



Edisun Power Europe Ltd.

**SUSTAINABILITY
REPORT**

2024

Key figures

Total Solar Production

160 568 MWh

2023: 165 094 MWh | – 2.7 %

Total CO₂ Reduction

57 208 tons

2023: 58 834 tons | – 2.7 %

Total Coal Savings

76 790 tons

2023: 78 955 tons | – 2.7 %

	2024	2023
Serious Accidents	0	0
Significant compliance incidents	0	0

We contribute to the UN Sustainable Developments Goals



Committed to Sustainable Business

Dear Investor,

For more than a quarter of a century, Edisun Power has been at the forefront of sustainability, establishing itself as Europe's first publicly listed solar power producer. Now in its third decade, the company remains dedicated in its commitment to climate protection.

Sustainability is the driving force behind all our actions, extending far beyond decarbonization. It means taking responsibility—for our employees, society, and the environment—while carefully balancing social, ecological, and economic considerations.

The urgency for sustainable management has never been greater. Recent extreme weather events, such as DANA in Spain, widespread flooding, and rising temperatures across Europe, underscore the growing impact of climate change.

At the same time, global electricity demand continues to rise, driven by the increasing adoption of artificial intelligence applications—from facial recognition on mobile devices to advanced translation tools like DeepL and intelligent assistants such as ChatGPT, DeepSeek, Claude, Grok, Gemini, Perplexity or Mistral. These innovations require vast amounts of energy, intensifying the challenge of balancing environmental sustainability with energy security and economic efficiency—our daily motivator anew.

This sustainability report—our first stand-alone publication—is for Edisun a voluntary initiative and not subject to any regulatory requirements. It highlights our long-term commitment to sustainability, demonstrating the concrete steps we take to integrate responsible practices into our business model.

Guided by the three pillars of sustainability—environmental responsibility, social impact, and corporate governance—we are tackling today's challenges while shaping a more sustainable and livable future.

I want to express my sincere gratitude to our partners, investors and all stakeholders for your unwavering collaboration, support, and trust. Together, we are continuing paving the path toward a sustainable future.



A handwritten signature in blue ink that reads "R. Cotting".

Dr. René Cotting
CFO (mandated) and Head Investor Relations
Edisun Power Europe Ltd.

Sustainability Report 2024

Guided by a vision of a sustainable future, Edisun has been driving the energy transition since 1997. This commitment is deeply embedded in our approach, focusing on creating long-term sustainable value while recognizing our impact on people and the environment. As part of this responsibility, we are dedicated to continuously enhancing our sustainability practices. We consider the measures outlined in this report to be an important milestone in our ESG strategy.



34 solar plants in Europe with the number of plants per country.

1. General information

The scope of this report covers the organizational structure as highlighted in Edisun Power's annual report. Unless specified otherwise, all information and figures relate to the entire Edisun Power Group and the period of January, 1 to December 31, 2024. Where relevant, the upstream and /or downstream value chain is addressed in the appropriate sections.

Edisun Power has been active in the field of solar production since 1997 and is one of the most successful companies in the Swiss solar energy sector. Since September 2008, Edisun Power Europe Ltd. has been listed at the SIX Swiss Exchange. The company is headquartered in Zurich and operates 34 solar plants with a total capacity of 106 megawatts in six countries: Switzerland, Germany, France, Italy, Portugal and Spain.

Edisun Power focuses on the sale of solar energy and respective guarantees of origin. Some additional revenues are derived from the operational management of photovoltaic systems for external customers as well as rental income on land owned by its subsidiaries. The company is striving for further growth with the development of a large portfolio of almost 1 GWp.

Until 2023, Edisun Power had focused on small and mid-scale solar plants. Since then, Edisun Power shifted its focus and future investments to large-scale solar plants through the acquisition of the "Fuencarral" project with a total capacity of 941 MWp, composed of three large-scale solar projects strategically located in the greater Madrid area in Spain.

The "Fuencarral" solar project consists of the following three solar plants: Fuencarral (291 MWp), Pradillos (390 MWp) and Loeches (260 MWp). It disposes of the very important grid access, granted connection rights, environmental permit (DIA), administrative permit (AAP) and the official construction permit (AAC).

At year-end of 2024, the board of directors decided further not only to harness the solar power generated by connecting it to the power grid, but also to seize the business opportunity to offer renewable energy to data centers. This comprises measures to secure the grid connection for additional energy purchase, in addition to the already approved feed-in grid connection, as well as securing land rights for datacenters. This should increase the project's profitability.

ESG strategy

Edisun Power aims to create sustainable value for its stakeholders, demonstrating its commitment and performance in sustainability. Operating in six countries, the company follows a growth strategy in the energy market. Integrating environmental, social, and corporate governance considerations is a core element of this strategy. Edisun Power highlights the strong connection between its corporate strategy, business model, and sustainability objectives.

ESG reporting strategy and governance framework

Edisun Power is closely monitoring new regulations coming into force at Swiss and European level. Whilst Edisun Power is not subject to reporting obligations under the Swiss regulation (Art. 964a of the Swiss Code of Obligations) nor the EU’s Corporate Sustainability Reporting Directive (CSRD), it has proactively aligned to the new CSRD directive voluntarily.

