

# ESG REPORT

## 2022



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1.

INTRODUCTION

# MESSAGE FROM CHAIRMAN OF EXECUTIVE COMMITTEE

Dear all,

In an era where businesses become recognized not only for their financial performance but also for their impact on society and the environment, Elevion Group's ESG report represents our commitment to transparency, responsibility, and sustainable growth.

We, at Elevion Group, are providers of end-to-end decarbonization services. We create sustainable, future-proof solutions while delivering long-term economic benefits to our customers. Green energy services represent our second strongest pillar with continuous growth but for us decarbonization is not just about green energy. The less energy that is required, the fewer CO<sub>2</sub> emissions that are produced. Therefore, we also focus heavily on achieving high energy efficiency to support our customers' and Europe's decarbonization efforts. In 2022, we helped our customers to reduce over 326.813 tons of CO<sub>2</sub> emission.

This report summarizes our dedication and responsibility towards not only the environment but also our employees and other stakeholders.

As I believe that people are the main key to our success, the core part of our effort is focused on developing our people and growing our employee base. In 2022 alone more than 500 new employees across different countries in Europe joined our group. We are implementing our initiatives while supporting further diversity that is an integral part of our DNA. Elevion Group consists of over 60 individual companies with unique culture, history and know-how from 12 countries, but we work together as one team to form a strong European group.

This report reflects our journey to integrate sustainability into our core business strategy. Our goals have been chosen to comply with VISION 2030 - Clean Energy of Tomorrow of our parent company CEZ Group that defines strategic objectives for 2030 in line with the EU's decarbonization vision.

Within these pages, you will find an overview of our environmental, social responsibility and governance initiatives.

I would like to express my gratitude to all those who have contributed to the development of this report, including our employees, partners, and stakeholders.

Thank you for your interest in our ESG journey.

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 2022.



JAROSLAV MACEK  
CEO of Elevion Group

## OUR VISION NEW GENERATION OF ENERGY FOR EUROPE

As Europe's leading solution provider for integrated energy services and highly efficient energy systems, we make a significant contribution to the technical and ecological safety and economic success of our costumers.

We are pioneers and and innovators in decarbonisation, the prevention of CO<sub>2</sub> emissions and the protection of natural energy resources.

# ELEVION GROUP PROFILE AND STRUCTURE

<b>Statutory name:</b>	Elevion Group B.V. (EGBV)
<b>Seat:</b>	Herikerberweg 157, 1101CN Amsterdam, The Netherlands
<b>Prague Branch Office:</b>	Duhová 1444/2, Michle, 140 00 Prague 4, Czech Republic
<b>CCI No.</b>	65782267
<b>EUID</b>	NLNHR.65782267
<b>Date of last deed</b>	20. 5. 2020

Elevion Group B.V., a 100% subsidiary of CEZ Holdings B.V., is an energy solutions provider (ESCO, Energy Service Company) for all tasks related to the intelligent use of energy.

With a focus on integrated energy services, Elevion Group provides its customers with solutions that seamlessly combine sustainable CO2 reductions, continuous improvement in energy efficiency, significant savings in energy costs and all areas of technical building equipment and services.

Elevion Group belongs to CEZ Group, as CEZ Holdings B.V. is a 100% subsidiary of CEZ, a. s. (CEZ Group). CEZ Group is one of the ten largest energy companies in Europe. This enables Elevion Group to generate and leverage synergies and benefits for customers and partners across Europe.

Elevion Group ESG strategy is derived from the CEZ Group ESG strategy and is in line with CEZs VISION 2030 – Clean Energy of Tomorrow.

[→ CEZ Group's profile](#)

CEZ Group is a stable energy group, one of the largest economic entities in Czechia and Central Europe, contributing significantly to the development of the region's energy sector.

In addressing the energy crisis in 2022, CEZ Group has proven that it remains a safe and reliable harbour for its customers and has been able to ensure maximum energy supply for Czechia and the neighbouring countries.

In its activities, CEZ Group emphasizes the implementation of global climate goals, decarbonization, and the impact of business activities on the environment in general. It focuses on developing nuclear and renewable energy and innovation in the energy sector to provide reliable and sustainable services to its customers.

The core value is generated from the emission-free production, distribution, and sale of electricity and heat. Other significant activities include commodity trading, natural gas distribution and sales, mining, and, most importantly, the provision of comprehensive energy and advanced technology services. CEZ Group employs nearly 29,000 people and supplies power and modern energy solutions to millions of customers in Czechia, Germany, Poland, and Slovakia. Outside Central Europe, it operates mainly in France, Italy, and the Netherlands.

**117** Locations

**4,099** Employees (Headcount)

**500** MWp of new photovoltaics per year

**2,000** MWp of photovoltaics O & M

**6,000+** Projects

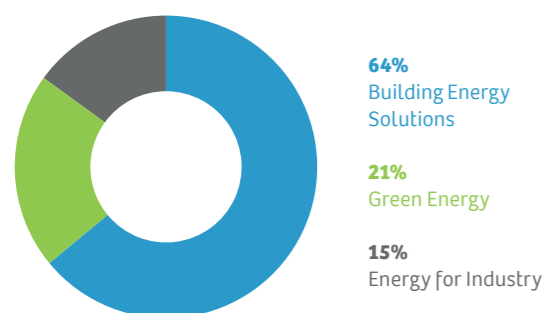
**€899mil.** Total revenue in 2022

**65+** MWp of new photovoltaics per year

# ELEVION GROUP SERVICES

## THE GROUP PROVIDES ITS CUSTOMERS WITH A RANGE OF SOLUTIONS. THE PORTFOLIO CAN BE CLUSTERED INTO THREE PILLARS.

Revenue split in portfolio segments



As a solution provider, the focus of our activities is on the lifecycle assessment of buildings and systems, coupled with the demand for maximum efficiency in the generation and use of energy. The 360° service portfolio within Elevion Group (from design and planning to execution and maintenance, financing and contracting) provides all the "tools" for the individual and customer-specific implementation of these high demands.

### STRUCTURE OF COMPANIES UNDER ELEVION GROUP B.V

The subsidiaries under the umbrella of Elevion Group are successful, regionally rooted and highly specialized companies with decades of experience, whose core competencies span all market segments from Building Energy Solutions, Energy for Industry to Green Energy services.

We are an internationally active group that generates and utilizes synergies and benefits for customers and partners across Europe. The operational foundation of Elevion Group is effectively supported by a lean organizational structure.

Elevion Group B.V. (EGBV), headquartered in Amsterdam, acts as the strategic holding company for Elevion Group.

### BUILDING ENERGY SOLUTIONS

combine design & build, a comprehensive range of services for technical building equipment including HVAC, electrical installations, and solutions for industrial automation, decarbonization with execution and installation and all segments of maintenance and repair.

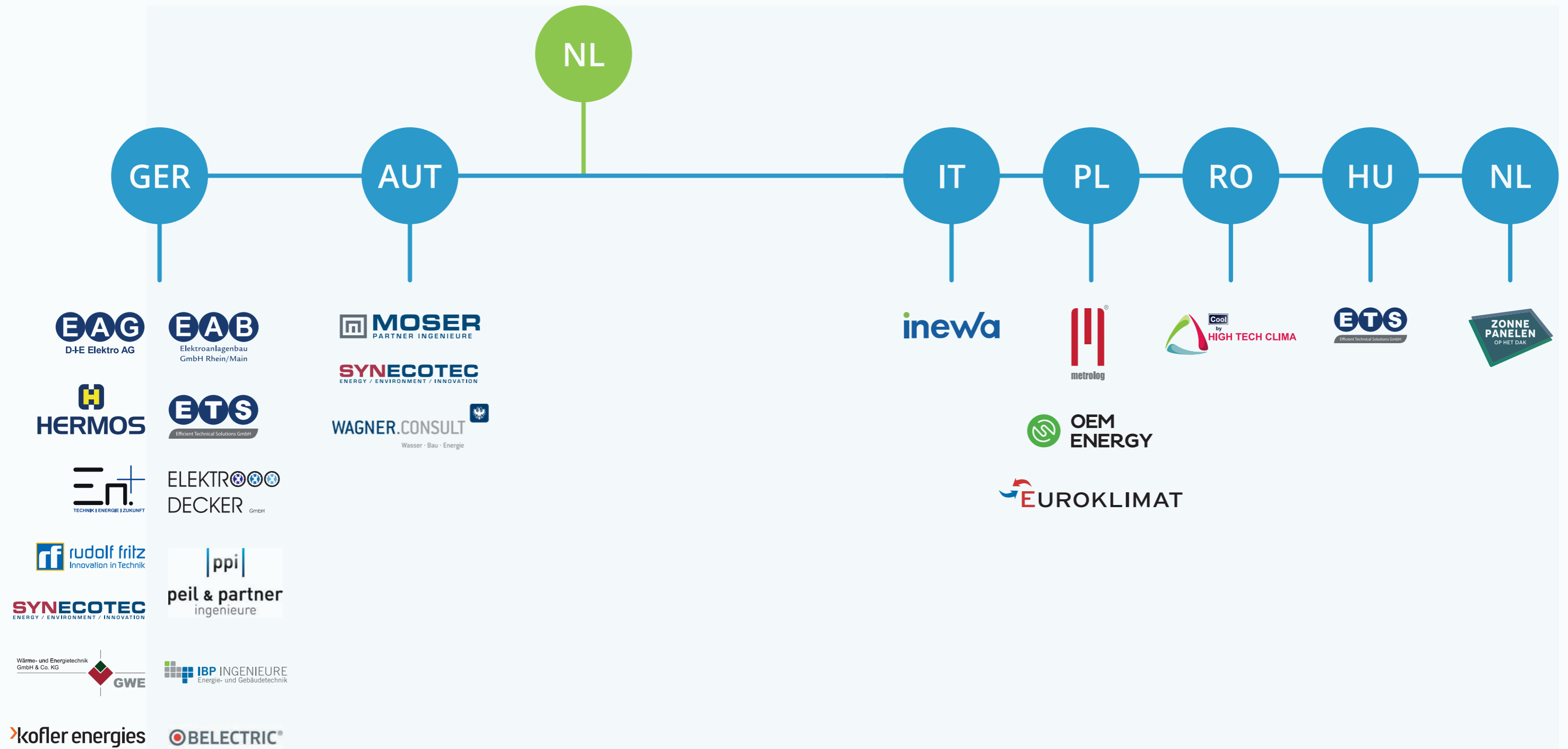


Our **GREEN ENERGY PORTFOLIO** provides services related to the generation of energy from renewable sources, energy management solutions, and other sustainable and tailor-made solutions for decarbonization and energy transition.

### ENERGY FOR INDUSTRY

services provide energy-efficient solutions for industry from planning to realization, such as decarbonization, comprehensive implementation of investments in the field of thermal energy, as well as the construction of water treatment systems to provide energy-saving and ecological, safety and functionality-oriented solutions.





Note:  
The schema does not include all the companies within the group,  
only those operating on the most important markets.



AMSTERDAM  
**levion**  
Group



ZONNE  
PANELEN  
OP HET DAK

ESSEN  
ELEKTRO  
DECKER

**EAB**  
Elektroanlagenbau  
GmbH Rhein/Main  
DIETZENBACH

**EAG**  
D+E Elektro AG  
JENA

**rudolf fritz**  
Innovation in Technik  
RÜSSELSHEIM

**BELECTRIC**  
KOLITZHEIM

**HERMOS**  
MISTELGAU

**levion**  
Group  
PRAGUE

**SYNECOTEC**  
ENERGY · ENVIRONMENT · INNOVATION  
HEIDELBERG

**IBP INGENIEURE**  
Energie- und Gebäudetechnik  
MUNICH

**ETS**  
Energie- und Gebäudetechnik  
MUNICH

**MOSEF**  
PARTNER INGENIEURE  
ABSAM

**SYNECOTEC**  
ENERGY · ENVIRONMENT · INNOVATION  
WAGNER CONSULT  
Wasser · Bau · Energie  
ABSAM

**inewa**  
BOLZANO

CZARNKW

**metrolog**

BERLIN

**kofler energies**

**peil & partner**  
Ingenieure

SUCHY LAS

**EUROKLIMAT**

CHORZW

**OEM ENERGY**

BUDAPEST

**ETS**

BUCHAREST

**High Tech Klima**

# MARKET POSITION AND ECONOMIC PERFORMANCE

## IN 2022, OUR BUSINESS WAS AFFECTED BY THE FOLLOWING DRIVERS:

### GERMANY

In 2022, for the first time, GDP growth exceeded its pre-pandemic level. It increased despite difficult conditions in the global economy, which included the ongoing COVID-19 pandemic, delivery bottlenecks, price increases, and the war in Ukraine

#### Economic situation in the Building Energy Solutions

In 2022, the construction industry in Germany was impacted by the war in Ukraine and characterized by increasing prices for building materials, shortages of building materials, a lack of skilled workers, high inflation, and the ongoing effects of the coronavirus pandemic.

#### Economic situation in the Green Energy

Germany's power production from renewable energy increased in 2022. It accounts for 46% of German power consumption. In 2021, it was 43%.

The power generated by solar power plants in 2022 was particularly remarkable. This was because of a sharp increase in installations as well as very sunny weather. Over the course of the year, the power generated by photovoltaics accounted for approximately 11% of Germany's gross electricity consumption.

The German government also initiated numerous changes to laws and regulations. The plan is that more open spaces will be available for use in the future.

#### Economic situation in the Energy for Industry Solutions

Due to Russia's ongoing war against Ukraine, the move away from natural gas towards decarbonization was one of the most important tasks for the Energy Industry Solutions segment in 2022. The industrial sector looked for complex solutions – combining energy savings together with the environmental impact of the solutions.

### POLAND

The year 2022 was also economically challenging for Poland. The pandemic on the one hand (especially the blockades in China and problems in global logistics), and the consequences of the war in Ukraine on the other, have significantly slowed down the business. In the past year, the Polish economy has struggled with inflation, rising interest rates, and the negative effects of the war in Ukraine.

#### Economic situation in the Building Energy Solutions

Investments in the construction industry were delayed due to the pandemic. This was accompanied by rapidly rising prices for construction services, material, and supply chain issues. Industrial and warehouse construction remains the largest segment of the non-residential sector. This is mainly due to the rapid growth of the e-commerce market. In 2022, new industrial and warehouse buildings were commissioned in Poland (increase by 5.1%), and 575 buildings were extended (increase by 1.2%).

#### Economic situation in the Green Energy Segment

In the photovoltaics segment, a slight decline was observed due to the end of direct state support for individual electricity consumers. On the other hand, heat pump sales were up +35%.

#### Economic situation in the Energy for Industry segment

In 2022, the thermal energy market faced problems resulting from the war in Ukraine, namely the shortage and high price of coal, which is the primary fuel in the Polish power sector, and high gas prices. Most decisions on CHP (Combined heat and power) construction were postponed, while upgrades and renovations to existing district heating infrastructure were kept to the minimum necessary. As a result, we have seen a significant decrease in investment in the district heating sector. On the other hand, the energy transformation of the Polish district heating sector, which is moving towards the construction of distributed hybrid energy sources that combine heat pumps with photovoltaics, heat recovery and gas CHP, has accelerated.

Due to climate changes and the relatively old infrastructure in Poland, the water treatment segment grew dynamically in 2022. The dynamic ratio amounted to nearly 500% which was a result of governmental subsidies from the Polski Ład (The Polish Deal). In 2023, the market value of investments is estimated to be 20% higher than in 2022 and. In the next few years, the investment level will slowly decline due to expiration of governmental grants.

### OTHER MARKETS

**In Italy**, GDP growth was driven by a return to growth in household consumption, partly due to an improved epidemiological situation, and an increase in investments and exports.

In 2022, the Italian government supported the production of biomethane for use in transport, heating, industry and residences, as well as in the service and agricultural sectors.

**In Austria**, as with other countries, the market recovered from the COVID-19 pandemic leading to a strong uptick in services and industrial production, as well as in a significant increase in consumer spending in 2022. Renewables represent over 85% of domestic energy production. The photovoltaics sector specifically showed record growth in 2022

In 2022, the **Romanian construction market** saw some projects postponed and investments decline due to uncertainty. There are multiple causes - high inflation, increased energy costs and the negative impact on people's incomes. All of this has affected the entire supply chain, resulting in reduced purchasing power.

**The Dutch economy** was stable in 2022, although the impact of high inflation is significant, especially on businesses that are heavily dependent on fossil fuels. Sustainability makes companies less vulnerable to these high energy costs. The Netherlands is the European leader in the installation of solar photovoltaic systems. With an installed solar PV (Photovoltaics) capacity of 1,000 Wp per capita, the Netherlands has the highest PV capacity in Europe. In 2022, the Netherlands produced 15% more renewable energy than in 2021, a total of 3.68 GW. Much of the growth in renewable energy comes from solar power.

# ABOUT THE REPORT

Elevion Group is issuing the non-financial information within this 2022 ESG Report with reference to GRI Standards (2021) covering the reporting period of 1 January - 31 December 2022.

As this is the first non-financial report issued by Elevion Group, no restatements were made.

The scope of the reported entities was determined based on the Elevion Group structure as at

31 December 2022. Unless otherwise specified, the scope is the same across all material topics.

To the best of our knowledge, the ESG Report gives an accurate and fair overview of the non-financial data for 2022, sustainable business strategy, and targets set for the future development of Elevion Group.

Entities included in the reporting.

SUBGROUP/CLUSTER	ENTITY
BELECTRIC Group	Belectric France S.A.R.L.
	BELECTRIC GmbH
	Belectric Israel Ltd.
	Belectric Italia S.r.l.
	Belectric Solar Ltd.
Elevion Energy & Engineering Solutions GmbH (formerly CEZ ESCO II GmbH)	Elevion Energy & Engineering Solutions GmbH (formerly CEZ ESCO II GmbH)
	Elevion Co-Investment GmbH & Co. KG*
	GWE Verwaltungs GmbH*
	GWE Wärme- und Energietechnik GmbH
	Hybridkraftwerk Culemeyerstraße Projekt GmbH*
	IBP Ingenieure GmbH & Co. KG
	IBP Verwaltungs GmbH*
	Kofler Energies Energieeffizienz GmbH
	Kofler Energies Ingenieurgesellschaft mbH
	Kofler Energies Systems GmbH*
	NEK Facility Management GmbH*
	Peil und Partner Ingenieure GmbH
	SYNECOTEC Deutschland GmbH
	E-City sp. z o.o.
Elevion GmbH	D-I-E Elektro AG
	EAB Elektroanlagenbau GmbH Rhein/Mein
	Elektro-Decker GmbH
	Elevion Deutschland Holding GmbH*
	Elevion GmbH
	En.plus GmbH
	ETS Efficient Technical Solutions GmbH
	ETS Efficient Technical Solutions Shanghai Co. Ltd.
	ETS Engineering Kft.
	Hermos AG
	HERMOS International GmbH*
	Hermos Schaltanlagen GmbH
	HERMOS SDN. BHD
	Hermos sp. z o.o.

