



ESG REPORT 2024



**ENERGY.
SOLUTIONS.
TOGETHER.**

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CEO FOREWORD

The year 2024 marked an important milestone in Elevion Group's sustainability journey. As the European energy landscape continues its rapid transformation, we strengthened our role as a key partner in enabling the transition towards a low-carbon, energy-efficient, and technology-driven future. This report reflects not only our progress, but also the growing maturity of our ESG governance, data systems, and strategic planning.

For the first time, Elevion Group prepared an ESG report in partial alignment with European Sustainability Reporting Standard (ESRS), applying the principles of the Corporate Sustainability Reporting Directive. Selected environmental and social indicators—including Scope 1 and Scope 2 greenhouse gas emissions—were subjected to independent limited assurance. This marks a major step forward in elevating our transparency and accountability to the expectations of our shareholder, customers, employees, and communities.

In 2024, we completed our first Double Materiality Assessment, covering our entire value chain and identifying the sustainability topics with the greatest relevance to Elevion's impacts and longterm financial resilience. The outcomes of this assessment directly shaped our governance updates, strategic objectives, and the continued evolution of our sustainability framework.

The Elevion Group continues to deliver strong performance across its three strategic business pillars—Building Energy Solutions, Green Energy, and Energy for Industry. These activities directly support the decarbonisation of European industry, municipalities, and households. Our contributions include largescale photovoltaic installations, biogas and biomethane production, battery storage, energy-efficient technical building systems, and digitalisation of industrial and energy processes. In 2024 alone, approximately 60% of our turnover was associated with Taxonomy-eligible and Taxonomy-aligned activities, including 32% from Taxonomy-aligned activities, reflecting the strong orientation of our business toward climate change mitigation.

Consistency with the longterm ambitions of our parent company, ČEZ a.s., remains a cornerstone of our strategy. We continue to contribute to ČEZ Vision 2030, particularly in areas such as gender diversity in leadership, training in the Code of Conduct and ESG topics, responsible corporate citizenship, and the expansion of green energy and energy-efficiency solutions across Europe.

In 2024, we revised our climate targets to improve accuracy and

reflect a more robust data baseline. With the establishment of a new Scope 2 baseline, Elevion Group is now committed to achieving a 50% reduction in Scope 2 emissions by 2035, while maintaining our longterm ambition to achieve carbon neutrality across Scopes 1 and 2 by 2040. These commitments are supported by targeted actions including the integration of renewable energy solutions, electrification of fleet, efficiency improvements, and transition pathways for fossil-based assets.

As we enter the next phase of our sustainability transformation, Elevion Group remains firmly committed to enabling the European energy transition—while operating with integrity, responsibility, and a longterm vision for climate neutrality.

This Sustainability Report is a consolidated non-financial report of Elevion Group. The list of consolidated entities is in line with Elevion Group Annual Financial Report 2024.

I extend my deepest gratitude to our employees, partners, stakeholders, and customers for their invaluable contributions to this endeavour.

"Our responsibility extends far beyond delivering technical solutions. We are committed to accelerating Europe's energy transition by combining innovation, integrity, and climate ambition. ESG is not an add-on—it is the way we do business."

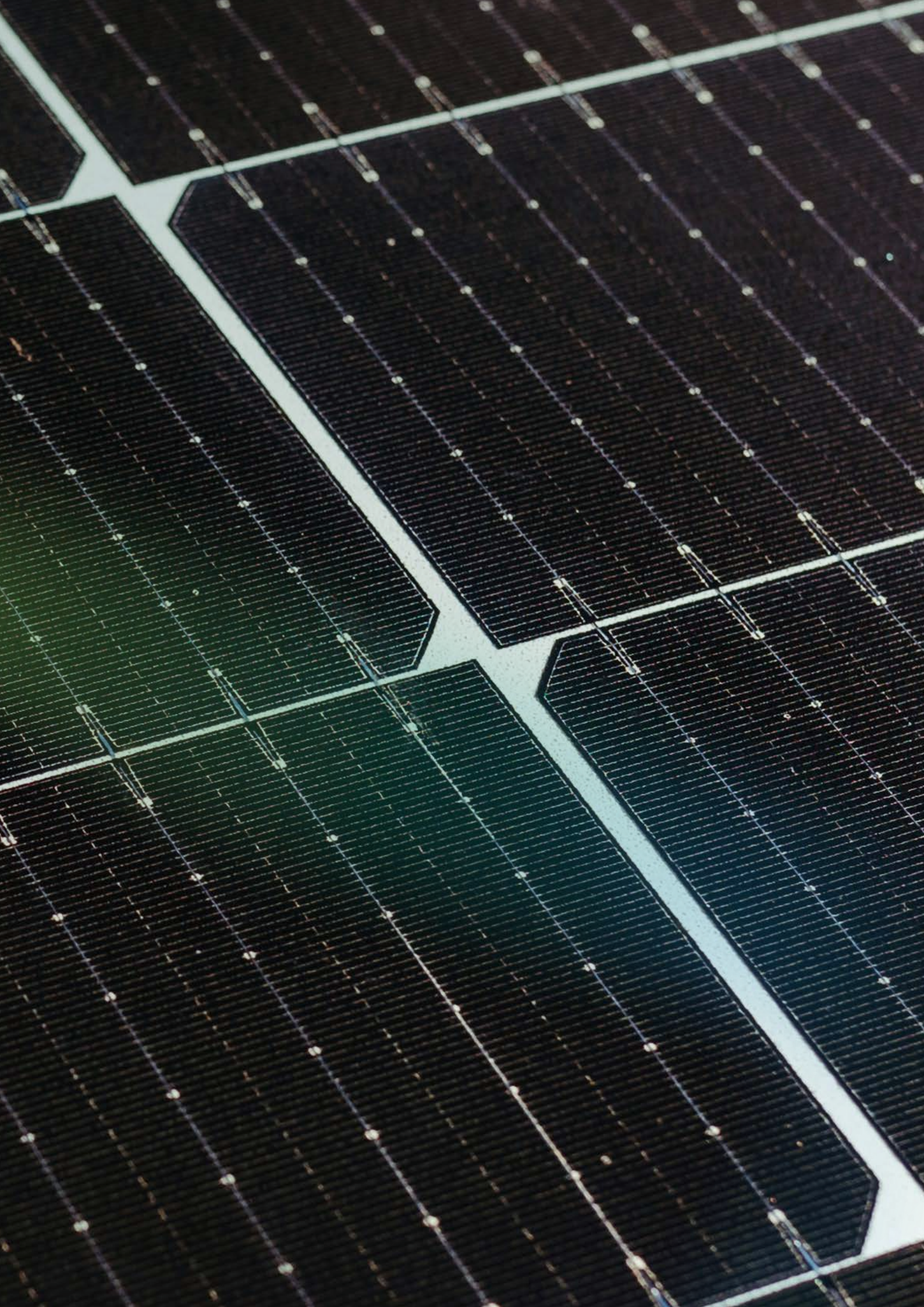


Jaroslav Macek
Chief Executive Officer



ESRS 2 GENERAL DISCLOSURES

INTRODUCTION



BASIS FOR PREPARATION

DISCLOSURE REQUIREMENT BP-1 – GENERAL BASIS FOR PREPARATION OF SUSTAINABILITY STATEMENTS

Elevion Group B.V. has prepared this sustainability statement on a **voluntary basis**, in partial alignment with the European Sustainability Reporting Standards (ESRS) as adopted under Commission Delegated Regulation (EU) 2023/2772, despite not being directly in scope of the Corporate Sustainability Reporting Directive (CSRD) (Directive (EU) 2022/2464) and the EU Taxonomy Regulation (Regulation (EU) 2020/852). This voluntary report supports the consolidated sustainability reporting of the parent company, **ČEZ, a.s.**, and reflects Elevion Group's commitment to transparency, ESG integration, and continuous improvement.

The sustainability statement is prepared on a **consolidated basis**, aligned with the scope of consolidation used for the financial statements. All subsidiaries mentioned in Appendix 1 that were included in the consolidation are exempt from preparing individual sustainability statements.

The statement also covers the **upstream and downstream parts of the company's value chain**, including information on significant impacts, risks, and opportunities identified through a **double materiality assessment**.

For the first time, selected sustainability indicators disclosed in this report were subject to **limited assurance** by an independent third-party auditor. The scope of assurance engagement covered the double materiality assessment process as described under IRO-1, the disclosures under Article 8 of the EU Taxonomy Regulation, and the following ESRS indicators: E1-1 Transition plan for climate change mitigation; E1-2 Policies related to climate change mitigation and adaptation; E1-4 Targets related to climate change mitigation and adaptation; E1-5 Total energy produced; E1-6 Scope 1 emissions, Scope 2 emissions (location and market based); E3-4 Water consumption, water withdrawals and water discharges, consumption in high water stress areas; E5-5 Total waste generated; S1-6 Characteristics of the undertaking's employees; S1-8 Collective bargaining coverage and social dialogue; S1-9 Diversity metrics; S1-12 Persons with disabilities; S1-13 Training and skills development metrics; S1-14 Health and safety metrics and S1-17 Incidents of discrimination and corrective actions taken.

This step reflects Elevion Group's commitment to enhancing the credibility and reliability of its sustainability disclosures. Additional details are provided in the **Assurance Statement** annexed to this report.

The company has **not applied any of the optional exemptions** under ESRS 1, including:

- The omission of information related to **intellectual property, know-how, or innovation outcomes**, and
- The deferral of disclosure concerning **future developments or matters currently under negotiation**.

The ESG policies and actions disclosed in this report currently apply to Elevion Group entities. While the report covers upstream and downstream value chain impacts, formal ESG integration into supplier and customer relationships (e.g. through a Supplier Code of Conduct or contractual ESG clauses) is still under development. Elevion Group plans to expand value chain coverage in future reporting cycles.

Disclaimer

This document is a voluntarily issued ESG Report prepared in partial alignment with the European Sustainability Reporting Standards (ESRS) and the EU Taxonomy Regulation. It is not a statutory sustainability report under any national legislation.

Selected environmental and social indicators disclosed herein were subject to limited assurance by an independent third-party auditor. Hence, the report does not claim full compliance with all ESRS disclosure requirements and remains subject to ongoing development and refinement.

Strategic Alignment with ČEZ Vision 2030

Elevion Group's workforce-related actions and selected targets are partially aligned with ČEZ Vision 2030. Key areas of alignment include:

- **Female Representation in Leadership:**

ČEZ Group has set a formal target to increase the share of women in management to 30% by 2030. Elevion supports this ambition and contributes through its own diversity efforts. However, due to industry-specific constraints and the technical nature of Elevion's operations, the Group anticipates that total female representation in management may remain below 20%. Instead, Elevion has set a formal target of 30% female

representation in top management (executive and supervisory functions) by 2030, with active monitoring of diversity metrics and inclusive hiring practices. Elevion continues to implement measures that promote inclusive leadership and gender diversity, thereby supporting ČEZ in achieving its group-wide target.

- **Training in the Code of Conduct:**
Elevion has committed to training at least 95% of employees annually in the Code of Conduct.
- **Decent Corporate Citizenship:**
Elevion maintains a zero-tolerance approach to unethical conduct, supported by its whistleblowing system and internal compliance framework.
- **GHG Intensity Reduction:**
Elevion contributes to ČEZ's emission intensity reduction targets through its core business activities. These include the deployment of photovoltaic systems, and energy efficiency solutions. The Group is working with ČEZ to develop methodologies for estimating these impacts and aligning them with group-level decarbonisation metrics.
- **Biodiversity and Ecosystems:**
While biodiversity was assessed as non-material for Elevion in the Double Materiality Assessment, it is a strategic priority for ČEZ under Vision 2030. Elevion contributes to this ambition through its renewable energy projects, particularly ground-mounted photovoltaic installations delivered by Belectric, where biodiversity considerations are integrated into Environmental Impact Assessments (EIA) and mitigation measures (e.g. habitat preservation, compensation planting). Elevion will continue to monitor regulatory developments and reassess the need for a formal biodiversity transition plan in future reporting cycles.

Other ČEZ Vision 2030 topics not explicitly disclosed in this report (e.g. community engagement, consumer-facing initiatives) were assessed as not being material or not being applicable to Elevion Group's business model and operations.

DISCLOSURE REQUIREMENT BP-2 – DISCLOSURES IN RELATION TO SPECIFIC CIRCUMSTANCES

Elevion Group B.V. confirms the following disclosures in relation to specific circumstances, as required under ESRS 2 BP-2:

1. Time horizons

The company has **not deviated** from the standard time horizons defined in ESRS 1 Section 6.4:

- **Short-term:** Current accounting period (2024)
- **Medium-term:** Up to six years (2025-2030) – to align with ČEZ Vision 2030.
- **Long-term:** Beyond six years (after 2030)

2. Value chain estimation

Due to limited availability of primary data, Elevion Group has used **indirect estimation methods** for certain value chain indicators and performed a separate scope-3 materiality assessment by taking into account the below variables and analysed the most relevant scope-3 categories for the Group and ranked them by relevance.

These include:

- Sector averages and ESG screenings
- Public databases
- Science-based benchmarks
- Specialised platforms (e.g. EcoVadis, CDP)

Rank	Indicator
1	Scope 3.1 (Purchased Goods & Services)
2	Scope 3.11 Use of Sold Products
3	Scope 3.12 End of life treatment of sold products
4	Scope 3.2 Capital Assets
5	Scope 3.3 Emissions related to energy and fuel consumption not included in scope 1 & 2

While Scope 3 categories were assessed for relevance and materiality, Elevion Group has not yet disclosed numerical Scope 3 emissions in this reporting period. The relevance ranking supports future disclosure planning and prioritisation.

3. Sources of estimation and outcome uncertainty

In accordance with ESRS 1 Section 7.2, the following uncertainties were identified:

- Limited availability of primary supplier data
- Use of proxy data and sector averages
- Allocation challenges across multi-tier supply chains

These limitations are disclosed transparently and will be addressed through improved data collection and supplier engagement.

3.1 Quantitative metrics subject to high measurement uncertainty include:

3.1.1 Environmental data:

- **Scope 2 emissions:**
In several cases, Elevion lacked supplier-specific data on the origin of electricity (renewable vs. fossil). To estimate Scope 2 emissions, the **location-based method** applied national grid average emission factors, while the **market-based method** used **residual mix factors**.
- **Fleet emissions:**
where business vs. private use of vehicles was estimated based on internal assumptions, impacting Scope 1 and Scope 3 emissions.
- **Water consumption and discharge:**
Estimations were required for smaller entities unable to provide measured data. For water consumption, Elevion applied a per-employee coefficient derived from reference companies with similar activities and available measurements. This coefficient was then multiplied by the headcount of companies lacking data. For water discharge, Elevion used group-specific coefficients based on a relevant study supported by Eurostat data, tailored to operational profiles.
- **Waste volumes and treatment data:**
Here, internal benchmarks were used due to inconsistent or missing data from subsidiaries.

The estimation uncertainties described above relate to metrics disclosed under ESRS E1 (energy consumption), E3 (water consumption and discharge) and ESRS E5 (resource outflow-waste).

3.1.2 Social data:

Some social indicators disclosed in this report are based on estimates due to incomplete primary data. Specifically:

- **Pay Gap and Remuneration Ratio:**
Calculated using aggregated entity-level data (not individual-level) due to GDPR constraints; methodology to be aligned with ESRS S1 by 2025.
- **Non-Employee Workforce:**
Not yet disclosed; phase-in applied, with systematic collection planned by 2026.

4. Description of the Resulting Level of Accuracy

The accuracy of disclosed sustainability data varies by indicator and source:

4.1 Environmental Data

- Scope 1 emissions: Moderate accuracy – based on direct fuel consumption data and invoices, but subject to allocation assumptions for multi-use vehicles.
- Scope 2 emissions: Moderate accuracy – estimated using location-based and market-based methods with national grid factors and residual mix coefficients; supplier-specific data often unavailable.
- Water consumption/discharge: Low accuracy – estimated for smaller entities using per-employee coefficients derived from Eurostat and sector benchmarks.
- Waste volumes: Low accuracy – based on internal benchmarks where subsidiary data was incomplete.

4.2 Social Data

- Employee headcount, gender diversity, training hours: Moderate accuracy – consolidated from local HR systems; minor inconsistencies were observed in headcount while consolidating employees under alternative contracts such as trainees, interns, etc., etc.
- Health & safety metrics: Moderate accuracy – based on internal audits and ISO 45001 coverage; excludes non-employees and subsidiaries outside Europe.
- Pay gap and remuneration ratio: Moderate accuracy – calculated at the entity level using aggregated data; methodology deviates from ESRS due to GDPR constraints.
- Non-employee workforce and value-chain workers: Not yet disclosed – phase-in applied; data collection planned for 2026–2027.

Overall, estimation uncertainty is highest for indicators relying on proxy data or coefficients (e.g. water, waste, fleet emissions) and for social metrics outside core HR systems (e.g. non-employee data, supplier practices).

5. Planned Actions to Improve Accuracy

To enhance the reliability and accuracy of sustainability data, Elevion Group will implement the following measures:

5.1 Deployment of ESG Reporting Tool (Sphera)

- Automate data collection and validation for environmental, social, and governance indicators.
- Integrate Sphera with financial and operational systems to reduce manual input and estimation errors.

5.2 Introduction of a Group-wide HR

Information System (HRIS)

- Standardise workforce data across all subsidiaries.
- Improve accuracy of social metrics (e.g. diversity, training hours, remuneration ratios) through centralised reporting.

5.3 Development of ESG Handbooks

- Prepare dedicated handbooks for Environmental, Social, and Governance domains.
- Define standardised methodologies, data sources, and calculation rules for all ESRS indicators.

5.4 Training and Capacity Building

- Conduct regular training sessions for ESG data owners and finance teams.
- Focus on ESRS requirements, estimation methodologies, and automation of tools (Sphera, HRIS, ERP, etc).

5.5 Supplier Engagement and Value Chain Integration

- Introduce ESG clauses in supplier contracts.
- Expand primary data collection from suppliers to reduce reliance on proxy data for Scope 3 and other indicators.

5.6 Continuous Improvement

- Review post-assurance feedback annually.
- Update internal methodological guides and handbooks based on evolving ESRS standards and auditor recommendations.

6. Use of Standards

Elevion Group applies the following standards where relevant:

- **ISO 14001:** Environmental management systems
- **ISO 45001:** Occupational health and safety management systems
- **ISO 50001:** Energy management systems
- **ISO 9001:** Quality management systems

These standards support Elevion's ESG commitments and risk management framework.

7. Cross-References to the Annual Report

To ensure consistency and avoid duplication, the following disclosures are referenced in the Annual Report:

- Breakdown of total revenues by significant sectors (IFRS 8)

8. Phase-in Provisions

Elevion Group has **applied** phase-in provisions in accordance with Appendix C of ESRS 1. Please refer to Disclosure Requirement IRO-2 for more details and Appendix 3 of this report.

Due to the first-time application of ESRS-based reporting and the current maturity of data collection processes across the Group and its value chain, certain ESRS required information has not been included in this sustainability statement due to the unavailability of sufficiently reliable data at the reporting date. In particular, Elevion Group has not disclosed numerical information for ESRS E1-6 Scope 3 greenhouse gas emissions, ESRS E5-4 Resource inflow and has not yet disclosed information for ESRS S1-7 characteristics of non-employee workers. In addition, the Group has applied phase-in provisions in relation to ESRS E1-9, E3-5, E5-6, S2-4 and S2-5, as set out in this report. Elevion Group expects to improve the completeness of these disclosures in future reporting periods as methodologies, systems and source data continue to develop.



GOVERNANCE

DISCLOSURE REQUIREMENT GOV-1 – THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

Elevion Group B.V. is governed by a four-member Management Board, which serves as the statutory executive body. The company is represented jointly by two board members in accordance with its Articles of Association.

Oversight is provided by a three-member Supervisory Board, appointed by the sole shareholder, ČEZ a.s. There are currently no elected employee representatives in the Supervisory Board, and no active trade union at the level of Elevion Group B.V.; employee representation is organised at the level of individual subsidiaries. The highest authority of the company is the General Meeting, exercised by CEZ Holdings B.V. as the sole shareholder. Elevion Group B.V. does not maintain a separate Audit Committee; audit oversight is handled at the shareholder level.

Board of Directors and Management: Board of Directors Elevion Group B.V. is governed by a four-member Management Board, which serves as the statutory executive body. The company is represented jointly by two board members in accordance with its Articles of Association.

- **Jaroslav Macek** Member since 1. 4. 2018, Chairperson since 1. 4. 2018, Chief Executive Officer with extensive experience in energy services, international operations, and strategic transformation across EU markets.
- **Miroslav Šindelář** Member since 8. 4. 2016, skilled in corporate affairs, with broad knowledge of group structures, governance, and operational integration.
- **Derk Berend Blik** Member since 8. 4. 2016, expert in Dutch legal, tax, and accounting frameworks, with long-standing experience in cross-border corporate governance.
- **Martina Kubešová** Member since 1. 2. 2020, brings strong expertise in financial planning, project governance, and investment oversight.

The Management Board is collectively responsible for strategic direction, including oversight of sustainability-related impacts, risks, and opportunities. These responsibilities are embedded in board mandates and performance-linked contracts. The board regularly reviews the business model and strategic goals, integrating ESG considerations and ensuring compliance with evolving legal frameworks.

The Management Board of Elevion Group consists exclusively of executive members responsible for the day-to-day management of the company. There are no non-executive members within the Management Board.

Supervisory Board: Oversight is provided by a three-member Supervisory Board (non-executive management), appointed by ČEZ a.s., the ultimate parent company of Elevion Group B.V. The appointment reflects the shareholder's commitment to strong governance and sector expertise.

Current members:

- **Pavel Cyraní** – Vice-Chairman of the Board of Directors of ČEZ a.s., Chief of the Sales and Strategy Division, Deputy CEO for Strategic Development.
- **Martin Novák** – Member of the Board of Directors of ČEZ a.s., Chief Financial Officer
- **Martina Skopová** – Legal and compliance professional with experience in corporate governance and internal audit.

Executive Management – ESG & Risk Governance Roles: The following members of the executive management of Elevion Group B.V. play a direct role in group sustainability governance and risk oversight:

- **Lucie Vosečková** – Head of Governance, Risk & Compliance. Member since 2023. Responsible for risk management, internal controls, and compliance processes related to sustainability reporting.
- **Paulína Friedlová** – Head of Group Marketing & ESG. Member since 2022. Leads ESG strategy, reporting, and stakeholder engagement across Elevion Group.

- **Jiří Pecka** – Chief Financial Officer Member since 2020. Supports ESG reporting and risk management processes in coordination with Lucie and Paulína.

Other executive management members are listed in the Elevion Group Annual Report and are also indirectly involved in sustainability governance.

Percentage of members of administrative, management and supervisory bodies by gender	Number
Percentage of women in Board of Directors	25 %
Percentage of men in Board of Directors	75 %
Percentage of women in Executive Management	29 %
Percentage of men in Executive Management	71 %
Percentage of women in Supervisory Board	33%
Percentage of men in Supervisory Board	67%

All members of the Management Board of Elevion Group B.V. are considered independent, resulting in 100 % independence.

Elevion Group B.V. is a commercial legal entity governed by its Articles of Association and applicable national and international legal frameworks. The Articles of Association define the company's scope of business and the competencies of its corporate bodies. Additional responsibilities and procedures are outlined in the Organisational and Signature Rules of Elevion Group B.V.

Each member of the company's governing bodies is expected to act with the diligence of a prudent manager.

The Management Board is responsible for the strategic direction of the company, including the regular review of the business model and corporate strategy. This includes the identification, assessment, and management of environmental, social, and governance (ESG) risks, impacts, and opportunities that may influence the company's competitiveness and long-term value creation. These include, but are not limited to:

- Environmental risks (e.g. climate change, water),
- Social factors (e.g. working conditions, human rights),
- Governance issues (e.g. transparency, anti-corruption)

Based on these assessments, the board develops and updates policies and action plans aligned with strategic objectives, **including** sustainability targets. These may encompass initiatives such as reducing energy consumption, enhancing workplace safety and well-being, and strengthening responsible corporate **governance**.

Oversight of these areas is ensured through internal controls and regular audits. The board is supported by specialised departments and experts who provide input and analysis. Communication and consultation on ESG matters occur across the Management Board, department directors, and designated specialists. Final decisions on the implementation of strategies and sustainability goals rest with the Management Board.

The responsibilities of the Management Board regarding ESG are embedded in the company's internal governance framework and reflected in board mandates and performance-linked contracts. These responsibilities include:

- Integrating ESG considerations into strategic planning and risk management,
- Overseeing the implementation of sustainability-related policies and initiatives,

- Ensuring compliance with evolving legal and regulatory requirements,
- Monitoring progress toward strategic sustainability goals.

Disclosure of description of management's role in the governance processes, controls and procedures used to monitor, manage and oversee impacts, risk and opportunities, including:

The management's role in overseeing sustainability-related impacts, risks, and opportunities is embedded in the governance framework of Elevion Group B.V., as defined in the company's Articles of Association, Organisation & Signature rules. These documents establish the company's legal status, scope of business, internal structure, and the responsibilities and competencies of its corporate bodies and senior management.

The Management Board plays a central role in defining strategic objectives, including those related to sustainability. It is responsible for:

- Setting and approving the company's strategic direction, including ESG-related goals;
- Regularly reviewing and updating the business model and strategy in light of environmental, social, and governance risks and opportunities;
- Ensuring that appropriate governance processes and internal control mechanisms are in place to monitor and manage sustainability-related matters;
- Overseeing the implementation of policies and action plans aimed at achieving strategic and sustainability objectives.

To ensure effective oversight, Elevion Group B.V. has implemented a system of internal and external audits. The internal audits are conducted in cooperation with the internal audit department of ČEZ, a. s. and include:

- Regular internal audits at both central and operational levels;
- Compliance reviews and risk assessments;
- Reporting to the Supervisory Board;
- Monitoring the implementation and effectiveness of corrective and preventive measures.

Responsibilities for executing and monitoring sustainability-related activities are delegated to specialised departments. Each department is led by a designated director who is accountable for their area and reports directly to the Management Board. These directors are responsible for:

- Identifying and assessing ESG-related risks and opportunities within their domain;
- Implementing relevant policies and controls;
- Ensuring data quality and timely reporting for sustainability disclosures.

In 2023, the Management Board of Elevion Group B.V. approved three strategic sustainability goals for 2030:

1. **Provide decarbonisation and high-efficiency energy solutions to customers across EU markets**
 - Green energy solutions
 - Innovative solutions
2. **Grow and develop Elevion Group's responsibility in line with ESG principles**
 - Sustainable procurement
 - Availability and retention of skilled workforce
3. **Reduce greenhouse gas emissions and achieve carbon neutrality**
 - CO₂ reduction

These goals are documented in a separate strategic framework approved by the Management Board. Each goal is supported by specific measures, and performance indicators (KPIs), which are monitored regularly and evaluated annually. The results are reported to the Management Board, which retains final decision-making authority on adjustments to strategy and implementation.

In 2025, responsibilities for these strategic areas were defined and assigned within the ESG Steering Committee, which serves as the coordinating body for sustainability governance across Elevion Group B.V. The committee ensures cross-functional alignment, monitors implementation progress, and supports the Management Board in integrating ESG considerations into strategic and operational decision-making.

The ESG Steering Committee is currently working to formalise these assignments through updated mandates, role descriptions, and performance-linked objectives. This process is expected to be completed in the course of 2025.

The strategic sustainability goals may be reassessed in the future in response to evolving regulatory frameworks, such as EU-level ESG legislation. Where applicable, performance indicators (KPIs) linked to these goals are reflected in the annual objectives of responsible departments and are monitored on a semi-annual basis.

Communication and Oversight of Sustainability at Elevion Group B.V.

Communication and Evaluation Processes

Elevion Group B.V. conducts regular **evaluations** of progress toward its 2030 strategic sustainability goals. These evaluations are coordinated by the ESG Steering Committee and serve as a basis for the **annual review by the Management Board**, which holds ultimate responsibility for strategic oversight.

In addition to board-level governance, **regular operational updates and coordination** occur through:

- **Management meetings**, held regularly, where sustainability-related developments, regulatory updates, and implementation progress are discussed;
- **Ongoing coordination** between ESG and finance department, particularly during the ESG reporting and audit periods, when synchronisation intensifies to a weekly or more frequent basis.

Currently, **no additional specialised governance bodies or procedures** exist beyond the ESG Steering Committee and the mechanisms described above for managing sustainability-related impacts, risks, and opportunities.

Data Collection and ESG Coordination

Elevion Group has established a cross-functional ESG Steering Committee and a network of ESG professionals at both the parent company and subsidiary levels. This structure ensures effective coordination, data collection, and consolidation for non-financial reporting in line with CSRD-ESRS.

At the group level, a team of ESG managers is responsible for:

- Coordinating the collection of quantitative and qualitative ESG data;
- Supporting subsidiaries in data reporting and methodology;
- Performing plausibility checks and consolidating data for group-level reporting.
- Each subsidiary has designated ESG contacts responsible for timely and accurate data submission. While the parent-level ESG team supports quality assurance, subsidiaries remain accountable for the accuracy and completeness of their own data.

- This decentralised model ensures that ESG data is collected close to operations while maintaining consistency and oversight at the group level. During the audit and reporting period, coordination intensifies through regular synchronisation between the ESG team and relevant departments, such as Finance, HR, Governance Risk and Compliance, Procurement, etc.

DISCLOSURE REQUIREMENT GOV-2 – INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

During the reporting period, Elevion Group B.V.'s Management Board was regularly informed about sustainability-related matters, including strategic goals, ESG risks and opportunities, and progress on CSRD implementation. The board receives structured updates on the fulfilment of strategic sustainability goals, with additional briefings provided as needed during the bi-weekly board meetings or through direct communication with individual board members.

In case of unexpected events or emerging ESG risks, the Management Board is notified **immediately**, and the Supervisory Board is informed **if the matter is deemed material or requires oversight**.

The **Supervisory Board** is updated on sustainability matters **on an ad hoc basis**, typically in connection with internal audit findings, risk evaluations, or strategic decisions. These updates are provided by the Management Board and include summaries of validated impacts, risks, and opportunities as outlined in **IRO-1**.

Elevion Group B.V. adopted a formal **Risk Management Policy** in 2023 which was recently updated and approved by the Management Board. Policy outlines the principles, roles, and procedures for risk identification and evaluation. This policy is applied across financial, strategic, operational, and compliance risks, and is being expanded to include **ESG-related risks**. Risk evaluations are updated **annually** and presented in report form to the Management Board.

The Management and Supervisory Boards support the company's **low-emission development strategy**, particularly in relation to climate change mitigation and greenhouse gas reduction. Strategic sustainability goals for 2030 were approved by the Management Board and include decarbonisation, ESG integration, and carbon neutrality. These goals are monitored through performance indicators and reviewed regularly.

All validated significant impacts, risks, and opportunities identified in the double materiality assessment (IRO-1) were addressed by the relevant governance bodies during the reporting period.

DISCLOSURE REQUIREMENT GOV-3 – INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

Elevion Group B.V. integrates sustainability-related performance into the variable remuneration of top management through ESG-linked KPIs, substantially aligned with the strategic framework of ČEZ Vision 2030.





Key Characteristics of the Incentive Scheme:

- The scheme applies to selected members of the Management Board and senior executives (such as CEO, CFO and Head of ESG).
- ESG performance is assessed annually by governing bodies and forms part of the variable remuneration component.

Sustainability-Related Targets: The ESG-linked KPIs include in 2024:

1. ESG Rating Performance: Improvement of Elevion Group’s ESG rating in line with ČEZ Vision 2030 ambitions.
2. Strategic ESG Measures: Implementation of mid-term ESG commitments, including decarbonisation, compliance, and stakeholder engagement.

Integration into Remuneration Policy:

- ESG KPIs are embedded in the annual performance review and bonus calculation framework.
- The ESG component typically represents 5-10% of the total variable remuneration.

ESG-related performance is evaluated at two levels. At the Elevion Group B.V. level, top management objectives are assessed by ČEZ, a.s. as part of the executive bonus framework. At the subsidiary level, Elevion Group B.V. evaluates the fulfillment of strategic sustainability goals. Performance is assessed by the relevant body, typically the supervisory board of the relevant entity.

DISCLOSURE REQUIREMENT GOV-4 – STATEMENT ON DUE DILIGENCE

Elevion Group B.V. has implemented a sustainability due diligence process that is integrated into its governance, strategy, and business model. This process is designed to identify, assess, and address actual and potential adverse impacts across environmental, social, and governance areas, in line with the principles of the UN Guiding

Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

a) Integration into Governance, Strategy, and Business Model

Due diligence is embedded in Elevion Group B.V.’s internal governance framework through the ESG Steering Committee, the Management Board, and the risk management system. It is reflected in strategic planning (SBM-1), the double materiality assessment (IRO-1), and the identification of ESG risks and opportunities. These processes inform the company’s sustainability goals and business decisions.

b) Stakeholder Engagement

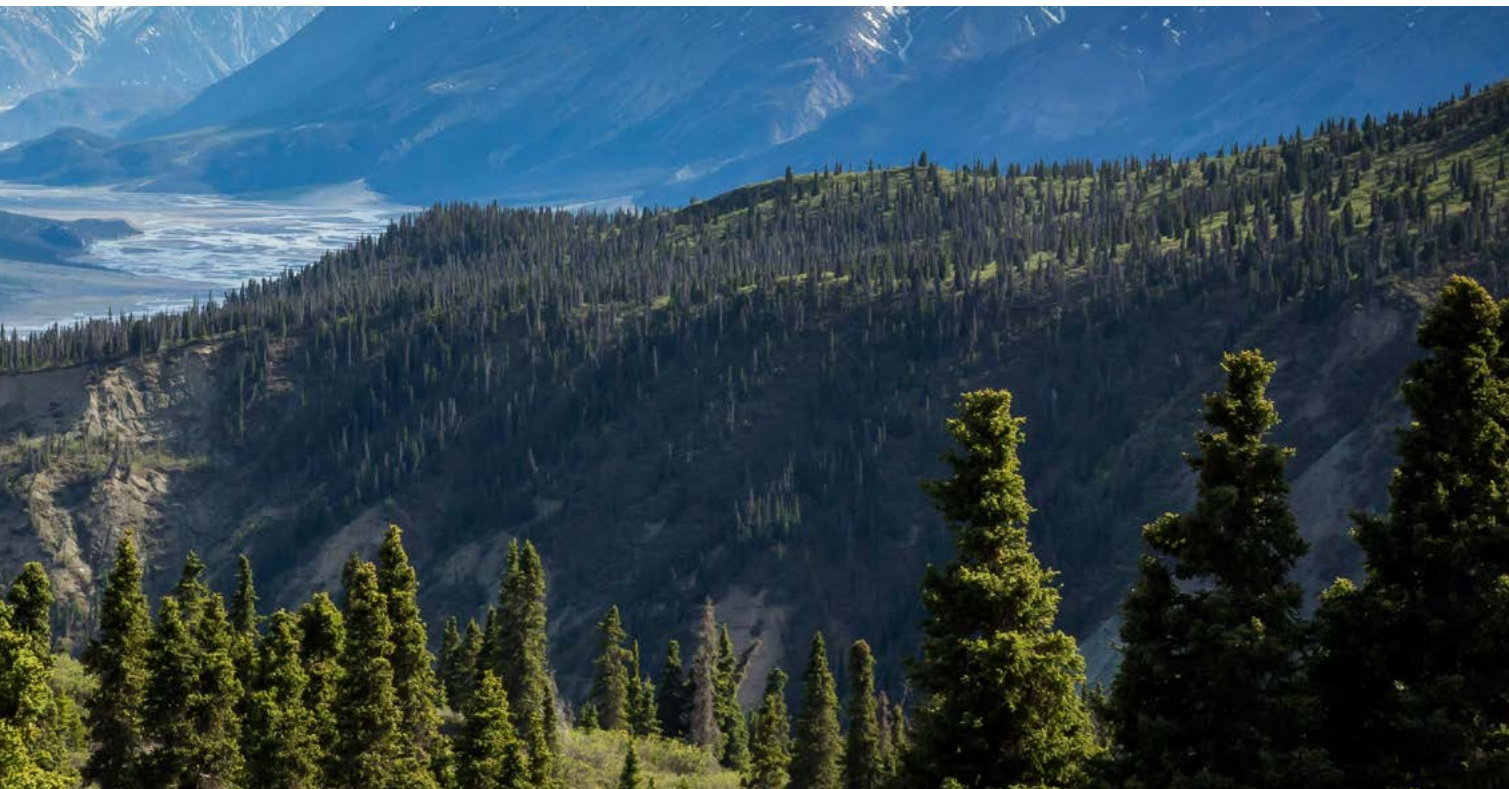
Relevant stakeholders are engaged throughout the due diligence process. This includes internal stakeholders (e.g. ESG managers, finance, HR, operations) and external stakeholders (e.g. suppliers, customers, municipalities). Engagement occurs via structured consultations, supplier questionnaires, and ESG coordination meetings. Stakeholder views are considered in the materiality analysis and risk assessments.

c) Identification and Assessment of Adverse Impacts

Adverse impacts are identified through the double materiality assessment (IRO-1), internal audits, and risk mapping exercises. These cover own operations, upstream suppliers, and downstream customers. The assessment includes environmental risks, social risks, and governance risks.

d) Actions to Address Adverse Impacts

Where material adverse impacts are identified, Elevion Group B.V. takes corrective and preventive actions. These include policy updates, supplier engagement, and internal process improvements. Actions are coordinated by the ESG Steering Committee and relevant departments.



e) Monitoring and Communication

The effectiveness of due diligence actions is monitored through internal audits, and feedback loops with stakeholders.

The due diligence process is coordinated by the ESG Steering Committee and overseen by the Management Board, with responsibilities defined in governance mandates.

DISCLOSURE REQUIREMENT GOV–5 – RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

Elevion Group B.V. has established a structured and controlled process to ensure the reliability, accuracy, and completeness of its sustainability reporting in accordance with ESRS requirements.

1. Governance and Responsibilities

The ESG reporting process is coordinated by the group ESG Manager in close cooperation with the CFO and the accounting department. Specific roles and responsibilities for data collection and validation are assigned across the Environmental (E), Social (S), and Governance (G) domains.

2. Data Collection and Methodology

A methodological guide has been developed to ensure consistent definitions and data quality across the Group. Quantitative data is collected using a standardised group-wide template. Responsible persons at the subsidiary level perform initial data entry and conduct spot checks for accuracy. Consolidated data is reviewed by the group ESG Manager, who perform parallel validations.

3. Internal Controls and Assurance

Internal controls include:

- Defined segregation of duties between data providers, reviewers, and consolidators
- Spot checks and plausibility reviews at both subsidiary and group levels
- Cross-functional reviews by ESG domain leads
- Final review and approval of qualitative disclosures by responsible persons

Selected ESG data and reporting process were newly subject to external limited assurance by an independent third-party auditor in 2024.

4. Review and Approval Process

The draft ESG Report is reviewed by Elevion Group B.V. management. Following graphic and editorial adjustments, the report is submitted for approval by the Management Board. The final report is presented to the Supervisory Board.

5. Continuous Improvement and Risk Mitigation

Risks related to ESG reporting are mitigated through:

- Alignment with legal and ESRS structural requirements
- Engagement of qualified external consultants for complex or evolving areas

Post-assurance feedback will be systematically reviewed. Identified gaps, new ESRS requirements, and strategic sustainability priorities are incorporated into the subsequent reporting cycle. These are addressed through internal initiatives or with external expert support.

STRATEGY

DISCLOSURE REQUIREMENT SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

1. Business Model and Strategic Positioning

Elevion Group is a European leader in integrated energy solutions, operating across three core business pillars were mapped to ESRS topical standards and assessed for financial significance based on consolidated 2024 turnover (€1,274 million).

I. Building Energy Solutions:

Design & build services for technical building equipment, including HVAC, electrical installations, industrial automation, and maintenance contributing approximately 48% of total revenue.

II. Green Energy:

Renewable energy production & storage of such ground mounted and roof top PVs, biogas, biomethane and battery installation, energy management, and decarbonisation services tailored to support the energy transition contributing approximately 32% of total revenue.

III. Energy for Industry:

Energy-efficient solutions for industrial clients, including thermal energy systems and water treatment infrastructure. These mappings reflect the material impacts, risks, and opportunities identified in the double materiality assessment and support Elevion's strategic sustainability goals, contributing approximately 15% of total revenue.

For further detail on segment-level revenue thresholds and financial materiality, please refer to the IFRS 8 disclosures in the Elevion Group Annual Report 2024. These segments are aligned with the sustainability topics disclosed in this statement.

In addition to the three core business pillars, Elevion Group operates

several cross-functional activities with material impacts and intercompany revenues. These include:

- **Automation & Digital** (e.g. Hermos), active in designing digitalisation, automation and management customer solution.
- **Biogas and biomethane production**, with energy flows and strategic relevance to Scope 1 emissions.
- **Group-level holding services**, which generate intercompany revenues and support strategic execution. These activities are considered material due to their contribution to Elevion's decarbonisation strategy, innovation roadmap, and financial performance.

Biogas and biomethane production are included under Green Energy. Automation & Digital (e.g. Hermos) is included under Energy for Industry. Group-level holding services are reflected in the Central segment.

Our customer base includes:

- Industrial companies
- Energy suppliers
- Agricultural enterprises
- Municipalities
- Public sector
- Private households

In 2024, Elevion Group maintained a stable market and geographical footprint, with no significant changes in its business model or product portfolio.

Elevion Group's business model delivers tangible benefits for investors and other stakeholders. For investors, the Group's focus on energy efficiency, renewable energy, and ESG integration supports long-term value creation, regulatory resilience, and alignment with EU Taxonomy and CSRD requirements. For customers, Elevion provides tailored decarbonisation solutions that reduce energy costs and improve compliance. Employees benefit from a stable, innovation-driven environment, while municipalities and public authorities gain access to sustainable infrastructure and local job creation.

2. Strategic Sustainability Goals

Elevion Group has defined three strategic sustainability goals:

- **Support decarbonisation** across EU markets through advanced energy solutions
- **Embed ESG principles** across operations and governance
- **Achieve carbon neutrality**, including reduction of greenhouse gas emissions

These goals guide our investment priorities, innovation roadmap, and stakeholder engagement.

3. Resilience of Strategy and Business Model

The Group's business model is inherently aligned with the EU Green Deal and Fit-for-55 objectives. Our focus on energy efficiency, renewable energy, and decarbonisation positions us to benefit from:

- Regulatory incentives (e.g. EU taxonomy, national subsidies)
- Growing demand for sustainable infrastructure
- Rising energy prices and energy security concerns

Risks such as supply chain disruptions, regulatory shifts, or climate-related physical risks are mitigated through:

- Diversified supplier base
- Localised operations across 12 countries
- Continuous monitoring of ESG-related risks and opportunities

4. Value Chain Overview

a) Upstream:

Our key suppliers include manufacturers and service providers of HVAC systems, electrical components, renewable energy technologies, and construction materials. We prioritise suppliers that align with our sustainability standards and CO₂ reduction goals. Elevion Group secures its key inputs through a combination of direct procurement, long-term supplier partnerships, and internal development. Where feasible, materials and components are sourced locally to reduce transport-related emissions and support regional economies. For biogas and biomethane operations, agricultural residues and organic waste are reused within closed-loop systems, contributing to circularity. Software and automation solutions are developed in-house by subsidiaries such as Hermos. Supplier selection and input sourcing are governed by Elevion's Procurement Rules and Supplier Code of Conduct, which ensure transparency, ESG alignment, and compliance with CEZ Group standards.

b) Internal:

Elevion Group employs 5,525 people across Europe and beyond. Our employees are central to delivering high-quality, sustainable solutions. A detailed workforce breakdown is provided in section S1.

c) Downstream:

Our customers span multiple sectors and geographies. We deliver tailored energy solutions that help clients reduce emissions, improve efficiency, and comply with environmental regulations.

5. Excluded Sectors

Elevion Group does **not** operate in sectors such as:

- Fossil fuel extraction or processing
- Controversial weapons

Elevion Group does not engage in the production of chemicals or tobacco. However, certain subsidiaries provide services to clients

in these sectors. For example, Hermos develops track & trace automation solutions for the tobacco industry, and selected entities deliver energy efficiency or technical services to chemical manufacturers. These activities are limited in scope and do not represent core business operations. Elevion maintains strict compliance with ESG standards and ethical guidelines in all engagements. Elevion Group confirms that none of its products or services are banned or restricted in any of the markets where it operates. The Group does not engage in activities within sectors considered controversial or prohibited under applicable laws and regulations.

DISCLOSURE REQUIREMENT SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

1. Key Stakeholders

Elevion Group has identified the following key stakeholder groups relevant to its sustainability-related impacts, risks, and opportunities:

- **Customers**
- **Suppliers**
- **Employees**
- **Banks and financing institutions**
- **Shareholder (ČEZ, a.s.)**
- **Municipalities and public authorities**

These stakeholders are engaged based on their influence on, or exposure to, Elevion Group's operations and sustainability performance.

2. Stakeholder Engagement and Expectations

Stakeholder interests are primarily identified through long-standing relationships, contractual interactions, and targeted consultations. Key expectations include:

Stakeholder Group	Key Expectations
Customers	Reliable delivery, energy efficiency, decarbonisation support, transparent ESG reporting
Suppliers	Timely payments, clear ESG criteria in tenders, long-term cooperation
Employees	Stable employment, fair working conditions, training and development, workplace safety
Banks & Financing Partners	Financial stability, ESG strategy alignment, risk management, transparency
Shareholder (ČEZ, a.s.)	Strategic alignment with ČEZ Vision 2030, ESG performance, risk mitigation
Municipalities	Local job creation, environmental compliance, contribution to regional sustainability goals

3. Integration into Strategy and Governance

Stakeholder views are considered through:

- Regular management meetings and project reviews
- Annual supplier evaluations
- Customer feedback via contracts, portals, and service reviews
- Employee engagement
- Ongoing dialogue with financing partners and shareholder representatives

The **materiality assessment** incorporated stakeholder expectations where relevant data was available. These insights informed the prioritisation of sustainability topics and the development of Elevion Group's Strategic Sustainability Goals for 2030.

4. Governance Oversight

The Management Board of Elevion Group B.V. is regularly informed about stakeholder interests and concerns through:

- Quarterly business reviews
- ESG project updates
- Supervisory Board meetings

As of the reporting period, stakeholder input has not led to a formal change in the Group's strategy. However, Elevion Group plans to establish a **structured annual stakeholder dialogue process starting at the beginning of 2026** to enhance transparency and responsiveness.