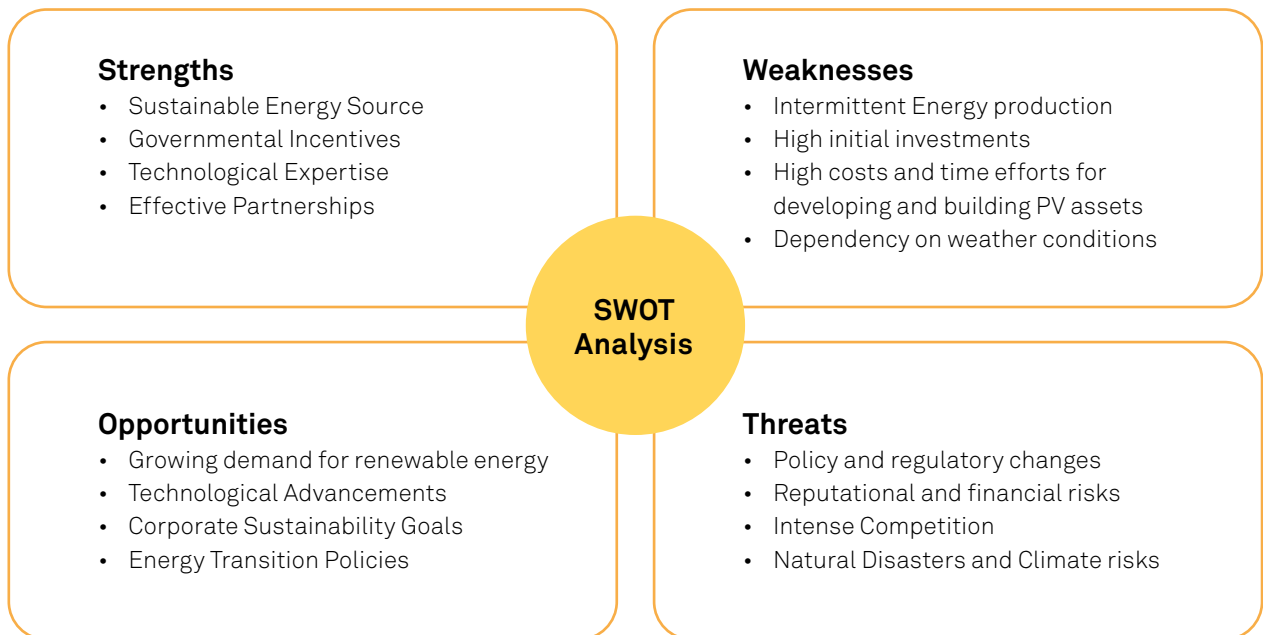
Edisun follows the European Sustainability Reporting Standards (ESRS) framework to report on environmental, social and governance (ESG) topics and to generally define its ESG strategy, as evidenced through this section of its annual Sustainability Report.

Following its assessment in 2023 of existing ESG initiatives, coupled with a comprehensive benchmark analysis of industry peers, Edisun has conducted in 2024 a double materiality assessment according to the CSRD requirements. The aim of this assessment has been to identify and prioritize key ESG issues relevant to our business which have the most impact on our operations and value chain. The outcome of this assessment is described below in more detail and will form the basis of annual reviews and improvements.

Risk Management

Edisun Power integrates sustainability-related risks and opportunities in its strategic planning. As a European solar producer with a regional base operating in a very dynamic environment, these changes represent both opportunities and risks, which is why we are constantly monitoring them.

During 2024, the analysis of our strengths, weaknesses, opportunities and threats (SWOT) was carried out with the following results:



This analysis has provided valuable input for the double materiality assessment and continues to support Edisun's business model.

In addition to financial, regulatory and technical innovations, Edisun Power additionally monitors social, environmental and climate-related developments.

In the risk assessment we carried out in 2024 we classified the risks in:

- Financial Risk
- Compliance Risk
- Operational Risk
- Strategic Risk and
- Sustainability Risk

The most significant risks we identified are:

1. Delay or failure to obtain building permits
2. Decrease in energy prices
3. Damage to the brand or corporate reputation
4. Risks of exceptional events and
5. Financing and interest rate risks

Measures to mitigate the most significant risks

In order to operate the PV assets, the company is dependent on various **government permits**, which vary from country to country. It is possible **that permits are withdrawn or delayed** for various reasons, and this has a negative effect on business operations.

In our project controlling we observe the milestones during developing our PV assets and discover early if we are on track or not and can ask regularly at the permitting authorities where we are standing.

Changes in geopolitical situations or pandemics can have a major impact on business activities, as energy prices react to such changes in a highly volatile manner. The **prices for energy from renewable energy sources** depend in part on the price development of non-renewable energies. Falling pricing of these can lead to reduced attractiveness of renewable energies, which can have a negative impact on the company's business operations. The profitability level is contingent on the environment of the electricity market, particularly on the market prices for electricity energy or the sales contracts (power purchase agreements) that Edisun Power concludes with third parties. Due to the high production of renewable energy on sunny days, the prices for electrical energy can be significantly lower than today's market prices and/or the market prices estimated in the project calcu-

lations. This can also be the case in the long term if there is an oversupply of renewable energy.

Changes in energy prices can affect the company's earnings and have a strong positive or negative impact. A decrease in energy prices we can mitigate by concluding long-term fixed PPA's.

A weak operational performance and/or capital structure, as well the (resulting) publication of negative press on Edisun Power (not related to lawsuits or compliance issues) **can negatively affect its reputation** and therefore reduce its possibility to raise equity, debt and/or refinance its debt. As a sign of Edisun's commitment to sustainability, and therefore to the transparency of information, Edisun has voluntarily accepted compliance with the regulatory framework to report information on sustainability according to CSRD, as evidenced in this report.

To mitigate the risks associated with **exceptional events** (such as climate catastrophes, health alerts, atmospheric events, etc.), integrated emergency plans are implemented in our solar plants in order to avoid possible climate disasters. The established measures of these plans come from the risk assessments that have previously been carried out both in the development and construction phases, considering construction criteria for the plants in places with a lower probability of these risks materializing.

To mitigate the financing and the **interest rate risks** leading to financing costs getting higher and higher we are regularly launching bonds with a duration of five years with a fixed interest rate.

DOUBLE MATERIALITY

This is the initial exercise incorporating the requirements of the European Sustainability Reporting Standards (ESRS). Reporting under ESRS marks a significant improvement for Edisun, building on our commitment made last year to enhance and guide our ESG disclosures.

The structure adopted follows the order defined in ESRS 1- General principles, while organizing the content into four parts: 1) General; 2) Environmental; 3) Social; and 4) Governance Information.

Given that Edisun is not subject to formal ESG obligations, the content of each sub-chapter has followed a more flexible rationale than that defined by ESRS. This sustainability report also follows that structure and, in each of the sections, focuses on the most relevant ESG matters identified in the double materiality assessment.

