



SUSTAINABILITY
Statement 2024

TABLE OF CONTENTS

Introduction		Climate Change	32-35	Employees	44-53	Affected Communities	54-59
Letter of the CEO	3	Strategy		Strategy		Strategy	
Highlights	4	Transition Plan	33	Material impacts, risks and opportunities	45	Material impacts, risks and opportunities	55
Group History	5	Climate resilience analysis	33	Impact, risk and opportunity management		Impact, risk and opportunity management	
Participation and awards	6-7	Impact, risk and opportunity management	33	Policies	45	Policies	56
		Climate change policies	33	Processes for engaging employees	47	Processes for engaging with affected communities	57
				Channels to raise concerns	47	Channels to raise concerns	58
				Actions	48	Actions	59
ESRS 2 General Disclosures	8-26	Metrics		Metrics and targets		Business conduct	60-63
About this report	9	Metrics - Energy	34	Targets	49	Governance	
Additional information	9	Metrics – Emissions	35	Metrics – Characteristics of the undertaking’s employees	49	The role of the administrative, supervisory and management bodies	61
Time horizons	9	Anticipated financial effects from risks and opportunities	35	Metrics – Characteristics of non-employee workers	50	Impact, risk and opportunity management	61
Value chain metrics	9			Metrics – Collective bargaining coverage and social dialogue	50	Policies and corporate culture	61
Measurement uncertainty, assumptions and judgements	9			Metrics – Diversity	50	Management of relationships with suppliers	62
Changes against last year	9			Metrics – Adequate wages	51	Prevention and detection of corruption and bribery	62
				Metrics – Social Protection	51	Metrics and targets	
Governance				Metrics – Persons with disabilities	51	Confirmed incidents of corruption or bribery	63
The role of Management	10			Metrics – Training and skills development	51	Political influence and lobbying activities	63
Sustainability governance	11			Metrics – Health and safety	52	Payment practices	63
Sustainability-related performance on incentive schemes	11			Metrics – Work-life balance	52		
Statement on due diligence	11			Metrics – Compensation	52		
Risk management and internal controls over sustainability reporting	12			Metrics – Incidents, complaints and severe human impacts	53		
		Biodiversity and ecosystems	40-43			GRI Index	64-66
Strategy		Strategy					
Business model and value chain	13	Material impacts, risks and opportunities	41				
Stakeholder engagement	17	Impact, risk and opportunity management					
Material impacts, risks and opportunities	19	Policies	41				
		Actions	42				
Impact, risk and opportunity management		Metrics and targets					
Processes to identify and assess material impacts, risks and opportunities	24	Targets	43				
Disclosure requirements in ESRS covered by the undertaking’s sustainability statement	26	Metrics	43				
		Financial effects	43				

Watch our Sustainability Statement video here:



LETTER OF THE CEO



Aristotelis Chantavas
CEO of Principia

It is my distinct pleasure to present Principia’s inaugural Sustainability Report, a testament to our unwavering commitment to advancing a cleaner and more sustainable future. This report, voluntarily prepared in line with the CSRD requirements, highlights our dedication to transparency, accountability, and responsible business practices.

2024 marked a transformative year for Principia. As a joint venture between Enel SpA and funds managed by Macquarie Asset Management, we have leveraged our combined expertise and resources to accelerate Greece’s energy transition. Our vision is clear: to foster sustainable growth through innovative solutions while contributing to the prosperity of local communities.

Our commitment to environmental stewardship is reflected in our significant achievements. Today, we successfully operate 66 renewable energy plants with a total installed capacity of 577 MW, generating over 1.1 TWh of clean energy. We are equally proud of our outstanding safety performance and operational excellence,

driven by a strong safety culture and the dedication of our 137 employees across our headquarters and regional offices.

With an ambitious 5.5 GW pipeline, we are poised to expand our contribution to Greece’s green energy landscape. Furthermore, we are committed to achieving net-zero emissions by 2040, focusing on reducing energy intensity and lowering our GHG emissions intensity. Our ongoing investments in advanced robotics and data-driven optimization will continue to maximize energy output while minimizing environmental impact.

Our circular economy initiatives are also central to our sustainability efforts, optimizing resource use, reducing waste, and integrating sustainable procurement practices. We are equally committed to addressing energy poverty in local communities, ensuring our work generates meaningful long-term social impact.

At Principia, our people are the driving force behind our success. Through our “Be The Hero” corporate volunteering program, we

foster employee engagement, enhancing both personal fulfillment and workplace culture. Our unwavering commitment to health, safety, and operational excellence is underscored by our industry certifications and accolades.

Sustainability is not merely a trend at Principia; it is the cornerstone of our business strategy.

This inaugural report reflects our ongoing commitment to transparency and accountability as we work to build a cleaner, more sustainable energy future for all. We are proud of the progress we made in 2024 and remain steadfast in our dedication to leading Greece’s energy transition.

Sincerely,

Aristotelis Chantavas
CEO of Principia

HIGHLIGHTS

AT A GLANCE

124 Million Euros Revenue
in Energy Sector

95 MW added in 2024
- total 577 MW of
installed capacity

1133 GWh of Renewable
Energy Produced in 2024



ENVIRONMENTAL

19

GHG emissions intensity,
location-based rate

5

water intensity



SOCIAL

137

People

0

recordable work-related
accidents for own
workforce



GOVERNANCE

0

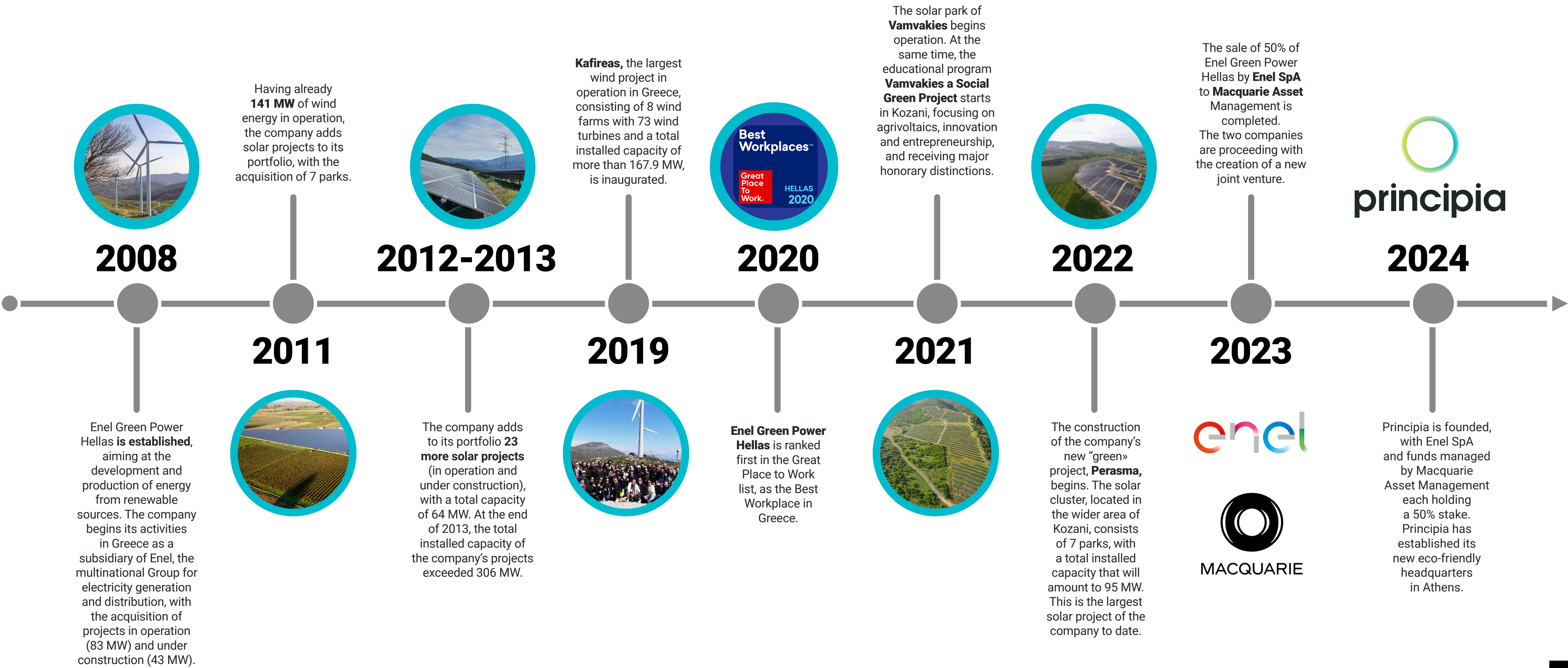
incidents of discrimination,
fines and penalties

0

convictions for violation of
anti-corruption and
anti-bribery laws

GROUP HISTORY

Timeline



PARTICIPATION AND AWARDS



Throughout 2024, Principia received several prestigious awards, recognizing its commitment to excellence in internal communications, employee engagement, health and safety, sustainability, and corporate responsibility.



Gold Award for Internal Communications & Employee Engagement

at the PR Awards 2024 (March 28, 2024), organized by BOUSSIAS, for the corporate volunteering program “Be The Hero” [\(link\)](#).

Principia’s commitment to social responsibility is exemplified through the award-winning corporate volunteering program «Be the Hero,» which fosters employee engagement and meaningful community support. Since its launch in September 2022, the program has actively contributed to local communities and the environment through initiatives aimed at supporting organizations and people in need. and underscores the dedication to creating a positive social impact, empowering employees to engage in purposeful volunteering, and reinforcing our core values of solidarity and contribution.

Winner in the Renewable Energy Sources Company category

at the Health & Safety Awards 2024 (June 6, 2024), organized by BOUSSIAS, recognizing the achievement of 400,000 work hours without accidents at Perasma [\(link\)](#).

Safeguarding the health and safety of employees and partners is a core priority for Principia, exemplified by the award-winning Health and Safety program implemented at the «Perasma» solar park in Kozani. Through rigorous safety protocols, continuous training, daily inspections, and employee incentive programs, we successfully achieved over 400,000 man-hours without accidents. Recognized as the «WINNER» in the «Renewable Energy Sources» category at the 2024 Health and Safety Awards, this achievement underscores our unwavering commitment to sustainability and workplace safety.

Silver Award for Best Volunteering Program

at the Internal Comms & Employee Engagement 2024 event (June 13, 2024), organized by BOUSSIAS, for the corporate volunteering program “Be The Hero” [\(link\)](#).

Principia’s corporate volunteering program, «Be the Hero,» continued to receive recognition for its meaningful impact, earning the Silver Award for «Best Employee Volunteer Communication Program» at the 2024 Internal Communication & Employee Engagement Awards. This distinction followed the Gold Award at the 2024 PR Awards, further highlighting the program’s success in fostering social responsibility among employees.

Gold Award and Distinction in the “Environment” Pillar

at the CR Index (July 3, 2024), organized by the Corporate Responsibility Institute, acknowledging the company’s strong ESG performance [\(link\)](#).

Principia’s dedication to Sustainable Development and ESG excellence was recognized with the Gold Award at the National CR Index, marking the first time a green energy company in Greece has achieved this distinction. This honor, accompanied by a special commendation in the «Environment» pillar, reaffirmed the company’s commitment to responsible business practices that create shared value for society, the environment, and our employees. Through initiatives such as combating energy poverty, supporting biodiversity conservation, promoting circular economy projects, and fostering workplace inclusion and safety, the company ensures the integration of sustainability across all aspects of its operations. This recognition underscored the company’s long-term vision of driving positive change and setting new standards in the renewable energy sector.



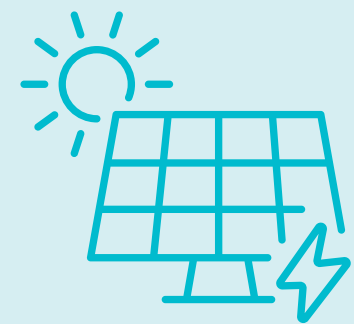
Silver Award for Best Employee Engagement Initiative

at the HR Awards 2024 (November 13, 2024), organized by BOUSSIAS, for the company’s rebranding initiative [\(link\)](#).

Principia’s rebranding was not just a visual transformation but a collective journey that strengthened corporate culture and employee engagement. Recognized with the Silver Award for «Best Employee Engagement Initiative» at the 2024 HR Awards, its holistic internal communication approach ensured dynamic employee participation at every stage of change. Through the establishment of a Rebranding Committee, qualitative research, and an engaging internal campaign, anticipation and unity were fostered thoroughly, culminating in a launch event that marked a new chapter for our company. This distinction highlights Principia’s commitment to an inclusive corporate culture that empowers employees and reinforces our shared vision for the future.



CERTIFICATES



As part of its commitment to operational excellence, compliance, and sustainability, Principia has obtained internationally recognized certifications for its management systems. These certifications demonstrate adherence to best practices in quality, environmental responsibility, occupational health and safety, and anti-bribery measures.

The certifications obtained include:

ISO 37001

Anti-Bribery Management System:

Ensures the implementation of robust measures to prevent, detect, and address bribery within the organization.



ISO 45001

Occupational Health and Safety Management System:

Demonstrates the Group's focus on providing a safe and healthy working environment.



ISO 14001

Environmental Management System:

Recognizes the Group's commitment to environmental sustainability and responsible resource management.



ISO 9001

Quality Management System:

Certifies the Group's ability to consistently deliver high-quality products and services that meet customer and regulatory requirements.



ESRS 2



 **principia**

General disclosures

ABOUT THIS REPORT ^[BP-1]

Scope against the financial statements

Principia's Sustainability Statement 2024 marks an important milestone as the company's inaugural sustainability report since its rebranding this year. Voluntarily prepared in alignment with the European Sustainability Reporting Standards (ESRS), this report signifies a formal commitment to transparency, accountability, and sustainability performance, providing stakeholders with insights into the company's environmental, social, and governance (ESG) efforts and impacts during its initial operational phase. Through the incorporation of international standards and the use of technologically advanced data collection and analysis systems, the validity and completeness of the data included is ensured. The scope of the Sustainability Report is aligned with that of the Company's Annual Report, and the same applies to the reporting period of the information.¹ **[BP-1 5 b(i)]**

Consolidation

The Sustainability Report covers all the Company's business operations (upstream, own operations, downstream) across the value chain, as well as all its subsidiaries. Principia considers the environmental, social and governance impacts of suppliers, contractors and other stakeholders involved in the production and supply of goods and services, as well as the provision of services by the Company. **[BP-1 5 b(ii)] [BP-1 5 c, AR 1]**

ADDITIONAL INFORMATION ^[BP-2]

Time horizons

In the Sustainability Statement 2024, Principia adopts a multi-dimensional time horizon as defined by the ESRS guidelines. Specifically, the analysis of the Company's performance is based on three time-horizons:

- **Short-term:** which covers a period of less than one year and corresponds to the reporting period of the financial statements,
- **Medium-term:** which extends to a period of more than one year and up to five years, and,
- **Long-term,** which refers to a time horizon of more than five years. **[BP-2 9 a] [BP-2 9 b]**

Value chain metrics

We have conducted a thorough review of the metrics used for value chain data to assess whether estimates from indirect sources were required. Following this review, we confirm that no such estimates have been used in the reported data. For the time being all reported metrics are based on direct sources, but in future reporting periods the data will have to be updated to also include estimations, especially for Scope 3 emissions. **[BP-2 10 a] [BP-2 10 b] [BP-2 10 c]**

Measurement uncertainty, assumptions, and judgements

Principia has reviewed and confirmed that all quantitative indicators and monetary amounts disclosed in this report are based on reliable data and measurement methods. There are no amounts subject to a high level of measurement uncertainty. **[BP-2 11 a]**

Changes against last year

The Sustainability Statement 2024 is prepared in line with the European Sustainability Reporting Standards. Adjustment of comparative information for prior reporting periods is impracticable since this is the first Report of the Company since its foundation with Enel SpA and Macquarie Asset Management as major shareholders. **[BP-2 13 a] [BP-2 13 b] [BP-2 13 b, c]**

Incorporation by reference **[BP-2 16] (referenced in IRO-2)**

¹ The Sustainability Statement is presented separately from the Financial Statements. **[BP-1 5 a]**

GOVERNANCE

The role of Management

BoD members

The Board of Directors (BoD) includes members with extensive expertise in the energy sector and mergers and acquisitions (M&As). These members contribute valuable industry knowledge and bring decades of experience from their roles within Enel and Macquarie Group. Their background spans various geographic markets, including Europe, where they actively engaged in the energy industry¹. **[GOV-1 21 c, AR 5]**

In terms of sustainability matters, Principia delegates the management of impacts, risks, and opportunities to first-line management. Managers address these matters through internal meetings held at least once per week, ensuring consistent review and oversight. It is noteworthy that the Group applies dedicated policies and procedures to guide this process across all relevant sustainability matters. These policies apply across the organization, ensuring consistent governance and accountability.

Further to that, the Group exercises oversight of sustainability matters through eight specialized committees established by the Board of Directors. These committees oversee the Group’s policies, processes, and practices, ensuring alignment with strategic priorities.

¹ Principia does not maintain a formal workers' union body, so employees and other workers do not have designated representatives on the Board of Directors (BoD). The current governance structure focuses on strategic oversight through the Board, ensuring decisions align with the Group's operational and growth priorities. **[GOV-1 21 b]**

Each committee includes members of the BoD and specialized staff assigned by the shareholders. Regular meetings between committee members and department managers occur monthly, bimonthly or quarterly, depending on the committee’s function. **[GOV-1 22 a] [GOV-1 22 b, AR 3] [GOV-1 22 c, AR 4] [GOV-1 22 c(i)] [GOV-1 22 c(ii)] [GOV-1 22 c(iii)]**

Lastly, The People, Culture & Sustainability (PC&S) Committee oversees the Group’s sustainability-related targets and tracks progress. The Chief of PC&S reports to the CEO weekly to maintain strategic alignment, while the Head of Sustainability meets with the Chief of PC&S to review ongoing projects, strategy, and developments. The CEO provides the Board of Directors with a bi-monthly update on the Group’s operations, covering departmental performance, risks, projects, incidents, and achievements. Sustainability remains a key focus through the Annual Sustainability Plan (ASP), outlined in the PD PL 502 Sustainability Management Policy, which defines strategic priorities, annual targets, and initiatives. The ASP is approved alongside the Annual Business Plan by the Management Team, which includes the CEO, CFO, COO, CCO, and Chief of PC&S. Leadership evaluates progress through six-month and annual KPI reviews to identify areas needing remediation. Additionally, the CEO’s monthly updates ensure sustainability risks and opportunities are consistently integrated into decision-making. **[GOV-1 22 d] [GOV-1 23, AR 5] [GOV-1 23 a] [GOV-1 23 b]**

The table below presents the composition of the board, including the number of executive and non-executive members, as well as the percentage of independent board members for the year 2024:

Board composition	ESRS Indicator	Unit Indicator	2024
The number of board members	[GOV-1 21 a]	No.	6
The number of executive board members	[GOV-1 21 a]	No.	0
The number of non-executive members	[GOV-1 21 a]	No.	6
Percentage of independent board members	[GOV-1 21 e]	%	0

The table below presents data on board diversity for the year 2024:

Board diversity	ESRS Indicator	Unit Indicator	2024
Board’s gender diversity ratio	[GOV-1 21 d]	Rate	1,2
Percentage of male board members	[GOV-1 21 d]	%	83
Percentage of female board members	[GOV-1 21 d]	%	17

Sustainability governance [GOV-2]

We maintain regular communication and oversight of sustainability matters through meetings. The weekly “First-Line Meeting” gathers managers to address critical matters and make timely decisions. Additionally, first and second-level managers hold separate monthly meetings to align on material topics and ensure comprehensive reporting to the Board of Directors. On a bi-monthly basis, the Business Review Meeting, attended by shareholders, focuses on material impacts, risks, and opportunities. This meeting also evaluates investments and defines strategic next steps. Material factors directly shape the Group’s strategic planning, major transactions, and risk management, ensuring decisions align with long-term objectives.

Essentially the Business Review Meeting serves as the primary forum for assessing risks and opportunities, prioritizing investments, enabling informed decision-making and driving growth, initiatives while the weekly First-Line Meetings facilitate early issue detection and resolution. [GOV-2 26 a] [GOV-2 26 b] [GOV-2 26 c]

Sustainability-related performance in incentive schemes [GOV-3]

Incentive schemes

Principia integrates sustainability-related targets into its remuneration policy. For all permanent employees, 20% of the annual bonus is tied to safety and sustainability performance. Safety performance holds a 75% weight, based on achieving the annual frequency rate, while sustainability targets account for 25%, also requiring participation in mandatory training on the Sustainable Development Goals (SDGs). [GOV-3 29 AR 7] [GOV-3 29 a]

Principia assesses management performance based on specific sustainability-related targets. The CEO, management team, and first- and second-line managers must conduct at least one safety walk per year at operational sites, including solar, wind, and hydro parks. During these visits, managers identify potential hazards to prevent occupational accidents, contributing to the Group’s safety objectives. The safety walk counts for 5% of the business targets assigned to

heads and managers. Additionally, management must meet sustainability-related requirements, such as attending the mandatory SDG training sessions, which form part of their annual bonus criteria. [GOV-3 29 b] [GOV-3 29 c]

Top management carefully reviews and approves the terms of all incentive schemes to ensure they align with the Group’s strategic direction and performance objectives. After this initial review, top management submits the schemes for final approval to the shareholders, ensuring transparency and accountability in the decision-making process. By overseeing this two-stage process, top management retains control over the structure and effectiveness of the schemes while making necessary updates to address evolving Group priorities, performance benchmarks, and market conditions. [GOV-3 29 e]

The table below presents information on incentive schemes for the year 2024:

Incentive schemes	ESRS Indicator	Unit Indicator	2024
Percentage of variable remuneration dependent on sustainability-related targets and/or impacts	[GOV-1 21 d]	%	5

Statement on due diligence [GOV-4]

Principia embeds due diligence into its governance, strategy, and business model by identifying salient human rights risks within the supply chain to determine where to focus efforts and resources. This process involves consultations with affected stakeholders to ensure their perspectives are considered at all key steps.