DISCLOSURE REQUIREMENT SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Topic	Subtopic	IRO description	Location in the value chain
E1 Climate Change	Climate change adaptation	Actual Negative Impact Elevion Group has identified several material transitional risks such as regulatory and policy risks stem from exposure to evolving EU climate legislation, market and economic risks include volatility in energy prices, technology and innovation risks are also significant, reputational risks arise from rising stakeholder expectations and operational risks include the need for workforce reskilling and recruitment. Potential Positive Impact Elevion Group can work with suppliers to ensure that they have strategies in place to cope with the effects of climate change, which can affect the availability and price stability of raw materials. Risks Elevion Group's focus on E1 Climate Change and climate change adaptation involves reducing greenhouse gas emissions through increased use of renewable energy and enhanced energy efficiency, which also yields operational cost savings. Adaptation efforts bolster ecosystem protection and resource conservation, aligning with global sustainability goals. Financially, these initiatives not only mitigate risks associated with climate volatility, such as supply chain disruptions, but also position Elevion to benefit from regulatory incentives and enhance its competitive market stance. Furthermore, by prioritising resilient infrastructure and sustainable practices, Elevion improves community and employee well-being, increasing its attractiveness to investors and stakeholders looking for environmentally responsible companies. Overall, these strategies are integral to Elevion's long-term sustainability and operational stability. Opportunities By innovating adaptive solutions and technologies, Elevion can not only protect its operations from climate impacts but also position itself as a leader in the emerging market for climate resilience, expanding its customer base.	Both – own operations and value chain Whole Elevion Group
		Positive Actual Impact For Elevion Group, engaging in climate change mitigation entails actively reducing greenhouse gas emissions through various initiatives, such as transitioning to renewable energy sources and optimising energy efficiency. By doing so, Elevion helps to lessen its contribution to global warming while enhancing its operational efficiency and reducing dependency on non-renewable energy sources. Such measures not only lead to significant cost savings but also decrease the vulnerability of its operations to energy price volatility. Moreover, these actions align with global environmental standards, potentially lowering compliance costs and elevating Elevion's standing in markets increasingly favoring sustainable practices. The company's commitment to mitigating climate change also serves to attract environmentally-conscious investors and can foster goodwill within the communities it operates, further stabilising its business environment. Positive Potential Impact Actively working to measure and reduce the carbon footprint of the supply chain can help Elevion Group achieve carbon neutrality goals and respond to stakeholder demands for climate action.	Both – own operations and value chain Whole Elevion Group
		Positive Potential Impact Encouraging suppliers to adopt renewable energy sources for their production processes can significantly reduce the overall carbon footprint of the value chain.	Both – own operations and value chain
E3 Water and Marine Resources	Water	Actual Negative Impact Elevion Group's operations involve significant water usage, which contributes to pressure on local water resources, particularly in water-scarce regions. Additionally, water discharges from operations can negatively impact local ecosystems if not properly managed. Actual Negative Impact The group must manage water discharges to prevent contamination of local water bodies. This includes treating wastewater to meet regulatory standards, thereby reducing environmental impacts and avoiding penalties. Risks Elevated operational costs and regulatory penalties from excessive water use in water-scarce regions. Restrictions and increased costs due to regulatory limits on water withdrawals in drought-prone areas. Financial and reputational risks from non-compliance with wastewater discharge regulations.	Both – own operations and value chain Elevion division: Energy for Industry and operations in Italy

E5 Resource Use and Circular Economy	Resources inflows, including resource use	Actual Positive Impact By improving resource efficiency, Elevion can reduce costs and minimise its environmental footprint. Efficient resource use also shields the company from fluctuations in material costs and availability, which are increasingly relevant in a volatile global supply chain. Additionally, strategic resource management enhances Elevion's sustainability profile, attracting partnerships and customers keen on ecological responsibility, and aligning with global trends towards resource conservation.	Both – own operations and value chain All active markets
		Opportunities By optimising resource efficiency and incorporating renewable or recycled materials into its operations and products, Elevion can reduce costs, mitigate risks associated with resource scarcity, and enhance its competitive advantage.	
E5 Resource Use and Circular Economy	Resource outflows related to products and services and waste	Positive Actual Impact Elevion's initiatives aim to maximize the lifecycle value of the outputs from its services and products. This involves designing products and systems for longer use, ease of maintenance, and potential for recycling or repurposing at end-of-life. Such practices not only reduce the environmental impact associated with waste but also position Elevion as a leader in sustainable practices. This approach appeals to clients looking for sustainable solutions and helps Elevion comply with increasing regulatory demands focused on product lifecycle impacts.	Both - own operations and value chain All active markets
		Positive Actual Impact Elevion's focus is on minimising waste generation and enhancing waste management practices. Implementing robust recycling programmes and investing in technologies that enable the reuse of materials reflect a commitment to the circular economy. Such practices not only reduce the environmental burden but also generate cost savings from reduced waste handling and disposal fees. Moreover, they improve Elevion's compliance with environmental regulations and enhance its corporate reputation as an environmentally responsible company.	
S1 Own Workforce	Working conditions – Working time	Risk Excessive working hours can lead to employee burnout, reducing efficiency and increasing turnover rates.	Own operations
		Opportunity Implementing flexible schedules can improve work-life balance, boosting employee satisfaction and productivity Actual positive impact Regarding working time, Elevion upholds fair labour practices that respect the balance between work and personal life, thus enhancing job satisfaction and employee wellness.	
S1 Own Workforce	Working conditions – Health and safety	Risk Inadequate safety measures can result in injuries and financial liabilities.	Own operations
		Opportunity Prioritising health and safety can reduce accidents, lower insurance costs, and improve productivity Actual positive impact Health and safety are paramount, with rigorous standards and ongoing initiatives aimed at ensuring a safe working environment, thus minimising workplace risks and enhancing employee wellbeing.	
S1 Own Workforce	Equal treatment and opportunities for all – Gender equality and equal pay for work of equal value	Risk Non-compliance with equality standards can lead to legal challenges and harm corporate image.	Own operations
		Opportunity Promoting diversity and equal opportunities can enhance creativity, problem-solving, and market understanding. Actual positive impact In terms of equal treatment and opportunities, Elevion champions gender equality and equal pay for work of equal value, ensuring that all employees have equal access to opportunities and resources, irrespective of gender.	
S1 Own Workforce	Equal treatment and opportunities for all – Training and skills development	Risk Without ongoing training, employee skills may become outdated, impacting Elevion's ability to stay competitive and innovate.	Own operations
		Opportunity Investing in continuous training and development helps maintain a highly skilled workforce, driving innovation and keeping the company competitive in rapidly evolving industries. Actual positive impact The company invests in training and skills development to enhance the competencies of its workforce, supporting career progression and adapting to industry changes.	

S1 Own Workforce	Equal treatment and opportunities for all – Diversity	Risk Inadequate management of a diverse workforce can lead to conflicts and misunderstandings, affecting team cohesion and performance. Opportunity A well-managed diverse workforce can offer a wider range of perspectives and ideas, leading to better decision-making, increased innovation, and deeper insights into customer needs across different markets. Actual positive impact Diversity within the workforce is celebrated, contributing to a rich corporate culture that drives innovation and reflective decision-making.	Own operations
S2 Workers in the Value Chain	Working conditions – Secure employment	Risk Insecurity in employment within the value chain can lead to high turnover, affecting productivity and quality. Opportunity Promoting secure employment can stabilise the workforce, enhancing productivity and reliability in the supply chain. Actual Positive impact Elevion Group extends its commitment to fair and equitable working conditions beyond its immediate employees to include workers throughout its value chain. This commitment influences various facets of labour practices, ensuring that working time across the value chain is regulated to maintain balance and health, thus fostering a sustainable work environment conducive to high productivity and well-being.	Both - own operations and value chain
S2 Workers in the Value Chain	Working conditions – Adequate wages	Risk Inadequate wages can result in low morale and high employee turnover. Opportunity Fair wages ensure high worker satisfaction, leading to better retention rates and productivity. Actual Positive Impact Elevion ensures that adequate wages are paid not only within its own operations but also among its suppliers and partners, advocating for fair compensation that meets or exceeds local and industry standards. This practice helps in attracting and retaining a motivated workforce throughout the value chain.	Both - own operations and value chain
S2 Workers in the Value Chain	Working conditions – Social Dialogue	Risk Poor communication can lead to misunderstandings and disputes, disrupting operations. Opportunity Effective social dialogue can foster a cooperative environment and streamline problem resolution. Actual Positive Impact The company promotes social dialogue at all levels of its supply chain, facilitating a platform for open communication between workers and management, which is crucial for addressing grievances and fostering a collaborative work environment.	Both – own operations and value chain
S2 Workers in the Value Chain	Working conditions – Freedom of association, including the existence of work councils	Risk Restrictions on workers' rights can lead to legal challenges and reputational damage. Both risk and opportunity Supporting workers' rights to organise can lead to a more engaged and productive workforce. Actual Positive Impact Freedom of association is staunchly supported, with Elevion encouraging its suppliers to recognise the right of workers to organise and join unions or workers councils.	Both – own operations and value chain
S2 Workers in the Value Chain	Working conditions – Work-life balance	Opportunity Promoting work-life balance enhances employee well-being and reduces turnover. Actual Positive Impact Work-life balance is prioritised to enhance employee satisfaction and productivity within the value chain.	Whole value chain
S2 Workers in the Value Chain	Working conditions – Health and safety	Risk Inadequate safety measures can result in accidents and subsequent legal and financial repercussions. Opportunity Robust health and safety standards minimise risks and enhance the company's reputation as a responsible entity. Actual Positive Impact Elevion advocates for health and safety standards that exceed the minimum legal requirements, ensuring that all workers operate in a safe and healthy work environment, which is critical in minimising accidents and health-related absences.	Whole value chain

S2 Workers in the Value Chain	Equal treatment and opportunities for all – Training and skills development	Opportunity Effective training programmes enhance worker skills, leading to improved productivity and fostering innovation within the supply chain.	Whole value chain
		Actual Positive Impact The company supports initiatives that provide training and skills development to workers in its value chain, enhancing their career prospects and adapting to industry changes.	
S4 Consumers and End-users	Personal safety of consumers and/or end-users – Health and safety	Actual Positive Impact Elevion prioritises the health and safety of its consumers by adhering to strict safety standards in the design, manufacture, and distribution of its products. Regular safety audits and compliance checks ensure that all products are safe for use, minimising the risk of harm to consumers.	Own operations – specific site
G1 Business conduct	Corporate culture	Actual Positive Impact Elevion Group cultivates a corporate culture that emphasizes integrity, responsibility, and sustainability. This culture is integral to the company's identity and guides the behaviour of its workforce. It ensures that business decisions are in line with ethical standards, internal compliance regulations and legal requirements and support long-term goals. This promotes a positive work environment and strengthens stakeholder trust.	Whole value chain Elevion Group
G1 Business conduct	Management of relationships with suppliers including payment practices	Opportunity Strong, ethical supplier relationships ensure a stable supply chain and can lead to innovations and cost savings through collaborative partnerships.	Whole value chain
G1 Business conduct	Protection of whistle-blowers	Actual Positive Impact In accordance with the Whistleblower Protection Act, Elevion Group is committed to protecting whistle-blowers, ensuring that they can report unethical behaviour anonymously without fear of retaliation. By safeguarding whistle-blowers, Elevion promotes transparency and accountability within its operations, enhancing its ability to detect and address misconduct effectively.	Both – own operations and value chain Specific subsidiary: Germany
G1 Business conduct	Corruption and bribery – Prevention and detection including training	Opportunity Comprehensive anti-corruption training and effective detection mechanisms uphold high standards of integrity, fostering trust among stakeholders and reducing operational risks.	Whole value chain
G1 Business conduct	Corruption and bribery – Incidents	Opportunity Effectively managing and resolving corruption incidents can demonstrate the company's commitment to ethical practices, restoring trust and potentially strengthening resilience and governance practices.	Whole value chain

DISCLOSURES ON THE MATERIALITY ASSESSMENT PROCESS

DISCLOSURE REQUIREMENT IRO-1 – DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

In 2024, Elevion Group B.V. conducted its first **Double Materiality Assessment (DMA)** in alignment with **Corporate Sustainability Reporting Directive (CSRD)**. The objective was to identify and prioritise the most significant sustainability-related **impacts, risks, and opportunities (IROs)** across Elevion’s operations and value chain.

1. Methodological Framework

The DMA was guided by:

- ESRS 1 and ESRS 2 cross-cutting standards
- EFRAG’s draft guidance on materiality assessment (October 2023)
- Elevion Group’s internal risk management framework
- Sector-specific benchmarks and peer comparisons
- Sustainability priorities of the parent company, ČEZ a.s.

2. Scope and Value Chain Coverage

The assessment covered:

- All **fully consolidated entities** of Elevion Group B.V.
- Key **upstream and downstream value chain actors**, including major suppliers and customers

Due to current data limitations, full value chain coverage has not yet been achieved. Elevion is committed to progressively expanding this scope in future reporting cycles.

3. Identification and Evaluation of IROs

A cross-functional team of internal experts, supported by external ESG advisors, conducted a structured evaluation of IROs across all relevant ESRS topics. The process included:

- Mapping IROs to **own operations, upstream, and downstream** activities
- Classifying each IRO as an **impact, risk, or opportunity**
- Assessing **impact materiality** using:
 - **Scale** (severity of the impact)
 - **Scope** (extent of affected stakeholders or ecosystems)
 - **Irremediability** (difficulty of reversing the impact)
 - **Likelihood** (probability of occurrence)
- Assessing **financial materiality** using:
 - **Magnitude of potential financial effect** (on turnover, costs, or asset values)
 - **Likelihood of occurrence**

Each IRO was scored on a 5-point scale per criterion. A **composite score** was calculated using a weighted formula. Topics scoring **12 or higher (out of 25)** were classified as **material**. In total, **58 material topics** were identified across environmental, social, and governance domains.

	Positive impact
	Negative impact
	Risk
	Opportunity



UPSTREAM

OWN OPERATIONS

DOWNSTREAM

● ●	Climate change adaptation	
●	Climate change mitigation	
●	Energy	
● ●	Water	
● ●	Resources inflows, including resource use	
● ●	Resource outflows related to products and services and waste	
	● ● ● Working conditions – Working time ● ● ● Working conditions – Health and safety ● ● ● Equal treatment and opportunities for all – Gender equality and equal pay for work of equal value ● ● ● Equal treatment and opportunities for all – Training and skills development ● ● ● Equal treatment and opportunities for all – Diversity	
● ● ●	Working conditions – Secure employment	
● ● ●	Working conditions – Adequate wages	
● ● ●	Working conditions – Social Dialogue	
● ● ●	Working conditions – Freedom of association, including the existence of work councils	
● ●	Working conditions – Work-life balance	
● ● ●	Working conditions – Health and safety	
● ●	Equal treatment and opportunities for all – Training and skills development	
●	Personal safety of consumers and/or end-users – Health and safety	
●	Corporate culture	
●	Management of relationships with suppliers including payment practices	
●	Protection of whistle-blowers	
●	Corruption and bribery – Prevention and detection including training	
●	Corruption and bribery – Incidents	



4. Governance and Validation

The DMA process was coordinated by the group ESG Manager and validated by:

- Paulína Friedová (Head of Group Marketing & ESG)
- Jiří Pecka (CFO)
- Michal Janda (CCO)

Final approval was granted by Jaroslav Macek (CEO). The results directly informed the disclosures under **SBM-3** and the formulation of **Elevion Group's Strategic Sustainability Goals for 2030**.

5. Time Horizons and Financial Effects

Material IROs were assessed across three time horizons: **short-term**, **medium-term**, and **long-term**. While precise financial quantification is still under development, Elevion is enhancing its internal processes to assess the **anticipated financial effects** of material IROs, in line with ESRS topical standards (e.g. E1-9, E3-5, E5-6). This includes scenario analysis, cost-benefit assessments, and integration with strategic planning and risk management.

6. Continuous Improvement

As 2024 marks Elevion Group's first CSRD-aligned reporting year, the DMA process will be refined frequently to reflect:

- Evolving regulatory requirements
- Stakeholder feedback
- Strategic developments and emerging sustainability trends

Planned improvements include:

- Enhanced data collection from suppliers and customers
- Integration of the DMA into the Group's enterprise risk management system
- Expansion of value chain coverage and financial quantification of IROs

DISCLOSURE REQUIREMENT IRO-2 – DISCLOSURE REQUIREMENTS IN ESRS COVERED BY THE UNDERTAKING'S SUSTAINABILITY STATEMENT

Note: Table of all the datapoints that derive from other EU legislation is listed in Appendix A of this report.

ENVIRONMENT



EU TAXONOMY

ENVIRONMENT





ARTICLE 8 TAXONOMY REGULATION

The Taxonomy Regulation is a key component of the European Commission’s action plan to redirect capital flows towards a more sustainable economy. It represents an important step towards achieving carbon neutrality by 2050 in line with EU goals as the Taxonomy is a classification system for environmentally sustainable economic activities.

In the following section, we as a non-financial parent undertaking present the share of our group turnover, capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting period 2024, which are associated with economic activities assessed under all six environmental objectives, including Taxonomy-aligned activities for climate change mitigation and adaptation, and Taxonomy-eligible activities for the remaining objectives.

For the purposes of this report, the following Delegated Acts supplementing the Taxonomy Regulation are referenced:

- Commission Delegated Regulation (EU) 2021/2139 establishing technical screening criteria for climate change mitigation and adaptation (hereinafter referred to as the Climate Delegated Act),
- Commission Delegated Regulation (EU) 2023/2486 establishing criteria for the remaining four environmental objectives (hereinafter referred to as the Environmental Delegated Act.)

OUR ACTIVITIES

Overview

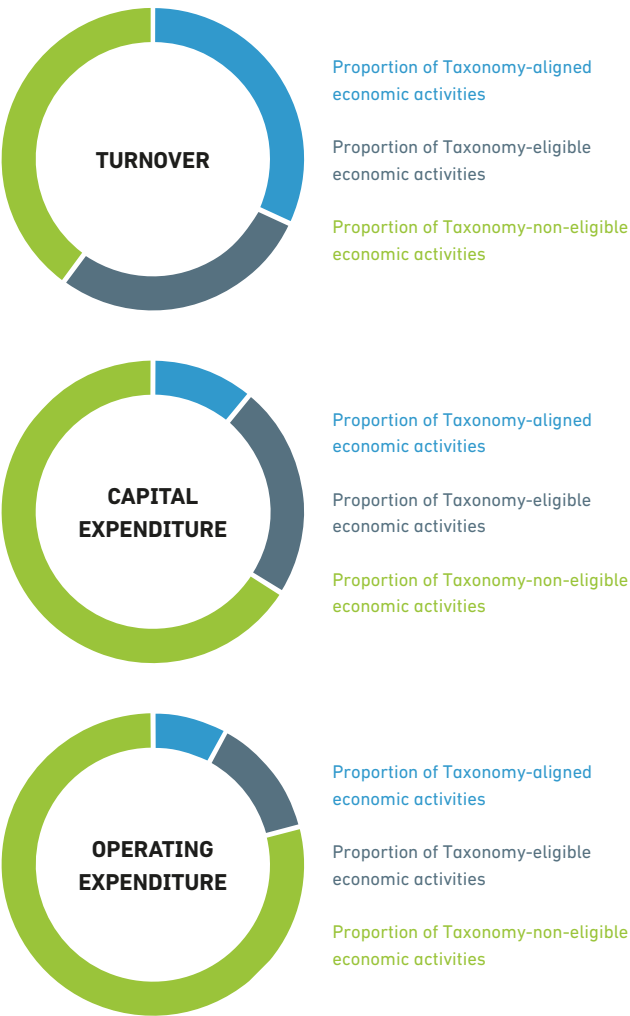


Table 1 – Proportion of Taxonomy-eligible, Taxonomy-aligned and Taxonomy-non-eligible economic activities in total turnover, CAPEX and OPEX in FY 2024

	Total (tEUR)	Proportion of Taxonomy-aligned economic activities	Proportion of Taxonomy-eligible economic activities	Proportion of Taxonomy-non-eligible economic activities
Turnover	1 274 433	32 %	28 %	40 %
Capital expenditure (CAPEX)	70 465	11 %	23 %	66 %
Operating expenditure (OPEX)	12 608	9 %	14 %	77 %

Definitions

Taxonomy-eligible economic activity means an economic activity that is described in the delegated acts supplementing the Taxonomy Regulation (i.e. the Climate Delegated Act and Environmental Delegated Act) irrespective of whether that economic activity meets any or all of the technical screening criteria laid down in those delegated acts.

An economic activity is Taxonomy-aligned where it complies with the technical screening criteria as defined in the Climate Delegated Act and the Environmental Delegated Act, and it is carried out in compliance with the minimum safeguards regarding human and consumer rights, anti-corruption and bribery, taxation, and fair competition. To meet the technical screening criteria, an economic activity contributes substantially to one or more environmental objectives while not doing significant harm to any of the other environmental objectives.

Taxonomy-non-eligible economic activity means any economic activity that is not described in the delegated acts supplementing the Taxonomy Regulation.

TAXONOMY-ELIGIBLE AND TAXONOMY-ALIGNED ECONOMIC ACTIVITIES

We have examined all economic activities carried out by the Group to see which of these are eligible and also aligned in accordance with all annexes of the relevant delegated acts. The KPI templates below (see Appendix 4: EU Taxonomy Key Performance Indicators) provide, aside from other, a clear indication of which environmental objective is pursued by the respective activity. Our activities are, by their nature, primarily oriented towards climate change mitigation and therefore we allocate all our activities to the Climate change mitigation environmental objective.

Table 2 – Taxonomy-eligible economic activities

Economic activity	Description
CCM 3.5 Manufacture of energy efficiency equipment for buildings	Manufacturing of own compact heat exchangers in different variants and power units.
CCM 4.1 Electricity generation using solar photovoltaic technology	Build and operate own PV power plants. PPA-contracts (power purchase agreement) a long-term contract between an electricity generator and a customer, usually a utility, government, or company.
CCM 4.10 Storage of electricity	Delivering and operating a battery storage solution in the B2B sector or for a municipality.
CCM 4.20 Electricity and heat generation - biomass and biogas	Operation in a cogeneration system, reusing heat from the plant for heating the digester and for the domestic heating of houses adjacent to the farm, through a district heating network. Design of the plant upgrade to produce biomethane.
CCM 4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	Construction and operation of high-efficiency co-generation, services related to monitoring and optimising the performance of co-generation plants. Services related to optimising co-generation plants to achieve maximum energy efficiency and minimal waste. Solutions for the design, construction, and implementation of co-generation plants that utilise gaseous fossil fuels efficiently.
WTR 5.1 Construction, extension and operation of water collection, treatment and supply systems	Construction of water treatment plants, installation of water tanks for clean water.
WTR/CCM 5.3 Construction, extension and operation of waste water collection and treatment	Providing solutions related to water supply plants in the field of drinking water and water treatment together with the necessary infrastructure (water and sewage networks and general construction works), systems for filtration and chemical treatment and disinfection of water, construction and modernisation of deep wells.
CCM 6.5 Transport by motorbikes, passenger cars and light commercial vehicles	Purchase or lease of electric vehicles for own operations of the companies.
CCM 7.3 Installation, maintenance and repair of energy efficiency equipment	Construction and operation of efficient technical solutions in various fields, including energy efficiency, HVAC, heat pumps, CHP, or sustainable technologies. Services in various areas including automation, control systems, or industrial solutions.
CCM 7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	Providing of turnkey solutions for the e-Mobility (consulting, sale, project planning and design, installation and maintenance of vehicle charging infrastructure)
CCM 7.5 Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	Expertise that consists of engineering, switchgear manufacturing, software for automation and IT systems, product development and after-sales service.
CCM 7.6 Installation, maintenance and repair of renewable energy technologies	Development, construction, and operation of utility-scale solar power plants, solar panels installations, energy storage and ongoing maintenance and repair services including systems.
CCM 8.2 Data-driven solutions for GHG emissions reductions	Development of the IT solutions supporting the ESCO activities of the Group, such as an integrated B2B platform for energy products ensuring digitalisation of all activities along the entire value chain; development of energy management software and software for customised industrial and environmental automations
CCM 9.3 Professional services related to energy performance of buildings	Consulting services and project management regarding heat and energy technology, offering solutions related to heating systems, energy efficiency, sustainable energy technologies and contracting. In addition, consulting and engineering services in other fields, such as civil engineering, structural engineering, or environmental engineering. Energy-related projects, such as renewable energy systems, energy efficiency, or power generation. Sustainability consulting.

Note: Activity 5.3 was assessed under both the Climate Delegated Act and the Environmental Delegated Act, as they contribute to multiple environmental objectives but are fully subsumed under the CCM objective. This dual assessment is reflected in the coding (e.g. CCM/WTR) and ensures full compliance with the EU Taxonomy framework.

Relevant judgement on the Taxonomy-eligibility of our activities

The activities identified as taxonomy-eligible were identified based on examining the substance of each activity, substantial contribution of the activity for climate change mitigation objective and its compliance with the description of the particular activity according to the annexes to the Climate Delegated Act and Environmental Delegated Act.

Taxonomy-non-eligible activities

The activities identified as taxonomy non-eligible according to the analysis within the Group were classified in several business elements. The material identified non-eligible activities are additional supporting services in the energy sector and corporate services at holding entities of the Group provided to the other group members.

ASSESSMENT OF TAXONOMY–ALIGNMENT

Substantial contribution

In order to determine if an economic activity is Taxonomy-aligned, it must first comply with the first requirement as described in the

Taxonomy Regulation – it must contribute substantially to one or more of the environmental objectives. All turnover-generating activities aim at a substantial contribution to climate change mitigation. In order to contribute to an environmental objective, an activity must meet specific technical screening criteria stated for that activity within the relevant Appendix to the delegated act. We comment below on these criteria and how they have been assessed. Activity CCM 3.5 contributes to climate change mitigation by the production of own compact heat changers and power units.

Activity CCM 4.1 is substantially contributing to climate change mitigation through the generation of electricity using solar photovoltaic technology.

Activity CCM 4.10 is connected with delivering and operating battery energy storage systems (BESS) which substantially contribute to climate change mitigation.

Activity CCM 4.20 includes constructions and operations of cogeneration units using certified biomass bringing savings from the use of biomass in cogeneration installations of at least 80 % savings in relation to the GHG emission saving methodology and fossil fuel comparator.

Activity CCM 5.3 supports climate change mitigation by designing, constructing, and modernising water and sewage networks, systems

for the filtration, chemical treatment, and disinfection of the water. Activity CCM 7.3 is substantially contributing to climate change mitigation by the installation of energy efficient technical solutions for the buildings, such as HVAC, heat pumps, CHPs, or other sustainable technologies.

Activity CCM 7.5 combine the installation and maintenance of instruments and devices for measuring, regulating, and controlling the energy performance of buildings primarily consisting of zoned and smart thermostat systems and business energy management systems.

Activity CCM 7.6 carries a substantial contribution to climate change mitigation through the installation and maintenance of technical building systems such as solar photovoltaic systems.

Activity CCM 9.3 is delivered as professional services related to the energy performance of buildings primarily consisting of energy services provided by energy service companies.

Do no significant harm (DNSH)

DNSH to climate change adaptation

For all of our activities contributing to climate change mitigation, a physical climate risk assessment is needed pursuant to Appendix A to the Climate Delegated Act. This climate risk analysis was conducted by ČEZ Group and is applicable across all entities within the Elevion Group.

For each of the sites, a preliminary screening of the climate-related risks and hazards as mapped in Appendix A was conducted, and those risks that were found to be relevant were further analysed in a climate risk assessment.

Detailed climate risk methodology and group-wide assessments are described in Chapter E1. In this section, we focus exclusively on risks relevant to the EU Taxonomy and limited to aligned activities. For each aligned activity, we assessed whether material physical climate risks were identified and confirmed that appropriate adaptation measures are in place.

DNSH to sustainable use and protection of water and marine resources

Activity CCM 3.5

The manufacturing activities reported as aligned and contributing to CCM 3.5 comply with all the valid legislative requirements necessary at the national and EU level related to the protection of water and marine sources as well as internal directives implemented at the group level. Additionally, a closed water circuit has been introduced at the pressure test bench in the manufacturing facilities in Poland in 2024 which leads to further water savings.

Activity CCM 4.10

The installed battery energy storage system contributing to CCM 4.10 complies with all EU and national regulations related to the protection of water and marine sources such as construction and operational permits, environmental impact assessment (EIA), or similar alternative regulations in case EIA was not legislatively required at the time of construction.

Activity CCM 4.20

Production facilities are located in the EU, therefore they comply with all legally binding requirements regarding the protection of water and marine sources such as construction permits. In case of any national or EU legislation requirements, environmental impact assessments or similar alternative assessments have been successfully passed, including an assessment of the impact on water.

Activity CCM 5.3

The Group's projects and installations related to CCM 5.3 comply with all the legislative requirements necessary at the national and EU level related to the protection of water and marine sources, such as construction or operating permits. The environmental impact assessment or similar alternative assessment, including an assessment of the impact on water, is available in case of legislative requirement.

Activity CCM 4.1, CCM 7.3, CCM 7.5, CCM 7.6 and CCM 9.3

No criteria set by EU Taxonomy.

DNSH to transition to circular economy

Activity CCM 3.5

The Elevion Group is continuously assessing the availability and feasibility of using equipment and components of high durability, recoverability and recyclability that are easy to dismantle and refurbish.

The facility related to the manufacturing of energy efficiency equipment and reported as aligned activity CCM 3.5 is seated in the European Union and, therefore, it complies with the mandatory requirements for obtaining valid permits. Additionally, the company also obtained certificates 9001, 14001, 45001 and 3834-2 and fully supports the group-level internal directives, which generally stand on the basic principles of UN Sustainable Development Goals such as Elevion Group Sustainable Procurement policy supporting the principles of circularity, recyclability and traceability of substances of concern throughout the lifecycle of the manufactured products.

Activity CCM 4.1

The Elevion Group is continuously assessing the availability and feasibility of using equipment and components of high durability, recoverability and recyclability that are easy to dismantle and refurbish.

This assessment is constituted on group-level internal directives, which generally stand on the basic principles of UN Sustainable Development Goals such as Elevion Group Sustainable Procurement policy.

Activity CCM 4.10

The installed solutions related to CCM 4.10 support waste management principles maximising reuse and recyclability. The projects comply with all the mandatory legislative requirements necessary at the national and EU level related to waste management, such as operating permits.

Additionally, circularity principles are guided by internal group-level directives, including the Elevion Group Sustainable Procurement Policy supporting the core principles of the UN Sustainable Development Goals.

DNSH to transition to circular economy

Activity CCM 4.20, CCM 5.3, CCM 7.3, CCM 7.5, CCM 7.6 and CCM 9.3 – No criteria set by EU Taxonomy.

DNSH to pollution prevention and control

Activity CCM 3.5

As the production facility is located in the EU, it complies with all legally binding requirements regarding pollution prevention and use of chemical substances. The manufacturing plant complies with the mandatory rules for regulated substances and no breaches with those rules were identified, which can be confirmed by reports

from national Environmental Protection Inspectorate and similar certificates.

Activity CCM 5.3

The projects contributing to CCM 5.3 and reported as aligned to this activity have implemented – when relevant – appropriate measures to avoid and mitigate excessive storm water overflows from the waste water collection system, such as nature-based solutions, separate storm water collection systems, retention tanks and treatment of the first flush. In case the discharged wastewater and sludge were part of the reported project, the delivered solutions comply with emission limits according to valid national and EU permits and no substantial breach occurred during the reporting period.

Activity CCM 7.3

The installed projects contributing to CCM 7.3, which were reported as aligned, comply with EU regulations addressing regulated substances, chemical compounds, and substances of concern and no breach of law was convicted during the reporting period.

Activity CCM 4.20

All facilities are located in the European Union and, therefore, they comply with the mandatory requirements for obtaining valid permits, ensuring compliance with water authority regulations, pollution emission limits, and air quality plans. The plants fulfil the criteria of Environmental Impact Assessment when legislatively required. Activity CCM 4.1, CCM 4.10, CCM 7.5, CCM 7.6, CCM 9.3
No criteria set by EU Taxonomy.

DNSH to the protection and restoration of biodiversity and ecosystems

Activity 3.5

The manufacturing facility is located in the EU and, therefore, it complies with the EIA conditions, or similar valid permit procedure for the given site including biodiversity assessment, if the EIA was not legislatively required at the time of construction.

Activity CCM 4.1

All installed and/or operated photovoltaic solutions follow the conditions of Environmental Impact Assessment, or similar valid permit procedure including the aspect of biodiversity for the given site in cases, when EIA was not legislatively required at the time of construction.

The photovoltaic systems installed and operated on an existing building were subject to valid building permits received from local governments; therefore, it complies with all legally binding requirements.

The ground-mounted PV plants usually undergo an environmental permit phase before construction. The outcome of the assessment can also be individual compensation measures to be realised and checked by environmental authorities.

Activity CCM 4.10

The installations contributing to CCM 4.10 were delivered within the area of the EU and, therefore, they follow EIA conditions, or similar valid permit procedures for the given site – including a biodiversity assessment – if the EIA was not legislatively required (usually due to the smaller capacity of the installed solution). This is also supported by the environmental subsidy approved by the national authorities.

Activity CCM 4.20

Production facilities are located in the EU and have all been subject to an environmental impact assessment and have successfully passed the assessment, including a biodiversity assessment when required by the national or EU authorities.

Activity CCM 5.3

The solutions, projects, and installations contributing to CCM 5.3 and reported as aligned, follow EIA conditions, or similar valid permit procedures for the given site – including a biodiversity assessment – if the EIA is not legislatively required.

Activity CCM 7.3, CCM 7.4, CCM 7.5, CCM 7.6 and CCM 9.3

No criteria set by EU Taxonomy.

Minimum Safeguards

The final step to Taxonomy-alignment is compliance with the minimum safeguards (MS). The MS include all procedures implemented to ensure that economic activities are carried out in alignment with:

- the OECD Guidelines for Multinational Enterprises (OECD MNE Guidelines);
- the UN Guiding Principles on Business and Human Rights (UNGPs), including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work; and

The scope of the MS covers the following four topics:

- human rights (including labour and consumer rights);
- corruption and bribery;
- taxation; and
- fair competition.

We follow a two-dimensional assessment approach to assess compliance with MS. On the one hand, adequate processes have been implemented to prevent negative impacts (procedural dimension). On the other hand, outcomes are monitored to check whether our processes are effective (outcome dimension).

Elevion Group is fully confident about compliance with MS in 2024 as we conduct our business in accordance with human rights and ethical principles. We fully embrace the fundamental international conventions and declarations of human and labour rights and take them into full consideration when developing ethical commitments and rules.

To ensure a consistent ethical framework, we have adopted a comprehensive Code of Conduct, which applies to all subsidiaries across the Group. The Code of Conduct sets out the fundamental principles of ethical behaviour, compliance with applicable laws, and adherence to international human rights, labour, anti-corruption, and competition standards. All employees, including those in governance bodies, are required to familiarise themselves with the Code upon joining the company and to participate in regular training.

Human rights

(including labour and consumer rights)

All the companies within the Elevion Group fully comply with all local and European legislation, regulations, and laws regarding child and forced labour. No cases of violations were identified in 2024. Any person who feels that their human rights have been violated by the activities of Elevion Group or an actor in our supply chain can report the issue anonymously through our whistleblowing platform that is published on our website. We are fully compliant

with EU Directive 2019/1937 on the protection of persons who report breaches of Union law.

Corruption and bribery

Elevion Group maintains a zero-tolerance stance towards any form of corruption or bribery. This includes both offering and accepting bribes. To prevent and fight against corrupt practices, Elevion Group implemented an anti-corruption programme. The principles of anti-corruption are covered in the Code of Conduct and Anti-Corruption Policy. Furthermore, employees of Elevion Group undergo compliance training on an annual basis that also contains topics of anti-corruption.

Elevion Group has established a clear reporting mechanism for employees to anonymously report any suspected cases of corruption or bribery through our whistleblowing link. These reports are taken seriously and investigated thoroughly.

Additionally, we have published a Supplier Code of Conduct (Commitment to ethical obligations) that is available on our website and is being actively communicated to our customers and business partners.

Taxation

In line with our ethical business values, tax governance and tax compliance are important elements of our oversight, and we are committed to complying with all relevant tax laws and regulations. Therefore, in line with the publicly available Group's strategy, our tax strategy is transparent, sustainable in the long term, and publicly available. Elevion Group adheres to the highest professional standards and integrity when preparing and filing tax returns. We ensure all tax disclosures are made in accordance with local requirements and the applicable IFRS framework. Tax risk management is an essential component of our compliance management system and is embedded in our overall company risk management system (see our Annual Financial Report 2024). Our risk-based tax governance framework is managed by a team of dedicated, qualified tax experts, who work closely with our Group management.

Fair competition

We carry out our activities in a manner consistent with all applicable competition laws and regulations, taking into account the competition laws of all jurisdictions in which our activities might have anti-competitive effects. This ensures a level playing field and promotes healthy competition. The group upholds high ethical standards in all business dealings. This includes avoiding any anti-competitive practices such as price-fixing, market allocation, or abuse of a dominant position. All employees, including those in managerial positions, undergo regular training on the Group's Code of Conduct, which also covers fair competition and ethical business conduct. This training provides practical guidance to help employees prevent, detect, and address potential competition law violations. By focusing on sustainable and innovative solutions, Elevion Group aims to compete fairly while contributing positively to the environment and society.

OUR KPIS AND ACCOUNTING POLICIES

The key performance indicators ("KPIs") include the turnover KPI, the CAPEX KPI and the OPEX KPI. For presenting the Taxonomy KPIs, we use the templates provided in Annex II to the Disclosures Delegated Act. As we are performing activities related to natural gas, we are also using the dedicated templates introduced by the

Complementary Delegated Act as regards activities in certain energy sectors.

Process for data collection and validation

Several communication channels with taxonomy and technical experts were established within the Elevion group to institute a qualified and standardised assessment and interpretation of data in compliance with EU taxonomy requirements. A Data collection process was set up as a combination of financial reporting of particularly defined KPIs and internal reporting solutions for collecting non-financial data with a dedicated taxonomy module. This ensured data collection assessment for each business activity within fully consolidated subsidiaries.

Though the EU Taxonomy reporting is a voluntary assessment for the Elevion Group, we continuously improve the data collection process through regular group-wide trainings and capacity-building sessions for dedicated personnel, organised either by Elevion or in cooperation with ČEZ Group.

The specification of KPIs is determined in accordance with Annex I to the Disclosures Delegated Act. We determine the Taxonomy-aligned KPIs in accordance with the legal requirements and describe our accounting policy in this regard as follows:

TURNOVER KPI

Definition

The proportion of Taxonomy-aligned economic activities in our total turnover has been calculated as that part of net turnover derived from products and services associated with Taxonomy-aligned economic activities (numerator) divided by the net turnover (denominator), in each case for the financial year from 1. 1. 2024 to 31. 12. 2024.

The denominator of the turnover KPI is based on our consolidated net turnover in accordance with paragraph 82(a) of IAS 1. For further details on our accounting policies regarding our consolidated net turnover, see chapter **Consolidated income statement for the year ended on 31 Dec. 2024** of our Annual Financial Report 2024. The numerator of the turnover KPI is defined as the net turnover derived from products and services associated with Taxonomy-aligned activities, that is:

- Activity 3.5 "Manufacture of energy efficiency equipment for buildings" generates net turnover from producing own compact heat exchangers in different variants.
- Activity 4.1 "Electricity generation – solar energy" generates net turnover from operating own photovoltaic power plants and installing ground-mounted photovoltaic systems for customers.
- Activity 4.10 "Storage of electricity" generates net turnover from delivering and operating a battery storage solution in B2B sector or for municipality.
- Activity 4.20 "Electricity and heat generation – biomass and biogas" generates net turnover from operating biogas plants using biomass as primary source for heating and/or electricity production.
- Activity 5.3 "Construction, extension and operation of wastewater collection and treatment" generates net turnover from designing and general construction works related to the water and sewage water infrastructure, systems for filtration and chemical treatment and disinfection of water.
- Activity 7.3 "Installation, maintenance and repair of energy efficiency equipment" generates net turnover from construction and installation of efficient technical solutions in various

fields, including energy efficiency, HVAC, heat pumps, CHP, or sustainable technologies. Those technologies are delivered as part of general building reconstruction as well as new building developments.

- Activity 7.5 “Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings” generates net turnover from switchgear manufacturing, software for automation and IT systems’ development and installation
- Activity 7.6 “Installation, maintenance and repair of renewable energy technologies” generates net turnover from design, installation, operation and maintenance of utility-scale solar power plants.,
- Activity 9.3 “Professional services related to energy performance of buildings” generates net turnover from consultancy services and project management regarding various energy efficient solutions for buildings.

Reconciliation

Our consolidated net turnover can be reconciled to our consolidated financial statements, see the chapter **Consolidated income statement for the year ended on 31 Dec. 2024** of our Annual Financial Report 2024, first row.

Further explanations

The allocation of Turnover KPI is primarily driven by a particular business activity of the company which complies with the substance of the particular taxonomy-defined activity. When the characteristic of the business activity enables allocation per delivered projects, the revenues from the projects contributing to the particular EU Taxonomy activity were allocated accordingly.

In such cases when the complexity of the project does not enable unequivocal identification of its contribution to the taxonomy activity, the allocation of the turnover was processed according to the most suitable driver.

Double counting of economic activities was avoided during the KPI calculations, in line with the requirements of the Disclosures Delegated Act

CAPEX KPI

Definition

The CAPEX KPI is defined as Taxonomy-aligned CAPEX (numerator) divided by our total CAPEX (denominator).

Total CAPEX includes additions to tangible and intangible fixed assets during the financial year, prior to depreciation, amortisation, and any re-measurements (e.g. revaluations or impairments), and excludes changes in fair value. It comprises:

- Acquisitions of tangible fixed assets (IAS 16)
- Intangible assets (IAS 38)
- Right-of-use assets (IFRS 16)
- Investment properties (IAS 40)
- Additions resulting from business combinations

Goodwill is excluded, as it is not defined as an intangible asset under IAS 38.

For further details on our accounting policies, refer to:

- Chapter 2.8: Property, Plant and Equipment
- Chapter 2.9: Intangible Assets including R&D
- Chapter 2.12: Leases in our Annual Report 2024.

The numerator consists of the following categories of Taxonomy-aligned CAPEX:

a) CAPEX related to assets or processes associated with Taxonomy-aligned economic activities

These are investments into assets or processes that are essential for executing Taxonomy-aligned activities. Examples include:

- Acquisition and operation of biogas plants producing electricity from biomass
- Installation and operation of photovoltaic (PV) plants
- Installation and operation of HVAC PV systems
- Upgrades to existing biogas plants
- Investments in energy-efficient equipment
- Installation and operation of battery energy storage systems

b) CAPEX as part of a plan to upgrade Taxonomy-eligible activities to become Taxonomy-aligned or to expand aligned activities

- No investments under category (b) were recorded during the 2024 reporting period, as the investment plan was not yet available at the required granularity.

c) CAPEX related to the purchase of output from Taxonomy-aligned activities or measures enabling low-carbon transitions or GHG reductions

- No investments under category (c) were recorded during the 2024 reporting period.

2024 Reporting Highlights

All reported investments for fiscal year 2024 belong to category (a). The most significant Taxonomy-aligned CAPEX includes:

- Construction and operation of ground-mounted PV power plants in Germany (Activity CCM 4.1: Electricity generation using solar photovoltaic technology)
- Construction and operation of rooftop PV solutions in Austria (Activity CCM 4.1: Electricity generation using solar photovoltaic technology)
- Upgrades to biomass plants operating in Italy (Activity CCM 4.20: Electricity and heat generation – biomass and biogas)

Reconciliation

The Group’s total CAPEX is fully reconcilable with the consolidated financial statements, as detailed in:

- Note 3: Property, Plant and Equipment
- Note 5: Intangible Assets
- Note 20: Leases (Right-of-Use Assets / Lease Liabilities / Financial Lease Assets)

Refer to Chapters 3, 5, and 20 of the Annual Report 2024 for full reconciliation.

Further explanations

There is a significant portion of non-eligible CAPEX acquired through business combination. The activities of the newly acquired companies will be subject to further EU Taxonomy screening during the following reporting period.

OPEX KPI

Definition

The OPEX KPI is defined as Taxonomy-aligned OPEX (numerator) divided by our total OPEX (denominator).

Total OPEX consists of direct non-capitalised costs that relate to

research and development, building renovation measures, short-term leases, as well as all forms of maintenance and repair. This includes:

- **Research and development expenditure** recognised as an expense during the reporting period in our income statement (see table Other operating expenses in chapter 23. Selling and Administrative Expenses, Operating Expenses and Income of our Annual Financial Report 2024). In accordance with paragraph 126 of IAS 38, R&D expenditures recognised as expenses during the reporting period are included, provided they are directly attributable to research or development activities.
- The volume of **non-capitalised leases** was determined in accordance with IFRS 16 and includes expenses for short-term leases and low-value leases (see table Selling and administrative expenses in chapter 23. Selling and Administrative Expenses, Operating Expenses and Income of our Annual Financial Report 2024). Although low-value leases are not explicitly referenced in the Disclosures Delegated Act, we interpret the regulation to include them, based on the underlying principles of cost transparency and operational relevance.
- **Maintenance and repair expenditures** were determined based on the maintenance and repair costs allocated to our internal cost centres (included in row Operating costs for cars and Repair and Maintenance in the table Selling and administrative expenses in chapter 23. Selling and Administrative Expenses, Operating Expenses and Income of our Annual Financial Report 2024).
- In certain entities where Elevion Group owns and operates assets, repair and maintenance expenditures are reported under “Cost of Sales” (specifically “External conversion costs”) due to reclassification for gross margin calculation purposes. These expenditures were allocated to the reported OPEX KPI after detailed screening at the level of particular analytical accounts.

In general, the above-mentioned categories include external costs for services and material costs for daily servicing, as well as for regular and unplanned maintenance and repair measures and in some cases also the staff costs. These costs are directly allocated to our PP&E. Amortisation and depreciation are not included in the OPEX KPI. With regard to the numerator, we refer to the corresponding statements on the CAPEX KPI.