Value Chain

Edisun oversees every stage of an energy facility's life cycle. The development process begins with exploration and permitting, followed by financing and procurement. Once these steps are completed, construction can commence. After the facility starts production, it enters into a long operational phase. When the facility nears the end of its lifetime, decisions are made regarding the reuse or recycling of materials. Throughout all phases, projects may be bought or sold. To execute its business strategy and achieve its objectives, Edisun relies on strong partnerships. The company collaborates with various partners for solar plant development, product supply, construction, and financing, each bringing specialized expertise to the process.

The concept of the value chain used in ESRS includes the full range of interactions, resources and relationships related to a reporting entity's business model and external environment in which it operates. When assessing which impacts, risks and opportunities are considered material, Edisun included the analysis of the value chain.

Stakeholders

The success of our strategy is deeply rooted in our collaboration with all stakeholders. In line with the ESRS, stakeholders are categorized into two main groups: affected stakeholders and users of sustainability statements.

Through continuous dialogue with our stakeholders, we gain valuable insights into their expectations of Edisun, the issues that matter most to them, the impact of our activities, and opportunities for collaborative solutions.

In its Double Materiality Assessment, Edisun identified the following relevant stakeholders:

- Owners (shareholders)
- Investors, financial entities
- Local communities
- Regulators (Municipalities, regions)
- Subcontractors
- Customers
- External consultants
- Business community
- Public administrations
- Industry (Industry and lobby organizations, competitors, media, advisors)

Methodology

The methodology applied was based on the guidelines provided by the European Financial Reporting Advisory Group (EFRAG). It encompassed two distinct analyses: one assessing the external impacts of Edisun's activities (inside out perspective—impact materiality) and the other evaluating the risks and opportunities arising from the external environment that influence, or may influence, Edisun's value creation (outside in perspective—financial materiality).

The starting point for this exercise was to understand the context of impacts, considering the company's activities, business relationships, and stakeholders. A benchmarking analysis was conducted, with its results contributing to the final double materiality assessment.

Throughout the process, impacts, risks, and opportunities were identified through the risk assessment and the SWOT analysis. These were then evaluated using a specific methodology to determine their relevance/significance.

ESG at Edisun

Our Double Materiality process

1 Identification of Contextual Information



- Review and evaluation of internal and external information, along with benchmarking analysis

2 Double Materiality Assessment



- **Financial Materiality**—Identification and assessment of risks and opportunities that different sustainability topics can generate for the company's ability to generate value
- **Materiality Impact**—Identification and assessment of impacts of Edisun's activities on different sustainability issues

3 Analysis and prioritisation of findings



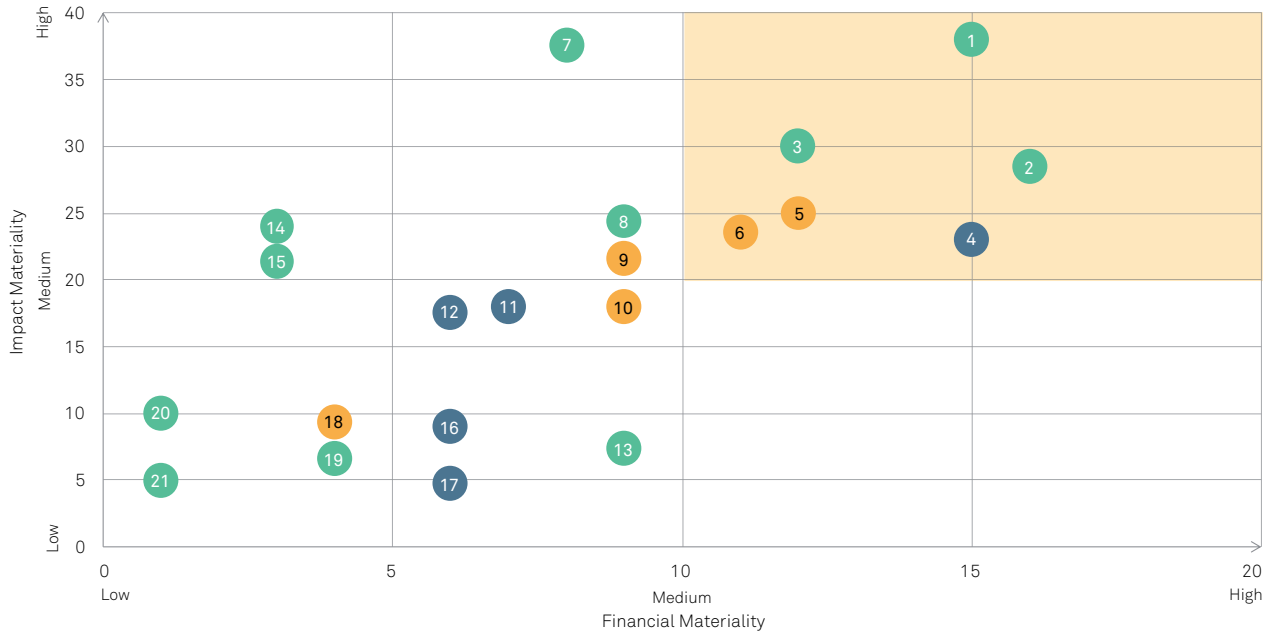
- Joint analysis and reflection by the sustainability core team to set priority topics

4 Validation by the Executive Board



- Analysis by the Executive Board of the level of strategic priority and relevance of certain issues presented in the preliminary list of topics
- Definition of the material topics and the ESG strategy

The results of these two analyses (impact materiality and financial materiality) were cross-referenced in a matrix, leading to the following list of priority topics.



- 1 Climate change adaptation & mitigation
- 2 Impact on Biodiversity (Land-use change, pollution, emissions)
- 3 Impacts on ecosystems
- 4 Business Ethic Conduct Culture
- 5 Compliance with Code of Conduct by subcontractor
- 6 Subcontractor /Supplier Working & HS conditions
- 7 Energy
- 8 Impacts on the state of Species
- 9 Communities' rights
- 10 Promotion Local Jobs

- 11 Management of Complaints
- 12 Corruption and bribery incidents
- 13 Equal treatment and opportunities for all Subcontractor / Supplier
- 14 Resource use (inflows & outflows)
- 15 Waste Management
- 16 Measures against violence and harassment in the Subcontractor / Supplier workplace
- 17 Personal safety of consumers and /or end-users
- 18 Comply with Labor and Human Rights by subcontractors and suppliers
- 19 Pollution (water, air and soil)
- 20 Water Resources
- 21 Water Discharges

The factors are marked in three colors. Green represents environmental factors, yellow corresponds to social factors, and blue signifies governance-related factors.

