



Social Policy and Standards



sonnedix



Introduction

Integrating our corporate sustainability policies and standards into our daily business practices is key to achieving our purpose to power a bright future. It is what allows us to operate sustainably and ethically across all aspects of our business – from development and financing, to construction and long-term operation.

This document outlines Sonnedix's Social Policy and supporting topic-specific standards that guide our approach to social sustainability. Our approach to health and safety is outlined in a separate policy statement, which can be found [here](#).

Objectives

To provide leadership, management, staff, and third parties working with us or on our behalf with guidance on the application and administration of Sonnedix' social sustainability commitments

Responsibilities

This Policy is owned by the General Counsel, with the Head of ESG responsible for ensuring it remains current, relevant, and effectively communicated.

Everyone who works for Sonnedix, either directly or indirectly, is expected to understand and assist in implementing this policies. The standards contained within are the minimum expected and where local legislation provides higher standards then these should be adopted.

Scope

The policies and associated standards apply across the Sonnedix Group, including staff and third parties working with us or on our behalf, and are available via the corporate Sonnedix website.

Review

We review the policy content periodically, at least every two years, taking into account any developments in legislation, best industry practice or business strategy.



Our Sustainability framework is fundamental to how we work, whether we are striving to protect the environment, empower tomorrow's problem-solvers, be a good neighbour in local communities where we operate or adhere to the high standards of safety, accountability, transparency and diversity.

Axel Thiemann

CEO





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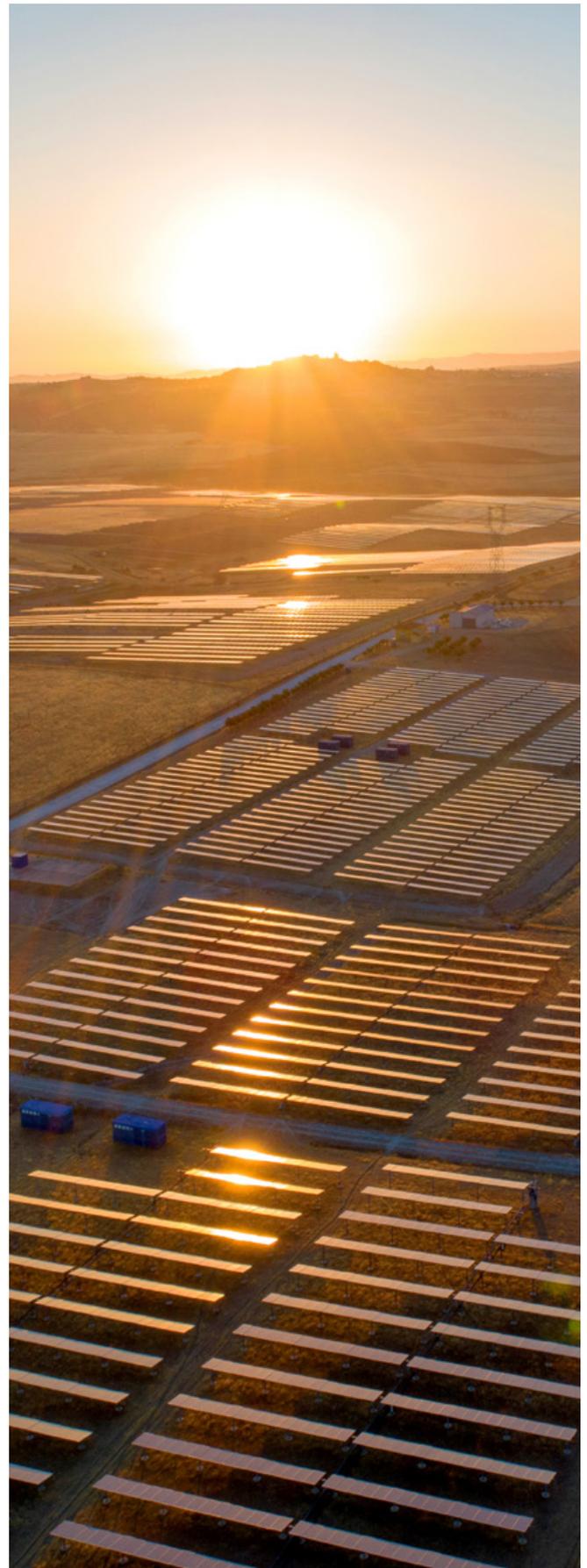
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The Social Policy

At Sonnedix, we are committed to generating clean energy in ways that contribute positively to the communities and cultures in which we operate. We strive to minimise negative social impacts, and also to identify opportunities that deliver social value.