SUBGROUP/CLUSTER	ENTITY
Elevion GmbH	Hermos Systems GmbH
	MWS GmbH
	Rudolf Fritz GmbH
	Hermos Signaltechnik GmbH
	AMPRO Medientechnik GmbH
	Ampro Projektmanagement GmbH
Elevion Group B.V.	Elevion Group B.V.
Elevion Holding Italia Srl	AxE AGRICOLTURA PER L'ENERGIA SOCIETA' AGRICOLA A R.L.
	Budrio GFE 312 Società Agricola S.r.l.
	Elevion Holding Italia Srl
	inewa consulting Srl
	inewa Srl
	SOCIETA' AGRICOLA DEF S.R.L.
	SYNECO PROJECT S.r.l.*
	Società Agricola BTC SRL
Elevion Österreich Holding GmbH	Elevion Österreich Holding GmbH
	Moser & Partner Ingenieurbüro GmbH
	M & P Real GmbH
	Syneco tec GmbH
	Wagner Consult GmbH
Euroklimat sp. z o.o.	Euroklimat sp. z o.o.
High-Tech Clima S.A.	CEZ ESCO Romania S.A.* (entered insolvent liquidation in 2022)
	High-Tech Clima S.A.
Metrolog sp. z o.o.	Metrolog sp. z o.o.
OEM Energy sp. z o.o.	OEM Energy sp. z o.o.
ZOHD Groep B.V.	Energy Shift B.V.*
	ZOHD Groep B.V.
	Zonnepanelen op het Dak B.V.
	Zonnepanelen op het Dak Installaties B.V.



**Note:**

\*The calculation of the carbon footprint excludes these entities as they are immaterial to the group by all means (material emission sources, number of employees, key financial indicators, size of operations and significance of ESG impacts).

The financial information presented in this report was compiled from the Annual report of Elevion Group for 2022.

Non-financial information was collected from internal systems and sources (HR, health and safety, facility management, purchasing, finance, legal and governance, etc.) and from external partners (landlords, suppliers, subcontractors, waste management companies, etc.)

In cases where the data was not available, we included a reasonable estimate. If an estimate represents a material proportion of the reported indicator, it is further explained in the body of the report. Non-financial data cover the full 12-month period of 2022, irrespective of the acquisition date of the entities.

This report was reviewed by Jaroslav Macek CEO of Elevion Group and ESG Office of CEZ Group.

This report has not been verified through external assurance.

We value your feedback, and we are happy to answer questions relating to this report or any possible concerns you may have regarding the sustainability agenda at Elevion Group.

Please contact us at: [esg@eleviongroup.com](mailto:esg@eleviongroup.com)

# MATERIALITY ANALYSIS

## THE MATERIALITY ANALYSIS WAS PERFORMED WITHIN THE FOLLOWING STEPS:

1. Based on the GRI Standards, the UN Sustainable Development Goals (SDGs), SASB and benchmark of selected peers, an initial list of ESG topics relevant to the sector was compiled.
2. We organized a workshop with the participation of management representatives from all functions and areas related to the ESG area to evaluate and prioritize ESG topics. As the simplified approach reflecting double materiality perspectives at a high level was used, the participants decided whether the topics were material from the impact and financial perspective. The decision was subjective, without any quantitative scale, as Elevion Group is going to perform a detailed materiality assessment in the near future.
3. The topics evaluated were then subjected to a detailed one-by-one assessment in which the final groups of topics were defined based on priority.
4. Finally, for all topics, we assessed whether they would be subject to reporting obligations under EU legislation or ESRS cross-cutting standards.

Topic areas:

- Environmental
- Social
- Governance
- Sector-specific

**Basic requirement**  
intended to be disclosed based on requirement of stakeholder(s) or topic governed by law

- Good corporate governance
- Compliance with laws and regulations
- Cyber security and data protection
- Non-discrimination, Human rights
- Equal remuneration for men and women
- Collective bargaining
- Occupational health and safety

**Second-level priority**  
intended to be disclosed as part of non-financial reporting

- Waste management
- Circular economy
- Energy consumption of own facilities
- Biodiversity, Environmental protection
- Sustainable finance
- Managing risks and opportunities due to climate change
- Governance bodies, Statement on sustainability due diligence, Risk management
- Local communities
- Public policy
- Other (non-employee) workers
- Diversity and inclusion
- Stakeholder dialogue

**Top priority**  
intended to be integrated into group strategy

- 
- Sustainable procurement
- 
- Availability of skilled and diverse workforce
- GHG emissions (decarbonisation)
- Green energy
- Innovative solutions

## STAKEHOLDERS

As our stakeholders play an important role in our sustainability development, we plan to engage more with them in the field of ESG. As of 2022, we define the main groups of stakeholders, topics that are important to them, the form and frequency of communication as well as the owner

of the communication on the Elevion Group side. As a next step, we want to perform a detailed stakeholder dialogue in the future to more deeply understand the priorities of our stakeholders and implement them in our strategy.



Stakeholder	Topic	Form of communication	Frequency	Owner
Employees, trade unions	Occupational health and safety	Email	daily	HR
	Employee development and training	Intranet	monthly	Marketing
	Employee benefits & remuneration, Equal remuneration	Employee assessment	annually	
	Employee retention and turnover	Employee survey	annually	
	Human rights, Diversity and inclusion, Non-discrimination	Personal and virtual meetings	weekly	
	Collective bargaining - on the country level as well as on the EU level (EU work council on the CEZ level - 2x year)	Townhall meeting	quarterly	
Customers	Green solutions	Project references	daily	sales
	Energy efficiency and savings	Social media, LinkedIn, email, letter, phone	ad hoc basis depending on customer and subject of the contract	Marketing
	Contractual terms and warranty	Website		
	(Delivery costs, payment conditions, hand-over protocol, deadline, service and maintenance)	Brochure		
Suppliers, subcontractors, JVs	Information about new products & services	Presentations		
	Customer satisfaction survey & references	Personal & virtual meeting		
	Service & product portfolio	Press Releases		
	Project references & experience			
	Quality, health, safety and environment (QHS & E)			
	Sustainability & nature friendliness of services			
	Business terms and conditions	Email, Letters, Personal and virtual meetings, telephone calls, Regular reporting, social media and website, LinkedIn, Expositions, Congresses	Daily basis	Procurement, Business, Development, HR PR, Legal, External communication
Ethical business conduct				
Materials consumption				
Submission of tenders				
'Human rights in supply chain				
Sustainable procurement				

Municipalities, local communities	Transparent communication about projects	Personal meetings (at council meetings)	Weekly - project related	Project development department
	Financial benefits of our green energy for municipalities, clearing up prejudices related to green energy plants (e. g., area consumption, soil sealing)	Presentations including video screening		Marketing
	Biodiversity, Environment protection, Traffic increase, Noise smog, Water resources	Brochures		
	Innovative solutions for clean energy technology	Flyers		
	Socio-economic contribution to local communities and regions (new jobs, taxes)	website		
	Participations in events	social media		
Shareholders (major, minor), banks, financial institutions, investors			letters	
	Financing	Regular reporting and communication with CEZ and banks:	Daily	Financial department
	Strategy, Business model	Emails		
	Performance	Personal and virtual meetings		
	Managing risks and opportunities due to climate change			
	Responses to evaluation questionnaires			
Sister companies and subsidiaries	Sustainability finance			
	Group-cross selling	Group communication:	Weekly	Business development department
	Know-how sharing	Emails		
	Synergies (procurement)	Personal and virtual meetings		
Government Organizations (officials), regulators, policy makers, associations	Submission of tenders	Public Affairs, Public Relations	ad hoc	Legal department
	Compliance with laws and regulations			PR department
	Legislative changes			External communication
	Centralized and decentralized energy infrastructures			
	Lobbying			
	Clearing up prejudices related to green energy plants (e.g., area consumption, soil sealing...)			
Competitors	Regulatory	conferences, fair trades, professional associations	2x year	Business development, commercial department
	Agility and innovation			
	Market developments			

# SUSTAINABLE DEVELOPMENT GOALS

A collection of 17 interlinked global goals called Sustainable Development Goals (SDGs) were set up in 2015 by the United Nations General Assembly to be a "blueprint to achieve a better and more sustainable future for all" by the year 2030.

Elevion Group identified the following SDGs as potential areas where the group can positively contribute to the global efforts.

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

# ESG-RELATED RISKS AND OPPORTUNITIES

As part of the first report, a basic analysis of risks and opportunities was undertaken. It will be further expanded and updated in the following years.

Type of risk	Sub-category	Risk / Opportunity	Name of the risk	Mitigation / Stimulation action	Risk classification	Trend Short term*	Trend Long term**
Transition	Market risk	Risk	Short-term and unforeseeable unavailability of material and increases of raw material prices	Shortages can be resolved by pre-stocking essential parts and materials at least a year ahead. Another option is bundling or potential acquisition of suppliers.	High	Stable	Stable
Transition	Market risk	Risk	Lack of qualified workforce	To secure a qualified workforce, we are ready to support our employees in the upskilling process. We are evaluating the possibility of relocating key employees between the companies.	Medium	Increase	Stable
Transition	Market risk	Risk	Energy price fluctuations	Education and cooperation with our clients is essential. It is important to start thinking in the long run.	Medium	Decrease	Stable
Transition	Technological	Risk	Limited capacity and risk of congestion of electricity distributions and networks	We are ready to support development of local distribution grids that are not connected to the network but that are distributing energy directly to customers. We are also evaluating the possibilities of using the battery storage.	High	Increase	Increase
Transition	Policy regulation	Risk	Unwillingness of local municipalities to integrate renewables into zoning plans	The central and EU governments are focusing on improving the situation. We are planning to deepen cooperation with municipalities.	Medium	Stable	Decrease
Physical	Chronic	Risk	Rising mean temperatures are negatively affecting agriculture (long droughts, floods...)	Increase supply base of agro products & find alternatives	Medium	Increase	Increase
Transition	Technological	Opportunity	Process of energy transition	All our services and products help our clients with their energy transition and decarbonisation.	High	Increase	Stable
Transition	Market risk	Opportunity	Access to competitive financing	Activities of the Elevion Group are, among other things, aiming to help companies with the development of green projects that can grant access to green financing which provides better financial conditions.	High	Increase	Stable
Transition	Technological	Opportunity	New energy sources or energy carriers	Among the others, hydrogen production and distribution options will be further researched.	High	Increase	Increase

Note:  
\* Short term = up to 3 years  
\*\* Long term = more 3 years

# ESG STRATEGY AND ACTION PLAN

The ESG strategy of Elevion group is in line with the ESG strategy of CEZ Group: VISION 2030 – Clean Energy of Tomorrow that defines strategic objectives for 2030 in line with the EU's decarbonization vision. This strategy sets specific ambitions in social responsibility and sustainable development to maximize shareholder value.

ElevionGroup's mission is to provide sustainable, future-proof energy solutions to our customers.

Our vision is to be pioneers and innovators in decarbonization, higher energy efficiency and protection of natural energy resources.

The main ESG strategic priorities of Elevion Group are:

1. Provide decarbonization and higher energy solutions to our customers across EU markets
2. Reduce emission generation and achieve carbon neutrality
3. Grow and develop Elevion Group responsibly following ESG principles

Based on this strategy we have defined the key strategic areas & goals we would like to achieve. This is summarized in the action plan.

Based on the GRI Standards, the UN Sustainable Development Goals (SDGs), SASB and benchmark of selected peers, we have compiled an initial list of ESG topics relevant to the sector. An initial ESG workshop was held with management representatives (9 participants in total). The main objective of the workshop was to identify key sustainability areas for the Elevion Group through an online questionnaire, and to get suggestions for the assessment of priorities.

This initial list has been updated based on multiple internal discussions between management and the ESG team. That resulted in the definition of top-priority topics and subsequently an ESG strategy was developed to address these objectives:

Key strategic area	Areas included	Aim	KPI	Goal
Provide decarbonization and higher energy solutions to our customers across EU markets				
Green energy	Renewables & energy storage	Increase installation of renewables & energy storage: PV, Batteries, Biogas, Hydrogen.	Sum of installed capacity of renewables	2027: Sum of installed capacity of renewables <b>2010 MWp</b> Sum of energy storage: <b>200 MW</b>
			Sum of energy storage	2030: Sum of installed capacity of renewables: <b>3513 MWp</b> Sum of energy storage: <b>500 MW</b>
Innovative solutions	<b>Research &amp; development of new customer solutions and other innovations.</b>	Increase of its annual innovation spend at the minimum of 10% compared to baseline of 2022	<b>All directly attributable costs incurred by the Group</b> (group companies) related to innovation irrespective whether OPEX or CAPEX (including inter alia internal labour or external consultancy costs)	2027: <b>5.5m EUR</b> – corresponding to minimum 10% absolute growth in innovation activities p.a. (compared to baseline of 2022)  2030: <b>7.3m EUR</b> – corresponding to minimum 10% absolute growth in innovation activities p.a. (compared to baseline of 2022)
Reduce generated gas emissions and achieve carbon neutrality				
GHG emissions (decarbonisation)	Greenhouse emissions (scope 1 & 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	2035: -43 % reduction compared to 2022  2040: carbon neutrality
Grow and develop Elevion Group responsibly following ESG principles				
Availability of skilled and diverse workforce	<b>Trainings &amp; people development</b>	To position ourselves as one of the most attractive employers for future talents and current employees.  Fostering an inclusive culture is crucial, emphasizing equal opportunities and support for individuals in their careers.	Frequency of employee training hours  Alignment with employee training in the Code of Conduct	2027: <b>13 hours</b> of training / employee  2030: <b>14 hours</b> of training / employee  95% of employees / year trained in the code of conduct from 2022
Sustainable Procurement	<b>Procurement and supply chain</b>	Implement common procurement rules and compliance with new legislation in Germany  Ensure efficient sourcing and supply chain management	Number of Tier 1 suppliers having signed Supplier Code of Conduct	2027: <b>70%</b>  2030: <b>100%</b>

Note:  
More information about the availability of a skilled and diverse workforce can be found in the chapter "Social" and additional information about Sustainable procurement can be found in the chapter "Sustainable supply chain".



Current state in the strategic areas can be found in the text below. More information about the availability of a skilled and diverse workforce can be found in the chapter “Social” and additional information about Sustainable procurement can be found in the chapter “Sustainable supply chain”.

# GREEN ENERGY

As outlined in our vision, we are pioneers and innovators in decarbonization and in the avoidance of CO2 emissions and the protection of natural energy resources. This means that we aim to not only deliver positive impacts for our clients in terms of reducing emissions, but also to shape the entire industry by bringing cutting-edge technology to life.

Development of smart and sustainable solutions that help our customers in their decarbonization efforts is our fundamental priority. This includes green energy generation and storage technologies such as battery storage, photovoltaics and hydrogen. Our perspective is not limited to the current stage of technology, but we always strive to perceive technologies in a long-term perspective and keep abreast of the latest developments

## BATTERY STORAGE

Battery storage is undergoing dynamic development and its importance is significantly increasing with energy transition. Batteries can be the answer to the instability of renewable energy sources. It can also provide a solution when securing the stability of the transmission grid.

The first battery storage pilot projects have been launched. The development of battery storage along with photovoltaics are underway. Increasing demand can be expected. The use of batteries is an area of major focus within the Elevion Group. In addition to testing standard battery storage systems, new projects have been launched using batteries with insufficient capacity from electric vehicles.

In the near future, we plan to further develop in this area.

## PHOTOVOLTAICS (PVS)

The main focus is on delivering photovoltaics from early development to the final investment decision.

The construction of photovoltaic power plants needs to respond to the loss of suitable sites. One solution is the use of water areas for the construction of floating photovoltaics. There is also ongoing development of solar power plants on rooftops. Pilot projects for agrivoltaics are being established.

In addition, old photovoltaic power plants are being renovated. In this process, non-functioning components are replaced, restored and modern technologies are implemented. The outcome is the increased performance of the power plant.

## HYDROGEN

Thanks to the strategy of having a full range of product offerings and solutions, there is knowledge on how to integrate hydrogen solutions into existing system components to ensure maximum effectiveness (optimisation of design for performance, cost, and manufacturing). A labor force of highly skilled energy technicians already exists that can be up-skilled.

## BIOGAS

Cogeneration technology is currently at its peak reaching maximum process efficiency. Biogas is a clear example of the use of natural resources with the synergy of electricity, heat production and ecological fertiliser replacing artificial fertilisers with a significant impact on the carbon footprint. The aim is to use biogas in the production of low emission energy using organic byproducts and agro commodities.

## EXAMPLE OF GREEN ENERGY PROJECT DELIVERED TO CUSTOMERS

### Floating PV plant project in Lohamei HaGeta'ot, Israel

Floating solar systems are becoming increasingly important as an integral part of the energy transition. For the construction of one of Israel's largest floating PV plants, EDF Renewables chose Belectric Israel. The 19 MWp project was built on a water reservoir for fish farming pools near Lohamei HaGeta'ot, a kibbutz in the north of the country.

Executing the large-scale project on nine different pools held multiple challenges. First of all, several elements such as the fish farm, construction work and electricity came together in the project. Secondly, hurdles had to be overcome in the design phase due to a lack of space for installing the technical equipment. In addition, strict electrical safety standards for fish farms had to be met by finding creative solutions. Last but not least, the construction process proved challenging as well. Work on the nine pools happened in parallel, the water level was very shallow and, of course, fishing activities were allowed to proceed in the meantime.

Belectric Israel allocated resources to meet the unique challenges of this large-scale floating project. Each of the more than 47,700 PV modules was individually mounted on a floating platform and connected to a rapid shutdown device to increase electrical safety while operating the fishing ponds. The system is connected to the mainland via floating marine-grade power lines. The floating platform itself is held in place by an anchoring and mooring system especially designed by Belectric Israel. By widening the banks of the ponds, the team succeeded in finding another creative engineering solution. Overall, EDF was involved in every decision during the design and execution. This tight-knit cooperation was key to the successful delivery of the project.

## INNOVATIVE SOLUTIONS

The Elevion Group aims to increase its annual innovation spending at a minimum of 10% compared to the baseline of 2022. Below are the planned activities of the Group in the three innovation categories.

### (i) Research and development

The Elevion Group will further invest in the development of in-house software solutions/modifications leading to increased energy efficiencies for the customers.

### (ii) New customer solutions

Projected new customer initiatives will include pilot projects in floating and agri PV in Europe, as well as the rollout of battery storage systems or hydrogen solutions. The Elevion Group also currently aims at developing a B2B software platform for rooftop photovoltaics in Germany which shall focus on creating integrated IT infrastructure enabling business scalability and creating tailor-made customer solutions. The Group also intends to further invest in acquisitions of ESCO companies with a high degree of innovation or creating joint ventures.