Assessment

The figure illustrates how various factors are evaluated in terms of their impact on Edisun, the environment and society. The upper right-hand corner highlights the factors identified as having both a significant environmental and social impact, as well as a high financial impact on Edisun.

Climate change, biodiversity loss (including land-use changes, pollution, and emissions), and ecosystem health are key sustainability concerns for Edisun. Positive climate impact through the replacement of fossil fuels is crucial. Also, new business opportunities arise with the increase in demand for renewable energy. At the same time, potential negative impacts on ecosystems, land use, and species conservation may arise during construction and ongoing operation and maintenance (O&M) activities. To mitigate these effects, restoration measures and sustainability initiatives are implemented.

Another critical aspect for Edisun is the Compliance with its Code of Conduct by subcontractors. The working conditions and health & safety standards of subcontractors and suppliers are key social considerations, given their essential role in Edisun's activities.

From a governance perspective, a high "business ethics conduct culture" is a fundamental priority and Edisun deeply integrates its Code of Conduct into its corporate culture, as it embodies the company's ethical principles.

2. Environmental information

According to the double materiality assessment, the most relevant environmental aspects are climate change adaptation and mitigation, and the protection of biodiversity and ecosystems.

Given their lower relevance, other environmental aspects—such as pollution, water and marine resources, resource use, and the circular economy—are not covered in detail in this report.

CLIMATE CHANGE ADAPTATION & MITIGATION

Through the deployment and operation of large-scale renewable energy capacity in Europe, Edisun's core business activity has a direct positive environmental impact

by significantly reducing carbon emissions from solar power generation compared to conventional power generation. This core activity represents our primary means and greatest opportunity to contribute to climate change mitigation and adaptation.

In 2024, the total solar production slightly decreased due to the discontinuation of older solar plants and an atypically low level of solar resources. As a result, the reduction in CO₂ emissions also declined slightly compared to the previous year:

Total Solar production 2023:	165 094 MWh
Reduction CO₂:	58 834 tons
Total Solar production 2024:	160 568 MWh
Reduction CO₂:	57 208 tons

Evidence demonstrates that Edisun's most significant contribution to CO₂ reduction stems from its deployment of renewable assets. These assets produce substantially fewer CO₂ emissions compared to conventional power generation methods. Additionally, Edisun's operations and assets play a **pivotal role in diminishing Scope 2 emissions in Europe**. By greening the electricity consumed in companies' operations and activities, Edisun contributes positively to reducing environmental impact (see figure above).

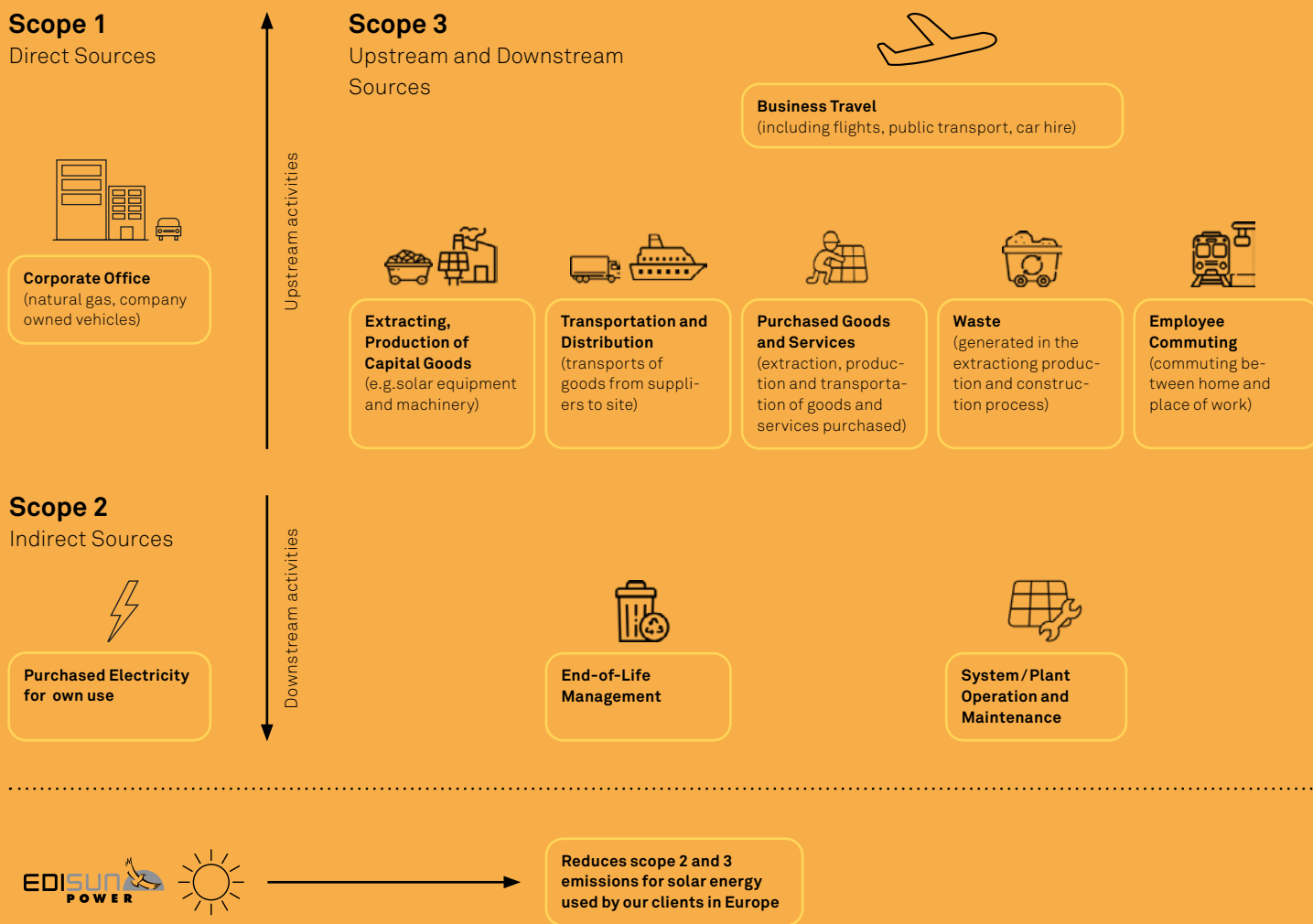
According to the ESRS topics, climate change adaptation & mitigation is one of the most relevant topic. Our strategic plan is influenced by climate change-related impacts, given their direct connection to our core business. These factors are incorporated in our SWOT analysis, where the positive impact of replacing fossil fuel emissions carries significantly weight, alongside growth opportunities driven by the increasing demand for renewable energy.