Following the identification of risks, the Group assesses potential gaps in its processes and develops targeted improvement plans to address residual risks effectively. The following table highlights where the Group’s due diligence process is outlined in the sustainability statement, providing details on how the Group applies its key aspects and steps: **GOV-4 30, 32, AR 8, AR 9, AR 10]**

Core elements of due diligence	Sections in the sustainability statement
Embedding due diligence in governance, strategy, and business model	ESRS 2 General disclosures Governance The role of Management [GOV-1] ESRS 2 General disclosures Governance Sustainability governance [GOV-2]
Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 General disclosures Strategy Stakeholder engagement [SBM-2] Employees [S1] Impact, risk and opportunity management Processes for engaging with employees [S1-2]
Identifying and assessing adverse impacts	ESRS 2 General disclosures Impact, risk and opportunity management Processes to identify and assess material impacts, risks and opportunities [IRO-1]
Taking actions to address those adverse impacts	Climate change [E1] Impact, risk and opportunity management Actions [E1-3] Pollution [E2] Impact, risk and opportunity management Actions [E2-2] Biodiversity and ecosystems [E4] Impact, risk and opportunity management Actions [E4-3] Employees [S1] Impact, risk and opportunity management Actions [S1-4] Mitigation actions Affected communities [S3] Impact, risk and opportunity management Actions [S3-4]
Tracking the effectiveness of these efforts and communicating	Climate change [E1] Impact, risk and opportunity management Actions [E1-3] Pollution [E2] Impact, risk and opportunity management Actions [E2-2] Biodiversity and ecosystems [E4] Impact, risk and opportunity management Actions [E4-3] Employees [S1] Impact, risk and opportunity management Actions [S1-4] Mitigation actions Affected communities [S3] Impact, risk and opportunity management Actions [S3-4]

Risk management and internal controls over sustainability reporting^[GOV-5]

Although Principia currently does not have a dedicated Internal Control and Risk Management System specifically to sustainability reporting, it implements risk management and internal control processes through structured practices and systems. As a result, the Group uses the following key practices: **[GOV-5 36 a, AR 11]**

- **Risk management practices:**

The Group identifies, evaluates, and manages sustainability-related risks as part of its governance framework.

- **Control environment:**

Ethical values and operational standards are embedded across the Group to ensure integrity and accountability in sustainability reporting.

- **Monitoring and continuous improvement:**

Periodic reviews validate the effectiveness of controls and risk strategies, ensuring the accuracy and reliability of sustainability data.

- **Compliance programs:**

The Code of Ethics, Zero Tolerance of Corruption Plan, and Human Rights Policy reinforce the Group's commitment to ethical practices.

Principia takes a comprehensive approach to risk assessment, focusing on the key steps of identifying, evaluating, and prioritizing all material risks, including both financial and non-financial risks. The Double Materiality process plays a central role in analyzing and assessing risks, ensuring that risks with significant financial or sustainability impacts are carefully examined.

Although, risk assessment is not described in a formal process, the Group prioritizes risks based on their potential impact and likelihood of occurrence. Risk impact is evaluated against various pillars, such as alignment with strategic targets and reputational considerations. Likelihood is assessed by using historical trends and emerging factors, helping the Group gauge the probability of risks materializing. Once risks are prioritized, Principia develops response plans for each identified risk. These plans include mitigation strategies, existing controls, and timelines for further action, and they aim to ensure the alignment with sustainability objectives and broader company goals. **[GOV-5 36 b, AR 11]**

As the Group's planned Operational Risk Management System will be fully implemented by 2025, it will provide a more structured framework for systematically integrating risk assessment findings into its processes. **[GOV-5 36 d, AR 11]**

Finally, the Group reports findings from its risk management and internal control processes to management through its established governance practices. Discussions on identified risks, including those related to sustainability reporting, take place during strategic planning sessions, the formulation of the annual business plan, and investment reviews. These meetings provide a platform for addressing key risks and their potential impact on the Group's objectives while ensuring alignment with its strategic priorities.

The significant risks are escalated to the CEO and the BoD as they arise. This ad hoc reporting approach allows management to respond swiftly to critical issues, ensuring that appropriate actions are taken to mitigate risks and support decision-making. **[GOV-5 36 e]**

Risk catalogue

In the context of sustainability reporting, the Group has identified key risks that could impact its ability to provide accurate and timely sustainability information, potentially affecting stakeholder expectations and strategic objectives. These risks include the following: **[GOV-5 36 c, AR 11]**

- **Delayed information submission:**

Challenges in meeting deadlines for internal and external sustainability reporting.

- **Data inconsistencies:** Issues arising from fragmented data ownership, leading to inaccurate or incomplete reports.

- **Regulatory compliance:**

Risk of non-compliance with evolving regulations such as the National Climate Law and Corporate Sustainability Reporting Directive - CSRD implementation.

- **Value chain data gaps:**

Difficulties in obtaining accurate data from the upstream and downstream value chain.

To address these risks, the Group employs the following mitigation strategies:

- **Data governance improvements:**

Conducting regular audits and validations to enhance data accuracy.

- **Integrated reporting systems:**

Aligning financial and non-financial reporting for consistency and transparency.

- **Expertise development:**

Providing training and allocating resources to strengthen sustainability reporting capabilities.

Principia integrates findings from its risk assessment process into its internal functions and operational processes, though its approach remains in development. While not yet fully formalized as mentioned above, the Group ensures that identified risks, including those related to sustainability reporting, are thoroughly discussed during key phases such as strategic planning and investment decision-making.

At present, the Group primarily incorporates these findings through:

- **Basic risk management actions:**

Addressing key risks by developing ad hoc mitigation strategies and reinforcing existing controls.

- **Focused discussions:**

Engaging management and operational teams during strategic and operational planning to ensure risk considerations inform decision-making.

STRATEGY

Business model and value chain [SBM-1]

Principia operates exclusively within the Energy Sector and focuses on renewable energy assets such as wind, solar PV, small hydro, as well as other clean energy solutions. As one of the largest energy companies in Greece dedicated solely to renewables, the Group leads efforts to advance clean electricity generation and energy transition. In 2024, the Group further expanded its portfolio by investing in its first battery energy storage system (BESS), and therefore marked a significant milestone in enhancing energy storage capacity and grid flexibility. The Group performs duties for diverse markets in Greece , and provides services to key stakeholders such as energy operators, large-scale energy buyers, and businesses with significant electricity requirements. **[SBM-1 40 a(i), AR 12, AR 13] [SBM-1 40 a(ii), AR 12, AR 13]**

Last but not least, Principia operates exclusively within the renewable energy sector, and does not offer any products or services that are banned or restricted in any market. **[SBM-1 40 a(iv), AR 12, AR 13]**

Principia's upstream value chain encompasses equipment, materials, services, and contractors essential for developing and maintaining renewable energy projects. The supply chain extends across multiple sectors, involving both large multinational corporations and small local businesses. As the Group's main suppliers are located in Europe and China, Principia prioritizes collaboration with local contractors and service providers in the regions where it operates. This approach supports local economies and ensures cost-effective, high-quality project implementation. Principia maintains strong relationships with specialized contractors and suppliers, ensuring the timely delivery of materials and services and adhering to stringent quality standards. Moving forward, the Group aims to develop a holistic responsible sourcing strategy, incorporating environmental, social, and governance (ESG) criteria into supplier assessments and procurement processes. **[SBM-1 42, AR 14]**



INPUTS

As a primary input, Principia utilizes the Earth's natural resources, including solar, wind, and water, for its clean energy projects. Additionally, with 137 employees across headquarters and regional offices in Karystos, Patras, and Kozani, operational excellence is immediately linked with its workforce. The Group promotes a culture of «Safety First» as the well-being of every employee is the biggest priority and provides opportunities for leadership development through training programs. Finally, in terms of financial strength, the Group benefits from a strong balance sheet, supported by committed shareholders who also share a bold vision of growth. The excellent relationships with financial institutions, which play a pivotal role to secure funds for current operations and future expansion, are another important factor for the economic prosperity of the Group.



HOW WE ADD VALUE

The Group adds value by leveraging its extensive expertise and infrastructure to develop, construct, and operate renewable energy and storage projects. We focus on high-quality projects across technologies, including wind, solar, small-hydro, and battery energy storage systems (BESS). Additionally, we explore the use of hybrid renewable generation and storage plants to further enhance our operational efficiency. Moreover, with a geographically dispersed and diversified project pipeline amounting to approximately 5.5 GW, the Group ensures resilience and adaptability in an evolving energy market. Operational excellence and top safety performance underline the Group's ability to deliver consistent results. Principia does not provide services to retail customers but rather distributes electricity and flexibility services to key market players such as the Hellenic Energy Exchange, the Operator of Renewable Energy Sources and Guarantees of Origin, private companies requiring green energy solutions, and the Independent Power Transmission Operator.

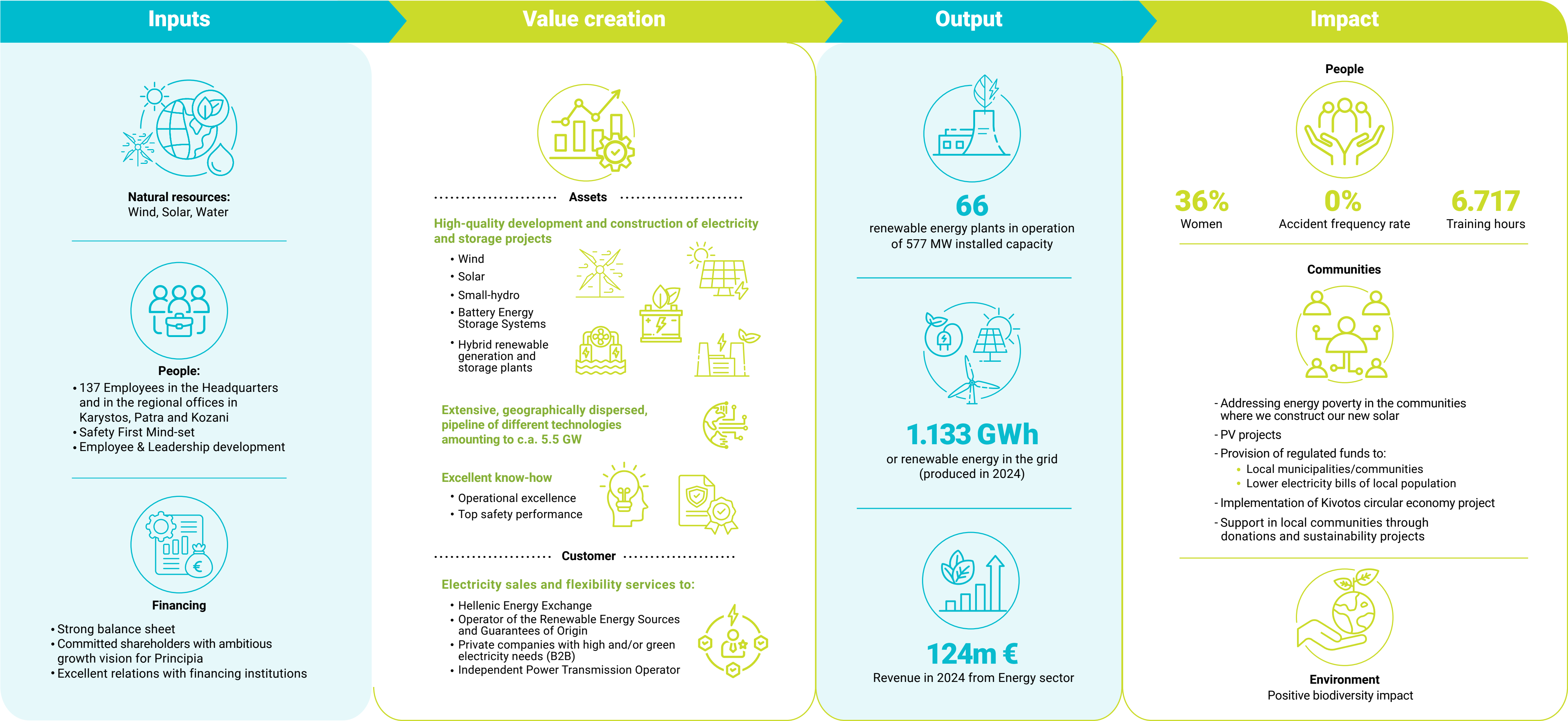


OUTPUT AND IMPACT

Principia's outputs reflect its commitment to renewable energy generation and sustainable growth. The Group currently operates 66 renewable energy plants with a total installed capacity of 577MW. These efforts generate approximately 1.133 GWh of renewable energy contributing significantly to clean electricity supply. Beyond energy production, Principia creates a positive impact across people, communities, the environment, and the economy. It prioritizes workforce safety by achieving a 0% accident frequency rate and supports professional growth of its employees through targeted training programs. In local communities, Principia's addresses energy poverty through the funding of initiatives that reduce electricity costs and through the implementations of circular economy projects, such as the Kivotos initiative. Finally, to address environmental concerns, the Group drives CO2 emission reductions, abolishes polluting energy activities like lignite extraction, and promotes the adoption of clean electricity in sectors such as heating and transportation. **[SBM-1 42, AR 14] [SBM-1 42 a] [SBM-1 42 b] [SBM-1 42 c, AR 15]**



Business model description [SBM-1]



Revenue and significant sectors

All products and services align with sustainability principles – there are no operations involving fossil fuels or other restricted sectors such as production of chemicals, controversial weapons, or tobacco cultivation. Additionally, through its activities in significant ESRS sectors, the Group fosters material impacts such as energy security enhancement, energy poverty reduction, as well as local community support and development. **[SBM-1 40 c, AR 12, AR 13] [SBM-1 40 d(i), AR 12, AR 13] [SBM-1 40 d(ii), AR 12, AR 13] [SBM-1 40 d(iii), AR 12, AR 13] [SBM-1 40 d(iv), AR 12, AR 13]**

Sustainability strategy

The Group assesses its energy solutions’ sustainability performance against decarbonization goals and ensures that each project contributes to the reduction of carbon emissions and addresses climate impacts. The pillar of our sustainability strategy is dedicated to our mission to drive the energy transition through innovative solutions. The Group takes bold steps to pioneer renewable energy projects that promote a more clean and more sustainable future. Innovation guides our approach as we develop solutions that accelerate the shift to renewable energy, the reduction of carbon emissions and the achievement of global decarbonization goals.

In addition to the promotion of clean energy, the Group highly values the prosperity of local communities. We believe that a better future cannot exist without shared value. By focusing on local development, we address challenges like energy access and economic growth in the regions where we operate. Our projects aim to deliver benefits such as lower energy costs, infrastructure improvements, and initiatives that enhance community well-being.

As we move forward, we remain committed to balancing progress with responsibility. While challenges such as market volatility, resource availability, and economic uncertainties persist, we view them as opportunities to innovate further and strengthen our impact. **[SBM-1 40 e, AR 12, AR 13] [SBM-1 40 f, AR 12, AR 13]**

Challenges and future projects

Principia operates in a dynamic and challenging market environment, navigating through uncertainties in electricity prices, regulatory policies, and grid availability. Market volatility, supply chain disruptions, and rising equipment costs pose additional challenges, compounded by macroeconomic factors such as inflation, interest rates, and currency fluctuations. Principia updates regularly its business plan, maintaining a flexible approach that is continuously adapted to take into account the above-mentioned risks along with the evolving regulatory landscape. Additionally, Principia focuses on climate change mitigation and adaptation - it measures and validates Scope 1, 2, and 3 emissions, and sets clear targets for net-zero emissions. Furthermore, the Group prioritizes the development of a sustainable supply chain, integrating ESG considerations into procurement processes and supplier evaluations. Lastly, future initiatives include the enhancement of grid integration, the expansion of renewable energy projects, and fostering innovation in energy storage solutions. On the societal front, Principia remains committed to supporting its employees, local communities, and broader stakeholders, ensuring that its projects deliver long-term economic and social benefits. **[SBM-1 40 g, AR 12, AR 13]**

The table below outlines the Group’s value chain phases and key activities across upstream, Own operations, and downstream operations:

Core upstream activities		
Supply chain	Suppliers	Ensures sourcing of raw materials, components, and services vital for energy production and operational continuity.
	Insurance providers	Offers risk management solutions to protect operations, assets, and projects from financial and operational uncertainties.

Own operations			
 WIND ENERGY	Wind energy production	Harnesses wind resources to generate renewable energy, contributing to clean energy supply and decarbonization goals.	
 SOLAR ENERGY	Solar energy production	Converts solar radiation into energy through photovoltaic systems, reducing reliance on fossil fuels.	
 HYDRO-ELECTRIC ENERGY	Hydroelectric power production	Utilizes water flow for renewable energy generation, ensuring reliable and sustainable power supply.	
 TRADING	Power purchase agreements	Facilitates energy procurement and long-term contracts to optimize supply-demand balance and ensure cost efficiency.	

Core downstream activities		
Energy transmission network	Distribution of energy	Transports energy through transmission grids to ensure stable delivery to industrial, commercial, and residential end-users.
Energy market	Clients ⁴	Serves businesses and large-scale consumers with tailored energy solutions for operational efficiency and sustainability.
	Consumers	Provides households and small users with energy services, enabling access to affordable, clean, and reliable power.

⁴ Our clients and customers are considered indirect because we do not maintain a direct, one-on-one relationship with them, nor do we directly provide them with the product. Instead, the product, namely electricity, is delivered to the end-users through intermediary entities, specifically energy supplier companies, which act as the primary channel for offering the product.

The table below presents key data related to the Group’s strategy and business model for the year 2024, including the number of employees in different locations, total revenue, and revenue breakdown by significant sectors:

Strategy and business model	ESRS Indicator	Unit Indicator	2024
Employees in Greece ⁵	[SBM-1 40 a(iii), AR 12, AR 13]	No.	137
Total revenue	[SBM-1 40 b, AR 12, AR 13]	Million €	124
Revenue in significant sector breakdown	[SBM-1 40 b, AR 12, AR 13]	Million €	124

⁵ The total number of employees is presented. To be mentioned that one (1) employee is based in South Africa.

STAKEHOLDER ENGAGEMENT [SBM-2]

General approach⁶

Principia identifies its stakeholders as individuals and entities with direct or indirect ties to its activities and decision-making processes, including those who influence or are influenced by our operations. Our commitment is to maintain ongoing, meaningful, and reciprocal engagement with all stakeholder Groups to align with their needs and expectations. Building relationships rooted in trust and mutual respect is integral to our sustainable development strategy and aligned with our commitment to transparency and accountability.

The stakeholder engagement methodology was centered on an online survey designed to assess the priority of various sustainability matters. Stakeholders were asked to rank material topics, ensuring their perspectives were incorporated into the Group's sustainability strategy. This online format facilitated broad participation and enabled easy analysis of results, ensuring a diverse and representative understanding of stakeholder priorities. The survey proved particularly effective in engaging stakeholders from various operations (internal or external), providing actionable insights into what they value most.

The material topics addressed in the survey included critical thematic areas (see below) such as climate

change, which has a significant impact on both the Group's operations and its broader environmental responsibilities. Stakeholders provided input on priorities such as reducing greenhouse gas emissions, increasing energy efficiency, and transitioning to more sustainable practices across the value chain. Similarly, topics related to the Group's workforce—such as health and safety, diversity and inclusion, training, and career development—were highlighted as essential to building a resilient and thriving organization. The insights gained from stakeholders reinforced the importance of these topics in shaping the Group's strategic sustainability framework. **[SBM-2 45 a, AR 16] [SBM-2 45 a(ii), AR 16] [SBM-2 45 a(iii), AR 16] [SBM-2 45 a(iv), AR 16] [SBM-2 45 a(v), AR 16]**

To complement the online survey, specific communication channels were maintained to engage directly with key stakeholder Groups. For employees, internal platforms such as intranet-based communication lines and dedicated feedback portals ensured information exchange and allowed the workforce to voice concerns or provide input on sustainability priorities, including workforce development and well-being. Similarly, for affected communities, targeted outreach mechanisms such as open communication with local communities' representatives provided a direct avenue for

engagement, ensuring that their unique perspectives and needs were captured.

Specifically, for internal stakeholders such as employees, Principia conducts more than two internal surveys annually and utilizes an observation and insights tool to gather recommendations, concerns, and feedback. Additional mechanisms include one-on-one meetings with managers and HR, ensuring a continuous dialogue that informs strategy adjustments. The feedback collected from employees directly influences the Group's strategy and departmental KPIs, fostering a responsive and adaptive organizational culture.

For local communities and environmental considerations, the Group employs a comprehensive approach, including social, environmental, and economic context analyses in new development areas, as well as environmental impact assessments for new projects. Consultations with local communities and NGOs are integral to the process, supported by dedicated personnel who act as primary points of contact in regions where Principia constructs and operates its assets. Feedback from these stakeholders informs action plans tailored to individual projects or assets, emphasizing shared value creation, financial support, and donations.

Additionally, the Group aligns its strategy with broader societal interests through active participation in industry associations, such as the Hellenic Wind Energy Association (HWEA), and by contributing to public consultations and recommendations. In select cases, company representatives hold leadership roles within these associations, enabling a strategic influence on industry standards and practices. **[SBM-2 45 b, AR 16] [SBM-2 45 c] [SBM-2 45 d]**

Principia is committed to enhancing its stakeholder engagement strategy and is actively planning further steps to refine its approach for each stakeholder Group. This includes continuously improving its engagement plans, tailoring strategies to better address the specific needs, expectations, and interests of diverse stakeholders. Principia aims to foster stronger, more meaningful relationships and ensure that stakeholder feedback effectively informs decision-making processes by adopting a more focused and systematic approach.

⁶ Individual approaches per stakeholder group will be analyzed in respective chapters.