### (iii) Other innovation

The Group is also focused on creating increased efficiencies and synergies in internal business processes which will be aided by the rollout of uniform and tailor-made ERP and CRM solutions, as well as group initiatives in data visualization, treasury management systems, or automation in ESG reporting.



2.

ENVIRONMENT

At Elevion Group, we understand how important climate action is to preserving decent living conditions for future generations. We are determined to preserve the world we live in, protect the environment, and support decarbonization in Europe by implementing projects to reduce the impact of the whole life cycle of buildings and in maximizing efficiency in the generation of energy from renewable sources. Besides that, our focus is also internal with the aim to progressively reduce the environmental impact of our own operations.

### ENVIRONMENTAL MANAGEMENT SYSTEM, ENVIRONMENTAL COMPLIANCE

We at Elevion Group require all our companies to implement all of the specific standards necessary in order to respect all normative and regulative requirements to operate on the European and local markets. All projects developed and realized by our subsidiaries undergo an approval process in which compliance with legal standards is verified, including environmental requirements when applicable. In 2022, there were no breaches of obligations arising from legislation regulating obligations in environmental protection.

Companies within the group differ in the industry sectors and therefore require various policies and standards based on specific legislation and market requirements. As of now, Metrolog, a subsidiary providing installation of energy efficiency components, has implemented the ISO 14001 certification system, whereas ETS and EGBV implemented a certified Energy management system (ISO 50001). However, our ambition is to expand these certifications to more companies in order to ensure their environmentally-responsible operation but also to improve their market position.

### ENVIRONMENTAL TRAINING OF EMPLOYEES

In 2022, we organized an initial workshop for a selected group of companies that collectively represent around 90% of the employees. The workshop was held in Munich and organized by the management of Elevion Group, covering such topics as science-based information on the causes and effects of climate change and possible solutions, European decarbonization targets, ESG standards, and the European Taxonomy. Workshop participants shared good practices and developed proposals to reduce the carbon footprint of Elevion Group's companies.

This kick-off workshop was conceived as a first step in the definition, growth, and consolidation ESG governance structure and group ESG team that will interact with the management of particular companies and carry out actions consistent with Elevion Group's vision and strategy and in compliance with strategies and requirements of market positioning and competitiveness.

All together, 20 people participated in the kick-off workshop (online or in person) from more than 15 companies.

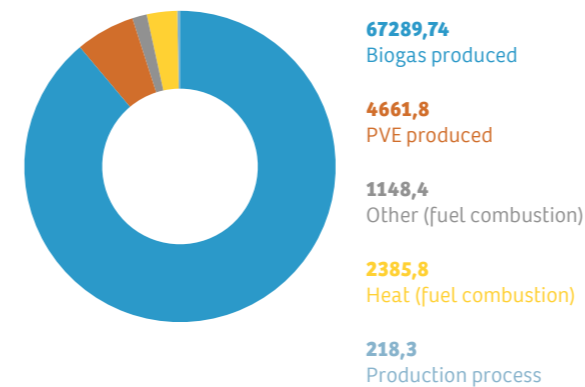
# ENERGY

The total energy consumed by Elevion Group in 2022 was 24,868.44 GJ. Elevion Group is also an energy producer. During the reporting period, 75,704.04 GJ was produced within the company.

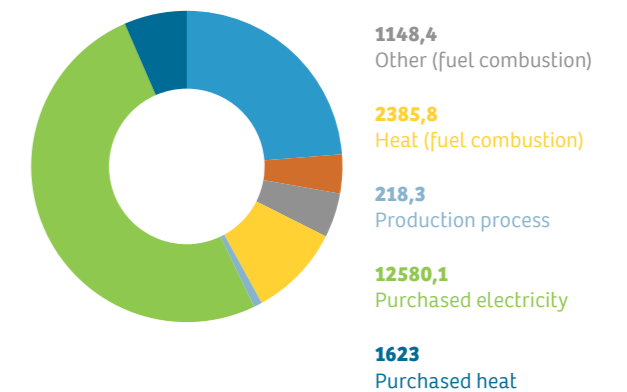
Part of this production was used for own consumption, the rest was sold to the end customers - 65,038.70 GJ.

### ENERGY CONSUMPTION BY TYPE (GJ)

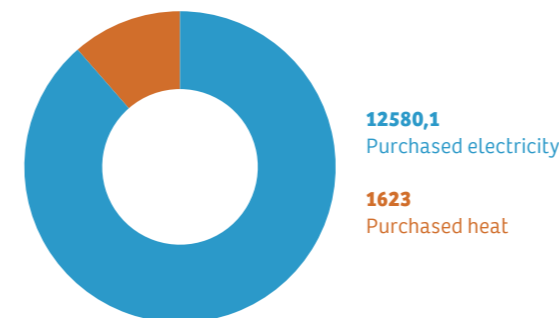
Energy production



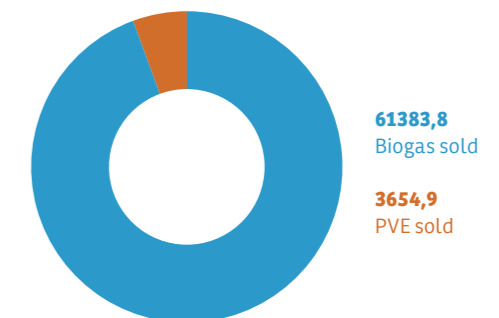
Energy consumption



Purchased energy



Sold energy



Note: Charts represent energy consumed by Elevion Group (only sources owned or controlled by Elevion Group), as well as energy produced and sold to the customers. The fuel combustion includes only stationary combustion and purchased electricity does not include the electricity consumption by electric vehicles.

### ENERGY MANAGEMENT AND SAVINGS, EFFICIENCY MEASURES

Elevion Group encourages the implementation of energy efficiency measures in its buildings wherever possible. En. Plus and Hermos

Schaltanlagen have already defined quantitative targets for energy efficiency.



Examples of energy-saving measures implemented among our companies:

- Policy for purchasing energy-efficient electronic devices (Energy Star, Energy Label);
- Measures to limit the energy consumed by electronic devices when they are switched off or in “standby mode”;
- Characterization and monitoring of energy consumption;
- Utilization of certified green electricity, calculation of the percentage of renewable sources;
- Targets to reduce/efficient energy consumption;
- Maximization of use of daylight;
- Installation/replacement of efficient lighting systems and technologies such as LED technologies;
- Use of lighting management systems such as presence detectors to optimize utilisation;
- Purchasing more efficient machinery;
- Installation of efficient heating systems (condensing boiler).

## ENERGY INTENSITY OVERVIEW

2022		UNIT
Energy intensity by revenue generated	96.03	GJ/1 mil. EUR generated revenue
Energy intensity by number of employees	21.93	GJ/Employee

Note: Types of energy included in the intensity ratio: Fuel (stationary combustion), purchased electricity and purchased heat.

## UTILIZATION OF RENEWABLE ENERGY

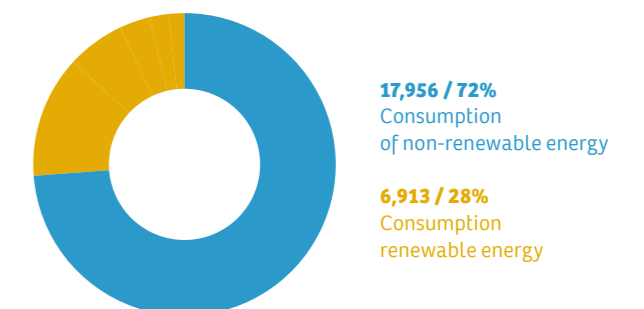
Despite the fact that there is currently no group-wide policy regarding the usage of renewable energy, the following companies are covering 100 % of their consumption with green electricity meaning they are running PV or biogas plant on the building or buying certified green energy:

- Moser & Partner Ingenieurbüro
- Syneco tec
- Wagner Consult
- inewa
- inewa consulting
- Elevion Holding Italia

The following companies have at least some of their consumption covered by green energy:

- IBP Ingenieure & Co. KG
- D-I-E Elektro
- Hermos
- Rudolf Fritz

Total energy consumption by source (GJ)





# BUSINESS TRAVEL AND ELECTROMOBILITY

We are working on a new car policy that would favor low-emission vehicles. Elevation Group is also promoting carpooling and car-sharing solutions. We are encouraging the use of bicycles and public transport.

At the moment, the following companies are running Evs:

- BELECTRIC GmbH
- Belectric Solar
- IBP Ingenieure & Co. KG
- Peil und Partner Ingenieure
- Rudolf Fritz
- En.plus
- Hermos
- D-I-E Elektro
- EAB Elektroanlagenbau Rhein/Mein
- Elevation Group B.V.
- Moser & Partner Ingenieurbüro
- Syneco tec
- Wagner Consult
- ZOHD Groep

At the moment, the following companies are running Plug-in hybrids:

- BELECTRIC GmbH
- Belectric Israel
- Belectric Italia
- Belectric Solar
- Kofler Energies Energieeffizienz
- Kofler Energies Ingenieurgesellschaft
- Rudolf Fritz
- En.plus
- Hermos
- Hermos Schaltanlagen
- Hermos Systems
- D-I-E Elektro
- EAB Elektroanlagenbau Rhein/Mein
- Moser & Partner Ingenieurbüro
- Syneco tec
- Elevation Group B.V.

# CARBON FOOTPRINT

In our efforts to help clients reduce emissions, we are unable to avoid producing emissions ourselves. We have performed a complete calculation of Scope 1 and 2 emissions. Vehicle combustion is a major contributor to our emissions in Scope 1. In the case of Scope 2, the main source of emissions is purchased electricity representing more than 90 % emissions.

Calculation of Scope 3 emissions is the most challenging one due to limited access to data within the value chain. Because of that, Scope 3 emissions were not included in the calculation. However in the near future we plan to broaden the calculation and include Scope 3 emissions.

A detailed overview of the carbon footprint information and data can be found in the Greenhouse Gas Emissions Inventory Report of Elevion Group that is available at the Elevion Group webpage.

## DEFINITIONS:

### Scope 1: Direct GHG emissions

Direct GHG emissions occur from sources that are owned or controlled by the company, for example, emissions from combustion in owned or controlled

boilers, furnaces, vehicles, etc.; emissions from chemical production in owned or controlled process equipment.

### Scope 2: Electricity indirect GHG emissions

Scope 2 accounts for GHG emissions from the generation of purchased electricity consumed by the company. Purchased electricity is defined as electricity that is purchased or otherwise brought into the organizational boundary of the company. Scope 2 emissions physically occur at the facility where electricity is generated.

#### Location based method:

A location-based method reflects the average emissions intensity of grids on which energy consumption occurs (using mostly grid-average emission factor data).

#### Market based method:

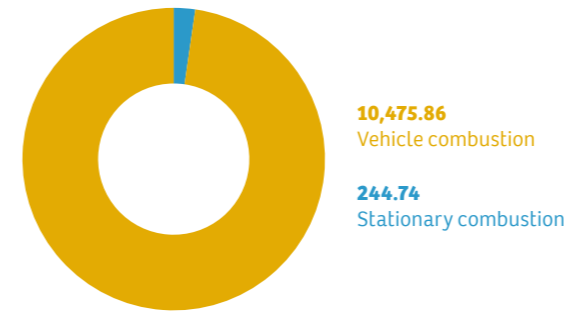
A market-based method reflects emissions from electricity that companies have purposefully chosen (or their lack of choice). It derives emission factors from contractual instruments, which include any type of contract between two parties for the sale and purchase of energy bundled with attributes about the energy generation, or for unbundled attribute claims.

## EMISSION INTENSITY OVERVIEW

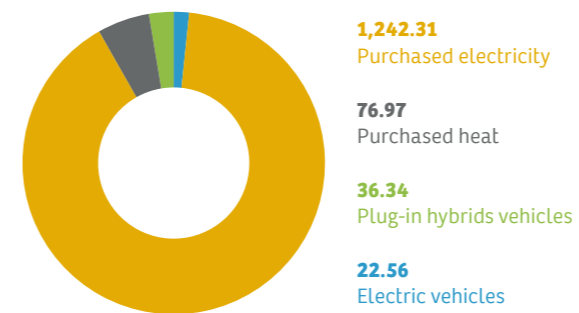
Emission intensity	tCO2e/1 mil. EUR generated revenue - Location based	tCO2e/1 mil. EUR generated revenue - Market based
Scope 1	11.842	11.842
Scope 2	1.520	2.537
<b>Total emission intensity</b>	<b>12.922</b>	<b>13.908</b>

Emission intensity	tCO2e/Employee - Location based	tCO2e/Employee - Market based
Scope 1	2.644	2.644
Scope 2	0.355	0.593
<b>Total emission intensity</b>	<b>2.999</b>	<b>5.654</b>

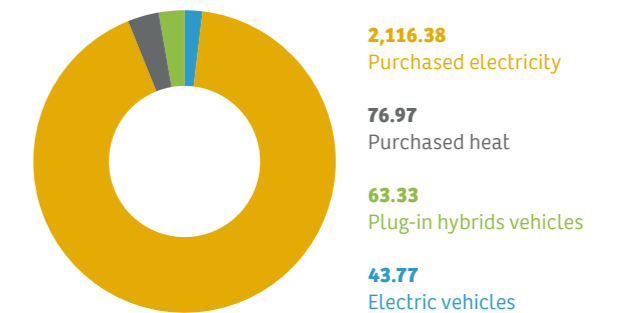
Scope 1 emissions (tCO2e)



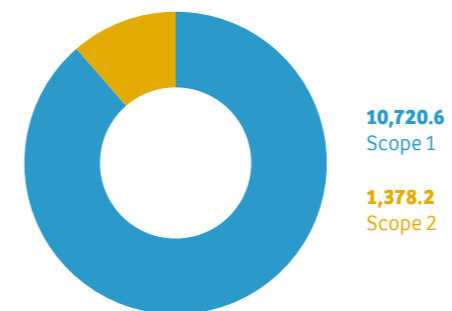
Scope 2 emissions (tCO2e) - location based



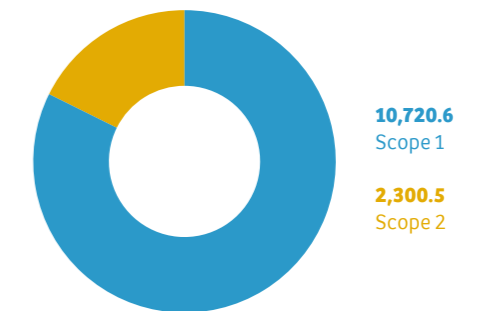
Scope 2 emissions (tCO2e) - market based



Scope 1 & 2 emissions (tCO2e) - location based



Scope 1 & 2 emissions (tCO2e) - market based



# DECARBONIZATION STRATEGY

## DECARBONIZATION - SCOPE 1 AND 2

	2022	2035	2040
	tCO2e	tCO2e	tCO2e
Scope 1	100%	37,9%	0%
Scope 2	100%	144,82%	0%
<b>Total</b>	<b>100%</b>	<b>56,81%</b>	<b>0%</b>

Note:  
The increase of emissions in 2035 is caused by the transition to EVs, with a decrease in Scope 1 emissions (passenger vehicles). We assume that delivery vehicle emissions as well as electricity and heat consumption will remain the same until 2040, when all renewable energy and the transition of combustion cars to EVs will be 100%. In 2035, total emissions are at 56.81% compared to the baseline emissions in 2022.

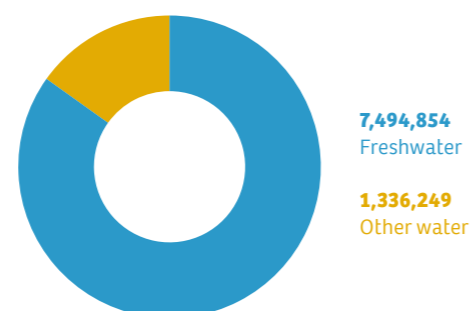
# WATER

As most of the companies utilize rented premises; water management is, in the majority of the cases, under the control of the landlord and they are only able to estimate their water consumption in their office operations. Where possible, companies have implemented the use of taps with air mixers or photocells to reduce water consumption.

Water-intensive companies comply with European and country regulations, and they also monitor the quality of water consumed for crops based on the requirement of competent public authority.

Some of the facilities of Elevion Group companies are located in areas experiencing water stress. In particular, Elevion Holding Italia, BELECTRIC are both running their businesses in Italy and, in the case of BELECTRIC, also in Israel, France and some vulnerable parts of Germany. Those are the areas with extremely high risk of water stress. Agricultural companies in Italy are considered as operations under high water stress. Environmental and groundwater impact analyses are carried out at the authorization stage by the public authority.

Water withdrawal by type (litres)



Note:  
The graph shows water withdrawal of third-party water in litres.

# WASTE MANAGEMENT AND CIRCULAR ECONOMY

## WASTE MANAGEMENT

We have not yet defined a group-wide policy to reduce the amount of waste produced in our facilities and workplaces. However, some companies have independently defined targets for the reduction of waste produced.

It is common practice to sort waste in offices. Almost all of our companies have implemented solutions to sort the waste produced in the offices and workplaces, according to the different standards introduced at the local level by public authorities. Our companies have implemented some measures to reduce waste, starting from the use of reusable dishware and refillable bottles to separate waste collection and reduce the use of paper.

and implementing tracking measures along the disposal chain. Most of these companies have internal guidelines that help employees to classify and manage hazardous waste. There are procedures that prevent hazardous waste from coming into contact with non-hazardous waste. Employees undergo training on a regular basis. Once a year, Metrolog and EAB Elektroanlagenbau (EAB) undergo second or third-party audits of the management of hazardous and municipal waste.

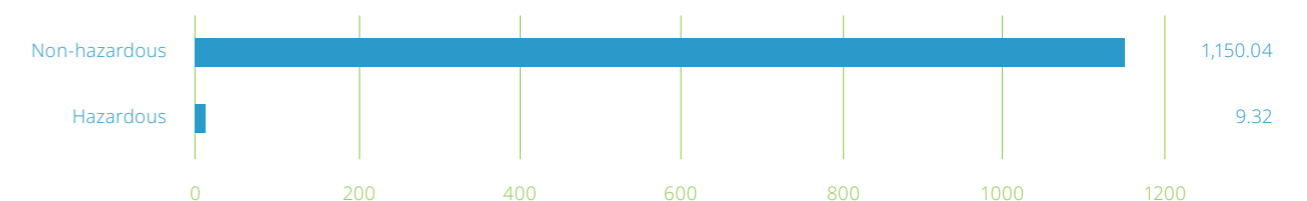
Data on waste production and related emissions are calculated from data collected from both owned and rented buildings. Estimations where the exact amount of waste produced could not be traced was calculated using the ratio of employees to the average value of waste production in the Elevion Group.