For Edisun, quantitative GHG emissions reduction targets go hand in hand with the expansion of our operations, the promotion of solar power plants, and the commercialization of renewable energy; all with the aim to contribute in reducing emissions at a global level.

Since direct emissions are essential for Edisun's operations and there are no reference data available for 2023, Edisun has not been able to define reduction targets for its direct emissions yet. However, potential reduction measures will be evaluated during 2025.

For these reasons, quantitative GHG emissions reduction targets, and climate-related factors are not currently linked to the remuneration of the company's governing bodies.

Figure 1 Greenhouse Gas emissions (net) in the solar industry



Impact Risk and Opportunities (IROs)

During the double materiality assessment process, both positive and negative climate change-related impacts were evaluated; however, no actual or potential negative GHG impacts were identified. Mitigation measures are effectively implemented during the construction phase, while GHG emissions during the operation and maintenance of solar plants are limited to the electricity consumed for equipment operation at night.

As previously mentioned, the primary impacts are positive, resulting from the reduction of fossil fuel emissions through the generation of renewable energy from solar plants.

Edisun’s global risk assessment also takes into account potential damages from natural disasters, including for instance atmospheric phenomenon such as DANA named as Isolated High-Level Depression.

In order to further mitigate climate change impacts and risks, the company will develop a comprehensive process in 2025 to identify, assess, prioritize, and monitor climate-related physical risks. This process will also take into account the negative impacts of the recent extreme flood event at the Requena Solar plant in Valencia, Spain. The insights from this assessment will

then be used to define a risk assessment for each facility, considering specific sustainability-related risk, such as extreme weather events and the effects of changes in the average ambient temperatures.

Metrics and targets

Edisun firstly outlined in the 2023 Management Report the savings of CO₂. In addition, for 2024, Edisun further calculated firstly its GHG emissions; identifying the different emissions sources across Scope 1 and Scope 2.

As emissions were not measured in 2023, the company did not set GHG emissions reduction targets for 2024. With the measurement and follow up of the GHG emissions during 2024, potential reduction targets will be defined for 2025.

Energy Consumption

The company’s total energy consumption for its own operations is primarily derived from the auxiliary electricity consumption required to keep the plants running overnight. During periods of lower production or standby, essential equipment such as monitoring, ventilation, and security systems remain powered to ensure safe and efficient operations.

- Energy consumption from own operations in 2023: 653 MWh
- Energy consumption from own operations in 2024: 657 MWh

The slight increase in energy consumption is directly attributable to the lower irradiation observed in 2024, as auxiliary services operate for longer periods during times of reduced irradiation.

Based on energy consumption sources in Spain and Portugal, where the majority of our key solar plants are located, the breakdown of total energy consumption by source is as follows:

- Renewable sources: 52 %
- Non-Renewable sources: 35 %

GHG Emission Inventory

The GHG Emission Inventory was calculated by consolidating the data from all Edisun Power plants in operation. For each plant, all emission sources for Scope 1 and 2 were identified, and the emission factors used are those recommended by the government agencies in each respective country.

During the process, only Scope 2 sources were identified, as the solar plants don't have any Scope 1 emissions, such as fuel consumption for instance. Therefore, the only emissions sources for both Scope 1 and Scope 2 are related to electricity consumption, which is essential for the operation of the auxiliary equipments during the night.


GHG Emissions Inventory 2024

Renewable energy generation	160 567,9 MWh
Total energy consumption	653 MMh
Gasoline consumption	0
Diesel consumption	0
Electricity consumption	653
Self-consumed RE generation	0
Energy intensity (energy consumption (MJ) / billing)	0,00004
Revenue from sale of electricity (KCHF)	14,751 CHF
GHG Emissions Scope 1	0 Ton CO₂ eq
GHG Emissions Gasoline	0
GHG Emission Diesel	0
Fugitive emissions SF6 or refrigerant gas consumption (Ton)	0
GHG Emissions Scope 2	135 Ton CO₂ eq
GHG Emissions Intensity	0,00001
Neutralized GHG Emissions	57.208 Ton CO₂ eq

Main notes:

- Edisun's direct activities do not consume fossil fuels, hence there are no scope 1 GHG emissions
- GHG emissions from scope 3 are not considered
- Intensity indicators are measured according to the value of 2024 Edisun's income
- Given this is the first year GHG emissions are measured, there is no comparison to prior years possible. This exercise will be carried out during 2025.

According to the GHG emissions inventory, the contribution of Edisun to the environment and social activities is the following:

	Production MWh	CO ₂ Reduction (Tons)	Equivalent Trees planted (Trees)	Coal Saving (Tons)	Equivalent Household Consumption (Houses)	Equivalent distance traveled in electrical vehicles (Millions of Kilometers)
Switzerland	1.394	156	7.098	667	271	8
Spain	31.704	9.036	410.709	15.162	8.120	192
Portugal	116.977	43.343	1.970.155	55.943	34.275	708
Italy	1.250	1.012	46.009	598	369	8
Germany	4.404	3.232	146.930	2.106	1.415	27
France	4.839	429	19.482	2.314	944	29
TOTAL	160.568	57.208	2.600.382	76.790	45.394	971

The social and environmental Key-performance-indicators were derived from statistical data provided by government sources and reputable institutions in each country where Edisun Power operates.