Connection to business model

A key component of Principia’s future engagement efforts involves the establishment of a responsible sourcing strategy. This initiative will place a particular emphasis on strengthening engagement with suppliers and create a more collaborative and transparent relationship. The Group seeks to align its supply chain operations with its broader sustainability goals by prioritizing responsible sourcing practices. These planned steps are expected to evolve over the coming years and contribute to a more dynamic and mutually beneficial relationship with all stakeholders. **[SBM-2 45 c(i), c(ii)]**



Stakeholder Groups

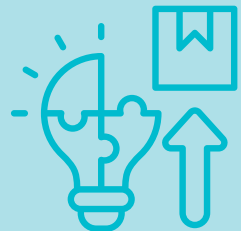
The table below details the categories of stakeholders identified by Principia Group. **[SBM-2 45 a(i), AR 16]**



Stakeholder engagement table	Survey answers	Communication channels	Times engaged in RY
 Employees	86	Intranet	Numerous
 End-users	3	Stakeholder engagement survey	1
 Shareholders and Investors	8	Monthly meetings, quarterly committees' meetings	More than 12
 Suppliers and contractors	16	Meetings	Numerous
 Capital providers	3	Meetings	Twice per provider
 Affected communities	5	Emails / meeting	More than 5
 Regulatory authorities and Associations	2	Ad hoc meetings in conferences	More than 5
 Peers and competitors	0	Ad hoc meetings in conferences	N/A

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES [SBM-3]

Material impacts

MATERIAL IMPACTS			
ESRS Topic	Impact description	Type	Location in VC
 E1. Climate change	Climate change adaptation Principia has implemented measures to address extreme weather events, enhancing disaster preparedness and reducing environmental and societal harm. These efforts, which may require structural adjustments to stay practical and reflective of the company's evolving condition, aim to ensure operational resilience while safeguarding communities and ecosystems.	Positive, actual	Own operations, Downstream
	Climate change adaptation Principia, due to its operations in the renewables industry, may face significant climate risks from extreme weather events, potentially leading to disruptions in biodiversity, ecosystems, and broader environmental consequences.	Negative, potential	Own operations
	Climate change mitigation By 2025, Principia plans to establish measurable environmental targets to reach net zero emissions. Such targets aim to reduce GHG emissions and contribute to global efforts in mitigating climate change.	Positive, potential	Upstream, Downstream, Beyond the value chain
	Climate change mitigation Principia is presently using manual methods to primarily monitor Scope 1 and Scope 2 emissions, with plans to introduce an official data collection procedure and tool by the end of the year. This might lead to reduced air pollution and protection of the atmosphere and public health.	Positive, actual	Own operations, Downstream
	Climate change mitigation Principia has a minimal contribution to Scope 1 emissions mainly through its company cars but has a more significant impact on Scope 3 emissions due to its own operations. This may lead to increased greenhouse gas concentrations, air quality degradation, and exacerbated global climate challenges.	Negative, actual	Own operations
	Energy Principia consumes energy, mainly in the form of electrical power which contributes to greenhouse gas emissions and influences air quality and global climate efforts.	Negative, actual	Own operations
 E4. Biodiversity and ecosystems	Impacts and dependencies on ecosystem services The selection of each new park location is handled by the Project Development department, which conducts specialized studies focusing on biodiversity. These studies primarily assess habitats, resource utilization, and Natura areas leading to preservation and protection of habitats.	Positive, actual	Upstream, Beyond the value chain
	Impacts on the extent and condition of ecosystems When projects are located within protected areas, Special Ecological Studies must be conducted, incorporating strict measures such as environmental and ornithological monitoring programs and bird collision avoidance systems to eliminate potential environmental degradation, thereby enhancing ecosystem integrity and preserving biodiversity richness in adjacent areas.	Positive, actual	Own operations
	Impacts on the extent and condition of ecosystems During the Environmental Impact Assessment phase, if the forestry authority mandates restoration, these cases are documented, with risks identified early on, and while interventions in forest areas are outlined in the studies, specific reforestation plans are developed afterward, ensuring sustainable land use and preemptive management of environmental concerns.	Positive, actual	Upstream
	Impacts on the extent and condition of ecosystems Company operations inherently risk degrading surrounding ecosystems or harming protected areas which might disrupt natural habitats and ecosystem services.	Negative, actual	Own operations





ESRS Topic	Impact description	Type	Location in VC
 G1. Business conduct	Corruption and bribery Principia has implemented an anti-corruption and anti-bribery policy, maintained a detailed risk registry, and reported no incidents for 2024, with oversight provided by an Anti-bribery Committee in line with ISO standards championing fair competition and economic growth, and ensuring trust in the market, partners, and regulators.	Positive, actual	Own operations
	Corruption and bribery Principia may experience a corruption and bribery risk which can take place in several locations within its chain of operations and may result in market distortions and reduced economic performance within the sectors affected by such practices.	Negative, potential	Own operations
	Management of relationships with suppliers including payment practices Principia has asked all Greek contractors with active contracts to document their sustainability footprint and is developing a structured procedure for evaluating suppliers, including social evaluation, human rights, and anti-slavery standards. They aim to establish minimum requirements for their suppliers, adhering to broader environmental and social standards throughout the supply chain.	Positive, actual	Own operations
	Protection of whistle-blowers Principia has established a whistleblowing system and introduced a whistleblowing link accessible to internal and external parties and provides new employees with whistleblowing information during onboarding fostering a culture of transparency and accountability.	Positive, actual	Own operations
 S1. Own workforce	Working conditions Principia's operations involve inherent health and safety risks associated with the setup and management of renewable energy equipment, something that may lead to potential safety incidents and health hazards.	Negative, actual	Own operations
	Working conditions Principia ensures that all employees receive adequate wages and have access to comprehensive health and life insurance plans, as well as standard parental leave as mandated by the law. Employees are fully informed about their benefits during onboarding, and soon these details will be available electronically. The above result in employee well-being and social equity as well as an informed and empowered workforce.	Positive, actual	Own operations
	Working conditions Principia created a grievance mechanism, which enables a culture of transparency and accountability and an equitable work environment. The communication channel, which is found Principia's website, is accessible to both internal and external stakeholders.	Positive, potential	Own operations

Material risks and opportunities

MATERIAL RISKS AND OPPORTUNITIES		
ESRS Topic	Description	Type
 E1. Climate change	Climate change adaptation Principia has measures in place for extreme weather events, enhancing operational and financial stability through lower recovery costs and increasing investor confidence.	Opportunity
	Climate change adaptation Principia may be experiencing a severe climate risk in terms of extreme weather events, due to its nature of operations in the renewables industry leading to increased insurance costs, operational disruptions, and potential damage to physical assets.	Risk
	Climate change mitigation By 2025, Principia plans to establish measurable environmental targets to reach net zero emissions, a plan that is connected to operational efficiency and innovation, potentially leading to cost savings and enhanced competitiveness as well as attraction of environmentally conscious investors and stakeholders.	Opportunity
	Climate change mitigation Principia is presently using manual methods to primarily monitor Scope 1 and Scope 2 emissions, with plans to introduce an official data collection procedure and tool by the end of the year. This practice will achieve cost savings through improved efficiency and accuracy and potentially enhance the Company's appeal to environmentally conscious investors and partners.	Opportunity
	Climate change mitigation Principia has a minimal contribution to Scope 1 emissions through its company cars but has a more significant impact on Scope 3 emissions due to its own operations, which might lead to increased regulatory scrutiny and carbon-related expenses as well as further investments in sustainability initiatives.	Risk
 E2. Pollution	Pollution of soil Principia has measures in place for extreme weather events, enhancing operational and financial stability through lower recovery costs and increasing investor confidence.	Opportunity
	Pollution of soil Company operations inherently carry the risk of causing soil pollution or degradation, during set-up or management of equipment and parks which poses the risk of regulatory fines and remediation costs, increasing operational expenses and harming the company's reputation, potentially leading to decreased market trust.	Risk
	Pollution of water Once a year, a comprehensive water quality assessment is conducted, both prior to and following the water's entry into the system, and according to ETA terms. This practice aids in the prevention of regulatory fines and costly environmental damage by ensuring compliance with water quality standards.	Opportunity
 E4. Biodiversity and ecosystems	Impacts and dependencies on ecosystem services The selection of each new plant location is handled by the Project Development department, which conducts specialized studies focusing on biodiversity. These studies primarily assess habitats, resource utilization, and Natura areas to ensure environmental conservation and sustainability, mitigating potential costs related to environmental damage and regulatory non-compliance.	Opportunity
	Impacts on the extent and condition of ecosystems Company operations inherently risk degrading surrounding ecosystems or harming protected areas, increasing regulatory scrutiny and potential fines, potentially affecting market perception and potentially increasing operational costs.	Risk
 ESRS 2. General disclosures	Governance Principia is actively engaged in risk mapping for its renewable energy projects, identifying potential risks across all stages of the project lifecycle. By implementing a comprehensive risk management approach, Principia enhances enterprise value through improved project outcomes and minimizes the likelihood of costly disruptions, while also boosting investor confidence by demonstrating a commitment to robust risk management practices.	Opportunity
	Strategy and business model Principia is updating its business plan, maintaining a flexible approach that is continuously adapted to align with the evolving regulatory landscape, improving the Company's competitive position and reputation. This leads to potential financial benefits through enhanced stakeholder trust and operational efficiency.	Opportunity



ESRS Topic	Description	Type
 G1. Business conduct	Corruption and bribery Principia has implemented an anti-corruption and anti-bribery policy, maintained a detailed risk registry, and reported no incidents for 2024, with oversight provided by an Anti-bribery Committee in line with ISO standards. This may lead to Reducing the risk of legal penalties, protecting its reputation, and enhancing investor confidence.	Opportunity
	Corruption and bribery Principia may experience a corruption and bribery risk which can take place in several locations within its chain of operations, potentially increasing costs related to compliance, legal defenses, and fines.	Risk
	Management of relationships with suppliers including payment practices Principia has asked all Greek contractors with active contracts to document their sustainability footprint and is developing a structured procedure for evaluating suppliers, including social evaluation, human rights, and anti-slavery standards. They aim to establish minimum requirements for their suppliers. A more responsible and resilient supply chain can lead to improved operational efficiency, reduced risk, and increased trust from stakeholders and investors.	Opportunity
	Political engagement At the CEO level, there is active communication with local and EU regulators to secure corporate development and adaptability, with lobbying being an integral part of the company's strategy. This practice facilitates project approvals, reduced bureaucratic delays, and subsequent compliance.	Opportunity
 S1. Own operations	Equal treatment and opportunities for all Principia has established a Violence and Harassment policy that is included in the Company's Labor regulation. Such practices improve employee satisfaction, reduce legal risks, and strengthen corporate reputation.	Opportunity
	Equal treatment and opportunities for all Principia has established certain policies such as the Diversity and Inclusion Policy, Violence and Harassment Policy, Human Rights Policy, Teleworking Policy, and Code of Ethics, fostering a supportive and diverse workplace, which can improve employee satisfaction, attract talent, and boost organizational reputation.	Opportunity
	Equal treatment and opportunities for all Principia may face risks associated with insufficient diversity and potential discrimination incidents within its workforce and operational practices. These risks include unequal treatment of employees based on race, gender, or other characteristics, which could lead to a lack of diverse perspectives and lower overall employee satisfaction, resulting to significant legal expenses, compensation claims, and potential fines, potentially adding to additional costs related to training and policy changes.	Risk
	Working conditions Principia's operations involve inherent health and safety risks associated with the setup and management of renewable energy equipment that might lead to higher insurance premiums, compensation claims, and legal fees.	Risk
	Working conditions The Company has established a health and safety policy following the ISO 45001 certification and also a stop-the-work policy. All health and safety related matters and provisions apply both to immediate employees of Principia and to contractors' employees. The policy might help mitigate potential financial risks associated with workplace accidents, injuries, and legal liabilities, as well as improved employee productivity.	Opportunity
	Working conditions Principia ensures that all employees receive adequate wages and have access to comprehensive health and life insurance plans, as well as standard parental leave as mandated by the law. Employees are fully informed about their benefits during onboarding, and soon these details will be available electronically. Such actions help in attracting and retaining top talent, boosting employee morale and productivity, and increased employee satisfaction.	Opportunity
 S3. Affected communities	Communities' civil and political rights Principia has developed a procedure outlining stakeholder engagement and methods for assessing the needs of the local community. An annual CSV (Creating Shared Value) plan details the actions to be undertaken, alongside communication initiatives. This may help build stronger community relationships, improve corporate reputation, and foster trust and collaboration with key stakeholders.	Opportunity
	Communities' civil and political rights The operation of renewable energy facilities can lead to disturbances such as noise, visual impact, or altered landscapes, which may negatively affect the quality of life and well-being of nearby residents. Decreased community comfort may result in higher costs related to addressing grievances, potential regulatory compliance, and mitigation measures.	Risk
	Communities' economic, social and cultural rights When selecting areas for new projects, Principia makes concerted efforts to preserve the environment and enhance the communities in which they operate, including making donations and other contributions. This practice fosters community goodwill and strengthening the company's reputation.	Opportunity
	Communities' civil and political rights Principia introduced a procedure outlining stakeholder engagement and methods for assessing the needs of the local community. An annual CSV (Creating Shared Value) plan details the actions to be undertaken, alongside communication initiatives ensuring alignment with the needs and priorities of the local community.	Positive, potential
	Communities' civil and political rights The operation of renewable energy facilities can lead to disturbances such as noise, visual impact, or altered landscapes, which may negatively affect the quality of life and well-being of nearby residents, which leads to decreased satisfaction of the local community and potentially increased community opposition.	Negative, actual
	Communities' economic, social and cultural rights Personnel is hired from local communities, with contractors required to source at least 30-40% of their workforce locally, improving the company's social license to operate, and increased operational efficiency through a stable local workforce. Principia currently operates 66 projects, all within Greece	Opportunity

Stakeholder prioritization table



Stakeholder Group	Climate change mitigation	Climate change adaptation	Energy	Pollution of soil	Pollution of water	Impacts and dependencies on ecosystem services	Impacts on the extent and condition of ecosystems	Equal treatment and opportunities for all	Working conditions	Communities' civil and political rights	Communities' economic, social and cultural rights	Corruption and bribery	Management of relationships with suppliers including	Political engagement	Protection of whistle-blowers
Employees															
End-users															
Shareholders and Investors															
Suppliers and contractors															
Capital providers															
Affected communities ⁷															
Regulatory authorities and Associations ⁸															

Legend	Very important	Important	Not important
--------	----------------	-----------	---------------

⁷ Smaller sample size
⁸ Smaller sample size

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

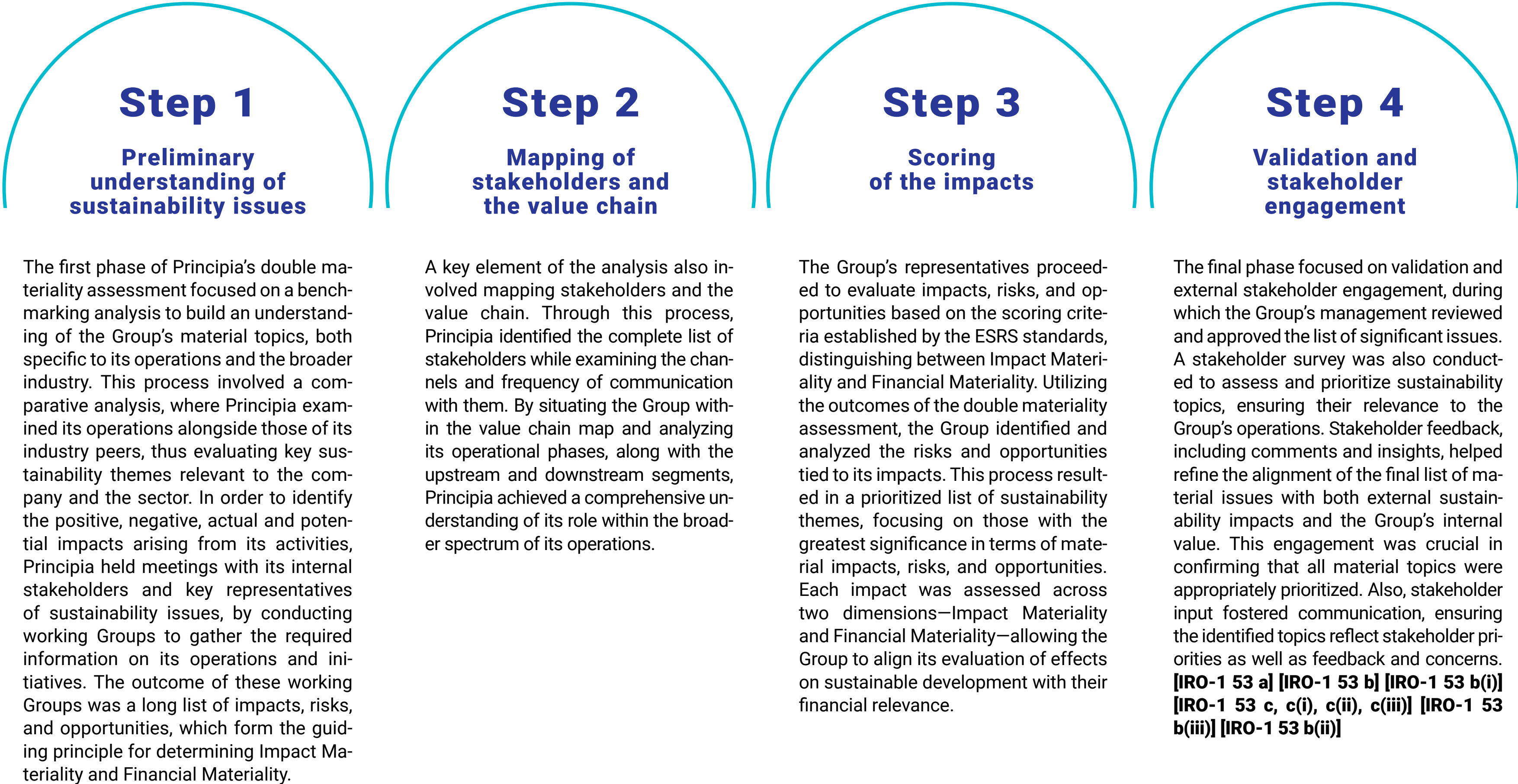
Processes to identify and assess material impacts, risks and opportunities [IRO-1]

Double Materiality Assessment Methodology

Principia conducted the double materiality assessment methodology to identify, review, and prioritize critical sustainability areas. This approach evaluated the Group’s sustainability impacts from two perspectives:

- **Impact materiality:** assessing how the Group’s activities affect society, governance, and the environment.
- **Financial materiality:** analyzing how sustainability issues influence the Group’s value creation and financial performance.

The double materiality assessment forms a cornerstone of Principia’s efforts to proactively address stakeholder expectations, adapt to evolving regulatory landscapes, and manage sustainability-related risks and opportunities.



Integration of DMA into the ERM

The financial materiality scores underwent a cross-department validation process led by the Sustainability department. The team reviewed the financial impacts of each identified risk or opportunity, ensuring their alignment with the Group's business objectives. Principia plans to introduce a procedure to integrate sustainability-related financial risks into Enterprise Risk Management (ERM). **[IRO-1 53 d] [IRO-1 53 f]**

Climate change - Identification of impacts, risks and opportunities [E1.IRO-1]

Identification of physical risks

The Group's impact on climate change is linked to its greenhouse gas (GHG) emissions, which arise from several sources. These include fuel consumption for vehicles, diesel generators at construction sites, and operational activities, though the emissions from the latter are considered negligible. Additional emissions stem from purchased electricity, primarily sourced from the grid to power offices, including electric vehicle operations, and to support assets such as wind, solar, and hydro parks. While emissions from the supply chain have not yet been measured, this area represents a potential focus for future assessments to enhance Principia's overall climate impact evaluation. The investigation of these impacts is a collaborative effort between the Sustainability department, led by the Head of Sustainability, and the Asset and Administration Services, represented by the Environmental Specialist. **[IRO-1 20 a, AR 9, AR 10]**

Pollution - Identification of impacts, risks and opportunities [E2.IRO-1]

The Group systematically identifies and evaluates actual and potential pollution-related impacts, risks, and opportunities across its operations and value chain through an Environmental Risk Assessment Matrix. This tool categorizes environmental aspects into risk categories such as waste, soil, water, air, biodiversity, landscape, and electromagnetic fields. Environmental aspects are defined as factors from the Group's activities that can affect the environment, while environmental effects are the resulting changes. The assessment applies specific criteria, including impact on the local environment, toxicity, and the effect on natural resources, alongside compliance with national and EU regulations. Each aspect is weighted as low, medium, or high significance, ensuring an organized prioritization of risks. The methodology supports compliance with regulatory frameworks and the effective mitigation of pollution-related risks. **[IRO-1 11 a, AR 1, AR 2, AR 3, AR 4, AR 5, AR 6, AR 7, AR 8]**

The Group conducts consultations with affected communities as part of its Environmental Risk Assessment process to ensure transparency and inclusivity. These consultations focus on understanding community concerns and gathering insights on potential environmental impacts. Feedback is integrated into the assessment, which evaluates environmental aspects such as waste, soil, water, air, biodiversity, and landscape. This collaborative approach helps the Group address community-specific issues and align its operations with local expectations and environmental standards. **[IRO-1 11 b] [IRO-1 AR 9]**

Biodiversity - Identification of impacts, risks and opportunities [E4.IRO-1]

Principia is committed to identifying and assessing the impacts of its operations on biodiversity and ecosystems, guided by its Biodiversity Management Policy. Throughout all stages of project development—including screening and prefeasibility, feasibility and Environmental and Social Impact Assessment (ESIA), detailed design and construction, and operation and maintenance—the Group systematically identifies key biodiversity features, assesses potential risks, and develops mitigation strategies alongside opportunities for biodiversity enhancement. For existing sites lacking prior biodiversity assessments, the Group conducts contextual analyses to determine a Biodiversity Importance Category. Historical records of litigations, fines, and previous biodiversity actions are reviewed to assess potential impacts and inform the development of mitigation or restoration measures, which are continuously monitored for effectiveness. **[IRO-1 17 a, AR 4, AR 5, AR 6, AR 7, AR 8, AR 9]**

In recognizing its dependencies on biodiversity and ecosystem services, Principia prioritizes key biodiversity features and adopts appropriate metrics to quantify losses and gains. The Group establishes baselines or counterfactual scenarios to evaluate project impacts on species and habitats. For sites where historical data is unavailable, it conducts contextual analyses to identify dependencies and ensures these are integrated into operational planning. **[IRO-1 17 b, AR 8] [IRO-1 17 c, AR 9]**

Systemic risks to biodiversity and ecosystems are addressed through an annual environmental risk assessment for each asset. This process incorporates historical evaluations of biodiversity protection efforts and reviews any fines or litigations related to biodiversity issues. Identified risks are managed through targeted mitigation or restoration actions, with monitoring programs in place to ensure these measures effectively reduce biodiversity impacts. **[IRO-1 17 d, AR 9]**

Sites located near biodiversity-sensitive areas

As mentioned earlier, Principia operates 16 sites within Natura 2000 protected areas, designated to preserve natural habitats and species. Even if these sites might potentially pose a risk of disturbing protected species, there is no evidence to date that the Group's activities have negatively impacted any threatened species. To mitigate potential impacts on protected species and habitats, the Group has implemented a range of biodiversity conservation measures. These include habitat restoration and reforestation projects, the installation of bird detection systems, and the execution of bird monitoring studies to minimize disturbances and actively support conservation efforts. **[IRO-1 19 a, AR 7 d] [IRO-1 19 b]**

Consultation with affected parties

The Group ensures that the materials it uses do not have negative impacts on affected communities, as it neither produces nor utilizes hazardous materials. In line with its commitment to responsible sourcing, the Group continuously evaluates its supply chain to identify and mitigate any potential social or environmental risks associated with raw material procurement. This approach aligns with its broader sustainability strategy, prioritizing ethical sourcing and the well-being of local communities. **[IRO-1 17 e(i)]**

To mitigate negative impacts on priority ecosystem services relevant to affected communities, the Group has implemented targeted environmental initiatives. These include habitat restoration, reforestation efforts, bird detection systems, and ongoing bird monitoring studies. These measures help safeguard local biodiversity and promote the sustainable management of natural resources, reinforcing the Group's commitment to environmental stewardship. **[IRO-1 17 e(iii)]**

Business conduct -
Identification of impacts,
risks and opportunities [G1.IRO-1]

To address potential material impacts, risks, and opportunities related to corruption, the Group conducted an evaluation based on criteria tailored to the regulatory and operational environment of its country of operation. This analysis focused on the domestic regulatory framework, particularly in areas where the enforcement of anti-corruption measures might be inconsistent or open to interpretation. Key activities assessed included tendering processes for renewable energy projects, which may present vulnerabilities in competitive bidding environments. The evaluation also examined interactions with local authorities, especially in securing permits, land access, and other essential approvals. Furthermore, particular attention was given to transaction structures involving third-party agents or subcontractors, as these can pose risks of unethical practices, even within a single-country context. The Chief of People, Culture, and Sustainability is responsible for overseeing the Group’s anti-corruption efforts, including the assessment of impacts and the continuous monitoring of related risks, in accordance with ISO 37001—the international standard for anti-bribery management systems. [IRO-1 6]

Disclosure requirements and
incorporation by reference

The tables below summarize all ESRS disclosure requirements from ESRS 2 and the six relevant topical standards deemed material to Principia, which have guided the preparation of our sustainability statement. Disclosure requirements for topical standards E3, E5, S2 and S4 are excluded, as they fall below our materiality thresholds. These tables provide a reference for locating specific disclosure requirements within the sustainability statements and indicate where information found outside these statements is “incorporated by reference.” Such references include the management review or financial statements within the annual report.