## HAZARDOUS WASTE MANAGEMENT

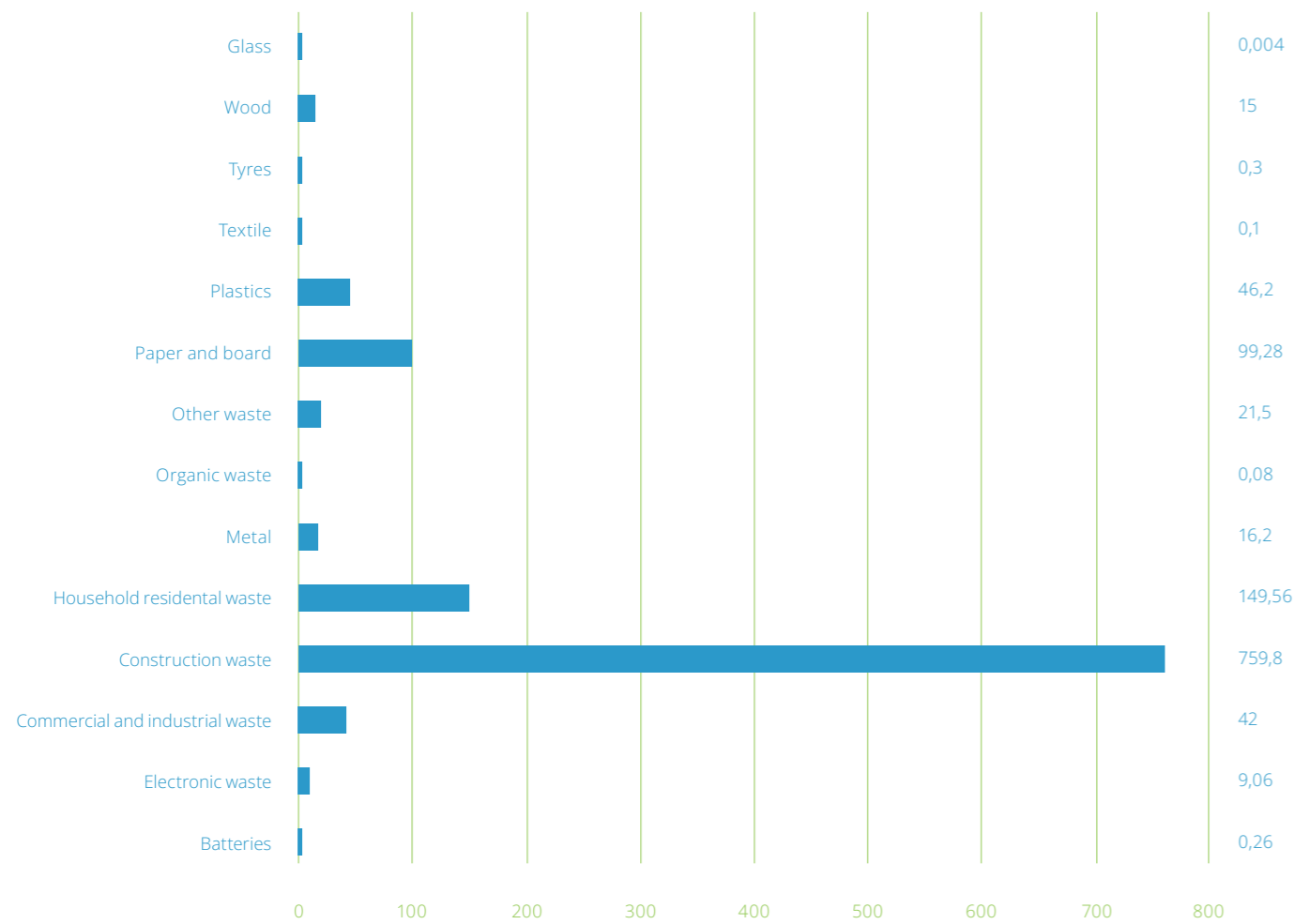
All companies that produce hazardous waste comply with current waste disposal legislation, by identifying and reporting the types of hazardous waste generated by their activities,

In 2022, the total waste generated by the Elevion Group was 1,159.37 tonnes, of which 9.32 tonnes were hazardous and 1,150.04 tonnes were non-hazardous.

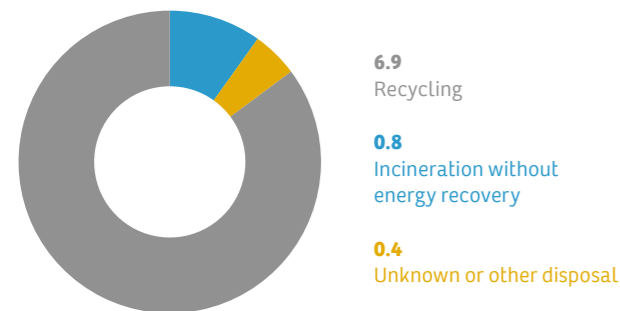
## WASTE GENERATED (TONNES)



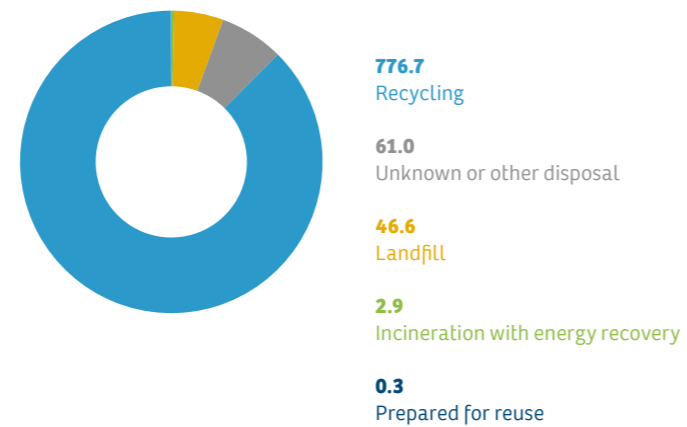
## WASTE GENERATED BY TYPE (TONNES)



Hazardous waste -  
Category of disposal (tonnes)



Non-hazardous waste -  
Category of disposal (tonnes)



## CIRCULAR ECONOMY PRINCIPLES

Good practices can be found in companies such as Budrio GFE 312 Società Agricola, AxE AGRICOLTURA PER L'ENERGIA SOCIETA' AGRICOLA, SOCIETA' AGRICOLA DEF.

Belectric Italia or Società Agricola BTC 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.

# BIODIVERSITY AND ENVIRONMENTAL PROTECTION

## ENVIRONMENTAL PROTECTION DURING CONSTRUCTION

We require that all our companies comply with the legal requirements for environmental protection in all projects that may have a significant impact on the environment and biodiversity. Compliance with environmental regulations is also ensured by the mandatory screening carried out during the authorization of projects by the public authority.

BELECTRIC has implemented a partial screening of ecosystems and the state of biodiversity in and around its operations. It has developed an action plan that helps to offset the negative effects on biodiversity potentially resulting from its activities (biodiversity offsetting).

## ENVIRONMENTAL INCIDENTS PREVENTION AND MITIGATION

By complying with and enforcing applicable legal standards, we indirectly prevent the occurrence of environmental accidents within the scope of their operations. No environmental incidents have been reported in 2022.





3.

SOCIAL

We strive to have a positive impact on the world, which means having a positive impact on the people around us. We are trying to achieve that by supporting our employees, communities, and by delivering products that can make our client operations greener and thus our lives more sustainable. Because, ultimately, it is all about people.

talent development, and is able to identify and secure external talents. One of the tasks of the HR department is, within the framework of determining the Elevion Group HR strategy for the future, to transfer good practices from abroad.

Within the CEZ Group, the Board of Directors meets for a round table where the staffing of key positions within the subsidiaries is discussed. The aim is to look for synergies in terms of staffing the positions with suitable employees, transferring and growth of employees. The same round table is also being held within the Elevion Group.

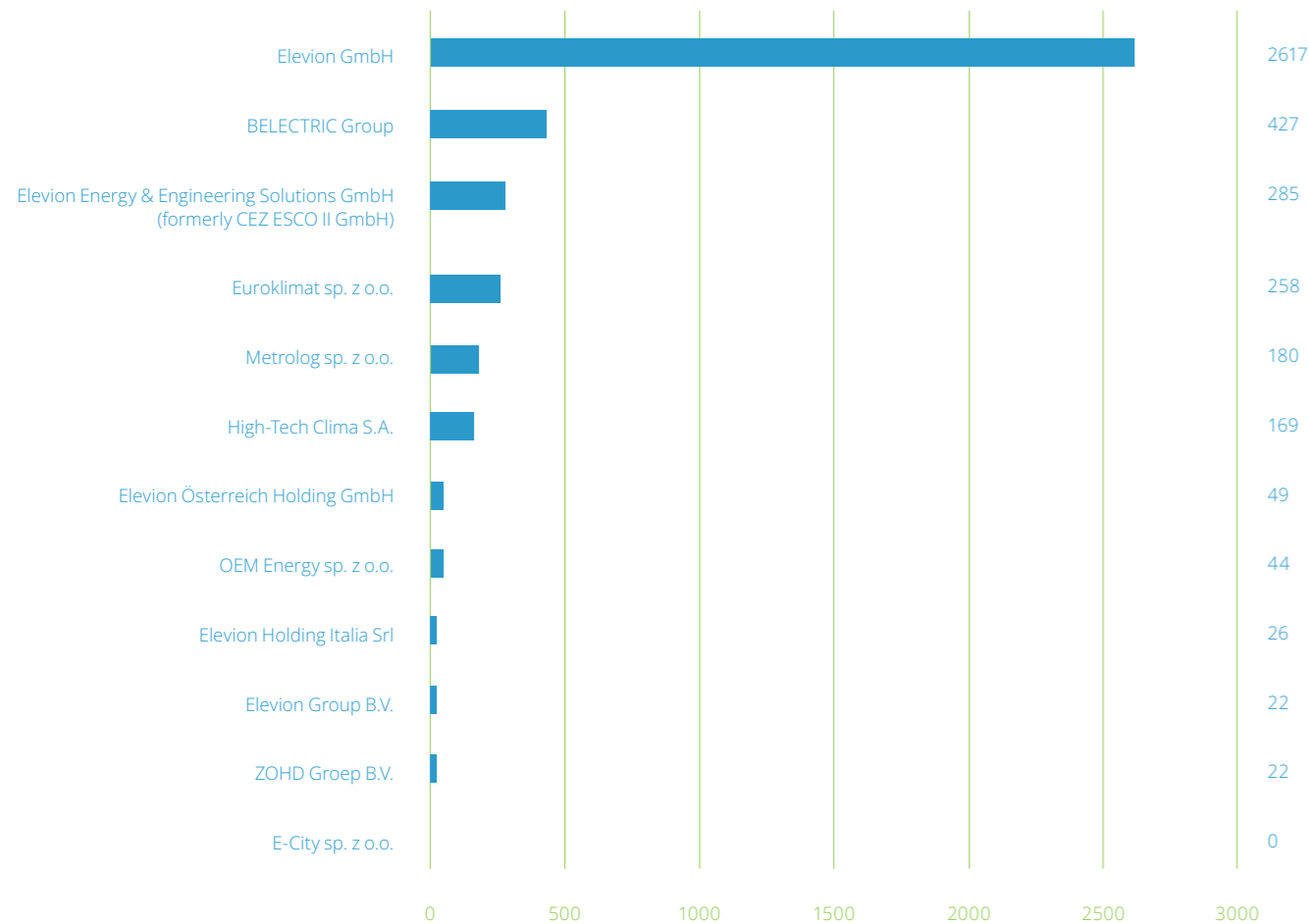
**Key Workforce Statistics:**

The total number of Elevion Group employees is 4,099. Reporting method is headcount as of 31 December 2022 and the number does not include interns. Detailed overview can be found in the tables and charts below.

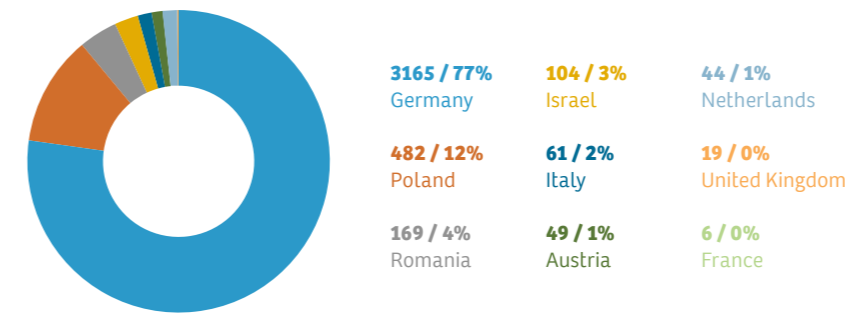
**EMPLOYEE CARE**

Elevion's Human Resources strategy is based on the strategy of CEZ Group. The strategy aims to support the overall strategy of our companies by coming up with an appropriate mix of tools and methods. We are trying to achieve that by fostering people's talents, meeting their aspirations and supporting company culture. We ensure an inclusive environment that aims to promote employee engagement. The primary objective is to come up with a strategy that ensures a suitable working environment,

**ELEVION GROUP - NUMBER OF EMPLOYEES BY COMPANY**



**Elevion Group- Number and percentage of employees by region**

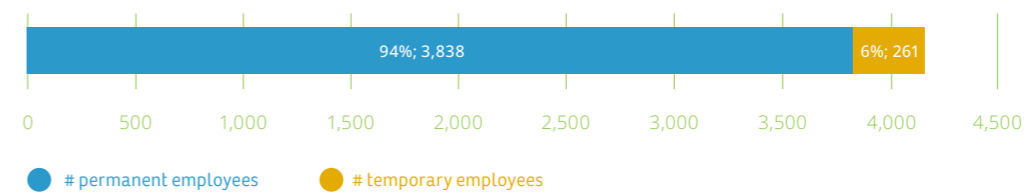


**ELEVION GROUP - NUMBER EMPLOYEES BY EMPLOYEE CATEGORY AND GENDER**

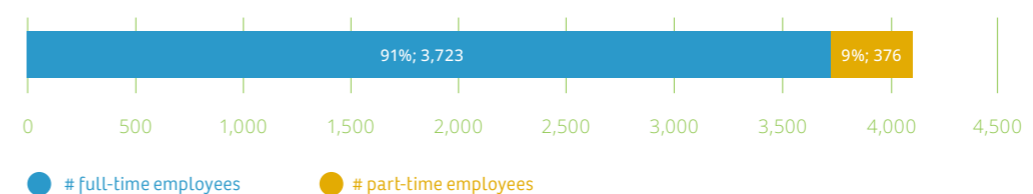
2022

Gender	Total # of employees	# permanent employees	# temporary employees	# full-time employees	# part-time employees
Male	3,318	3,112	206	3,162	156
Female	781	726	55	561	220
<b>Total</b>	<b>4,099</b>	<b>3,838</b>	<b>261</b>	<b>3,723</b>	<b>376</b>

**ELEVION GROUP - NUMBER AND PERCENTAGE OF PERMANENT AND TEMPORARY EMPLOYEES**



**ELEVION GROUP - NUMBER AND PERCENTAGE OF FULL-TIME AND PART-TIME EMPLOYEES**

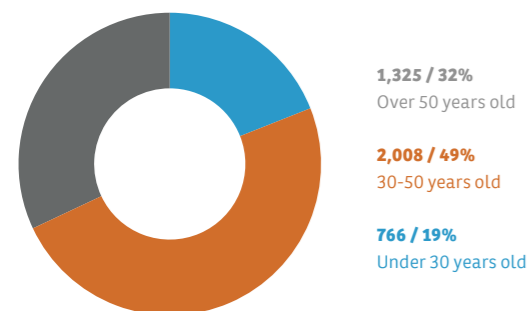


Elevion Group - number of employees  
by employee category and region of operation

2022

Region	Total # of employees	# permanent employees	# temporary employees	# full-time employees	# part-time employees
Austria	49	49	0	38	11
Germany	3,165	2,996	169	2,828	337
France	6	6	0	5	1
Israel	104	102	2	104	0
Italy	61	57	4	56	5
Netherlands	44	29	15	32	12
Poland	482	411	71	477	5
Romania	169	169	0	166	3
United Kingdom	19	19	0	17	2
Totals	<b>4,099</b>	<b>3,838</b>	<b>261</b>	<b>3,723</b>	<b>376</b>

Elevion Group - Number and percentage of employees by age group



# RECRUITMENT & TURNOVER

## ELEVION GROUP - RATE OF NEW HIRES AND TURNOVER



## RECRUITMENT

People are an essential part of our business. We are facing a continuing lack of qualified workforce. This represents a serious problem at some of our locations. Therefore, recruitment is one of the most important internal processes we perform. To address this challenge, we use various tools such as social media especially LinkedIn, head-hunters, and others.

## Apprenticeship and collaboration with schools

A significant part of our recruitment strategy is based on cooperation and partnerships. Thanks to our ongoing collaborations with universities and schools and a wide range of apprenticeship possibilities, especially in the case of our German companies, we are able to attract talents and future experts in the industry.

Examples of the recruitment strategies within the group:

- BELECTRIC GmbH is running its Trainee program, which is helping to get the right talents onboard, assisting them to grow their optimal capabilities keeping organizational objectives in mind.
- Besides the common recruitment tools, Euroklimat implemented a talent initiative entitled "Employee Referral Program". This program allows other employees to recommend potential candidates. In case the employment contract is successfully closed, there is a six-month period after which the employee who recommended the candidate receives the reward.
- Subsidiaries within Elevion Deutschland Holding are focusing on the development of programs to identify talents and initiatives to improve diversity. There is an ongoing process on the introduction of a nationwide succession planning system and the development of high potentials and successor candidates.



2022

Age group	Total number of employees	Number of new hires	Rate of new hires
18-29 years	766	163	21%
30-49 years	2,008	291	14%
50 years and over	1,325	150	11%
<b>Total</b>	<b>4,099</b>	<b>604</b>	<b>15%</b>

2022

Gender	Total number of employees	Number of new hires	Rate of new hires
Male	3,318	486	15%
Female	781	118	15%
<b>Total</b>	<b>4,099</b>	<b>604</b>	<b>15%</b>

2022

Region	Total number of employees	Number of new hires	Rate of new hires
Austria	49	15	31%
Germany	3,165	364	12%
France	6	0	0%
Israel	104	14	13%
Italy	61	18	30%
Netherlands	44	13	30%
Poland	482	96	20%
Romania	169	79	47%
United Kingdom	19	5	26%
<b>Totals</b>	<b>4,099</b>	<b>604</b>	<b>15%</b>

## TURNOVER

The end of the COVID-19 pandemic caused some changes in employee behaviour that many companies continue to deal with even today. A typical example is the boom of working from home. However, there are other, at first glance less obvious phenomena, which influence the HR strategies of organizations. Studies show that COVID-19 started a wave of job dissatisfaction and, as a consequence, a potential wave of employee departures. Due to the specific focus of our business, the number of specialists is limited. It is therefore necessary to respond to the changing needs of our employees by addressing them.