This policy commits Sonnedix to:

- **Leadership:** Ensure social risk management and engagement is driven by Senior Leadership, who maintain accountability for the implementation and oversight of our Social Policy and Standards
- **Management system:** Embed social risk and impact considerations into our operations as part of our risk management approach
- **Compliance:** Conduct our business activities in compliance with the standards contained within this document, as well as all applicable laws and regulations. This includes alignment with internationally recognised human and labour rights standards issued by organisations such as the International Labour Organization (ILO), the Organisation for Economic Co-operation and Development (OECD), the United Nations (UN), and the International Finance Corporation (IFC), where relevant
- **Risk management:** Proactively identify and mitigate social risks, and ensure social and community impact is considered across our business activities and investment decisions
- **Positive impact:** Develop and implement initiatives at both project and corporate levels that enrich communities and promote social development. Ensure any donations and gifts are fully vetted for compliance with applicable laws and regulations and in accordance with company requirements
- **Incident management:** Investigate labour and community-related incidents thoroughly, share lessons learned across the organisation and use them to inform continuous improvement
- **Awareness and training:** Communicate this policy and its supporting standards both internally and externally, including with third parties working on our behalf. Provide training to employees to ensure they understand our social commitments
- **Transparency and accountability:** Monitor and report on our social impact and progress towards our social commitments
- **Addressing concerns:** Establish a formal mechanism for internal and external stakeholders to raise concerns, whether related to business integrity or project-related environmental and social impacts. Ensure all concerns are handled respectfully, consistently, and employees and external stakeholders feel safe and supported to report issues, with a clear commitment to non-retaliation for concerns raised in good faith

This policy is supported by topic-specific standards that further define our approach to key social sustainability areas, such as community engagement, social impact and human and labour rights.



Community engagement and social impact

Engaging stakeholders, including local communities, authorities, business partners, and other relevant groups, is a core part of how Sonnedix operates responsibly. We aim to build long-term, mutually-beneficial relationships with our key stakeholders, and contribute to local development through targeted social impact initiatives.

01 | Community engagement

While stakeholder engagement applies across our broader operations and partnerships, this standard focuses on project-level engagement, where the potential for direct environmental and social impact is greatest.

Local project teams are expected to lead community and local stakeholder relationships, given their understanding of the cultural, political, linguistic, and social context of each individual project. The approach should be tailored to the context, scale, and risk profile of each project to ensure efforts are commensurate with local needs, sensitivities, and expectations. Where appropriate, particularly in complex or high-risk scenarios where a more specialised approach may be required, projects should consider engaging qualified professionals

to support effective engagement. In these cases, the ESG team should be kept informed to ensure consistency in approach and compliance with our environmental and social policies and standards.

Where Sonnedix is the project developer, we take ownership of the community engagement process throughout the project lifecycle. For projects developed by third parties, we assess prior engagement and assume responsibility following the acquisition.

Sonnedix aligns with good international industry practice for stakeholder engagement, including those outlined by the International Finance Corporation (IFC).

02 | Indigenous peoples

Indigenous communities are an important stakeholder group in our broader community engagement efforts, and respect for their connection to land, culture, and heritage is a core part of responsible project development. This standard applies in situations where indigenous communities may be affected by Sonnedix projects, whether through residence, seasonal migration, customary use, or ancestral ties to the land.

The relocation or resettlement of indigenous peoples is not an activity with which Sonnedix wishes to be involved and this action would not be approved under our policies.