DISCLOSURE REQUIREMENTS IN ESRS COVERED
BY THE UNDERTAKING’S SUSTAINABILITY STATEMENT [IRO-2]

Cross-cutting standards Disclosure requirements		Section
ESRS 2 General disclosures		
BP-1	General basis for preparation of the sustainability statement	ESRS 2 General disclosures About this report
BP-2	Disclosures in relation to specific circumstances	ESRS 2 General disclosures Additional information
GOV-1	The role of the administrative, management and supervisory bodies	ESRS 2 General disclosures Governance The role of Management
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	ESRS 2 General disclosures Governance Sustainability governance
GOV-3	Integration of sustainability-related performance in incentive schemes	ESRS 2 General disclosures Governance Sustainability-related performance in incentive schemes
GOV-4	Statement on sustainability due diligence	ESRS 2 General disclosures Governance Statement on due diligence
GOV-5	Risk management and internal controls over sustainability reporting	ESRS 2 General disclosures Governance Risk management and internal controls over sustainability reporting
SBM-1	Strategy, business model and value chain (products, markets, customers)	ESRS 2 General disclosures Strategy Business model and value chain
SBM-2	Interests and views of stakeholders	ESRS 2 General disclosures Strategy Stakeholder engagement
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS 2 General disclosures Strategy Material impacts, risks and opportunities
IRO-1	Description of the process to identify and assess material impacts, risks, and opportunities	ESRS 2 General disclosures Impact, risk and opportunity management Processes to identify and assess material impacts, risks and opportunities
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	ESRS 2 General disclosures Impact, risk and opportunity management Disclosure requirements in ESRS covered by the undertaking's sustainability statement

E1 Climate change		
ESRS 2, GOV-3	Integration of sustainability-related performance in incentive schemes	ESRS 2 General disclosures Governance Sustainability-related performance in incentive schemes
E1-1	Transition plan for climate change mitigation	Climate Change Strategy Transition plan
ESRS 2, SBM-3	Material impacts, risks and opportunities, and their interaction with strategy and business model	ESRS 2 General disclosures Strategy Material impacts, risks and opportunities
ESRS 2, IRO-1	Description of the processes to identify and assess material climate related impacts, risks, and opportunities	ESRS 2 General disclosures Impact, risk and opportunity management Processes to identify and assess material impacts, risks and opportunities
E1-2	Policies related to climate change mitigation and adaptation	Climate Change Strategy Climate change policies
E1-3	Actions and resources in relation to climate change policies	Climate Change Strategy Actions
E1-4	Targets related to climate change mitigation and adaptation	Climate Change Metrics and targets Targets
E1-5	Energy consumption and mix	Climate Change Metrics and targets Metrics – Energy
E1-6	Gross Scopes 1, 2, 3 and total GHG emissions	Climate Change Metrics and targets Metrics – Emissions
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	(not applicable)
E1-8	Internal carbon pricing	(not applicable)
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Climate Change Metrics and targets Anticipated financial effects from risks and opportunities

E2 Pollution		
ESRS 2 IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks, and opportunities	ESRS 2 General disclosures Impact, risk and opportunity management Processes to identify and assess material impacts, risks and opportunities
E2-1	Policies related to pollution	Pollution Impact, risk, and opportunity management Policies
E2-2	Actions and resources related to pollution	Pollution Impact, risk, and opportunity management Actions
E2-3	Targets related to pollution	Pollution Metrics and targets Targets
E2-4	Pollution of air, water, and soil	Pollution Metrics and targets Metrics
E2-5	Substances of concern and substances of very high concern	(not applicable)
E2-6	Anticipated financial effects from pollution-related impacts, risks, and opportunities	Pollution Financial effects

E4 Biodiversity and ecosystems		
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	Biodiversity and ecosystems Strategy Biodiversity transition plan
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Biodiversity and ecosystems Strategy Material impacts, risks and opportunities
ESRS 2, IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies, and opportunities	ESRS 2 General disclosures Impact, risk and opportunity management Processes to identify and assess material impacts, risks and opportunities
E4-2	Policies related to biodiversity and ecosystem	Biodiversity and ecosystems Impact, risk, and opportunity management Policies
E4-3	Actions and resources related to biodiversity and ecosystems	Biodiversity and ecosystems Impact, risk, and opportunity management Actions
E4-4	Targets related to biodiversity and ecosystems	Biodiversity and ecosystems Metrics and targets Targets
E4-5	Impact metrics related to biodiversity and ecosystems change	Biodiversity and ecosystems Metrics and targets Metrics
E4-6	Anticipated financial effects from biodiversity and ecosystems-related risks and opportunities	Biodiversity and ecosystems Metrics and targets Financial effects

S1 Own workforce		
ESRS 2, SBM-2	Interests and views of stakeholders	ESRS 2 General disclosures Strategy Stakeholder engagement
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Biodiversity and ecosystems Strategy Material impacts, risks and opportunities
S1-1	Policies related to own workforce	Employees Impact, risk and opportunity management Policies
S1-2	Processes for engaging with own workers and workers’ representatives about impacts	Employees Impact, risk and opportunity management Processes for engaging with employees
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	Employees Impact, risk and opportunity management Channels to raise concerns
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Employees Impact, risk and opportunity management Actions
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Employees Metrics and targets Targets
S1-6	Characteristics of the undertaking's employees	Employees Metrics and targets Metrics - Characteristics of the undertaking's employees
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	Employees Metrics and targets Metrics – Characteristics of non-employee workers
S1-8	Collective bargaining coverage and social dialogue	Employees Metrics and targets Metrics – Collective bargaining coverage and social dialogue
S1-9	Diversity metrics	Employees Metrics and targets Metrics – Diversity
S1-10	Adequate wages	Employees Metrics and targets Metrics – Adequate wages
S1-11	Social Protection	Employees Metrics and targets Metrics – Social protection
S1-12	Persons with disabilities	Employees Metrics and targets Metrics – Persons with disabilities
S1-13	Training and skills development metrics	Employees Metrics and targets Metrics – Training and skills development
S1-14	Health and safety metrics	Employees Metrics and targets Metrics – Health and safety
S1-15	Work-life balance metrics	Employees Metrics and targets Metrics – Work-life balance
S1-16	Compensations metrics (pay gap and total compensation)	Employees Metrics and targets Metrics – Compensation
S1-17	Incidents, complaints and severe human rights impacts	Employees Metrics and targets Metrics – Incidents, complaints and severe human rights impacts

S3 Affected communities		
ESRS 2, SBM-2	Interests and views of stakeholders	Affected communities Strategy Stakeholder engagement
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Affected communities Strategy Material impacts, risks and opportunities
S3-1	Policies related to affected communities	ESRS 2 General disclosures Impact, risk and opportunity management Policies
S3-2	Processes for engaging with affected communities about impacts	Affected communities Impact, risk and opportunity management Processes to identify and assess material impacts, risks and opportunities
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Affected communities Impact, risk and opportunity management Channels to raise concern
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Affected communities Impact, risk and opportunity management Actions
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	(not applicable)

G1 Business conduct		
ESRS 2, SBM-2	The role of the administrative, supervisory and management bodies	ESRS 2 General disclosures Strategy Stakeholder engagement
ESRS 2, IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	ESRS 2 General disclosures Impact, risk and opportunity management Processes to identify and assess material impacts, risks and opportunities
G1-1	Business conduct policies and corporate culture	Business conduct Impact, risk, and opportunity management Policies and corporate culture
G1-2	Management of relationships with suppliers	Business conduct Impact, risk, and opportunity management Management of relationships with suppliers
G1-3	Prevention and detection of corruption and bribery	Business conduct Impact, risk, and opportunity management Prevention and detection of corruption and bribery
G1-4	Incidents of corruption or bribery	Business conduct Metrics and targets Confirmed incidents of corruption or bribery
G1-5	Political influence and lobbying activities	Business conduct Metrics and targets Political influence and lobbying activities
G1-6	Payment practices	Business conduct Metrics and targets Payment practices

Datapoints that derive from other EU legislation

The table below includes all the datapoints that derive from other EU legislation as listed in ESRS 2 appendix B, indicating where the data points can be found in our report and which data points are assessed as “Non-material”.

Disclosure Requirement	Data point	Sustainability Statements Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section
ESRS 2 GOV-1	21 (d)	Board's gender diversity	X		X		ESRS 2 General disclosure / Governance / The role of Management
ESRS 2 GOV-1	21	Percentage of board members who are independent			X		ESRS 2 General disclosure / Governance / Statement on due diligence
ESRS 2 GOV-4	30 (e)	Statement on due diligence	X				ESRS 2 General disclosure / Governance / The role of Management
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel activities	X	X	X		ESRS 2 General disclosure / Strategy / Business model and value chain
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	X		X		ESRS 2 General disclosure / Governance / Business model and value chain
ESRS 2 SBM-1	40 (d) iii	Involvement in activities related to controversial weapons	X		X		ESRS 2 General disclosure / Governance / The role of Management
ESRS 2 SBM-1	40 (d) iv	Involvement in activities related to cultivation and production of tobacco			X		ESRS 2 General disclosure / Strategy / Business model and value chain
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				X	Climate Change/ Strategy / Transition plan
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned Benchmarks		X	X		Climate Change/ Strategy / Transition plan
ESRS E1-4	34	GHG emission reduction targets	X	X	X		Climate Change/ Metrics and Targets / Targets
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	X				Climate Change/ Metrics and Targets / Financial reconciliation
ESRS E1-5	37	Energy consumption and mix	X				Climate Change/ Metrics and Targets / Financial reconciliation
ESRS E1-5	40-43	Energy intensity associated with activities in high climate impact sectors	X				Climate Change/ Metrics and Targets / Financial reconciliation
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions	X	X	X		Climate Change/ Gross Scope 1, 2, 3 and Total GHG emissions
ESRS E1-6	53-55	Gross GHG emissions intensity	X	X	X		Climate Change/ Gross Scope 1, 2, 3 and Total GHG emissions
ESRS E1-7	56	GHG removals and carbon credits				X	N/A
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			X		N/A
ESRS E1-9	66 (a); 66 (c)	Disaggregation of monetary amounts by acute and chronic physical risk; Location of significant assets at material physical risk		X			N/A
ESRS E1-9	67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		X			N/A
ESRS E1-9	69	Degree of exposure of the portfolio to climate-related opportunities			X		N/A

Disclosure Requirement	Data point	Sustainability Statements Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water, and soil	X				Pollution/ Methodologies
ESRS E3-1	9	Water and marine resources	X				N/A
ESRS E3-1	13	Dedicated policy	X				N/A
ESRS E3-1	14	Sustainable oceans and seas	X				N/A
ESRS E3-4	28 (c)	Total water recycled and reused		X			N/A
ESRS 2-SBM 3 - E4	16 (a) i	Biodiversity sensitive areas	X				Biodiversity end ecosystems/ Strategy/ Material impacts, risks and opportunities
ESRS 2-SBM 3 - E4	16 (b)	Negative impacts with regards to land degradation, desertification or soil sealing	X				Biodiversity end ecosystems/ Strategy/ Material impacts, risks and opportunities
ESRS 2-SBM 3 - E4	16 (c)	Threatend species	X				Biodiversity end ecosystems/ Strategy/ Material impacts, risks and opportunities
ESRS E4-2	24 (b)	Sustainable land / agriculture practices or policies	X				Biodiversity end ecosystems/ Impacts, risks and opportunities management/ Policies
ESRS E4-2	24 (c)	Sustainable oceans / seas practices or policies	X				Biodiversity end ecosystems/ Impacts, risks and opportunities management/ Policies
ESRS E4-2	24 (d)	Policies to address deforestation	X				Biodiversity end ecosystems/ Impacts, risks and opportunities management/ Policies
ESRS E5-5	37 (d)	Non-recycled waste	X				N/A
ESRS E5-5	39	Hazardous waste and radioactive waste	X				N/A
ESRS 2- SBM3 - S1	14 (f)	Risk of incidents of forced labor	X				Employees/ Strategy / Material impacts, risks and opportunities
ESRS 2- SBM3 - S1	14 (g)	Risk of incidents of child labor	X				Employees/ Strategy / Material impacts, risks and opportunities
ESRS S1-1	20	Human rights policy commitments	X				Employees / Impacts, risks and opportunities management / Policies
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8			X		Employees / Impacts, risks and opportunities management / Policies
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	X				Employees / Impacts, risks and opportunities management / Policies
ESRS S1-1	23	Workplace accident prevention policy or management system	X				Employees / Impacts, risks and opportunities management / Policies
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	X				Employees / Impacts, risks and opportunities management / Channels to raise concerns
ESRS S1-14	88 (b) and (c)	Number of fatalities and number and rate of work-related accidents	X		X		Employees / Impacts, risks and opportunities management / Health and safety metrics
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities, or illness	X				Employees / Impacts, risks and opportunities management / Health and safety metrics

Disclosure Requirement	Data point	Sustainability Statements Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section
ESRS S1-16	97 (a)	Unadjusted gender pay gap	X		X		Employees / Impacts, risks and opportunities management / Compensation metrics
ESRS S1-16	97 (b)	Excessive CEO pay ratio	X				Employees / Impacts, risks and opportunities management / Compensation metrics
ESRS S1-17	103 (a)	Incidents of discrimination	X				Employees / Impacts, risks and opportunities management / Incidents, complaints and severe human rights impacts
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD	X		X		Employees / Impacts, risks and opportunities management / Incidents, complaints and severe human rights impacts
ESRS 2-SBM3-S2	11 (b)	Significant risk of child labour or forced labour in the value chain	X				N/A
ESRS S2-1	17	Human rights policy commitments	X				N/A
ESRS S2-1	18	Policies related to value chain workers	X				N/A
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	X		X		N/A
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8			X		N/A
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	X				N/A
ESRS S3-1	16	Human rights policy commitments	X				Affected communities / Impacts, risks and opportunity management / Policies
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	X		X		Affected communities / Impacts, risks and opportunity management / Policies
ESRS S3-4	36	Human rights issues and incidents	X				Affected communities / Impacts, risks and opportunity management / Actions
ESRS S4-1	16	Policies related to consumers and end-users	X				N/A
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	X		X		N/A
ESRS S4-4	35	Human rights issues and incidents	X				N/A
ESRS G1-1	§10 (b)	United Nations Convention against Corruption	X				Business conduct/ Risks and opportunity management / Policies and corporate culture
ESRS G1-1	§10 (d)	Protection of whistle- blowers	X				Business conduct/ Risks and opportunity management / Policies and corporate culture
ESRS G1-4	§24 (a)	Fines for violation of anti-corruption and anti-bribery laws	X		X		Business conduct/ Metrics and targets/ Confirmed incidents of corruption or bribery
ESRS G1-4	§24 (b)	Standards of anti- corruption and anti-bribery	X				Business conduct/ Metrics and targets/ Confirmed incidents of corruption or bribery

Climate Change [E1]



 principia

STRATEGY

Transition plan ^[E1-1]

Principia has outlined its pathway toward climate change mitigation, with plans to adopt a comprehensive transition plan by 2025. This plan will include the measurement and validation of Scope 1, Scope 2, and Scope 3 emissions, forming the foundation for setting science-based interim targets and a net zero target aligned with the Paris Agreement. The Group is committed to achieving net zero emissions by 2040 at the latest. The Group is also not excluded from the EU Paris-aligned Benchmarks. This indicates that Principia meets the criteria set forth by the EU for alignment with the Paris Agreement goals, which aim to limit global warming to well below 2°C, and preferably to 1.5°C, compared to pre-industrial levels. **[E1-1 16 g] [E1-1 17]**

Also, the Net-Zero Business Plan (Transition Plan) will be duly submitted for approval by the Board of Directors. The process will involve the following steps:

- **Carbon Footprint Measurement and Validation:** This includes emissions from direct, owned/controlled sources, indirect emissions from purchased electricity, and indirect emissions across the value chain.
- **Setting Science-Based Targets:** Targets will be aligned with the 1.5°C pathway, aiming for Net Zero by 2040 with an interim target set for 2030.
- **Developing the Business Plan:** A detailed plan outlining the CAPEX and OPEX requirements for achieving the net-zero targets will be prepared for review and approval by the Board. **[E1-1 16 a, AR 2] [E1-1 16 h] [E1-1 16 i] [E1-1 16 j]**

Climate resilience analysis ^[SBM-3]

The Group recognizes that understanding material impacts, risks, and opportunities is critical to shaping a resilient strategy and sustainable business model. Principia aims to embed climate considerations into its core operations, aligning with stakeholder expectations and driving long-term value creation. Specifically, it has identified extreme weather events as a significant climate-related physical risk, particularly within the renewables sector, where operational disruptions and potential asset damage pose substantial challenges. In response, the Group has undertaken structural and operational adjustments to enhance resilience and adaptability. These measures are contributing to a strengthened financial and operational stability, reducing recovery costs and mitigating vulnerabilities such as rising insurance premiums. Additionally, the Group has identified an opportunity to contribute to the energy transition by enhancing the integration of renewable energy sources (RES) into the country's energy mix through battery energy storage systems (BESS). Notably, the Group won one of the BESS tenders organized by RAE in February 2024 and has been developing a BESS project in Poligiros municipality (Chalkidiki, Greece). **[E1.SBM-3 AR 8 b]**

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

Climate change policies ^[E1-2]

Principia recognizes the importance of addressing climate change and is in the process of developing a climate change policy, which is expected to be introduced in 2025. This will encompass strategies for climate change mitigation, adaptation, energy efficiency, and renewable energy deployment. As part of its commitment, the Group is also focused on promoting the development of electricity generation from renewable sources, specifically wind, solar, small hydro, and Battery Energy Storage Systems.

Furthermore, through its Environmental Policy, Principia integrates climate change mitigation and adaptation into its strategic priorities and day-to-day operations, this way aiming to reduce greenhouse gas emissions and enhancing resilience against climate-related risks. Renewable energy adoption and energy efficiency across its value chain are incorporated, also including transitional risks and exploring opportunities provided by the upcoming energy transition. To address physical climate risks, both chronic and acute, Principia aims to reduce the vulnerability of its operations and infrastructure by increasing resilience to the effects of climate change. Principia also adapts and implements an environmental management system according to international standards, promotes the use of best available technologies (BAT), collaborates with TIER 1 suppliers, ensuring the supply and installation of certified equipment structures and the application of sustainable design criteria to minimize lifecycle impacts. Principia's Environmental Policy considers climate change mitigation and adaptation as integral components of its operations. By embedding environmental protection into its decision-making and management processes, the Group ensures the adoption of best available practices and technologies, with a particular focus on lifecycle analysis and circular economy principles. Proactive measures are implemented to minimize environmental impacts, supported by risk assessments and strict adherence to operational procedures and emergency response plans. **[E1-2 24] [E1-2 25, AR 16, AR 17, AR 18] [ESRS 2 62]**

METRICS

Metrics – Energy ^[E1-5]

Total energy consumption	ESRS Indicator	Unit	2024
Total energy consumption	[E1-5 37, AR 35]	MWh	5.238
Total energy consumption from activities in high climate impact sectors	[E1-5 41]	MWh	5.238
Percentage of renewable sources in total energy consumption	[E1-5 AR 34]	%	0
Percentage of fossil sources in total energy consumption	[E1-5 AR 34]	%	100

Fossil energy	ESRS Indicator	Unit	2024
Total energy consumption	[E1-5 37 a, AR 32, AR 33]	MWh	5.238
Total crude oil and petroleum products	[E1-5 38 b, AR 33]	MWh	1.295
Electricity purchased and consumed from fossil sources	[E1-5 38 e, AR 33]	MWh	3.943

Renewable energy	ESRS Indicator	Unit	2024
Total renewable energy consumed	[E1-5 37 c]	MWh	0
Energy from renewable sources produced and consumed	[E1-5 37 c(iii)]	MWh	0
Total renewable energy produced	[E1-5 39]	MWh	1.133.347

Intensities	ESRS Indicator	Unit	2024
Energy intensity ratio	[E1-5 40, AR 36]	Rate	43
GHG emissions intensity (location-based)	[E1-6 53, AR 53]	Rate	19

Revenue	ESRS Indicator	Unit	2024
Net revenue from activities in high climate impact sectors	[E1-5 AR 38 b]	Million €	124
Net revenue used to calculate GHG intensity	[E1-6 46 AR 55]	Million €	124

Financial reconciliation

The Group’s energy consumption includes electricity purchased from the grid to power offices, electric vehicles, and renewable energy assets such as photovoltaic (PV) parks, wind farms and hydro plants. In addition to grid electricity, fuel consumption from petroleum products supports operations at construction sites, machinery used for construction, and vehicles, contributing to the overall energy mix. Although the fuel consumption for maintenance activities is negligible, it still plays a role in the Group’s energy footprint ⁹. **[E1-5 42]**

⁹ Energy consumption from high-impact sectors is disclosed in the financial statements, with net revenue from activities such as purchased electricity, fuel usage at construction sites, and the generation of renewable energy reflected in the appropriate line items. [E1-5 43, AR 38]

Metrics – Emissions ^[E1-6]

The Group has been reporting Scope 1, Scope 2, and Scope 3 emissions up until 2023 as a subsidiary of Enel Green Power. Starting in 2024, Principia has been measuring Scope 1 and Scope 2 emissions, which have not yet been validated. **[E1-6 47] [E1-6 AR 42 c]**

Total emissions	ESRS Indicator	Unit	2024
Total emissions (location-based)	[E1-6 44, 52 a, AR 47]	t CO2e	2.310

Scope 1	ESRS Indicator	Unit	2024
Total Scope 1 emissions	[E1-6 48 a, AR 43]	t CO2e	340

Principia’s Scope 2 GHG emissions are associated with the purchase of electricity used to support its business activities. This includes electricity consumed from the grid for powering offices, electric vehicles, and renewable energy parks. In calculating Scope 2 emissions, the Group has applied the country-specific emission factors of the power system using a location-based model, ensuring the emissions are accurately aligned with the regional grid’s emission profile. **[E1-6 AR 45 d]**

Scope 2	ESRS Indicator	Unit	2024
Total location-based emissions from electricity (grid average)	[E1-6 49 a, 52 a, AR 45, AR 47]	t CO2e	1.970

Scope 3 emissions

The Group plans to measure Scope 3 emissions in 2025, but this category is currently excluded from the emissions reporting.¹⁰ **[E1-6 AR 46 i][E1-6 AR 46 h]**

Emissions methodologies

Principia’s calculation methodology for GHG emissions aligns with the GHG Protocol for Scopes 1 and 2 and ensures consistency with internationally recognized standards. In particular, Scope 2 emissions were calculated using a market-based approach, employing the emissions intensity index provided by DAPEEP for 2023. This index considers the average emission intensity of the network, derived from the Residual Energy Mix, as detailed in DAPEEP’s 2023 energy mix report. For Scope 1, only CO₂ emissions were accounted for, as emissions of CH₄, N₂O, HFCs, PFCs, SF₆, and NF₃ were either zero or negligible. Scope 3 emissions were not calculated for the reporting year. **[E1-6 AR 39 b]**

Anticipated financial effects from risks and opportunities ^[E1-9]

Principia has identified financial effects related to climate change, though these have been assessed only qualitatively. However, these effects have not been explicitly categorized into physical and transition risks at this stage. Additionally, the specific facilities impacted by these risks have not yet been identified. While the Group recognizes the financial implications of climate-related risks, further analysis and categorization will be undertaken in subsequent periods to better understand the scope and locations of the risks involved.