2022

Region	Total number of employees	Number of new hires	Rate of new hires
Austria	49	6	12%
Germany	3,165	346	11%
France	6	0	0%
Israel	104	2	2%
Italy	61	11	18%
Netherlands	44	2	5%
Poland	482	71	15%
Romania	169	38	22%
United Kingdom	19	2	11%
<b>Totals</b>	<b>4,099</b>	<b>604</b>	<b>15%</b>

2022

Gender	Total number of employees	Number of new hires	Rate of new hires
Male	3,318	392	12%
Female	781	86	11%
<b>Total</b>	<b>4,099</b>	<b>478</b>	<b>12%</b>

2022

Age group	Total number of employees	Number of new hires	Rate of new hires
18-29 years	766	123	16%
30-49 years	2,008	219	11%
50 years and over	1,325	136	10%
<b>Total</b>	<b>4,099</b>	<b>478</b>	<b>12%</b>

Note:  
High turnover rate in Italy is caused by restructurization.  
In case of Romania it is a result of the nature of the work, where higher fluctuation is deemed as market standard.

# EMPLOYEE RETENTION

## REMUNERATION POLICIES

As there is currently no Group-level remuneration policy, the approach to remuneration differs from company to company, but with the common principle of transparent and non-discriminatory remuneration. According to the common practice within the group, total remuneration is divided into a fixed remuneration component and a variable remuneration component. The proportions of these two components vary from company to company. Fixed remuneration includes a monthly bonus, benefits and retirement benefits. Fixed remuneration includes a monthly bonus, benefits and retirement benefits. The variable remuneration component includes an annual bonus and a multi-year bonus. However, not all employees are entitled to a multi-year bonus. The variable components are dependent on achieving short-term and long-term targets (KPIs), which are regularly set by internal documents.

Remuneration principles are established by internal regulations - the Remuneration Methodology and the Collective Agreement. The remuneration levels are determined based on these documents. The Remuneration Policy ensures a transparent and non-discriminatory approach to setting remuneration.

## EMPLOYEE BENEFITS

- Besides the benefits such as social retirement or health care contributions that are mandatory in some countries, BELECTRIC GmbH provides many other benefits. A wide range of trainings and courses are offered. The emphasis is on employee development. Free coffee, fresh fruit and EV chargers are a matter of course.
- BELECTRIC GmbH also offers an ongoing program in cooperation with Deutsche Dienstrad which supports alternative ways of commuting called Job-Bike-Leasing, making it easier for employees to obtain new bikes. Thanks to this program, employees can get a new bike with a significant discount - up to 40 % of the initial price. The choice of bike is up to them.
- ZOHD Group provides its employees with the possibility of buying photovoltaics. Thanks to that they can reach at least partial energy self-sufficiency. It also helps significantly with their individual sustainability attempts.
- In general, in the field of benefits, there is an ongoing focus on meeting and reacting to the specific needs of our employees.

As mentioned above, in some countries the contribution to retirement plans is a legislative obligation, but this is not the case in all countries. In the case of the countries where the contribution is optional some of the companies have decided to contribute voluntarily in various amounts.

## EMPLOYEE SATISFACTION

A questionnaire survey to determine employee job satisfaction is gradually being implemented across the entire group. Surveys are already underway in some companies, and the results are generally positive.

# EDUCATION & TRAINING

To keep up with the dynamic and demanding energy industry, we must be 100 % certain that our employees are well prepared to face new challenges.

In the field of employee development and training, our goal is to combine the personal aspirations of every individual with the company's targets.

Total number of employees	Number of training hours	Total training and development expenditures (EUR)	Average training hours per employee	Average training and development expenditures (EUR) per person
4,099	47,257	1,027,723.00	12	251.00

All legally obligated training sessions are conducted across the whole group. In addition to that, individual companies have their own training and educational programs:

- BELECTRIC Group is running its Belectric Academy that is accessible to every employee. Specific training offers are prepared for different employee groups such as apprenticeship, trainees, potentials, and managers. There are also course possibilities outside of BELECTRIC Group to obtain a higher education for technicians or master's degrees, etc. The plan for the future is to expand Belectric Academy, work on new concepts with new trainers, and implement software for training currently used in the Elevion Group.
- In order to support employee personal and professional development, every employee within Elevion GmbH is entitled to training and further education based on the goals mutually agreed with their superiors as part of employee development talks. In addition, many of the companies invest in the development of their junior managers

and have set up corresponding programs for this purpose. Elevion GmbH is currently planning a pilot for a high-potential development program that goes hand in hand with project management and organizational development in order to develop the high-potential talents and optimize the integration of these talents into the organization. The pilot will take place in 2023 in the area of Elevion Energy & Engineering Solutions (EES).

- ZOHD Groep allows its employees to undergo an external program for PV plants. Employees can request individual training according to their needs.
- Metrolog offers specific training courses, e.g., product training in the heating sector, sales techniques, public procurement law, or specific training for technical departments.

It is common practice within the whole Group that the participant in each training course fills in a training evaluation sheet, where it is assessed whether the training has met their expectations, how it was conducted, the materials, the usefulness of the knowledge and skills.



# OTHER (NON-EMPLOYEE) WORKERS

Non-employee workers means predominantly subcontractor workers and other external workers. The relationships with these colleagues are aligned with the local legislative requirements.

Currently, the biggest problem is availability of data. We are working on improving non-employee evidence.

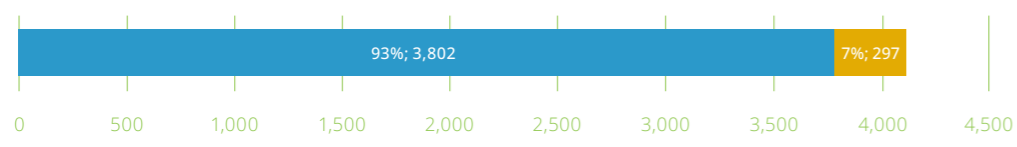
## EMPLOYEE REVIEWS

Employee review is an important part of the development of every employee. It is essential for the successful fulfilling of an employee's role. In 2022, we performed

3,802 performance reviews which represents 92,75 % of all employees of Elevion Group. We are aiming to secure a 100 % rate of employees who received a review.

	Total number of employees [-]	Number of employees receiving regular performance and career development reviews	Rate of employees who receive review [%]
Headcount employees	4,099	3,802	92.75 %

## ELEVION GROUP - EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS (%)



- numbers of employees receiving regular performance and career development reviews
- numbers of employee who are not receiving regular performance and career development reviews

# COLLECTIVE BARGAINING

Although there is no unified approach when it comes to collective bargaining on the group level, the freedom of association is not subject to any restrictions. In some countries, especially

in Germany, employees are organised in trade unions such as IGM (Industriegewerkschaft Metall) or Kreishandwerkerschaft Kassel. In total, 134 employees registered in six trade unions.

# OCCUPATIONAL HEALTH AND SAFETY

Safety of our employees, contractors and customers is a critical value. The health and safety management systems cover the employees, activities of our companies, owned or leased premises of the companies as well as subcontractors based on legal requirements.

## HEALTH AND SAFETY TRAINING

All newcomers undergo mandatory initial occupational health and safety training that is subsequently followed by periodic training at a rate required by local legislation. Training is held either in-person, via virtual call, or through eLearning and is attended by employees and contractors who work on our construction sites. Training sessions are always held during working hours and are provided for free.

## HEALTH AND SAFETY CERTIFICATION

BELECTRIC Group and Metrolog have certified occupational health and safety management systems according to ISO 45001. The Munich and Frankfurt offices of ETS are certified as Safety Certificate Contractors. Rudolf Fritz's occupational health and safety management system is certified in accordance with ILO-OSH-2001 (International Labour Organisation - Occupational Safety and Health). The rest of companies have their own health and safety management system that is based on local legal requirements.

- At Metrolog, initial health and safety training is done personally, and periodic training is carried out in person or in the form of eLearning. Topics covered as part of the training are legal regulations in the field of health and safety, risks of factors occurring in work processes, rules of conduct in the event of an accident, fire protection.
- In addition to general health and safety training, BELECTRIC provides its employees with electrotechnical training, whereas Elevion Holding Italia addresses the specific needs of safety on construction sites.

## OCCUPATIONAL HEALTH SERVICES

Our companies utilize external service providers for occupational health and safety check-ups and inspections as defined by the requirements of local legislation. The quality of occupational health services is assured and provided by competent individuals with recognized qualifications and accreditations. The check-ups are carried out during working hours and at the employer's expense. Employees are examined based on type of job, hazards, harmful factors, or other nuisances present in the workplace.

All occupational health services are conducted with respect to GDPR (General Data Protection Regulation). Confidential personal health-related information of employees is collected only by dedicated personnel to the extent necessary and is not shared externally. Companies do not in any way use the health data obtained as a basis for making decisions regarding the employment or engagement of employees, including termination, demotion, promotion or offering of prospects, compensation or any other favourable or unfavourable treatment.

## SUPPLEMENTARY HEALTH SERVICES

Some of our companies offer their employees a supplementary company health insurance policy:

- At ETS, this includes doctor appointments, glasses, physiotherapy, and the services of a dental hygienist for all employees.
- Some companies within Elevion GmbH offer supplemental health insurance with a health budget, with which a number of offers can be taken advantage of.
- Rudolf Fritz established the program "Fritz Fit" that guarantees every employee cost free health performance up to EUR 600 a year which can be used for medicine, glasses, dental services, massage, etc. Purchasing is easy to handle by a special App.

## WORKER'S PARTICIPATION IN THE HEALTH AND SAFETY AGENDA

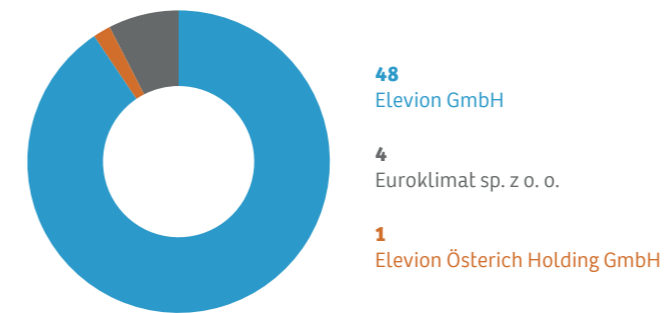
BELECTRIC, Elevion Holding Italia, Euroklimat, Metrolog and ZOHD Group enable active worker participation within the development, implementation, and evaluation of the occupational health and safety management system.

There are also formal joint management-worker health and safety committees in BELECTRIC Group, Hermos, CEZ ESCO II Group, Elevion Deutschland Holding and Elevion GmbH that are required by local legislation. The committees meet on a regular basis to discuss and advise on matters relating to occupational safety and accident prevention as well as risk identification. These commissions also serve workers as a channel to report work-related hazards and hazardous situations without any reprisals.

- BELECTRIC has also implemented safety walks and safety talks to involve employees in updating the risk analysis, consult individual employees to analyse an accident in their own area and participate in the selection and purchase of new safety clothing.
- There are regular safety committee meetings and walk-throughs with management in Hermos. Furthermore, voluntary safety officers have been appointed for this process in all areas.
- An "Arbeitschutz Ausschuss Sitzung" (Occupational Safety Committee Meeting) is held twice a year in each Rudolf Fritz branch. This meeting is held together with the physician, the health and safety team, and employee representatives. During this meeting, all occupational health and safety requirements are checked, the company premises are inspected, and the team also visits, for example, construction sites.

In 2022, we registered a total of 53 Accidents at work which resulted in more than a one-day absence.

Elevion Group - Number of accidents at work with absence of one day or more



Types of Work-related Injuries	Number of incidents	Rate of incidents per 200,000 hours
Injuries with absences of 1 day or more	53	1,95
High-consequence work-related injuries (excl. fatalities as a result of work-related injuries)	0	0
Injuries with absences of more than 3 calendar days	6	0.22
Fatalities as a result of work-related injuries	0	0
Near misses frequency rate (NMFR)	9	0.33

In 2022, there were no cases of recordable work-related ill health reported.

# HEALTHY LIFESTYLE

We support the healthy lifestyle of our employees through various initiatives:

- For example, some companies within the Elevion GmbH cluster provide free fruit to employees, offer massages, or subsidised gym memberships, and organize health days in cooperation with health insurance companies.
- BELECTRIC organizes an annual health day where employees receive information on various diseases and their prevention, and how they can improve their healthy lifestyle and mental health.
- High-Tech Clima requires mandatory psychological testing for some positions.
- ETS employees can take advantage of the Egym/Wellpass program where fitness studios, swimming pools and courses are available with a 50% subsidy.
- Hermos operates a company gym at its site in Mistelgau, which employees and external workers can use free of charge. The company subsidizes its employees with special workplace glasses and provides employees with a free motorcycle safety course.

# DIVERSITY AND INCLUSION

## DIVERSITY AND NON-DISCRIMINATION

Elevion Group is committed to not discriminating at any level as part of the company's ESG guiding principles and priorities. Specific steps in the area of diversity and equal opportunities will be developed in accordance with CEZ Group's strategy during 2023.

- To meet such high standards, BELECTRIC GmbH has developed its own Code of Conduct to secure integrity and compliance with the law. There are three primary objectives to this Code of Conduct. Firstly, it encourages all employees to take responsibility for their own actions and provides employees with the necessary guidance to this end. Secondly, it defines the goals and principles that guide its business activities. Finally, it sets the standards for collaborating with contractual partners and provides a common basis on which to build contractual relationships.

Note:  
Per the GDPR legislation, it is not possible to report information on employee ethnicity.

## SUPPORTING THE EMPLOYMENT OF PERSONS WITH DISABILITIES (PWD)

Elevion Group - Supporting the employing of persons with disabilities

Gender	Total # of employees	Number of employees with disabilities, by gender	% employees per gender	Rate of disabilities [%]
Male	3,318	93	80.95%	2.80%
Female	781	31	19.05%	3.97%
<b>Totals</b>	<b>4,099</b>	<b>3,838</b>	<b>261</b>	<b>3,723</b>

Elevion Group treats each employee with a disability on an individual basis, with the goal of equal opportunity in mind. The Elevion Group is clear when it comes to prohibiting discrimination based on a disability.

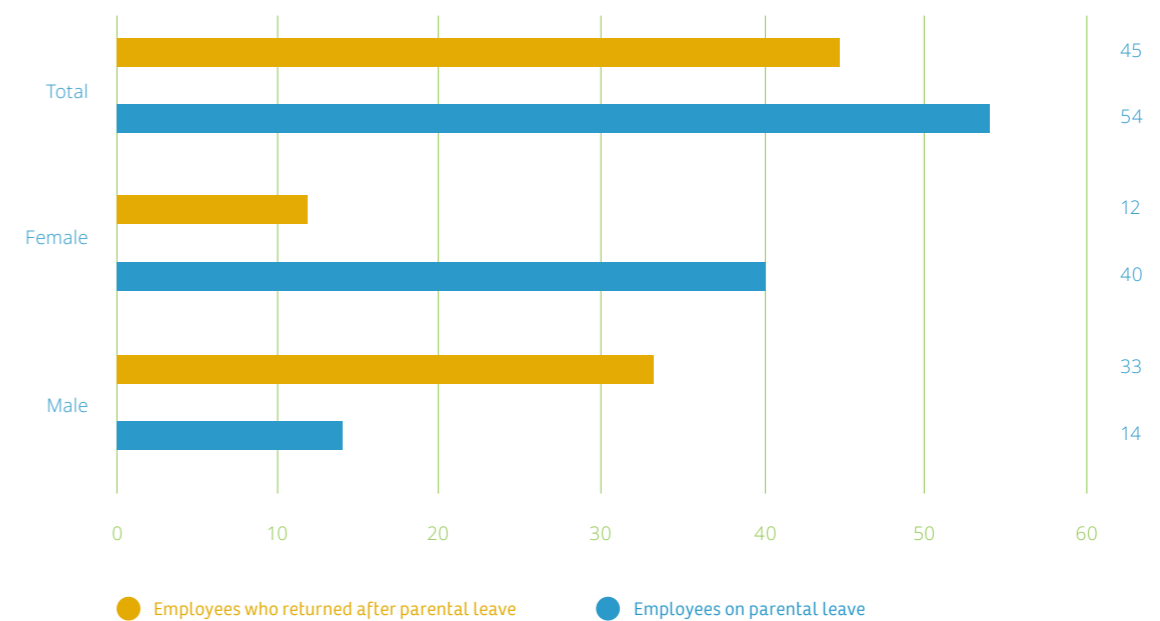
## SENIOR MANAGEMENT FROM LOCAL COMMUNITY

There is a common practice throughout the whole group that the senior management is predominantly hired from the local community.

## PARENTAL LEAVE

- In the case of parental leave, we follow the existing legislation of the individual countries in which Elevion Group operates

## NUMBER OF EMPLOYEES ON PARENTAL LEAVE AND WHO RETURNED AFTER PARENTAL LEAVE





# HUMAN RIGHTS

## CHILD AND FORCED LABOR

All the companies within the Elevion Group fully comply with all the local and European legislation, regulations, and laws regarding child and forced labor. No cases of violating the law are known.

# CHARITIES & NON-PROFIT

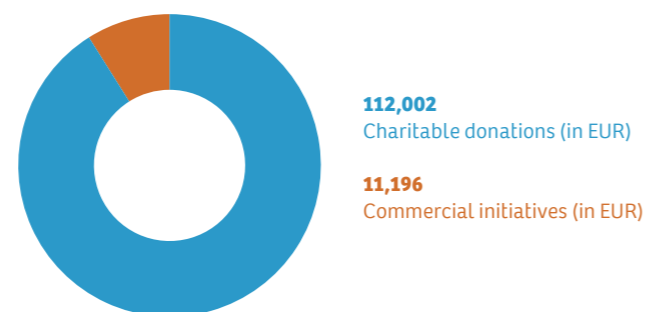
Like many others, we are trying to give back to society and the community. We are supporting many non-profit organizations, initiatives, and charities. Mostly, the focus is on local projects. In 2022, Elevion Group companies donated more than EUR 110,000 in charitable contributions. The total amount spent on philanthropic initiatives in 2022 was EUR 123,198.

- In BELECTRIC, there is a common practice of supporting employees who do volunteer work such as fire department, IHK Examiner, etc. Belectric Israel is part of a program which secures food distribution for Passover for families in need. The food is purchased by other organizations, while Belectric Israel employees assist with the logistic distribution. Another activity of Belectric Israel is establishing new gardens for new Israel residents from Ethiopia.
- Elevion Group regularly meets with representatives of local authorities, organizations, and companies. We discuss support for local projects in the form of donations or promotional sponsoring. We aim to nurture good long-term relationships with shareholders, the media, suppliers, our own employees, and academia. Social activities

of the Elevion Group include, for e.g., local sport sponsorships as well as various local partnerships and donations to local social institutions.