Taking into account that the main business focus of Elevion Group companies belonging to the so-called ESCO (i.e. Energy Service COmpanies) industry sector, the value of total OPEX KPI defined according to the EU Taxonomy regulation is not expected to be significant. This is also typical for reporting period 2024, in which the OPEX KPI denominator was reported at the amount of 12 608 tEUR out of which the most significant aligned expenditures are then connected mainly with activity 4.20 “Electricity and heat generation - biomass and biogas” which includes mainly the repair and maintenance of own-operated biogas plants. Another EU Taxonomy aligned OPEX relates to the activity 4.1 “Electricity generation using solar photovoltaic technology”, in which the expenses are caused primarily by maintaining the installed and/or operated photovoltaic plants. Research and development expenditures are represented solely by the company Hermos, which develops highly customised software solutions for industry automation recognised as aligned taxonomy activity 8.2 “Data-driven solutions for GHG emissions reductions”. In the reporting period 2024, the R&D OPEX related to this activity is recognised as eligible, not aligned.

CONTEXTUAL INFORMATION

Turnover KPI

Quantitative breakdown of the numerator

In the table below, we show a quantitative breakdown of the numerator for the turnover KPI. We list projects and operating lease income, sale of goods and products, services, energy, and other sources of income.

	tEUR
Projects	611 875
Sale of goods	3 977
Sale of products	5 759
Sale of energy	25 759
Service	110 945
Other	2 401
Total	760 716

The key drivers of change in the turnover KPI over the reporting period 2024 were not only growth of the Group and its activities, which are generally focused on the services related to the end-to-end decarbonisation and higher energy efficiency solutions, but also the integration of companies newly acquired in the prior reporting period and their contribution to the Group consolidated turnover (activity CCM 4.20), improvement in the data collection processes enabling the identification of new activities (CCM 4.10) and more robust reporting structure.

The observed decrease in taxonomy-aligned activity CCM 7.6 is primarily attributable to a reduction in rooftop photovoltaic (PV) installations. This activity, as defined by the EU Taxonomy, includes only PV systems directly integrated into buildings. The current market environment for rooftop PV is highly dynamic, which has influenced project execution across the Elevion Group portfolio.

To balance this shift, Elevion Group members have strategically increased their focus on CCM 4.1 activities. This category encompasses the installation of ground-mounted photovoltaic power plants and the operation of own PV systems, regardless of their location. This reallocation of efforts reflects a proactive adaptation to market conditions while maintaining alignment with taxonomy-eligible climate change mitigation objectives.

The turnover related to CCM 7.4 is newly reported as eligible, not aligned in comparison with the 2023 reporting period. The activity represents a minor share of the overall portfolio and was delivered by only a few Elevion Group members. Due to the outcome of the technical screening, particularly the DNSH criteria related to the climate risks assessment in the particular area, alignment could not be confirmed for the reported projects in 2024.

As part of enhanced data screening and reporting process improvements, a reclassification was identified in the 2023 reporting, involving a swap of revenues between activities CCM 7.5 and CCM 3.5. Following the correction of this reporting inaccuracy, the turnover development for CCM 3.5 is now more accurately reflected.

The adjusted figures show that the turnover related to CCM 3.5 has been primarily influenced by broader market trends and a decline in revenues from a specific company within the Elevion Group. In contrast, CCM 7.5 continues to demonstrate consistent year-on-year growth, indicating a stable and expanding contribution from this activity across the Group’s portfolio.

CAPEX KPI

Quantitative breakdown at the economic activity aggregated level

In FY 2024, our Taxonomy-aligned CAPEX is associated with activities 4.1, 4.20 and 4.10. In the table below, we show a breakdown of the amounts included in the numerator.

Quantitative breakdown of CAPEX numerator at economic activity level (in tEUR)

Activity	Additions to PP&E	Internally generated or purchased intangibles	Right-of-use assets	Sum	Thereof acquired through business combination
CCM 3.5	779	0	133	911	0
CCM 4.1	4 507	0	0	4 507	0
CCM 4.10	229	0	0	229	0
CCM 4.20	2 169	5	2 737	4 910	0
CCM 4.30	7 721	146	0	7 867	0
CCM 6.5	42	0	0	42	0
CCM 8.2	32	5 693	0	5 724	0
Total	15 478	5 843	2 869	24 191	0

The key drivers of change in the CAPEX KPI over the reporting period 2024 were finalised construction of a ground-mounted photovoltaic power plant in Germany, which was the main contribution to the reported Taxonomy-aligned CAPEX in the prior reporting period. Also, the taxonomy-aligned acquisitions were not identified in 2024 which caused a decrease in reported value.

OPEX KPI

Quantitative breakdown of the numerator

The table below shows the breakdown of the OPEX numerator into its components based on the definition of OPEX in the Disclosures Delegated Act.

Quantitative breakdown of OPEX numerator

	OPEX (tEUR)
Repair and maintenance	2 619
Non-capitalised leases	0
R&D expenses	211

The reported OPEX KPI for the 2024 period reflects methodological improvements. These enhancements enabled a more accurate identification of expenditures, particularly in the denominator, but also in the numerator.

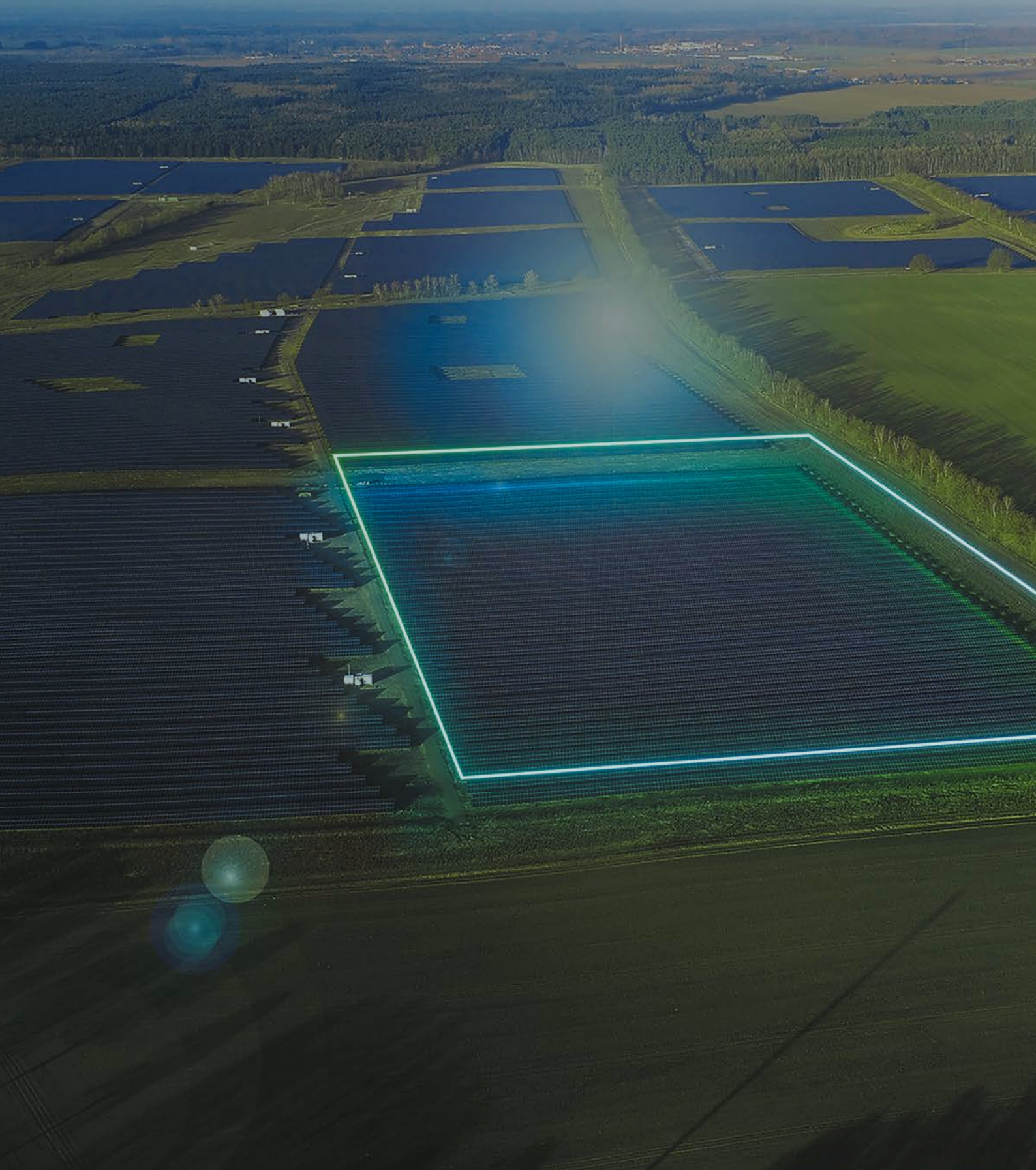
Initially, SG&A categories served as the basis for OPEX reporting. However, further internal review revealed that certain entities had classified repair and maintenance costs under alternative reporting categories—specifically External Conversion Costs. This reclassification is due to the treatment of expenditures related to the maintenance of own-operated assets within gross margin calculations.

Entity-Level Insights

- **Austria:** SynecoTec GmbH is the only asset-owning entity. Maintenance services are externally sourced in limited volumes, with no internal FTEs identified.
- **Italy:** Biogas and energy efficiency assets are maintained externally. Related expenditures are captured under External Conversion Costs, with no internal costs reported.
- **Germany:** Entities operating energy efficiency assets rely on external service providers for maintenance. However, ground-mounted PV plants are maintained internally.

The identification and allocation of internally incurred expenditures related to EU Taxonomy-aligned OPEX will be further refined in future reporting periods. Given that the Taxonomy definition of OPEX is not typically reflected in standard financial reporting structures, this area presents a clear opportunity for methodological enhancement and deeper integration into internal reporting frameworks.

ESRS E1 CLIMATE CHANGE





GOVERNANCE

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 GOV-3 INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

In 2024, Elevion Group management received ESG-linked goals as part of ČEZ Group's broader ESG strategy. These goals include contributing to the growth of ESG ratings in line with Vision 2030 and implementing measures to meet mid-term ESG commitments. The ESG targets were communicated to top management throughout Elevion's subsidiaries and are included in performance evaluations and incentive programmes. Specifically, ESG performance forms part of the bonus arrangements and KPIs of Elevion Group executives, reinforcing accountability and strategic alignment with long-term sustainability objectives.

The ESG-related KPI goals assigned to Elevion top management were:

- Growth of ČEZ ESG rating in line with the ambitions of Vision 2030
- Implementation of measures leading to the fulfillment of ČEZ Group's medium-term ESG commitments

Each ESG KPI was assigned a weight of 5% of the total bonus value, ensuring that sustainability considerations are embedded in executive compensation.



STRATEGY

DISCLOSURE REQUIREMENT E1-1 – TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

Elevion Group's decarbonisation strategy is actively being implemented across its operations. As of 2024, the Group has finalised its GHG inventory, which will serve as the new baseline year for emissions tracking. The 2024 Scope 1 emissions show a notable increase compared to prior years, primarily attributable to assets such as, cogeneration units and gas boilers are operated under Elevion's direct control.

In parallel, the Group is investing inorganically into boilers and cogeneration units. While these assets increase Elevion's reported carbon footprint, they represent emissions that were previously attributable to other operators. Moreover, cogeneration units and modern boilers typically offer higher energy efficiency compared to standalone grid-based systems, resulting in net carbon savings for end users.

The long-term strategy anticipates that, at the end of these assets' lifecycle—or earlier if required by regulatory changes or customer preferences—Elevion will transition these systems to heat pumps or other low-emission alternatives. Where feasible, biomethane may also be used as a substitute fuel, ensuring continuity of service while supporting decarbonisation goals. In this respect, Elevion is also initiating biomethane production, which may serve as a future energy source for its customers.

Elevion's approach is pragmatic and client-centric, recognising that decarbonisation must be achieved without compromising energy reliability or affordability. In this respect, Elevion's strategy prioritises customised low-carbon energy solutions, conversion of fossil fuel assets, and integration of AI-supported energy management systems. Elevion is exploring pathways such as mid- to long-term fuel shifts (e.g. hydrogen, synthetic fuels), and modular energy infrastructure designed to flexibly respond to evolving regulatory and market dynamics.

Elevion continues to deliver PV solutions to its clients as part of

its core business and has recently started operating two new solar parks constructed by Belectric (Deubach and Reddehausen), which are now held on Elevion's balance sheet. In addition, the Group plans to invest further into PV installations at its own facilities to support self-consumption and reduce Scope 2 emissions. In parallel, Elevion is actively engaging with landlords to improve energy transparency and facilitate the switch to green energy suppliers where feasible. A key pillar of the strategy is also the Group-wide Car Policy, which sets the ambition for a full transition to electric vehicles by 2040. By 2030, Elevion expects a significant shift toward EVs across all countries, with specific targets and adoption rates varying by market. This phased approach reflects local infrastructure readiness, regulatory frameworks, and operational needs, while maintaining a unified direction toward fleet decarbonisation.

Elevion Group's formal climate transition plan is currently under development. This report presents selected components of the strategy, including decarbonisation goals, renewable energy deployment, and asset conversion pathways. The full transition plan will be completed and disclosed in the future reporting cycle.

Strategic Objectives

- **Climate Neutrality:** Elevion Group aims to contribute to the EU's climate neutrality goals by delivering scalable decarbonisation solutions across its operations and client services.
- **End-to-End Decarbonisation:** The Group provides integrated energy efficiency and renewable energy solutions through 80+ specialised companies across 13+ European markets.

Key Actions and Milestones

- **Renewable Energy Deployment:**
 - Achieved **1 GW installed capacity** of photovoltaic systems in Germany and **5 GW globally**.
 - Added **740 MWp of new PV** and **40 MW of battery energy storage** in 2024.
 - Already produced 850 000 smc of Biomethane in 2024

- **Energy Efficiency Projects:**
 - Completed over **6,000 projects** aimed at reducing CO₂ emissions and improving energy performance.
 - Delivered innovative solutions such as energy self-sufficient systems and cogeneration units for industrial applications.
- **Digitalisation and Innovation:**
 - Launched **Elevion Green**, a digital platform for B2B ESCO services.
 - Developed **AI assistant “Elevi”** to support clients in navigating PV and battery solutions.
- **Market Expansion:**
 - Entered the Spanish utility-scale PV and battery storage market.
 - Strengthened partnerships in the USA for automation and energy management.

Elevion Group remains committed to expanding its footprint in decentralised energy and decarbonisation services. The Group will continue to invest in clean technologies, digital tools, and strategic partnerships to accelerate the transition toward a low-carbon future.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 IRO-1 DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL CLIMATE-RELATED IMPACTS, RISKS AND OPPORTUNITIES

This section provides the climate-specific application of the general double materiality assessment (DMA) process described in ESRS 2 IRO-1, focusing on climate-related impacts, risks, and opportunities in line with ESRS E1 and E1-9.

Climate-related IROs were assessed across three time horizons:

- **Short-term** (2024): e.g. acute physical risks such as floods and cold waves
- **Medium-term** (2025–2030): e.g. regulatory changes under the EU Green Deal and Fit-for-55
- **Long-term** (2031–2040): e.g. chronic risks such as temperature rise and soil degradation, and opportunities in climate resilience and low-carbon technologies

A detailed resilience analysis of physical climate risks was conducted using RCP 4.5 and RCP 8.5 scenarios, as described in Disclosure Requirement SBM-3. This analysis informed the prioritisation of climate-related IROs and supports Elevion’s strategic planning and adaptation measures.

Description of the process to identify and assess material climate-related impacts, risks and opportunities

In addition to resilience analysis, Elevion Group applied a structured process to identify and assess climate-related impacts, focusing on impacts on climate change, particularly GHG emissions, as required by ESRS E1.

1. Screening of Activities and Plans for GHG Emission Sources

We systematically reviewed all current operations and planned projects to identify actual and potential future sources of GHG emissions. This screening included:

Mapping operational boundaries: All owned and operated assets under the ESCO model were included such as cogeneration units, gas boilers, biogas plants, photovoltaic systems, and battery storage.

Technology review: Identification of emission-intensive technologies such as gas boilers and cogeneration units, alongside low-emission technologies (PV, battery storage, heat pumps). Lifecycle assessment of heavy assets on Elevion’s balance sheet such as CHP units, gas boilers, biogas stations, PV’s, etc. based on publically available studies and information provided by suppliers

Scenario-Based Risk analysis.

- I. Physical risks were evaluated using RCP 4.5 and RCP 8.5 climate scenarios, supported by CRIF S.p.A./RED S.p.A. models and Copernicus data.
- II. Geographic risk screening flagged; Italy, Austria, Poland, and Romania for elevated exposure to floods, droughts, and soil degradation.

2. Assessment of Climate-Related Impacts

Impacts were evaluated using the double materiality approach, considering:

- Impact materiality: Contribution to climate change through Scope 1 and Scope 2 emissions from energy consumption and operations.
- Positive impacts: GHG mitigation potential from renewable energy deployment, energy efficiency projects, and biogas utilisation.

Dependencies and interactions: For example, reliance on agricultural residues for biogas creates both a mitigation opportunity and a risk of feedstock shortage due to drought.

3. Integration with Risk and Opportunity Analysis

Screening of investment plans for potential emission drivers, including expansion of renewable energy and electrification of fleet. Elevion’s additional decarbonisation strategy, transition plan, and investment roadmap indicates (>€700 million planned for low-carbon technologies).

Future plans: ESG Steering Committee is responsible for monitoring the continuous improvement, including expansion of Scope 3 coverage and supplier engagement.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Elevion Group’s strategy is inherently aligned with EU climate objectives, prioritising energy efficiency, renewable energy deployment, and decarbonisation. The business model integrates photovoltaic systems, biogas and biomethane production, and battery storage into its core offerings, with several large-scale solar parks now operated directly. Climate-related risks—such as supply chain disruptions and regulatory shifts—are mitigated through localised operations, diversified sourcing, and continuous ESG monitoring. The value chain is structured to support low-emission development, with upstream suppliers screened for sustainability criteria and downstream solutions tailored to reduce client emissions. These strategic elements underpin Elevion’s contribution to climate mitigation and resilience.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

Stakeholder expectations related to climate change are embedded in Elevion Group's strategic planning. Customers increasingly demand decarbonisation support and transparent ESG reporting, while financing partners prioritise alignment with EU climate goals and risk mitigation. These views have shaped Elevion's expansion into large-scale renewable energy assets and its investment in photovoltaic systems, biogas, and battery storage. Internal stakeholders, including ESG managers and subsidiary contacts, contribute to climate-related decision-making through structured consultations and performance-linked processes. These insights informed Elevion's double materiality assessment and support its climate transition strategy.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Risks were analyzed across three distinct time horizons — short-term (2024), medium-term (2025–2030), and long-term (2031–2040) — to reflect their evolution over time.

Physical risks

A physical risk assessment was conducted to evaluate the vulnerability and exposure of the company's assets and operations to climate-related hazards. The analysis distinguishes between acute physical risks, which arise from extreme events such as floods, wildfires, heatwaves, and storms, and chronic physical risks, which result from long-term climate changes including temperature rise, water stress, and soil degradation.

A third-party solution from CRIF S.p.A. was used to conduct the assessment in 2023 and 2024. In partnership with RED S.p.A., applying a high-resolution regional climate risk model. The methodology integrates geographical hazard mapping with sectoral vulnerability analysis, allowing for a tailored evaluation of risk at the level of individual company sites.

Limitations and Uncertainties

While the methodology is based on state-of-the-art model and other sources such as Copernicus Climate Store, Joint Research Sources, European Resource Institute, etc., etc., the resilience analysis has the following limitations:

- **Scope:** The assessment focused on Elevion's own operations and did not fully cover upstream and downstream value chain risks due to data constraints.
- **Scenario Uncertainty:** Results depend on assumptions in RCP 4.5 and RCP 8.5 scenarios; actual climate trajectories may differ.
- **Data Granularity:** Geospatial analysis was performed at regional level; site-specific microclimatic variations may not be fully captured.
- **Physical Risk Evolution:** Long-term projections involve inherent uncertainty regarding policy, technology adoption, and socio-economic factors.

These limitations will be addressed through enhanced data collection, supplier engagement, and scenario refinement in future reporting cycles.

CLIMATE SCENARIO ANALYSIS

The resilience analysis of physical risks was conducted using both RCP 4.5 and RCP 8.5 scenarios. RCP 8.5 was selected to reflect worst-case conditions in line with ESRS SBM-3 requirements.

(a) Sources and Scientific Alignment

Both scenarios are based on **state-of-the-art climate science**, using models validated by the scientific community and sourced from the, for example, **Copernicus Climate Store**. These models provide projections of key meteorological variables such as temperature, precipitation, and wind patterns.

(b) Narratives, Time Horizons, and Endpoints

The combination of RCP 4.5 and RCP 8.5 covers a **plausible range of risks and uncertainties**, from moderate mitigation to worst-case conditions.

RCP 4.5 (Intermediate Emission Scenario)

- **Medium-Term Horizon: 10–20 years (2025–2045)**
 - Based on Paris Agreement commitments and current policies.
 - Moderate climate change impacts expected.
- **Long-Term Horizon: 2046–2100**
 - Emissions peak around 2040, then decline.
 - Global temperature increase projected: **+2°C to +3°C by 2100.**

RCP 8.5 (High Emission Scenario)

- **Medium-Term Horizon: 10–20 years (2025–2045)**
 - Higher intensity of hazards even in the near term.
- **Long-Term Horizon: 2046–2100**
 - No significant mitigation assumed.
 - Global temperature increase projected: **+4°C or more by 2100.**
 - Severe impacts on chronic and acute hazards (e.g. extreme heat, flooding, storms).

(c) Key Forces and Drivers Considered

- **Policy assumptions:** EU Green Deal, Fit-for-55, and evolving carbon pricing
- **Macroeconomic trends:** Energy price volatility, financing conditions
- **Energy mix and technology adoption:** Electrification, battery storage, hydrogen, AI-driven energy management
- **Climate variables:** Temperature rise, precipitation patterns, drought frequency, flood intensity

These drivers are relevant because they directly influence Elevion's asset vulnerability, investment planning, and service offerings in energy efficiency and renewable energy.

(d) Inputs and Constraints

- **Inputs:** High-resolution regional climate risk model developed by CRIF S.p.A. and RED S.p.A., geospatial hazard mapping, and sectoral vulnerability scoring (scale 1–10) for all EU27 company sites.

- **Constraints:**
 - Value chain risks were excluded due to data limitations.
 - Analysis focused on company-controlled sites; micro-climatic variations may not be fully captured.
 - Transition risk scenario quantification (e.g. SPP1.9) is planned for future cycles.

Methodology and Scope

The analysis covered all company sites located within the EU27 region. Each site was evaluated for exposure to 18 distinct natural hazards, including both climate-related and seismic risks. Risk scores were calculated on a scale from 1 to 10, reflecting the expected economic impact of each hazard based on location and sector-specific vulnerability.

The resilience analysis focused on Elevion's own operations only because:

- **Data Limitations:** Comprehensive, site-specific climate risk data for upstream suppliers and downstream customers was not available during the reporting period.
- **Control and Influence:** Elevion has direct control over its own assets and operations, enabling accurate assessment and mitigation planning. In contrast, value chain risks depend on third-party actions and require separate engagement processes.
- **Phase-In Approach:** In line with ESRS guidance, Elevion will progressively expand the scope of climate risk analysis to include material value chain actors as data availability improves and supplier ESG integration matures.

The assessment included:

- Chronic risks: e.g. temperature change, sea level rise, water stress, soil erosion.
- Acute risks: e.g. floods, droughts, wildfires, heatwaves, landslides.
- Earthquake risk: evaluated separately due to its non-climatic nature.

Results of Resilience Analysis

The output of the assessment includes synthetic indicators:

- Physical Risk Alert: overall exposure to all hazards.
- Chronic Score: exposure to long-term climate changes.
- Acute Score: exposure to extreme weather events.
- Acute and Chronic Flag: identifies sites with high exposure to both risk types.

These indicators are expressed qualitatively (Low, Moderate, Medium, High, Very High) and are used to inform strategic planning and risk management.

How Risks Evolve Across Scenarios and Time Horizons.

Using RCP 4.5 (moderate mitigation) and RCP 8.5 (high-emission) scenarios, Elevion analyzed risk evolution over three horizons:

- **Medium-term (2025–2045):** Acute risks dominate, such as floods and cold waves, with limited chronic changes. Soil degradation might impact feedstock availability for biogas stations in the mid-term horizon.
- **Long-term (2046–2100):** Under RCP 8.5, chronic risks intensify—temperature rise accelerates heatwaves and wildfire probability, water stress becomes systemic, and soil erosion threatens agricultural supply chains. RCP 4.5 shows moderated trends but still significant impacts on asset resilience and operational costs.

Impact on Assets and Activities

- **Flooding:** High-risk sites in Italy, Germany, and Austria face potential damage to cogeneration units and biogas facilities, requiring elevated adaptation costs.
- **Drought and Water Stress:** Biogas operations in Italy and Poland risk feedstock shortages, impacting energy output and revenue.
- **Heatwaves and Wildfires:** Increased cooling demand for technical building systems and risk of service disruption in Austria and Romania.
- **Soil Degradation:** Long-term threat to agricultural residue supply for biogas plants, creating dependency risks and cost volatility.

Differences Between Scenarios

- **RCP 4.5:** Risks evolve gradually; adaptation measures (e.g. flood defenses, diversification of feedstock) can mitigate most impacts.
- **RCP 8.5:** Risks accelerate sharply post-2030, requiring transformative measures such as relocation of high-risk assets, major investment in water-efficient technologies, and diversification of renewable energy sources.

Financial Impact Assessment

The anticipated financial effects of material physical risks were evaluated, including:

- The proportion and monetary value of assets at risk.
- The geographic location of high-risk assets.
- The share of net revenue exposed to physical risks.

This assessment supports the identification of adaptation needs and informs the company's climate-related policies and targets.

As part of the physical risk assessment conducted for Elevion, several potential physical risks have been identified across the countries where the group operates. These include floods in Italy, Germany, and Austria, landslides in Austria, cold waves in Austria and Poland, soil degradation in Poland, and a possible risk of earthquakes in Italy and Romania. These risks vary in nature and likelihood, but they represent relevant environmental factors that may influence strategic planning and resilience measures. The assessment serves as a basis for further evaluation and integration into Elevion's broader sustainability and risk management framework.

Transitional risks

Transition risks were assessed based on internal professional judgment and will be further developed using a formal scenario-based approach and also in line with the Paris agreement in subsequent reporting cycles.

Transitional risks arise from the shift toward a low-carbon economy and include regulatory, technological, market, reputational, and operational risks. These risks were considered across Elevion Group's operations and value chain and are integrated into its strategic planning and risk management processes.

Elevion Group has identified several material transitional risks. Regulatory and policy risks stem from exposure to evolving EU climate legislation, such as the Fit for 55 package and the EU Taxonomy, which may result in increased compliance costs and expanded reporting obligations. Market and economic risks include volatility in energy prices during the transition from fossil fuels to renewable sources, which can affect project viability and customer demand. Technology and innovation risks are also significant, particularly the integration challenges faced across diverse subsidiaries and markets as new technologies are adopted. Reputational risks arise from rising

stakeholder expectations for transparent climate disclosures and net-zero commitments. There is also a risk of greenwashing accusations due to incomplete or inaccurate ESG reporting, alongside increased scrutiny of supply chain ESG performance.

Operational risks include the need for workforce reskilling and recruitment in emerging green technology areas. Additionally, project execution may be delayed due to permitting issues, grid constraints, or regulatory bottlenecks.

Operational cost savings: Elevion Group's focus on climate change adaptation involves reducing greenhouse gas emissions through increased use of renewable energy and enhanced energy efficiency, which also yields operational cost savings. Adaptation efforts bolster ecosystem protection and resource conservation, aligning with global sustainability goals. Financially, these initiatives not only mitigate risks associated with climate volatility, such as supply chain disruptions, but also position Elevion to benefit from regulatory incentives and enhance its competitive market stance. Furthermore, by prioritising resilient infrastructure and sustainable practices, Elevion improves community and employee well-being, increasing its attractiveness to investors and stakeholders looking for environmentally responsible companies. Overall, these strategies are integral to Elevion's long-term sustainability and operational stability.

Potentially Incompatible Assets and Activities

As part of this assessment, Elevion reviewed its asset base and business activities for compatibility with a climate-neutral economy. The analysis identified certain gas-fired cogeneration units and older fossil-based heating systems as having significant locked-in GHG emissions if operated over their full technical lifetime. While these assets currently deliver high-efficiency energy solutions, they may become incompatible with net-zero pathways beyond 2030 without conversion or replacement.

To mitigate this risk, Elevion Group will implement the following measures in the future:

- **Develop transition plans** to phase out or retrofit these assets with low-carbon alternatives (e.g. heat pumps, hydrogen-ready boilers, biomethane integration).
- **Allocate investment (>€700 million)** toward renewable energy, electrification, and energy storage solutions to reduce dependency on fossil-based technologies.
- **Integrate contractual flexibility** in ESCO agreements to allow technology upgrades aligned with EU climate targets.

This proactive approach ensures that Elevion's portfolio remains aligned with the EU Green Deal and Fit-for-55 objectives while minimising stranded asset risks in the future.

DISCLOSURE REQUIREMENT E1-2 – POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

Elevion Group maintains two distinct but complementary policies:

1. ESG Policy

The ESG Policy is an umbrella framework that defines Elevion's strategic approach to Environmental, Social, and Governance issues. It sets out principles for integrating ESG considerations into investment decisions, stakeholder engagement, and corporate governance. Its scope is broad, covering:

- Environmental aspects (e.g. energy efficiency, GHG reduction)
- Social aspects (e.g. human rights, labour standards, diversity)
- Governance aspects (e.g. transparency, anti-corruption, ethical conduct)

The ESG Policy aligns Elevion with global standards such as the UN Global Compact and UN Principles for Responsible Investment, and serves as the foundation for sustainability reporting and strategic ESG integration across all subsidiaries.

2. Environmental Policy

The Environmental Policy is a specialised document focused exclusively on environmental protection and climate action. It operationalises Elevion's environmental commitments by defining principles, targets, and detailed procedures for:

- GHG emission management (Annex 1)
- Water and waste management (Annexes 2 & 3)
- Pollution prevention and biodiversity protection (Annexes 5 & 6)
- Energy efficiency and sustainable buildings (Annexes 7 & 8)

This policy applies to all projects and operations and includes annexes that provide actionable guidelines for day-to-day environmental management. It is a practical implementation tool for achieving Elevion's net-zero target by 2040.

Key Difference

- The ESG Policy sets the strategic direction for sustainability across all ESG dimensions.
- The Environmental Policy provides technical and operational guidance for environmental performance and compliance.

Together, these policies ensure Elevion addresses sustainability both at a strategic level (ESG) and an operational level (environmental management).

Implementation and Governance

The policies are implemented under the supervision of the group ESG Manager (Chirag Girdhar) and the Head of Governance, Risk & Compliance (Lucie Vosečková). Environmental performance is monitored annually and disclosed in the Elevion Group's consolidated sustainability report.

To support implementation, we focus on five strategic areas:

1. Green Energy – Expansion of renewable energy and storage systems.
2. Innovation – Annual increase in sustainability-focused R&D spending.
3. Sustainable Procurement – Growth in Tier 1 suppliers aligned with our Code of Conduct.
4. Workforce Development – Regular ESG and ethics training for employees.
5. Low-Emission Mobility – Implementation of a Car Policy aimed at transitioning the company fleet to low-emission vehicles. The policy also promotes carpooling, cycling, and public transport as part of our Scope 1 emissions reduction strategy.

Alignment with International Standards

Our policies are aligned with:

- UN Global Compact – Ten Principles
- UN Principles for Responsible Investment (UN PRI)
- UN Sustainable Development Goals (SDGs)

These frameworks guide our ethical, environmental, and governance commitments.

Stakeholder Engagement and Accessibility

The ESG policy was developed with consideration of key stakeholder interests. It is communicated through onboarding, internal training, newsletters, and is accessible via the company intranet. Suppliers are informed through contractual obligations and compliance monitoring.

Key Stakeholder Interests Considered

- **Employees:** Desire for a safe, inclusive, and sustainable workplace; clarity on ESG responsibilities; training and career development in green technologies.
- **Customers:** Demand for low-carbon, energy-efficient solutions and transparent ESG performance reporting.
- **Suppliers:** Clear sustainability requirements and support for compliance with Elevion's ethical and environmental standards.
- **Investors:** Assurance of long-term value creation, risk management, and alignment with EU Taxonomy and CSRD requirements.
- **Regulators:** Compliance with EU climate legislation, Fit-for-55, and reporting standards under ESRS.

How These Interests Were Integrated

- Policy objectives (e.g. net-zero by 2040, renewable energy deployment) reflect investor and regulatory expectations.
- Annexes in the Environmental Policy (e.g. GHG, water, waste management) address operational concerns raised by employees and clients.
- Supplier engagement clauses ensure ESG compliance across the value chain.
- Regular reporting and transparency commitments respond to investor and societal expectations for accountability.

Certain elements of the ESG Policy are currently being implemented across Elevion Group entities and will be further formalised in the next reporting cycles to ensure full ESRS alignment.

DISCLOSURE REQUIREMENT E1-3 – ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES

Elevion Group has implemented a wide range of climate mitigation measures across its operations. These actions focus on reducing greenhouse gas emissions and improving energy performance through renewable energy deployment, energy storage, energy efficiency, sustainable buildings, and innovation.

Below, actions are distinguished between those **completed in 2024** and those **planned for future years**, with an explanation of how each measure supports GHG reductions and, where possible, the achieved or expected impact.

1. Renewable Energy Deployment completed in 2024

Elevion Group continues to expand its renewable energy portfolio across Europe. In 2024, the Group commissioned several large-scale photovoltaic (PV) projects, including floating PV systems and pilot agrivoltaic installations that combine solar energy generation with agricultural land use. These nature-based solutions enhance land productivity while contributing to biodiversity preservation.

Examples of key projects delivered for customers in 2024:

- **Zwölferhorn Cable Car (Austria):** The world's first energy self-sufficient cable car, powered by an 800 kWp PV system and 500 kWh battery storage. *GHG Impact: Achieves full energy self-sufficiency, avoiding grid emissions (~180 tCO₂e/year).*
- **Halutziot Solar Farm (Israel):** Repowered from 55 MWp to 88 MWp, now one of Israel's largest hybrid solar-battery projects. *GHG Impact: Additional renewable capacity reduces ~28,000 tCO₂e/year.*

Example of key Projects on balance sheet of BELECTRIC (Member of Elevion Group):

Solkraftwerk Deubach GmbH & Co. KG and Solkraftwerk Reddehausen GmbH & Co. KG (Germany): PV installations with a combined capacity of 56.2 MWp, contributing to Climate Change Mitigation

Context and Approach:

In line with ESRS E1, Elevion reports on its contribution to climate change mitigation through BELECTRIC's development and operation of photovoltaic (PV) power plants. While avoided emissions are not included in our GHG inventory report, they provide important context on the positive impact of our activities on the energy transition.

Methodology:

- **Basis of estimated calculation:**
 - Avoided emissions were calculated using project-specific generation data, national grid emission factors, and specific yields (sources: Our World in Data, PVGIS).
 - For construction projects (EPC), avoided emissions are projected over a **30-year operational lifetime** of the installed capacity.
 - For Operation & Maintenance (O&M), avoided emissions reflect the **actual electricity generated in 2024** by PV plants under BELECTRIC's operational responsibility.
- **Scope:**
 - Only projects fully completed and handed over in 2024 were included.
 - The calculation focuses on **direct avoided emissions** from generating electricity.
 - Indirect emissions from construction processes, supply chains, and other lifecycle stages were excluded from the calculation.

Results for 2024

- **Total Avoided Emissions: ~13,699,682 tCO₂e**
 - **Construction (EPC):** ~12,547,659 tCO₂e (projected over 30 years; 758 MWp installed capacity)
 - **Operation & Maintenance:** ~1,152,023 tCO₂e (actual generation in 2024)
 - Including BELECTRIC-owned assets *Deubach* and *Reddehausen*: >19,000 tCO₂e

Interpretation and Relevance:

These figures demonstrate BELECTRIC's significant contribution to decarbonisation by replacing fossil-based electricity with renewable solar energy. While these avoided emissions are not part of our mandatory GHG disclosures, they illustrate the long-term climate benefits of our projects and our support to the EU's transition to a low-carbon economy.

Limitations

- Avoided emissions are based on assumptions regarding plant lifetime and national grid emission factors, which may change over time.
- These figures should not be interpreted as reductions in group's own carbon footprint.

2. Planned Actions (2025–2030)

Battery Energy Storage Systems (BESS)

- Target: 500 MW installed capacity by 2030.
GHG Impact: Facilitates higher renewable penetration, reducing curtailment and fossil backup.

Biogas Upgrades to Biomethane

- Further continue the operation of biogas plants using organic waste and agro by-products. *GHG Impact:* Avoids methane emissions from waste decomposition and replaces fossil fuels (~15,000 tCO₂e/year).
- Planned conversion of biogas plants to biomethane injection. *GHG Impact:* Further reduces fossil gas dependency and Scope 1 emissions.

Sustainable Buildings

- Group-wide rollout of EPC-certified buildings and submeters for granular monitoring. *GHG Impact:* Expected 10–15% reduction in building-related emissions.
- LED lighting, presence detectors, condensing boilers, Energy Star equipment, daylight maximization. *GHG Impact:* Cuts electricity and heating demand, reducing Scope 2 emissions by ~5–8%.

Group-Wide Renewable Energy, procurement, efficiency measures & policy

- Several subsidiaries achieved 100% renewable electricity coverage. *GHG Impact:* Eliminates Scope 2 emissions for those entities.
- Digital energy monitoring via ERP and ESG tools. *GHG Impact:* Enables real-time optimisation, reducing unnecessary consumption.
- Formal adoption to ensure 100% renewable electricity across all subsidiaries by 2030.

3. Financial Resources and EU Taxonomy Alignment

In 2024, Elevion allocated:

- €10.5 million in CAPEX for renewable energy and storage
- €1.3 million in OPEX for energy efficiency
- €5.7 million in innovation-related spending

These investments are reported in the financial statements under:

- “Property, Plant and Equipment – ESCO Projects, Intangible Assets – development costs”
- “Operating Expenses – Repair and maintenance” and “R&D expenses”

They are aligned with the EU Taxonomy Regulation (EU) 2021/2178, including:

- Activity 4.1 – Solar PV generation
- Activity 4.10 – Electricity storage
- Activity 4.20 – Generation of heat/electricity from bioenergy
- Activity 3.5 – Manufacture of energy efficiency equipment for buildings

- Activity 8.2 – Data-driven solutions for GHG emissions reductions

4. Dependency on Resource Availability

Elevion's ability to implement these actions depends significantly on the availability and allocation of financial and technical resources:

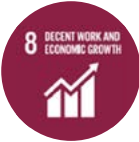
- Financial Resources: The five-year CAPEX plan includes over €700 million for decarbonisation projects. Timely access to financing and alignment with EU Taxonomy eligibility are critical for scaling renewable energy and storage projects.
- Human Resources: Skilled workforce availability for green technologies and digitalisation is essential for implementing energy efficiency and innovation measures.
- Supply Chain Resources: Procurement of PV modules, battery systems, and biogas equipment depends on global supply chain stability and compliance with ESG standards.
- Regulatory and Incentive Frameworks: Access to subsidies, green financing, and favorable permitting conditions influences project timelines and feasibility.

5. Remediation and Stakeholder Engagement

No significant environmental impacts requiring remediation were identified in 2024. Elevion remains committed to engaging with stakeholders and implementing corrective actions where necessary.

DISCLOSURE REQUIREMENT E1-4 – TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

Elevion Group has committed to achieving net-zero greenhouse gas (GHG) emissions by 2040. This ambition is supported by a structured decarbonisation pathway built on five strategic pillars: renewable energy deployment, energy storage, energy efficiency, sustainable buildings, and innovation. These pillars are aligned with the Group's material topics and the following Sustainable Development Goals (SDGs): SDG 7 (Affordable and Clean Energy), SDG 8 (Decent Work and Economic Growth), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).

SDG	GOAL	TARGET	NAME	Elevion Group MATERIAL TOPICS
	Goal 7 Ensure access to affordable, reliable, sustainable and modern energy for all	7.1	By 2030, ensure universal access to affordable, reliable and modern energy services	> Smart and sustainable services to customers to decrease their emissions
		7.2	By 2030, increase substantially share of renewable energy in the global energy mix	> Green energy
		7.3	By 2030, double the global rate of improvement in energy efficiency	> Innovative solutions
	Goal 8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all	8.2	Achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high-value added and labour-intensive sectors	
		8.5	By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value	
		8.8	Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment	> Innovative solutions
	Goal 12 Ensure sustainable consumption and production patterns	12.5	By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse	> Availability of skilled and diverse workforce
		12.7	Promote public procurement practices that are sustainable, in accordance with national policies and priorities	> Occupational health and safety
	Goal 13 Take urgent action to combat climate change and its impact	13.2	Integrate climate change measures into national policies, strategies and planning	> Decarbonisation > Green energy

To operationalise its climate strategy, Elevion Group has set the following measurable and time-bound targets:

Overview of targets related to climate change mitigation and adaption

Strategic Area	Goal	KPI	Progress
Renewables & energy storage	2027 Sum of installed capacity of renewables 2010 MWp Sum of energy storage: 200 MW	Sum of installed capacity of renewables Sum of energy storage	As of 31st December 2024, Total sum of installed capacity of renewables is 1 580 MWp Sum of energy storage 142 MWh
	2030 Sum of installed capacity of renewables: 3513 MWp Sum of energy storage: 500 MW		
Research and Development *	Increase innovation spending by at least 4% annually compared to the 2024 baseline Allocate €7.3 million to innovation by 2030 (from €5.7 million in 2024)	All directly attributable costs incurred by the Group (group companies) related to innovation irrespective whether OPEX or CAPEX (including internal labour or external consultancy costs)	As of 31 December 2024- innovation spending is 5.7 mEUR
Scope-2 Emissions (market based)	Reduce Scope-2 market-based emissions by 50% by 2035 compared to new baseline i.e. 2024	GHG reduction of emissions scope 2	Elevion Group established a new baseline in 2024 according to ESRS requirement
Scope 1 and 2	Achieve carbon neutrality by 2040 or earlier (net zero emissions) for Elevion Group' operated activities by reducing GHG emissions (Scope 1+2)	GHG reduction of emissions scope 1 & 2	

*All directly attributable costs incurred by the Group (group companies) related to innovation irrespective of whether OPEX or CAPEX (including internal labour or external consultancy costs)

Additional targets (such as Scope 1 target) are under development and will be expanded in future reporting cycles to reflect full ESRS MDR-T requirements, including time horizons, baselines, and responsible departments.

Details of targets related to climate change mitigation and adaptation

1. Renewable Energy and Storage:

- Reach 500 MW of installed battery energy storage capacity by 2030.
- Develop and expand renewable energy projects, including floating PV and agrivoltaics, across Europe and selected international markets.
- **Responsible:** Head of Green Energy

2. Innovation and R&D:

- Increase innovation spending by at least 4% annually compared to the 2024 baseline.
- Allocate €7.3 million to innovation by 2030 (from €5.7 million in 2024).
- **Responsible:** Chief Commercial Officer (strategy), CFO (tracking and reporting)
- Note: The revised annual growth target of 4% reflects an adjustment from the originally stipulated 10% increase. While the percentage growth has been lowered, the absolute ambition remains unchanged, with €7.3 million allocated to innovation by 2030. This revision accounts for the higher-than-expected 2024 baseline and ensures continued alignment with Elevion's strategic focus on decarbonisation, digitalisation, and ESG-linked innovation.

3. GHG Emissions Reduction:

3.1. Scope -2 (50% reduction by 2035)

- **Reduce Scope 2 market-based emissions by 50% by 2035** (i.e. to 1,880 tCO₂eq), compared to a 2024 baseline (3,760 tCO₂eq).
Scope 2 subtarget:
Implement energy-saving measures across all facilities, including LED lighting, energy-efficient heating, digital energy monitoring, prioritisation of buildings with Energy Performance Certificates (EPC), and installation of submeters for granular energy and water tracking.
- **Methodology:**
Market-based approach using residual mix factors and supplier-specific data where available. Baseline year: 2024 (3,760 tCO₂e).
- **Assumptions:**
Increased share of renewable electricity through supplier contracts and on-site PV; implementation of energy-saving measures (LED lighting, efficient heating, submeters, EPC-certified buildings).
- **Scientific Basis:**
Target aligns with EU Green Deal and Fit-for-55 objectives and is consistent with IPCC pathways limiting warming to well below 2°C.
- **Responsible:**
Facility Management (strategy), ESG Steering Committee (monitoring).

3.2. Scope 1 (Stabilisation by 2030, net-zero by 2040)

- **Stabilise Scope 1 emissions by 2030**, with reductions expected thereafter as fossil-based assets are gradually converted to low-emission alternatives.
- **Methodology:**
Based on current asset lifecycle and planned conversion of fossil-based systems to heat pumps and biomethane.
- **Assumptions:**
No major expansion of fossil-based assets; gradual adoption of low-emission technologies; regulatory support for renewable fuels.
- **Scientific Basis:**
Aligned with EU climate neutrality goals and sectoral decarbonisation pathways.
- **Achieve net-zero emissions across all operations by 2040.**
- **Responsible:**
Chief Commercial Office (strategy), ESG Steering Committee (monitoring).

Note:

- The Scope 2 target represents a revision from the originally stipulated 43% reduction, reflecting Elevion's updated energy transition strategy and improved data availability following enhancements in energy monitoring and supplier transparency.
- The previously defined Scope 1 reduction target of 43% has been fully withdrawn. A new baseline will be established once Scope 1 emissions stabilise, in line with the Group's strategy to gradually convert fossil-based assets to low-emission alternatives.

Implementation and Monitoring

The measures apply across all Elevion Group entities in the EU and selected international markets. The described actions are part of an ongoing implementation plan and may not yet be fully reflected in all subsidiaries. Elevion Group will expand the scope and formalisation of these actions in future reporting years. They cover the full value chain, with a primary focus on directly controlled assets and increasing engagement with suppliers and landlords. Implementation follows a phased approach:

- 2024–2027: Initial deployment and scaling, including the establishment of a new GHG inventory baseline and integration of newly acquired fossil-based assets. While these assets temporarily increase Elevion's reported emissions, they represent emissions previously outside the Group's boundary and are targeted for future conversion.
- 2027–2030: Expansion and integration of low-emission technologies, including heat pumps, biomethane, and renewable energy systems, alongside significant EV fleet adoption.
- 2030–2040: Transition toward full decarbonisation of core operations, with net-zero ambition subject to asset lifecycle, regulatory developments, and fuel substitution pathways.