Once the origin of energy consumption and the emission sources are analyzed, actions to reduce indirect emissions will be proposed during 2025. Further, Edisun will evaluate its various electricity suppliers during 2025 and consider the possibility of further reducing its proportion of “non-renewable” electricity by only purchasing electricity from renewable sources.

IMPACT ON BIODIVERSITY AND ON ECOSYSTEM

Despite its net positive impact on GHG emission reduction, the generation of renewable energy through solar plants has an impact on the environment. The control of potential negative impacts on biodiversity and ecosystems is key to the viability of our projects; both, during development and in operation.

The impacts of Edisun’s value chain on biodiversity and ecosystems, as well as their dependencies, risks, and opportunities, are carefully considered in our strategy and business model. Edisun is committed to developing solar projects where mitigation measures for negative impacts on biodiversity and ecosystems ensure the projects’ long-term viability, as demonstrated by our current operational solar plants.

For projects under development, such as the Fuencarral project, a comprehensive risk and feasibility study has been conducted, considering all potential impacts on biodiversity and ecosystems while avoiding areas of high biodiversity value or protected zones. The layout of the solar plants is designed to minimize possible envi-

ronmental impacts, with mitigation measures applied as needed to ensure compliance with legal requirements and to optimize land use and biodiversity.

Currently, none of the operational solar plants have significant impacts on biodiversity and ecosystems.

Regarding the Fuencarral project, all sensitive areas have been studied and mapped out, with particular attention given to the Natura 2000 Network. Among the areas within this Network, only three protected areas have been identified with a direct impact:

- ZEC ES3110006—Vegas, Cuestas y Páramos del Sureste de Madrid
- ZEPA ES0000142—Cortados y Cantiles de los ríos Jarama y Henares
- ZEC ES3110001—Cuencas de los ríos Jarama y Henares

The main mitigation measure to minimize the impact on protected areas is to bury the high-voltage line underground.

Edisun uses the double materiality assessment to identify the key impacts, risks, dependencies, and opportunities related to biodiversity and ecosystems. Negative impacts have been identified, particularly in relation to changes in land use and potential adverse effects on ecosystems and biodiversity during construction and operational activities. However, these impacts are largely mitigated through specific measures for each project or throughout the contract’s lifespan.

Each project, including Fuencarral, undergoes a thorough environmental assessment in line with legal

requirements, where all the environmental impacts and aspects are assessed, and public consultations are conducted with the affected communities.

For the plants currently in operation, the only sensitive area near an active plant is the Mogadouro Solar plant, which is located near a National Agriculture Reserve (RAN) Area. However, no negative impacts have been observed from the plant.

Edisun's policies on biodiversity and ecosystems protection are communicated to subcontractors through its EPC and Operation and Maintenance contracts. Contractors are obliged to comply, amongst others, with all applicable environmental regulations throughout the contract period and take all necessary measures to prevent the release or discharge of polluting substances that are incompatible with the applicable regulations, such as the Good Industrial Practices and the projects' permits and authorizations.

Planned actions & compensatory measures

Edisun's commitment to carrying out an effective management of biodiversity and ecosystems is demonstrated by its environmental monitoring of operational solar plants with the most significant impact.

For the most relevant solar plants in operation, an Environmental Management Plan is implemented in accordance with ISO 14001. This includes a dedicated environmental monitoring report and plan with regular monitoring of environmental aspects, in order to detect and mitigate any incident that could affect the biodiversity or ecosystems.

For projects under development, such as the Fuencarral project, the issuance of the environmental permit in 2024 confirmed full compliance with all legal and regulatory environmental requirements. Additionally, mitigation measures were established to ensure compliance with the approved environmental conditions. In this particular case, a specific Environmental monitoring plan has been developed to ensure ongoing compliance with those measures.

Some of the key mitigation measures of the Fuencarral project are:

Main Compensatory Measures applicable to the solar plants of the Fuencarral project in Castilla la Mancha:

- **Compensatory measures for the loss of steppe habitat:** Implementation of agri-environmental measures across more than 400 hectares to promote the coexistence of dryland herbaceous crops (primarily cereals) with steppe bird conservation. Measures include: planting of legumes without harvesting, maintaining unplowed field margins, etc... The estimated budget for the project's entire lifespan is **EUR 3.7 million**.
- **Compensatory measures for the impact of evacuation lines.** Enhancement of existing infrastructure along 23.2 km of high-voltage overhead lines to reduce bird collisions and electrocution risks. The estimated budget over the project's lifespan is **EUR 4.6 million**.
- **Compensatory measures to improve the habitat.** Establishment of plant screens, reptile shelters, fauna ponds, and protection of existing natural vegetation, among other initiatives. The estimated budget is **EUR 0.5 million**.

Main Compensatory Measures applicable to the solar plants of the Fuencarral project in the Community of Madrid:

- **Compensatory measures for the loss of steppe habitat.** Execution of agri-environmental measures on more than 1.685 hectares.
- **Compensatory measures for the impact of evacuation lines.** Ensuring appropriate infrastructure to reduce bird collisions and electrocution risks.
- **Compensatory measures for damage to forest lands,** through repopulation activities, with an estimated budget of **EUR 0.4 million**
- **Compensatory measures to improve the habitat,** through the creation and maintenance of water points, planting and maintenance of grasslands under the panels, installation of pollinator insect hotels, conservation of the network of seasonal or permanent streams and streams, construction works, drainage and measures for the fauna.



Pollinator insect hotels



Water points for fauna

- **Compensatory measures to improve vegetation;** conservation of islands of wild vegetation, maintenance of natural vegetation on the margins of the solar plant and intermediate streets between rows of panels, non-use of herbicides to control vegetation, creation of a network of ecological corridors respecting the existing valleys, and integration of existing tree vegetation.

During 2024, **no environmental incidents** occurred in our projects, in line with our zero incident objectives.