- ZOHD Group promotes charitable activities within local communities. They donate to the local hockey and soccer teams and the medical center.
- Euroklimat organizes donations to those in need. For example, there is an ongoing sponsoring of theatre performances in children's hospitals. Russian aggression in Ukraine resulted in an increased immigration from Ukraine to the bordering states. Euroklimat employees provided direct transportation from the border, helped to organize accommodation and provided assistance in formal matters such as submitting applications to banks and offices, meetings, conversations, etc.

Elevion Group - Philantropy donations, structure



# PUBLIC POLICY

In 2022, there were no financial, in-kind, or any other monetary value contributions of a political nature from the Elevion Group side. All of the companies within the group are in line with local legislation.

# LOCAL COMMUNITIES

In 2022, Elevion Group performed no operations with significant actual or potential negative impact on local communities. All companies within the group approach community engagement aligned with the requirements of local legislation. In addition to that, Elevion Group companies strive to support local communities through various charitable initiatives described in the chapter Charities & Non-profit, as well as focus on projects with a positive impact on local communities:

## Construction of Primary School in Cerekwica, Poland

Metrolog has been working on a project covering the full scope of construction of a new Primary School with a sports hall, including all installations and land development.

## Construction of a Healthcare Clinic on the Island of Sylt, Germany

ETS was commissioned to carry out work at this innovative health resort called Lanserhof Sylt that is going to be one of the most prestigious healthcare clinics of its kind in Germany. The work includes:

- heating technology
- refrigeration
- ventilation technology
- sanitation



# GOVERNANCE

# HIGHEST GOVERNANCE BODY, GOVERNANCE STRUCTURE AND COMPOSITION

Our aim is to act in an ethical and fair manner in our everyday business. Therefore, we do not underestimate governance. Policies, oversight and internal systems are helping us to guarantee our accountability.

## General Meeting

The General Meeting is the highest authority of the EGBV. If there is only one shareholder, this shareholder exercises the scope of the General Meeting.

## Supervisory Board

The Supervisory Board is the supervisory authority of the EGBV, which oversees the implementation of business activities and how the Managing directors exercise their responsibilities.

Members are appointed by the General Meeting for an indefinite period. The General Meeting may at any time suspend or dismiss any Supervisory Board members. The General Meeting may establish a remuneration for Supervisory Board members.

Supervisory Board members: Pavel Cyrani, Martin Novák, Martina Skopová

Supervisory Board members shall not participate in deliberations or the decision-making process in the event of conflict of interest between that Supervisory Board member and the company and the enterprise connected with it. If such a personal

conflict of interest in respect of all Supervisory Board exists, the decision shall be taken by the Supervisory Board subject to the approval of the general meeting.

## Board of Directors

The Board of Directors is the collective statutory authority of the Elevion EGBV and governs the activities of the EGBV and represents EGBV externally. The Managing directors decide on all matters unless they are not reserved for the competence of the General Meeting or the Supervisory Board.

Managing Directors are appointed by the General Meeting for an indefinite period. The General Meeting may at any time suspend or dismiss any Managing Director. The General Meeting shall determine the terms and conditions of employment of the Managing Directors as well as their remuneration.

Managing Directors: Jaroslav Macek, Martina Kubešová, Miroslav Šindelář, Derk Berend Blik

A Managing Director shall not participate in deliberations or the decision-making process in the event of a direct or indirect personal conflict of interest between that managing director and the company and the enterprise connected with it. If such a personal conflict of interest in respect of all Managing directors exists, the decision shall be taken by the Supervisory Board.

## Executive Management (C-level Management)

Executive Management Members: Jaroslav Macek (Chief Executive Officer), Jiří Pecka (Chief Financial Officer), Michal Janda (Chief Commercial Officer), Paulína Friedová (Head of Group Marketing & ESG)

Jaroslav Macek holds the post of CEO and also Managing Director of the Board. There are measures in place to prevent conflicts of interest that may arise from this dual role.

## DIVERSITY OF GOVERNANCE BODIES

Gender diversity of highest governance bodies:

Gender	Board of Directors		Executive Management		Supervisory Board	
	#	%	#	%	#	%
Men	3	75%	3	75%	2	67%
Women	1	25%	1	25%	1	33%
<b>Total</b>	<b>4</b>	<b>100%</b>	<b>4</b>	<b>100%</b>	<b>3</b>	<b>100%</b>

Age diversity of highest governance bodies:

Age group	Board of Directors		Executive Management		Supervisory Board	
	#	%	#	%	#	%
Up to 30 years	0	0%	0	0%	0	0%
30 - 50 years	3	75%	3	75%	2	67%
above 50	1	25%	1	25%	1	33%
<b>Total</b>	<b>4</b>	<b>100%</b>	<b>4</b>	<b>100%</b>	<b>3</b>	<b>100%</b>

## DIVERSITY AT MANAGERIAL LEVEL

We at Elevion Group believe that diversity is a key to the success. We are constantly aiming to achieve a balanced representation of women and men in management structures. At the same time, we are committed to avoiding discrimination on the basis of age. The table below displays data on management composition by gender and age:

Managers are defined as employees who lead teams (have at least 1 subordinate).

Gender diversity in management structures:

Employees with managerial role		
Gender	#	%
Men	973	93%
Women	69	7%
<b>Total</b>	<b>1,042</b>	<b>100%</b>

Age diversity in management structures:

Employees with managerial role		
Age group	#	%
Up to 30 years	77	7%
30 - 50 years	552	53%
above 50	413	40%
<b>Total</b>	<b>1,042</b>	<b>100%</b>

## REMUNERATION AND COMPENSATION

The remuneration process is aligned with the CEZ Group Remuneration Department. In terms of the governance body members, basic salary and potential bonuses are set within the contract. Remuneration of governance bodies is screened to ensure fair remuneration within similar positions across the region. Annual bonuses are based on, among other things, meeting KPIs. KPIs have been set by CEZ Group and are supporting CEZ Group's efforts in the ESG area.

The employee remuneration process differs in each company.

- As one of the examples of best practice that could be mentioned, the process of EGBV Job descriptions are developed for both regular positions and positions within governance bodies. Position evaluations are conducted twice a year and salary updates are based on market screening. That applies for both newly in-demand positions and existing positions with a high focus on equal remuneration.

For instance, the salary of employees returning after parental leave takes into account the evolution of salaries over time.

## ESG GOVERNANCE

Elevion Group Board of Directors and Executive management oversee the overall ESG Strategy of the group as well as the due diligence process to identify and manage the Elevion Group's impacts on the economy, environment and people. Elevion Group Board of Directors is responsible for approving ESG Report, material topics, ESG strategic priorities as well as the overall ESG Strategy.

The CEO appointed Paulina Friedová (Head of Group Marketing & ESG) to manage the day-to-day ESG agenda within the Group. Elevion Group Board of Directors is being updated about the progress on a regular basis. CEZ Group is also consulted on a regular basis about the ESG agenda in Elevion Group.

Elevion Group Board of Directors, Executive management and Head of Group Marketing & ESG are being provided with relevant information from external and internal resources in order to have adequate knowledge, skills, and the experience needed to manage the ESG agenda.

## COMMUNICATION OF CRITICAL CONCERNS

Critical concerns are communicated to respective parties based on their severity and scope. The least severe concerns or concerns related only with activities of a particular company are communicated to the management of the respective company. In case of greater severity or concerns that are related with operations of the whole Group, the concerns are reported to the CEO. All critical concerns are communicated to respective parties, including findings from internal audits and reviews, complaints from the whistleblowing and grievance mechanism. These described mechanisms are covered by CEZ Group.



# ETHICS AND COMPLIANCE

## COMPLIANCE WITH LAWS AND REGULATIONS, INTERNAL POLICIES

Our compliance program was designed at the CEZ Group level to ensure compliance with all applicable laws and regulations and Code of Conduct in our daily business. The responsibility over the compliance agenda has been outsourced to CEZ as part of the service-level agreement between CEZ and EGBV ensuring monitoring of compliance with laws and regulations; consulting of compliance risk prevention measures methodical support of compliance management; development of standardized compliance tools such as methodical processes, plans, forms; operation of Ethical line; compliance checks of business partners and internal audits.

On the CEZ Group level, the Code of Conduct is used to cover the basic forms of conduct, behaviour, and responsibility of each person within the Group, and thus set clear principles and boundaries. The CEZ Group Code of Conduct is based on the legislation of the Czech Republic and of the European Union and fully respects the applicable standards, international conventions on human rights, on fighting corruption, and on protecting the environment. The Code of Conduct covers the following areas:

1. General Principles
2. Shareholders
3. Customers
4. Employees
5. Suppliers
6. Public Authorities and Other Institutions
7. Media
8. Charitable Gifts, Sponsoring
9. Compliance
10. Reputation Protection

As Elevion Group continues to grow, it is critical to ensure that our compliance program is integrated across the whole Group including newly acquired companies. To understand the scope of Elevion Group's current activities in ethics and analyse to what extent these activities correspond to CEZ Group's internal standards, a high-level gap analysis of ethics and compliance activities in Elevion Group was performed in 2022. The analysis showed that:

- There are multiple individuals with partial responsibility for ethics and compliance in selected businesses of Elevion Group
- More than half of 21 major Elevion Group businesses have adopted Code of Conducts and half of the businesses also have access to ethics hotlines

Based on the identified gaps, we strive to focus on the following priorities within the upcoming months:

- Appointment of a dedicated Head of Group Governance, Risk & Compliance at the level of EGBV responsible for ethics and compliance in Elevion Group, who will coordinate the compliance management system in Elevion Group, including the management of compliance risks and reporting on ethics and compliance matters to CEZ Group.
- Adopt a unified Code of Conduct for all Elevion Group businesses (with possible country modifications)
- Start a universal ethics and compliance training program
- Ensure that ethics hotlines are available across Elevion Group and comply with the relevant EU regulations.
- Implement a universal whistleblowing policy and ensure that whistleblowing hotlines are available across Elevion Group and comply with the relevant EU regulations

## PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND RAISING CONCERNS

We are dedicated to preventing, identifying, and correcting negative impacts that we have caused or contributed to. The whistleblowing and grievance mechanisms are covered as part of service level agreement between CEZ Group and EGBV in the form of the Whistleblowing Hotline.

The Whistleblowing Hotline is one of many measures to reduce the risk of unethical or illegal conduct and is used to report violations of the Code of Conduct or concerns about suspected misconduct. The Hotline is designed to ensure the anonymity of all whistleblowers (i.e., employees, customers, business partners, or third parties/public) and to protect them from sanctions, discrimination, and other retaliation.

Information can be submitted via the Intranet, Internet, by email (compliance@cez.cz), or by phone (+ 420211042561), available 24/7. Upon receipt of a report through the Hotline, the Audit and Compliance Department carries out an objective and independent investigation. Based on the relevant findings, the corrective action is taken. The Audit and Compliance Department reviews dozens of notifications each year. Employees learn about the Hotline during mandatory training (initial and regular), in articles on the Intranet, and in the company magazine.

## ANTI-CORRUPTION AND ANTI-COMPETITIVE BEHAVIOUR

As the anti-corruption and anti-competitive behaviour agenda is part of the compliance program, it is addressed on the CEZ Group level. We neither encourage nor tolerate fraud, corruption or breach of competition rules.

The principles are covered in the CEZ Group Code of Conduct. All employees of EGBV including governance bodies undergo compliance training on an annual basis that also contains topics of anti-corruption. As already mentioned, our aim is to implement a universal ethics and compliance training program across the whole Elevion Group in the future. The Code of Conduct also requires employees to comply with competition rules. In general, out of 4,099 employees, approximately 30 % went through anti-corruption training in 2022.

As already mentioned, we are dedicated to adopting a unified Code of Conduct for all Elevion Group businesses based on a Group-wide risk assessment that should also include anti-corruption topics. The following companies are currently systematically identifying and managing corruption risks related to their sectors and activities: D-I-E Elektro, KEI, Metrolog, BELECTRIC Group, Inewa, EGBV, ETS.

In 2022, there were no confirmed incidents of corruption in our companies.

There were no public legal cases regarding corruption, anti-competitive behaviours, or violations of antitrust and monopoly legislation brought against Elevion Group or the employees in 2022.

Elevion Group - Number of employees who have completed anti-corruption training in detail





# MEMBERSHIP ASSOCIATIONS

Elevion Group is a member of several associations, namely:

- BNE (Bundesverband Neue Energiewirtschaft e.V.) - BELECTRIC Group
- BSW (Bundesverband Solarwirtschaft e.V.) - BELECTRIC Group
- BTGA (Bundesindustrieverband Technische Gebäudeausrüstung e.V.) - Elevion Deutschland Holding, Elevion GmbH
- DENEFF (Initiative der Deutschen Unternehmensinitiative Energieeffizienz e.V.) - EEES
- INNOEnergie - Elevion Holding Italia
- Fusion Grant - Elevion Holding Italia
- IHNES (Interregional Hospital Network for Energy sustainability) - Elevion Holding Italia
- Mieszkania dla Ukrainy - Euroklimat

# DATA PRIVACY AND SECURITY

We work with all kinds of data that needs to be protected. The cyber-attacks on networks, information systems, devices, and users can result in:

- The disclosure of sensitive business information, customer data (GDPR), contracts, and intellectual property. Ultimately, the reputation of the Elevion Group and affected entities may be significantly damaged.
- The unavailability of information systems and data can cause business disruption and have a direct financial impact. Prolonged unavailability may affect customer satisfaction and lead to the termination of even long-standing business relationships.

Therefore, we are constantly improving data protection at all levels of the organization.

The Group's entities have implemented numerous organizational and technical controls to prevent the threats from materializing and to minimize the potential impact.

An important part of the Group's information security strategy is also the ongoing training of users and testing of their security awareness.

No cybersecurity incidents were reported in 2022.

# SUSTAINABLE FINANCE

At Elevion Group, we have started to implement the EU taxonomy evaluation. The EU taxonomy is a classification system of economic activities that are considered sustainable from an EU perspective in relation to the EU's stated objectives. The taxonomy provides clear definitions and criteria for sustainable economic activities. However, it is not a list of activities in which entities

are obliged to invest, nor does it set any investment restrictions. Rather, it is an EU tool to redirect private resources towards sustainable activities.

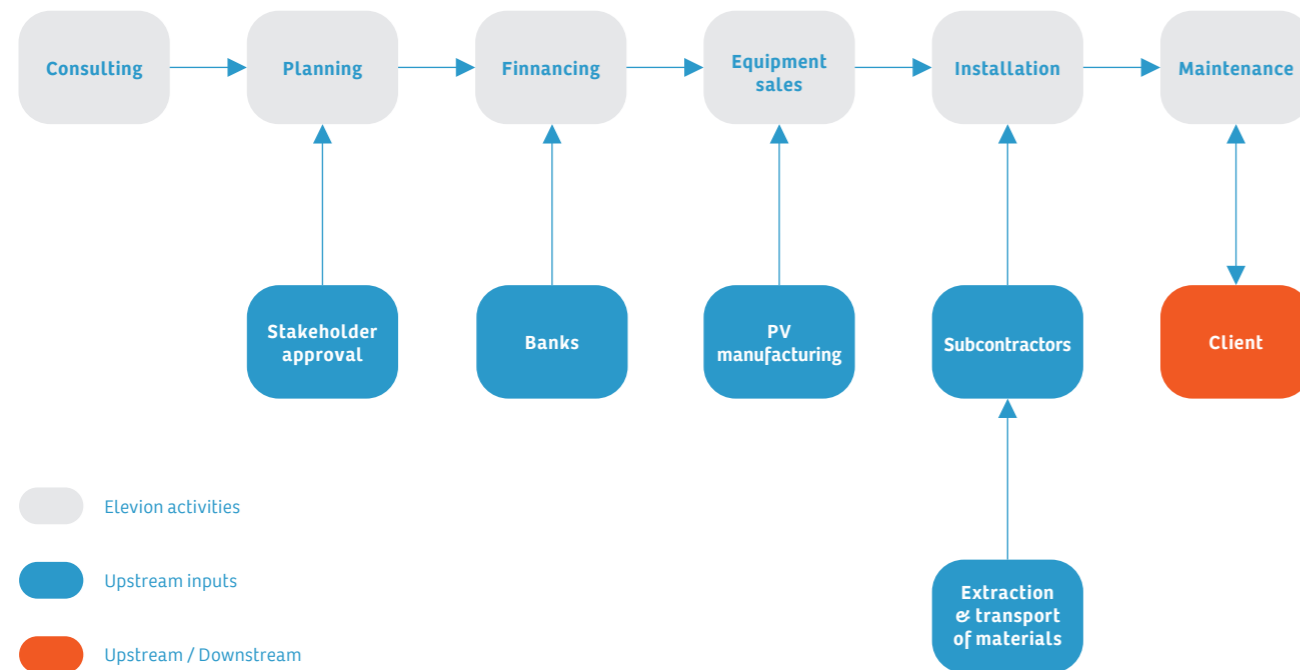
A detailed taxonomy report can be found within Attachment 1.

# SUSTAINABLE SUPPLY CHAIN

## VALUE CHAIN

Our general approach is to cover all customer needs from the very beginning as we call it the 360 approach. Our strategy is to seek out solutions for the entire life-cycle.

## ELEVION - VALUE CHAIN



Note:  
More detailed elaboration of the Value Chain will be done as part of the preparations for the double materiality assessment. Upstream in this case is considered as direct involvement.

## SUPPLY CHAIN MANAGEMENT

At Elevion Group, we understand that we should not only focus on the environmental and social impact of our operations and activities, but also on the impact of our entire value chain. Reducing the impact of our downstream activities is enshrined in our mission statement, which says: "the Elevion Group provides its customers with solutions that seamlessly combine sustainable CO2 reduction, continuous increases in energy efficiency, significant savings in energy costs, and all areas of technical building equipment and services". However, we also see the impact of our downstream activities as essential, as demonstrated by the selection of sustainable supply chain as a top priority topic in the materiality assessment. We understand that supply chain transformation is a long-term mission that requires engagement of all stakeholders, dedication and integrity. However, using a step-by-step approach, we have already started this process.

A significant milestone was reached in 2022 when we conducted our first in-depth internal review to understand the current procurement and supply chain management processes maturity within our companies. The work was divided into three key steps:

1. Qualitative and quantitative analysis of procurement and supply chain management processes in Elevion Group. A survey was conducted in 21 companies which represent 83 % of all Elevion Group purchases in 2021. The survey included 34 questions and 10 data requests for each company.
2. Detailed data analysis of supplier data (circa 7500 individual suppliers reported), and identification of additional potential for joint purchases.
3. Detailed assessment of the procurement process on a sample of more than 40 procurement cases in selected companies (Euroklimat, Hermos, EAB) carried out in cooperation with an external advisor.