Progress is monitored regularly by the ESG Steering Committee to ensure alignment with strategic goals, regulatory expectations, and stakeholder transparency.

DISCLOSURE REQUIREMENT E1-5 – ENERGY CONSUMPTION AND MIX

Energy consumption and energy mix		2024	Unit
Fossil resources	Fossil energy consumption	97 289	MWh
	Share of fossil fuels in total energy consumption	48%	%
	Fuel consumption of crude oil and petroleum products	34 972	MWh
	Fuel consumption of coal and coal products	0	MWh
	Fuel consumption of natural gas	55 673	MWh
	Fuel consumption of other fossil fuel sources	0	MWh
	Consumption of purchased or acquired electricity, heat, steam and cold from fossil fuel sources	6 644	MWh
Nuclear resources	Consumption from nuclear sources	499	MWh
	Share of nuclear sources in total energy consumption	0%	MWh
Others	Consumption from other sources	0	MWh
	Share of other sources in total energy consumption	0%	%
Renewable resources	Total renewable energy consumption	104 028	MWh
	Share of renewables in total energy consumption	52%	%
	Consumption of fuels from renewable sources, including biomass	101 198	MWh
	Consumption of energy from non-fuel renewable sources that the Company has produced itself	2 562	MWh
	Consumption of purchased or acquired electricity, heat, steam and cold from renewable sources	268	MWh
Total energy consumption (MWh)		201 816	MWh
Energy performance on revenue basis (energy intensity)*		158,4	MWh/ mil.EUR

*The energy intensity is based on net consolidated revenues of €1,274.4 million (see Elevion's Annual Report 2024, p. 71), divided by total energy consumption.



Energy produced

Energy	Produce (MWh)
Renewable	127 656 MWh
Non-renewable	61 275 MWh

Energy Consumption

- In 2024, Elevion consumed **201 816 MWh** of energy, of which **48% was from fossil fuel sources** and **52% from renewables**.
- Elevion significantly expanded its use of **self-produced renewable electricity**, which now accounts for 2 562 MWh. This includes energy generated from solar PV.
- Entract (or other entities) **purchase energy for resale** to customers under ESCO contracts. These volumes are **excluded from Elevion's own energy consumption and Scope 2 emissions**.

Energy Production

- Elevion produced **127 656 MWh of renewable energy** and **61 275 MWh of non-renewable energy** in 2024.
- The majority of renewable production stems from **solar PV and biogas plants**, with a portion used for **self-consumption** and the rest **exported to the grid or clients**.
- Non-renewable production is primarily from **cogeneration units** operated under ESCO contracts, which, while increasing Scope 1 emissions, offer **higher energy efficiency** and **net carbon savings** for clients.

Activities in High Climate Impact Sectors

Elevion Group operates in sectors classified as high climate impact under ESRS, primarily:

- **Construction and technical building services** (HVAC, electrical installations, industrial automation)
- **Energy generation and management** (including cogeneration units, biogas/biomethane plants, and photovoltaic systems)

These activities involve significant energy use for heating, cooling, and generating electricity, which directly influences Elevion's energy mix and GHG profile. While cogeneration and biogas plants increase Scope 1 emissions, they also deliver efficiency gains and enable renewable energy integration for customers. Elevion's strategy prioritises reducing fossil fuel dependency and expanding renewable energy deployment to mitigate climate impact. For the purposes of regulatory and sustainability reporting, all activities undertaken by the Elevion Group are currently assumed to fall under the category of high climate impact. At present, the Elevion Group does not possess the capability to reliably distinguish between activities classified as high climate impact and those that are not.

DISCLOSURE REQUIREMENT E1-6 –
GROSS SCOPES 1, 2, 3
AND TOTAL GHG EMISSIONS

1. GHG Calculation Methodology

a) Standards and Guidance Applied

The GHG inventory was prepared in accordance with ESRS E1 and in it is based on the **GHG Protocol Corporate Accounting and Reporting Standard**, including:

- *GHG Protocol: Revised edition of the Corporate Accounting and Reporting Standard*
- *GHG Protocol: Scope 2 Guidance*

These standards ensure consistency with internationally recognised methodologies for Scope 1 and Scope 2 emissions.

b) Methodology, Estimates, and Assumptions

- **Organisational Boundary:** Operational control approach applied to all Elevion-owned and operated assets.
- **Scopes:**
 - *Scope 1:* Direct emissions from stationary combustion, fleet, and fugitive emissions.
 - *Scope 2:* Indirect emissions from purchased electricity, heat, cooling, and steam (location-based and market-based).
- **Activity Data Sources:** Internal metering, invoices, ERP data, and supplier disclosures.
- **Emission Factors:**

Type of emissions	Reference
Stationary combustion	DEFRA - UK Government GHG Conversion Factors for Company Reporting (2024)
Vehicle combustion	DEFRA - UK Government GHG Conversion Factors for Company Reporting (2024)
Electric vehicles	AIB European Residual and Production Mixes (AIB 2024)
Purchased electricity	AIB European Residual and Production Mixes (AIB 2024)
Purchased heat	DEFRA - UK Government GHG Conversion Factors for Company Reporting (2024)

- **Estimation Methods:** Applied where direct data unavailable (e.g. average fuel consumption for hybrid vehicles based on ICCT/WLTP benchmarks).
- **Assumptions:**
 - Biofuel blends included in DEFRA factors.

c) GHGs Included

All **seven Kyoto Protocol gases** were considered: CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, and NF₃. Where emission factors did not provide a gas split, emissions were reported under “unavailable split” category.

d) Global Warming Potentials (GWPs)

GWPs applied are based on **IPCC AR6 (100-year time horizon)** to ensure alignment with the latest climate science.

2. Overview of GHG emissions

Gross greenhouse gas emissions (in tCO₂e) 2024

Scope 1 GHG emissions	
Gross Scope 1 GHG emissions (tCO ₂ eq)	18505
Scope 2 GHG emissions	
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)	2108
Gross market-based Scope 2 GHG emissions (tCO ₂ eq)	3760
Total GHG emissions (location based) (tCO₂eq)	20613
Total GHG emissions (market based) (tCO₂eq)	22265

- As disclosed under **ESRS E1-4 – Targets related to climate change mitigation and adaptation**, Elevion Group has revised its climate transition plan, associated strategy, and emissions reduction targets. The previously communicated target in the **2023 ESG Report**—a **43% reduction in Scope 1 and Scope 2 emissions by 2035**—has been fully withdrawn following the reassessment of baseline data and methodological improvements.
- Starting from the **2024 reporting year**, Elevion Group has established a **new Scope 2 baseline**, which reflects updated operational boundaries and enhanced data quality. Based on this new baseline, the Group has set an updated target to **reduce Scope 2 emissions by 50% by 2035**.
- There is **no change to the Group's long-term commitment for 2040**. Elevion Group remains fully committed to achieving **carbon neutrality across Scope 1 and Scope 2 emissions by 2040**, in line with its strategic climate objectives and obligations under ESRS E1.
- The Group does not have any material investees such as associates, joint ventures, or unconsolidated subsidiaries.

2.1. Scope 1 Emissions

Scope 1 emissions represent direct GHG emissions from sources owned or controlled by Elevion Group. In 2024, the majority of Scope 1 emissions originated from CHP unit operated by Entract Energy GmbH. Elevion Group also operates large scale cogeneration units across four sites in Northern Italy under tolling based agreement where customer procures the fuel (natural gas) i.e., Project X S.r.L. includes **seven high-efficiency CHP plants** with an aggregate capacity of approximately **26 MW**. These plants supply electricity and heat to the **Transalpine Pipeline (TAL)** infrastructure. Emissions from Project X are excluded from scope 1 based on the responsibilities defined under the tolling agreement and communication with the stakeholders involved. The emissions from these CHP units will be consolidated under scope 3 in the future reporting cycles. Biogenic emissions from assets in Italy; N₂O (Nitrous Oxide) and CH₄ (Methane) i.e., 23 tCO₂e are excluded from consolidated Scope 1 emissions due to their insignificance, accounting for just 0.026% of the total. However group is committed to monitor and disclose separately to ensure transparency due to nature of business in Italy.

Category	2024 tCO ₂ e
Refrigerants and other fugitive greenhouse gas emissions	-
Stationary combustion	11,600
Vehicles combustion	6,905
Total	18 505

In fact, Elevion’s **decarbonisation strategy** anticipates such short-term increases as the Group takes over existing fossil-based assets with the aim of **reducing their emissions over time**. These units are targeted for future replacement with **heat pumps** or conversion to **biomethane**, ensuring that Elevion does not create new emissions but rather assumes responsibility for existing ones to accelerate their decarbonisation.

Scope 1 also includes:

- **Fleet emissions** from business use of company vehicles (delivery and passenger).
- **Stationary combustion** in cogeneration and heating assets.

Private use of company vehicles was estimated and categorised under **Scope 3**, consistent with the ownership and usage logic embedded in Elevion’s methodology. Elevion Group does not report emissions under the Emissions Trading System (ETS). This is because the Group’s operations currently fall outside the scope of installations subject to ETS reporting requirements. Accordingly, ETS emissions are not applicable to Elevion Group’s greenhouse gas (GHG) disclosures.

2.2. Scope 2 Emissions

Scope 2 emissions cover purchased electricity (including onsite charging of electrical cars), heat, steam, and cooling. The **location-based method** uses national grid average emission factors, while the **market-based method** applies residual mix factors.

Category	tCO ₂ e	tCO ₂ e
	Location-based	Market-based
Electric vehicles (EVs) and plug-in hybrid electric vehicles (PHEVs)	118	133
Purchased electricity	1613	3 250
Purchased heat	377	377
Purchased cooling	-	-
Purchased steam	-	-
Total	2 108	3 760

2.3. Scope 3 Emissions Disclosure

Elevion Group is currently developing its Scope 3 inventory, including categories such as:

- **Private use of company vehicles**
- **Purchased goods and services**
- **Business travel and commuting**
- **Use of sold products and end-of-life treatment**

Scope 3 quantification is not yet available. However Elevion Group is currently working on quantifying relevant categories of scope -3 and is committed to disclosing them in future reporting cycles.

2.4. Assumptions and Data Quality

- **Emission factors** were selected based on reporting year and activity type, with fallback logic applied where necessary.
- **Operational control** was used to define boundaries, consistent with ESRS and GHG Protocol.
- **Biogenic emissions** were excluded from Scope 1 totals but disclosed separately.
- **Electricity and cooling emissions** were calculated using both location-based and market-based methods, with country-specific EF prioritisation.
- **No offsets or removals** were applied to gross emissions in this disclosure.
- Private use of business vehicles was estimated and will be included in Scope 3 once full data is available.

2.5. Biogenic Emissions

Biogenic emissions arise from the combustion of biogas within Elevion Group’s operational boundary, primarily at renewable energy assets operated in Italy. The biogas is produced from agricultural by-products and animal droppings. In accordance with ESRS guidance, biogenic emissions are reported separately below.

Gross greenhouse gas emissions (in tCO ₂ e) 2024	
Biogenic emissions (tCO ₂ eq)	20140

2.6. GHG Emissions Intensity

In 2024, Elevion Group’s gross GHG emissions (Scopes 1 and 2, market-based) amounted to **22,265 tCO₂e**. Based on net consolidated revenues of **€1,274.4 million** (see Elevion’s Annual Report 2024, p. 71), GHG intensity in **tCO₂e per €1,000 of revenue** is calculated below.

GHG intensity per net revenue	Total Emissions (tCO ₂ e)	GHG Intensity (tCO ₂ e) per €1,000 of revenue
Total GHG emissions (market -based) per net revenue	22,265	0.0175
Total GHG emissions (location -based) per net revenue	20,613	0.0162

DISCLOSURE REQUIREMENT E1-9 – ANTICIPATED FINANCIAL EFFECTS FROM MATERIAL PHYSICAL AND TRANSITION RISKS AND POTENTIAL CLIMATE-RELATED OPPORTUNITIES

Elevion Group currently discloses qualitative and estimated financial effects under E1-9. Full quantification and integration into financial planning models are under development and will be expanded in future reporting cycles.

Physical Risk: Flooding and Drought Impacting Biomass Supply for Biogas Plants

Elevion Group operates biogas plants in Italy that rely on agricultural biomass sourced from surrounding fields. These operations are exposed to **material physical risks** under both the RCP 4.5 and RCP 8.5 climate scenarios, which projects increased precipitation

variability and longer dry spells in Southern Europe. In line with ESRS SBM-3 requirements, RCP 8.5 was used to reflect worst-case conditions. The analysis was conducted using a high-resolution regional climate risk model integrating geographical hazard mapping and sectoral vulnerability.

- **Flooding Risk:**

Under RCP 8.5, more frequent and intense rainfall events increase the likelihood of **flooding in biomass cultivation areas**, potentially disrupting feedstock supply. While the biogas plants themselves are insured against direct flood damage, the **indirect financial impact** includes:

- Increased costs from sourcing biomass externally.
- Reduced biogas output and associated revenue loss.
- Potential contractual penalties or delivery shortfalls.

- **Drought Risk:**

RCP 8.5 also projects **higher evapotranspiration and reduced water availability**, leading to **lower biomass yields** and increased irrigation costs. This poses a risk to feedstock continuity and price stability.

- **Estimated Financial Exposure:**

Under the **RCP 8.5 climate scenario**, Northern Italy is projected to experience an **increase in drought frequency and severity**, alongside **more variable precipitation patterns**, particularly affecting agricultural productivity and biomass availability.

- Recent studies show that:

- **Extreme drought events** in Northern Italy may increase from **3–5 to 5–8 per decade** by 2050.
- **Evapotranspiration anomalies** are the main trigger for droughts, with **Alpine meltwater reduction** further stressing irrigation systems.
- **Flooding risk** remains moderate but may intensify due to seasonal shifts and snowpack variability.

- For Elevion Group, the **combined impact of drought and flooding** on biomass supply is estimated to affect **10–15% of biogas-related revenue annually** with a **moderate likelihood (40–60%)** over the **2025–2030** horizon. These figures are based on regional climate models and sector-wide assessments of agricultural vulnerability in Northern Italy (and not quantified under RCP 8.5 scenario).

- **Mitigation Measures:**

Elevion is exploring feedstock diversification, long-term supplier contracts, and strategic storage to reduce vulnerability. Insurance coverage for direct asset damage is in place, but supply chain risks remain partially uncovered.

Transitional Risk: Regulatory Uncertainty Affecting Renewable Energy Investment Viability

Elevion Group's decarbonisation strategy relies on long-term investments in renewable energy technologies, including photovoltaic (PV) plants, battery energy storage systems (BESS), and hydrogen infrastructure. These investments are supported by EU and national-level incentives such as feed-in tariffs, PPAs, and grants. However, **regulatory uncertainty**—including changes to subsidy schemes, permitting frameworks, and market access rules—poses a material transitional risk.

Risk Description

Under the evolving EU energy policy landscape, including the **Clean Industrial Deal** and revisions to the **Renewable Energy Directive (RED II)**, member states may adjust support mechanisms for renewables. This could:

- Alter the financial viability of new projects.
- Delay investment decisions due to unclear or shifting rules.
- Trigger renegotiation of existing contracts or reduce investor confidence.

Estimated Financial Exposure

Regulatory uncertainty is estimated to affect **5–10% of renewable energy investment value annually**, with a **moderate likelihood (40–60%)** over the **2025–2030** horizon. This reflects:

- The EU's ongoing policy evolution under the Green Deal and Fit-for-55 package.
- Delays in permitting and grid access reforms.
- Divergent implementation across member states.

Mitigation Measures

Elevion is addressing this risk through:

- **Diversified investment portfolio** across multiple EU jurisdictions.
- **Legal and regulatory monitoring** to anticipate changes and adapt project structures.
- **Use of long-term PPAs and bankable contracts** to reduce exposure to policy shifts.
- **Active engagement with industry associations and regulators** to support stable frameworks.

These measures aim to preserve investment certainty, reduce exposure to retroactive changes, and ensure continued alignment with EU climate goals.

Transitional Risk: Technology Integration Risk Affecting Deployment of AI, BESS, and Hydrogen Solutions

Elevion Group is actively investing in advanced technologies such as AI-supported energy platforms (e.g. Elevion Green), digital assistants (e.g. Elevi), battery energy storage systems (BESS), and modular infrastructure for hydrogen and synthetic fuels. These initiatives are central to Elevion's decarbonisation strategy and long-term competitiveness. However, they also expose the Group to material transitional risks related to technology integration.

Risk Description

Due to the complexity and novelty of these technologies, Elevion faces potential cost overruns, implementation delays, and interoperability challenges across its diverse subsidiaries and markets. These risks are particularly relevant in projects involving cross-entity coordination, legacy system upgrades, and regulatory compliance for emerging technologies.

Estimated Financial Exposure

Industry benchmarks suggest that **technology integration risks**—especially those related to AI platforms, battery energy storage systems (BESS), and hydrogen infrastructure – can impact **5–10% of innovation-related CAPEX annually**. This range reflects typical cost overruns, delays, and system compatibility issues observed in large-scale deployments of emerging technologies in the energy sector.

While the financial exposure is material, the **likelihood of significant disruption** is considered **moderate**, with an estimated probability of **30–50%** over the **medium-term horizon (2025–2030)**. This reflects:

- The evolving maturity of AI and BESS technologies
- Increasing regulatory complexity
- Cross-entity coordination challenges in decentralised energy groups

Mitigation Measures:

Elevion is addressing these risks through:

- **Pilot programmes** to validate new technologies before full-scale deployment.
- **Cross-entity governance structures** to ensure alignment and knowledge sharing.
- **Dedicated innovation budget** and phased investment planning.
- **Strategic partnerships** with technology providers and research institutions.

These measures aim to reduce implementation friction, enhance scalability, and ensure that Elevion's innovation efforts translate into measurable climate and financial benefits.

Transitional Risk: Market Risk from Energy Price Volatility Affecting ESCO and Merchant Battery Revenues

Elevion Group delivers energy efficiency and renewable energy solutions under long-term ESCO contracts across multiple European markets. These contracts often include performance guarantees and fixed pricing structures, which expose Elevion to market risk arising from energy price volatility during the transition to a low-carbon economy.

In addition, Elevion is preparing to invest in **battery energy storage systems (BESS)** that will operate under **merchant models**, relying on wholesale market arbitrage and ancillary services. Unlike feed-in tariff or PPA-backed photovoltaic assets, merchant BESS revenues are directly exposed to intraday price spreads, balancing market saturation, and trading performance.

Risk Description:

Under the evolving EU energy market dynamics:

- **Volatile electricity and gas prices** may reduce the financial attractiveness of PV, BESS, and heat pump investments for clients.
- This can lead to **delayed project decisions, contract renegotiations, or reduced ESCO demand**.
- For merchant BESS, **price spread compression, regulatory shifts, or trader underperformance** may directly impact revenue and asset profitability.

These risks are particularly relevant in markets with **limited grid flexibility, regulatory uncertainty, or high renewable penetration**.

- **Estimated Financial Exposure:**
ESCO-related revenue is estimated to be exposed to **5–10% annual volatility**, with a **moderate likelihood (40–60%)** over the **2025–2030** horizon. This reflects the stabilising effect of flexible pricing models, bundled offerings, and geographic diversification across regulated and liberalized markets.
- **Merchant BESS revenue** may be impacted by **10–20% annually**, also with a **moderate likelihood (40–60%)**, assuming Elevion continues to utilise professional trading partners, deploy assets in diversified markets, and phase investments to manage exposure
- These estimates are based on benchmarks from **Aurora Energy Research, IEA, and Fitch Ratings**, reflecting observed volatility in European energy markets and battery storage economics.

Mitigation Measures:

Elevion is addressing this risk through:

- **Flexible pricing models** that allow for indexation or shared savings structures.

- **Bundled service offerings** combining PV, BESS, and energy management to enhance ROI.
- **Trader partnerships** and performance monitoring for merchant BESS optimisation.
- **Geographic diversification** to balance exposure across regulated and liberalized markets.
- **Client advisory support** to navigate energy market uncertainty and regulatory changes.
- These measures aim to preserve contract profitability, ensure merchant asset viability, and support Elevion's decarbonisation growth strategy.

Climate-Related Opportunity: Expansion of ESCO Services in Response to Decarbonisation Demands

Elevion Group is experiencing growing demand for energy performance contracting (ESCO) services as clients across Europe seek cost-effective pathways to decarbonisation. This trend is driven by rising energy prices, regulatory pressure, and corporate net-zero commitments, positioning Elevion's ESCO model as a strategic enabler of climate action.

Opportunity Description:

ESCO services offer clients guaranteed energy savings, reduced emissions, and improved operational efficiency without upfront capital investment. Elevion's integrated ESCO offering—combining engineering, financing, digital monitoring, and long-term maintenance—addresses both climate mitigation and adaptation needs. The opportunity is particularly strong in industrial, municipal, and commercial sectors facing regulatory deadlines or ESG reporting obligations.

Estimated Financial Potential:

The expansion of ESCO services is estimated to contribute up to **15% of Elevion's recurring revenue growth**, with a **high likelihood (60–80%)** over the **medium-term horizon (2025–2030)**. These estimates are based on client pipeline data, market forecasts, and historical contract performance.

Strategic Measures to Capture Opportunity:

Elevion is scaling its ESCO business through:

- **Bundled solutions** integrating PV, BESS, heat pumps, and energy management systems.
- **Flexible contract structures** tailored to local regulations and client needs.
- **Cross-border replication** of successful ESCO models in new markets.

These initiatives support Elevion's long-term growth strategy, reinforce its climate leadership, and provide stable, performance-linked revenue streams.

Climate-Related Opportunity: Digital Energy Platforms Enabling Scalable B2B Services

Elevion Group is leveraging digital innovation to scale its energy services and enhance client engagement through platforms such as Elevion Green or Automation & Digital segment. These tools support the Group's transition to a climate-neutral economy by enabling efficient deployment, monitoring, and optimisation of decentralised energy systems.

Opportunity Description:

As clients increasingly seek data-driven solutions to manage energy consumption, emissions, and regulatory compliance, Elevion's digital

platforms offer a scalable and customisable interface for B2B energy services. Elevion Green provides centralised access to ESCO offerings, PV and BESS solutions, and performance analytics. These platforms are particularly valuable in fragmented markets where digitalisation accelerates project execution and improves transparency.

Estimated Financial Potential:

The financial upside from digital energy platforms is estimated to contribute up to **10% of Elevion's innovation-related revenue annually**, with a **high likelihood (60–80%)** over the **medium-term horizon (2025–2030)**. These estimates are based on current business plan of the Elevion Group in digital energy services.

Strategic Measures to Capture Opportunity:

Elevion is actively scaling its digital platform strategy through:

- **SaaS-based offerings** for energy monitoring, reporting, and optimisation.
- **Integration of Elevion Green** across subsidiaries to unify client access.
- **AI-driven support tools** to enhance client onboarding and solution design.
- **Data analytics capabilities** to support ESG reporting and performance benchmarking.

These initiatives are expected to generate new revenue streams, improve client retention, and reinforce Elevion's position as a digital-first energy partner in the climate transition.

Climate-Related Opportunity: Biomethane and Alternative Fuels Supporting Long-Term Decarbonisation

Elevion Group is actively exploring the production and integration of **biomethane** and other low-emission fuels (e.g. hydrogen, synthetic fuels) as part of its long-term decarbonisation strategy. These efforts are aligned with EU climate targets and benefit from regulatory incentives for renewable gas production and grid injection.

Opportunity Description:

Biomethane offers a scalable and sustainable substitute for natural gas in heating and cogeneration applications, particularly in industrial and municipal sectors. Elevion's existing biogas infrastructure provides a foundation for upgrading to biomethane, enabling continuity of service while reducing Scope 1 emissions. EU support

schemes, including feed-in tariffs and green gas certificates, further enhance the financial viability of these projects.

Estimated Financial Potential:

The opportunity from biomethane and alternative fuels is estimated to contribute up to **2% of Elevion's projected revenues annually**, with a **medium to high likelihood (60–80%)** over the **medium-term horizon (2025–2035)**. These estimates are based on the current business plan of the Elevion Group.

Strategic Measures to Capture Opportunity:

Elevion is pursuing this opportunity through:

- **Upgrading biogas plants** to biomethane production and grid injection.
- **Exploring hydrogen and synthetic fuel pathways** for future fuel substitution.
- **Integrating low-emission fuels** into ESCO contracts and client energy systems.
- **Engaging with regulators and industry partners** to shape market access and certification frameworks.

These initiatives support Elevion's transition away from fossil fuels, diversify its energy portfolio, and position the Group as a provider of next-generation clean energy solutions.



ESRS E3 WATER AND MARINE RESOURCES



STRATEGY

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Water is not a core operational input across Elevion Group, but it plays a strategic role in selected subsidiaries, particularly in Italy and Germany. The Group's business model includes water treatment infrastructure and innovative solutions such as **floating photovoltaic (PV) systems**, which offer land-efficient renewable energy while contributing to water stewardship and climate adaptation. In rented facilities, water systems are typically managed by landlords, limiting Elevion's direct control over consumption and discharge. To address this, Elevion applies standardised estimation methods and engages with landlords to improve transparency. These activities reflect Elevion's broader commitment to sustainable infrastructure and position water-related services as both a risk and an opportunity within its value chain.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

Stakeholder views on water-related topics were considered during Elevion Group's materiality assessment, particularly in relation to operational relevance, regulatory exposure, and environmental stewardship. Feedback from municipalities, customers, and public authorities highlighted the importance of water infrastructure and climate adaptation. In response, Elevion expanded its role in water and wastewater treatment projects and introduced floating photovoltaic (PV) systems that combine renewable energy generation with water surface utilisation. These initiatives reflect stakeholder expectations for sustainable infrastructure and reinforce Elevion's positioning as a solution provider in water-sensitive regions.



IMPACT, RISK AND OPPORTUNITY MANAGEMENT

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 IRO-1 – DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL WATER AND MARINE RESOURCES- RELATED IMPACTS, RISKS AND OPPORTUNITIES

Elevion Group identified and assessed material water-related impacts, risks, and opportunities through its Double Materiality Assessment (DMA) process conducted in 2024. The process included internal workshops led by the group ESG Manager and involved representatives from all entities across the Group. Water-related topics were screened based on operational relevance, regulatory exposure, and stakeholder feedback. For entities lacking direct water data, consumption and discharge were estimated using headcount-based coefficients derived from reference companies and Eurostat-supported studies. The assessment considered both direct operations and indirect exposure through rented facilities, where water management is typically under landlord control. Materiality was determined using financial thresholds and qualitative criteria, with particular attention to operations in water-stressed regions. The results informed Elevion's Environmental Policy (Annex 2 – Water Management) and guided the development of water-related actions and disclosures under ESRS E3.

In addition to operational water use, Elevion identified strategic opportunities linked to water stewardship, including floating photovoltaic (PV) systems and water/wastewater treatment infrastructure. These initiatives not only mitigate environmental impacts but also position Elevion as a solution provider in climate adaptation and land-efficient renewable energy.

DISCLOSURE REQUIREMENT E3-1 – POLICIES RELATED TO WATER AND MARINE RESOURCES

The Elevion Group acknowledges the critical significance of sustainable water management. We are dedicated to employing responsible water usage and conservation practices throughout all our operations to safeguard this invaluable natural resource, ensuring its availability for future generations.

Our Environmental Policy encompasses the assessment, monitoring, and optimisation of water usage, alongside addressing water-related risks and impacts. This set of principles is designed to establish a clear framework for the effective and responsible management of water resources within Elevion Group's operations.

To uphold our commitment to sustainable water management, Elevion Group adheres to a series of strategic principles that are integrated within our Environmental Policy.

No policy has been adopted regarding sustainable oceans and seas, as Elevion's operations are not materially linked to marine environments.

DISCLOSURE REQUIREMENT E3-2 – ACTIONS AND RESOURCES RELATED TO WATER AND MARINE RESOURCES

Most Elevion Group entities operate in rented properties, where water infrastructure is managed by landlords. Despite this limitation, Elevion has implemented a series of water-related actions across its operations, guided by its Environmental Policy (Annex 2 – Water Management) and ESG priorities.

Beyond internal water-saving measures, Elevion is leveraging its engineering capabilities to deliver external water-related solutions. These include turnkey floating PV systems that reduce land use and water evaporation, and advanced water and wastewater treatment projects that enhance climate resilience and regulatory compliance for clients.

Water Use Efficiency:

Several subsidiaries have installed water-saving fixtures such as taps with air mixers and photocells. These measures aim to reduce consumption in office environments and industrial sites.

Water Conservation and Awareness:

Employees are encouraged to adopt responsible water use practices through internal communications and facility-level signage.

Water Recycling and Reuse:

While recycling is limited due to infrastructure constraints, Elevion is exploring reuse opportunities in industrial subsidiaries with higher water intensity.

Water Quality Management:

Subsidiaries are required to comply with local discharge regulations. Where applicable, wastewater is treated before discharge to third parties.

Risk Assessment and Mitigation:

Water-related risks, including exposure to water-stressed regions and regulatory constraints, were assessed during the 2024 Double Materiality Assessment. These risks informed the prioritisation of water-saving actions.

Resources and Timeframes:

Implementation of water-related actions is ongoing across Elevion's directly controlled sites, with further expansion subject to landlord cooperation and infrastructure feasibility. Progress is monitored through ESG reporting tools and local facility budgets.

METRICS AND TARGETS

DISCLOSURE REQUIREMENT E3-3 – TARGETS RELATED TO WATER AND MARINE RESOURCES

Elevion Group has not yet adopted formal, time-bound targets related to water and marine resources. However, the Group acknowledges the importance of setting measurable goals to improve water efficiency, reduce consumption, and ensure compliance with discharge regulations. As part of its Environmental Policy, Elevion is committed to developing water-related targets by 2026, aligned with operational realities and infrastructure constraints, particularly in rented facilities.

Preliminary internal discussions have identified the following potential target areas:

- Reduction of water consumption per employee across office-based entities.
- Increased installation of water-saving fixtures (e.g. taps with air mixers, photocells).
- Improved tracking of water discharge volumes and quality compliance.
- Explore target-setting for external water-related solutions, such as the number of floating PV MWp installed on water bodies or volume of treated water delivered through Elevion projects.

Target-setting will be informed by historical consumption data, Eurostat benchmarks, and stakeholder expectations. Progress will be monitored through ESG reporting tools and reviewed annually by the ESG Steering Committee.

DISCLOSURE REQUIREMENT E3-4 – WATER CONSUMPTION

	Reported amount
Total water withdrawal (m³)	22121 m³
Total water consumption (m³)	3384 m³
Total water discharge (m³)*	18737 m³
Total water consumption in the areas of high water stress (%)	17%
Total water recycled and reused**	0
Total water stored***	0
Water intensity (Total water consumption in m³ / Revenue mil. EUR)	2.66 m³/mil. Eur

* Water discharge is estimated as 80% of water withdrawal for office companies and 85% of water withdrawal for companies with sites. These coefficients are based on EUCalc study (https://www.european-calculator.eu/wp-content/uploads/2019/09/EUCalc_Water_documentation.pdf)

** Elevion Group does not currently report consolidated quantitative metrics on water recycled and reused due to infrastructure limitations and lack of harmonised data. Reuse opportunities are being explored in selected industrial subsidiaries. The Group plans to develop a methodology for estimating recycled water volumes in future reporting cycles.

*** Elevion Group does not use water storage in its activities. The metrics stated above are not currently validated by any external bodies.

Water consumption in high water stress area

Total water consumption in areas of high water stress represents 17% of Elevion Group’s overall water consumption. Entities located in these areas are not significantly dependent on water for their core business activities or daily operations. Most of these entities operate from rented office spaces, such as Energy Shift B.V. in the Netherlands and HERMOS AG in Germany, where water use is primarily limited to sanitary purposes rather than industrial processes.



Water consumption estimation

Some smaller companies were unable to provide water consumption data. As a result, estimations were necessary. To ensure accuracy, we used reference companies with similar activities and available measured data. Their consumption figures were normalised by dividing total water usage by the headcount, resulting in a per-employee consumption coefficient. This coefficient was then applied to companies lacking data by multiplying it with their respective headcounts to estimate water consumption.

Water Discharge estimation

Water discharge coefficients were also tailored to each group. These coefficients are based on a relevant study supported by Eurostat data.

For companies operating production or industrial sites, water discharge is estimated at 85% of total water withdrawal. For companies with office-only operations, water discharge is estimated at 80% of total water withdrawal.

DISCLOSURE REQUIREMENT E3-5 — ANTICIPATED FINANCIAL EFFECTS FROM MATERIAL WATER AND MARINE RESOURCES-RELATED RISKS AND OPPORTUNITIES

Elevion Group has not yet quantified the financial effects of water-related risks and opportunities under E3-5. These disclosures are subject to phase-in and will be developed in future reporting years.

Water-Related Risk: Limited Control Over Water Systems in Rented Facilities

Elevion Group operates primarily in rented properties across Europe, where water infrastructure—including supply, discharge, and metering—is typically managed by landlords. This operational model presents a material limitation in implementing water efficiency measures, tracking consumption, and ensuring compliance with emerging ESG expectations related to water stewardship.

Risk Description

Due to limited control over water systems, Elevion may face challenges in reducing water consumption, improving discharge quality, or meeting future regulatory or ESG reporting requirements. This constraint affects the Group's ability to implement water-saving technologies, monitor water-related KPIs, and respond to stakeholder demands for transparency and performance.

Estimated Financial Exposure

The financial impact is currently considered **low to moderate**, primarily in the form of **missed efficiency savings, limited ESG rating improvement, and potential reputational risk**. The likelihood of this risk materialising is **medium (40–60%)** over the **medium-term horizon (2025–2030)**, especially if water-related disclosure and performance expectations increase under CSRD or investor scrutiny.

Mitigation Measures

Elevion is addressing this risk by:

- **Engaging with landlords** to improve water transparency and explore joint efficiency initiatives.
- **Installing water-saving fixtures** (e.g. taps with air mixers, photocells) where feasible.
- **Estimating water consumption and discharge** using standardised coefficients to support ESG reporting.
- **Including water-related clauses** in new lease agreements where possible.

These measures aim to improve Elevion's water performance visibility, support ESG compliance, and prepare the Group for evolving stakeholder expectations.

Water-Related Opportunity: Water Efficiency Measures in Office and Industrial Sites

Elevion Group has identified water efficiency as a low-cost, high-impact opportunity across its portfolio, particularly in office-based entities and selected industrial subsidiaries. While water infrastructure is largely managed by landlords, Elevion has implemented and continues to expand measures that reduce water consumption and promote responsible usage.

Opportunity Description:

Smart water fixtures such as taps with air mixers and photocells have already been installed in several locations, contributing to reduced water use without compromising functionality. These measures are complemented by employee awareness initiatives and internal guidelines promoting behavioural change. Although the financial savings per site are modest, the opportunity is scalable across Elevion's footprint and supports broader ESG goals.

Estimated Financial Potential:

The financial benefit is considered **marginal per site**, but with a **high likelihood (60–80%)** of realisation across the **short- to medium-term horizon (2025–2030)**. These estimates are based on internal consumption data, normalised usage coefficients, and projected rollout of water-saving technologies.

Strategic Measures to Capture Opportunity:

Elevion is pursuing this opportunity through:

- **Standardising water-efficient fixtures** in directly controlled sites.
- **Engaging landlords** to support upgrades in rented facilities.
- **Tracking consumption** via ESG reporting tools and estimation models.
- **Including water efficiency clauses** in new lease agreements where feasible.

These initiatives contribute to operational cost savings, improved ESG ratings, and alignment with stakeholder expectations for responsible resource management.

Water-Related Opportunity: Floating Photovoltaic Systems as a Land-Efficient and Water-Conscious Solution

Elevion Group has successfully delivered multiple **floating photovoltaic (PV) turnkey solutions** in Israel and is preparing to roll out similar systems in Italy. These installations offer a strategic alternative to ground-mounted PV, particularly in regions where land availability is limited or where water conservation is a priority. Floating PV systems utilise water surfaces such as reservoirs or industrial basins, reducing land use pressure and contributing to reduced water evaporation.



Opportunity Description:

Floating PV enables Elevion to expand its renewable energy portfolio in areas where traditional ground-mounted systems face permitting, biodiversity, or land-use constraints. These systems also align with water stewardship goals by minimising freshwater loss and offering dual-use benefits for clients with water infrastructure.

Estimated Financial Potential:

The financial impact is considered **moderate**, with a **high likelihood (60–80%)** of realisation over the **medium-term horizon (2025–2030)**. These estimates are based on Elevion’s successful deployments in Israel, client interest in Italy, and growing regulatory and market support for land-efficient renewable energy solutions.

Strategic Measures to Capture Opportunity:

Elevion is actively scaling this opportunity through:

- **Turnkey floating PV projects** in water-rich industrial and municipal settings.
- **Integration into ESCO offerings** for clients with reservoirs or basins.
- **Collaboration with local authorities** to identify suitable water surfaces.
- **Inclusion in biodiversity-sensitive project designs** to minimise land impact.

These initiatives reinforce Elevion’s innovation leadership, expand its renewable energy footprint, and contribute to sustainable water and land resource management.

Water-Related Opportunity: Water and Wastewater Treatment Infrastructure Projects

Elevion Group is actively engaged in the design, construction, and modernisation of water and wastewater treatment infrastructure across Austria, Poland, and Germany. Through its subsidiaries,

Elevion delivers turnkey solutions for municipal water treatment stations, sewage treatment plants, and industrial wastewater systems. These projects contribute to climate resilience, water quality improvement, and sustainable resource management.

Opportunity Description:

Elevion’s water treatment capabilities support municipalities and industrial clients in meeting regulatory requirements, improving service reliability, and adapting to climate-related water stress. The Group’s expertise spans filtration systems, aeration technologies, nutrient removal, and emergency water supply solutions.

Estimated Financial Potential:

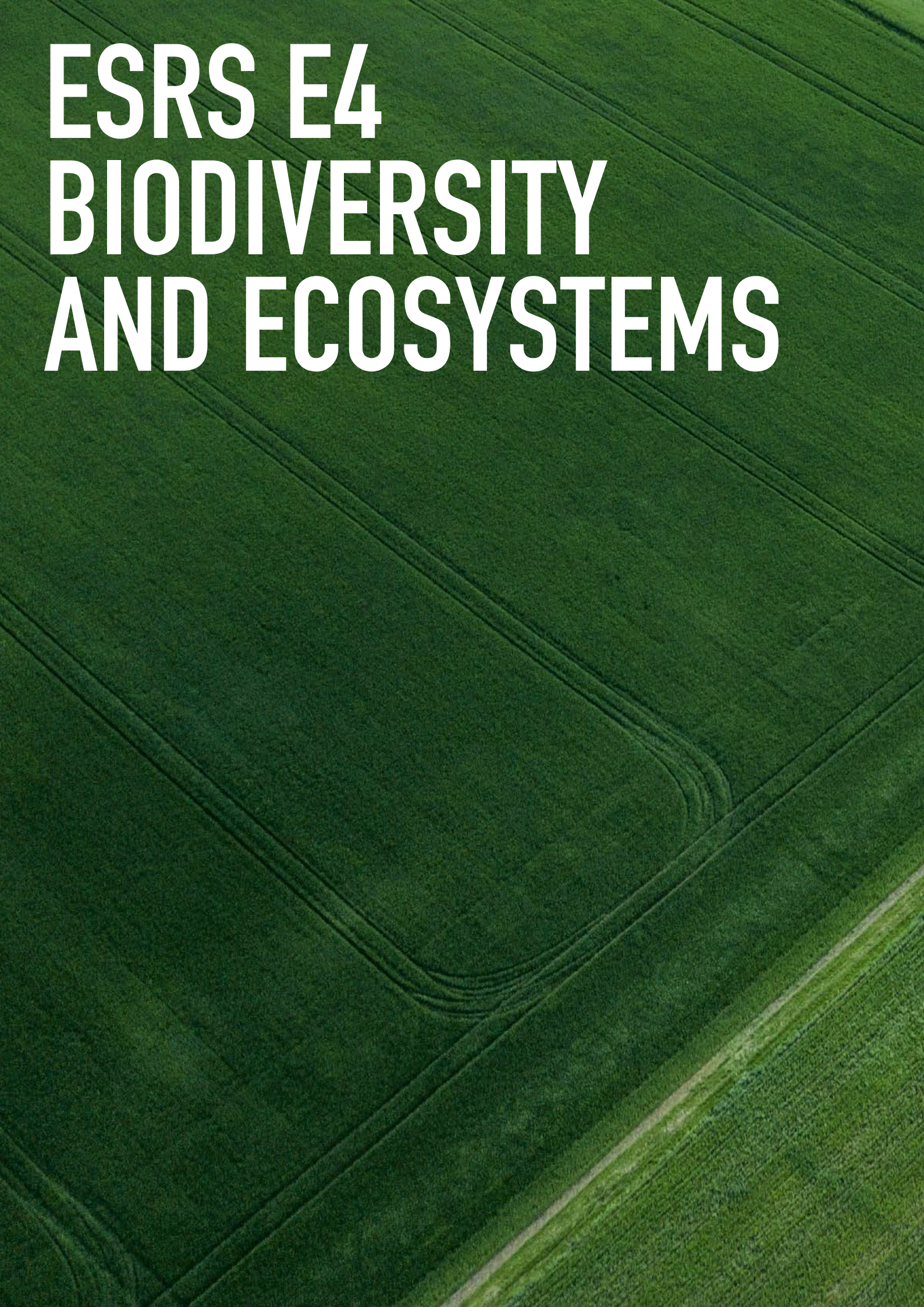
The financial impact is considered **moderate to high**, with a **medium to high likelihood (60–80%)** of realisation over the **medium-term horizon (2025–2030)**. These estimates are based on public tenders won, ongoing projects, and increasing demand for climate-resilient water infrastructure.

Strategic Measures to Capture Opportunity:

Elevion is scaling this opportunity through:

- **Municipal partnerships** for water and sewage infrastructure upgrades.
- **Deployment of advanced treatment technologies** including sequencing batch reactors and pressure filtration.
- **Expansion into new regions** with water stress or infrastructure gaps.

These initiatives reinforce Elevion’s role in climate adaptation, support ESG goals, and contribute to long-term environmental and financial sustainability.

An aerial photograph of a lush green agricultural landscape, showing a grid of fields separated by thin, light-colored lines. The text is overlaid on the top left portion of the image.

ESRS E4 BIODIVERSITY AND ECOSYSTEMS



BASED ON ELEVION GROUP'S DOUBLE MATERIALITY ASSESSMENT, BIODIVERSITY AND ECOSYSTEMS WERE NOT IDENTIFIED AS MATERIAL TOPICS FOR ELEVION'S OWN OPERATIONS.

HOWEVER, BIODIVERSITY REMAINS STRATEGICALLY RELEVANT FOR THE PARENT COMPANY ČEZ AS PART OF VISION 2030, AND ELEVION CONTRIBUTES TO THESE OBJECTIVES THROUGH ITS RENEWABLE ENERGY PROJECTS. FOR EXAMPLE, BELECTRIC'S PV CONSTRUCTION ACTIVITIES ROUTINELY INCLUDE BIODIVERSITY CONSIDERATIONS AS PART OF ENVIRONMENTAL IMPACT ASSESSMENTS (EIA).

THEREFORE, WHILE E4 IS NOT MATERIAL FOR ELEVION UNDER ESRS, WE PROVIDE CONTEXTUAL DISCLOSURES ON BIODIVERSITY INTERACTIONS IN LINE WITH ČEZ GROUP'S SUSTAINABILITY AMBITIONS AND REGULATORY REQUIREMENTS FOR PROJECT DEVELOPMENT.

ESRS 2 – GENERAL DISCLOSURES

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Although biodiversity was not classified as a material topic in Elevion Group's double materiality assessment, the Group acknowledges its strategic relevance in infrastructure development, particularly in large-scale photovoltaic projects. Biodiversity considerations are integrated into project design and execution through regulatory compliance, operational oversight, and voluntary best practices. The ESG Steering Committee, supported by subsidiaries such as Belectric, ensures that construction and maintenance activities—such as land use, mowing, and soil movement—are managed to minimise ecological disruption. These efforts reflect Elevion's broader commitment to responsible environmental stewardship and sustainable infrastructure delivery.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

Elevion Group acknowledges that stakeholder expectations—particularly from municipalities and public authorities—increasingly emphasize responsible land use and ecological safeguards in infrastructure projects. Although no formal stakeholder feedback on biodiversity was received during the reporting cycle, Elevion anticipates that future structured dialogue—planned from 2026 onward—will provide additional insights to guide its approach to ecosystem protection in renewable energy and construction activities.

E4-1 – TRANSITION PLAN AND CONSIDERATION OF BIODIVERSITY AND ECOSYSTEMS IN STRATEGY AND BUSINESS MODEL

Elevion Group does not maintain a formal biodiversity transition plan in accordance with ESRS requirements, as biodiversity was assessed as non-material in the Double Materiality Assessment. However, the Group acknowledges its relevance for ČEZ Vision 2030 and for specific subsidiaries such as Belectric, where biodiversity considerations are integrated into Environmental Impact Assessments for PV projects. Elevion will reassess the need for a formal transition plan in future reporting cycles if biodiversity becomes material. Although, group recognises the importance of considering biodiversity within its broader sustainability approach. The ESG Steering Committee oversees biodiversity-related aspects as part of overall environmental considerations, supported by operational teams within subsidiaries such as Belectric Group. Current activities include:

- **Ensuring adherence to all applicable environmental and biodiversity regulations** in the construction, operation, and maintenance of photovoltaic projects.
- Exploring opportunities to incorporate and share **best practices** that support biodiversity and promote effective biodiversity management and defence across the Elevion Group.
- **Evaluating potential measures** to minimise environmental impacts where feasible.
- **Communicating progress** on biodiversity-related efforts to internal and external stakeholders.

DISCLOSURE REQUIREMENT SBM 3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Biodiversity considerations are increasingly embedded in Elevion Group's business model, particularly in the context of developing and operating large scale photovoltaic projects. While renewable energy generation contributes positively to climate objectives, it can also interact with local ecosystems and habitats, creating both risks and opportunities.

Selected Impacts

- Land use changes associated with solar park development may affect local flora and fauna if not managed appropriately.
- Maintenance practices, such as mowing or mulching, can influence habitat quality and species diversity.
- Construction and maintenance practices, such as mowing or soil movement, can alter habitat quality, fragment ecosystems, and disturb species through noise, vibration or light.
- Project activities may influence soil and water dynamics or generate impacts during material supply phases and decommissioning.