¹⁰ These changes in the scope of the value chain and the exclusion of Scope 3 emissions will affect the comparability of reported GHG emissions year to year, with plans for Scope 3 emissions to be included in the future.



Pollution

[E2]



 principia

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

Policies ^[E2-1]

Principia has established an Environmental Policy that outlines its commitment to managing material impacts, risks, and opportunities associated with pollution. Key strategic goals include preserving water, air, and soil while optimizing water management. The policy emphasizes efficient water use in industrial operations, particularly in water-stress areas, by reducing consumption, minimizing freshwater withdrawal, and increasing wastewater recovery. It also focuses on preventing and controlling soil and air pollution, minimizing ecosystem impacts, and undertaking rehabilitation where necessary. Additionally, water management plans in hydropower plants aim to maintain the ecological integrity of catchments and support services for local communities. **[E2-1 14, AR 10] [E2-1 15 a, AR 11]**

Principia is committed to substituting and minimizing the use of substances of concern and actively phasing out substances of very high concern. These efforts prioritize reducing potential environmental and health impacts, particularly in non-essential societal uses and consumer products, in alignment with the Group's sustainability objectives and regulatory compliance. **[E2-1 15 b, AR 11]**

Also, Principia has implemented an Emergency Response Plan, complemented by site-specific Emergency Response Plans for individual plants. These plans include clear instructions for managing incidents to mitigate their impacts and restore conditions to their original state. The policies are designed to prioritize the safety of people and minimize environmental impacts, ensuring a structured and effective response to potential emergencies. **[E2-1 15 c]**

Actions ^[E2-2]

Principia anticipates significant financial effects from pollution-related risks and opportunities arising from both site selection and operational activities. Principia implements several initiatives to address pollution. A dedicated tool washing machine at the Thrace wind farms minimizes the use of cloths and chemical cleaning materials. Additionally, most equipment such as transformers, oils and chemical substances, are placed above oil spillage basins to prevent environmental contamination. Moreover, in emergency situations, immediate containment and isolation are prioritized to prevent further environmental impact. Additional actions include the evacuation and protection of personnel, absorption and collection of spilled oil with the use of available oil spill kits on sites, decontamination of affected surfaces, and safe storage and disposal of contaminated materials in designated waste point containers where also oils spill kits are placed and available. The Group also focuses on soil and water remediation, environmental monitoring, and implementing preventive measures to reduce future incidents. **[E2-2 18]**

The Group's pollution-related actions include engagement across its value chain. Emergency response measures, such as containment, decontamination, and remediation, ensure effective handling of incidents to protect both upstream and downstream environments. **[E2-2 AR 13]**



METRICS AND TARGETS

Targets ^[E2-3]

The Assets & Administration Services (AAS)-Environmental, Operations & Maintenance (O&M), and Engineering & Construction (E&C) departments have set specific pollution targets to address air, water, soil, and substances of concern, emphasizing the prevention and mitigation of environmental risks. Targets for Health, Safety & Environmental (HSE) near misses focus on proactively reporting and analyzing environmental events, aiming to minimize incidents such as hazardous material spillage, water discharge violations, equipment malfunctions, and disturbances to local wildlife habitats. The annual target of one near miss was met, with one incident recorded. For environmental accidents, which include events like fires, floods, chemical spills, mechanical failures, and habitat destruction, the target was set at fewer than or equal to one incident per year, with zero incidents recorded, successfully meeting expectations. Additionally, annual site drills are conducted to ensure preparedness for environmental emergencies such as oil spills, with the target of one drill per year achieved. To further strengthen environmental stewardship, the Group also prioritizes employee training to prevent and address environmental failures, with an annual training target in place, and results pending finalization. **[E2-3 22, AR 19] [E2-3 23 a] [E2-3 23 b] [E2-3 23 c] [E2-3 23 d]**

The pollution-related targets established by the AAS-Environmental, Operations & Maintenance (O&M), and Engineering & Construction (E&C) departments are voluntary and not mandated by legislation. These targets reflect the Group’s proactive approach to environmental stewardship, prioritizing the prevention of pollution and the protection of natural resources beyond regulatory compliance. **[E2-3 25]**

Metrics ^[E2-4]

Principia confirms that there are no tracked water pollutant levels over time. However, the Group conducts annual water quality measurements at its hydro plants to assess any potential pollution. **[E2-4 30 a]** Water quality measurements at the Group’s hydro plants are conducted annually using established methodologies to assess potential pollutants in the water. Data for pollution-related accounting and reporting is collected through these periodic assessments. Although direct measurements are preferred, estimations are not employed due to the regularity and accuracy of the water quality tests performed. **[E2-4 30 b, AR 26, AR 27] [E2-4 30 c, AR 27] [E2-4 31]**

The table below presents data on pollutants emitted for the year 2024, specifically emissions to soil and water by pollutant:

Pollutants emitted	ESRS Indicator	Unit	2024
Emissions to soil by pollutant	[E2-4 28 a, AR 21, AR 22]	t	0
Emissions to water by pollutant	[E2-4 28 a, AR 21, AR 22]	t	0

Financial effects [E2-6]

Principia has identified both risks and opportunities related to pollution that can significantly affect its enterprise value. On the opportunity side, measures such as an environmental management system, staff training, and emergency risk simulations for soil pollution reduce potential remediation costs, prevent regulatory fines, and foster local community trust. Similarly, annual water quality assessments ensure compliance with standards, minimizing the risk of costly penalties and environmental damage while supporting sustainable water resource management. Conversely, risks include soil pollution or degradation during equipment setup or park management, which may lead to increased operational expenses, reputational harm, and potential fines. Water contamination risks in hydroelectric power production could result in lawsuits, regulatory penalties, and ecosystem disruption, further elevating costs and damaging market trust. [E2-6 39 a]

The impacts of pollution-related risks and opportunities vary in nature and timing. For soil pollution, risks such as reduced land productivity and harm to local ecosystems may materialize in the short to medium term during construction and operational phases, while long-term effects could include community dissatisfaction and degraded ecosystems requiring costly remediation. Similarly, water pollution risks from hydroelectric power operations, such as harmful discharges, could disrupt aquatic life and ecosystems immediately, with longer-term consequences including lawsuits and increased operational expenses. On the opportunity side, immediate effects of proactive actions like water quality assessments and staff training include enhanced operational efficiency and regulatory compliance, while their long-term impacts are seen in sustained ecosystem health and strengthened market reputation. [E2-6 39 b] ^{12 13}

12 The assumptions underlying this analysis include the expectation that the financial effects of the initiatives will be significant, particularly in areas related to regulatory compliance, legal obligations, and operational costs. It is assumed that the Group will continue to prioritize environmental sustainability, resulting in proactive investments in biodiversity assessments and compliance measures to mitigate the risk of regulatory penalties. [E2-6 39 c, AR 33]

13 No incidents were noted for the reporting year. [E2-6 41]

The table below outlines the anticipated financial effects related to environmental matters, including expenses and provisions for major incidents and pollution-related deposits, all of which amount to zero in the reporting period.

Anticipated financial effects	ESRS Indicator	Unit	2024
Operating expenses incurred in the reporting period in conjunction with major incidents and deposits (pollution-related)	[E2-6 40 b, AR 31]	€	0
Capital expenses incurred in the reporting period in conjunction with major incidents and deposits (pollution-related)	[E2-6 40 b, AR 31]	€	0
Provisions for environmental protection and remediation costs	[E2-6 40 c, AR 31 a]	€	0

Biodiversity & Ecosystems [E4]



 principia

STRATEGY

Material impacts, risks and opportunities [SBM-3]

Principia is fully committed to protecting biodiversity and reducing its environmental footprint, especially in ecologically sensitive areas. 16 of its operational sites are located within Natura 2000 designated areas, which are internationally recognized for their ecological significance and role in conserving biodiversity. In line with its commitment to environmental stewardship, Principia places high importance on safeguarding threatened species. Bird monitoring studies and specialized ecological evaluations across operational areas confirm that no threatened species have been negatively impacted by the Group's activities. Further, Principia confirms that no material sites fall within its operations or under its direct operational control. After assessing potential and actual impacts on biodiversity and ecosystems, the Group has determined that none of its operational sites meet the criteria for materiality. Lastly, no significant negative impacts related to land degradation, desertification, or soil sealing have been identified in the Group's activities. **[SBM-3 16 a(i)] [SBM-3 16 a(iii)] [SBM-3 16 c] [SBM-3 16 a] [SBM-3 16 a(ii)] [SBM-3 16 b]**

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

Policies [E4-2]

Principia is committed to biodiversity protection by adhering to the mitigation hierarchy, which guides activity planning to minimize negative impacts on species and habitats. This approach includes conducting detailed impact assessments, avoiding operations in areas of high biodiversity value, and implementing targeted mitigation measures when necessary. The Group collaborates with local communities, NGOs, and academic institutions to develop and execute ecosystem protection and restoration projects, with regular monitoring to ensure their effectiveness. Biodiversity considerations are embedded across all stages of project development and operations. **[E4-2 22, AR 11]**

Project development phase

During project development, Principia evaluates the status of species, including population sizes and extinction risks. Priority is given to identifying at-risk species and habitats, and projects in high-conservation-value areas are avoided whenever feasible. In cases where impacts are unavoidable, strategies such as habitat restoration and offsetting are applied to prevent species decline and safeguard endangered populations. **[E4-2 23 b]**

To prevent biodiversity degradation, the Group emphasizes traceability throughout its value chain. Suppliers are required to adhere to biodiversity standards by sourcing materials sustainably. Monitoring and reporting systems provide transparency, ensuring sustainable practices and protecting critical ecosystems from harm. **[E4-2 23 d]**

Also, Principia prioritizes sourcing and production methods that enhance biodiversity. The biodiversity status of affected ecosystems is tracked through regular monitoring and reporting. Infrastructure designs and operational practices are carefully developed to avoid ecosystem harm and, wherever possible, contribute to restoration or enhancement initiatives. **[E4-2 23 e]**

Principia integrates biodiversity and ecosystem considerations into every stage of a project's lifecycle. During the Feasibility and Environmental and Social Impact Assessment (ESIA) phases, potential impacts on biodiversity-sensitive areas are carefully evaluated, and mitigation measures are embedded into project plans. Specialists implement targeted actions, such as installing bird flight diverters on transmission lines or constructing culverts on roads, to minimize disturbances to local species and habitats. **[E4-2 24 a]**

Design and Construction phase

At the Detailed Design and Construction phase, the Group prioritizes minimizing disruptions to land ecosystems. Measures are taken to prevent soil spillages and erosion, while infrastructure designs are tailored to fit the local environment. Staff and contractors adhere to sustainable agricultural practices to preserve soil fertility, enhance land health, and mitigate impacts on native flora and fauna. **[E4-2 24 b]**

For projects situated near marine environments, the Feasibility and ESIA phases involve comprehensive assessments of potential impacts on marine biodiversity. Mitigation strategies, such as

implementing pollution and emissions abatement controls, are integrated into project design and operational plans. Activities in and around aquatic ecosystems are managed to avoid disturbances to marine life, ensuring the protection and preservation of marine biodiversity. **[E4-2 24 c]**

During the Screening and Prefeasibility stages, the Group assesses deforestation risks and develops strategies to minimize tree loss. In cases where deforestation cannot be avoided, measures are implemented to limit land clearance, promote reforestation, and conserve local forests. These actions are designed to maintain biodiversity, responsibly manage deforestation, and support global reforestation goals. **[E4-2 24 d]**



ACTIONS [E4-3]

Biodiversity population control

Principia has implemented a range of actions to mitigate the environmental impacts of its operations on local wildlife and ecosystems. These include bird monitoring programs and collision prevention systems, such as bird detection and acoustic monitoring near wind turbines, aimed at reducing bird collisions. Additionally, the Group has initiated habitat enhancement projects away from wind turbine sites to offset wildlife displacement. Notable initiatives include a bird feeding program in Agios Kyrillos, Crete, and the introduction of Tyto alba owls for natural rodent control at photovoltaic parks. [E4-3 27]

To further offset the impacts of its operations, particularly in areas affected by wind energy production, the Group focuses on creating compensatory habitats and employing non-invasive methods to reduce wildlife displacement. These biodiversity offsets are supported by operational budgets and sustainability investments, ensuring long-term financial commitment. The Group regularly assesses the effectiveness of these actions through key performance indicators (KPIs) such as species population monitoring, habitat restoration success rates, and the performance of collision mitigation systems. [E4-3 28 b] [E4-3 28 b(i)]

The Group’s biodiversity efforts include establishing habitats for displaced species, enhancing areas away from wind turbines, and employing innovative approaches like introducing Tyto alba owls for rodent control. Additionally, the use of ex situ breeding for reforestation projects, such as the Chestnut Forest in Euboea, supports biodiversity conservation by promoting the survival and restoration of key plant species. [E4-3 28 b(iii)]

Principia integrates indigenous knowledge and nature-based solutions into its biodiversity initiatives. By using Tyto alba owls for rodent control, the Group eliminates the need for harmful chemicals, promoting ecological balance. Restoration projects also leverage local knowledge of plant species and wildlife behaviors, ensuring that habitat restoration efforts are closely aligned with the needs of the local environment. [E4-3 28 c, AR 21]

The tables below present the operating expenses for hydro and wind energy, reflecting the financing effects, including direct and indirect costs, associated with biodiversity offsets.

Spending on actions – HYDRO	ESRS Indicator	Unit	2024
Waste management - Environmental terms Approval Renewal	[E4-3 28 b(ii), AR 18]	€	6.000

Spending on actions - WIND	ESRS Indicator	Unit	2024
Birds Monitoring Systems	[E4-3 28 b(ii), AR 18]	€	254.157
Plantation maintenance	[E4-3 28 b(ii), AR 18]	€	171.438
Other Categories	[E4-3 28 b(ii), AR 18]	€	36.731

METRICS AND TARGETS

Targets [E4-4]

Target	Applicable from FY
Conduct two bird studies at wind farms ¹⁴	FY 24
Conduct an environmental drill on-site	FY 24
Organize environmental training	FY 24
Limit environmental accidents to 1	FY 24
Limit near miss events to 1	FY 24

The Group has set clear biodiversity-related targets for 2024 and plans to introduce additional goals for 2025. For 2024, these targets included conducting two bird studies at wind farms, carrying out one environmental drill on-site to ensure emergency preparedness, and organizing an environmental training session for employees to prevent and manage environmental failures. The Group also aimed to limit environmental accidents to fewer than one and restrict environmental near-miss events to a single occurrence—both of which were successfully achieved. Looking ahead to 2025, the Group is planning to introduce new targets, including zero bird collision events, alongside other goals that are yet to be defined. **[E4-4 31, AR 23, AR 24, AR 25, AR 26]** Responsibility for implementing and monitoring biodiversity-related targets lies with the AAS-Environmental, Operations & Maintenance (O&M), and Engineering & Construction (E&C) departments. These teams are tasked with managing Key Performance Indicators such as bird studies, preventing bird collisions, and addressing habitat disturbances. **[E4-4 32 a(iii)]**

14 Target number of bird studies is defined on annual basis depending on projects' requirements.

Metrics [E4-5]

The table below provides information on the area of sites owned, leased, or managed by the undertaking that are located in or near protected areas or key biodiversity areas and are subject to negative impacts.

Sites near biodiversity-sensitive areas	ESRS Indicator	Unit	2024
Area of sites owned, leased or managed in or near these protected areas or key biodiversity areas	[E4-5 35]	Ha	1.135

Financial effects [E4-6]

The selection of each new park location is managed by the Business Development department, which conducts specialized studies focusing on biodiversity, assessing habitats, resource utilization, and Natura areas to ensure environmental conservation. These studies are overseen by Assets and Administration Services, monitored by an Environmental Specialist, and verified using geospatial data analysis. This initiative presents both a risk and an opportunity for the Group. While inadequate environmental assessments could lead to legal or regulatory challenges, it also offers an opportunity to develop environmentally responsible parks, thereby potentially mitigating future risks and costs related to environmental damage or regulatory non-compliance, which can

positively impact the Group's enterprise value. The financial effects of this initiative are found in regulatory, legal, operational, and business aspects, with potential costs associated with conducting the studies and ensuring compliance.

In addition, the Group operations inherently risk degrading surrounding ecosystems or harming protected areas, which poses a significant risk to the Group. This may lead to environmental harm, regulatory violations, and reputational damage, with financial effects spanning regulatory, legal, operational, reputational, and business dimensions. **[E4-6 45 a]**¹⁵

These initiatives are expected to generate financial impacts over the medium term (1–5 years) and the long term (beyond 5

years). In the mid-term, the Group may incur costs related to conducting biodiversity assessments, ensuring compliance with environmental regulations, and mitigating immediate risks of ecosystem degradation. However, all these efforts could prevent potential legal and regulatory penalties, offering cost savings. In the long term, the Group stands to benefit from enhanced reputation, reduced environmental liabilities, and the protection of enterprise value by maintaining sustainability in park developments and regulatory compliance. On the other hand, failure to address these risks could result in significant financial losses, including regulatory fines, legal expenses, and reputational damage, with lasting impacts well beyond the short term. **[E4-6 45 b]**

15 The assumptions underlying this analysis include the expectation that the financial effects of the initiatives will be significant, particularly in areas related to regulatory compliance, legal obligations, and operational costs. It is assumed that the Group will continue to prioritize environmental sustainability, resulting in proactive investments in biodiversity assessments and compliance measures to mitigate the risk of regulatory penalties. [E4-6 45 c]

Employees [s1]



STRATEGY

Material impacts, risks and opportunities ^[SBM-3]

Types of own workforce

The Group's own workforce consists primarily of employees engaged in various roles across its operations. The employee category includes both permanent staff and two temporary employees. These employees are primarily located at our headquarters, with some also based at operational sites.

Non-employees in the workforce, such as contractors and subcontractors, are only engaged during the construction or operational phases, with a particular focus on construction and maintenance activities at the sites. These individuals are typically employed by the contracted companies. **[SBM-3 14 a]**

IROs to own workforce

Principia identifies health and safety as a material risk for its own workforce, encompassing both employees and non-employees. These risks are addressed through comprehensive health insurance coverage and a Health and Safety Management System. Additionally, the Group acknowledges the importance of understanding how certain characteristics, working contexts, or activities may place individuals at greater risk of harm, and ensures that these considerations are integrated into its health and safety measures. The Group is certified according to ISO Standard ISO45001:2018 and applies an Occupational health and safety management system. Principia is addressing workplace hazards, fostering a culture of prevention, and integrating specific risk factors related to working contexts or individual characteristics **[SBM-3 16, AR 9] [SBM-3 15, AR 8]**

No accidents or incidents occurred within Group's operations. Risks related to labor are proactively addressed and mitigated through the implementation

of Human Rights, Violence and Harassment and Stop Work Policies and procedures relevant to business conduct. These measures are designed to prevent material negative impacts, whether systemic or related to individual incidents, and ensure the responsible and ethical management of labor practices across all operational contexts. **[SBM-3 14 b] [SBM-3 14 c] [SBM-3 14 d, AR 44]**

The Group recognizes the potential risk of child labor within its supply chain, particularly related to the activities of its main suppliers providing materials such as PV panels and batteries, which are imported from regions outside the EU. To mitigate these risks and associated adverse impacts, Principia has established a new policy - Human Rights Risk Management Policy in Supply Chain – and a Human Rights Management framework.

To further strengthen these efforts, the Group has established a **Human Rights Supply Chain Committee (HRSCC)**. The committee operates under the responsibility of key leadership roles and is tasked with developing risk mapping methodologies to identify salient human rights impacts, monitoring suppliers' performance, and proposing requirements for assessment, contracting, training, auditing, and exclusion of non-compliant suppliers. The HRSCC systematically evaluates and revises its list of critical suppliers on an annual basis and ensures an up-to-date risk profile.