It has been concluded that procurement processes differ from company to company. For instance, over 60% of the evaluated companies had formalized procurement rules, 10% of the companies had formalized criteria for supplier nomination and approximately one third of them had implemented a formal process of supplier evaluation.

We identified "champions" that are to be shared within the group as best-practice processes:

- German platform - companies across the region share their experiences with individual suppliers and meet regularly to discuss potential suppliers for framework contracts and other topics. There are more than 100 framework agreements that are actively being used.
- BELECTRIC GmbH performs screening of the new suppliers for environmental criteria. BELECTRIC GmbH also uses an external partner to check all its active suppliers and carriers for international sanctions lists. New suppliers as well as the entire portfolio of active suppliers are inspected on a regular basis.
- EAB developed its own supplier evaluation process where the maximum weight that price accounts for in a decision is 50%, followed by criteria such as product quality, delivery reliability, delivery time, etc.
- ETS has a traceability system for purchased products which covers a limited number of products/raw materials purchased.
- OEM Energy and BELECTRIC Group identify and analyse geopolitical risks related to the regions where its supply chain is located.

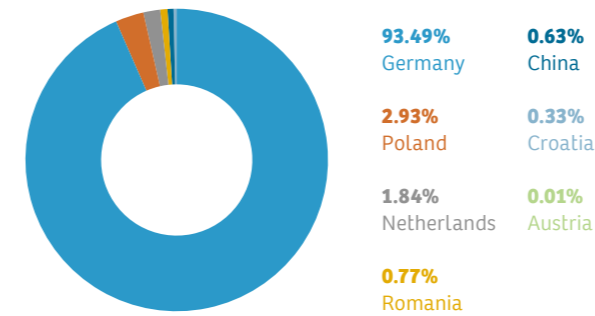
Based on the review findings, we are committed to setting minimum requirements for procurement rules and to ensuring their adoption in Elevion Group companies according to their size, in accordance with predefined criteria, and to regularly monitor compliance with the rules. We are currently developing these common rules which will be part of new procurement policies which are coming to light. The goal is to include not only governance aspects such as compliance checks, the obligation to check sanctions lists



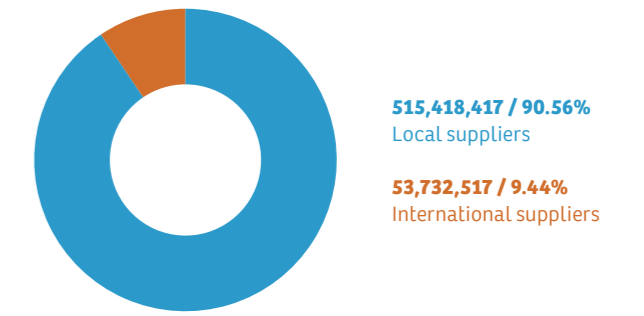
and safeguards to avoid conflicts of interest, but also environmental aspects such as verifying the environmental awareness of suppliers as well as suppliers safeguards in terms of human rights (such as child & forced labour).

Elevion Group is also aware of the new responsibilities resulting from the Supply Chain Due Diligence Act. We are establishing adequate and effective risk management to comply with due diligence requirements.

Elevion Group - Proportion of supply chain by country



Proportion of procurement budget spent on local and international suppliers (% , EUR)



Note:  
The share in the pie chart is based on the total turnover with suppliers in the country. Figures are based on an internal review of purchasing processes conducted in 2022. Based on the materiality threshold, purchasing processes of 21 Elevion Group companies were assessed (accounted for 83% of all Elevion Group purchases in 2021 and 84.5% of Elevion Group reported sales). The chart includes the top 50 suppliers of these companies for the first half of 2022.

### SUPPLIERS/SUBCONTRACTORS ENVIRONMENTAL ASSESSMENT

All suppliers that Elevion Group works with must comply with legal requirements. This also includes the area of environmental protection. Subsidiaries have a high degree of autonomy when selecting subcontractors, based on different considerations, not only environmental. Our aim for 2023 and beyond is to introduce the comprehensive mapping of suppliers in all of the subsidiaries and to implement specific environmental standards

for the selection of suppliers and verification of possible environmental violations along the supply chain.

Currently, the best practice within this field is perceived at Hermos, Rudolf Fritz, Metrolog and BELECTRIC Group who perform supplier/subcontractor assessment within following aspects:

Standard requested from suppliers	Hermos	Rudolf Fritz	Metrolog	BELECTRIC Group
Identification of main environmental risks along the supply chain	x			
System to monitor the environmental performance of existing suppliers		x	x	
Supplier verification system for purchased products/raw materials with ESG claims	x			
Presence of an environmental management by suppliers			x	x
Presence of an environmental policy by suppliers			x	
Prevention and monitoring measures for proper waste management			x	
Monitoring of emissions and compliance with legal limits	x			
Emission reduction targets	x			
Monitoring energy consumption	x			





ATTACHMENTS

# ATTACHMENT NO. 1 – EU TAXONOMY REPORT

## ELEVION GROUP

### CONSOLIDATED DISCLOSURES PURSUANT TO ARTICLE 8 TAXONOMY REGULATION

### FINANCIAL YEAR 2022

### CONTENT

### ARTICLE 8 TAXONOMY REGULATION

### 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 and Green deal initiative by defining specific environmentally sustainable economic activities within the EU Taxonomy classification system.

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 2022, which are associated with Taxonomy-eligible and Taxonomy-aligned economic activities related to the first two environmental objectives (climate change mitigation and climate change adaptation) in accordance with Art. 8 Taxonomy Regulation and Art. 10 (2), Art. 11(2) of the Art. 8 Delegated Act.

## BASIS OF PREPARATION

This consolidated report is prepared on a voluntary basis.

Elevion Group discloses eligibility of its own economic activities based on regulatory requirements of Art. 8 Taxonomy Regulation. The newly adopted changes in the Taxonomy classification in 2022 allowed us to include natural gas and nuclear energy as eligible activities.

# OUR ACTIVITIES

## OVERVIEW

### Eligible, aligned and non-eligible activities

Table 1

Proportion of Taxonomy-eligible, Taxonomy-aligned and Taxonomy-non-eligible economic activities in total turnover, CapEx and OpEx

	Total(tEUR)	Proportion of Taxonomy-eligible economic activities	Proportion of Taxonomy-aligned economic activities	Proportion of Taxonomy-non-eligible economic activities
Turnover	899 258	60%	0%	40%
Capital expenditure (CapEx)	37 638	55%	0%	45%
Operating expenditure (OpEx)	8 397	41%	0%	59%

## 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 as of now) irrespective of whether that economic activity meets any or all of the technical screening criteria laid down in those delegated acts.

An activity is Taxonomy-aligned where it complies with the technical screening criteria as defined in the Climate 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 ECONOMIC ACTIVITIES

We have examined all economic activities carried out by the Group's entities to see which of these are eligible and also aligned in accordance with Annexes I and II to the Climate Delegated Act. The KPI templates below 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
3.5 Manufacture of energy efficiency equipment for buildings	Manufacturing of own compact heat exchangers in a different variants and power units.
4.1 Electricity generation - solar energy	Building and operating own PV power plants based on PPA-contracts (power purchase agreement) a long-term contract between an electricity generator and a customer, usually a utility, government or company.
4.20 Electricity and heat generation - biomass and biogas	Design and installation of a high efficiency CHP to produce electricity and heat (hot water). 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.
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.
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.
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.
7.6 Installation, maintenance and repair of renewable energy technologies	Development, construction, and operation of utility-scale solar power plants, solar panels installations and ongoing maintenance and repair services
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.
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	Providing solutions for the design, construction, and implementation of co-generation plants that utilize fossil gaseous fuels efficiently, solutions related to measurement and precision instrumentation. In the context of high-efficiency co-generation, services related to monitoring and optimizing the performance of co-generation plants and services related to optimizing co-generation plants to achieve maximum energy efficiency and minimal waste.
4.31 Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system	Providing solutions related to measurement and precision instrumentation. In the context of production of heat/cool from fossil gaseous fuels in district heating and cooling systems, services related to monitoring and optimizing the performance of such systems to ensure efficient energy production and distribution.

## RELEVANT JUDGEMENT ON THE TAXONOMY-ELIGIBILITY OF OUR ACTIVITIES

The activities recognized as taxonomy-eligible were identified based on examining the substance of each activity, substantial contribution of the activity to the climate change mitigation objective and its compliance with the description of the particular activity according to the Annexes I and II to the Climate 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 energy sector and corporate services in 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 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 on these criteria and how they have been assessed below.

## DO NO SIGNIFICANT HARM (DNSH)

The Group is aware of the importance of changes and impacts connected with climate change. Not only that the Group generally supports sustainable initiatives, regular monitoring and evaluations of these activities ensure that any potential impact is proactively addressed and potential risks are being diminished.

We see the Taxonomy Regulation as very important, and so we have decided for voluntary reporting this year. For the reporting year 2022, however,

we decided not to present our activities as Taxonomy-aligned mainly due to ongoing improvements of reporting assessment providing sufficient granularity of information necessary to reliably comply with all the „Do no significant harm“ criteria as described in the Appendix A and C of the Annex I to the Climate Delegated Act.

## MINIMUM SAFEGUARDS

We at the Elevion Group are very confident about compliance with Minimum Safeguards 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. As the best practice for assessing Minimum Safeguards that would align with Taxonomy has not yet been fully settled, and as for the 2022 reporting year, we report all our activities as eligible, we have decided to postpone the full assessment of Minimum Safeguards until the best practice is fully settled and available.

Elevion Group considered all the aspects of the technical screening criteria connected with the taxonomy-alignment requirements further determined according to the Substantial contribution, Do no significant harm and Minimum Safeguards criteria and for the first year of individual taxonomy voluntary reporting decided not to proceed the full technical screening assessment and to report taxonomy-eligibility only at Elevion Group level.

The reason for that are expectations of updated regulations, which define all EU-taxonomy objectives and provide a complete detailed list of activities supported as taxonomy-aligned. The more conservative principle also allows us to develop more robust assessment of taxonomy-alignment following the regulators most updated expectations and overall accepted best-practice examples.

## 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. Since the KPIs need to include an assessment of Taxonomy-alignment for the first time for the 2022 reporting period, we do not present comparative figures on alignment. 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

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

The specification of the 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-eligible economic activities in our total turnover has been calculated as the part of net turnover derived from products and services associated with Taxonomy-eligible economic activities (numerator) divided by the net turnover (denominator), in each case for the financial year from 1. 1. 2022 to 31. 12. 2022.

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. 2022” of our Annual Report 2022.

The numerator of the turnover KPI is defined as the net turnover derived from products and services associated with Taxonomy-eligible activities, that is:

- Activity 3.5 “Manufacture of energy efficiency equipment for buildings” generates net turnover from manufacturing of heat exchangers.
- Activity 4.1 “Electricity generation – solar energy” generates net turnover from operating own photovoltaic power plants.
- 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 5.1 “Construction, extension and operation of water collection, treatment and supply systems” generates net turnover from installing water tanks for clean 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.
- 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.
- Activity 4.30 “High-efficiency co-generation of heat/cool and power from fossil gaseous fuels” generates net turnover from operating and/or providing solutions mainly for the design, construction and implementation of co-generation plants that utilize fossil gaseous fuels efficiently.
- Activity 4.31 “Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system” generates net turnover from operating and/or providing solutions mainly for the design, construction and implementation of heating/cooling devices that utilize fossil gaseous fuels efficiently.

# CAPEX KPI

## 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. 2022” of our Annual Report 2022, first row.

## FURTHER EXPLANATIONS

The allocation of Turnover KPI is primarily driven by the particular business activity of each company which complies with the substance of the particular taxonomy defined activity.

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 proceeded according to the most suitable driver. In particular, operating devices which produce electrical energy in accordance with the taxonomy activities allocated their turnover by the volume of the produced electricity in kWh.

## DEFINITION

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

Total CapEx consists of additions to tangible and intangible fixed assets during the financial year, before depreciation, amortization, and any re-measurements, including those resulting from revaluations and impairments, as well as excluding changes in fair value. It includes acquisitions of tangible fixed assets (IAS 16), intangible fixed assets (IAS 38), right-of-use assets (IFRS 16) and investment properties (IAS 40). Additions resulting from business combinations are also included. Goodwill is not included in CapEx because it is not defined as an intangible asset in accordance with IAS 38. For further details on our accounting policies regarding our CapEx, see Chapter 2. “Accounting policies”, explicitly in Paragraph 2. 8. “Property, Plant and Equipment”, Paragraph 2. 9. “Intangible assets, including research and development” and Paragraph 2. 12. “Leases” of our Annual Report 2022.

The numerator consists of the following categories of Taxonomy-eligible CapEx:

- A. CapEx related to assets or processes that are associated with Taxonomy-eligible economic activities (“category (a)”):
- B. We consider that assets and processes are associated with Taxonomy-eligible economic activities where they are essential components necessary to execute an economic activity. Consequently, CapEx invested into the following areas is considered in the numerator of the CapEx KPI: acquisition of new biogas plant producing electricity from biomass, installation and operating PV plants, installation of HVAC and other energy efficient equipment, including capitalized R & D costs in Hermos (FIS) and Belectric (SCADA) etc.
- C. CapEx that is part of a plan to upgrade a Taxonomy-eligible economic activity to become Taxonomy-aligned or to expand a Taxonomy-aligned economic activity (“category (b)”):
- D. CapEx related to the purchase of output from Taxonomy-aligned economic activities and individual measures enabling certain target activities to become low-carbon or to lead to GHG reductions (“category (c)”):

Most investments reported for fiscal year 2022 belong to category a) connected with a performed economic activity.

The most significant eligible CAPEX within the group is recognized in connection with activity 4.20 “Electricity and heat generation – biomass and biogas” which is subject of investments upgrading the biomass plants operating in Italy.

Eligible expenses were also recognized under category 7.5 “Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings” which relates mainly to capitalized internal development costs for “FIS Software”.

This software platform for highly customized industrial and environmental automations integrates machinery into intelligent production complexes and connects them to ERPs to monitor and evaluate machinery and production ensuring transparency in production.

Significant CAPEX is connected also with construction of photovoltaic power plants recognized under category 7.6 “Installation, maintenance and repair of renewable energy technologies” including the capitalised development costs for “SCADA2025 project” - new platform based on Kubernetes with microservices which takes over the legacy data transmission solutions and manages the dataflow of all production data of all PV sites. Furthermore, the eligible expenses were spent on building several photovoltaic power plants operated and generating sustainable energy by companies within the group under taxonomy activity 4.1 “Electricity generation – solar energy”.

Investments under category b) were not recorded in Elevion Group within the reporting period 2022 as the investment plan according to the applicable regulations was not yet available at granularity of individual taxonomy activities.

## RECONCILIATION

Our total CapEx can be reconciled to our consolidated financial statements, see Chapter 3 “Property, Plant and Equipment”, Chapter 5 “Intangible Assets” and Chapter 20 “Leases” of the Annual Report 2022.

They are the total of the movement types (Additions and Acquisition of subsidiaries) for intangible assets, right-of-use assets, property, plant and equipment.



# OPEX KPI

## DEFINITION

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

Total OpEx consists of direct non-capitalized 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 recognized 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 Report 2022). In line with our consolidated financial statements (paragraph 126 of IAS 38), this includes all non-capitalized expenditure that is directly attributable to research or development activities.

- The volume of non-capitalized 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 Report 2022). Even though low-value leases are not explicitly mentioned in the Disclosures Delegated Act, we have interpreted the legislation as to include these leases.
- Maintenance and repair expenditures were determined based on the maintenance and repair costs allocated to our internal cost centres. The related cost items can be found in various line items in our income statement, including production costs (maintenance in operations), sales and distribution costs (such as maintenance of IT systems). This also includes building renovation measures.

In general, this includes costs for services and material costs for daily servicing, as well as for regular and unplanned maintenance and repair measures. These costs are directly allocated to our PP & E. This does not include expenditures relating to the day-to-day operation of PP & E, such as raw materials, cost of employees operating the machinery, electricity or fluids that are necessary to operate PP & E. Amortization and depreciation are also not included in the OpEx KPI.

We exclude direct costs for training and other human resources adaptation needs from the denominator and the numerator. This is because Annex I to the Disclosures Delegated Act lists these costs only for the numerator, which does not allow a mathematically meaningful calculation of 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 field of Elevion Group companies belong 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 the 2022 reporting period in which the OPEX KPI denominator was reported at the amount of 8.397k EUR. The most significant eligible expenditures are then connected mainly with activity 7.6 “Installation, maintenance and repair of renewable energy technologies”, in which the expenses are caused primarily by maintaining the installed photovoltaic devices.

Research and development non-capitalized expenditures are represented solely by company Hermos which develops highly customized software solutions for industry automatization recognized as eligible taxonomy activity 7.5 “Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings”. These costs are related to general test and feasibility studies with no reference to development projects.

# CONTEXTUAL INFORMATION

## TURNOVER KPI

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, and other sources of income. Over the financial year 2022, no key drivers of change were indicated, since this is the first time that we report the detailed overview of eligible economic activities.

### Quantitative breakdown of turnover numerator

	Turnover (tEUR)
Projects and operating lease income	739 403
Sale of goods and products	50 913
Service	107 582
Other	1 360
<b>Total</b>	<b>899 258</b>

## CAPEX KPI

In FY 2022, our Taxonomy-eligible CapEx is associated with activities 4.1, 4.20, 4.30, 4.31, 7.3, 7.5, 7.6 and 9.3. In the table below, we show a breakdown of the amounts included in the numerator.