Risks

- Regulatory and permitting risks related to environmental and biodiversity requirements.
- Reputational risks if projects are perceived as negatively impacting ecosystems.
- Potential delays or additional costs due to biodiversity-related mitigation measures.

Opportunities

- Early integration of biodiversity considerations into project evaluation and design offers opportunities to strengthen environmental performance and long-term project sustainability.
- Integration of biodiversity-friendly practices can enhance ecosystem services and stakeholder acceptance.
- Certification schemes (e.g. EULE) and partnerships with scientific institutions can strengthen project credibility and market positioning.
- Creating multifunctional landscapes that combine renewable energy generation with habitat enhancement supports long-term sustainability goals.

Interaction with Strategy and Business Model

Elevion Group's strategy emphasizes sustainable energy solutions. Biodiversity considerations are integrated into project planning and operational practices to reduce negative impacts and identify value-adding opportunities. This includes exploring measures such as habitat creation, adaptive vegetation management, and collaboration with local stakeholders. These actions aim to align renewable energy development with broader environmental stewardship, supporting both regulatory compliance and long-term business resilience.

ESRS 2 IRO-1 – PROCESSES TO IDENTIFY AND ASSESS BIODIVERSITY AND ECOSYSTEM-RELATED IMPACTS, RISKS, DEPENDENCIES AND OPPORTUNITIES

Elevion Group considers biodiversity aspects primarily in the context of developing and operating ground-mounted photovoltaic projects within Belectric Group's activities. The process to identify and assess related impacts, risks, and opportunities includes the following elements:

- **Regulatory and Permitting Review:** Each project undergoes an assessment of applicable environmental and biodiversity regulations to ensure compliance during planning, construction, and operation.
- **Site-Specific Studies and Monitoring:** Where relevant, ecological assessments are carried out, including vegetation and faunal surveys (e.g. birds, reptiles, insects) to understand baseline conditions and potential impacts.
- **Stakeholder Engagement:** Collaboration with local authorities, scientific institutions, and environmental experts helps identify sensitive habitats and species, as well as opportunities for habitat enhancement.
- **Integration into Project Design:** Findings from assessments inform decisions on land management practices, such as mowing regimes, habitat creation, and connectivity measures, to reduce negative impacts and support biodiversity where feasible.
- **Ongoing Review:** Biodiversity-related risks and opportunities are periodically reviewed as part of the ESG governance framework, considering regulatory developments, stakeholder expectations, and emerging best practices.

E4-2 – POLICIES RELATED TO BIODIVERSITY AND ECOSYSTEMS

Elevion Group's approach to biodiversity focuses on:

- **Promoting nature-positive practices** by seeking to avoid, minimise, and, where necessary, compensate for biodiversity impacts.
- Integration of biodiversity in the planning and execution of renewable energy projects.
- Alignment with **EU Taxonomy**, ESRS E4, and **SDG 15 (Life on Land)**.
- Collaboration with scientific institutions, local authorities and communities.

E4-3 – ACTIONS AND RESOURCES RELATED TO BIODIVERSITY AND ECOSYSTEMS

Belectric GmbH (Member of Elevion Group) expert in developing ground mounted PV projects, implemented biodiversity measures in its solar parks, such as:

Key examples of project focussed on Biodiversity

Solarpark Groß Dölln (Germany):

- **Study & Monitoring:**
 - Grasshopper fauna study conducted in the FFH area *Vietmannsdorfer Heide* and adjacent solar park (2021).
 - Methods included semiquantitative transect surveys on 10 permanent plots, visual and acoustic detection, and vegetation structure analysis.
- **Key Findings:**
 - 25 Orthoptera species recorded, including several Red List species.
 - Positive effects of rotational grazing and mowing on habitat heterogeneity.
- **Measures Implemented:**
 - Staggered mowing and reduced mulching.
 - Preservation of sand patches and creation of flower-rich strips.
- **Broader Benefits:**
 - These measures contribute to a more diverse ecosystem, benefiting butterflies, wild bees, and other insects, as well as reptiles such as *Coronella austriaca* and bird species including *Upupa epops* (hoopoe) and *Caprimulgus europaeus* (nightjar).

Solarpark Schweinfurt-Oberndorf (Germany):

- **Assessment:**
 - EULE-certified biodiversity evaluation (2025) by Bachmann Artenschutz GmbH.
- **Habitat Enhancements:**
 - Creation of deadwood piles, stone piles, sand lenses, and hedgerows.

- Barrier-free fencing to improve connectivity for small animals.

- **Target Species:**

- Reptiles (*Lacerta agilis*), bats (*Plecotus auritus*), and birds.

- **Planned Benefits:**

- Improved habitat quality for reptiles and bats.
- Increased insect diversity through extensive grassland management.

- **Recognition:**

- Featured on the **EULE** platform as a best-practice example: <https://eule-energiewende.de/eule-anlagen/>

Solarpark Repperndorf (Germany):

- **Assessment:**

- EULE-certified biodiversity evaluation (2025).

- **Measures Implemented:**

- Extensive grassland management and mosaic mowing.
- Installation of connectivity structures (hedgerows, barrier-free fencing).
- Public engagement through information boards along hiking trails.

- **Target Species:**

- Reptiles (*Coronella austriaca*), bats (*Myotis nattereri*), and birds.

E4-4 – TARGETS RELATED TO BIODIVERSITY AND ECOSYSTEMS

Elevion group is aligned with CEZ vision 2030 to achieve a positive impact on biodiversity by 2030. Further, Belectric Group (member of Elevion Group) already set local targets when it comes to material projects.

Target	Timeline
Aim to maintain or enhance biodiversity outcomes across projects where feasible	2030
Explore opportunities to increase the number of projects recognised for biodiversity good practices	2028

E4-5 – IMPACT METRICS RELATED TO BIODIVERSITY AND ECOSYSTEMS CHANGE

As described in E4-3 actions and resources related to biodiversity and ecosystem, Elevion group is committed to continuously measure the impact with special focus on material subsidiaries or projects.

Metric	Description
Species richness	Number of species recorded per site
Habitat quality indicators	Vegetation cover and presence of characteristic plant species
EULE certification	Benchmark for biodiversity performance
Faunal diversity	Monitoring of bird, reptile, and insect populations

E4-6 – ANTICIPATED FINANCIAL EFFECTS FROM MATERIAL BIODIVERSITY AND ECOSYSTEM-RELATED RISKS AND OPPORTUNITIES

Biodiversity-related risks and opportunities can influence Elevion Group’s financial performance primarily through project development, permitting, and operational phases of photovoltaic installations.

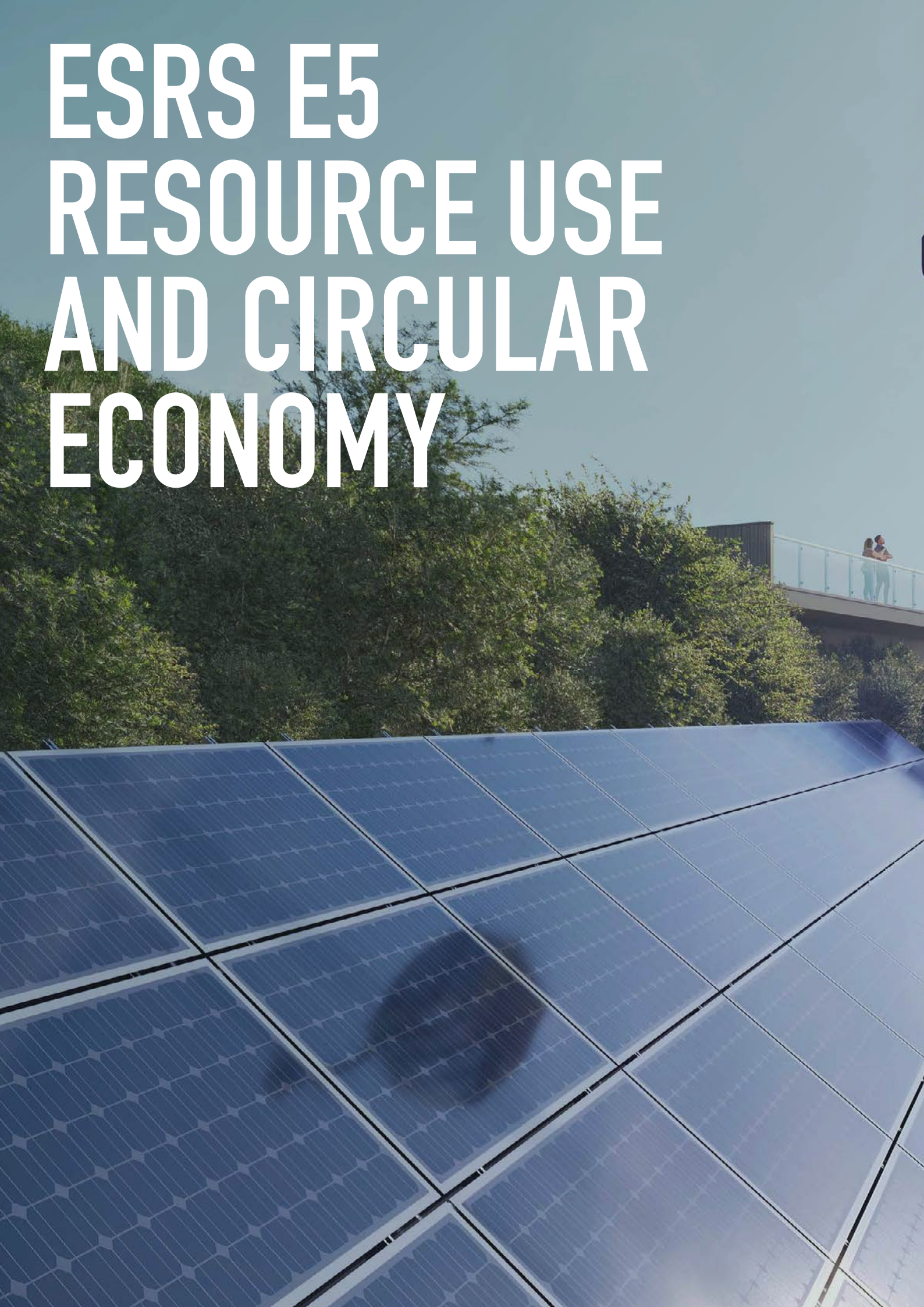
Potential Financial Risks

- **Regulatory Compliance Costs:** Stricter biodiversity and land-use regulations may lead to additional permitting requirements, environmental assessments, and mitigation measures, potentially increasing project timelines and costs.
- **Project Delays:** Identification of sensitive habitats or protected species during planning or construction could result in delays or redesigns, impacting revenue realisation.
- **Reputational Risks:** Negative stakeholder perception regarding biodiversity impacts may affect community acceptance and, indirectly, project viability.

Potential Financial Opportunities

- **Enhanced Market Positioning:** Implementing biodiversity-friendly practices and obtaining certifications (e.g. EULE) can strengthen stakeholder trust, improve brand reputation, support competitive differentiation and strengthen long-term project sustainability
- **Operational Synergies:** Measures such as adaptive vegetation management can reduce long-term maintenance costs while supporting ecological value.
- **Access to Incentives and Partnerships:** Participation in biodiversity initiatives and alignment with sustainability frameworks may facilitate access to impact financing or public funding opportunities.

While it is not currently possible to quantify these effects precisely, Elevion Group monitors regulatory trends, stakeholder expectations, and best practices to anticipate and manage potential financial implications over the medium to long term.



ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY



STRATEGY

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Elevion Group's strategy integrates resource efficiency and circularity into its core business segments, with particular emphasis on biogas, technical building systems, and automation. The Group applies procurement rules that promote traceability, durability, and recyclability of components, and supports closed-loop systems in biogas operations through reuse of agricultural residues and organic waste. Elevion also monitors material flows and waste generation at the building level, and is expanding its internal reporting to better capture resource outflows. These practices are embedded in the Group's environmental policy and contribute to long-term cost efficiency, regulatory alignment, and innovation in sustainable infrastructure.

Elevion Group's strategy is shaped by material risks and opportunities linked to resource flows and circularity, particularly in its biogas and technical services segments. Risks include feedstock volatility in biogas operations due to climate and agricultural conditions, and data limitations in tracking reuse volumes across subsidiaries. Opportunities arise from expanding circular agriculture, reducing virgin material use, and increasing uptake of secondary inputs. These factors influence procurement, project design, and investment planning, and are progressively integrated into Elevion's ESG governance and reporting systems.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

Stakeholder expectations around resource use and circularity are increasingly shaping Elevion Group's sustainability approach. Customers and municipalities have shown growing interest in closed-loop systems, reuse of agricultural residues, and transparent waste management practices. In response, Elevion is exploring ways to make its internal sustainability principles more accessible and is strengthening supplier engagement through ESG criteria in tenders and onboarding. These interactions support the Group's efforts to align procurement and operational practices with stakeholder priorities on circular economy and responsible resource flows.



IMPACT, RISK AND OPPORTUNITY MANAGEMENT

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 IRO-1 – DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL RESOURCE USE AND CIRCULAR ECONOMY-RELATED IMPACTS, RISKS AND OPPORTUNITIES

Elevion Group identified and assessed material impacts, risks, and opportunities related to resource use and circular economy through its **Double Materiality Assessment (DMA)** conducted in 2024. The process was coordinated by the ESG Manager and involved cross-functional workshops with representatives from all major entities across the Group.

The assessment methodology included:

- **Screening of resource-related topics** based on operational relevance, regulatory exposure, and stakeholder expectations.
- **Categorisation of resource flows** into inflows (e.g. raw materials, energy inputs) and outflows (e.g. waste, product end-of-life).
- **Evaluation of circular economy potential**, including reuse, recycling, and lifecycle extension of products and technologies.
- **Use of estimation models** for entities lacking direct data, applying coefficients based on measured data from reference companies and sector benchmarks.
- **Consideration of geographic and operational diversity**, including office-only entities and subsidiaries with industrial operations.

Materiality was determined using both **quantitative thresholds** (e.g. financial exposure, waste volumes) and **qualitative criteria** (e.g. reputational risk, alignment with EU taxonomy and CSRD expectations).

Particular attention was given to:

- Entities producing **hazardous or high-volume waste**.
- Subsidiaries involved in **biomethane production and circular agriculture**, where circularity is fully implemented.
- Opportunities to **reduce virgin material use** and increase uptake of **secondary or renewable inputs**.

The results of the DMA informed Elevion's Environmental Policy (Annexes 3 and 4), guided the development of waste management and product lifecycle actions, and shaped the disclosures under ESRS E5. While Elevion Group actively promotes circular economy principles and waste reduction, certain subsidiaries generate high volumes of waste. The potential negative environmental impacts associated with waste generation were considered during the Double Materiality Assessment and may be reassessed in future reporting cycles to reflect evolving materiality.

DISCLOSURE REQUIREMENT E5-1 – POLICIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

Elevion Group is committed to maintaining high sustainability standards across its services and products. We recognise the importance of protecting both human and natural environments throughout the entire production–consumption–disposal chain. Our Environmental Policy provides a framework for responsible resource use and waste management, with specific guidance outlined in:

- **Annex 3 – Waste Management**
- **Annex 4 – Use and Disposal of Products**

While Elevion does not yet have a group-wide policy specifically targeting the reduction of virgin material use or the sourcing of renewable materials, several subsidiaries have adopted practices aligned with circular economy principles.

These include:

- **Design for sustainability:** Minimising resource consumption and maximizing recyclability from the early stages of product and technology development.
- **Extended product lifespan:** Promoting durability, repairability, and upgradability.
- **Resource-efficient production:** Implementing efficient manufacturing techniques to reduce raw material usage and waste generation.
- **Responsible disposal:** Ensuring proper end-of-life handling of products and technologies.

Elevion's European entities adhere to **Directive 2008/98/EC** on waste and circular economy, including the waste management hierarchy. Globally, most subsidiaries have implemented waste sorting and recycling practices in line with local regulations. These include:

- Separation of recyclable materials (plastics, paper, glass)
- Composting of organic waste
- Use of reusable dishware and refillable containers
- Minimisation of paper use

Hazardous waste is managed in accordance with national legislation and internal procedures. Employees receive regular training, and selected entities (e.g. METROLOG Sp. z o.o.) undergo annual third-party audits.

Elevion also promotes **local sourcing** of materials where feasible, reducing transport-related emissions and supporting sustainable supply chains. Notable examples include Italian biogas subsidiaries (e.g. AxE Agricoltura, DEF S.r.l.), where circularity is significantly implemented—biogas/biomethane is produced from renewable sources and agricultural residues are reused within a closed local loop.

Although the policy is currently internal, Elevion is exploring ways to make key sustainability principles publicly accessible to stakeholders, in response to growing client and partner interest in circular solutions.

DISCLOSURE REQUIREMENT E5-2 — ACTIONS AND RESOURCES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

To uphold our pledge, we adhere to the following principles, which are based on a waste management hierarchy and are in line with our Environmental policy according to Elevion Group's strategy, targets and requested reporting standards.

WASTE MANAGEMENT

1. **Avoidance:** including actions aimed at preventing and reducing the amount of waste generated.
2. **Resource recovery:** including reuse, recycling, reprocessing and energy recovery.
3. **Disposal:** including management of all disposal options in the most environmentally responsible manner.

USE AND DISPOSAL OF PRODUCTS

Life Cycle Assessment:

Conducting life cycle assessments (LCAs) to evaluate the environmental impact of products and technologies, from raw material extraction to disposal.

Energy efficiency:

Minimising energy consumption throughout the entire lifecycle of a product or the delivery of a professional service.

Design for Sustainability:

Integrating sustainability considerations from the early stages in product and technology design. This involves minimising resource consumption, using environmentally friendly materials, and recyclability.

Extended Product Lifespan:

Encouraging the development of products and technologies that have longer lifespans, promoting durability, repairability, and upgradability.

Resource Efficient production processes:

Promoting resource-efficient production processes by implementing efficient manufacturing techniques and technologies, minimising raw material usage, optimising energy and water consumption, and reducing waste generation.

Circular economy:

Designing sustainable products and technologies by incorporating circular economy principles and enabling components or materials to be reused or recycled at the end of their life.

Responsible Disposal:

Ensuring proper practices for our products and technologies that have reached the end of their usable life.

Raw Material Efficiency:

Optimising the use of raw materials, minimising their extraction and consumption, and exploring alternatives or sustainable sourcing options.

Basic Obligations

Member of Elevion Group are expected to count with:

- a. Collecting and delivering transparent and accurate information and data based on given definition and time about the Use and Disposal of Products.
- b. Identifying and implementing sustainable solutions to reduce waste production and enhance waste recycle in its operational offices and facilities.

All our European entities adhere to the principles and policies that regulate waste management, particularly Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives.

This directive outlines the principles of waste management and the circular economy, which our European entities have fully adopted, including the waste management hierarchy.

Waste management is conducted not only across our European offices and sites, in accordance with the waste management hierarchy outlined by the European directive, but also on a global scale. Almost all our companies have implemented solutions to sort waste produced in offices and workplaces, adhering to local standards introduced by public authorities. Worldwide, recyclable materials such as plastics, paper, and glass are separated and sent to external companies for recycling. We have also adopted the less common practice of separating organic waste, which is then composted at external facilities. Additionally, our companies have taken some measures to reduce waste, including using reusable dishware, refillable bottles, and minimising paper use through effective waste separation practices.

Hazardous Waste

All companies producing hazardous waste manage its disposal in accordance with the legislation of their specific countries. In the European Union, hazardous waste is managed according to Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008. Companies also adhere to additional internal regulations that implement national legislative obligations and assist employees in classifying, handling, and storing hazardous waste until disposal. Procedures are in place to prevent hazardous waste from mingling with non-hazardous waste. To ensure compliance, employees undergo regular training and, once a year, the companies METROLOG Sp. z o.o. and EAB Elektroanlagenbau GmbH Rhein/Main are subject to audits of hazardous and municipal waste management conducted by external or third parties.

Circular Economy Principles

Elevion Group is committed to implementing a robust material management approach that prioritises sustainability, regulatory compliance, and responsible sourcing. Elevion Group prioritises the use of locally sourced materials whenever feasible. This approach aims to minimise the environmental footprint associated with transportation and support sustainable supply chains. Key inputs include the various components necessary for operations.

Elevion Group is dedicated to incorporating sustainability into its material selection processes.

Good practices can be found in companies such as Budrio G.F.E 312 Societa Agricola S.r.l., AxE Agricoltura per L'energia Societa' Agricola A.R.L., Societa' Agricola DEF S.r.l., and Societa Agricola B.T.C S.r.l., where the principles of circular economy are fully implemented, as crops and residues from biomethane production are 100% reused within a single local supply chain. The biomethane itself is produced from sustainable renewable sources in accordance with the taxonomy, which contributes to circularity and supports the production of sustainable renewable fuels and, subsequently, energy.



METRICS AND TARGETS

DISCLOSURE REQUIREMENT E5-3 – TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

Elevion Group has not yet adopted formal, measurable, and time-bound targets at Group level related to resource use and circular economy. However, several subsidiaries have initiated local actions and certifications that align with circular principles. For example, **ETS Efficient Technical Solutions GmbH, Rudolf Fritz GmbH, EAB Elektroanlagenbau GmbH Rhein/Main, and HERMOS AG** are ISO 14001 certified, which includes commitments to resource efficiency and waste reduction.

The Group's **Environmental Policy** (Annexes 3 and 4) outlines principles for waste avoidance, resource recovery, responsible disposal, and sustainable product lifecycle management. These principles form the foundation for future target-setting.

Preliminary internal discussions have identified the following potential target areas for future development:

- **Reduction of total waste generated per employee or per revenue unit**
- **Increase in the proportion of waste diverted from disposal** (e.g. recycling, reuse)
- **Minimisation of hazardous waste** through improved substitution and process design
- **Tracking and reduction of virgin material use** in selected subsidiaries
- **Expansion of circular design principles** in product and technology development

Elevion is also considering targets related to **biomethane production and circular agriculture**, particularly in Italy:

- **Volume of biomethane produced from renewable sources** (currently initiated in **DEF S.r.l.**)
- **Percentage of agricultural residues reused** within closed-loop local supply chains

Target-setting will be informed by:

- Historical performance data
- Eurostat and sector benchmarks
- Stakeholder expectations, including clients and regulators
- Feasibility constraints in rented facilities and decentralised operations

Progress will be monitored through ESG reporting tools and reviewed regularly by the **ESG Steering Committee**. Stakeholder engagement in target development is planned as part of Elevion's broader ESG strategy rollout.

DISCLOSURE REQUIREMENT E5-4 – RESOURCE INFLOWS

Elevion Group's operations involve a diverse range of resource inflows, including raw materials, energy inputs, and technical components used in construction, engineering, and energy efficiency projects. These inflows are critical to delivering high-performance solutions across the Group's portfolio, which spans building technologies, renewable energy systems, and industrial services.

Key practices include:

- **Local sourcing** of materials where feasible, to reduce transport-related emissions and support sustainable supply chains.
- **Selection of durable and recyclable materials** in product and system design.
- **Avoidance of hazardous substances**, where substitution is technically and economically viable.
- **Monitoring of energy and water inputs** in production and service delivery, with a focus on efficiency and renewable sourcing.

Elevion is also exploring the integration of **circular procurement principles**, including the use of secondary materials and

components with extended lifespans. These initiatives align with the Group's broader ESG strategy and its commitment to responsible consumption and production under **UN SDG 12**.

Elevion Group has not yet disclosed estimated quantitative metrics on resource inflows, despite their materiality. Due to the operational diversity and lack of harmonised data across subsidiaries, reliable estimation is currently not feasible. The Group is developing a methodology to enable consolidated estimates in future reporting cycles, in line with ESRS E5-4 requirements.

DISCLOSURE REQUIREMENT E5-5 – RESOURCE OUTFLOWS

Elevion Group's operations generate diverse waste streams aligned with its sector activities in energy services, building technology, and renewable energy.

We identify 7 waste categories that we can potentially produce in our operations and need to be properly managed:

- **Solid Urban Waste:**
Waste generated by commercial and nonindustrial activities in urban areas. This includes any nonliquid waste generated by the company's operations.
- **Commercial and industrial waste:**
Industrial waste refers to the waste materials generated by industrial processes, manufacturing activities, and commercial operations. It includes various forms of solid, liquid, or gaseous waste produced by industries such as factories, power plants, construction sites, mining operations, and chemical processing facilities.
- **Hazardous Waste:**
Hazardous waste comprises materials that pose a risk to human health or the environment due to their toxic, flammable, corrosive, or reactive properties. Examples include chemicals,

solvents, batteries, and certain electronic waste. Companies must handle, store, transport, and dispose of hazardous waste in accordance with applicable regulations.

- **Electronic waste:**
Electronic waste, or e-waste, refers to discarded electronic devices such as computers, laptops, smartphones, and other electronic equipment. These items can contain hazardous materials like lead, mercury, and cadmium. Companies should have processes in place for the proper collection, recycling, or disposal of e-waste to prevent environmental contamination.
- **Organic Waste:**
Organic waste comprises biodegradable materials such as food scraps, yard waste, and agricultural residues.
- **Recyclable Waste:**
materials that can be collected, sorted and processed to produce new products or raw materials that can be used again.
- **Reusable waste:**
Waste materials or items that have the potential to be used again multiple times, either in their original state or after undergoing refurbishment, repairs, or processing.
- **Basic Obligations**

Member of Elevion Group are expected to count with:

1. Collecting and delivering transparent and accurate information and data based on given definition and time about waste management, reuse, recycle and disposal.
2. Identifying and implementing sustainable solutions to reduce waste production and enhance waste recycle in its operational offices and facilities.

Elevion discloses waste volumes by hazardous vs. non-hazardous categories and treatment methods (reuse, recycling, landfill, incineration). Circular economy principles are embedded through reuse of organic residues, recycling of metals.

Category	Subcategory	Hazardous Waste (tonnes)	Non-Hazardous Waste (tonnes)	Total (tonnes)
(a) Total Waste Generated		2	6750	6752
(b) Waste Diverted from Disposal	Preparation for Reuse	/	/	/
	Recycling	1	1164	1165
	Other Recovery Operations	/	/	/
	Subtotal Diverted from Disposal	1	1164	1165
(c) Waste Directed to Disposal	Incineration	0	205	205
	Landfill	/	3347	3347
	Other Disposal Operations	1	2034	2035
	Subtotal Directed to Disposal	1	5586	5587
(d) Non-Recycled Waste	Total Non-Recycled Waste	1	5586	5587
	Percentage of Non-Recycled Waste	50%	82.75%	82.74%

Waste estimations

To estimate waste generation Elevion Group has categorised its subsidiaries into two groups:

1. **Office-only subsidiaries**
2. **Subsidiaries with operational sites**

Waste Estimation

Distinct coefficients were developed for each group, based on measured data provided by the subsidiaries. The waste types estimated differ according to the nature of the subsidiary.

We are currently enhancing our data collection processes. As some of the reported figures are based on estimates, future refinements may lead to adjustments in the reported values, which could result in year-on-year fluctuations.

Circular Design in Resource Outflows

Elevion Group actively incorporates circular economy principles into its products and materials, aiming to reduce waste and extend the lifecycle of outputs. Examples include:

- **Biogas Digestate:** Reused as fertiliser, closing the nutrient loop.
- **Modular PV Systems:** Designed for disassembly and reuse across installations.
- **Heat Pump Systems:** Modular components allow long-term serviceability and refrigerant recovery.
- **Lighting & HVAC Systems:** Built for dismantling and material recovery.

These features contribute to **waste diversion**, although current reuse volumes are not yet systematically tracked across all entities.

DISCLOSURE REQUIREMENT E5-6 – ANTICIPATED FINANCIAL EFFECTS FROM MATERIAL RESOURCE USE AND CIRCULAR ECONOMY-RELATED RISKS AND OPPORTUNITIES

Biogas Feedstock Risk: Climate and Agricultural Volatility

Elevion's biogas plants in Italy—including AxE Agricoltura, Budrio G.F.E, Società Agricola B.T.C., and Novella Sentieri (Falgas)—rely on a mix of agricultural produce, residues, organic waste, and animal excrements. These feedstocks are inherently vulnerable to:

- Droughts and floods, which can reduce crop yields and biomass availability
- Market fluctuations in agricultural inputs and waste collection costs
- Changes in local waste management policies, which may affect feedstock sourcing

Estimated Financial Impact:

Moderate, due to potential disruptions in biogas output, increased sourcing costs, and reduced operational efficiency.

Likelihood:

Medium (40–60%), especially in climate-sensitive regions such as Northern Italy, where extreme weather events are becoming more frequent.

Mitigation Measures:

- Long-term contracts with farmers and agricultural cooperatives, including clauses that address volume flexibility and price stabilisation

- Diversification of feedstock sources, including increased use of organic waste and animal excrements to reduce dependency on seasonal crops
- Collaboration with municipalities to secure stable access to organic waste streams
- Investment in feedstock storage and pre-treatment infrastructure, to buffer short-term supply disruptions
- Integration of climate risk into feedstock planning, using regional climate data and scenario modeling

These measures aim to enhance feedstock security, stabilise biogas production, and support Elevion's broader circular economy and climate resilience strategy.

Resource Use-Related Risk: Fragmented Data and Limited Visibility Across Subsidiaries

Elevion Group operates through a decentralised structure with over 60 specialised entities across Europe. Many subsidiaries operate in rented facilities or rely on third-party suppliers for materials and waste services. This fragmentation presents challenges in:

- Consolidating data on resource inflows and outflows
- Tracking virgin vs. secondary material use
- Ensuring consistent application of circular economy principles

Estimated Financial Impact:

Low to moderate, primarily due to:

- Missed opportunities for efficiency and cost savings
- Limited ESG rating improvement
- Potential reputational risk if transparency expectations increase

Likelihood:

Medium (40–60%) over the medium-term horizon (2025–2030), especially under CSRD and investor scrutiny.

Mitigation Measures:

To address this risk, Elevion Group is implementing a Group-wide ERP solution aimed at harmonising resource-related processes, improving data traceability, and enabling more consistent ESG reporting across entities. This system will support:

- Standardised tracking of material inputs and waste outputs
- Integration of circularity metrics into operational workflows
- Enhanced visibility for ESG steering and audit readiness

Circular Agriculture and Biomethane Opportunity: Closed-Loop Resource Models in Italy

Elevion Group operates several biogas plants in Italy, including AxE Agricoltura, Budrio G.F.E, Società Agricola B.T.C., and Novella Sentieri (Falgas). These facilities utilise a diverse mix of agricultural produce, crop residues, organic waste, and animal excrements to generate biogas, contributing to circularity, waste valorisation, and climate resilience. In addition, DEF S.r.l. has commenced biomethane production, marking a strategic advancement in Elevion's renewable energy portfolio.

Opportunity Description:

These operations exemplify closed-loop circular agriculture, where organic inputs are locally sourced and converted into energy, while by-products such as digestate are reused as nutrient-rich fertilisers. This model supports:

- Reduction of methane emissions from untreated organic waste
- Diversion of agricultural and food residues from disposal



- Local energy generation from renewable sources
- Nutrient recycling and soil health improvement

The integration of biogas and biomethane production within agricultural ecosystems enhances Elevion's contribution to sustainable farming, energy transition, and circular economy goals.

Estimated Financial Potential:

The financial impact is considered moderate to high, with a medium to high likelihood (60–80%) of realisation over the medium-term horizon (2025–2030). These estimates are based on:

- Feedstock availability and processing capacity across Elevion's biogas portfolio
- Increasing demand for sustainable fuels and regenerative agricultural practices

Strategic Measures to Capture Opportunity:

- Scaling biomethane production in DEF S.r.l. and assessing feasibility in other biogas entities
- Enhancing feedstock traceability and nutrient recovery systems
- Collaborating with local farmers and municipalities to optimise circular flows
- Integrating circular agriculture KPIs into ESG reporting and stakeholder communications

This opportunity aligns with Elevion's Environmental Policy (Annexes 3 and 4), supports compliance with EU taxonomy and CSRD, and reinforces the Group's contribution to UN SDG 12 – Responsible Consumption and Production.

Circular Economy Opportunity: Resource Efficiency and Waste Minimisation Across Subsidiaries

Elevion Group has identified resource efficiency and waste minimisation as **low-cost, high-impact opportunities** across its portfolio, particularly in industrial subsidiaries and engineering-driven entities.

Opportunity Description:

Actions such as improved material selection, design for sustainability, and waste recovery contribute to:

Reduced operational costs

- Enhanced ESG ratings
- Improved compliance with EU waste and product lifecycle regulations

Estimated Financial Potential:

The financial benefit is considered **moderate**, with a **high likelihood (60–80%)** of realisation across the short- to medium-term horizon (2025–2030). These estimates are based on internal waste data, ISO 14001 certifications, and successful implementation of circular practices in selected entities.

Strategic Measures to Capture Opportunity:

- Scaling circular design principles across product and technology development
- Expanding reuse and recycling programmes in operational sites

Leveraging ISO-certified entities as internal best practice hubs Elevion Group has not yet disclosed the financial effects of resource use and circular economy-related risks and opportunities under E5-6. These disclosures are subject to phase-in and will be addressed in future reporting cycles.

SOCIAL



ESRS S1 OWN WORKFORCE





STRATEGY

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Elevion Group’s business model relies on a skilled and regionally distributed workforce to deliver integrated energy solutions across its three core business pillars. The own workforce is central to project execution, innovation, and ESG integration, particularly in technical building systems, renewable energy, and industrial services. Workforce-related risks and opportunities—such as talent retention, training, and diversity—are embedded in Elevion’s strategic planning and are addressed through group-wide policies, ESG-linked KPIs, and performance monitoring.

Elevion Group B.V. confirms that the disclosures under ESRS S1 cover **all employees** across fully consolidated entities, in line with the scope defined under ESRS 2. These employees represent the **materially impacted own workforce** for the current reporting period. While data on **non-employees** (e.g. temporary agency workers, contractors) are **not yet systematically collected**, Elevion Group recognises their relevance and materiality. The Group has initiated internal processes to expand data coverage and expects to implement full reporting on non-employees by **2026**, in accordance with ESRS phase-in provisions.

This phased approach reflects Elevion’s commitment to continuous improvement and alignment with ESRS requirements.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

Elevion Group B.V. recognises its own workforce—including employees and workers’ representatives—as a key stakeholder group with direct relevance to the company’s material social impacts, risks, and opportunities under ESRS S1.

Stakeholder Identification and Engagement

The following stakeholder categories were considered in relation to Elevion’s own workforce:

- **Employees** across all fully consolidated subsidiaries
- **Workers’ representatives** (where formally established)
- **HR and ESG contacts** at the subsidiary level
- **Management Board and ESG Steering Committee**

Stakeholder views were collected through:

- Structured consultations during the ESG planning cycle
- Feedback mechanisms embedded in performance reviews and bonus-setting processes
- Internal surveys and onboarding feedback
- Whistleblowing channels and grievance mechanisms
- Informal feedback via ESG coordination meetings

Key Workforce Expectations

Stakeholder Group	Key Expectations
Employees	Stable employment, fair working conditions, training and development, safety
Workers’ Representatives	Transparency, inclusion in decision-making, respect for labour rights
Subsidiary ESG Contacts	Clear guidance, support in data reporting, alignment with group ESG goals

These expectations were considered in the double materiality assessment and informed the prioritisation of Elevion’s strategic sustainability goals related to workforce development, diversity, and health & safety.

Integration into Strategy and Governance

Workforce stakeholder views are integrated into Elevion’s governance and strategy through:

- ESG Steering Committee coordination and target-setting
- Annual review of workforce-related KPIs and ESG-linked incentives
- Strategic goal setting for 2030, including availability and retention of skilled workforce

- Regular updates to the Management Board on workforce-related risks and opportunities

Elevion Group plans to formalise a **structured annual workforce stakeholder dialogue process starting in 2026**, enhancing transparency and responsiveness in line with ESRS S1 and ESRS 2 paragraph 48.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Elevion Group B.V. has identified several material impacts, risks, and opportunities related to its own workforce through the 2024 Double Materiality Assessment (DMA). These findings directly inform the Group's strategic sustainability goals, business model, and operational priorities.

Material Impacts

The DMA confirmed that Elevion's operations have a material impact on:

- **Working time**
- **Occupational health and safety**
- **Training and skills development**
- **Gender equality and diversity**
- **Fair treatment and equal pay**

These impacts are relevant across all subsidiaries and reflect Elevion's role as a major employer in the energy services sector.

Material Risks

Key risks identified include:

- **Employee burnout and turnover** due to excessive working hours
- **Workplace injuries and liabilities** in high-risk environments
- **Skills gaps** in emerging technologies and ESG-related domains

- **Legal and reputational risks** from non-compliance with equality and safety standards

These risks may affect Elevion's ability to deliver high-quality services, attract talent, and maintain stakeholder trust.

Material Opportunities

Opportunities linked to the own workforce include:

- **Boosting productivity and satisfaction** through flexible work arrangements
- **Enhancing innovation and competitiveness** via continuous training
- **Strengthening ESG credentials** through diversity and inclusion
- **Improving operational resilience** through certified health and safety systems

These opportunities support Elevion's strategic goals and contribute to long-term value creation.

Interaction with Strategy and Business Model

Elevion's business model relies on a skilled, motivated, and resilient workforce to deliver energy efficiency, decarbonisation, and automation solutions. The material workforce-related impacts and risks are addressed through:

- Strategic sustainability goals for 2030, including workforce availability and retention
- ESG-linked KPIs embedded in management incentives
- Group-wide initiatives such as ISO 45001 certification, flexible work policies, and training programmes
- Governance oversight by the ESG Steering Committee and Management Board

These measures ensure that workforce-related sustainability topics are integrated into Elevion's strategic planning, risk management, and operational execution.

IMPACTS, RISKS AND OPPORTUNITIES MANAGEMENT

DISCLOSURE REQUIREMENT S1-1 – POLICIES RELATED TO OWN WORKFORCE

Elevion Group B.V. applies a structured set of internal policies and principles aimed at ensuring that all employees operate in a working environment that is **fair, safe, inclusive**, and conducive to long-term personal and professional development. These policies are implemented across all **fully consolidated subsidiaries** and reflect Elevion's commitment to ethical conduct, equal treatment, and sustainable business practices.

Workforce-related policies are being progressively implemented across Elevion Group entities. Full formalisation and ESRS-compliant documentation are planned for future reporting years.

Policy Scope

The policies apply to:

- All **employees** of Elevion Group entities within the scope of financial consolidation;
- All **geographies** where Elevion operates, with local adaptations as required by national legislation;
- All **material workforce-related topics** identified in the Double Materiality Assessment (DMA), including working time, health and safety, training, diversity, and fair remuneration.

Key Policies and Governance

1. Code of Conduct

- Prohibits child labour and forced labour
- Promotes ethical behaviour, fairness, and respect
- Overseen by the **Head of Governance, Risk & Compliance**

2. ESG Policy

- Covers environmental, social, and governance commitments
- Includes workforce-related goals such as training, diversity, and health & safety
- Overseen by the **Group ESG Manager**

3. Diversity, Equality & Inclusion Policy

- Promotes equal treatment and inclusive culture
- Aligned with the **UN Global Compact Ten Principles**

Policy Integration and Monitoring

- Policies are embedded in Elevion's strategic sustainability goals for 2030
- Implementation is monitored by the ESG Steering Committee
- Subsidiaries are responsible for local compliance and adaptation
- Continuous improvement is supported through internal audits, stakeholder feedback, and ESG reporting cycles

Working Conditions – Working Time

Elevion promotes fair working conditions, including respect for work-life balance, through locally adapted practices aligned with national labour laws. Although a formal Group-wide policy on working time has not yet been introduced, subsidiaries are encouraged to implement flexible schedules where feasible. This approach mitigates the **risk** of excessive working hours, which may lead to employee burnout, reduced efficiency, and increased turnover, while also presenting an **opportunity** to improve employee satisfaction and productivity through improved work-life balance (IRO table – Opportunity). Through this approach, the Group aims to achieve a **positive impact** by upholding fair labour practices that foster wellbeing and satisfaction (IRO table – Positive impact).

Working Conditions – Health and Safety

Occupational health and safety are core principles embedded in Elevion's actions and policies. The Group ensures that all subsidiaries operate in accordance with national legislation. Employees are provided with regular training, and internal audits are conducted to manage and mitigate safety risks. These actions address the **risk** that insufficient safety measures could result in injuries and financial liabilities (IRO table – Risk), while presenting an **opportunity** to reduce accidents, lower insurance costs, and improve operational



performance (IRO table – Opportunity). This commitment contributes to a **positive impact** by creating a secure working environment that supports employee wellbeing (IRO table – Positive impact).

Equal Treatment and Opportunities – Gender Equality and Equal Pay

Elevion is committed to gender equality and the principle of equal pay for work of equal value. We have implemented a group wide diversity and inclusion policy, currently group is preparing a compensation policy as well. These policies at subsidiary level are reinforced by Group-wide standards prohibiting discrimination in any form, with equal access to career opportunities and development. These commitments respond to the **risk** of legal and reputational consequences if equality standards are not met (IRO table – Risk), and promote the **opportunity** to foster innovation, broader problem-solving capacity, and a deeper understanding of diverse markets (IRO table – Opportunity). The Group reports a **positive impact** through increasing transparency, fair evaluation systems, and inclusive workplace culture (IRO table – Positive impact).

Equal Treatment and Opportunities – Training and Skills Development

Training and continuous skills development are prioritised throughout the Elevion Group, with each subsidiary responsible for preparing annual training plans aligned with strategic and regulatory needs. In 2022 group set as its goal the idea of providing at least 13 hours of training per employee annually by 2027 and 14 hours by 2030, already surpassed in 2024 with 27 hours per employee on average. Building on this success Elevion group is committed to maintaining this momentum in the future. This commitment addresses the **risk** of employee skills becoming outdated and the Group losing competitiveness in fast-evolving markets (IRO table – Risk), while simultaneously offering the **opportunity** to maintain a highly skilled, innovative workforce (IRO table – Opportunity). This results in a **positive impact** by supporting long-term employability and internal mobility (IRO table – Positive impact).

Equal Treatment and Opportunities – Diversity

Elevion fosters a diverse and inclusive workforce and has implemented a formal Group-wide Diversity & Inclusion Policy. This policy is following The Ten Principles of the UN Global Compact. DEI policy support inclusive hiring, anti-discrimination practices, and support for underrepresented groups including vulnerable groups. The action plan in case discrimination case reported is defined in group's code of conduct. These practices mitigate the **risks** such as inadequate diversity management could lead to internal conflicts, misunderstanding, and decreased cohesion (IRO table – Risk), while also creating the **opportunity** to enhance decision-making quality and gain market insights through diverse perspectives (IRO table – Opportunity). The Group's approach contributes to a **positive impact** by promoting a culture that reflects inclusiveness and drives innovation (IRO table – Positive impact).

DISCLOSURE REQUIREMENT S1-2 – PROCESSES FOR ENGAGING WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

Elevion Group maintains structured and decentralised engagement processes to ensure that the views and concerns of its employees are effectively integrated into business decision-making and sustainability governance. Meaningful workforce dialogue is embedded at both the local and Group level, supporting the identification and mitigation of material impacts and risks related to the own workforce.

Engagement Mechanisms and Communication Channels

Subsidiaries across the Group apply tailored approaches to employee engagement, based on local context, regulatory requirements, and organisational structure. However, a set of core channels is consistently in use, including:

- **Annual employee surveys**, which collect data on satisfaction, perceived fairness, work-life balance, training opportunities, and inclusion.
- **Internal newsletters and intranet communications** to disseminate ESG-related updates, policy changes, and success stories.
- **Direct access to HR and local line managers**, as well as suggestion boxes or other informal tools.

These mechanisms allow employees to share their views on key topics identified in the **DMA**, such as working time, health and safety conditions, and equal treatment or they can come up with new topics that have been overlooked.

Representation and Social Dialogue

Elevion engages in ongoing dialogue with trade unions and works councils. These bodies are consulted on material workforce-related topics, including occupational health and safety, restructuring, and equality measures. While the structure and frequency of these discussions vary across countries and operating companies, they are typically conducted on an ad hoc basis whenever relevant topics arise.

At the Group level, Elevion participates in the **CEZ European Works Council**, which convenes **twice a year** and provides a structured forum for transnational workforce dialogue. CEZ Group is also responsible for communication with employees' representatives. It enables the Group to consider stakeholder concerns and material workforce issues from multiple countries simultaneously.

Communication is managed directly by ČEZ, which provides this service under the terms of a Service Level Agreement (SLA). The head of group HR in Elevion Group is responsible for ensuring stakeholder engagement and integrating its outcomes into the organisation's strategic approach. This role is actively involved in further discussions with employees and their representatives and ensures that the feedback received is taken into account when shaping the company's strategy and decision-making. Although considerable attention is devoted to this issue and resources are allocated, it is currently not possible to quantify it financially.

Integration of Feedback into Strategy and Policies

Employee input collected through formal and informal channels is regularly reviewed by HR, Compliance, and ESG functions and informs Elevion's policy development, ESG strategy, and action plans.

The approach varies across operating companies. At the central level, employee input is reviewed annually through the evaluation of employee surveys, while informal feedback is assessed on an ad hoc basis. These efforts support the Group's ability to proactively address risks and leverage opportunities related to employee wellbeing, inclusion, and performance.

Future Developments

Elevion Group plans to roll out a formal stakeholder engagement framework that will standardise employee dialogue across the Group.

DISCLOSURE REQUIREMENT S1-3 – PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKFORCE TO RAISE CONCERNS

Elevion Group ensures that all employees have access to secure, accessible, and responsive channels for raising concerns and seeking redress in the event of negative workplace impacts. These mechanisms are a key element of the Group's internal control environment and support the prevention and resolution of human rights and labour-related issues.

Local Grievance Channels

Each Elevion subsidiary is required to implement and maintain grievance mechanisms that comply with European and national legislation and reflect the local cultural and operational context. These channels typically include:

- **Direct access to local HR representatives or line managers**, allowing informal or formal communication of concerns.
- **Designated compliance or ethics officers** who handle sensitive or complex cases confidentially.
- **Anonymous feedback mechanisms**, such as digital reporting tools, in selected countries.
- **Trade union representatives or works councils**, where applicable, as trusted intermediaries for conflict resolution.

These channels are introduced to the workforce during onboarding and reinforced as well through internal communications and employee training programmes. Elevion emphasizes transparency, responsiveness, and non-retaliation as core principles.

The relevance of these local channels is particularly evident in areas identified through the **DMA analysis**:

- In **health and safety**, prompt reporting of risks and incidents is vital to mitigating physical harm and legal liability (DMA analysis – Risk).
- In matters of **equal treatment and diversity**, open reporting supports trust and prevents escalations of discrimination, exclusion, or workplace hostility (DMA analysis – Risk).