The committee also holds annual meetings with critical suppliers to strengthen the integrity of sustainability in supply chain management and communicate Principia's human rights requirements. These engagements involve the discussion of findings from supplier audits, addressing risks, and proposals of corrective actions where necessary. **[SBM-3 14 f(i)] [SBM-3 14 f(ii)] [SBM-3 14 g(i)] [SBM-3 14 g(ii)]**

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

Policies ^[S1-1]

Respect for human and labor rights in our workforce

Principia ensures that the rights of all employees are respected, safeguarded, and promoted within the workplace by regularly updating its policies to ensure they align with legal standards and reflect global developments. Key elements include the promotion of equal treatment, non-discrimination, and protection against any form of abuse or exploitation. The Group also offers awareness seminars on diversity, unconscious bias, and harassment prevention, which emphasize respect for human rights as integral to the organizational culture. **[S1-1 20 a]**

Violence and Harassment Policy

Principia has a comprehensive policy, "Violence and Harassment Policy", that aims at the prevention and elimination of violence and harassment in the workplace. This policy establishes a culture that rejects and does not tolerate any form of harassment, discrimination, or violence. It promotes equal opportunities for all employees, fostering diversity and inclusion across all levels of the organization. Moreover, it is designed to create an environment where employees are treated with dignity, respect, and fairness, ensuring that everyone has access to opportunities without any form of discrimination or bias. **[S1-1 24 a]**

The policy specifically covers a wide range of discrimination grounds, including but not limited to racial and ethnic origin, color, sex, sexual orientation, gender identity, disability, age, religion, political opinion, and national origin. These forms of discrimination are explicitly addressed in the policy, ensuring compliance with Union regulations and national laws. Principia acknowledges the importance of upholding human rights and strives to provide an environment where all employees can work free from discrimination or harassment based on any of these factors. **[S1-1 24 b, AR 15, AR 16]**

Additionally, the Group demonstrates a strong commitment to inclusion and positive action for individuals from Groups at particular risk of vulnerability. The "Violence and Harassment

Remedy for human rights infringements

Additionally, to address potential human rights impacts within its own workforce, the Group's policy includes measures to provide or enable effective remedies. Through established processes, employees are encouraged to report grievances, incidents, or breaches of human rights via appropriate channels. The Group undertakes due diligence to identify risks, implement corrective actions, and monitor compliance with human rights standards to ensure continuous improvement and accountability. **[S1-1 20 c]**

Policy" aims to create an inclusive work environment where all employees, regardless of background or characteristics, can thrive. Principia ensures that underrepresented and vulnerable Groups are supported through various programs and initiatives, and efforts are made to provide them with equal opportunities in the workplace. This includes targeted actions to prevent exclusion and promote diversity within the workforce. **[S1-1 24 c]**

The Policy is supported by clear procedures designed to prevent, mitigate, and act upon discrimination once detected. These procedures include regular awareness campaigns that emphasize the importance of diversity, inclusion, and mutual respect in the workplace. Employees receive comprehensive training on identifying, preventing, and addressing discrimination and harassment. In addition, Principia has established an accessible and confidential reporting system that allows employees to raise concerns without fear of retaliation. Once a report is made, the Group follows a thorough and impartial investigation process to address the issue. Any violations of the policy are dealt with through appropriate disciplinary measures, which can include warnings or termination, depending on the severity of the misconduct. Furthermore, Principia continually promotes these procedures to ensure that all employees are aware of their rights and responsibilities in preventing discrimination. **[S1-1 24 d]**

Human Rights Policy

The Group's "Human Rights Policy" highlights its commitment to create a working environment where all employees are treated with respect and equality. It emphasizes the protection of individual rights, including the right to fair working conditions, health and safety, non-discrimination, and inclusion. The policy also acknowledges the importance of providing just and favorable working conditions, such as maximum working hours, rest periods, and annual paid leave, ensuring the well-being of its workforce. **[S1-1 20]**

Principia explicitly rejects all forms of forced or compulsory labor, human trafficking, and child labor within its operations. In alignment with ILO Conventions No. 29 and No. 138, the policy mandates compliance with legal minimum working age requirements and ensures that no child labor is practiced. Moreover, the Group prohibits confiscation of money or identity documents to safeguard workers from exploitation or coercion. **[S1-1 22]**

This policy is firmly aligned with internationally recognized frameworks and principles. Specifically, the policy reflects the UN Guiding Principles on Business and Human Rights, adopting the «Protect, Respect, and Remedy» framework to address human rights impacts. Additionally, it incorporates key international standards, including the International Bill of Human Rights, the ILO Core Conventions (Nos. 29, 87, 98, 105, 111, 138, and 182), and the United Nations Convention on the Rights of the Child. **[S1-1 21, AR 12]**

Human Rights Risk Management Policy in Supply Chain

The "Human Rights Risk Management Policy in the supply chain" outlines the Principia's dedication to address and mitigate social and labor-related risks, particularly those involving forced labor, child labor, and discrimination. This policy emphasizes the Group's commitment to guarantee that the critical suppliers and their associated contractors adhere to international human rights standards. Principia holds suppliers accountable through a thorough pre-qualification process and regular monitoring. Moreover, the policy incorporates measures like risk mapping, digital traceability systems, and contractual commitments that strengthen the ethical standards within the supply chain. Suppliers are expected to provide detailed documentation, including supply chain mapping, and comply with digital systems ensuring traceability to the raw materials level. Regular audits and performance reviews are also integrated to ensure that the supply chain is ethically sound and free from human rights violations.

Furthermore, the policy includes a robust structure for auditing and monitoring human rights performance, with specific actions required in the event of non-compliance. The HRSCC is responsible for overseeing these efforts and ensuring continuous improvements in human rights practices within the supply chain. HRSCC also plays a critical role in addressing human rights violations by conducting audits, proposing corrective actions, and ensuring that corrective measures are implemented effectively. The suppliers' performance is tracked, and any deficiencies are identified for further mitigation. **[S1-1 20] [S1-1 23]**

Whistleblowing Policy

Throughout this policy Principia has implemented a comprehensive process for managing whistleblower reports. This process ensures the protection of whistleblowers, including confidentiality, non-retaliation, and the assurance that reports are handled with integrity. The policy applies to all individuals associated with the Group, including employees, contractors, and external stakeholders¹⁶, allowing them to report violations confidentially through various channels. The Group guarantees a thorough review process with proper protection for whistleblowers against any form of retaliation, reinforcing their commitment to uphold ethical conduct and transparency across all operations.

IMS Policy

The Integrated Management System (IMS) Policy outlines Principia's commitment to ensuring the health and safety of its workforce by adhering to the best available practices and technologies. The policy emphasizes the importance of zero safety and environmental accidents, and it aligns with the international standards ISO 9001, ISO 14001, and ISO 45001. Through the implementation of an integrated risk management system, the Group commits to continuous risk assessment, staff training, and the adoption of safe work practices to safeguard employees' well-being. The policy also highlights the focus on fostering a culture of health and safety across all operations, aiming to reduce occupational health risks and improve psychological and physical well-being. Additionally, it outlines the responsibility of all employees to be involved in and contribute to maintaining a safe working environment, through active participation and compliance with established health and safety procedures. **[S1-1 23]**

Stop Work Policy

The Group has adopted a «STOP WORK» Policy, which empowers employees to halt any activities that pose an immediate risk to health or safety. The management system is specifically designed to prevent and mitigate health and safety events within the workplace, adhering to internationally recognized standards. Furthermore, this system is certified according to ISO standards, which ensures its continuous improvement and alignment with best practices in health and safety management.

This policy forms an integral part of the broader health and safety management system. It focuses on safeguarding health, safety, and environmental protection. It requires employees to stop any work that may endanger health, safety, or the environment, without fear of consequences. Employees are encouraged to report unsafe practices immediately, and the responsibility for ensuring safe work is attributed to the person who halts the unsafe activity. **[S1-1 23]**

Communication with our employees

Principia engages its workforce through direct communication and structured practices aimed at fostering inclusion, equality, and open dialogue. Leadership commitment to Diversity & Inclusion (D&I) initiatives is communicated clearly to employees, ensuring alignment with organizational objectives. Regular interactions such as HR Chats, 1-on-1 meetings, and feedback surveys provide employees with opportunities to voice their concerns and contribute ideas for improving workplace culture. Structured hiring practices with standardized evaluation criteria ensure equal opportunity for all candidates, while ongoing training initiatives focus on unconscious bias and inclusive practices. Furthermore, the Group promotes employee engagement through climate surveys and evaluation meetings to continuously assess and enhance workforce involvement in organizational goals and values. **[S1-1 20 b]**

Processes for engaging with employees ^[S1-2]

Principia incorporates the perspectives of its workforce in managing actual and potential impacts through regular feedback mechanisms. Employees are encouraged to provide input on a variety of matters, including diversity and inclusion, risk management, and improvements in work environment. This feedback is collected through multiple channels, such as surveys, suggestion systems, and open dialogues during performance reviews and career development discussions. **[S1-2 27, AR 21, AR 23, AR 24]**

Specifically, employee engagement occurs at several stages of their employment with the Group, starting from **Onboarding**, where new employees are introduced to the Group's mission, values, and policies related to diversity, inclusion, and the work environment. **Continuous feedback** is encouraged through ongoing surveys and suggestion systems. Engagement also takes place during regular **Performance and Development** sessions, such as **HR Chats**, 1-on-1 meetings, and career development discussions. Employees participate in **Awareness Seminars** on key topics like unconscious bias and workplace harassment. **Surveys** are conducted regularly, including **Ad-Hoc surveys** triggered by organizational changes, to assess engagement levels and gather feedback on various issues. **[S1-2 27 a] [S1-2 27 b, AR 19]**

The responsibility for ensuring employee engagement lies with the **Chief People, Culture & Sustainability Officer** (Eugenia Melea). This senior role is accountable for overseeing the implementation of engagement strategies and ensuring alignment with the Group's overall objectives. The officer makes sure that engagement activities are integrated into the organizational culture and that employees' perspectives are

captured and acted upon to foster a positive work environment. **[S1-2 27 c, AR 18, AR 19]** Principia assesses the effectiveness of its workforce engagement through a structured evaluation process that includes periodic reviews of key performance indicators (KPIs) related to engagement activities. These KPIs are aligned with the Group's objectives and include the aforementioned metrics – the completion rates of feedback surveys, the quality of feedback received, and the alignment of engagement initiatives with overall organizational goals. Moreover, Principia tracks the outcomes of its engagement programs, including the number of issues raised, actions taken, and resolutions achieved. **[S1-2 27 e]**

The Group takes proactive steps to ensure the perspectives of vulnerable and marginalized Groups within its workforce are captured and considered. It actively seeks feedback from these Groups through **targeted surveys**, engagement activities, and **listening channels** like HR Chats and 1-on-1 meetings. Additionally, the Group ensures that its policies and training initiatives, such as **Awareness Seminars**, are inclusive and address the unique challenges faced by these Groups. Principia's commitment to diversity, including support for people with disabilities, women, and migrants, is reflected in its ongoing efforts to create an inclusive environment where all employees have a voice. **[S1-2 28]**

Principia does not have a Global Framework Agreement or any other agreements with workers' representatives specifically regarding respect for human rights within the workforce. **[S1-2 27 d, AR 20]**

Channels to raise concerns ^[S1-3]

To promote a fair, respectful and transparent workplace Principia prioritizes the well-being of our workforce throughout the Whistleblowing Policy and the comprehensive processes to address any situations where our operations may inadvertently cause material negative impacts on our employees. In the event that the Group causes a material negative impact, it adopts a proactive and structured approach through **Whistleblowing Channels** to ensure swift and effective remedies. With this approach, the Group aims to not only address individual grievances, but also create a culture where employees feel supported, respected, and empowered to voice their concerns. **[S1-3 32 a, AR 27] [S1-3 32 c]**

To foster open communication, Principia provides accessible channels for all employees to raise concerns, share ideas, or express their needs. To this end, we have developed a dedicated tool called «Insights & Observations», designed to empower our workforce with a user-friendly and transparent mechanism for sharing their feedback. This tool has been established by Principia to provide a direct, anonymous channel through which employees can confidently report issues or raise concerns, ensuring that they are addressed appropriately. **[S1-3 32 b, AR 28]**

It is important to highlight that the «**Insights & Observations**» tool is an anonymous platform that allows employees to share their concerns safely and confidently. All submissions are tracked through a secure management system, where they are logged, assessed, and directed to the appropriate teams for resolution. Anonymity ensures that employees can express themselves freely, and we inform our workforce about the tool through **Onboarding**. **[S1-3 32 d] [S1-3 32 e, AR 32]**

All Policies mentioned are **in place to protect individuals** who use the grievance and reporting mechanisms from any form of retaliation. Principia maintains a zero-tolerance stance toward retaliation, ensuring that employees who raise concerns or report issues in good faith are protected. These policies are clearly communicated to employees, and they are assured that any concerns raised will be handled confidentially, with appropriate action taken to address any retaliation. **[S1-3 33]**



Actions ^[S1-4]

Principia takes proactive steps to prevent and mitigate negative impacts on its workforce. Key actions include **regular updates to workplace policies** focusing on areas such as discrimination, harassment, and health and safety. Additionally, **Proactive Risk Assessments** are conducted to identify potential risks early on and internal audits are conducted regularly in order to monitor compliance. The Group also closely monitors **turnover data, grievances, and absenteeism** to detect any patterns that may indicate underlying issues. To further mitigate risks, the Group has introduced programs for **mental health and wellness support** and offers flexible work arrangements to address work-life balance challenges. **[S1-4 37]**

The effectiveness of the Group's actions and initiatives is tracked through **engagement surveys** that measure satisfaction, morale, and alignment with Principia's values. Feedback surveys are used to assess the effectiveness of both internal and external training programs. Principia also tracks **participation rates** in various initiatives, such as training programs, wellness initiatives, and diversity events, to gauge engagement and outcomes. **Turnover rates**, particularly among high performers and underrepresented Groups, are monitored to assess workplace inclusivity and satisfaction. **Exit interviews** provide valuable insights into reasons for leaving, which are used to further improve employee retention strategies. **[S1-4 38 d, AR 38, AR 39] [S1-4 38 c, AR 42]**

The Group plans to pursue material opportunities for its workforce through continued focus on **employee development, talent retention**, and **diversification** of skills. Initiatives such as **internal career development programs, mentorship**, and **leadership training** are designed to provide employees with career advancement opportunities. Furthermore,

Principia plans to expand **remote work policies** and provide more **digital collaboration tools** to support flexible work arrangements. **[S1-4 40 b]**

The Group assures that its practices do not cause or contribute to material negative impacts on the workforce by adhering to robust **IMS Policy, discrimination and harassment prevention programs**, and **compliance with labor laws**. Regular **audits** and **reviews of workplace policies** ensure alignment with best practices, and the Group continuously evaluates its impact on the workforce's well-being. **[S1-4 41, AR 37]**

Mitigation actions

Principia has taken several actions to provide remedies for any material impacts on its workforce. These include establishing **unbiased hiring practices**, such as **blind resume reviews** and **interview panels**, to guarantee equal opportunities for all employees. Furthermore, the Group ensures **equitable access to training, mentorship**, and **promotion opportunities**, helping employees advance in their careers. **Anonymous and accessible channels** have been established for employees to report concerns or grievances without fear of retaliation. **Strengthened HR processes** ensure that complaints are resolved in a timely and impartial manner, providing remedies when necessary. **[S1-4 38 a, AR 42]**

The Group continues to implement initiatives designed to deliver positive impacts for its workforce. These include **continuous learning opportunities** through workshops, certifications, and training, aimed at enhancing employees' skills and career prospects. Principia also offers **fitness programs** and organizes **wellness days** and **mental health awareness campaigns** to promote well-being. **Peer-to-peer recognition, team-building activities**, and **expanding flexible work options** all contribute to

a collaborative and inclusive work environment. Additionally, the Group aligns its workforce practices with broader **ESG goals**, fostering a sense of purpose and shared mission, and continually measures the success of these initiatives through employee engagement scores. **[S1-4 38 b]**

The Group has a structured process for identifying the necessary actions to address potential or actual negative impacts on its workforce. This process begins with the regular **risk assessments**, the **employee surveys**, and data analysis to detect any emerging issues related to workforce well-being. **Turnover rates, grievances, and absenteeism data** are closely monitored to identify trends that may indicate underlying problems. Once an issue is identified, the **HR team** works closely with senior leadership to determine the appropriate actions, such as offering remedies, adjustments, or further support for affected employees. Additionally, the Group consults with external experts when necessary to ensure that the actions taken are effective and aligned with best practices. **[S1-4 39, AR 34]**

Principia is continuously evaluating and addressing risks arising from its workforce dependencies through several proactive measures. Actions planned include investing in wellness programs to reduce absenteeism and improve long-term employee health and productivity. The Group aims to foster work-life balance by expanding flexible work options. Reskilling and upskilling employees is a priority to ensure that the workforce remains adaptable to emerging job requirements. Effectiveness is tracked through employee engagement surveys, monitoring of absenteeism rates, and assessments of employee satisfaction and health indicators to evaluate improvements in workforce well-being. **[S1-4 40 a, AR 44, AR 45, AR 47]**



METRICS AND TARGETS

Targets [S1-5]

The Group’s annual targets for the workforce are structured within a framework based on three core pillars: **Financial, Business, and Safety & Sustainability**. These pillars are aligned with the organization’s overarching goals, ensuring that employees contribute to the broader success of the Group. **Financial** and **Safety & Sustainability** targets apply universally to all employees, to guarantee consistency across the workforce. The **Business** pillar, however, is tailored to each employee’s role and responsibilities, reflecting their specific job description. The process of setting targets involved active participation from **departmental representatives**, who worked closely with the **HR department** to outline specific, achievable targets for their team members. These targets were reviewed and finalized in consultation with the **Chief of their respective committees**, ensuring alignment with overall business goals and individual responsibilities. [S1-5 46, AR 50, AR 51, AR 52]

The involvement of workforce representatives in setting targets is a critical component of the Principia’s approach. Representatives, as part of the target-setting process, collaborated with the **HR department** to define specific targets tailored to their team’s responsibilities. Their direct involvement included outlining performance goals, which were then reviewed with the relevant leadership to ensure alignment with departmental objectives and business outcomes. This participatory process ensures that targets are both relevant and achievable while aligning with the overall strategic objectives of Principia. [S1-5 47 a]

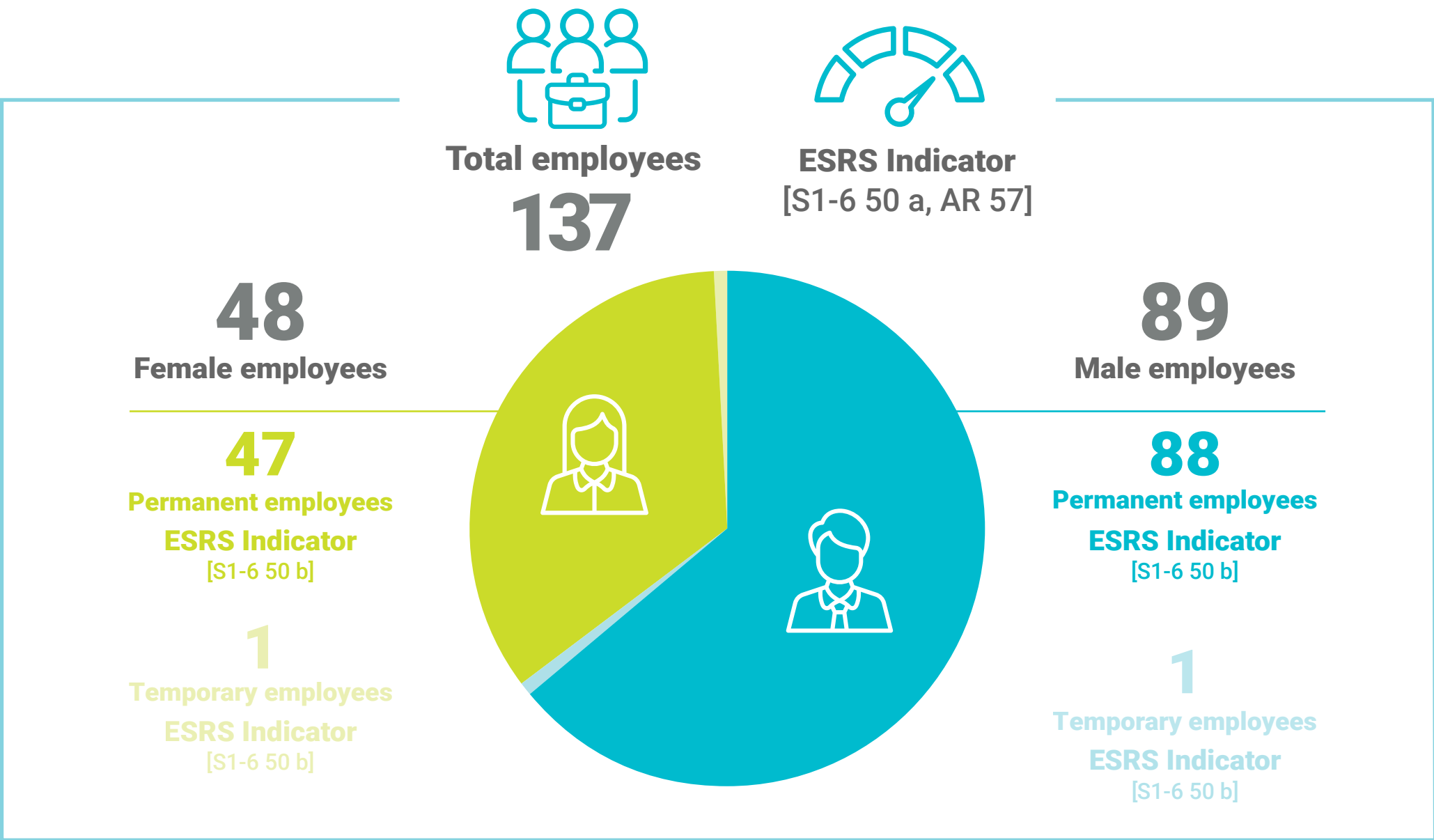
Additionally, the workforce representatives are directly involved in tracking performance

against the established targets. The **HR department** conducts bi-monthly consultations with representatives to gather feedback on performance progress relative to these targets. These consultations help to ensure accurate tracking and facilitate continuous dialogue about challenges or obstacles encountered. Additionally, representatives engage in discussions with employees to identify areas for improvement, ensuring that lessons learned are applied to future performance goals. The **HR department** also collaborates with representatives to review the outcomes prior to the disbursement of bonuses, providing opportunities for representatives to engage in one-on-one discussions with employees. This open line of communication fosters **transparency** and allows the Group to make necessary adjustments to strategies, ensuring continuous improvement based on workforce feedback. [S1-5 47 b] [S1-5 47 c]

Metrics - Characteristics of the undertaking’s employees [S1-6]

The employee data used for turnover reporting is sourced directly from our **HR management system**. This data is reported in “**Head Count**” as a reflection of the average monthly workforce from **January 2024 to December 2024**. The methodology ensures that the total number of employees leaving and joining is tracked consistently, providing an accurate reflection of turnover trends. [S1-6 50 d(i)] [S1-6 50 d(ii)] [S1-6 50 e, AR 58]

The table below presents data on the characteristics of the Group’s employees for the year 2024, including total employees, gender distribution, and the breakdown of permanent and temporary employees by gender:



Turnover	ESRS Indicator	Unit	2024
Rate of turnover	[S1-6 50 c]	%	22%
Total turnover	[S1-6 50 c, AR 59]	No.	30

Metrics – Characteristics of non-employee workers [S1-7]

The non-employees working with Principia are Contractors and Subcontractors personnel who contribute to Principia’s construction and operation and maintenance activities. In 2024, data on other non-employees categories working with Principia is not available. However, in 2025, the Group implemented a structured process to track and report this data.

The non-employee data for 2024 is compiled using monthly man hours sourced from the Contractors and Subcontractors. This data represents the actual worked hours, not headcount or full-time equivalents. The worked hours are tracked and reported monthly as part of the Health and Safety (H&S) / Susceptibility (SUS) reporting process. This method allows for an accurate measurement of labor hours and activities contributed by non-employees.