If there is any possibility that a project may impact indigenous peoples or lands associated with them, it is essential that the ESG team is notified and the principles to the right are upheld:

1. Identify affected communities through a suitable competent assessment of risks and impacts.
2. Avoid adverse impacts wherever possible, and where unavoidable, prepare an Indigenous Peoples Plan through a process of Informed Consultation and Participation (ICP).
3. Apply Free, Prior and Informed Consent (FPIC) in cases involving significant impacts or sensitive circumstances.
4. Respect mixed and urban indigenous communities, ensuring their views are considered where collective attachment to land exists.



03 Cultural heritage

The protection of cultural heritage is vital for both current and future generations, recognising the deep connections communities may hold with culturally significant locations, objects, and practices. This includes both tangible heritage, such as historical sites, artefacts, and monuments, as well as intangible heritage, including traditions, languages, and cultural expressions.

To preserve cultural heritage, the following principles should be upheld across Sonnedix's projects and operations:

1. Identify and assess impacts on cultural heritage and avoid harm by designing and siting our projects in locations without any damage to cultural heritage.
2. Engage stakeholders through a structured process when cultural heritage may be affected, ensuring that community perspectives and regulatory requirements are fully considered.
3. Where a project is likely to impact on or involves the removal of cultural heritage, appoint competent experts to assess potential impacts and recommend appropriate control and protection measures, in line with local laws and internationally recognised practices.
4. Ensure contractors implement 'Chance Find' procedures on all Sonnedix projects, ensuring that any unexpected finds are protected, assessed by qualified experts, and managed appropriately before any further activity occurs.
5. Respect and, where possible, promote intangible cultural heritage, including local customs and traditions.





04 | Community grievance mechanism

Sonnedix strives to maintain open, respectful, and transparent communication with external stakeholders across all operations. As part of this commitment, we ensure that third parties, including community members, suppliers, contractors, customers and other stakeholders, have access to clear and accessible channels to raise concerns or complaints. This includes our global [Integrity Reporting](#) channel, which provides access to the independent Ethico Portal and Hotline in local languages.

At the project-level, the community grievance mechanism details should be clearly displayed at all construction and operational sites and communicated through local stakeholder engagement. Depending on the context, additional

means for raising grievances should be considered to ensure inclusivity, particularly for those unable to report through digital means. These may include a designated point of contact on site, a physical drop-box or telephone contact details.

All project-level community grievances are reviewed and addressed by the ESG and Ethics & Compliance teams. Depending on the nature of the concern, they may be shared with local project teams for corrective action, taking into account any requests for confidentiality or other sensitivities. We recognise that any concerns, regardless of its perceived severity, can have a meaningful impact and must be handled in a respectful, timely, and consistent manner, in line with Sonnedix's values and ethical standards.



05 | Social impact initiatives

Social impact initiatives are an important part of how Sonnedix gives back, beyond generating renewable energy. These can be in the form of charitable donations, volunteering, emergency relief, and broader environmental and social support. In some jurisdictions, such initiatives are embedded in permitting conditions, and we remain accountable to the authorities that set them. In other cases, our support is voluntary, driven by our values and our desire to build lasting, positive relationships with local stakeholders.

Given the global reach of our operations, community needs vary significantly. To provide consistent guidance and maximise impact, Sonnedix aligns its financially-supported impact initiatives with four core focus areas, while prioritising countries where we operate. This approach helps us to focus our effort where we can build more meaningful, long-term relationships and deliver more targeted impact. Teams are expected to consider and reflect these principles when recommending initiatives.



Educating tomorrow's problem solvers

We support initiatives that build awareness and skills among young people to help them engage with the opportunities and challenges of the energy transition.

Example activities include:

- Youth education and development – collaborating with individuals, schools and youth organisations to support learning, including initiatives that enhance access to education and strengthen youth-focused infrastructure.
- Technical training and support – providing skills development opportunities for individuals and groups to support career pathways in clean energy.