Group-Level Whistleblower System

In addition to local channels, Elevion has implemented a Group-wide whistleblower system accessible via the Elevion Group website. This platform:

- Is available in multiple languages to all employees, contractors, and stakeholders.
- Enables anonymous and confidential submission of reports regarding breaches of the Code of Conduct, health and safety violations, harassment, discrimination, or human rights abuses;

- Is managed independently, ensuring impartiality, and compliance with the **EU Whistleblower Protection Directive**;
- Includes clear **non-retaliation guarantees**, with disciplinary consequences for any form of retaliation.
- The system is overseen by the Compliance Department, which possesses the specialised expertise required for its effective management."

Investigation and Remediation Process

All reported concerns, whether submitted locally or via the Integrity Line, follow a structured and consistent resolution process:

1. **Initial review** by HR or compliance teams to confirm relevance and risk level.
2. **Formal investigation**, conducted by internal or external parties depending on the nature and severity of the case.
3. **Remediation measures**, which may include:
 - Disciplinary actions or sanctions.
 - Amendments to internal policies.
 - Targeted employee training.
 - Support for the affected employee (e.g. counselling or job reallocation).

The process is designed to be timely, traceable, and sensitive to the needs of impacted employees. Cases that involve potential Group-wide implications are escalated to the ESG Office.

Monitoring, Reporting and Future Improvements

Each subsidiary is expected to document all grievances and their resolutions in a confidential but standardised manner. In 2024, Elevion initiated the process of **harmonising grievance data collection** across the Group to allow for consistent reporting, trend analysis, and ESG disclosures.

Aggregate data on grievance cases, resolution timeframes, and outcomes is periodically reviewed by the ESG Office as part of Elevion's sustainability governance. This information also informs updates to training programmes and policy frameworks to address underlying causes of recurring issues.

These systems support Elevion's **positive impact** by maintaining a workplace culture based on trust, safety, and integrity—especially in areas such as health and safety, equality, and diversity (DMA analysis – Positive impact).

DISCLOSURE REQUIREMENT S1-4 – TAKING ACTION ON MATERIAL IMPACTS ON OWN WORKFORCE, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS

Elevion Group recognises that proactive management of workforce-related impacts, risks and opportunities is essential not only for ensuring compliance and employee wellbeing, but also for sustaining long-term organisational performance. The results of the **2024 DMA analysis** confirmed that topics such as working time, health and safety, training and skills development, gender equality, and diversity are materially significant for the Group in terms of both societal impact and potential financial relevance.

Resource Allocation and Preconditions for Workforce-Related Targets and Actions

Elevion Group acknowledges that achieving workforce-related targets — including those related to training, health and safety, and diversity — requires appropriate resource planning and financial support. However, **specific allocations such as budget, FTEs, CAPEX/OPEX, and system investments have not yet been quantified** for the 2024 reporting cycle.

Currently, implementation is supported through:

- Decentralised efforts by HR and compliance teams across subsidiaries;
- Group-level coordination by the ESG Steering Committee;
- Existing systems for training delivery, incident tracking, and performance monitoring;
- General operational budgets at the subsidiary level.

No dedicated sustainable finance instruments (e.g. ESG-linked loans or bonds) have been allocated to workforce-related initiatives to date. Preconditions such as system readiness, HR capacity, and data availability are being assessed as part of Elevion's ESG integration roadmap.

By **2026**, Elevion Group plans to:

- Assign FTEs to key social impact areas (e.g. training, diversity, health & safety);
- Quantify OPEX and CAPEX allocations for workforce-related actions;
- Explore sustainable finance instruments to support social impact programmes;
- Define implementation preconditions (e.g. digital infrastructure, training platforms, and internal capacity) to ensure effective rollout and monitoring.

This approach will support more robust planning and enable clearer tracking of progress toward workforce-related sustainability goals, in line with Elevion's commitment to continuous improvement and transparency in ESG governance.

Key Actions on Material Topics

Working Conditions – Working Time and Work-Life Balance

Elevion has taken targeted action to support employees in managing workloads and maintaining a healthy work-life balance:

Subsidiaries are encouraged to implement flexible working arrangements in line with national regulations.

Leaders are trained to recognise early signs of overwork and to promote sustainable work planning.

These efforts address the **risk** of employee burnout and turnover due to excessive working hours, while leveraging the **opportunity** to boost satisfaction and productivity through flexibility (DMA analysis – Working time – Risk & Opportunity). The Group also achieves a **positive impact** by reinforcing the value of work-life balance in day-to-day operations.

Working Conditions – Occupational Health and Safety (OHS)

To minimise safety-related risks, Elevion applies Group-wide expectations for OHS that go beyond legal compliance:

- Certain subsidiaries are certified or aligned with **ISO 45001**, and the Group aims to **increase the share of employees covered by externally certified OHS management systems**. While a precise percentage target is still under development, this direction reflects Elevion's commitment to continuous improvement in workplace safety.

- Regular **risk assessments, toolbox talks, and audits** are mandatory in high-risk environments.
- **Incident tracking systems** are in place to detect patterns and support continuous improvement.

These actions reduce the **risk of injury and financial liability**, while creating the **opportunity to lower insurance costs** and foster a **performance-driven safety culture** (DMA analysis – Health and Safety – Risk & Opportunity). The effectiveness of Elevion's OHS programme contributes to a sustained **positive impact** on workforce security and engagement.

Equal Treatment and Opportunities – Gender Equality and Diversity

Elevion Group has taken action to improve gender representation in leadership roles. In 2024, the Group began implementing measures to support increased female participation in central executive and supervisory functions. These actions include:

- Monitoring diversity metrics across subsidiaries;
- Promoting inclusive hiring practices;
- Integrating gender equality into ESG-linked KPIs and performance reviews.

These actions support the strategic target of **30% female representation in top management**, which is formally disclosed under S1-5.

Equal Treatment and Opportunities – Training and Skills Development

Elevion Group has implemented a decentralised but coordinated approach to workforce development, responding to the increasing complexity of its services and the rapid pace of technological change. Training is delivered through subsidiary-level HR and compliance teams, supported by group-wide ESG coordination. Programmes cover ESG principles, Code of Conduct, safety, and technical competencies, with mandatory onboarding and periodic refreshers tailored to employee roles and risk exposure.

Training effectiveness is monitored through post-training assessments, internal surveys, and links to performance reviews. These mechanisms help identify skill gaps and inform updates to training content. Elevion is also preparing to integrate learning progress tracking into its HRIS platforms by 2027, enabling more consistent oversight and alignment with strategic workforce goals.

These actions directly address the risk of skills obsolescence and support internal mobility, innovation, and employee retention across the Group.

Equal Treatment and Opportunities – Annual Performance Review

Elevion Group is progressively formalising its performance review processes to support fair development opportunities and strengthen workforce engagement. In 2024, subsidiaries applied varying practices, including biennial cycles and informal feedback mechanisms, which limited consistency across the Group. To address this, Elevion initiated a harmonisation effort led by HR and ESG coordination teams, focusing on standardising review templates, integrating feedback into training plans, and linking evaluations to internal mobility and succession planning.

Implementation is supported by existing HR systems and operational budgets, with plans to embed performance reviews into digital platforms by 2026. These actions aim to improve transparency, foster continuous development, and ensure that

performance management becomes a structured part of Elevion's talent strategy.

Equal Treatment, Gender Equality and Diversity

To address risks of discrimination and unequal access to opportunities, Elevion has:

- Introduced structured recruitment procedures to reduce bias;
- Begun monitoring gender balance in promotions and leadership positions;
- Developed a Group-wide Diversity & Inclusion Policy to harmonise local practices.

These actions reduce the **risk** of legal non-compliance and reputation damage, while unlocking the **opportunity** for broader creativity, innovation, and customer alignment through a more diverse workforce (DMA analysis – Gender equality and Diversity – Risk & Opportunity). The implementation of these principles fosters a **positive impact** by shaping a workplace culture rooted in respect, inclusion, and fairness.

Effectiveness of Actions

The effectiveness of actions taken on material workforce-related topics is evaluated through both qualitative and quantitative means:

- **Key performance indicators (KPIs):**
Training hours per employee, OHS incident frequency, employee turnover rates.
- **Survey feedback:**
Insights into perceived fairness, workload, inclusiveness and growth opportunities;
- **Grievance trends:**
Frequency, severity, and resolution of complaints submitted through local and Group-level channels;

The ESG department consolidates this information annually and uses it to update internal action plans and strategic priorities. Regular coordination with HR, Compliance and operational managers ensures that corrective measures are implemented in cases where performance does not meet expectations.

METRICS AND TARGETS

DISCLOSURE REQUIREMENT S1-5 – TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

Elevation Group has begun to define workforce-related targets to support the management of impacts, risks and opportunities identified in the 2024 DMA analysis. These targets are embedded in Elevation's ESG Strategy and HR action plans and relate to key areas such as training and development, equal treatment- Diversity & opportunity- performance review, health and safety & work-life balance. The stakeholders' perspective was represented by internal experts in their respective fields, who participated in setting the targets.

While some targets were already achieved, others are operational, and some are still under development. Subsidiaries are also responsible for setting and monitoring local goals, with Group-level oversight and consolidation coordinated by the ESG and HR department.

Stakeholder Involvement in Target-Setting for Own Workforce

Elevation Group B.V. actively involves its own workforce and workers' representatives in the process of setting and reviewing sustainability-related targets that address material impacts, risks, and opportunities concerning working conditions, equal treatment, diversity, and workforce development.

Stakeholder engagement in this context includes:

- **Structured consultations** with employee representatives and designated ESG contacts at subsidiary level during the annual ESG planning cycle;

- **Feedback loops** integrated into the performance review and bonus-setting processes, particularly for ESG-linked KPIs such as gender equality, training hours, and health & safety metrics;
- **Review of lessons learned** from prior year performance, discussed with relevant workforce stakeholders to inform adjustments to targets and implementation strategies.

This engagement ensures that targets are not only measurable and time-bound, but also reflect the lived experience and priorities of Elevation's workforce. It supports the effectiveness of actions taken under ESRS S1-4 and enhances transparency in line with ESRS S1-5 and MDR-T(e) and MDR-A(f).

Where formal engagement was not feasible for specific subsidiaries, Elevation Group has documented the rationale and plans to expand structured workforce involvement in future target-setting cycles.

Progress Tracking

Progress is monitored through:

- **Annual ESG reporting cycles**, coordinated by the ESG department
- **HR reviews** and internal dashboards at subsidiary level
- **Stakeholder feedback** via surveys and representative bodies

Methodology

Target-setting is based on:

- **Double Materiality Assessment (DMA)** conducted in 2024
- **Benchmarking against industry standards**, including ISO 45001 and EU Directive 2022/2041
- **ČEZ Vision 2030 alignment**, ensuring consistency with group-wide ESG goals
- **ESRS S1 topical standards**, including S1-5, S1-13, and S1-14

Targets are defined as **measurable and time-bound**, with phase-in provisions applied where data is not yet fully available (e.g. non-employee workforce, working time KPIs). Elevation plans to expand its performance monitoring framework in subsequent years through

enhanced indicator development and subsidiary-level implementation support.

Social targets

Female representation in top management

- **Target:** Maintaining a minimum of 30 % female representation in top management (defined as Group Executive and Non-Executive Management and Board Members) until 2030 and beyond.
- **Subtarget:** Support ČEZ Group's broader Vision 2030 target of 30% female representation in management, while recognising that this level may be **challenging to achieve across Elevion's full management structure**, given industry-specific constraints. Benchmarking shows that leading companies in comparable sectors (e.g. technical services, construction) report female representation in management around **20%**.
- **Responsible:** Head of Group HR (strategy), ESG Steering Committee (monitoring)
- **Baseline year:** 2024 (female representation 30% in top management, 7% in management)

Training and Skills Development

- **Target:** Maintain a minimum of **20 hours** per employee per year through 2030 and beyond, in line with industry standards.
- **Responsible:** Head of Group HR (strategy), ESG Steering Committee (monitoring)
- **Comment:** This represents a revised target reflecting Elevion's strategic ambition to sustain high levels of employee development while aligning with market norms. The previous internal target (set in 2022) was 13 hours by 2027 and 14 hours by 2030, which has already been exceeded. The maintenance of target of 20 hours has been set in line with peer benchmark.
- **Baseline year:** 2024 (average training hours of 27 p.a. per employee - this performance is also above the industry average of approximately 20 hours per employee per year.)
- **Context:** These actions directly address the risk of skills obsolescence and support the opportunity to attract, retain, and develop high-performing talent. Elevion's investment in learning and development generates a positive impact on employee retention, mobility, and internal innovation.

Annual Performance Review

- **Target:** Elevion Group aims to increase coverage to **70% by 2027** and **90% by 2030**, aligning with best practices and peer benchmarks. KPI is defined as the percentage of employees receiving annual performance reviews.
- **Responsible:** Head of Group HR (strategy), ESG Steering Committee (monitoring)
- **Baseline year:** 2024 (**53%** of employees received a formal performance review, excluding trainees)
- **Context:** Elevion Group is strengthening its performance management framework to ensure fair access to development opportunities, support career progression, and align with evolving ESG and HR standards.

Monitoring and Governance

Monitoring of progress is decentralised and conducted through:

- Internal ESG reporting.
- Annual HR reviews.
- Subsidiary-level audits and compliance checks.
- Stakeholder feedback collected through surveys and representative bodies.

The ESG department consolidates performance at Group level and uses the results to inform strategic revisions and risk mitigation actions. Some targets are linked to internal KPIs, while others are currently qualitative or in development.

DISCLOSURE REQUIREMENT S1-6 – CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES

Elevion Group operates in 14 countries and employs a diverse workforce spanning a wide range of roles, including engineers, technical field staff, project managers, administrative support, and commercial specialists. The Group's employees are essential to providing its energy services, and understanding the composition of that workforce is critical for effective people management, strategic workforce planning, and ESG transparency.

Total Number of Employees

As of 31 December 2024, Elevion Group engaged a total of 5,525 individuals across its consolidated entities.

This includes 5,009 employees under standard employment contracts and an additional 516 individuals engaged under alternative arrangements (e.g. internships, traineeships, university programmes). Country-level employment definitions follow national legislation. However, when aggregating data at Group level, two headcount definitions are applied to ensure accurate and context-appropriate analysis, here employees refers to headcount not FTE.

- **Headcount excluding alternative contracts** is used for some metrics to avoid data distortion and to align with the headcount definition used in the Elevion Group Annual Report (see p. 126 of the Elevion' 2024 Annual Report where headcount of 5,009 is used).
- **Headcount including all employees (including alternative contracts)** is used for topics where the full scope of personnel is critical—such as Occupational Health and Safety (OHS). In these areas, it is essential to account for everyone present in the workplace, regardless of contract type, to ensure comprehensive safety measures and compliance.

This dual approach balances precision with inclusivity, tailoring the data to the specific needs of each topic.

Breakdown by Country and Gender

Total headcount distribution by gender and by country throughout the Elevion Group.

1st Jan – 31st December 2024		
Total headcount (including alternative contracts)		5525
By gender	Women	1016
	Men	4509
By country	Germany	4333
	Poland	522
	Other	670

The table below shows the employee turnover during the reporting period (excluding alternative contracts i.e. 5009).

Employee turnover	2024	2024 rate
Total number	634	13%
By gender	Women	126
	Men	508
By age	18-29 years	168
	30-49 years	316
	50 years and over	150

Turnover Rate = Number of employees who left during the reporting period / Headcount (excluding alternative contracts) * 100

During 1 Jan - 31 December 2024, the number of employees with non-guaranteed working hours was 90.

Total number of non-guaranteed hours employees	Women/Men	1st Jan - 31st December 2024
	Men	50
	Women	40

Employment Type

Elevion aims to promote long-term employment and job stability. Most employees are on permanent contracts and there is consistent Group-wide tracking of the share of permanent vs. temporary or full-time vs. part-time contracts.

	Full/Part time	Women/Men	1st Jan - 31st December 2024 (including alternative contracts i.e. 5525)
By employment type	Full-time	Women	687
		Men	3815
	Part-time	Women	329
		Men	694

	Fixed/Indefinite term	Women/Men	1 Jan - 31 December 2024 (including alternative contracts i.e. 5525)
By employment contract	Fixed term	Women	182
		Men	891
	Indefinite Term	Women	834
		Men	3618

Monitoring and Future Improvements

To standardise the HR reporting process further in the group various initiative has already been taken, such as implementing new processes to obtain data breakdown on many levels including temporary, non-guaranteed hours employees.

As part of the 2024 ESG Strategy rollout, Elevion is developing a Group-wide human capital data architecture to ensure consistent collection and consolidation of workforce characteristics. This will support improved decision-making, further target setting at group level, and compliance with the ESRS S1 requirements on workforce data disclosure.

DISCLOSURE REQUIREMENT S1-7 – CHARACTERISTICS OF NON-EMPLOYEES IN THE UNDERTAKING'S OWN WORKFORCE

Elevion Group engages non-employee workers across its operations. These workers, including subcontractors, temporary agency personnel, and independent contractors, provide critical support, particularly in technical, project-based roles, supplementing the company's core workforce according to fluctuating operational needs.

Categories of Non-Employee Workers

Non-employees working within Elevion typically include:

- **Subcontracted Technical Workers:** Workers involved in installation, construction, maintenance, and project implementation tasks, typically contracted via external firms.
- **Temporary Agency Workers:** Personnel hired through temporary staffing agencies, often deployed to address peaks in workload or short-term specialist roles.
- **Independent Contractors and Freelancers:** Individuals providing consultancy, specialised technical skills, or project management support.

Quantitative Breakdown and Demographics

Elevion currently does not have a consolidated dataset that details the precise number or demographic composition of its non-employee workforce at a Group level. Information specifically missing includes:

- Total number of non-employee workers across the Group.
- Proportion of non-employee workers relative to the total workforce.
- Geographic distribution of non-employees.
- Demographic breakdown (such as gender, age, or nationality).

In the near future, Elevion Group aims to set up a data collection process, but the situation is complicated because of the large number of entities and the fragmentation of definitions of non-employee workers across individual countries.

Contractual Conditions and Employment Status

Elevion Group mandates compliance with national labour laws and its internal standards, as set out in the Code of Conduct and the Commitment to Ethical Conduct. However, the following information regarding contractual and employment conditions is presently not systematically collected or reported across subsidiaries:

- Typical contract duration for non-employee engagements.
- Distribution of contract types (e.g. fixed-term, indefinite).
- Ratio of part-time versus full-time non-employee engagements.
- Details regarding remuneration structures and benefits provided to non-employee workers.

The Elevion group understands the importance of collecting data in this area so that the necessary measures can be taken. This data will be collected in the future.

Management and Oversight

Management of non-employees involves:

- Supplier onboarding procedures, ensuring alignment with Elevion's ethical standards and labour requirements.

However, Elevion currently does not maintain consolidated Group-level performance metrics regarding compliance with labour standards or outcomes of monitoring activities specific to non-employee workers. This has been recognised as data gap and plans to quantify the data on non-employees under own workforce by **2027**, in line with ESRS phase-in provisions.

Planned Developments

To address these data gaps, Elevion plans to:

- Introduce Group-wide reporting standards and processes related to non-employee workers;
- Establish clear performance indicators and monitoring mechanisms within its broader ESG reporting framework.
- Include comprehensive non-employee workforce data in future sustainability disclosures, anticipated in the 2025 reporting cycle.

DISCLOSURE REQUIREMENT S1-8 – COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

Elevion Group recognises the importance of collective bargaining and social dialogue in fostering fair, transparent, and inclusive working environments. The Group actively engages with workers' representatives and trade unions to ensure that employee voices are heard and integrated into decision-making processes. This approach supports Elevion Group commitment to human rights, decent work, and long-term workforce sustainability.

In accordance with **ESRS S1-8**, paragraphs 58–63, Elevion Group discloses the extent to which the working conditions and terms of employment of its employees are determined or influenced by collective bargaining agreements, as well as the degree of employee representation in social dialogue across its operations.

The Elevion Group has established a **European Works Council (EWC)** agreement, ensuring cross-border representation and structured dialogue on transnational employment matters.

The majority of Elevion Group's employees are based in **Germany**. In Germany:

- **22 %** of employees are covered by collective bargaining agreements.
- **40,25 %** of employees work in establishments where they are represented by elected representatives or work councils.

In other regions, particularly in **Eastern Europe (e.g. Poland)** and **Asia**, Elevion Group does not operate under formal collective bargaining agreements or workers' councils. This is primarily due to limited traditions of sector-wide bargaining and a prevailing preference for individual employment contracts in local labour markets. Nevertheless, Elevion Group ensures fair working conditions and maintains open communication channels with employees through internal HR practices.

The global coverage is 20% for collective bargaining agreements.

Coverage rate	Employees – EEA (For countries with >50 empl. Representing >10% total empl.)	Workers' representation (EEA only) (for countries with >50 empl. representing >10% total empl.)
0-19%	Poland	Poland
20-39%	Germany	
40-59%		Germany
60-79%		
80-100%		

Non-EEA Workforce

Elevion Group confirms that **no collective bargaining arrangements exist in non-EEA subsidiaries**. These entities operate in jurisdictions where such arrangements are either not customary or not legally applicable. Furthermore, the **non-EEA workforce represents less than 3% of total group employment** and is therefore **not considered material** for the purposes of this disclosure. Elevion will continue to monitor developments in non-EEA jurisdictions and assess whether future reporting is warranted based on materiality thresholds and regulatory changes.

DISCLOSURE REQUIREMENT S1-9 – DIVERSITY METRICS

Elevion Group views diversity and inclusion as integral to its long-term success, resilience, and ability to attract and retain skilled employees across the European energy services market. As part of its human capital and ESG strategy, the Group is in the process of consolidating and formalising diversity-related data collection and monitoring across its subsidiaries.

Metrics

Elevion Group tracks diversity indicators using Group-wide reporting framework. Data for all employees, including employees under alternative contracts (i.e. 5525):

Diversity of Employees by Gender	%
Women	18%
Men	82%

Diversity of Employees by Age	%
18-29 years	17%
30-49 years	50%
50 years and over	33%

As for the age distribution visible in the table below, half of the employees are between ages 30 to 49, the second largest group with 33% are employees aged 50+, the least populated group are employees aged between 18 and 29 years

Diversity of Top Management by Gender:	Nr.	%
Women	3	30%
Men	7	70%

Diversity in Top Management by Age:	Nr.	%
30-49 years	9	90%
50 years and over	1	10%

Top management of Elevion Group consists of board (4 members) and other group executive management (7 members). Group CEO Jaroslav Macek is part of both and therefore he is only counted once.

Link to Strategy and Policies

Elevion's commitment to inclusion is anchored in the Code of Conduct and Diversity Policy, which:

- Prohibit discrimination in recruitment and promotion.
- Emphasise equal access to development and leadership opportunities.
- Encourage inclusive workplace practices and representation of underrepresented groups.

The development of a **Group-wide Diversity & Inclusion Policy** by 2025 will provide a structured framework for collecting, monitoring, and reporting on diversity indicators.

DISCLOSURE REQUIREMENT S1-10 – ADEQUATE WAGES

Policy Statement

Elevion Group is committed to ensuring that all employees receive wages that are adequate to meet their basic needs and provide a level of discretionary income, in line with the principles of Directive (EU) 2022/2041 and relevant national benchmarks.

Scope of Assessment

This assessment covers all employees across Elevion Group operations excluding interns and apprentices.

Methodology

Adequate wage benchmarks were determined using:

- **EU countries:** the higher of 60% of national median wage as per Directive (EU) 2022/2041 and minimum wage requirements.
- **Non-EU countries:** National living wage benchmarks or internationally recognised methodologies (e.g. Anker Methodology).

Results

- 100% of employees across all countries of operation are paid at or above the adequate wage benchmark.
- No employees were identified as earning below the adequate wage threshold.

Monitoring & Continuous Improvement

- Elevion Group engages with employee representatives and unions to ensure wage structures remain fair and competitive.
- Elevion Group is committed to maintaining wage adequacy as part of our broader social responsibility and human rights commitments.

Adequate Wages – Non-Employees

Elevion Group acknowledges that **adequate wage data for non-employees** (e.g. agency workers, contractors) is **not currently collected** at Group level. These individuals are not covered by Elevion's internal wage policies, and their compensation is governed by contractual arrangements with third-party providers.

While Elevion expects all contractors and service providers to comply with **national wage regulations and industry norms**, the Group does **not yet systematically assess or confirm adequate wage compliance** for non-employees.

Elevion recognises this as a **data gap** and plans to expand its workforce coverage and due diligence processes by **2026**, in line with ESRS phase-in provisions and supply chain transparency goals.

DISCLOSURE REQUIREMENT S1-11 – SOCIAL PROTECTION

In accordance with ESRS S1-11, Elevion Group discloses whether its employees are covered by social protection against loss of income due to major life events. This includes coverage through public programmes or benefits offered by the undertaking for:

- **Sickness**
- **Unemployment**
- **Employment injury and acquired disability**
- **Parental leave**
- **Retirement**

Coverage Overview

As of the end of the 2024 reporting period, **Elevion Group confirms that all employees, in material countries it operates, across its consolidated entities are covered by social protection** against income loss due to the major life events listed above (except for paternal leave coverage in Israel – see below). Coverage is provided either through national public social security systems or through supplementary benefits offered by Elevion Group companies.

This includes:

- **Public insurance schemes** in all material operating countries (Czech Republic, Germany, Austria, Italy, Poland, Romania, Hungary, Netherlands, United Kingdom, Spain).
- **Supplementary employer-provided benefits**, such as extended sick leave, parental support programmes, and retirement contributions, where applicable.

Notable Exception – Parental Leave in Israel

Israel does not offer a standalone statutory entitlement to paternity leave or broadly supported shared parental leave. While the law allows the limited transfer of maternity leave between parents under specific conditions, this does not constitute equal or independent parental leave rights for fathers or second parents. Therefore, coverage in Israel is considered partial under ESRS S1-11.

Future plans

Elevion Group remains committed to ensuring comprehensive social protection for all employees. As part of its ESG strategy, the Group

will continue to monitor legislative changes and expand its internal benefit programmes to maintain alignment with ESRS and broader EU social sustainability goals.

DISCLOSURE REQUIREMENT S1-12– PERSONS WITH DISABILITIES

Elevion Group is committed to ensuring that persons with disabilities are fully included in the workplace and have equitable access to employment opportunities, development, and support. This commitment is embedded in the Group's internal policies and reflects its broader principles of inclusion and respect for individual dignity.

Policy Commitments

The Diversity Policy outlines the Group's approach to supporting employees with disabilities, including:

- Prohibition of discrimination during hiring, development and promotion.
- Provision of reasonable workplace accommodations.
- Encouragement of openness and accessibility across the employment cycle.
- Efforts to promote cultural understanding and inclusiveness through internal communication and training.

These principles are applied by subsidiaries in accordance with national legal frameworks and cultural contexts.

Disability Metrics and Breakdown

As of 2024, selected Elevion subsidiaries collect voluntary self-declared data on disability status. In 2024, a total of 144 individuals with disabilities were recorded, forming the baseline for our social inclusion analysis. This group represents 100% of the sample population under review. The data is segmented by gender and age to better understand the demographic composition and identify areas for targeted support.

Gender Representation: Of the total, 81% (n = 116) are men and 19% (n = 28) are women. This distribution reflects the gender composition of the entire group.

Age Distribution: Most individuals with disabilities are aged 50 and above, comprising 69% (n = 99) of the sample. Those aged 30–49 account for 25% (n = 36), while the youngest group, aged 18–29, represents only 6% (n = 9). This age-related trend underscores the importance of age-sensitive policies and programmes, especially in the context of workforce participation, healthcare access, and long-term care planning.

This data reinforces our commitment to inclusive practices and equitable representation. It serves as a foundation for developing targeted initiatives that address the specific needs of people with disabilities across gender and age groups, in alignment with our broader ESG objectives. Collected data summary is available in the table below:

People with disabilities		2024 (Total number of People with disabilities)	2024 (% of People with disabilities)	2024 (compared to the total headcount)
Total number		145	100%	3%
By gender	Women	27	19%	3%
	Men	118	81%	3%
By age	18-29 years	9	6%	1%
	30-49 years	37	26%	1%
	50 years and over	99	68%	6%

Workplace support and accessibility measures across Elevion Group entities, actions taken to support employees with disabilities include:

- Flexibility in working hours and tasks.
- Confidential channels for requesting support.

Active engagement with disability-related topics in the development of the Group's Diversity & Inclusion Policy.

Where possible, local HR teams work with external specialists or legal advisors to ensure accommodations are suitable and compliant with national regulation.

DISCLOSURE REQUIREMENT S1-13 – TRAINING AND SKILLS DEVELOPMENT METRICS

Elevion Group recognises training and skills development as a strategic enabler of operational excellence, employee retention, and innovation. The Group invests in continuous learning and development programmes across all subsidiaries, aligning training efforts with its business strategy and the material workforce-related risks and opportunities identified in the DMA.

Training and Skills Metrics (2024)

Employees with standard employment contracts are included in this metric i.e. 5,009; here employees with alternative contracts (e.g. interns) are excluded for this reporting year.

The following training and skills development indicators are currently monitored and reported at the Group level.

% of employees receiving performance review		53%
By gender	Women	53%
	Men	53%

*AR 77 (b) number of reviews in proportion to the agreed number of reviews by the management is currently not available

Number of Training hours and Development (2024)

	Hours
Total number of training hours	149253
Average hours of training per employee	30
Average hours of training per employee – Men	31
Average hours of training per employee – Women	22

These metrics are collected through local HR systems and consolidated by the ESG department on an annual basis. This includes also employees under alternative contracts like trainees, interns, etc.

Training Priorities and Programme Content

Training activities are defined through annual plans developed by each subsidiary. These plans reflect business needs and are aligned with Group-level ESG and compliance requirements. Core training areas include:

- **Technical and operational upskilling:** such as energy efficiency technologies, photovoltaics, project delivery tools.
- **Health and safety:** including ISO 45001 standards and site-specific safety training.
- **Ethics and compliance:** including Code of Conduct, anti-corruption, and data protection.
- **ESG awareness and sustainability:** to embed Elevion's values and long-term goals.
- **Digital skills and innovation:** focusing on IT tools, cybersecurity, and AI applications

Participation in training is mandatory for all new employees, and regular refreshers are assigned to existing staff depending on role and exposure to risk.

Monitoring and Continuous Improvement

Training effectiveness is measured through:

- Evaluation of training hours against targets.
- Post-training assessments or certifications.
- Feedback collected through internal surveys.
- Links to performance reviews and succession planning.

Preliminary Future Plans

By 2027, Elevion Group intends to integrate learning progress tracking into its HRIS platforms (Human Resources Information System) to enhance **Group-wide Learning & Development Framework**.

DISCLOSURE REQUIREMENT S1-14 – HEALTH AND SAFETY METRICS

Health and safety (H&S) is a fundamental priority for Elevion Group, especially given the nature of its activities in technical project delivery, on-site construction, and energy infrastructure services. The Group's H&S approach is grounded in prevention, continuous monitoring, and employee engagement, with a focus on achieving safe working environments across all entities. However, Elevion Group does not currently have a centralised, group-wide policy

or management system for workplace accident prevention. While some individual entities within the group have implemented their own measures, these practices are not consistently applied across the entire organisation.

Group-Level Health and Safety Metrics

The following indicators are used by Elevion Group to assess and manage occupational health and safety performance:

Number of Employees Covered by an Audited or Certified OHS Management System	Employees	Percentage
Number of employees covered by the internally audited OHS management system	5507	99.67%
Number of employees covered by the OHS management system that has been audited or certified by an external party	2015	36%

Data is collected by local HSE (Health, Safety & Environment) teams and consolidated by the ESG Office as part of the annual ESG reporting cycle. However, not all indicators are as yet fully standardised or disclosed at the Group level.

The table below shows number of fatalities and injuries.

Work-Related Injuries		2024	
Hours worked	Own workforce		8 822 656
Fatalities	Own workforce	Number	1
		Rate	0.1
Reported injuries	Own workforce	Number	322
		TRIR	36.5
Number of lost time injuries	Own workforce	Number	174
		LTIFR	19.7
Number of days lost	Own workforce	Days	2552

Fatalities rate: Number of reported fatalities / (Number of hours worked / 1 000 000)

Total recordable injuries rate (TRIR): The number of reported injuries / (Number of hours worked / 1 000 000)

Lost Time Injury Frequency Rate (LTIFR): The number of lost time injuries/ (Number of hours worked/1 000 000)

Elevion Group promptly reported one incident resulting in a fatality, initiated an internal audit, and subsequently prepared a comprehensive investigative report.

Work-Related Ill Health		2024
Fatalities due to work-related ill health	Employees	0
Reported work-related ill health	Employees	0

The above does not include non-employees yet, as data for this group is currently unavailable.

Use of Metrics in Management

H&S metrics are reviewed at subsidiary and Group level to:

- Identify systemic risks and prevent incidents.
- Evaluate effectiveness of safety interventions and behavioural campaigns.
- Trigger internal audits and policy revisions.

The ESG Office works in coordination with Group Compliance and subsidiary management to analyse H&S data and prepare Group-wide recommendations.

Targets and Continuous Improvement

While Elevion has not yet published formal numeric H&S targets at Group level, several operating entities have adopted internal benchmarks and continuous improvement plans. In the near future Elevion Group plans to expand a coherent approach based on examples of good practice.

DISCLOSURE REQUIREMENT S1-15 – WORK-LIFE BALANCE METRICS

Elevion Group acknowledges that **quantitative metrics on work-life balance (e.g. average weekly working hours, overtime rates) are not yet systematically collected** across all subsidiaries.

Elevion applies **phase-in provisions** under ESRS 1 Appendix C and ESRS 2 Section 17 for this disclosure.

The Group intends to develop and implement relevant metrics by **2026**, aligned with industry benchmarks and national labour standards.

DISCLOSURE REQUIREMENT S1-16 – REMUNERATION METRICS (PAY GAP AND TOTAL REMUNERATION)

Elevion Group recognises that equitable and transparent remuneration is essential for supporting employee satisfaction, upholding legal compliance, and aligning with evolving stakeholder expectations. While remuneration structures and practices are managed primarily at the level of individual subsidiaries, Elevion has begun formalising its approach to Group-wide remuneration data tracking and transparency.

Gender Pay Gap Metrics

Several Elevion subsidiaries currently monitor gender pay equity at the local level. In addition to these efforts, consolidated data is now available and presented in the table below, enabling a more comprehensive view across the Group. While a harmonised Group-wide gender pay gap analysis is still pending, the availability of this data marks a significant step toward greater transparency and accountability.

The Group's Diversity Policy reaffirms our commitment to gender pay equality and outlines strategic measures to enhance reporting and close any identified gaps. The newly compiled data will serve as a foundation for future harmonised analysis and targeted action.

Indicator	Status	Source
Gender pay gap ((Weighted average wage of men – Weighted average wage of women) / Weighted average wage of men)	17.38%	Internal calculation

Calculation method:

For each entity within Elevion Group, the **average wage for men and women** was obtained. To calculate a group-wide gender pay



gap, these figures were **weighted based on the proportion of men and women in each entity relative to the total number of men and women across the entire group.**

This approach represents a **departure from the standard methodology** typically recommended under ESRS, which would involve calculating the average remuneration per gender at the group level using individual employee data. However, due to **GDPR and data privacy considerations**, Elevion Group opted for an **aggregated, entity-level approach** to avoid processing sensitive personal data across jurisdictions.

For the next reporting cycle, Elevion plans to enhance its methodology by aligning more closely with ESRS standards, including the development of a harmonised, group-wide approach to gender pay gap calculation that ensures greater comparability and transparency. Elevion thus applies **phase-in provisions** for this disclosure and plans to align with the ESRS methodology by **2025**, subject to data availability and harmonisation across subsidiaries.

The Group aims to establish formal pay transparency and internal audit mechanisms, in connection with its Group-wide Diversity & Inclusion Policy.

Total Remuneration Metrics

Remuneration packages across Elevion entities generally consist of the following components:

- **Fixed base salary**
- **Variable performance-based components**
- **Non-financial benefits**, such as health programmes, meal vouchers, company vehicles, or pension contributions
- **Additional allowances**, such as training support or commuting expenses

Indicator –	Status	Source
Remuneration ratio (Highest paid individual/Annual median total compensation for all employees)	7.84	Internal calculation

Calculation method:

For each entity within Elevion Group, the **average median for men and women** was obtained. To calculate a group-wide remuneration ratio, these figures were **weighted based on the proportion of men and women in each entity relative to the total number of men and women across the entire group.**

This approach represents a **departure from the standard methodology** typically recommended under ESRS, which would involve calculating the median remuneration per gender at the group level using individual employee data. However, due to **GDPR and data privacy considerations**, Elevion Group opted for an **aggregated, entity-level approach** to avoid processing sensitive personal data across jurisdictions.

For the next reporting cycle, Elevion plans to enhance its methodology by aligning more closely with ESRS standards, including the development of a harmonised, group-wide approach to gender pay gap calculation that ensures greater comparability and transparency.

Planned Improvements

To address these gaps and meet both internal expectations and EU regulatory developments (including the Pay Transparency Directive), Elevion plans to:

- Standardise definitions of remuneration components across subsidiaries;
- Standardise reporting of main HR and ESG indicators

The HR and ESG department are jointly responsible for designing and implementing the remuneration reporting framework. Elevion also plans to link remuneration transparency to broader objectives related to diversity, equity, and inclusion.



DISCLOSURE REQUIREMENT S1-17 – INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

Elevion Group is strongly committed to upholding and promoting human rights across all areas of workforce management. This includes actively opposing all forms of discrimination, whether based on gender, race, ethnic origin, nationality, religion or belief, disability, age, or sexual orientation. This includes preventing harm, addressing grievances fairly and promptly, and strengthening transparency around incidents and complaints raised by employees. The Group has embedded its human rights commitment in key policies such as the **Code of Conduct**, **Diversity Policy**, and **ESG Policy**.

Reporting and Grievance Channels

Employees across all Elevion entities have access to structured internal and external grievance mechanisms, including:

- **Local HR and line manager contact points;**
- **Designated compliance officers**, available for confidential matters;
- **Anonymous reporting and whistle-blowing tools**, including the Integrity Line;
- **Union and works council channels**, where applicable.

The **Integrity Line** (available at <https://elevion.integrityline.app>) allows both employees and external stakeholders to report concerns related to Code of Conduct violations, discrimination, safety breaches, or other human rights issues, anonymously and without fear of retaliation. No complaints were filed in the reporting period. In 2024, one incident was reported through the grievance channel.

Reported Incidents and Complaints (2024)

In line with ESRS S1-17, the undertaking reports one incident of discrimination. It was raised through formal grievance mechanisms during the 2024 reporting period. The incident was assessed as minor in both nature and severity, and did not warrant any financial

penalties. However, it was promptly addressed through established remediation procedures, ultimately resulting in the termination of the harasser's contract. A retrospective evaluation of the situation confirmed that the established processes were functioning properly. In 2024, no fines, penalties, or compensation for damages were paid in relation to reported incidents or complaints.

Severe Human Rights Impacts

Elevion has not reported any confirmed cases of **severe human rights impacts** involving its own workforce as of the 2024 reporting year.

Identifying, classifying and reporting "severe" human rights impacts at the Group level is managed through the Whistleblowing system, which is described in greater detail in chapter G1-1.

Remediation Process

All substantiated complaints are subject to a defined remediation protocol, which includes:

- Internal investigation led by HR or compliance teams;
- Implementation of corrective or disciplinary actions;
- Feedback to the reporting party and documentation of outcomes;
- Escalation to the Group level where appropriate.

A **non-retaliation principle** is strictly enforced and forms part of onboarding training and employee awareness.

Planned Improvements

Elevion Group maintains a strong commitment to upholding human rights and preventing discrimination across its operations. The organisation has implemented grievance mechanisms and preventive measures aimed at minimising incidents related to human rights violations, including discriminatory practices. The consistently low number of reported cases suggests that these measures are effective and contribute to a respectful, inclusive, and safe working environment.

ESRS S2 WORKERS IN THE VALUE CHAIN



STRATEGY

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Elevion Group's business model relies on a broad network of suppliers, subcontractors, and service providers, particularly in technical building systems, renewable energy, and industrial solutions. Workers in the value chain are essential to project execution and service delivery, especially in on-site roles. While Elevion does not directly employ these individuals, its ESG strategy includes supplier screening, contractual ESG clauses, and ethical conduct requirements to promote fair working conditions. Downstream labour (e.g. logistics or retail) is not material to Elevion's operations.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-2 INTERESTS AND VIEWS OF STAKEHOLDERS

Elevion Group engages indirectly with value-chain workers through structured cooperation with suppliers. Stakeholder views are considered via:

- Supplier ESG screenings and questionnaires;
- Evaluation of grievance mechanisms and freedom of association;
- Feedback from whistleblower channels accessible to external stakeholders.

These insights inform Elevion's approach to managing material topics such as **adequate wages**, **secure employment**, and **social dialogue**, as identified in the double materiality assessment. Elevion plans to enhance visibility and engagement with value-chain workers through improved supplier reporting and ESG integration by 2027.

Engagement with Value-chain workers

Elevion Group does **not currently have any Global Framework Agreements or formal union agreements** in place with value-chain workers. The only structured representation mechanism is the **European Works Council (EWC)**, which applies to Elevion's own workforce within the EEA.

Engagement with value-chain workers is primarily indirect and conducted through:

- Supplier ESG questionnaires;
- Whistleblower channels accessible to external stakeholders;
- Contractual clauses promoting fair labour practices.

Elevion has **not yet performed a formal assessment of engagement effectiveness or outcomes** related to value-chain workers. This is recognised as a gap, and Elevion plans to enhance its supplier engagement and due diligence processes by **2027**, in line with ESRS phase-in provisions.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Elevion Group's 2024 Double Materiality Assessment (DMA) identified several material impacts, risks, and opportunities related to workers in the value chain. These include:

- **Secure employment**
- **Adequate wages**
- **Health and safety**
- **Freedom of association**
- **Training and skills development**

These topics are integrated into Elevion's supplier engagement framework and inform procurement practices, ESG screenings, and contractual expectations.

Scope and Clarifications

- **On-site workers not part of Elevion's own workforce** (e.g. subcontractors, service providers) are covered under S2 disclosures.
- **Downstream workers** (e.g. logistics, retail, franchise labour) are not material to Elevion's business model and are therefore not included.
- **Elevion Group does not operate any joint ventures**, and its **special purpose vehicles (SPVs) do not employ any staff**. As such, **workers in joint ventures or SPVs are not considered material** for the purposes of this disclosure.
- **Vulnerable groups** (e.g. migrant workers, women, young workers, trade unionists) are acknowledged as potentially exposed, but Elevion does **not yet collect disaggregated data** by age, location, or role.
- Elevion does **not currently operate a structured system** for assessing vulnerability by characteristics, context, or activity.

These limitations are disclosed transparently, and Elevion applies **phase-in provisions** under ESRS 1 Appendix C and ESRS 2 Section 17. Expansion of data coverage and segmentation is planned by **2027**, aligned with Elevion's ESG roadmap and supplier due diligence enhancements.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

DISCLOSURE REQUIREMENT S2-1 – POLICIES RELATED TO VALUE-CHAIN WORKERS

Elevion Group acknowledges its responsibility not only for its direct employees and companies working in Elevion Group, but also for the well-being and fair treatment of workers throughout its value chain, especially their partnering entities. The Group's supplier and subcontractor management policies include expectations related to decent working conditions, human rights, living wages and inclusive labour practices, as reflected in Elevion's Code of Conduct, Supplier Code of Conduct, which are overseen by Group Governance, Risk & Compliance department. These policies also prohibit any form of child employment and forced labour.

These policies are guided by Elevion's broader ESG commitment and apply to all business partners and service providers operating on behalf of the Group.

Scope and Implementation

Suppliers and contractors are expected to:

- Respect fundamental rights at work, including non-discrimination, fair wages, safe working conditions, **adequate housing** and the right to organise;
- Comply with national labour laws and international conventions;
- Endorse Elevion's **Commitment to Ethical Conduct**, which explicitly includes provisions on working time, wage adequacy, occupational safety, and social dialogue.

Contractual provisions also require suppliers to pass on these commitments to their own subcontractors. This cascading approach is essential to ensure that Elevion's policies are upheld across all layers of its value chain.

Human rights

Our organisation is committed to upholding the highest standards of human rights and labour practices, as outlined in the UN Guiding Principles on Business and Human Rights, the ILO Declaration on

Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. To ensure ongoing compliance, we have implemented the following processes and mechanisms:

- 1. Policy Framework**
We maintain strict Human Rights Principles aligned with international standards, which is integrated into our Code of Conduct and Supplier Code of Conduct.
All employees and suppliers are required to acknowledge and adhere to these policies.
- 2. Due Diligence Processes**
ESG and procurement teams collaborate to evaluate suppliers using ESG screening tools and third-party audits.
- 3. Grievance Mechanisms**
We provide accessible and confidential grievance channels for employees, contractors, and external stakeholders to report concerns related to human rights or labour practices. All grievances are tracked, investigated, and resolved in accordance with our internal procedures and escalation protocols.
- 4. Training and Awareness**
Targeted training is delivered to employees wherever needed, especially those in procurement, HR, and operations, to raise awareness of human rights risks and responsibilities. Suppliers receive onboarding materials and updates on our expectations and compliance requirements.
- 5. Monitoring and Reporting**
We monitor compliance through internal audits, supplier assessments, and third-party verifications. Findings are reported to senior management and, where relevant, disclosed in our annual ESG report.
We track key performance indicators (KPIs) such as supplier compliance scores.
- 6. Continuous Improvement**
We engage with stakeholders, including NGOs and industry initiatives, to stay informed of emerging risks and best practices. Our processes are reviewed regularly to ensure alignment with evolving international standards and regulatory expectations.

The policies in place directly address material issues identified in the **DMA analysis**:

Secure Employment

Elevion promotes employment practices among suppliers that reduce precarity and promote workforce stability. This approach mitigates the **risk** of high turnover and low quality due to job insecurity and supports the **opportunity** to increase reliability and performance within the supply chain (DMA analysis – Secure employment – Risk & Opportunity). The Group's commitment to fair treatment across the value chain helps reinforce a **positive impact** by promoting regulated and balanced working conditions.

Adequate Wages

The Group advocates for the payment of adequate wages by all suppliers. While Elevion does not impose a wage floor above legal standards, it expects contractors to comply with national regulations and industry norms. This policy reduces the **risk** of dissatisfaction and precarity and attrition among workers and encourages the **opportunity** to retain a motivated and productive workforce and supports our contribution to SDG 8 and SDG 10 (DMA analysis – Adequate wages – Risk & Opportunity).