Principia reports the number of non-employees based on headcount, with a total of 300 individuals recorded for the reporting year. Additionally, contractor workforce data is measured in total man-hours, which amounted to 168.276 for 2024. The non-employee numbers are reported as of the end of the reporting period. These figures are compiled using internal tracking systems that account for contractors and other non-employee workers engaged in the Group’s operations. [S1-7 55 b] [S1-7 55 b(i)] [S1-7 55 b(ii)] [S1-7 55 c, AR 64, AR 65] [S1-7 57, AR 63]

The table below presents data on the number of non-employees in the Group’s own workforce:

Characteristics of the Group’s employees		
Number of non-employees in own workforce		
ESRS Indicator	Unit	2024
[S1-7 55 a]	No	300

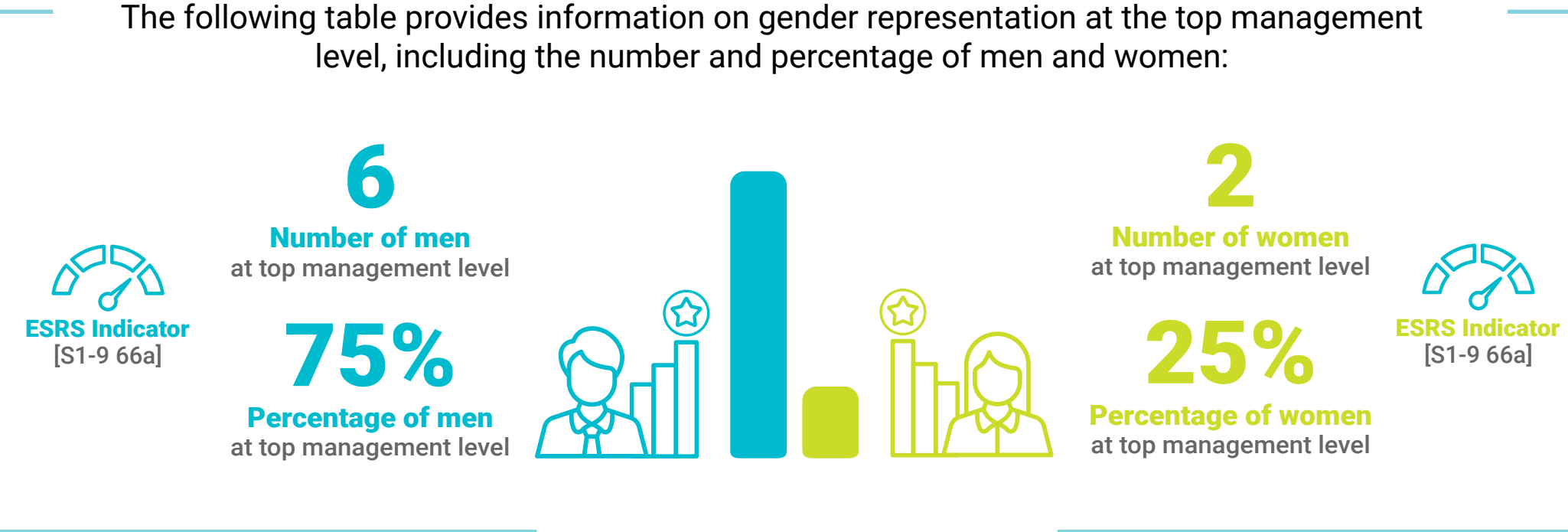
Metrics – Collective bargaining coverage and social dialogue [S1-8]

Principia does not have any representation agreements as an organization in compliance with the European Works Council (EWC), Societas Europaea (SE) Works Council, or Societas Cooperativa Europaea (SCE) Works Council. [S1-8 63 b]

Metrics – Diversity [S1-9]

The Group defines «top management» in its reporting and communications as comprising key executive roles responsible for strategic decision-making and overall leadership. This includes the Chief Executive Officer (CEO), who oversees the Group’s vision and operations, the Chief Financial Officer (CFO), responsible for financial strategy and management, the Chief People, Culture & Sustainability Officer,

who leads initiatives related to human resources, corporate culture, and sustainability, the Chief Commercial Officer, managing commercial strategy and business development, the Chief Operations Officer, overseeing operational performance and efficiency and the Head of Legal & Corporate Affairs, who ensures legal compliance and corporate governance. [S1-9 AR 71]



The table below details the age distribution of employees, categorized into three age Groups:

Diversity	ESRS Indicator	Unit	2024
<30 aged employees	[S1-9 66 b]	No.	12
<30 aged employees	[S1-9 66 b]	%	9
30-50 aged employees	[S1-9 66 b]	No.	120
30-50 aged employees	[S1-9 66 b]	%	88
>50 aged employees	[S1-9 66 b]	No.	5
>50 aged employees	[S1-9 66 b]	%	4

Metrics – Adequate wages [S1-10]

The Group ensures that all employees receive an adequate wage, consistent with applicable benchmarks or standards. [S1-10 69, AR 72, AR 73, AR 74]

The table below presents data on adequate wages for the year 2024:

Adequate wages		
Percentage of employees that earn below the applicable adequate wage benchmark		
ESRS Indicator	Unit	2024
[S1-10 70]	%	0%

Metrics – Social protection [S1-11]

At Principia all employees are covered by social protection, including sickness, unemployment benefits, employment injury, acquired disability, parental leave, and retirement, either through public programs or company-provided benefits. [S1-11 74 a, AR 75] [S1-11 74 b, AR 75] [S1-11 74 c, AR 75] [S1-11 74 d, AR 75] [S1-11 74 e, AR 75]

In the countries where the Group operates, all employees are fully covered by social protection, ensuring they are protected against income loss due to sickness, unemployment, employment injury, acquired disability, parental leave, and retirement. There are no identified categories of employees who are excluded from these protections, ensuring comprehensive coverage for all employees across our operations. [S1-11 75] [S1-11 76, AR 75]

Metrics – Persons with disabilities [S1-12]



Metrics – Training and skills development [S1-13]

The table below presents data on training and skills development:

Training and skills development	ESRS Indicator	Unit	2024
Male employees that participated in regular performance and career development reviews	[S1-13 83 a, AR 77]	No.	89
Female employees that participated in regular performance and career development reviews	[S1-13 83 a, AR 77]	No.	48
Other gender employees that participated in regular performance and career development reviews	[S1-13 83 a, AR 77]	No.	0
Number of reviews in proportion to the agreed number of reviews by the management	[S1-13 83 a, AR 77]	Rate	100
Average number of training hours per male employee	[S1-13 83 b, AR 78]	No.	31
Average number of training hours per female employee	[S1-13 83 b, AR 78]	No.	35
Total average number of training hours per employee	[S1-13 83 b, AR 78]	No.	33
Average number of training hours per other gender employee	[S1-13 83 b, AR 78]	No.	0

Metrics – Health and safety [S1-14]

The following table presents key health and safety indicators for the year 2024, including data on work-related incidents, lost workdays, and the coverage of health and safety management systems within the workforce:

Health and safety	ESRS Indicator	Unit	2024
Fatalities as a result of work-related injuries or work-related ill health (for own employees)	[S1-14 88 b, AR 82, AR 89, AR 90, AR 91]	No.	0
Number of fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites	[S1-14 88 b, AR 82, AR 89, AR 90, AR 91]	No.	0
Recordable work-related accidents	[S1-14 88 c, AR 89, AR 90, AR 91]	No.	0
Recordable work-related ill health	[S1-14 88 d]	No.	0
Days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health	[S1-14 88 e, AR 95]	No.	0
Percentage of recordable work-related accidents	[S1-14 88 c, AR 89, AR 90, AR 91]	%	0%
Percentage of people in its own workforce who are covered by health and safety management system based on legal requirements and (or) recognized standards or guidelines	[S1-14 88 a, AR 80]	%	100%

Metrics – Compensation [S1-16]

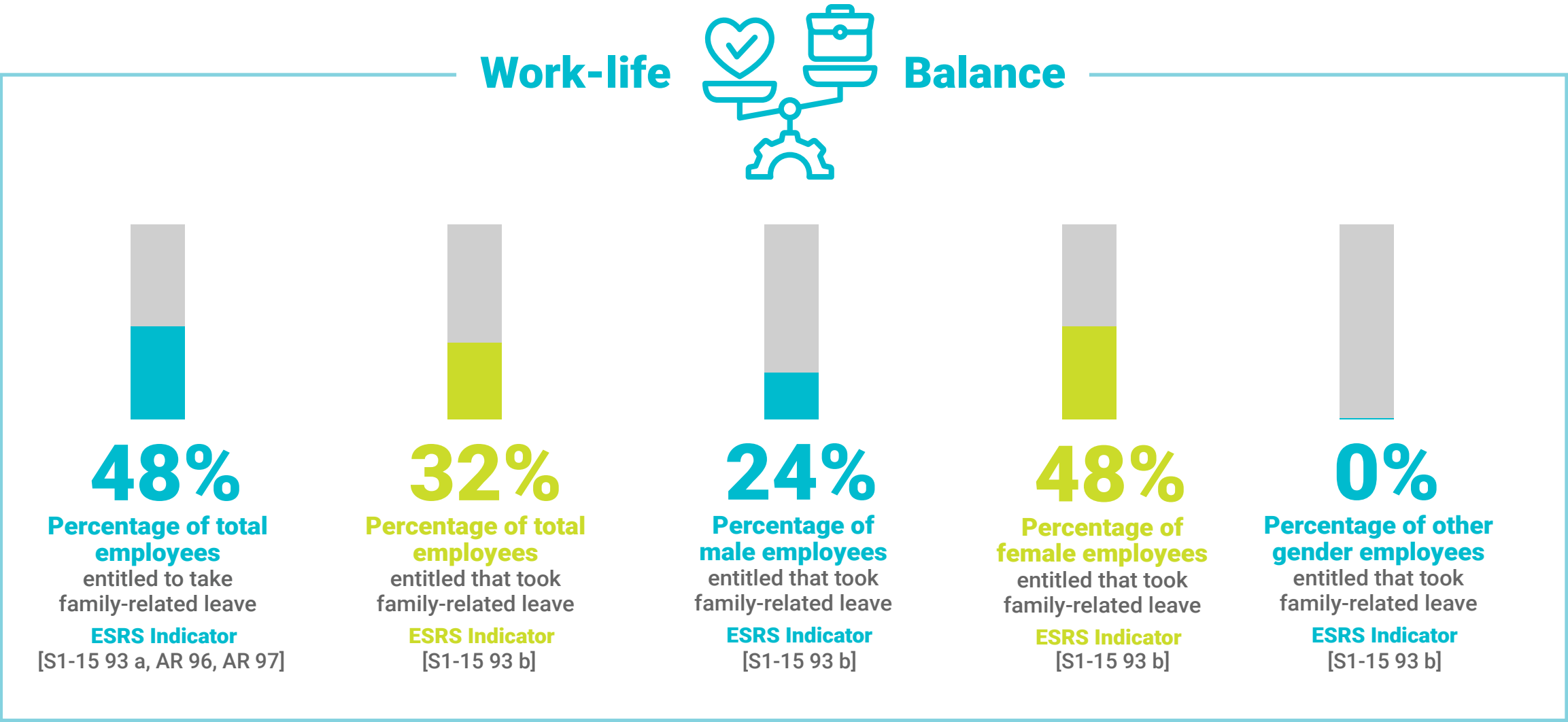
Principia calculates the pay gap by comparing earnings across specific demographic Groups, with gender being one of the primary categories considered. This allows for the identification of any disparities in compensation between different employee Groups. Total compensation, on the other hand, encompasses all earnings, including base salary and bonuses. The frequency of reporting varies depending on the needs of the Group, and the data may be presented annually, quarterly, or monthly.

All calculations related to compensation metrics are performed directly by the HR department, using an Excel spreadsheet that incorporates the calculation formula. This ensures that the data is accurate and consistently reflects the total compensation structure within the organization. **[S1-16 97 c, AR 99, AR 102]**

Metrics – Work-life balance [S1-15]

Family-related leaves are not associated with any collective bargaining agreements within the Group. However, all employees are entitled to family-related leave, in line with the current legislation. Employees with children are entitled to parental leave, which includes maternity, paternity, and parental leave, as per the applicable legal framework. **[S1-15 94]**

The table below presents key work-life balance indicators for the year 2024, including the percentage of employees entitled to and utilizing family-related leave, with a breakdown by gender:



Gender equality and equal pay for work of equal value	ESRS Indicator	Unit	2024
Gender pay gap	[S1-16 97 a, AR 98, AR 99, AR 100]	%	17%
Annual total remuneration ratio	[S1-16 97 b, AR 101]	Rate	8

Metrics – Incidents, complaints and severe human rights impacts ^[S1-17]

Principia confirms that no incidents of work-related discrimination and harassment have occurred. As a result, there have been no fines, penalties, or compensation claims for damages related to such violations. Additionally, there have been no grievances, incidents, or complaints regarding social and human rights matters within the Group. Therefore, no further reconciliation or compilation of data concerning work-related discrimination and harassment has been necessary. **[S1-17 103 c, AR 103, AR 104, AR 105, AR 106]**

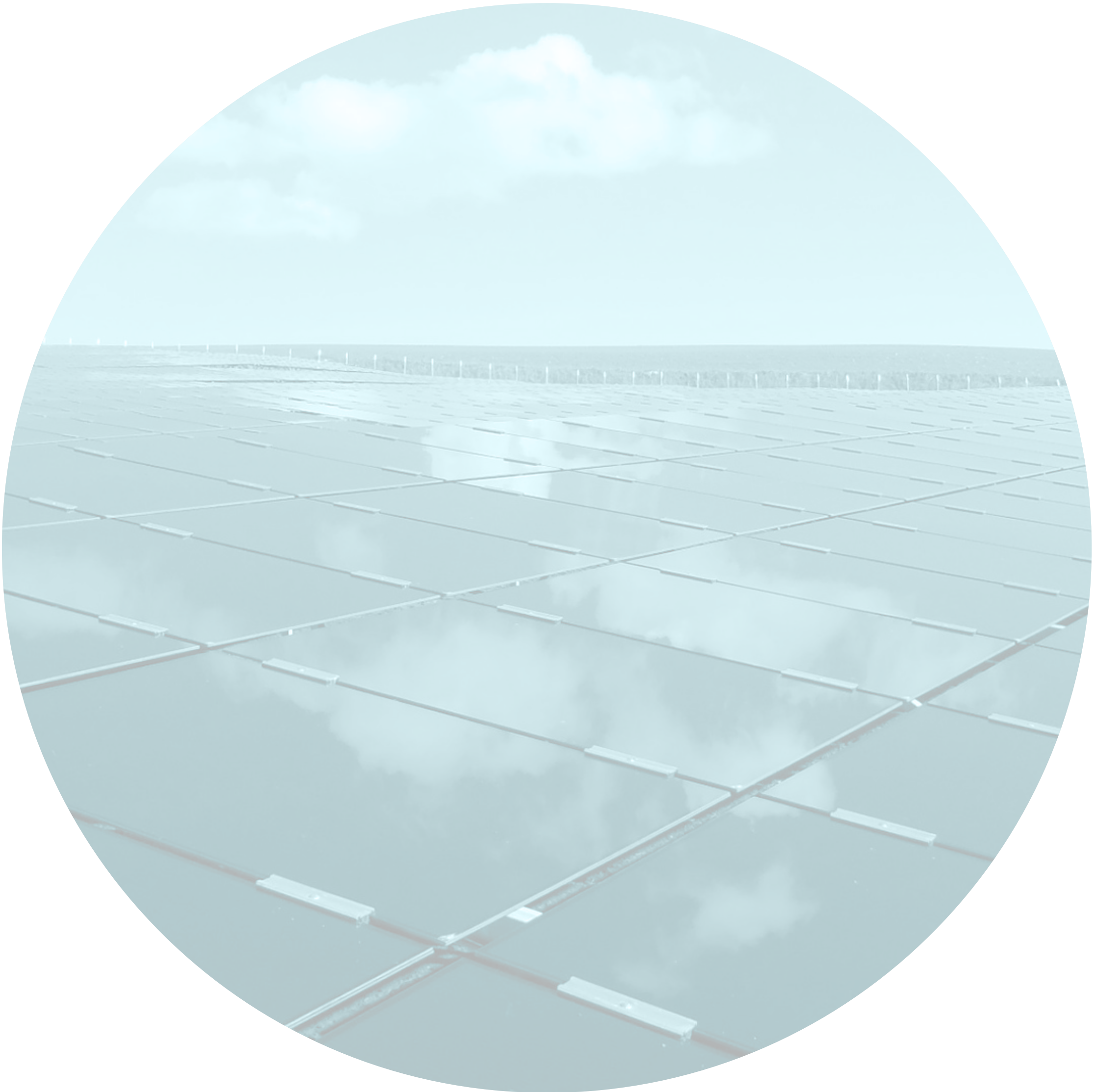
The Group has had no incidents of violations related to work-related discrimination and harassment. As a result, there have been no fines, penalties, or compensation for damages related to such incidents. Principia’s grievance and incident handling processes are designed to prevent and address any potential violations in a timely and effective manner. Since no incidents have occurred, the Group has not been involved in reconciling fines or compensation amounts for these types of violations. **[S1-17 104 b, AR 103, AR 104, AR 105, AR 106]**

The table below covers measures against violence and harassment in the workplace, including incidents of discrimination, complaints filed, and related financial penalties:

Measures against violence and harassment in the workplace	ESRS Indicator	Unit	2024
Severe human rights incidents connected to the Group’s workforce	0	No.	0
Number of severe human rights issues and incidents connected to own workforce that are cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises	0	No.	0
Fines, penalties and compensation for damages for the incidents described above	0	Million €	0

The following table provides data on human rights violations, including severe incidents, adherence to international guidelines, and any associated fines or compensations:

Human right violations	ESRS Indicator	Unit	2024
Severe human rights incidents connected to the Group’s workforce	0	No.	0
Number of severe human rights issues and incidents connected to own workforce that are cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises	0	No.	0
Fines, penalties and compensation for damages for the incidents described above	0	No.	0

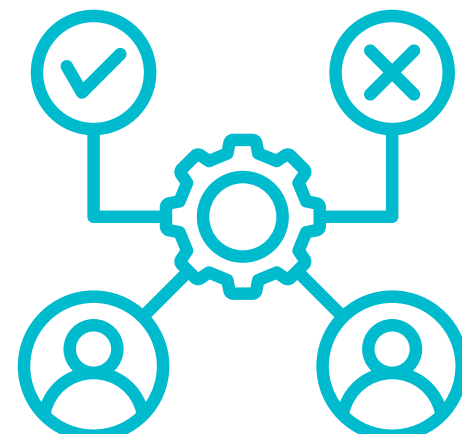


**Affected
communities** [s3]



 **principia**

STRATEGY



Material impacts, risks and opportunities [SBM-3]

Positive impacts

At Principia, oversight of business conduct is a fundamental pillar of ethical practices. The Group's governance structure is designed to promote transparency and accountability at every level, while the Board of Directors meets monthly to evaluate and make decisions on key agenda items for the Group's four primary companies. This consistent engagement enables oversight of strategic initiatives and operational matters, ensuring that business practices adhere to the Group's ethical and operational standards. Moreover, significant issues impacting the Group are governed centrally by Principia S.A., in accordance with the internal Shareholders Agreement (SHA). **[GOV-1 5 a]**

Further, Principia benefits from the expertise of its administrative, management, and supervisory bodies in addressing business conduct matters. The Board of Directors further strengthens this framework with its diverse experience and deep understanding of strategic governance, operational oversight, and ethical business practices. Collectively, these capabilities ensure the effective management of business conduct across all companies within the Group. **[GOV-1 5 b]**

Principia actively engages in activities that generate positive impacts for local communities, fostering both social and environmental well-being. These activities include a range of initiatives designed to address community needs and create shared value. Donations, whether in the form of cash or goods,

provide essential support to local causes and help address pressing social issues. Additionally, the Group urges the employees to volunteerism by contributing their time and skills to strengthen connections with the communities in which they operate.

Beyond philanthropic contributions, the organization prioritizes sustainable community investments and commercial initiatives with social impact, such as sponsorship programs. These efforts support local development and are completely aligned with the Principia's strategic goals. Environmental initiatives, such as reforestation projects, play a dual role by restoring ecosystems and engaging local communities in environmental stewardship. Furthermore, the Group actively procures services and goods from the local community and hires local contractors, boosting the local economy and supporting livelihoods.

Through these diverse activities, Principia positively impacts various communities, including underserved populations, small local businesses, and areas affected by environmental degradation. These efforts are focusing on the specific needs of the communities. **[SBM-3 9 c]**

Negative impacts

Understandably, the operation of renewable energy facilities may cause disturbances such as noise, visual impacts, or changes to the surrounding landscape, that may potentially affect the quality of life and well-being of nearby residents. This poses

several risks to Principia, including mid-term increased operating costs related to addressing community grievances, such as legal fees and compensation payments as well as mid-term regulatory compliance costs related to the efforts and actions needed to comply with stricter regulations introduced in response to community concerns. **[SBM-3 9 d]**

Opportunities

Principia is creating a framework for stakeholder engagement and strategies to identify and address the needs of the local community. This framework includes an annual Creating Shared Value (CSV) plan with specific actions and communication initiatives. Such robust planning and stakeholder engagement may enhance the Group's reputation, ultimately driving revenue growth through the successful implementation of renewable energy projects. Moreover, engagement with the local community may familiarize Principia with several unmet needs and market gaps, bringing up increased opportunities for innovative products and services to address those, and ultimately creating additional revenue streams. The opportunities mentioned, are considered to have mid-term effects regarding the Group's time horizon. Additionally, when choosing locations for new projects, Principia prioritizes environmental preservation and actively supports the communities where they operate through donations, and through hiring local personnel.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT



Policies ^[S3-1]

Principia has established a Sustainability Management policy that includes but is not limited to provisions on the management of impacts, risks, and opportunities related to affected communities. The involvement and inclusion of the local communities is a necessary part of its procedures. The stakeholders of the affected communities are identified and mapped during the Social Economic and Environmental Context Analysis (SEECA) study, and an engagement plan per stakeholder Group within the affected communities is prepared. Moreover, Principia's Human Rights Policy is also established, showcasing the Group's commitment to respecting the rights of local communities and to contribute to their economic and social growth. **[S3-1 14]**

Investing in local communities is crucial for Principia, as renewable energy projects are becoming more widely accepted. This is due to local stakeholders realizing the added tangible benefits that arise when a community hosts renewable energy initiatives. During the operational phase of each project, the relationship with the stakeholders is to be treated with utmost care. The Plant Supervisor acts as the main and first contact person for local stakeholders and is responsible for monitoring all meetings held with the Stakeholders, monitoring all requests and grievances that may arise and informing the Sustainability referent, responsible for addressing any feedback. At the time this report is being written, no remedial measures have been taken since no human right impacts have occurred so far. **[S3-1 16 b]**

There have been no occurrences or signs of non-

compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises involving affected communities. Moreover, Principia's Human Rights Policy is aligned with the following principles:

1. The International Bill of Human Rights of the United Nations (UN)
 - a) Universal Declaration of Human Rights.
 - b) International Covenant on Civil and Political Rights.
 - c) International Covenant on Economic, Social and Cultural Rights;
2. The core conventions of the international labour Organization (ILO)
 - no. 29, 87, 98, 100, 105, 111, 138, 182 - and the Declaration on fundamental Principles and Rights at Work.
3. The United Nations Convention on the Rights of the Child.
4. ILO Conventions no. 107 and no. 169 on the Rights of Indigenous and Tribal Peoples.
5. The European Convention on Human Rights.