### Quantitative breakdown of the CapEx indicator at economic activity level (tEUR)

Activity	Additions to PP & E	Internally generated or purchased intangibles	Right-of-use assets	Sum	Thereof acquired through business combinations
4.1	2 121	0	81	2 202	0
4.20	8 906	1 382	1 171	11 459	3 881
4.30	978	3	186	1 167	0
4.31	178	2	143	324	0
7.3	672	6	1 086	1 764	0
7.5	429	1 118	86	673	230
7.6	1 024	680	95	1 236	0
9.3	290	120	0	409	0
<b>Total</b>	<b>21 097</b>	<b>6 697</b>	<b>9 844</b>	<b>37 638</b>	<b>6 122</b>

## OPEX KPI

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	3 208
Non-capitalised leases	0
R & D costs	215

## TURNOVER

Economic activities (1)	Code(s) (2)	Absolute turnover (3)	Proportion of turnover (4)	Substantial contribution criteria						DNSH criteria							Taxonomy aligned proportion of turnover Year N (18)	Taxonomy aligned proportion of turnover Year N-1 (19)	Category (enabling activity) (20)	Category (transitional activity) (21)	
				Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)		Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)					Minimum safeguards (17)
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																					
<b>A.1 Environmentally sustainable activities (Taxonomy-aligned)</b>																					
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		<b>0</b>	0 %															0 %	0 %		
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																					
3.5 Manufacture of energy efficiency equipment for buildings		<b>7 617</b>	1 %															0 %	0 %		
4.1 Electricity generation using solar photovoltaic technology		<b>3 203</b>	1 %															0 %	0 %		
4.20 Cogeneration of heat/cool and power from bioenergy		<b>5 841</b>	1 %															0 %	0 %		
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels		<b>5 639</b>	1 %															0 %	0 %		
4.31 Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system		<b>4 031</b>	1 %															0 %	0 %		
5.1 Construction, extension and operation of water collection, treatment and supply systems		<b>6 425</b>	1 %															0 %	0 %		
7.3 Installation, maintenance and repair of energy efficiency equipment		<b>277 012</b>	51 %															0 %	0 %		
7.5 Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings		<b>49 750</b>	9 %															0 %	0 %		
7.6 Installation, maintenance and repair of renewable energy technologies		<b>151 131</b>	28 %															0 %	0 %		
9.3 Professional services related to energy performance of buildings		<b>31 995</b>	6 %															0 %	0 %		
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		<b>542 645</b>	60 %																		
Total (A.1+A.2)		<b>542 645</b>	60 %																		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																					
Turnover of Taxonomy-non-eligible activities (B)		<b>356 613</b>	40 %																		
Total (A+B)		<b>899 258</b>	100 %																		



CAPEX

Economic activities (1)	Code(s) (2)	Absolute CapEx (4)	Proportion of CapEx (4)	Substantial contribution criteria						DNSH criteria							Taxonomy aligned proportion of CapEx Year N (18)	Taxonomy aligned proportion of CapEx Year N-1 (19)	Category (enabling activity) (20)	Category (transitional activity) (21)		
				Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)		Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)					Minimum safeguards (17)	%
				€EUR	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	Percent	Percent	
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																						
A.1 Environmentally sustainable activities (Taxonomy-aligned)																						
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0 %																		0 %	0 %
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																						
4.1 Electricity generation using solar photovoltaic technology		2 202	6 %																		0 %	0 %
4.20 Cogeneration of heat/cool and power from bioenergy		11 459	30 %																		0 %	0 %
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels		1 167	3 %																		0 %	0 %
4.31 Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system		324	1 %																		0 %	0 %
7.3 Installation, maintenance and repair of energy efficiency equipment		1 764	5 %																		0 %	0 %
7.5 Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings		673	2 %																		0 %	0 %
7.6 Installation, maintenance and repair of renewable energy technologies		1 236	3 %																		0 %	0 %
9.3 Professional services related to energy performance of buildings		409	1 %																		0 %	0 %
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		19 234	51 %																		0 %	0 %
Total (A.1+A.2)		19 234	51 %																		0 %	0 %
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																						
CapEx of Taxonomy-non-eligible activities (B)		18 405	49 %																			
Total (A+B)		37 638	100 %																			

OPEX

Economic activities (1)	Code(s) (2)	Absolute OpEx (3)	Proportion of OpEx (4)	Substantial contribution criteria						DNSH criteria							Taxonomy aligned proportion of OpEx Year N (18)	Taxonomy aligned proportion of OpEx Year N-1 (19)	Category (enabling activity) (20)	Category (transitional activity) (21)		
				Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)		Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)					Minimum safeguards (17)	%
				€EUR	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	Percent	Percent	
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																						
A.1 Environmentally sustainable activities (Taxonomy-aligned)																						
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0 %																		0 %	0 %
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																						
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels		9	0 %																		0 %	0 %
7.5 Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings		370	4 %																		0 %	0 %
7.6 Installation, maintenance and repair of renewable energy technologies		3 083	37 %																		0 %	0 %
9.3 Professional services related to energy performance of buildings		509	6 %																		0 %	0 %
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		3 972	47 %																		0 %	0 %
Total (A.1+A.2)		3 972	47 %																		0 %	0 %
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																						
OpEx of Taxonomy-non-eligible activities (B)		4 426	53 %																			
Total (A+B)		8 397	100%																			



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 best available technologies.	NO
3.	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
<b>Fossil gas related activities</b>		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using 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 fossil gaseous 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 fossil gaseous 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.	<b>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</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
8.	<b>Total turnover KPI</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

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 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.	<b>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</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
8.	<b>Total CapEx KPI</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

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 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.	<b>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</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
8.	<b>Total OpEx KPI</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

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 (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 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.	<b>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</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the turnover KPI</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

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 (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 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.	<b>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</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the CapEx KPI</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

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 (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 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.	<b>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</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the OpEx KPI</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities

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-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	5,639	1%	5,639	1%	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	4,031	0%	4,031	0%	0	0%
7.	<b>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</b>	<b>532,975</b>	<b>59%</b>	<b>532,975</b>	<b>59%</b>	<b>0</b>	<b>0%</b>
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the turnover KPI</b>	<b>542,645</b>	<b>60%</b>	<b>542,645</b>	<b>60%</b>	<b>0</b>	<b>0%</b>

Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities

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-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	1,167	3%	1,167	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	324	1%	324	1%	0	0%
7.	<b>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</b>	<b>17,743</b>	<b>47%</b>	<b>17,743</b>	<b>47%</b>	<b>0</b>	<b>0%</b>
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the CapEx KPI</b>	<b>19,234</b>	<b>51%</b>	<b>19,234</b>	<b>51%</b>	<b>0</b>	<b>0%</b>

Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities

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-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	9	0%	9	0%	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.	<b>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</b>	<b>3,962</b>	<b>47%</b>	<b>3,962</b>	<b>47%</b>	<b>0</b>	<b>0%</b>
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the OpEx KPI</b>	<b>3,971</b>	<b>47%</b>	<b>3,971</b>	<b>47%</b>	<b>0</b>	<b>0%</b>

Template 5 Taxonomy non-eligible economic activities

Row	Economic activities	Amount	Percentage
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%
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%
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%
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%
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	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%
7.	<b>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</b>	<b>356,613</b>	<b>40%</b>
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the OpEx KPI</b>	<b>356,613</b>	<b>40%</b>



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 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.	<b>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</b>	<b>18,405</b>	<b>49%</b>
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the CapEx KPI</b>	<b>18,405</b>	<b>49%</b>

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 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.	<b>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</b>	<b>4,426</b>	<b>41%</b>
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the OpEx KPI</b>	<b>4,426</b>	<b>41%</b>

## ATTACHMENT NO. 3 - GRI INDEX

GRI Standard	Disclosure Number	Disclosure Name Individual requirements ('a', 'b', 'c', etc.) are not listed here	Location of Disclosure	Note	Requirement(s) omitted	Reason	Explanation
<b>GENERAL DISCLOSURES</b>							
GRI 2: General Disclosures 2021	2-1	Organizational details	Elevion Group profile and structure				
GRI 2: General Disclosures 2021	2-2	Entities included in the organization's sustainability reporting	About the report				
GRI 2: General Disclosures 2021	2-3	Reporting period, frequency and contact point	About the report	Reporting period is calendar year - aligned with financial reporting.			
GRI 2: General Disclosures 2021	2-4	Restatements of information	About the report	Not relevant - first report.			
GRI 2: General Disclosures 2021	2-5	External assurance	About the report	This report has not been verified through external assurance.			
GRI 2: General Disclosures 2021	2-6	Activities, value chain, and other business relationships	Elevion Group profile and structure Market position and economic performance Elevion - Value chain				
GRI 2: General Disclosures 2021	2-7	Employees	Key Workforce Statistics, Recruitment & Turnover	Reporting method: headcount as off 31 December 2022.	2-7 b iii.	Information unavailable / incomplete	Non-guaranteed hours employees not covered because of HR system limitations.
GRI 2: General Disclosures 2021	2-8	Workers who are not employees	Other (non-employee) workers	Presented only approach to external workers.	2-7 a,b,c	Information unavailable / incomplete	Non-guaranteed hours employees not covered because of HR system limitations.
GRI 2: General Disclosures 2021	2-9	Governance structure and composition	High governance body, Governance structure and composition, ESG Governance				
GRI 2: General Disclosures 2021	2-10	Nomination and selection of the highest governance body	High governance body, Governance structure and composition		2-10 b	Confidentiality constraints	
GRI 2: General Disclosures 2021	2-11	Chair of the highest governance body	High governance body, Governance structure and composition				
GRI 2: General Disclosures 2021	2-12	Role of the highest governance body in overseeing the management of impacts	ESG Governance				
GRI 2: General Disclosures 2021	2-13	Delegation of responsibility for managing impacts	ESG Governance				
GRI 2: General Disclosures 2021	2-14	Role of the highest governance body in sustainability reporting	ESG Governance, Materiality analysis				

GRI Standard	Disclosure Number	Disclosure Name Individual requirements ('a', 'b', 'c', etc.) are not listed here	Location of Disclosure	Note	Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-15	Conflicts of interest	High governance body, Governance structure and composition				
GRI 2: General Disclosures 2021	2-16	Communication of critical concerns	Communication of critical concerns		2-16b	Confidentiality constraints	
GRI 2: General Disclosures 2021	2-17	Collective knowledge of the highest governance body	ESG Governance				
GRI 2: General Disclosures 2021	2-18	Evaluation of the performance of the highest governance body	Remuneration and compensation		2-16c	Confidentiality constraints	
GRI 2: General Disclosures 2021	2-19	Remuneration policies	Remuneration and compensation				
GRI 2: General Disclosures 2021	2-22	Statement on sustainable development strategy	Message from Chairman of Executive Committee				
GRI 2: General Disclosures 2021	2-23	Policy commitments	Compliance with laws and regulations, Internal policies				
GRI 2: General Disclosures 2021	2-24	Embedding policy commitments	Compliance with laws and regulations, Internal policies				
GRI 2: General Disclosures 2021	2-25	Processes to remediate negative impacts	Processes to remediate negative impacts and raising concerns				
GRI 2: General Disclosures 2021	2-26	Mechanisms for seeking advice and raising concerns	Processes to remediate negative impacts and raising concerns				
GRI 2: General Disclosures 2021	2-27	Compliance with laws and regulations	Compliance with laws and regulations, Internal policies		2-27	Confidentiality constraints	
GRI 2: General Disclosures 2021	2-28	Membership associations	Membership associations				
GRI 2: General Disclosures 2021	2-29	Approach to stakeholder engagement	Stakeholders				
GRI 2: General Disclosures 2021	2-30	Collective bargaining agreements	Collective bargaining	Reported number of employees covered instead of %.			
<b>MATERIAL TOPICS</b>							
GRI 3: Material Topics 2021	3-1	Process to determine material topics	Materiality Analysis, Stakeholders				

GRI Standard	Disclosure Number	Disclosure Name Individual requirements ('a', 'b', 'c', etc.) are not listed here	Location of Disclosure	Note	Requirement(s) omitted	Reason	Explanation
GRI 3: Material Topics 2021	3-2	List of material topics	Materiality Analysis				
GRI 3: Material Topics 2021	3-3	Management of material topics		Captured within particular sections			
<b>ECONOMIC</b>							
GRI 201: Economic Performance (2016)	201-1	Direct economic value generated and distributed	Direct Economic Value Generated: Consolidated income statement, p. 148				
			Direct Economic Value Distributed: Consolidated income statement, p. 132; Chapter 22. Personnel, p. 133; Chapter 24. Financial items, p. 135; Chapter 25. Income taxes, p. 136				
			Economic Value Retained	See Direct economic value generated and distributed reference			
GRI 201: Economic Performance (2016)	201-2	Financial implications and other risks and opportunities due to climate change	ESG-related risks and opportunities		201-2 a iii, v	Information unavailable / incomplete	Financial implications and costs of actions will be elaborated in future reports.
GRI 202: Market Presence (2016)	202-2	Proportion of senior management hired from the local community	Senior management from local community	Only management approach description.		Information unavailable / incomplete	HR system limitations.
GRI 203: Indirect Economic Impacts (2016)	203-1	Infrastructure investments and services supported	Local communities	Only commercial investments.			
GRI 203: Indirect Economic Impacts (2016)	203-2	Significant indirect economic impacts	Charities & Non-profit		203b	Not applicable	
GRI 204: Procurement Practices (2016)	204-1	Proportion of spending on local suppliers	Supply chain management				
GRI 205: Anti-corruption (2016)	205-1	Operations assessed for risks related to corruption	Anti-corruption and Anti-competitive Behaviour	Only qualitative description of processes.	2-21	Information unavailable / incomplete	Unified anti-corruption system on group level is under development.
GRI 205: Anti-corruption (2016)	205-2	Communication and training about anti-corruption policies and procedures	Anti-corruption and Anti-competitive Behaviour		205-2 c	Information unavailable / incomplete	Currently no records on communication of anti-corruption procedures to business partners.
GRI 205: Anti-corruption (2016)	205-3	Confirmed incidents of corruption and actions taken	Anti-corruption and Anti-competitive Behaviour	No incidents in 2022.			
GRI 206: Anti-competitive Behavior (2016)	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Anti-corruption and Anti-competitive Behaviour	No legal actions in 2022.			

GRI Standard	Disclosure Number	Disclosure Name Individual requirements ('a', 'b', 'c', etc.) are not listed here	Location of Disclosure	Note	Requirement(s) omitted	Reason	Explanation
<b>ENVIRONMENTAL</b>							
GRI 302: Energy (2016)	302-1	Energy consumption within the organization	Energy				
GRI 302: Energy (2016)	302-2	Energy consumption outside of the organization	Energy				
GRI 302: Energy (2016)	302-3	Energy intensity	Energy				
GRI 303: Water and Effluents (2018)	303-1	Interactions with water as a shared resource	Water				
GRI 303: Water and Effluents (2018)	303-3	Water withdrawal	Water		303-3 b	Information unavailable / incomplete	Currently no detailed information on water withdrawal from water stressed areas.
GRI 304: Biodiversity (2016)	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Environmental protection during construction	Only management approach description.			
GRI 305: Emissions (2016)	305-1	Direct (Scope 1) GHG emissions	Carbon footprint - Scope 1				
GRI 305: Emissions (2016)	305-2	Energy indirect (Scope 2) GHG emissions	Carbon footprint - Scope 2				
GRI 305: Emissions (2016)	305-4	GHG emissions intensity	Carbon footprint - Emission intensity overview				
GRI 306: Waste (2020)	306-3	Waste generated	Waste management and circular economy				
GRI 306: Waste (2020)	306-4	Waste diverted from disposal	Waste management and circular economy				
GRI 306: Waste (2020)	306-5	Waste directed to disposal	Waste management and circular economy				
GRI 308: Supplier Environmental Assessment (2016)	308-1	New suppliers that were screened using environmental criteria	Suppliers/Subcontractors environmental assessment	Only management approach description.		Information unavailable / incomplete	Currently no detailed information on number of suppliers screened by environmental criteria.
<b>SOCIAL</b>							
GRI 401: Employment (2016)	401-1	New employee hires and employee turnover	Recruitment & Turnover				
GRI 401: Employment (2016)	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Employee benefits	Description of some cases of benefits	401-2	Information unavailable / incomplete	HR system limitations.

GRI Standard	Disclosure Number	Disclosure Name Individual requirements ('a', 'b', 'c', etc.) are not listed here	Location of Disclosure	Note	Requirement(s) omitted	Reason	Explanation
GRI 401: Employment (2016)	401-3	Parental leave	Parental leave		401-3 a, d, e	Information unavailable / incomplete	HR system limitations.
GRI 403: Occupational Health and Safety (2018)	403-1	Occupational health and safety management system	Occupational Health and safety				
GRI 403: Occupational Health and Safety (2018)	403-2	Hazard identification, risk assessment, and incident investigation	Worker's participation In the health and safety agenda	Risk identification and reporting via health & safety committees.			
GRI 403: Occupational Health and Safety (2018)	403-3	Occupational health services	Occupational health services				
GRI 403: Occupational Health and Safety (2018)	403-4	Worker participation, consultation, and communication on occupational health and safety	Worker's participation In the health and safety agenda	Health & safety committees.			
GRI 403: Occupational Health and Safety (2018)	403-5	Worker training on occupational health and safety	Health and safety training				
GRI 403: Occupational Health and Safety (2018)	403-6	Promotion of worker health	Supplementary health services, Healthy lifestyle				
GRI 403: Occupational Health and Safety (2018)	403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational health and safety				
GRI 403: Occupational Health and Safety (2018)	403-8	Workers covered by an occupational health and safety management system	Occupational health and safety	Only qualitative statement.		Information unavailable / incomplete	HR system limitations.
GRI 403: Occupational Health and Safety (2018)	403-9	Work-related injuries	Worker's participation In the health and safety agenda	Statistics available only for own employees.	403-9 b, c, d, f	Information unavailable / incomplete	HR system limitations.
GRI 403: Occupational Health and Safety (2018)	403-10	Work-related ill health	Worker's participation In the health and safety agenda	Statistics available only for own employees - no ill health reported in 2022.	403-10 b, c, d	Information unavailable / incomplete	HR system limitations.
GRI 404: Training and Education (2016)	404-1	Average hours of training per year per employee	Education & training		Missing dropdown by gender and employee category.	Information unavailable / incomplete	HR system limitations.
GRI 404: Training and Education (2016)	404-2	Programs for upgrading employee skills and transition assistance programs	Education & training		404-2 b	Not relevant	Currently no transition assistance programs in place.
GRI 404: Training and Education (2016)	404-3	Percentage of employees receiving regular performance and career development reviews	Education & training		Missing dropdown by gender and employee category.	Information unavailable / incomplete	HR system limitations.
GRI 405: Diversity and Equal Opportunity (2016)	405-1	Diversity of governance bodies and employees	Diversity of governance bodies, Key Workforce Statistics		Numbers are not reported per employee category.	Information unavailable / incomplete	HR system limitations.
GRI 406: Non-discrimination (2016)	406-1	Incidents of discrimination and corrective actions taken	Diversity and inclusion	No incidents in 2022.			

GRI Standard	Disclosure Number	Disclosure Name Individual requirements ('a', 'b', 'c', etc.) are not listed here	Location of Disclosure	Note	Requirement(s) omitted	Reason	Explanation
GRI 413: Local Communities (2016)	413-1	Operations with local community engagement, impact assessments, and development programs	Charities & Non-profit Local communities Environmental compliance	Only qualitative description of processes.	413-1		
GRI 413: Local Communities (2016)	413-2	Operations with significant actual and potential negative impacts on local communities	Local communities Environmental compliance	Only qualitative description of processes.	413-2		
GRI 414: Supplier Social Assessment (2016)	414-1	New suppliers that were screened using social criteria	Supply chain management	Only qualitative description of processes - common supply chain rules are currently being prepared.	414-1		
GRI 415: Public Policy (2016)	415-1	Political contributions	Public policy	No political contributions in 2022.			
GRI 418: Customer Privacy (2016)	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Data privacy and security				