Social Dialogue and Freedom of Association

Suppliers are required to support social dialogue mechanisms and to respect workers' rights to organise and be represented. These expectations are reflected in Elevion's procurement documents and supplier selection and onboarding processes. Fostering dialogue and respecting freedom of association reduces the **risk** of operational disruptions, legal conflicts and reputational damage, while supporting the **opportunity** to build trust and productivity (DMA analysis – Social Dialogue and Freedom of Association – Risk & Opportunity).

Health and Safety

Elevion expects all partners to maintain a safe working environment that meets or exceeds legal requirements. This is particularly relevant for high-risk technical or construction activities. Clear responsibilities for health and safety are typically assigned in service contracts, and basic compliance is verified during qualification, onboarding and in ongoing evaluations. This directly addresses the **risk** of accidents and liability, while promoting a **positive impact** by supporting safe and healthy working environments across the value chain (DMA analysis – Health and safety – Risk & Positive impact).

Work-Life Balance and Training

Although Elevion does not currently have formalised Group-level policies specific to work-life balance or training for value-chain workers, the **DMA analysis** highlights both topics as areas of importance and opportunity. The Group intends to further integrate these aspects into its evolving supplier engagement framework.

Monitoring and Enforcement

The implementation of policies related to value-chain workers is supported through:

- Supplier prequalification and onboarding assessments;
- Periodic evaluations and self-declaration forms;
- Questionnaires, ESG-screenings & ratings or audits.

Failure to meet Elevion's ethical expectations may result in contract suspension or termination, as defined in the Group's general procurement terms.

Elevion Group will progressively expand the scope and granularity of disclosures in future reporting cycles, including financial linkages and performance indicators related to workers in the value chain. While a dedicated ESRS S2 policy is not yet formalised, Elevion has initiated stakeholder engagement processes to inform future policy development. In 2024, stakeholder views were considered through:

- **Supplier feedback** gathered via ESG questionnaires and onboarding processes.
- **Customer and investor expectations** reflected in the double materiality assessment and ESG rating criteria.
- **Internal consultations** with ESG managers and procurement teams across subsidiaries.

No specific input from NGOs or worker representatives was received during this reporting cycle. Elevion plans to establish a structured stakeholder dialogue process starting in **2026**, which will include suppliers, workers, and civil society actors to support policy updates and alignment with ESRS S2.

DISCLOSURE REQUIREMENT S2-2 – PROCESSES FOR ENGAGING WITH VALUE-CHAIN WORKERS ABOUT IMPACTS

Elevion Group recognises that maintaining fair and sustainable labour practices across its value chain requires not only contractual enforcement but also meaningful engagement with the workers of its suppliers and subcontractors. While Elevion does not have direct contractual relationships with all individuals employed in its value chain, it promotes mechanisms to strengthen the voice and protection of these workers through supplier policies, onboarding protocols, and Code of Conduct.

Supplier-Level Engagement Mechanisms

Elevion's engagement with value-chain workers is conducted primarily indirectly, through structured cooperation with suppliers, compliance questionnaires, assurances or external verification in particular. The following areas are monitored:

- Workplace conditions and safety management;
- Respect for workers' rights and freedom of association;
- Procedures for workers to raise complaints and seek redress;
- Training and upskilling programmes living conditions, adequate housing (especially in the UK), sanitation, wages for workers employed by contractors.

Suppliers are encouraged to implement their own engagement and grievance mechanisms for their workforce, and Elevion requests visibility over such procedures when evaluating new suppliers or subcontractors continuously through screenings and monitoring. These practices support the management of material topics identified in the **DMA analysis**, such as **health and safety**, **secure employment**, and **adequate wages**.

If issue raised, we have a process to directly assess the situation possibly heading to contractual breach.

However, Elevion does not currently operate a structured system for engaging directly with non-employee workers in the value chain at scale.

Key Engagement Themes (based on DMA Analysis)

The following topics are prioritised in supplier discussions and assessments, aligned with material risks and opportunities:

- **Social dialogue and freedom of association** – Elevion verifies whether suppliers respect the right of workers to join trade unions or elect representatives. The **DMA analysis** identifies that effective social dialogue helps prevent misunderstandings and disputes, while improving cooperation and problem-solving (DMA analysis – Social dialogue – Risk & Opportunity).
- **Employment stability and fair wages** – Suppliers are assessed on contract structures and wage compliance, as these affect turnover, morale, and overall productivity. These themes directly reflect **risks** related to insecure and underpaid work in the supply chain (DMA analysis – Secure employment & Adequate wages – Risk).
- **Health and safety** – Contractors must demonstrate that they maintain safe working environments, with adequate training and preventive protocols. Elevion engages in follow-up conversations where concerns are identified during audits or performance reviews (DMA analysis – Health and safety – Risk & Opportunity).

Planned Improvements

Elevion has identified the need to strengthen direct and indirect engagement with value-chain workers. As part of its ESG development roadmap, the Group intends to:

- Expand due diligence processes to include structured review of supplier workforce engagement practices;
- Develop standardised criteria and questionnaires regarding workforce consultation, grievance management, and workplace culture;
- Include workforce engagement as a component of supplier ESG self-assessments, starting with priority suppliers in high-risk sectors.

These measures aim to increase Elevion's visibility over working conditions and labour impacts across the supply chain and support the establishment of reliable and cooperative partnerships with suppliers.

DISCLOSURE REQUIREMENT S2-3 – PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR VALUE-CHAIN WORKERS TO RAISE CONCERNS

Elevion Group is committed to upholding responsible business practices throughout its value chain. This includes the availability and effectiveness of mechanisms for identifying, reporting, and remediating negative impacts experienced by workers of suppliers and subcontractors. While Elevion's direct influence over value-chain workers is limited by contractual structures, the Group applies clear requirements for suppliers to implement fair and transparent grievance procedures.

Local-Level Grievance Mechanisms

All Elevion suppliers are required to comply with our Code of Conduct to:

- Provide their employees with clear and accessible channels for raising concerns, including anonymous reporting options;
- Ensure that grievance procedures are impartial, timely, and protect individuals from retaliation;
- Escalate unresolved or material complaints to the principal contractor, including Elevion if applicable.

These requirements reflect the Group's view that **poor communication and lack of grievance channels can lead to human rights abuse or reputational risk conflict, and operational disruption**, as outlined in the **DMA analysis – Social Dialogue – Risk**.

However, Elevion does not yet maintain Group-wide visibility into the effectiveness or coverage of these grievance systems and therefore the number of suppliers with functional grievance mechanism or the outcomes of reported cases are unknown. The channels are shared both externally and internally and we noted 0 cases for 2024.

Elevion's Integrity Line – External Access

To complement supplier-level mechanisms, Elevion offers an externally accessible **whistleblower platform**, which is described in greater detail in chapter G1.

Remediation and Follow-Up

Where Elevion becomes aware—either through supplier disclosure, whistleblower reports, or audits—of labour-related harm in its value chain, the response may include:

- Requiring the supplier to investigate and remediate the situation promptly;
- Providing guidance or resources to help improve internal grievance mechanisms;
- Suspending or terminating supplier relationships in cases of serious and unresolved breaches.

Elevion encourages collaborative resolution where possible but maintains a zero-tolerance approach to systemic or any human rights violations, including forced and child labour, unsafe conditions, or interference with freedom of association.

Upon receiving a whistleblower report or other credible indication of labour-related harm, the GRC department initiates an internal investigation to assess the nature and severity of the issue. If the concern is substantiated, Elevion works with the supplier to implement corrective actions within a defined timeframe. The GRC team monitors progress, ensures follow-up, and may escalate the matter if remediation is insufficient. Serious or unresolved breaches may result in suspension or termination of the supplier relationship.

Future Plans

To enhance oversight and accountability, Elevion plans to:

- Integrate supplier grievance performance into ESG assessment frameworks;
- Request regular reporting from critical suppliers on the use and outcome of internal grievance mechanisms;
- Establish Group-wide KPIs related to value chain grievance resolution.

These efforts will improve Elevion's ability to manage and remediate risks proactively and support compliance with EU legislation on supply chain due diligence.

DISCLOSURE REQUIREMENT S2-4 – TAKING ACTION ON MATERIAL IMPACTS ON VALUE-CHAIN WORKERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO VALUE-CHAIN WORKERS, AND EFFECTIVENESS OF THOSE ACTION

Elevion Group is progressively strengthening its approach to managing risks, opportunities, and impacts affecting workers in its value chain. The 2024 DMA analysis confirmed that several subtopics—such as secure employment, adequate wages, social dialogue, freedom of association, health and safety, and training—represent material concerns in terms of both ethical responsibility and operational performance.

Key Actions on Material Topics

Secure Employment

To address the **risk** of precarious employment conditions within the supply chain, Elevion requires suppliers to provide contracts that comply with national labour laws and international standards. These measures help mitigate high turnover and productivity losses (DMA analysis – Secure employment – Risk). At the same time, Elevion encourages stable, long-term employment relationships that contribute to reliable service delivery (DMA analysis – Secure employment – Opportunity).

Adequate Wages

Elevion advocates for the payment of fair and living wages by all suppliers. The **opportunity** to retain a motivated and efficient workforce through adequate remuneration is recognised as a priority in supplier evaluations (DMA analysis – Adequate wages – Opportunity). Although Elevion does not impose wage levels beyond legal minimums, it expects compliance and transparency on payment practices aligned with human rights and the SDGs requirements.

Social Dialogue and Freedom of Association

Elevion promotes and requires effective social dialogue and respect for workers' rights to organise and join representative bodies. These principles are integrated in Elevion's Code of Conduct and are expected to be reflected in supplier internal policies and grievance procedures Action: Mandatory endorsement of Elevion's Commitment to Ethical Conduct, including respect for unionisation and dialogue.

- Result: Increased awareness among suppliers of expectations for open communication and workplace representation.
- Material relevance: Addresses the **risk** of conflict escalation and legal exposure and supports the **opportunity** to foster a cooperative and productive workforce (DMA analysis – Social dialogue & Freedom of association – Risk & Opportunity).

Health and Safety

Elevion applies strict requirements to ensure that contractors maintain a safe work environment:

- Evaluation of health and safety systems during qualification and onboarding of new suppliers;

- Alignment with ISO 45001 principles;
- Corrective measures in case of observed deficiencies.

These efforts respond to the **risk** of accidents and legal liability in outsourced work and support a **positive impact** by promoting a culture of prevention and safety in the value chain (DMA analysis – Health and safety – Risk & Positive impact).

Effectiveness of Actions

Currently, Elevion monitors supplier performance mainly through onboarding due diligence, contract clauses, and occasional follow-up assessments. However, consolidated indicators or Group-wide effectiveness tracking on the above themes is under development.

Financial Resources and Investments

As of the 2024 reporting period, Elevion Group has **not yet quantified** specific **OPEX, CAPEX, or financial instruments** related to actions targeting workers in the value chain. No direct financial commitments have been disclosed in the financial statements for this topic. This reflects the current phase of ESG integration, where strategic and governance foundations are being laid, but financial resource allocation is still under development.

Linkage to Financial Statements

There is **no direct linkage** between the actions described under ESRS S2 MDR-A and the consolidated financial statements for 2024. Elevion Group plans to enhance financial traceability and integrate ESG-related expenditures into future financial disclosures, in line with ESRS requirements.

Future Financial Commitments

No future financial commitments have been disclosed for ESRS S2 MDR-A in the current reporting cycle. Elevion Group acknowledges this gap and commits to:

- Defining financial resource allocations (OPEX, CAPEX) for value chain workforce actions by **2026**.
- Exploring the use of **sustainable finance instruments** to support supplier development, training, and ESG compliance.
- Integrating these commitments into the Group's strategic planning and ESG performance monitoring frameworks.

Phase-In and Data Limitations

In accordance with **ESRS 1 Appendix C** and **ESRS 2 Section 17**, Elevion Group applies phase-in provisions for certain disclosure requirements. The absence of quantified financial data and commitments under MDR-A for S2 reflects current **data limitations**, **methodological development**, and the voluntary nature of this first ESG report.

METRICS AND TARGETS

DISCLOSURE REQUIREMENT S2-5 – TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

Elevion Group has initiated the development of formal targets to address material risks and impacts on value-chain workers, as identified in the 2024 Double Materiality Assessment (DMA). The current focus is on sustainable procurement, with further targets to be introduced in future reporting cycles. These will be shaped by stakeholder input, regulatory developments, and internal ESG coordination, and are expected to cover areas such as employment conditions, fair compensation, and health and safety across the value chain.

Strategic Alignment

The sustainable procurement target is aligned with ČEZ Vision 2030, particularly its emphasis on strengthening ESG criteria across the supply chain. Elevion Group contributes to this ambition by promoting ethical conduct, environmental responsibility, and transparency in supplier relationships. The rollout of the Supplier Code of Conduct supports ČEZ's broader goals of responsible sourcing and stakeholder engagement, and lays the foundation for future integration of ESG clauses into procurement contracts and supplier evaluations.

Sustainable procurement

- **Target:** Tier 1 suppliers to sign Supplier Code of Conduct of the Elevion Group with target of **70% by 2027** and **100% by 2030** across Elevion's **EU operations**, with potential future extension to international subsidiaries.
- **Responsible:** Chief Commercial Officer (strategy), ESG Steering Committee (monitoring)

- **Baseline year:** 2025 is designated as the baseline year, marking the start of formal data collection and performance tracking.
- **Historical evolution:** While the Supplier Code of Conduct was introduced already in prior periods, Elevion Group did not systematically track supplier sign-off rates in 2023 or 2024. Informal implementation began in selected subsidiaries, primarily through ESG onboarding and tender documentation, but no consolidated data was collected. As a result, 2025 has been designated as the formal baseline year for performance tracking. This reflects the start of structured data collection, harmonised reporting templates, and centralised monitoring by the ESG Steering Committee. Historical uptake is assumed to be limited and uneven and will be retrospectively assessed where feasible during the 2025 reporting cycle.
- **Assumptions:** The target assumes continued rollout of the Code of Conduct, integration into procurement processes, and active supplier engagement.
- **Stakeholder Involvement:** Initial target-setting was informed by internal consultations with ESG and procurement teams, and aligned with **ČEZ Vision 2030**. Broader stakeholder input (e.g. suppliers, investors) will be incorporated into future updates.



ESRS S3 AFFECTED COMMUNITIES





STRATEGY

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

While ESRS S3 was assessed as **non-material** in Elevion Group's 2024 Double Materiality Assessment, the Group acknowledges that certain operations—particularly those involving construction, energy infrastructure, and site-based services—may have **local community impacts**. Elevion's business model prioritises responsible project delivery and stakeholder cooperation, especially in regions where physical presence or infrastructure development may affect local populations. Policies related to community engagement are embedded in the ESG Policy and Code of Conduct, and apply across all subsidiaries involved in project implementation. These measures support Elevion's broader commitment to maintaining its social license to operate and fostering positive relationships with affected communities.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

Stakeholder engagement is central to Elevion Group's sustainability strategy and business model. The company regularly consults over five stakeholder groups—including employees, suppliers, customers, shareholders, banks, and local communities—using tools like surveys, onboarding, and whistleblowing channels. Feedback helps shape policies such as Diversity and guides the prioritisation of ESG risks, with outcomes reviewed by HR, Procurement, and Compliance teams as part of the double materiality assessment. Planned improvements aim to further integrate external perspectives and enhance transparency.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Elevion Group's 2024 double materiality assessment has identified key impacts, risks, and opportunities arising from its energy efficiency activities and value chain relationships, shaping its strategy and business model. But no material topics were identified in S3.



IMPACT, RISK AND OPPORTUNITY MANAGEMENT

DISCLOSURE REQUIREMENT S3-1 — POLICIES RELATED TO AFFECTED COMMUNITIES

Elevion Group recognises that its operations can impact local communities and has established policies to manage these effects responsibly and build positive stakeholder relationships.

Community Engagement and Policies

Elevion Group's commitment to affected communities is embedded in its ESG Policy, Code of Conduct, and Community Relations Policy (adopted from CEZ Group). These policies, overseen by the ESG Manager, align with UN Sustainable Development Goals and six UN investment principles, and promote sustainable business, social value creation, diversity, inclusion, equal opportunities, and innovation through stable employment. The Group also cooperates transparently and fairly with public authorities, respecting all parties' roles.

The policies apply uniformly to all Elevion Group subsidiaries involved in project implementation, service delivery, or site operations with potential community interactions.

Looking ahead, these initiatives will enhance the Group's ability to proactively manage its social license to operate and strengthen community relations in all regions where it is active.

DISCLOSURE REQUIREMENT S3-2 — PROCESSES FOR ENGAGING WITH AFFECTED COMMUNITIES ABOUT IMPACTS

Elevion Group systematically engages with potentially affected communities, ensuring that both positive and negative impacts are proactively identified, communicated, and managed.

Community Engagement Processes and Monitoring

Subsidiaries use tailored engagement methods depending on project specifics, with common practices including feedback channels and grievance mechanisms such as dedicated email addresses, hotlines, and direct contact points at project sites. Community feedback is documented, reviewed, and addressed through double materiality assessment. The effectiveness of these processes is regularly evaluated via DMA analysis, with plans to formalise and improve engagement standards Group-wide by 2027, consistently incorporating stakeholder feedback into decision-making.



DISCLOSURE REQUIREMENT S3-3 — PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR AFFECTED COMMUNITIES TO RAISE CONCERNS

Elevion Group has clear procedures for remediating negative impacts and provides accessible channels for affected communities to raise concerns as part of its ESG framework.

Grievance Channels and Monitoring

Communities can report issues through the Whistleblowing system, which allows confidential and anonymous submissions. It is further described in G1 chapter.

DISCLOSURE REQUIREMENT S3-4 — TAKING ACTION ON MATERIAL IMPACTS ON AFFECTED COMMUNITIES, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO AFFECTED COMMUNITIES, AND EFFECTIVENESS OF THOSE ACTIONS

Based on insights from its 2024 double materiality assessment, Elevion prioritises actions related to project implementation, community safety, environmental stewardship, and stakeholder relationships.

Actions Taken and Effectiveness

Subsidiaries engage regularly with stakeholders, sharing project details, risks, timeline via meetings and direct contacts. To ensure community safety, Elevion has set up strengthen safety protocols covering all project streams.

Elevion assesses the effectiveness of actions through collected feedback via surveys, meetings, and informal channels, helping subsidiaries adjust practices promptly and maintain positive community relationships.

ESRS S4 CONSUMERS AND END-USERS





STRATEGY

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Elevion Group operates primarily in the B2B segment, delivering energy efficiency and decarbonisation solutions to industrial clients, municipalities, and commercial entities. While direct engagement with individual consumers or end-users is limited, Elevion acknowledges that certain products and services (e.g. switchgears, software, PV installations) may indirectly affect end-users. These impacts are considered in product safety, data protection, and ethical marketing practices.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

In the double materiality assessment in 2024 the Elevion group has reflected the views of affected **consumers** via Stakeholder dialog and also through competent representatives of the company. The detail is further described in ESRS 2 in IRO-1.

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

The Elevion group has identified one material positive impact in the Health and Safety of Personal safety of consumers area through its 2024 double materiality assessment regarding consumers. This impact plays a pivotal role in shaping the company's overall strategy and business model. The health and safety of Elevion Group's customers is a top priority and directly informs all company activities, including project planning and execution.

Health and Safety is a key element which we prioritise over other interests and activities and is therefore an integral part of our business. To meet these priorities, we proceed in such a way that all activities are in accordance with the requirements of the regulators held by the Company.

As only one impact was found material within S4 topic, no material connections between impacts and risks and opportunities have been found.

By adhering to strict safety standards in the design, manufacturing process and distribution, but also by conducting regular safety audits and compliance checks ensure our products' quality and safety. Elevion Group strives to constantly improve the quality of its products and services.



IMPACT, RISK AND OPPORTUNITY MANAGEMENT

DISCLOSURE REQUIREMENT S4-1 — POLICIES RELATED TO CONSUMERS AND END-USERS

Elevion Group goal is to achieve long-term and transparent relationships based on respect and honesty with all our customers. Therefore, the policies are geared especially towards protecting consumer rights, ensuring product safety, and maintaining ethical standards.

Strategic Alignment

The consumer-related targets disclosed below are aligned with ČEZ Vision 2030, particularly its pillar on **decent corporate citizenship**. Elevion Group contributes to this ambition by promoting responsible business conduct, ensuring product safety, and protecting end-user rights in its digital and hardware offerings. While Elevion operates primarily in the B2B segment, its commitment to transparency, ethical standards, and stakeholder trust reflects the broader strategic direction of the ČEZ Group and supports its ESG-linked goals. Initial target-setting was informed by internal consultations with ESG, compliance, and product teams, and reflects operational priorities identified in the 2024 Double Materiality Assessment. While structured stakeholder involvement is still evolving, Elevion plans to introduce a formal stakeholder dialogue process in 2026 to strengthen alignment between consumer-related targets and stakeholder expectations.

Core principles

Elevion Group commits to act in accordance with laws, regulations and rules that belongs to the Elevion group's basic rules of ethical conduct in the company. The core principles are summed up in the **Code of Conduct** policy, which is overseen by the Head of Governance, Risk and Compliance department. The document is based on national legislations of the countries where Elevion Group operates but also on applicable European Union standards, including consumer rights. It applies to all employees and members of bodies of Elevion Group B.V. Furthermore, we integrated international conventions of the International Labour Organisation, the United Nations and international agreements on human rights.

The policy is monitored by the team of Governance, Risk and Compliance department and it is shared with external third parties publicly on Elevion's website.

Product and service-related information

To fulfil our transparency goal, we adhere to the following principles: The Elevion Group provides services in a qualified, professional manner. In accordance with the best available knowledge, we provide our customers with clear, unbiased, complete, and up-to-date information that is not misleading. We are also committed to providing accurate information regarding the electricity market.

Advertising

When offering services to customers, we provide only true information and communicate all terms of the contractual relationship in an understandable way. When promoting services and advertising



activities, we provide true information, without elements of inappropriate or deceptive advertising, do not hide important facts, ensuring the information is accessible and understandable for all groups and do not offer benefits that cannot be guaranteed.

DISCLOSURE REQUIREMENT S4-2 – PROCESSES FOR ENGAGING WITH CONSUMERS AND END-USERS ABOUT IMPACTS

Stakeholder engagement with consumers and end-users was conducted during the 2024 Double Materiality Assessment through questionnaires and internal consultations. This process was coordinated by the Group ESG Manager and informed the prioritisation of sustainability topics.

Currently, we do not have a system in place to monitor the effectiveness of our customer engagement efforts. No formal outcomes or agreements resulted from the 2024 engagement. Elevion plans to enhance its engagement framework by introducing structured feedback mechanisms and outcome tracking starting in 2026, aligned with the broader stakeholder dialogue process.

DISCLOSURE REQUIREMENT S4-3 – PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS

The Elevion Group supports the culture of speaking up and open communication to prevent behaviour that is not aligned with our values and rules. Therefore, we offer anyone an opportunity to raise concerns and complaints via Whistleblowing System, which is described in more detail in chapter G1.

DISCLOSURE REQUIREMENT S4-4 – TAKING ACTION ON MATERIAL IMPACTS ON CONSUMERS AND END-USERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO CONSUMERS AND END-USERS, AND EFFECTIVENESS OF THOSE ACTIONS

Addressing Material Impacts

The company systematically reviews its operations to identify material impacts on consumers and end-users, employing stakeholder feedback, impact assessments, costumer satisfaction surveys and risk analysis as core methodological tools. It actively engages in creating and implementing strategies to manage these impacts effectively while ensuring transparency and accountability. Simultaneously, Elevion focuses on initiatives that generate positive impacts, such as enhancing safety standards. Actions include safety improvements and regular health and safety audits.

Preventing Negative Impacts

The company ensures its marketing and data usage policies to prioritise consumer interests and data protection, balancing business objectives with social responsibilities.

Internal Audits

Internal Audits are the key measures adopted with the aim of addressing and remedying the situations. As a part of its responsibilities, the Internal Audit department systematically reviews internal controls and business processes if required or special circumstances occur. They are performed by Audit committee/department of CEZ and in cooperation with Governance, Risks & Compliance department of Elevion Group. The scope of audit can be modified based on the Elevion Group requirements, special needs of the audited company and is agreed between the Head of Elevion Group department and Head of Internal Audit. Such audit usually covers following areas:

- General full company healthcheck
- Governance and risk management
- Sales and procurement process
- Human resources process
- ICT security including GDPR compliance.

In the year 2024, in total 3 internal audits among different subsidiaries were completed. There are also 3 audits planned to be assessed in the year 2025.

Elevion Group is currently establishing processes to systematically assess the potential health and safety impacts of its products and services throughout their life cycle. In 2024, the following assessments were conducted:

Assessment Metric	Value
Total number of products and services assessed	241
Number of products and services requiring improvements related to health and safety	75

Based on these findings, Elevion Group initiated targeted projects and process enhancements to address the identified issues and improve the overall quality and safety of our offerings. These

actions were guided by the assessment results and corresponding recommendations. Elevion Group remains committed to continuously strengthening the health and safety performance of our products and services.

Other comments

Elevion Group operates primarily in the B2B segment, with limited direct engagement with individual consumers and end-users. Nevertheless, the Group recognises that certain products and services—such as switchgears, automation software, and PV installations—may have indirect impacts on end-user safety, data protection, and satisfaction.

While specific data in this area is currently unavailable, consumer protection measures are an integral part of every project and product Elevion Group offers. However, the associated costs of these measures cannot be quantified at this time.

1. Geographic and Value Chain Coverage

The reported consumer-related actions apply **group-wide** across Elevion’s EU subsidiaries. While direct consumer engagement is limited, Elevion acknowledges that **downstream impacts** on end-users exist through its products and services. **More attention will be paid to the value chain in the coming years**, particularly in relation to product safety, ethical marketing, and data protection.

2. Key Actions and Time Horizons

Key actions taken in 2024 include:

- Integration of product safety assessments into project delivery.
- Implementation of data protection protocols across digital platforms.
- Establishment of a whistleblowing channel accessible to all stakeholders, including end-users.

No formal time horizons have been set for these actions. Elevion plans to define time-bound objectives and performance indicators in future reporting cycles.

3. Financial Instruments and Linkage to Financial Statements

No financial instruments have been used to finance consumer/end-user-related actions. These measures are embedded in Elevion’s operational and compliance processes but are **not tracked as separate OPEX/CAPEX items** in the financial statements.

4. Future Financial Commitments

No future financial commitments have been disclosed for consumer-related actions. Elevion plans to assess the financial implications of these measures as part of its ESG integration roadmap, with further disclosures expected in the **2026 reporting cycle**.



METRICS AND TARGETS

DISCLOSURE REQUIREMENT S4-5 – TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

Elevion Group is committed to ensuring the safety, satisfaction, and rights of consumers and end-users across its services and products. While the Group operates primarily in the B2B segment, certain subsidiaries manufacture products (e.g. switchgears) and provide digital services that directly affect end-user safety and data protection.

Defined Targets and Metrics

Objective	Target	Timeline	Metric
Product Safety & services	Zero confirmed incidents of non-compliance	Annually	Number of incidents related to non-compliance related to quality and health and safety
Data Protection	Zero confirmed breaches of customer data	Annually	Number of incidents related to consumer data breaches

In 2024, no incidents of non-compliance were reported regarding the health and safety impacts of our products and services.

In 2024, no complaints were reported regarding breaches of customer privacy or loss of customer data. One cyberattack was detected during the reporting period and was promptly addressed. All necessary due diligence was carried out in accordance with applicable regulations and in coordination with relevant authorities. The incident and subsequent investigation were thoroughly documented. No confirmed cases of data theft, leakage, or loss of customer data were identified.

Baseline and Trend Comparison

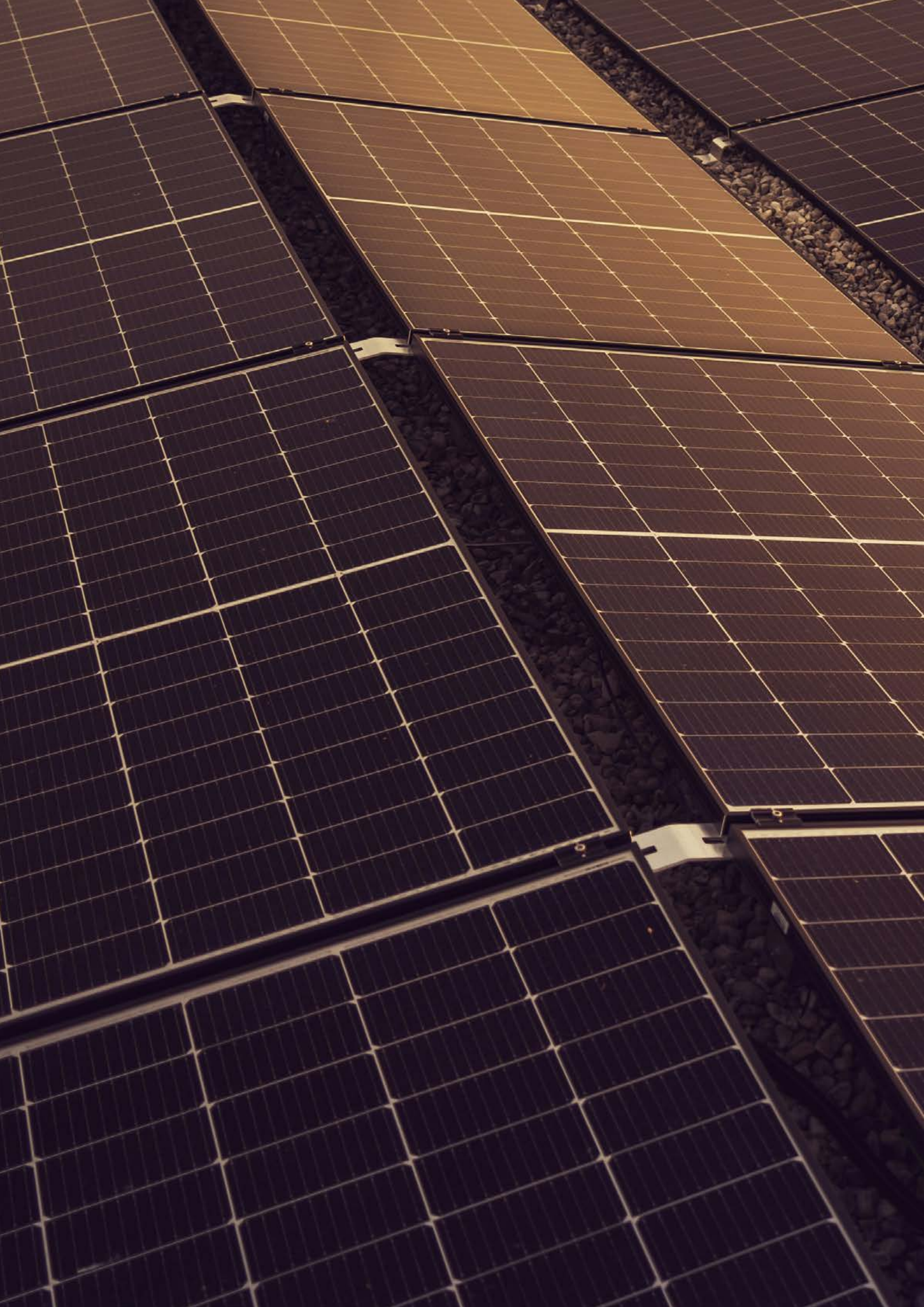
As this is the first year these targets have been formally defined, no historical data or trend analysis is available. The 2025 reporting year will serve as the baseline for tracking grievance handling, transparency, and other consumer-related metrics. While some practices were informally in place prior to 2025 (e.g. internal audits, IT security logs), they were not consolidated or monitored against defined KPIs. Elevion will retrospectively assess available data where feasible and progressively build trend analysis in future reporting cycles.

Methodologies and Assumptions

The consumer-related targets were defined based on existing internal practices and systems, such as Elevion’s GRC Compliance Tracker, IT Security Logs, and ESG reporting templates. Assumptions include continued rollout of internal audit procedures, integration of grievance handling into the whistleblowing system, and availability of customer feedback mechanisms in relevant subsidiaries. Where metrics are newly introduced (e.g. transparency reporting or satisfaction surveys), implementation will follow standardised templates and be coordinated by ESG and compliance teams. The targets reflect operational feasibility and are designed to be scalable across Elevion’s diverse business units.

Implementation and Oversight

- The **Governance, Risk & Compliance (GRC)** department oversees target implementation and monitoring.
- Subsidiaries integrate these targets into local project plans and product development cycles.
- Progress is reviewed annually through **internal audits, ESG reporting, and management reviews**.



GOVERNANCE



ESRS G1 BUSINESS CONDUCT





GOVERNANCE

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 GOV-1 – THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

The governance structure and responsibilities of Elevion Group B.V. are described below under 'Disclosure Requirement GOV-1 – The role of the administrative, management, and supervisory bodies', in alignment with ESRS 2 GOV-1.

Oversight of Sustainability Matters

The **Supervisory Board** and **Executive Management** are actively involved in overseeing the integration of ESG principles into Elevion Group's strategy and operations. This includes:

- Monitoring the implementation of the **Compliance Management System (CMS)**, aligned with ISO 37001 and ISO 37301.
- Overseeing the **Governance, Risk & Compliance (GRC)** function, which supports the second line of defence and ensures compliance with legal and ethical standards.
- Ensuring that sustainability risks and opportunities are embedded in strategic planning and risk management processes.

Competence and Training

Elevion Group invests in the continuous development of its governance bodies and employees. In 2024:

- Increase the frequency of employees training in the code of conduct- train at least 95% of employees each year.
- The Group committed to achieving **30% female representation** in central executive and supervisory functions, with active monitoring of diversity metrics.

Audit and Assurance

The Board of Directors and Supervisory Board are responsible for the preparation and fair presentation of the financial statements in accordance with EU-IFRS and Dutch Civil Code. They ensure:

- Adequate internal controls to prevent material misstatements due to fraud or error.
- Assessment of the company's ability to continue as a going concern.
- Oversight of the external audit process and financial reporting integrity.



IMPACT, RISK AND OPPORTUNITY MANAGEMENT

DISCLOSURE REQUIREMENT RELATED TO ESRS 2 IRO-1 – DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

Overview of the Process

Elevation Group has implemented a structured and multi-layered approach to identifying and assessing material impacts, risks, and opportunities (IROs), particularly those related to sustainability and financial performance. This process is embedded within the Group's broader risk management and internal control framework and is aligned with CEZ Group standards.

Materiality Assessment

Materiality is assessed based on its potential to influence the decisions of stakeholders and users of the financial statements. The Group applies professional judgment and scepticism in evaluating the nature, timing, and extent of risks and their potential misstatements. This includes:

- Evaluating fraud risk factors (e.g. financial reporting fraud, asset misappropriation, bribery and corruption)
- Assessing the likelihood and impact of risks on financial and non-financial performance
- Considering both quantitative and qualitative factors, including stakeholder expectations and regulatory developments

Risk Identification and Evaluation

The Group identifies risks through a combination of top-down and bottom-up processes:

- **Strategic risks:**
Assessed in relation to long-term objectives and market dynamics

- **Operational risks:**
Evaluated based on project execution, supply chain reliability, and talent retention
- **Financial and reporting risks:**
Reviewed for accuracy, completeness, and integrity of financial disclosures
- **Regulatory risks:**
Monitored for compliance with applicable laws, including tax, competition, and environmental regulations

Internal Controls and Audit Procedures

Internal controls are designed to mitigate identified risks and are regularly reviewed through internal audits and compliance checks. Specific procedures include:

- Evaluation of journal entries and post-closing adjustments using data analytics
- Testing of revenue recognition estimates and expected credit losses
- Assessment of the effectiveness of fraud prevention controls
- Engagement with key management, the Board of Directors, and the Supervisory Board to validate risk assumptions

Integration with Sustainability and ESG

The Governance, Risk & Compliance (GRC) department plays a central role in integrating ESG-related risks into the Group's overall risk framework. This includes:

- Monitoring environmental and social impacts across operations and supply chains
- Aligning risk assessments with ESG targets and CSRD/ESRS reporting requirements
- Supporting the development of mitigation strategies and opportunity capture in areas such as renewable energy, energy efficiency, and digitalisation

Geographic Exposure to Business Conduct Risks

Elevation Group's business conduct risks vary by geography. For example, whistleblower protection mechanisms are actively implemented

in Germany, where regulatory requirements are stricter. Certain regions may present elevated risks related to supplier conduct, anti-corruption compliance, or ESG screening gaps. These geographic factors are considered in Elevion's risk mapping and supplier engagement strategy, and inform the prioritisation of due diligence and internal controls.

Functional and Segment-Level Risk Differentiation

The IRO process considered functional exposure to sustainability-related risks across Elevion's operations. Key business functions with elevated risk profiles include:

- **Procurement**, especially in Green Energy and Energy for Industry segments, due to supplier ESG performance, sanctions exposure, and circularity obligations.
- **Sales and Business Development**, particularly in Building Energy Solutions, where reputational risks and customer ESG expectations are high.
- **Operations and Project Execution**, across all segments, due to physical climate risks, health and safety, and regulatory compliance. These functions were prioritised in the materiality assessment and are subject to targeted internal controls, supplier screening, and ESG integration measures. The mapping of IROs to business segments is described in SBM-1 and supports Elevion's strategic sustainability goals.

DISCLOSURE REQUIREMENT

G1-1— POLICIES RELATED TO BUSINESS CONDUCT

G1-1a: Governance Policies and Culture

The Elevion Group upholds its corporate culture through various policies. The Governance, Risk and Compliance, led by its head of the department, is responsible for ensuring that the group complies with all ethical and legal standards. This oversight applies to all Elevion subsidiaries. These standards are also embedded in the Elevion Group **Code of Conduct which aligns with**, international conventions of the International Labour Organisation, the United Nations, and international human rights agreements.

The company has identified a strong corporate culture as having a positive impact (IRO table – positive impact). One of the tools used to cultivate a culture that emphasises integrity and responsibility is the company's Code of Conduct. This culture is integral to the company's identity and guides the behaviour of its workforce. The Governance, Risk & Compliance Department periodically reviews the content of this policy and initiate any necessary changes. To ensure adherence to the Code of Conduct, the **Whistleblowing** system is available to all, including employees and third parties, as a reporting channel. This **policy** applies to all members of the statutory body, employees including subsidiaries. The reporting line is accessible via a link on the company website and is provided by the FaceUp Platform. Whistleblowers are protected from retaliation, and their crucial role in detecting and preventing misconduct is acknowledged. The Whistleblowing System is monitored by the Governance, Risk & Compliance team, who receive reports in the compliance investigation and take the initial action. They impose corrective measures if necessary and monitor their implementation afterwards.

The Elevion Group is committed to protecting whistleblowers, promoting transparency and accountability within its operations,

thereby enhancing its ability to detect and address misconduct effectively. This commitment is recognised as another **positive impact** (IRO table – positive impact).

The company ensures the effectiveness of its remediation and whistleblowing processes through:

- Daily monitoring of the whistleblowing platform by the GRC department.
- Structured investigation procedures, including initial assessment, planning, and documentation of findings.
- Corrective measures are tracked in internal systems with deadlines and responsible persons clearly assigned.
- Follow-up monitoring is conducted by GRC to ensure implementation, with escalation to the Director of GRC if deadlines are missed.
- Annual management reviews and internal audits assess the adequacy and sustainability of the system.

If Elevion identifies that it has caused a negative impact, the GRC department initiates a Compliance Incident Investigation to:

- Assess the nature and scope of the impact.
- Define and implement Corrective Measures in coordination with relevant stakeholders.
- Monitor the resolution and ensure non-recurrence through systemic improvements.
- Communicate outcomes to affected parties, including whistleblowers, where appropriate.

Elevion promotes awareness and trust in its whistleblowing and compliance structures through:

- Public availability of the Whistleblowing System via the company website.
- Clear communication of rights and protections for whistleblowers, including non-retaliation.
- Regular compliance training for employees and managers.
- Monitoring stakeholder expectations via interviews, surveys, and legislative analysis (as outlined in the Anti-Corruption Management System Policy).

Furthermore, training is provided to all employees through e-learning. Additionally, mandatory training on the Code of Conduct is delivered to all employees via digital platforms.

Training on the Code of Conduct is provided to every new employee during onboarding and is repeated regularly for all staff. The training is comprehensive, covering expected standards of behaviour, reporting channels, and the company's zero-tolerance approach to misconduct. Managing Directors receive additional training focused on governance, compliance, and anti-corruption responsibilities. In this regard, Elevion Group has developed and implemented an Anti-Corruption policy covering main principles regarding to managing employees' integrity and preventing the conflict of interest.

Functions identified as being most exposed to corruption and bribery risks include procurement, project management, and sales/business development, particularly where there is decision-making authority over contracts or financial transactions. These roles are subject to enhanced compliance oversight, including targeted training and regular conflict of interest checks (compliance checks). Furthermore, these roles are regularly audited by internal (ČEZ) audit department and corrective measures are being tracked and fulfilled.

Stakeholder Consideration in Governance Policy Setting

Elevion Group acknowledges that governance policies — including the Code of Conduct, Anti-Corruption Policy, Supplier Code of

Conduct, and Whistleblower Protection Policy — must reflect the interests of key stakeholders. While formal stakeholder involvement in policy drafting is still evolving, the following practices were applied in 2024:

Internal Stakeholder Consideration:

- Governance policies were developed and reviewed by the **Governance, Risk & Compliance (GRC)** department in consultation with **HR, Procurement**, and **ESG** teams.
- Feedback from **employees** was considered through onboarding processes, compliance training participation, and internal audits.
- **Management Board members** were involved in policy approval and oversight, ensuring alignment with Elevion's strategic direction and ČEZ Group standards.

External Stakeholder Consideration:

- **Suppliers** were engaged through ESG questionnaires and onboarding procedures, which informed the development of the Supplier Code of Conduct and screening criteria.
- **Customers and municipalities** provided input indirectly via contractual ESG clauses and project-level consultations.
- **ČEZ Group**, as the sole shareholder, provided strategic guidance through its Vision 2030 framework, which Elevion's governance policies are aligned with.

Planned Improvements: Starting in 2026, Elevion Group will implement a **structured annual stakeholder dialogue process**, which will include:

- Formal consultations with suppliers and customers on governance expectations,
- Employee feedback loops on ethical conduct and compliance mechanisms,
- Integration of stakeholder insights into policy updates and ESG Steering Committee reviews.

These steps aim to ensure that governance policies are not only compliant and effective but also responsive to stakeholder expectations and material ESG risks.

G1-1b: Governance Actions and Implementation Timeframes for Governance Actions

Elevion Group has initiated several governance-related actions in 2024, including the rollout of updated anti-corruption training modules, supplier ESG screening procedures, and whistleblower system enhancements. However, **formal timeframes for completion of these actions have not yet been set.**

The implementation of these measures is currently coordinated by the Governance, Risk & Compliance (GRC) department and the ESG Steering Committee. Timeframes will be defined in the course of 2025 as part of:

- The structured stakeholder dialogue process,
- The ESG governance roadmap,
- Integration of ESG KPIs into internal audit and performance review cycles.

Resources and Dependencies

At present, Elevion Group has **not yet quantified the OPEX or CAPEX** associated with governance-related actions such as training programmes, policy implementation, or compliance audits. Similarly, **no dedicated financing instruments** have been allocated to these activities in the 2024 reporting cycle.

The Group acknowledges that governance actions may depend on:

- Availability of internal compliance resources,
- Subsidiary-level capacity to implement training and controls,
- Supplier cooperation in ESG screening and onboarding.

These dependencies will be assessed in more detail in 2025/2026, as Elevion expands its ESG budgeting framework and integrates governance-related actions into financial planning and risk management processes.

DISCLOSURE REQUIREMENT G1-2 – MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

G1-2a: General comments on management of relationships with suppliers

Our company is committed to fostering ethical, sustainable, and resilient supplier relationships, recognising the supply chain as a strategic enabler of innovation and cost efficiency (IRO table – opportunity). Supplier engagement is integral to our ESG strategy, supporting responsible sourcing and long-term value creation. Procurement activities are governed by our Procurement Rules and Supplier Code of Conduct, which ensure transparency, fairness, and alignment with corporate values. The procurement process includes:

1. Preparation of tender documentation
2. Supplier prequalification and qualification
3. Evaluation of submitted offers
4. Selection of the preferred supplier
5. Contract finalisation

To uphold compliance and integrity, supplier checks are conducted via ČEZ compliance (EGBV), excluding purchases below EUR 40,000 (including cumulative daily purchases). Elevion Group further screens suppliers against international sanction lists. A minimum of 30% of evaluation criteria is based on price, ensuring cost-effectiveness alongside quality and sustainability considerations.

Procurement exemptions apply to:

- Business travel (transport and accommodation)
- Representation expenses
- Office supplies
- Purchases below EUR 2,000 annually (cumulative)

We adhere to the principle of competitive procurement, seeking multiple offers where feasible and cost-effective, in line with our governance framework.

G1-2b: Supplier related metrics

Governance-related metrics disclosed in this section are based on data collected centrally from Elevion Group entities.

No external validation of governance-related metrics was performed during the reporting period. All disclosures are based on internal data collection and plausibility checks coordinated by the central ESG team.

To support ESG integration across the supply chain, data on supplier screening against social and environmental criteria is collected from subsidiaries and consolidated at the group level.

Table: Environmental Screening of New Suppliers in the Supply Chain (2024)

Indicators	2024
Number of suppliers screened using environmental criteria	308
Number of suppliers with significant actual or potential environmental impacts	12
Number of suppliers with terminated cooperation or urgent corrective actions following environmental impact assessments	0

Table: Social Screening of New Suppliers in the Supply Chain (2024)

Indicators	2024
Number of suppliers screened for social impacts	318
Number of suppliers identified with significant actual or potential negative social impacts and risks	12
Number of suppliers with terminated cooperation or urgent corrective actions following social impact assessments	0

No significant actual impact were identified; mostly potential risks were based on secondary risk factors. Hence no supplier relationships were terminated, and no urgent corrective actions were required in 2024. However, all identified risks were documented and monitored. Suppliers were informed where necessary and encouraged to implement improvements aligned with our social responsibility standards.

Elevion Group applies the ČEZ Group's ESRS-aligned approach to sustainability-related impacts. These refer to actual or potential effects—positive or negative—on governance matters across the company's operations and value chain.