Related to biodiversity and ecosystems, there are two locations from Edisun in sensitive areas:

- Mogadouro Solar plant (68 hectares), near the plant is a National Agricole Reserve. However, no negative impact is generated.
- Fuencarral project (1.651 hectares): Three Natura 2000 Network are affected (mentioned above). With the implementation of mitigation measures, the impacts on these sensitive areas are not considered significant.

There are no impacts on sensitive species resulting from the operation of the plants.

During the environmental evaluation of the Fuencarral project, the following vulnerable or endangered species were identified: imperial eagle, little bustard, great bustard, lesser kestrel, Montagu's harrier, hen harrier, and Ganga Ortega. All necessary protective measures were incorporated, leading to the approval of the environmental permit.

Edisun remains fully committed to environmental stewardship. The company will continue prioritizing the implementation of environmental management systems in accordance with ISO 14001 in future EPC contracts and all O&M activities to ensure compliance with legal environmental requirements and the protection of natural ecosystems.

3. Social information

WORKERS IN THE VALUE CHAIN

According to the double materiality assessment, the compliance with the Code of Conduct by subcontractors and suppliers is the most relevant topic from a social point of view according to Edisun's activities.

Edisun is fully committed to upholding its Code of Conduct across the entire value chain to mitigate any ethical management risks. To achieve this, the company maintains an active ethical code that outlines how we conduct business, respect human rights, and promote corporate sustainability.

This Code of Conduct applies to all workers within Edisun's value chain. Given Edisun's operations, the primary workers are subcontractors responsible for the operation and maintenance of the solar plants. There are no other types of value chain workers that could be materially impacted by Edisun's activities.

In the countries where Edisun operates—Switzerland, Spain, Italy, Portugal, Germany, and France—there is no risk of child labor or forced labor. Nevertheless, Edisun makes a complaints channel available to all value chain workers to report any concerns related to non-compliance with the Code of Conduct.

The **complaints channel** (codeofconduct@edisun-power.com) is a key tool for addressing any issues related to worker conditions or breaches of the ethical code. Additionally, other communication channels, including supervisors, HR representatives, country managers, or the Management Board, are also indicated in the Code of Conduct.

Regarding compliance with subcontractor/supplier working conditions and human resources policies, the operational contract outlines the Human Resources and Health and Safety requirements to be followed by subcontractors.

Subcontractors are expected to implement a health and safety plan in accordance with legal requirements and to comply with applicable safety standards during any operations. The operator remains responsible for the safety of all technical staff, including suppliers, subcontractors, and visitors to the site.

The working conditions and health & safety standards of subcontractors and suppliers are key social considerations for Edisun as we strive to achieve our annual goal of "Zero Accidents."

The company fully complies with health and safety legislation in the countries where it operates and takes all necessary actions to protect all value chain workers, and all other people involved.

In 2024, an annual report for each active photovoltaic asset was issued confirming the absence of any accidents.

Results in 2024:

Health & Safety at work	Target	Edisun Portfolio
Frequency Rate	< 5	0
Severity Rate	0	0
Safety & Environment Drills	1 per year	1 per each PV asset

Communities affected

At Edisun, we continue to promote our social responsibilities to improve the lives of the local communities with which we interact.

For the projects under development, a Corporate Social Responsibility Plan is jointly defined with local authorities, with the idea of generating synergies and mutual benefits, such as the commitment to local hiring.

For our large-scale Mogadouro and Betty photovoltaic plants, in addition to the Edisun complaints channel, a specific complaints mechanism is available to allow local residents to request information about the project and/or file a complaint.

During 2024, Edisun has continued to support local communities, promoting activities with synergies for both parties while the projects are in operation. The most significant ones are described below.

As an example, since 2022, we have developed close relationships with local shepherds to allow sheeps to graze on PV plant sites in Mogadouro (PT)—a natural and sustainable way to enable cheap and efficient vegetation control activities, preventing the use of any type of chemicals in a healthy and protected environment.





In order to improve natural habitats and to protect the sheeps, some shelters were built, reusing damaged photovoltaic modules, thus demonstrating that it is possible and recommended to reuse equipment for various purposes and to use it to protect animals.



In Mina Tó (at the Betty PV plant), during 2024 we performed a safety and environmental drill with the collaboration of the Mogadouro Firefighters Corporation, Civil Protection and local authorities. With this exercise, we develop knowledge of the local safety and security teams and processes. Additionally, we improved the access of local roads to the solar park to increase local accessibility.

Edisun Power proudly continued its sponsorship of Mogadouro's indoor football training academy, enabling the club to provide sportswear for its junior teams and create a new group of future local players aged between 4 and 7 years. Our aim is to promote local involvement, fostering the development of young people through sports participation.

Visit from local school students to Betty PV plant

At the Betty PV plant we welcomed a class from a local school and explained what photovoltaic renewable energy is, how it fits into the environment and how we can all benefit from it in the future.







Some days after the water drained away, Requena resembled the photos on the left. The ground will be covered again with small stones.

4. Governance

General Governance Indicators

Edisun Power Europe Ltd. has high standards when it comes to effective corporate governance, thus ensuring responsible, transparent company leadership and management leading to long-term success. This is key in meeting all the demands of our various stakeholder groups, whether shareholder, customer or the local communities we operate in.

Edisun’s Corporate Governance is described in detail in its Corporate Governance Report. Edisun has a diverse Board composition: 60 % of the Board is independent, including a broad representation of minority shareholders, and 40% of Board members are either representative and/or linked to majority shareholders.

We share below some relevant ESG Governance indicators:

Board Member	Independent	Age Diversity (40 – 49, 50 – 59, over 60)	Board Tenure (1 – 3 y, 4 – 8 y, over 8)
Horst H. Mahmoudi	No	40 – 49	1 – 3 y
Fulvio Micheletti	Yes *	Over 60	Over 8 y
Reto Klotz	Yes *	Over 60	4 – 8 y
José Luis Chorro López	No	40 – 49	4 – 8 y
Marc Klingelfuss	Yes *	50 – 59	1 – 3 y



40% non-independent
60% independent



20% 40 – 45
40% 45 – 49
40% 50 – 55



20% 0 – 2 years
40% 3 – 7 years
40% 8 or more years

The Audit, Nomination and Remunerations Committee are all composed by independent Board members.