Preserving local environment and heritage

Recognising that the local environment includes cultural and historical aspects, we support initiatives that protect biodiversity, cultural heritage, and environmental resources. Supporting the preservation of these assets strengthens our connection to the communities we serve.



Supporting communities through clean energy

Harnessing our knowledge, experience, and resources to benefit the communities in which we operate is a natural extension of our mission. Using clean energy technologies to support community-led initiatives, such as solar-powered lighting in local community spaces, is an effective way to leverage our unique capabilities in response to local needs.



Emergency and disaster relief

Sonneditx recognises that communities in which we operate may face a range of emergencies, from natural disasters such as floods and wildfires to other crises that disrupt daily life. Where appropriate, we may support local or national relief efforts to help restore essential services, infrastructure and aid local recovery.

In addition to the four core focus areas, Sonnedix may consider supporting other community initiatives on a case-by-case basis. These may include activities that align with clearly identified local development needs and are consistent with our business objectives and areas of competence.

Any community initiatives and donations must be reviewed and approved by both the ESG and Ethics & Compliance teams prior to any commitment being made to external stakeholders. This is done through the completion and submission of the Community Activity and Donation Form, which ensures compliance with laws and regulations, our anti-bribery and donations policies, governance processes, and the four pillars in this standard.



Human and labour rights

At Sonnedix, we recognise that the rapid expansion of renewable energy infrastructure brings both opportunity and responsibility. As a global renewable energy producer, we strive to uphold the highest standards of human and labour rights across our operations and supply chain.

We understand that sourcing equipment and materials for new projects, particularly within complex global supply chains, can carry elevated risks of human rights abuses, including forced labour, child labour, and unsafe working conditions. We stand firmly against all forms of human and labour rights violations and will not knowingly engage with contractors, suppliers, or partners who breach these principles.

We respect all internationally recognised human rights, including the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. Our business practices are guided by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Responsible Business Conduct, and we expect those working with us or on our behalf to do the same.

To support transparency and accountability, our [Integrity Reporting](#) channel remains available for reporting any concerns related to our activities, including potential human and labour rights violations.

We are committed to identifying and addressing the human rights issues most relevant to our operations and supply chain. Our principles include:

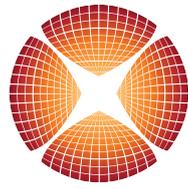
- **Preventing the use of conflict minerals in the supply chain:** We actively work to avoid sourcing materials linked to conflict zones, aiming to ensure our procurement practices do not contribute to human rights abuses or armed conflict
- **Preventing forced and compulsory labour, and child labour:** We proactively assess and address risks across our operations and supply chain, and expect all suppliers, contractors, and business partners to align with internationally recognised human and labour standards

- **Providing reasonable working hours and fair wages:** We promote fair compensation and working hours, recognising the importance of decent work conditions for all workers
- **Ensuring just and favourable working conditions:** We strive to foster safe, respectful, and equitable workplaces, and continuously improve working conditions
- **Protecting the health, safety, and wellbeing of workers:** We uphold high standards of health and safety, actively identify and mitigate risks, and promote a culture of continuous improvement as per our Health and Safety Policy
- **Respecting diversity and preventing discrimination:** We promote inclusive practices and aim to ensure all individuals are treated fairly, regardless of background or identity
- **Adhering to collective bargaining agreements where they exist:** We respect the rights of workers to organise and honour collective bargaining agreements, where applicable
- **Respecting employees' right to freely associate:** We support freedom of association and aim to ensure employees can join or form organisations of their choosing without fear of retaliation.

Sonnex has established a process to identify, assess, and mitigate risks related to human and labour rights across our operations and supply chain.

The ESG team conducts human rights due diligence for all new suppliers and contractors prior to contract signing. This is followed by pre-production audits where relevant, covering human and labour rights criteria. Key suppliers, particularly those providing modules and battery energy storage systems, are required to provide traceability maps, with selected samples subject to audit. Ongoing monitoring of existing suppliers and contractors enables us to proactively identify and address potential human rights risks, ensuring appropriate follow-up.

Person Responsible / Policy Owner:	The General Counsel / Legal
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