- **Governance impacts** include ethical conduct, anti-corruption, transparency, and regulatory compliance. This classification is consistent with ČEZ Group's methodology, which follows the European Sustainability Reporting Standards (ESRS) and the Corporate Sustainability Reporting Directive (CSRD).

Definition of Key Terms and Metrics

- **Significant Impact (Supplier Screening):** Defined as suppliers with material ESG relevance based on contract value, sector risk, geography, and contribution to Elevion's sustainability footprint.
- **Sustainability-Related (ČEZ Definition):** Includes environmental, social, and governance dimensions aligned with ČEZ Vision 2030, covering decarbonisation, ethical governance, and social responsibility.

Elevion subsidiaries follows systematic approach when it comes to suppliers screening including ISO certifications such as 14001, 45001, 9001, 50001, 27001 or equivalent standards.

Commitment to Ethical Standards and Responsible Partnerships

The Elevion Group is aware of its responsibility and adheres to high ethical standards. These standards apply not only on the individuals and companies operating under the Elevion group but also on business partners. Our pledge to uphold ethical conduct is grounded in the current laws, EU regulations, international treaties, and active regulatory guidelines. It also reflects the latest recommendations and procedures from expert organisations following best practice in legal and ethical area.

The relationship with suppliers is managed through the Supplier Code of Conduct, which underlines the rules of business conduct to suppliers of Elevion Group. We expect our suppliers to maintain the same level of integrity as required from our companies.

Monitoring

The Elevion Group monitors and verifies if the supplier is compliant with its policies and procedures through compliance questionnaires, assurances or external verification.

G1-2c: Supplier related targets

Building on the target already disclosed under ESRS S2, Elevion Group reiterates its commitment to sustainable procurement as a cornerstone of its ESG strategy. Recognising the critical role of suppliers in shaping our environmental and social footprint, we are embedding responsible sourcing practices into our procurement processes and supplier relationships.

Sustainable procurement

- **Target:** Tier 1 supplies to sign Supplier Code of Conduct of the Elevion Group with target of **70% by 2027** and **100% by 2030** across Elevion's **EU operations**, with potential future extension to international subsidiaries.
- **Responsible:** Chief Commercial Officer (strategy), ESG Steering Committee (monitoring)
- **Baseline year:** 2025 is designated as the baseline year, marking the start of formal data collection and performance tracking.
- **Historical evolution:** While the Supplier Code of Conduct was already introduced in prior periods, Elevion Group did not systematically track supplier sign-off rates in 2023 or 2024. Informal implementation began in selected subsidiaries, primarily through ESG onboarding and tender documentation, but no consolidated data was collected. As a result, 2025 has been designated as the formal baseline year for performance tracking. This reflects the start of structured data collection, harmonised reporting templates, and centralised monitoring by the ESG Steering Committee. Historical uptake is assumed to be limited and uneven and will be retrospectively assessed where feasible during the 2025 reporting cycle.
- **Assumptions:** The target assumes continued rollout of the Code of Conduct, integration into procurement processes, and active supplier engagement.
- **Stakeholder Involvement:** Initial target-setting was informed by internal consultations with ESG and procurement teams, and aligned with **ČEZ Vision 2030**. Broader stakeholder input (e.g. suppliers, investors) will be incorporated into future updates.

DISCLOSURE REQUIREMENT G1-3 – PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

Corruption and bribery – Prevention and detection including training

The Elevion Group adheres to its Anti-corruption Management policy. This policy encompasses regulations from the European Union, and the internal principles of our Code of Conduct. It has been identified as an **opportunity** that maintains standards of integrity, fosters

trust among stakeholders, and thereby reduces operational risk (IRO table – opportunity). Another **opportunity** was identified from a perspective where effectively managed incidents can demonstrate the company’s commitment to ethical practices, restoring trust and potentially strengthening resilience and governance practices (IRO table – opportunity).

A regular compliance risk analysis, which includes corruption risk assessment, is conducted to understand the company’s context. The results of this analysis guide our Governance, Risk & Compliance Department priorities and activities. We identify higher-risk job positions and implement additional mechanisms to mitigate these risks.

Our Governance, Risk & Compliance Department plays a crucial role in implementing tools to manage risk of corruption. It also regularly evaluates the effectiveness of these tools. Investigating Compliance incidents is a key component of our ethics and anti-corruption efforts. Additionally, the department identifies, assesses, and reports risks related to breaches of the Code of Conduct within the Risk Assessment process. Investigators and inquiry commissions are always independent from the chain of command associated with the matter under investigation. They report violations within the regular reports designated for the Boards of Directors. To support these efforts, we have established an ad-hoc advisory committee (Corporate Compliance Committee) that provides expertise and assists the Board of Directors in maintaining alignment with internal policies. To further build awareness, we have implemented a mandatory compliance training system for all employees.

The table below shows how many employees split by position have conducted anti-corruption training.

Table 1: Policy Implementation and Communication (2024)

Stakeholder Group	Number of employees to whom Anti-Corruption Policies have been communicated in 2024
Governance Body Members	100
Managers	489
Rank-and-File Employees	4565

Table 2: Anti-Corruption Training Completion (2024)

Stakeholder Group	Number of employees completed Anti-Corruption Training in 2024
Governance Body Members	35
Managers	277
Rank-and-File Employees	2455

Elevion provides mandatory anti-corruption and anti-bribery training to all employees, with comprehensive coverage of relevant risks, reporting obligations, and preventive measures. The training is delivered primarily through e-learning platforms and is repeated regularly to ensure ongoing awareness. Employees in higher-risk roles receive additional targeted training and oversight. Members of the management and supervisory bodies receive regular training on governance, compliance, and anti-corruption responsibilities. This includes updates on legal obligations, internal policies, and oversight duties, ensuring they are equipped to uphold Elevion’s ethical standards and lead by example. Governance-related metrics disclosed in this section are based on data collected centrally from Elevion Group entities.

No external validation of governance-related metrics was performed during the reporting period. All disclosures are based on internal data collection and plausibility checks coordinated by the central ESG team.

DISCLOSURE REQUIREMENT G1-4 – INCIDENTS OF CORRUPTION OR BRIBERY

There were no cases of corruption or bribery reported in 2024 across all entities of Elevion Group B.V.; therefore, the total amount of fines for 2024 is zero. There were also no public legal cases regarding corruption or bribery.

Compliance and Ethical Business Practices

In 2024, there were no recorded cases of non-compliance with laws and regulations, nor any instances of anti-competitive behaviour, anti-trust violations, or monopoly practices. No related complaints were reported, and consequently, no legal actions or fines were imposed.

Anti-corruption and anti-bribery training programmes

- **Nature and Scope of Training:**
Anti-corruption and anti-bribery training is integrated into the broader ethics and compliance training framework. It includes topics such as the Code of Conduct, conflict of interest management, and reporting mechanisms (e.g. whistleblowing channels). Training is delivered primarily via e-learning platforms and is mandatory for all new employees, with periodic refreshers for existing staff based on role and risk exposure.
- **Functions-at-Risk:**
Functions identified as most exposed to corruption and bribery risks include **procurement, project management, and sales/business development**. These functions are prioritised for targeted training and oversight.

Note: The **percentage of functions-at-risk currently covered by anti-corruption training is not yet available**. Elevion Group is working to enhance its HR systems to enable more granular tracking of training coverage by function.

DISCLOSURE REQUIREMENT G1-5 – POLITICAL INFLUENCE AND LOBBYING ACTIVITIES

Political Contributions

Elevion Group does not make any financial or in-kind contributions to political parties, politicians, or related organisations. This policy applies across all jurisdictions in which the Group operates and reflects our commitment to neutrality and ethical business conduct. No donations were made in 2024, and none are planned or budgeted for future periods.

Lobbying Registration and Activities

Elevion Group is registered in Germany (Lobbyregister) as an entity involved in lobbying activities, in accordance with applicable national legislation. This registration ensures transparency in our interactions with public authorities and reflects our role in contributing to the

development of energy and decarbonisation policy frameworks. Elevion Group is part of the CEZ, a.s. which is registered in EU Transparency Register (REG Number: 310282849811-01). Our lobbying efforts are focused exclusively on promoting sustainable energy solutions, energy efficiency, and decarbonisation strategies. These activities are conducted through professional associations and industry platforms, and are aligned with our ESG commitments and the EU Green Deal objectives.

Governance and Oversight

All lobbying activities are subject to internal governance and oversight by the Group's Legal and Governance, Risk & Compliance departments. Elevion Group adheres to strict ethical standards, including the Code of Conduct and Anti-Corruption Policy, which prohibit undue influence or unethical engagement with public officials.

Transparency and Integrity

Elevion Group supports transparent policy-making and does not engage in any form of covert or unethical lobbying. We disclose our lobbying registration and ensure that all interactions with public authorities are documented and compliant with applicable laws.

Appointments of Public Officials

During the reporting period, no members of the administrative, management, or supervisory bodies of Elevion Group B.V. held comparable positions in public administration. This includes national, regional, or local government roles, as well as positions in regulatory or legislative bodies.

DISCLOSURE REQUIREMENT G1-6 – PAYMENT PRACTICES

Timely Payments to SMEs

Elevion Group is committed to transparent and responsible payment practices, in accordance with contractual provisions and business terms. We understand the importance of timely payments for small and medium-sized enterprises (SMEs), which form a significant part of our supplier network. The Group acts responsibly towards its suppliers and strives to prevent late payments.

Standard payment terms range between 30 and 60 days, depending on individual contractual agreements.

Elevion does not currently apply a formal supplier categorisation system for payment terms. The Group acknowledges that it **does not yet track the percentage of payments aligned with standard terms**, but is committed to improving transparency in this area. To that end, Elevion plans to develop a **Group-wide Payment Policy** that will define standard terms, exceptions, and monitoring procedures across all the subsidiaries.

Late-payment Prevention Policy

Elevion Group does not currently maintain a formal group-wide policy specifically focused on late-payment prevention.

Elevion Group recognises the importance of formalising this aspect of supplier relationship management and plans to assess the implementation of a dedicated late-payment prevention policy in the next reporting cycle. This initiative will be aligned with Elevion's broader ESG and responsible sourcing framework.

Days Payable Outstanding

In addition to the required disclosure of average payment time,

Elevion Group monitors Days Payable Outstanding (DPO) as a financial metric. In 2024, this indicator — calculated as trade payables divided by relevant monthly costs, multiplied by the number of days in the month—was 52 days as a monthly average. This metric complements our understanding of payment efficiency and working capital management.

As of 31 December 2024, Elevion Group was not involved in any legal proceedings initiated by suppliers due to late payments. Supplier disputes during the reporting period were primarily related to the quality of work delivered, rather than payment practices.

Stakeholder Engagement on Payment Practices and Whistleblowing System

Elevion Group engages with suppliers through regular contractual interactions, annual evaluations, and project-level feedback mechanisms. Supplier expectations regarding payment terms, invoicing procedures, and dispute resolution are collected during onboarding and through ongoing relationship management. These insights inform the Group's procurement policies and payment practices. Elevion is committed to maintaining open communication with suppliers and continuously improving its payment processes to support financial stability, particularly for small and medium-sized enterprises (SMEs). In parallel, Elevion Group maintains a Group-wide whistleblowing system accessible to all employees and external stakeholders via the Integrity Line. The system is managed independently by the Compliance Department and complies with the EU Whistleblower Protection Directive. It includes clear non-retaliation guarantees and disciplinary consequences for violations.

This integrated approach ensures that Elevion's payment practices and ethical standards are supported by robust governance, transparency, and continuous improvement mechanisms.

Financial Aspects and Dependencies

However, the Group operates a **centralised cash-pooling system**, with a **global financial institution** as the cash-pool operator. This structure supports liquidity management and enables timely payments across subsidiaries. As such, Elevion Group acknowledges a **dependency on this financial institution** for the execution of supplier payments and overall cash flow coordination.

Appendix- 1: List of Elevion subsidiaries consolidated

Alexander Ochs Wärmetechnik GmbH
AMPRO Medientechnik GmbH
Ampro Projektmanagement GmbH
AxE AGRICOLTURA PER L'ENERGIA SOCIETA' AGRICOLA A R.L.
Bechem & Post Wärmetechnik Kundendienst GmbH
BELECTRIC ESPAÑA, S.L.
Belectric France S.A.R.L.
BELECTRIC GmbH
BELECTRIC Greenvest GmbH
Belectric Israel Ltd.
Belectric Italia Srl
Belectric Solar Ltd.
Brandt GmbH
Bücker & Essing GmbH
BUDRIO GFE 312 SOCIETA' AGRICOLA S.R.L.
CDR MP S.R.L.
D-I-E Elektro AG
EAB Elektroanlagenbau GmbH Rhein/Main
E-City Polska sp. z o.o.
Elektro Hofmockel Verwaltungsgesellschaft mit beschränkter Haftung
Elektro-Decker GmbH
Elevion Co-Investment GmbH & Co. KG
Elevion Deutschland Holding GmbH
Elevion Energy & Engineering Solutions GmbH
Elevion GmbH
Elevion Green GmbH
Elevion Group B.V.
Elevion Holding Italia Srl
Elevion Österreich Holding GmbH
En.plus GmbH
Energy Shift B.V.
Entract Energy GmbH
Energy Shift Installaties B.V.
ETS Efficient Technical Solutions GmbH
ETS Efficient Technical Solutions Shanghai Co. Ltd.
ETS Engineering Kft.
Euroklimat sp. z o.o.
GEE- Green Energy Efficiency GmbH
GESPA GmbH
GWE Verwaltungs GmbH

GWE Wärme- und Energietechnik GmbH
Hermos AG
HERMOS International GmbH
Hermos Schaltanlagen GmbH
HERMOS SDN. BHD
Hermos sp. z o.o.
Hermos Systems GmbH
High-Tech Klima S.A.
Hofmockel Automatisierungs- und Prozesstechnik GmbH
Hybridkraftwerk Culemeyerstraße Projekt GmbH
IBP Ingenieure GmbH
IBP Verwaltungs GmbH
inewa consulting Srl
inewa Srl
Instal Bud Pecyna Sp. z o.o.
Kofler Energies Ingenieurgesellschaft mbH
M&P Real GmbH
Metrolog sp. z o.o.
Moser & Partner Ingenieurbüro GmbH
MT Energy Service GmbH
MWB Power GmbH
NEK Facility Management GmbH
OEM Energy sp. z o.o.
Pantegra Ingenieure GmbH
Peil und Partner Ingenieure GmbH
Project X S.r.l.
Rudolf Fritz GmbH
SERCOO ENERGY GmbH
SERCOO Group GmbH
SOCIETA' AGRICOLA B.T.C. S.R.L.
SOCIETA' AGRICOLA DEF S.R.L.
Societa' Agricola Falgas S.r.l.
Solarkraftwerk Deubach GmbH & Co. KG
Solarkraftwerk Reddehausen GmbH & Co. KG
SYNECO PROJECT S.r.l.
Syneco tec GmbH
SYNECOTEC Deutschland GmbH
TRIM-TECH TECHNIKA INSTALACJI sp. z o. o.
Wagner Consult GmbH
ZOHD Groep B.V.

Appendix 2 - Abbreviation table

Abbreviation	Meaning
A.1 / A.2	EU Taxonomy categories (Aligned / Eligible but not aligned)
B2B	Business-to-Business
BESS	Battery Energy Storage System
CAPEX	Capital Expenditure
CCM	Climate Change Mitigation (EU Taxonomy code)
CCO	Chief Commercial Officer
CDP	Carbon Disclosure Project
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CH₄	Methane (GHG component)
CHP	Combined Heat and Power (cogeneration)
CO₂e	Carbon Dioxide Equivalent
COO	Chief Operating Officer
CSRD	Corporate Sustainability Reporting Directive
CTO	Chief Technology Officer
DMA	Double Materiality Assessment
DNSH	Do No Significant Harm
E (Taxonomy)	Enabling Activity (EU Taxonomy)
EIA	Environmental Impact Assessment
EL	TaxonomyEligible (not aligned)
EPC	Engineering, Procurement and Construction
EPR	Extended Producer Responsibility
ESCO	Energy Service Company
ESG	Environmental, Social and Governance
ESRS	European Sustainability Reporting Standards
EU	European Union
EUIFRS	International Financial Reporting Standards (EU adopted)
EULE	EU Biodiversity Certification / Ecology Label (PV context)
FTE	FullTime Equivalent
GDPR	General Data Protection Regulation
GHG	Greenhouse Gas
GRC	Governance, Risk and Compliance
H&S	Health and Safety

Abbreviation	Meaning
HR	Human Resources
HRIS	Human Resources Information System
HVAC	Heating, Ventilation and Air Conditioning
IAS	International Accounting Standard
IFRS	International Financial Reporting Standards
ISO 9001	Quality Management Systems Standard
ISO 14001	Environmental Management Systems Standard
ISO 45001	Occupational Health & Safety Standard
ISO 50001	Energy Management Systems Standard
KPI	Key Performance Indicator
kWh / MWh / GWh	Energy units (kilo-, mega-, gigawatt hour)
N/EL	Not Eligible / Not Aligned (EU Taxonomy)
NGO	Non-Governmental Organisation
O&M	Operation and Maintenance
OPEX	Operating Expenditure
OHS	Occupational Health & Safety
PPA	Power Purchase Agreement
PP&E	Property, Plant & Equipment
PV	Photovoltaic
R&D	Research and Development
RCP 4.5 / RCP 8.5	Representative Concentration Pathway Climate Scenarios
S1 / S2 / S3 / S4	ESRS Social Standards (Own Workforce / Value-chain workers / Affected Communities / Consumers & End Users)
SDG	Sustainable Development Goal
SG&A	Selling, General and Administrative Expenses
SME	Small and Mediumsized Enterprise
tCO₂e	Tonnes of CO ₂ equivalent
tEUR	Thousand Euros
T (Taxonomy)	Transitional Activity (EU Taxonomy)
UNGPs	UN Guiding Principles on Business and Human Rights
VAT	Value Added Tax
WTR	Water-related EU Taxonomy Activity Code
Whistleblowing System (IntegrityLine)	Elevion's reporting channel for misconduct

Appendix 3

The table below provides an overview of the ESRS disclosure requirements addressed in this sustainability statement (so-called “ESRS Index”). It includes references to the relevant sections of the report and, where applicable, indicates intersections with other EU legislation (e.g. EU Taxonomy, SFDR). This mapping ensures transparency and facilitates auditability.

ESRS chapter	Disclosure requirement	Comment	Incorporation by reference	Due diligence	SFDR reference, Pillar 3 reference, Benchmark Regulation reference, EU Climate Law reference	Page
ESRS 2 BP-1	General basis for preparation of sustainability statements					10-11
ESRS 2 BP-2	Disclosures in relation to specific circumstances					11-12
ESRS 2 GOV-1	The role of the administrative, management and supervisory bodies		Elevion Group Annual report 2024, reference to executive management – p.15 et ff		SFDR, Benchmark Regulation	14-16
ESRS 2 GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies					16
ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes					16-18,44
ESRS 2 GOV-4	Statement on due diligence			General comments on due diligence, incl. integration into governance, strategy and business model, stakeholder engagement, etc.	SFDR	18-19
ESRS 2 GOV-5	Risk management and internal controls over sustainability reporting					19
ESRS 2 SBM-1	Strategy, business model and value chain		Elevion Group Annual report 2024, reference to operating segments – p.133 et ff		SFDR, Pillar 3, Benchmark Regulation	20-21
ESRS 2 SBM-2	Interests and views of stakeholders					21-22
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model				SFDR	22-25
ESRS 2 IRO-1	Description of the process to identify and assess material impacts, risks and opportunities					26-29
ESRS 2 IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement					29,152
EU Taxonomy			Elevion Group Annual report 2024, reference to various items listed in the relevant chapter			34-41
ESRS E1-1	Transition plan for climate change mitigation				Pillar 3, Benchmark Regulation, EU Climate Law	46-47
ESRS 2 IRO-1 (E1)	Description of the processes to identify and assess material climate-related impacts, risks and opportunities					47
ESRS 2 SBM-1 (E1)	Strategy, Business Model and Value Chain					47
ESRS 2 SBM-2 (E1)	Interests and views of stakeholders					48
ESRS 2 SBM-3 (E1)	Material impacts, risks and opportunities and their interaction with strategy and business model					48
ESRS E1-2	Policies related to climate change mitigation and adaptation					50-51
ESRS E1-3	Actions and resources in relation to climate change policies					51-52

ESRS E1-4	Targets related to climate change mitigation and adaptation		SFDR, Pillar 3, Benchmark Regulation	52-54
ESRS E1-5	Energy consumption and mix		Elevion Group Annual report 2024, net revenues – p.72 SFDR	55-56
ESRS E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	Scope 3 – will be disclosed in future reporting cycles	Elevion Group Annual report 2024, net revenues – p.72 SFDR, Pillar 3, Benchmark Regulation	57-58
ESRS E1-8	Internal carbon pricing	Disclosure included under E1-6		57-58
ESRS E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Phase-in applied.		58-61
ESRS 2 IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	Not material for Elevion Group, not disclosed		-
ESRS E2-1	Policies related to pollution	Not material for Elevion Group, not disclosed		-
ESRS E2-2	Actions and resources related to pollution	Not material for Elevion Group, not disclosed		-
ESRS E2-3	Targets related to pollution	Not material for Elevion Group, not disclosed		-
ESRS E2-4	Pollution of air, water and soil	Not material for Elevion Group, not disclosed	SFDR	-
ESRS E2-5	Substances of concern and substances of very high concern	Not material for Elevion Group, not disclosed		-
ESRS E2-6	Anticipated financial effects from pollution-related impacts, risks and opportunities	Not material for Elevion Group, not disclosed		-
ESRS 2 IRO-1 (E3)	Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities			66
ESRS E3-1	Policies related to water and marine resources		SFDR	61
ESRS E3-2	Actions and resources related to water and marine resources			67
ESRS E3-3	Targets related to water and marine resources		SFDR	68
ESRS E3-4	Water consumption			68-70
ESRS E3-5	Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	Phase-in applied.		70-71
ESRS 2 SBM-1 (E4)	Strategy, Business Model and Value Chain	Not material for Elevion Group, partial disclosures on voluntary basis.		74
ESRS 2 SBM-2 (E4)	Interests and views of stakeholders	Not material for Elevion Group, partial disclosures on voluntary basis.		74
ESRS 2 E4-1 (E4)	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	Not material for Elevion Group, partial disclosures on voluntary basis.		74

ESRS 2 SBM-3 (E4)	Material impacts, risks and opportunities and their interaction with strategy and business model	Not material for Elevion Group, partial disclosures on voluntary basis.		75
ESRS 2 IRO-1 (E4)	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	Not material for Elevion Group, partial disclosures on voluntary basis.		75
ESRS E4-2	Policies related to biodiversity and ecosystems	Not material for Elevion Group, partial disclosures on voluntary basis.	SFDR	75
ESRS 2 E4-3	Actions and resources related to biodiversity and ecosystems	Not material for Elevion Group, partial disclosures on voluntary basis.		76
ESRS 2 E4-4	Targets related to biodiversity and ecosystems	Not material for Elevion Group, partial disclosures on voluntary basis.		77
ESRS 2 E4-5	Impact metrics related to biodiversity and ecosystems change	Not material for Elevion Group, partial disclosures on voluntary basis.		77
ESRS 2 E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	Not material for Elevion Group, partial disclosures on voluntary basis.		77
ESRS 2 IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities			82
ESRS E5-1	Policies related to resource use and circular economy			82-83
ESRS E5-2	Actions and resources related to resource use and circular economy			83-84
ESRS E5-3	Targets related to resource use and circular economy			86
ESRS E5-4	Resource inflows			86-87
ESRS E5-5	Resource outflows		SFDR	87-88
ESRS E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	Phase-in applied.		88-89
ESRS 2 SBM-1 (S1)	Strategy, Business Model and Value Chain			94
ESRS 2 SBM-2 (S1)	Interests and views of stakeholders			94-95
ESRS 2 SBM-3 (S1)	Material impacts, risks and opportunities and their interaction with strategy and business model			95
ESRS S1-1	Policies related to own workforce		SFDR, Benchmark Regulation	96-98
ESRS S1-2	Processes for engaging with own workforce and workers' representatives about impacts			98-99
ESRS S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns		SFDR	99

ESRS S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions		SFDR, Bechnmark Regulation	99-101
ESRS S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities			102-103
ESRS S1-6	Characteristics of the undertaking's employees		Elevion Group Annual report 2024, reference to headcount – p.126	130-105
ESRS S1-7	Characteristics of non-employees in the undertaking's own workforce	Phase-in applied		105
ESRS S1-8	Collective bargaining coverage and social dialogue	Not material for Elevion Group, disclosed on voluntary basis.		105-106
ESRS S1-9	Diversity metrics			106
ESRS S1-10	Adequate wages	Not material for Elevion Group, disclosed on voluntary basis.	Due diligence with respect to adequate wages of non-employees	106-107
ESRS S1-11	Social protection	Not material for Elevion Group, disclosed on voluntary basis.		107
ESRS S1-12	Persons with disabilities			107-108
ESRS S1-13	Training and skills development metrics			108
ESRS S1-14	Health and safety metrics		SFDR, Benchmark Regulation	108-109
ESRS S1-15	Work-life balance metrics	Not material for Elevion Group, partial disclosures on voluntary basis		109
ESRS S1-16	Remuneration metrics (pay gap and total remuneration)	Phase-in partially applied due to methodology	SFDR, Benchmark Regulation	109-110
ESRS S1-17	Incidents, complaints and severe human rights impacts		SFDR, Benchmark Regulation	111
ESRS 2 SBM-1 (S2)	Strategy, Business Model and Value Chain			114
ESRS 2 SBM-2 (S2)	Interests and views of stakeholders			114
ESRS 2 SBM-3 (S2)	Material impacts, risks and opportunities and their interaction with strategy and business model			114-115
ESRS S2-1	Policies related to value-chain workers		SFDR, Benchmark Regulation	116-117
ESRS S2-2	Processes for engaging with value-chain workers about impacts		Due diligence processes related to supplier workforce engagement practices	117-118
ESRS S2-3	Processes to remediate negative impacts and channels for value-chain workers to raise concerns			118
ESRS S2-4	Taking action on material impacts on value-chain workers, and approaches to managing material risks and pursuing material opportunities related to value-chain workers, and effectiveness of those actions	Phase-in applied	SFDR	119
ESRS S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Phase-in applied		120
ESRS 2 SBM-1 (S3)	Strategy, Business Model and Value Chain	Not material for Elevion Group, partial disclosures on voluntary basis.		124

ESRS 2 SBM-2 (S3)	Interests and views of stakeholders	Not material for Elevion Group, partial disclosures on voluntary basis.		124
ESRS 2 SBM-3 (S3)	Material impacts, risks and opportunities and their interaction with strategy and business model	Not material for Elevion Group, partial disclosures on voluntary basis.		124
ESRS S3-1	Policies related to affected communities	Not material for Elevion Group, partial disclosures on voluntary basis.	SFDR, Benchmark Regulation	126
ESRS S3-2	Processes for engaging with affected communities about impacts	Not material for Elevion Group, , partial disclosures on voluntary basis.		126
ESRS S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Not material for Elevion Group, partial disclosures on voluntary basis.		127
ESRS S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Not material for Elevion Group, partial disclosures on voluntary basis.	SFDR	127
ESRS 2 SBM-1 (S4)	Strategy, Business Model and Value Chain			130
ESRS 2 SBM-2 (S4)	Interests and views of stakeholders			130
ESRS 2 SBM-3 (S4)	Material impacts, risks and opportunities and their interaction with strategy and business model			130
ESRS S4-1	Policies related to consumers and end-users		SFDR, Benchmark Regulation	132-133
ESRS S4-2	Processes for engaging with consumers and end-users about impacts			133
ESRS S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns			133
ESRS S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions		SFDR	134
ESRS S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities			136
ESRS 2 GOV-1	The role of the administrative, supervisory and management bodies			142
ESRS 2 IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities		Due diligence related to business conduct risk	144-145
ESRS G1-1	Business conduct policies and corporate culture			145-146
ESRS G1-2	Management of relationships with suppliers		SFDR	146-147
ESRS G1-3	Prevention and detection of corruption and bribery			147-148
ESRS G1-4	Incidents of corruption or bribery		SFDR, Benchmark Regulation	148
ESRS G1-5	Political influence and lobbying activities	Not material for Elevion Group, disclosed on voluntary basis		148-149
ESRS G1-6	Payment practices			149

Appendix 4: EU Taxonomy Key Performance Indicators

Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering the year 2024

Financial year 2024	Year		Substantial contribution criteria								DNSH criteria ('Does Not Significantly Harm')								
Economic Activities (1)	Code (2)	Turnover (3)	Proportion of Turnover, year 2024 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy-aligned (A.1) or eligible (A.2) Turnover, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
Text	tEUR		%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Manufacture of energy efficiency equipment for buildings	CCM 3.5	2 923	0,2%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0,0%	E	
Electricity generation using solar photovoltaic technology	CCM 4.1	280 920	22,0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	21,4%		
Storage of electricity	CCM 4.10	23	0,0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0,0%	E	
Cogeneration of heat/cool and power from bioenergy	CCM 4.20	9 441	0,7%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0,4%		
Construction, extension and operation of waste water collection and treatment	CCM 5.3	562	0,0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0,0%	E	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	432	0,0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0,0%	E	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	0	0,0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1,0%	E	
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	65 291	5,1%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	3,6%	E	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	12 289	1,0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	2,0%	E	

Professional services related to energy performance of buildings	CCM 9.3	30 171	2,4%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	2,2%	E
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		402 053	31,5%	31,5%	0,0%	0,0%	0,0%	0,0%	0,0%								30,7%	
of which Enabling		111 692	8,8%	8,8%	0,0%	0,0%	0,0%	0,0%	0,0%								8,8%	E
of which Transitional		-	0,0%	0,00%													0,0%	T
A.2 Taxonomy-eligible but not environmentally sustainable (not Taxonomy-aligned activities)																		
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL									
Manufacture of energy efficiency equipment for buildings	CCM 3.5	33 830	2,7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								5,5%	
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	19 607	1,5%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,8%	
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	13 498	1,1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,9%	
Construction, extension and operation of waste water collection and treatment	CCM 5.3	1 002	0,1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,0%	
Construction of new buildings	CCM 7.1	0	0,0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,0%	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	268 326	21,1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								19,3%	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	15 771	1,2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,0%	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	925	0,1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,2%	
Professional services related to energy performance of buildings	CCM 9.3	5 706	0,4%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,5%	
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		358 664	28,1%	27,2%	0,0%	0,0%	0,0%	0,0%	0,0%								27,2%	
A. Turnover of Taxonomy-eligible activities (A.1+A.2)		760 716	59,7%	57,9%	0,0%	0,0%	0,0%	0,0%	0,0%								57,9%	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																		
Turnover of Taxonomy-non-eligible activities		513 716	40,3%															
Total		1 274 433	100,0%															

Proportion of CAPEX from products or services associated with Taxonomy-aligned economic activities – disclosure covering the year 2024

Financial year 2024	Year		Substantial contribution criteria								DNSH criteria ('Does Not Significantly Harm')									
Economic Activities (1)	Code (2)	CAPEX (3)	Proportion of CAPEX, year 2024 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy-aligned (A.1) or eligible (A.2) CAPEX, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)	
Text	tEUR	%		Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T	
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
Electricity generation using solar photovoltaic technology	CCM 4.1	2 747	3,9%	Y	N	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	19,1%			
Storage of electricity	CCM 4.10	229	0,3%	Y	N	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	0,0%	E		
Cogeneration of heat/cool and power from bioenergy	CCM 4.20	4 910	7,0%	Y	N	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	1,4%			
CAPEX of environmentally sustainable activities (Taxonomy-aligned)		7886	11,2%	11,2%	0%	0%	0%	0%	0%								20,5%			
of which Enabling		229	0,3%	0,3%	0%	0%	0%	0%	0%								0,0%	E		
of which Transitional		-	0,0%	0,0%													0,0%		T	
A.2 Taxonomy-eligible but not environmentally sustainable (not Taxonomy-aligned activities)																				
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL											
Manufacture of energy efficiency equipment for buildings	CCM 3.5	911	1,3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,0%			
Electricity generation using solar photovoltaic technology	CCM 4.1	1760	2,5%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,0%			
Cogeneration of heat/cool and power from bioenergy	CCM 4.20	-	0,0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								5,1%			
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	7867	11,2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								19,8%			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	42	0,1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,0%			
Data-driven solutions for GHG emissions reductions	CCM 8.2	5724	8,1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,0%			

CAPEX of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)	16 305	23,1%	23,1%	0,0%	0,0%	0,0%	0,0%	0,0%	24,9%
A. CAPEX of Taxonomy-eligible activities (A.1+A.2)	24 191	34,3%	34,3%	0,0%	0,0%	0,0%	0,0%	0,0%	45,4%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES									
CAPEX of Taxonomy-non-eligible activities	46 274	65,7%							
Total	70 465	100,0%							

Financial year 2024	Year		Substantial contribution criteria										DNSH criteria ('Does Not Significantly Harm')						
Economic Activities (1)	Code (2)	OPEX (3)	Proportion of OPEX, year 2024 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy-aligned (A.1) or eligible (A.2) OPEX, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
				Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Electricity generation using solar photovoltaic technology	CCM 4.1	254	2%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	35,7%		
Cogeneration of heat/cool and power from bioenergy	CCM 4.20	840	6,7%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%		
OPEX of environmentally sustainable activities (Taxonomy-aligned)		1 094	8,7%	8,7%	0%	0%	0%	0%	0%								35,7%		
of which Enabling		-	0,0%	0%	0%	0%	0%	0%	0%								0%	E	
of which Transitional		-	0,0%	0%													0%		T
A.2 Taxonomy-eligible but not environmentally sustainable (not Taxonomy-aligned activities)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	1 525	12,1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								2,3%		
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	-	0,0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								5,1%		
Data-driven solutions for GHG emissions reductions	CCM 8.2	211	1,7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
OPEX of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		1 736	13,8%	13,8%	0,0%	0,0%	0,0%	0,0%	0,0%								7,4%		
A. OPEX of Taxonomy eligible activities (A.1+A.2)		2 830	22,4%	22,4%	0,0%	0,0%	0,0%	0,0%	0,0%								43,1%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OPEX of Taxonomy-non-eligible activities		9 778	77,6%																
Total		12 608	100,0%																

TEMPLATE 1 NUCLEAR AND FOSSIL GAS RELATED ACTIVITIES

Row	Nuclear-energy-related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using the best available technologies.	NO
dole3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using gaseous fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using gaseous fossil fuels.	YES
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using gaseous fossil fuels.	YES

TEMPLATE 2 TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (DENOMINATOR)

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the turnover KPI	402 053	31,5%	0	0%	0	0%
8.	Total turnover KPI	1 274 433	100%	0	0%	0	0%

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the CAPEX KPI	7 886	11,2%	0	0%	0	0%
8.	Total CAPEX KPI	70 465	100%	0	0%	0	0%

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the OPEX KPI	1 094	8,7%	0	0%	0	0%
8.	Total OPEX KPI	12 608	100%	0	0%	0	0%

TEMPLATE 3 TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (NUMERATOR)

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the turnover KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the turnover KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the turnover KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the turnover KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the turnover KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the turnover KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the turnover KPI	402 053	100,0%	402 053	100,0%	0	0%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the turnover KPI	402 053	100,0%	402 053	100,0%	0	0%

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CAPEX KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CAPEX KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CAPEX KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CAPEX KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CAPEX KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CAPEX KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the CAPEX KPI	7 886	100,0%	7 886	100,0%	0	0%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the CAPEX KPI	7 886	100,0%	7 886	100,0%	0	0%

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OPEX KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OPEX KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OPEX KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OPEX KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OPEX KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OPEX KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the OPEX KPI	1 094	100,0%	1 094	100,0%	0	0%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the OPEX KPI	1 094	100,0%	1 094	100,0%	0	0%

TEMPLATE 4 TAXONOMY-ELIGIBLE BUT NOT TAXONOMY-ALIGNED ECONOMIC ACTIVITIES

Row	Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	19 607	5,5%	19 607	5,5%	0	0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the turnover KPI	339 057	94,5%	339 057	94,5%	0	0%
8.	Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the turnover KPI	358 664	100,0%	358 664	100,0%	0	0%

Row	Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	7 867	48,3%	7 867	48,3%	0	0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the CAPEX KPI	8 438	51,7%	8 438	51,7%	0	0%
8.	Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the CAPEX KPI	16 305	100,0%	16 305	100,0%	0	0%

Row	Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	1 525	87,8%	1 525	87,8%	0	0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the OPEX KPI	211	12,2%	211	12,2%	0	0%
8.	Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the OPEX KPI	1 736	100,0%	1 736	100,0%	0	0%

TEMPLATE 5 TAXONOMY NON-ELIGIBLE ECONOMIC ACTIVITIES			
Row	Economic activities	Amount	Percentage
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the turnover KPI	0	0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the turnover KPI	513 716	100,0%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the turnover KPI	513 716	100,0%

Row	Economic activities	Amount	Percentage
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CAPEX KPI	0	0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the CAPEX KPI	46 274	100,0%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the CAPEX KPI	46 274	100,0%

Row	Economic activities	Amount	Percentage
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OPEX KPI	0	0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the OPEX KPI	9 776	100,0%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the OPEX KPI	9 776	100,0%

This management report was approved for issuance by the Board of Directors on 26th of June 2025

Mr. Miroslav Šindelář
Director

Mr. Dirk Berand Blik
Director

Mr. Martina Kubežová
Director

Mr. Jaroslav Macák
Managing Director

ELEVION GROUP B.V.

INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT ON CONSOLIDATED SUSTAINABILITY STATEMENT

To the Shareholders, Supervisory Board and Board of Directors of Elevion Group B.V.:

We have conducted a limited assurance engagement on the below specified areas of the Consolidated sustainability statement of Elevion Group B.V. and its subsidiaries (hereafter the "Group") as at 31 December 2024 and for the period from 1 January 2024 to 31 December 2024 (hereafter the "Consolidated Sustainability statement"). The scope of our work covered double materiality assessment process, below mentioned selected European Sustainability Reporting Standards indicators (hereafter "the selected ESRS indicators") presented in the Consolidated Sustainability Statement and disclosures based on the Article 8 of EU Regulation 2020/852 of the European Parliament and of the Council (hereafter the "Taxonomy Regulation").

Selected ESRS indicators

ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities
ESRS 2 - IRO-2 - Disclosure requirements in ESRS covered by the undertaking's sustainability statement
ESRS E1-1 - Transition plan for climate change mitigation
ESRS E1-2 - Policies implemented to manage climate change mitigation and adaptation
ESRS E1-4 - Targets related to climate change mitigation and adaptation
ESRS E1-5 - Total energy produced
ESRS E1-6 - Scope 1 emissions
ESRS E1-6 - Scope 2 emissions location based
ESRS E1-6 - Scope 2 emissions market based
ESRS E3-4 - Water consumption, water withdrawals, water discharges
ESRS E5-5 - Total waste generated
ESRS S1-6 - Characteristics of the undertaking's employees
ESRS S1-8 - Collective bargaining coverage and social dialogue
ESRS S1-9 - Diversity metrics for own workforce
ESRS S1-12 - Persons with disabilities
ESRS S1-13 - Training and skills development metrics
ESRS S1-14 - Health and safety metrics
ESRS S1-17 - Incidents of discrimination and corrective actions taken

Other than described in this report, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Consolidated Sustainability Statement, and accordingly, we do not express a conclusion on any other information included in the Consolidated Sustainability Statement.

Identification of Applicable Criteria

The Consolidated Sustainability Statement was prepared by the Management of the Group on the basis of the European Sustainability Reporting Standards introduced by Commission Delegated Regulation (EU) of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council (hereafter "ESRS"), including that the double materiality assessment process carried out by the Group to identify the information reported in the Consolidated Sustainability Statement (hereafter the "Process") is in accordance with the description set out in Note Disclosure Requirement IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

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including compliance of the disclosures in Article 8 Taxonomy Regulation subsection within the Environment section of the Consolidated Sustainability Statement with Taxonomy regulation.

Inherent Limitations in Preparing the Consolidated Sustainability Statement

The criteria, nature of the Consolidated Sustainability Statement, and absence of long-standing established authoritative guidance, standard applications and reporting practices allow for different, but acceptable, measurement methodologies to be adopted which may result in variances between entities. The adopted measurement methodologies may also impact the comparability of sustainability matters reported by different organisations and from year to year within an organisation as methodologies evolve.

In reporting forward-looking information on the basis of the ESRS, management of the Group is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. The actual outcome is likely to be different since anticipated events frequently do not occur as expected.

In determining the disclosures in the Consolidated Sustainability Statement, management of the Group interprets undefined legal and other terms. Undefined legal and other terms may be interpreted differently, including the legal conformity of their interpretation and, accordingly, are subject to uncertainties.

Responsibilities of Management for the Consolidated Sustainability Statement

Management of the Group is responsible for designing and implementing a process to identify the information reported in the Consolidated Sustainability Statement on the basis of the ESRS and for disclosing this process in Note Disclosure Requirement IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities of the Consolidated Sustainability Statement.

This responsibility includes:

- Understanding the context in which the Group's activities and business relationships take place and developing an understanding of its affected stakeholders;
- The identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- The assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- Making assumptions that are reasonable in the circumstances.

Management of the Group is also responsible for the preparation of the Consolidated Sustainability Statement, which includes:

- Compliance with indicators prepared on the basis of ESRS;
- Preparing the disclosures in Article 8 Taxonomy Regulation subsection of the Consolidated Sustainability Statement, in compliance with Taxonomy regulation;
- Designing, implementing and maintaining such internal controls that management determines are necessary to enable the preparation of the Consolidated Sustainability Statement that is free from material misstatement, whether due to fraud or error; and
- The selection and application of appropriate sustainability reporting methods and making assumptions and estimates about individual sustainability disclosures that are reasonable in the circumstances.

Those charged with governance are responsible for overseeing the Group's sustainability reporting process.

Our Responsibilities

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements other than Audits or Reviews of Historical Financial Information.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether:

- the Process presented in the Consolidated Sustainability Statement is in accordance with the description set out in Note Disclosure Requirement IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities ;
- and whether the Selected ESRS indicators and disclosures in Article 8 Taxonomy Regulation subsection within the Environment section of the Consolidated Sustainability Statement are free from material misstatement, whether due to fraud or error;

and to issue a limited assurance report that includes our conclusion.

Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Consolidated Sustainability Statement as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) we exercise professional judgement and maintain professional scepticism throughout the engagement.

Our responsibilities in respect of the Consolidated Sustainability Statement, in relation to the Process, include:

- Obtaining an understanding of the Process but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process;
- Designing and performing procedures to evaluate whether the Process is consistent with the Group's description of its Process, as disclosed in Note Disclosure Requirement IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities.

Our other responsibilities in respect of the selected ESRS indicators and disclosure in Article 8 Taxonomy Regulation subsection included in the Consolidated Sustainability Statement include:

- Obtaining an understanding of the Group's control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Statement but not evaluating the design of particular control activities, obtaining evidence about their implementation or testing their operating effectiveness;
- Designing and performing procedures responsive to selected ESRS indicators and disclosure in Article 8 Taxonomy Regulation subsection. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Our Independence and Quality Management

We complied with the applicable independence and other ethical requirements of the Act on Auditors and the Code of Ethics adopted by the Chamber of Auditors of the Czech Republic (the "Code"). The Code is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We applied International Standard on Quality Management (ISQM) 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements, and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Summary of the Work Performed

A limited assurance engagement involves performing procedures to obtain evidence about the Consolidated Sustainability Statement.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the Consolidated Sustainability Statement.

In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process by:
 - Performing inquiries to understand the sources of the information used by management; and
 - Reviewing the Group's internal documentation of its Process; and
- Evaluated whether the evidence obtained from our procedures about the Process implemented by the Group was

consistent with the description of the Process set out in Note Disclosure Requirement IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities.
In conducting our limited assurance engagement, with respect to selected ESRS indicators and disclosure in Article 8 Taxonomy Regulation subsection included in the Consolidated Sustainability Statement, we:

- Obtained an understanding of the Group's reporting processes relevant to the preparation of its Consolidated Sustainability Statement by:
 - Performing inquiries to understand the Group's control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Statement;
 - Evaluated whether material information identified by the Process to identify the information reported in the Consolidated Sustainability Statement is included in the Consolidated Sustainability Statement;
 - Performed inquiries of relevant personnel and analytical procedures on selected ESRS indicators in the Consolidated Sustainability Statement;
 - Performed substantive assurance procedures based on a sample basis on selected ESRS indicators in the Consolidated Sustainability Statement;
 - Obtained an understanding of the process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Consolidated Sustainability Statement;
 - Conducted site visits at selected locations to test the application of the Company's reporting procedures.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Limited Assurance Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the selected ESRS indicators in the Consolidated Sustainability Statement are not prepared, in all material respects, in accordance with European Sustainability standards ("ESRS"), including:

- That the process carried out by the Group to identify the information reported in the Consolidated Sustainability Statement is not in accordance with the description set out in Note Disclosure Requirement IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities; and
- That disclosures in Article 8 Taxonomy Regulation subsection within the Environment section are not in accordance with Article 8 of the Taxonomy Regulation.

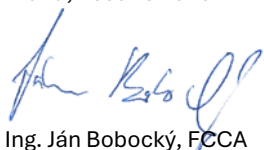
Other Matter

The report has been prepared solely for the information of the Management Board of Elevion Group B.V. on a voluntary basis. The report does not constitute a sustainability statement prepared in accordance with the requirements of ESRS's and does not include all disclosures that would be required if the entity were subject to mandatory reporting as well as it does not comply with the requirements arising from the transposition of the Corporate Sustainability Reporting Directive (CSRD) into Dutch legislation.

Accordingly, the sustainability report has not been prepared in accordance with the applicable Dutch statutory framework for CSRD reporting, including the relevant provisions of the Dutch Civil Code and the European Sustainability Reporting Standards (ESRS) as adopted under that framework. The Company voluntarily opted for the limited assurance engagement related to sustainability reporting.

The report has been designed to meet the specific information needs of management and selected stakeholders and may not be suitable for any other purposes. Accordingly, this report should not be relied upon by any other parties or for any other purpose than that for which it was prepared. Any reliance placed on this report by other users is solely at their own risk. Our limited assurance engagement does not extend to information in respect of earlier periods. Furthermore, we have not expressed an assurance opinion on the Consolidated Sustainability Statement as a whole.

Praha, 26 June 2026



Ing. Ján Bobocký, FCCA
Partner
Deloitte Audit s.r.o.



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