practices in the areas of:

- 1. pollution prevention and abatement;
- 2. community health, safety and security;
- 3. land acquisition and involuntary resettlement;
- 4. biodiversity conservation and sustainable natural resource management; and
- 5. indigenous people and cultural heritage.

To ensure we meet or exceed all standards set forth in our Policy, we do not partner on projects with third parties where such party is not willing or is unable to comply with our social and environmental policies and procedures that implement these Principles. We seek business partners who share our vision and commitment to sustainable development, who wish to raise their capacity to manage their social and environmental risks, and who seek to improve their performance in this area. We actively manage our social and environmental risks to improve performance and enhance positive development outcomes while ensuring the costs of economic development do not fall disproportionately on the poor or vulnerable, the environment is not degraded, natural resources are managed efficiently and sustainably, and human rights are respected. We communicate transparently with the communities where we do business and with our stakeholders. It is our mission to be socially responsible and increase the sustainability of our business.

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