Edisun’s Executive Board is the governing body responsible for Edisun’s ESG practice and reporting.

Business ethic conduct and supply chain management

As already mentioned above, risk and opportunities are identified and assessed through its internal risk management practice.

As Edisun operates in a strategic sector particularly exposed, business ethic conduct culture is—and has always been—of utmost importance. This was yet again

re-asserted in the result of the 2024 double materiality assessment, where business ethic conduct culture ranks high in the top priorities identified.

Edisun’s Executive Board has developed high ethical standards embodied in the company’s Code of Conduct.

Edisun chooses to operate only in western Europe and therefore does not undertake business in countries with high risk profiles.

Business conduct at Edisun is governed by Edisun’s Code of Conduct which is designed to be a user friendly and interactive guide for day-to-day activities, axed around its cornerstone moto “**RISE**”—**R**esponsibility, **I**ntegrity, **S**afety and **E**ngagement.

OUR CORPORATE CULTURE

Edisun Powers culture is guided along our four main characteristics

Responsibility



Do business in a professional and ethical manner



Strive for sustainable success



Support, respect and foster human rights in daily business



Always play fair and by the rules

Integrity



Do not use insider information for trading



Ensure true and fair accounting and reporting



Avoid any potential conflicts of interest



Protect our intellectual and physical property at all times



Never tolerate any form of bribery & kickbacks

Safety



Everyone is the first line of defence of our cybersecurity



Privacy of data is always respected and protected



Promote and encourage diversity and inclusion



Health and safety are everyone's concern

Engagement



Pursuit of excellence is our way of working



Communicate with respect and openness



Use social media responsibly and respectfully



See something, say something!

Besides standard statements and expectations for all stakeholders involved in its supply chain, each section of the Code of Conduct contains Q&A and practical examples adapted to Edisun's key activities, fostering a pedagogical and hands on approach for its ethical business conduct.

Edisun's Code of Conduct includes a financial and in-kind contribution policy and Edisun has a **zero tolerance policy** towards corruption and bribery and a clear internal reporting channel, including a whistleblower channel. No such cases were reported in 2024. Additionally, Edisun is also not aware of any cancellation of contracts with business partners due to incidents of corruption in the reporting period.

Further, no political contributions were made by Edisun in any of its jurisdictions and board members have not held positions in public administration bodies in the preceding two years.

As a company dedicated to sustainability, we prioritize the highest standards of quality in the procurement of goods and services. In line with this commitment, we mandate our primary contractors and suppliers to demonstrate adherence to rigorous Sustainable Purchase Policies.

The main objectives are:

- Ensure principles of ethics and integrity, equal opportunities, free competition, transparency and independence to be respected in the purchasing process.
- Promote the preservation of the natural environment through the identification and evaluation of suppliers with a good environmental performance.
- Train and sensitize buyers through ESG aspects.
- Verify suppliers on technical, competitiveness, quality and sustainability criteria including fundamental health and safety aspects.

Edisun favours long-term relationship with trusted suppliers and, in identifying its partners, undertakes a thorough due diligence, including on ESG related matters. In that respect, it is worth noting that the refinancing of Edisun's Spanish portfolio provided an opportunity to reassert Edisun's commitment with the positive independent ESG due diligence. Also, 2024 marked the beginning of a closer partnership with O&M provider Prodiel, for the provision of O&M services for large-scale plant Mogadouro in Portugal; Prodiel is rated "silver" by ESG rating agency Ecovadis in the top 15%. During 2025, this partnership is expected to be further advanced.

Whilst Edisun expects its suppliers to comply with Edisun's Code of Conduct, Edisun is also committed to respect agreed payment terms. These will typically vary between 30 and 60 days depending on the services provided. In 2024, there were no legal proceedings for late payments.

Annex

Table of correspondence of contents of EUROPEAN SUSTAINABILITY REPORTING STANDARDS (ESRS)

ESRS	N° requirement	Description of requirement	Pag
1	General information		
E1	General requirements: scope, double materiality assessment, risk assessment, stakeholders, value chain, reporting process		5–11
E2	General disclosures		All
2	Environmental information		
E1	Climate change		
	ESRS 2 GOV-3	Climate-related considerations in incentive schemes	11
	E1-1	Transition Plan- Objectives and Levers	11
	ESRS 2 IRO-1	Incidents, risks and opportunities	12
	E1-2	Climate related mitigation and adaption policies	12
	E1-3	Actions and resources in relation to climate change policies	12, 14
	E1-4	Climate related targets	12
	E1-5	Energy Consumption mix	12–13
	E1-6	GHG Emissions	13–14
E4	Biodiversity and ecosystems		
	E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	14
	SBM3	Material impacts, risks and opportunities and their interaction with strategy and business model	14
	IRO-1	Process to identify and assess IROs	14
	E4-2	Policies related to biodiversity and ecosystems	15
	E4-3	Actions and resources related to biodiversity and ecosystems	15–16
	E4-4	Targets related to biodiversity and ecosystems	15–16
	E4-5	Impacts metrics related to biodiversity	16

ESRS	N° requirement	Description of requirement	Pag
3	Social Information		
S2	Workers in the value chain		
	SBM-2	Interests and views of stakeholders	16
	SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	16
	S2-1	Policies related to value-chain workers	16
	S2-2	Process for engaging with value-chain workers about impacts	16
	S2-3	Process to remediate negative impacts and channels for value-chain workers to raise concerns	16
	S2-4	Taking action on material impacts on value chain workers	16–17
	S2-5	Targets related to managing impacts risks and opportunities	16–17
S3	Affected communities (Optional information)		17–23
4	Governance information		
G1	Business conduct		
	GOV-I	The role of the governing bodies	24
	IRO-I	Description of the process to identify and assess IROs	24
	GI-I	Business conduct policies and corporate culture	24–25
	GI-2	Management of relationships with suppliers	26
	GI-3	Prevention and detection of corruption and bribery	26
	GI-4	Incidents of corruption or bribery	26
	GI-5	Political influence and lobbying activities	26
	GI-6	Payment practices	26



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