Furthermore, Principia has also taken into consideration the latest versions of the following business standards and voluntary initiatives:

1. The UN Global Compact principles.
2. The Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises.
3. The ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.
4. The "UN Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' framework".
5. UN Declaration on Indigenous People.
6. The UK Modern Slavery Act 2015.
7. International Finance Corporation Stan. **[S3-1 16] [S3-1 17, AR 10]**

Remedy

As part of our sustainability strategy, we integrate human rights considerations into our operations and ensure that affected communities are safeguarded from any adverse impacts. A key component of our approach is the implementation of stakeholder engagement mechanisms that enable early identification of potential human rights risks.

Principia also maintains robust grievance mechanisms that allow affected communities to voice concerns, ensuring that any issues raised are addressed in a timely and transparent manner. Through the Creating Shared Value (CSV) initiatives, the Group actively promotes social inclusion, sustainable development, and equitable opportunities for local communities. **[S3-1 16 c]**

There are no incidents of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises. Principia maintains strict policies and governance mechanisms to uphold these standards across its operations and value chain. Regular monitoring and stakeholder engagement processes help us to ensure compliance and mitigate potential risks related to human rights violations. **[S3-1 17]**

Processes for engaging with affected communities ^[S3-2]

The interests, perspectives, and rights of affected communities are materially influenced by Principia's operations through its shared value creation model, which places community engagement at the core of its business strategy. The Group's approach emphasizes fostering collaboration and creating synergies between its needs and those of the communities across its value chain—spanning business development, construction, and the operation of renewable energy plants. Principia integrates a human rights perspective into its materiality analysis by identifying environmental, social, and governance topics that reflect its impact on communities. This approach ensures that its operations mitigate risks such as displacement, unequal access to resources, and environmental degradation. From the early stages of project development, Principia actively engages with communities to promote awareness of renewable energy's strategic role in decarbonization and highlight the mutual benefits of collaboration.

Insights gained from stakeholder interactions and materiality assessments shape Principia's sustainability plan, aligning business objectives with the interests of affected communities. These objectives address critical issues such as fair labor practices, local economic development, and environmental conservation, directly benefiting the populations in the areas where the Group operates. By embedding social responsibility into its project planning, Principia ensures that its operations contribute to equitable social outcomes, including access to clean energy, job creation, and educational opportunities. Open communication with stakeholders reinforces the Group's commitment to transparency and accountability, enabling the proactive identification and resolution of human rights concerns. Through its alignment with community rights and expectations, Principia not only minimizes negative impacts but also strengthens its role as a socially responsible player in renewable energy.

Principia aims to maintain a constant and direct engagement with the stakeholders of affected communities. With starting point the preliminary project assessment phase and prior to the Final Investment Decision (FID), during each project's development, Principia begins to engage directly with affected communities to ensure that a solid community engagement plan, aligned with a Creating Shared Value (CSV) approach, is in place and agreed upon with the community. Direct engagement takes several forms, such as surveys conducted with the assistance of external consultants, periodic meetings with stakeholders, and focus Groups organized within the local community. These focus Groups, that continue throughout the project's lifecycle, provide a platform for community members to interact with Principia's representatives, an action that fosters inclusivity and helps eliminate the risk of exclusion.

The engagement process is tailored to meet the needs of different stakeholder Groups and includes surveys to collect feedback, meetings to discuss project updates and address concerns, and focus Groups to facilitate direct communication. Surveys and meetings are conducted periodically, with their frequency determined by the project's phase and the needs of the community. Collaboration and mutual understanding is achieved through such activities that aim to create value for both the Group and the stakeholders directly or indirectly affected by the project. **[S3-2 21 a] [S3-2 21 b, AR 15]**

The Head of Sustainability holds the most senior position responsible for ensuring that community engagement is effectively implemented and is tasked with enabling consistent and transparent interaction with stakeholders. This role oversees the design, execution, and monitoring of engagement activities, to ensure their alignment with the Group's CSV vision and sustainability goals. The Head of Sustainability is tasked with ensuring that the Group

maintains a physical presence in the community, enabling consistent and transparent interaction with stakeholders. **[S3-2 21 c, AR 14, AR 15]**

The Group evaluates the effectiveness of its engagement with affected communities through:

- Feedback mechanisms: Analysis of survey results and input from focus Groups and meetings.
- Community sentiment analysis: Assessing the alignment between community expectations and project outcomes.
- Monitoring and reporting: Regularly reviewing engagement outcomes against predefined KPIs, such as stakeholder satisfaction, participation rates, and the resolution of grievances.
- Third-party assessments: Independent audits or reviews may be conducted to ensure objectivity and identify areas for improvement.

By maintaining open channels of communication and integrating stakeholder feedback into project planning and implementation, the Group aims to foster long-term value creation for both the organization and the communities it impacts. **[S3-2 21 d]**

As mentioned before, the perspective of affected communities is integral to managing actual and potential impacts during project development. A Social Context Analysis (SEECA) study, conducted in the early phases, involves extensive surveys with local affected communities to perform a materiality analysis to identify and assess both positive and negative impacts, while directly incorporating community feedback into project planning. The findings shape the development of a Creating Shared Value (CSV) plan, which outlines community-benefiting actions and is presented to the community for discussion and approval prior to implementation. **[S3-2 21, AR 16]**

Vulnerable communities

To gain insight into the perspectives of vulnerable or marginalized Groups, the SEECA process employs targeted outreach and culturally sensitive engagement methods to ensure inclusivity. Respect for the rights of indigenous peoples is embedded in the engagement approach through open dialogue and collaborative consultations. This practice ensures that their voices are heard and reflected in project decisions, aligning Principia's and the community's perspectives to promote fairness and mutual benefit. **[S3-2 23, AR 13]**

Principia implements a thorough Social, Economic, and Environmental Context Analysis (SEECA) at the early stages of project development to understand the perspectives of affected communities, particularly those that are vulnerable or marginalized. This study is conducted by specialized consultants who perform extensive surveys with local communities. The objective of SEECA is to conduct a comprehensive materiality analysis for the site or project under investigation, exploring both positive and negative, as well as actual and potential, impacts in detail.

Upon completion of the SEECA and during the basic technical design of the project, a Creating Shared Value (CSV) plan is developed. This plan proposes specific actions and projects aimed at benefiting the local community. The CSV plan is subsequently presented to and discussed with the community to obtain their views and approval prior to the commencement of the project. **[S3-2 22]**

Channels to raise concern ^[S3-3]

Principia has set mechanisms in place, in order to provide remedies when a material negative impact on affected communities is being identified. Such mechanisms are included in the Group's CSV plan, during the under-construction and operation phases, where communication with stakeholders is clearly defined as part of the process. During these phases, responsible for the relationship with stakeholders is the Sustainability (SUS) referent.

During the under-construction phase, the construction site manager acts as the main and first contact person for local stakeholders and is responsible for monitoring all meetings held with the Stakeholders and related to the construction site, registers all the requests for information, grievances by stakeholders, topic date and any other relevant information that can be useful. The SUS referent is then responsible for receiving and managing stakeholder's feedback, with the function of verifying the benefit of the sustainability practices implemented in the community in the broader area of the construction site and of measuring more generally the acceptance of the site by the community.

During the operational phase, the Plant Supervisor acts as the main and first contact person for local stakeholders and is responsible for monitoring all meetings held with the Stakeholders and related to the asses; registers all the requests for information, grievances by stakeholders, topic date and any other relevant information and maintenance a communication logbook of each asset. The Plant Supervisor shall inform the SUS referent promptly regarding any complaints or request received by the local stakeholders. The SUS referent, will be responsible for receiving and managing stakeholder's feedback, evaluating any requested and proposing any solutions in response to the received feedback. The proposed solutions shall be discussed jointly with Sustainability, Communication, Operation and Maintenance referent while in case costs in terms of OPEX are associated a detailed plan shall be provided to the CFO, COO and CPC&S for approval. The plan shall include a detailed description of the proposed actions,

the associated costs, the benefit for the community and relevant risks and opportunities.

Moreover, anyone that wishes to submit a report, anonymous or not, may fill the relevant form, that is available on the Group's website. Principia's Code of Ethics and Human Rights Policy, ensure that individuals that may utilize these channels will be protected from any retaliation. **[S3-3 27 a, AR 17, AR 22] [S3-3 27 b, AR 18] [S3-3 27 c] [S3-3 27 d, AR 24] [S3-3 28, AR 23] [S3-3 28, AR 23] [S3-3 28] [S3-3 29]**

Mitigation actions

As previously mentioned, Principia follows a structured and proactive approach to identifying, preventing, and mitigating material negative impacts on affected communities. This approach is embedded within the **Creating Shared Value (CSV) framework**, ensuring that social, economic, and environmental factors are systematically integrated into project planning and execution.

Specifically, during the development phase of a project, the Group adheres to the following steps to assess and address potential impacts:

- **Context Analysis of Local Communities (SEECA):** A SEECA is conducted at the early stages of project development to gather in-depth insights into the local communities. This includes extensive surveys and data collection to understand the socio-economic conditions, environmental risks, and cultural sensitivities of the affected areas.
- **Stakeholder analysis:** Principia engages directly with stakeholders to map out key concerns, expectations, and potential risks. This engagement allows for a participatory decision-making process, ensuring that the voices of affected communities—particularly marginalized and vulnerable Groups—are heard and considered in project planning.
- **Site materiality assessment:** A materiality analysis is conducted to identify and evaluate Impacts, Risks,

and Opportunities (IROs) related to the project. This analysis helps prioritize significant issues that may affect local communities, enabling targeted actions to mitigate adverse effects while also maximizing positive contributions.

- **Development of the CSV action plan:** Based on the findings of the SEECA, stakeholder engagement, and site materiality assessment, the Group formulates a CSV Action Plan. This plan outlines concrete measures to mitigate negative impacts and empower local communities, ensuring alignment with accountability requirements and industry best practices. The CSV Action Plan is then shared with community representatives for feedback and validation before project implementation. **[S3-4 32 a, AR 28, AR 29, AR 36]**

Principia follows a systematic process to identify and address these material negative impacts on affected communities. This process begins with the SEECA and the Site Materiality Assessment, which evaluate risks, opportunities, and potential adverse effects of the project. A key component of this approach is stakeholder consultation, where the CSV Plan – formulated based on the SEECA and materiality findings—is presented to the local community for feedback and approval before project commencement. This ensures that concerns and expectations are incorporated into project execution. In addition, CSV initiatives are usually implemented as partnership projects, involving NGOs, educational institutions, local social enterprises, and consultants. **[S3-4 33 a, AR 26]**

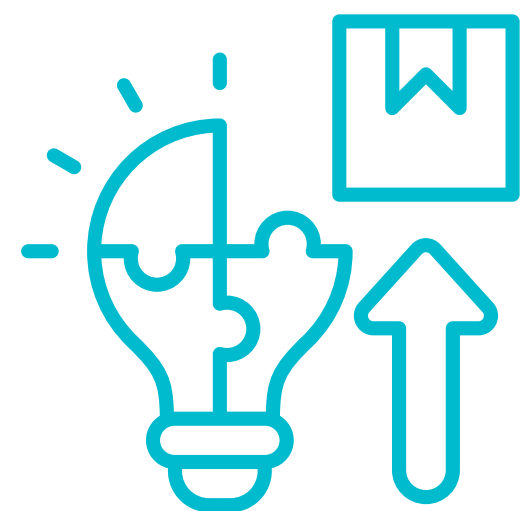
In order to address the aforementioned impacts, the Group is following the approach of **SEECA and Site Materiality Assessment** to identify material topics that inform the CSV strategy. The process includes developing targeted action plans based on identified material topics, allocating necessary resources to ensure the effective implementation of mitigation measures, and coordinating with local stakeholders and subject matter experts to align actions with community needs and expectations. **[S3-4 33 b]**

In 2024, for a mature Battery Energy Storage System (BESS) project, Principia conducted a SEECA, Site Materiality Assessment, and a Local Stakeholder Engagement Plan. Additionally, a CSV Plan was developed, including a Social & Environmental Action Plan. To ensure alignment with community needs, Principia conducted a survey with the local community to gather feedback on the proposed CSV actions before implementation.

All CSV actions follow the SMATRIE framework (Specific, Measurable, Achievable, Relevant, Time-Bound, Inclusive, and Equitable), ensuring they are well-structured and outcome-oriented. The effectiveness of these actions is tracked through:

- **SDG linkages:** Each action is aligned with specific Sustainable Development Goals (SDGs) to measure broader social and environmental impact.
- **Partnerships:** Actions are implemented in collaboration with NGOs, educational institutions, and local enterprises to enhance sustainability and effectiveness.
- **Created social and business value:** The CSV initiatives aim to provide tangible benefits to the community while also fostering economic opportunities.
- **Measurement and KPIs:** The success of actions is evaluated through key indicators, primarily based on the number of direct beneficiaries and qualitative community feedback. **[S3-4 34 a, AR 38, AR 39, AR 40, AR 42]**

The Group ensures that its practices do not cause or contribute to material negative impacts on affected communities through the CSV process, which is applied throughout the entire project lifecycle—from development to end-of-life (operation phase). For each new project, potential negative impacts are systematically assessed by identifying risks and dependencies on affected communities during project development and implementing mitigation measures as part of the CSV Plan to address any identified risks. **[S3-4 35, AR 30]**



Actions ^[S3-4]

As previously highlighted, Principia, always mindful of its impact on affected communities, considers the Group's contribution to the local communities of the regions where they operate, throughout Greece, a central pillar of their activities. Through special programmes, volunteering, reforestation activities, donations and support for cultural activities, Principia is in constant interaction with local communities and demonstrates commitment to sustainable development. By directly or indirectly supporting Organizations, Foundations, NGOs, Communities, Institutions, Principia has implemented, since 2020, more than 270 actions and support initiatives across the country.

Characteristically, some of the Group's most important actions are mentioned, both at national and local level, in several regions of the country:

- "Energy on the go", a green energy awareness educational program, that since 2014 has reached more than 4000 school and university students across Greece.
- During the Covid19 pandemic, Principia donated medical equipment to hospitals throughout Greece. More specifically, "Sotiria" hospital in Athens, "Mamatseio" general hospital of Kozani, University General Hospital of Alexandroupolis, University General Hospital of Patras, Karystos General Hospital, Polymylos Health Center, in Kozani and Argiri Health Center, in Karditsa.
- Supporting the work of Hellenic Fire Service with a series of initiatives such as the organization of training seminars for members of the Fire Service in Kozani, Ptolemaida, Grevena and Chalkidiki in 2023 and 2024. Moreover, Principia provided consumables to the Alexandroupolis Fire Service in 2023 and equipment and other items to the Kozani Fire Service and the Ptolemaida Firefighting Academy in 2024.

- Implementing the corporate volunteering program «Be The Hero» since 2022, carrying out actions, together with employees, in collaboration with environmental organizations, charitable organizations and communities across Greece. Under this program, Principia has carried out 3 environmental impacts, collecting over 12,500 liters of waste and has supported more than 30 charitable organizations throughout the country (Together for the Children, SOS Children's Villages, Floga, Black Light, Dinner of Love, Save Your Hood, etc.).
- Donating food and basic necessities to a variety of organizations, communities, associations supporting people with disabilities and vulnerable Groups throughout Greece. At the same time, Principia supports therapeutic and educational programs of charitable organizations, such as ELEPAP and Chatzipaterio Center for Rehabilitation of Children.
- Implementing, in collaboration with the organization TYTO and the University of Thessaly, an innovative program, installing artificial nests that will be colonized by the Tyto barn owl, in 12 of the Group's solar parks.
- In the context of the Group's corporate rebranding, Principia organized a circular economy action, in collaboration with Fabric Republic. Over 200 items (such as vests, hats, t-shirts, banners and bags), which were intertwined with past actions of the Group, were turned into brand new accessories and donated for a good cause.
- Implementation of the program «Energy Poverty - Identification and addressing of energy needs», for the community of Mavrodendri Kozani. The aim of the project, implemented in collaboration with the Bioeconomy and Environment Cluster (CluBE)

of Western Macedonia, was to investigate the phenomenon of energy poverty in Kozani. The area of Mavrodendri was chosen as it is located both in the coldest zone of the country and in the center of the energy transition.

- Completed a new innovative project in Kozani, that utilized the principles and practices of circular economy to offer education and empowerment to children but also to enhance the entertainment infrastructure of the Center for Recovery - Rehabilitation, Day Care for People with Disabilities «Kivotos».
- Completed the renovation of the old school of the village, which is now a cultural meeting center of the local community, in Sidera, Kozani, near the new Perasma solar cluster. **[S3-4 31] [S3-4 34 b]**

Principia ensures the effectiveness of its actions and initiatives for affected communities through a structured monitoring and evaluation framework embedded within its CSV process. The elements of this approach include:

- **Stakeholder identification and engagement plan:** Conducted for every new project to map key local stakeholders and define engagement strategies.
- **Structured community engagement process:** Detailed in the "CSV Definitions & Management Procedure", ensuring a standardized and transparent approach.
- **Registry of feedback:** A dedicated system is maintained to document and track community input, concerns, and responses.
- **Impact measurement through direct beneficiaries:** Each action is monitored based on the number of direct beneficiaries, ensuring that initiatives deliver tangible social and economic benefits. **[S3-4 32 d, AR 31, AR 32, AR 33]**

Business Conduct [G1]



 **principia**

GOVERNANCE

The role of the administrative, supervisory and management bodies [GOV-1]

Business conduct and the BoD

At Principia, oversight of business conduct is a fundamental pillar of ethical practices. The Group's governance structure is designed to promote transparency and accountability at every level, while the Board of Directors meets monthly to evaluate and make decisions on key agenda items for the Group's four primary companies. This consistent engagement enables oversight of strategic initiatives and operational matters, ensuring that business practices adhere to the Group's ethical and operational standards. Moreover, significant issues impacting the Group are governed centrally by Principia S.A., in accordance with the internal Shareholders Agreement (SHA). **[GOV-1 5 a]**

Further, Principia benefits from the expertise of its administrative, management, and supervisory bodies in addressing business conduct matters. The Board of Directors further strengthens this framework with its diverse experience and deep understanding of strategic governance, operational oversight, and ethical business practices. Collectively, these capabilities ensure the effective management of business conduct across all companies within the Group. **[GOV-1 5 b]**

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

Policies and corporate culture [G1-1]

The Group is committed to building a strong and inclusive corporate culture through initiatives that engage, empower, and support employees at all levels. New employees participate in induction training across all departments, providing a solid foundation in the Group's values, operations, and objectives. Quarterly business review meetings involving the entire organization, as well as one-on-one HR meetings, offer platforms for feedback and addressing concerns. To promote continuous learning and professional growth, Principia organizes regular seminars and workshops on topics such as sustainability, cutting-edge technologies like AI, and software training. The Group further enhances team cohesion and social responsibility through motivational speaker events and its annual volunteering program, "Be the Hero." These efforts are supported by adherence to internationally recognized ISO certifications, including those for Quality, Environmental Management, Occupational Health and Safety, and Anti-Bribery, which collectively reinforce a culture of integrity, sustainability, and excellence. **[G1-1 9, AR 1]**

Principia has also implemented anti-corruption and anti-bribery policies aligned with the principles of the United Nations Convention against Corruption. Guided by its core values of care, efficiency, trust, and resilience, the Group adopts practices to promote fairness in all business activities. The basis of these efforts is the Zero Tolerance for Corruption (ZTC) Plan, supported by the Code of Ethics, Compliance Program, and adherence to ISO 37001 standards for anti-bribery management systems. These frameworks include procedures for managing gifts, hospitality, and third-party relations to prevent undue influence or unethical conduct. Robust internal controls, employee training, whistleblowing mechanisms, and periodic audits ensure compliance and transparency, while regular monitoring and updates drive continuous improvement. **[G1-1 10 b]**

The Group has established procedures for prompt,

independent, and objective investigation of business conduct violations. As mentioned previously, the ZTC Plan includes confidential reporting channels such as online systems, email, phone, or in-person meetings, accessible to employees, managers, directors, and other stakeholders. Reports are reviewed by the Principia Report Receiving and Monitoring Officer, ensuring impartiality while engaging with both whistleblowers and accused parties for clarification when necessary. The Group guarantees confidentiality, subject to legal obligations, and escalates significant cases to the CEO or Board of Directors. **[G1-1 10 e]**

All new employees participate in induction training covering key principles of ethical behavior and anti-corruption practices. To further enhance awareness and compliance, Principia is evaluating the introduction of an annual mandatory internal training program. This initiative will focus on anti-corruption, business conduct, and related topics, reinforcing a strong corporate culture rooted in integrity and transparency across the organization. **[G1-1 10 g] [G1-1 7]**

Whistleblowing mechanisms

Principia is dedicated to upholding robust mechanisms for identifying, reporting, and investigating concerns related to unlawful behavior or breaches of the Code of Ethics. The Group provides accessible reporting channels, including a dedicated whistleblowing link on its website, which supports anonymous submissions and is available to both internal and external stakeholders. Additional options include email, postal submissions to the Group's address, an internal reporting platform, and a dedicated phone line. **[G1-1 10 a]**

To foster an ethical workplace, Principia also integrates whistleblower reporting mechanisms with employee training. All new employees participate in induction sessions covering key policies, such as compliance, conflict of interest, human rights, violence and harassment, the Code of

Ethics, and whistleblowing procedures. This training ensures that employees understand their rights, responsibilities, and the available mechanisms for reporting concerns. Reported issues are managed by the Report Receiving and Monitoring Officer (RRMO), who guarantees confidentiality and, when requested, arranges meetings within a reasonable timeframe to address the issues. These measures align with Directive (EU) 2019/1937, safeguarding whistleblowers and promoting ethical behavior. Also, the Group implements policies and procedures that prevent retaliation. Reporting channels are complemented by ongoing training for employees both during induction and throughout their employment. **[G1-1 10 c] [G1-1 10 d]**

Functions at risk

Principia has identified organizational functions most vulnerable to corruption and bribery and is employing a structured approach to mitigate risks. High-risk areas include:

- **Third-party interactions:** Agents, consultants, and intermediaries are subject to strict controls, including transparency, fee justification, and proper documentation.
- **Purchasing and sales processes:** Adherence to ethical standards ensures fair practices.
- **Subsidiary and partner relationships:** These are monitored for alignment with the ZTC Plan.
- **Human resources** also play a critical role, with hiring and personnel management policies requiring adherence to the Code of Ethics and disciplinary measures for violations. These efforts are reinforced through an internal control system, periodic audits, and training programs that promote compliance across all stakeholder Groups. **[G1-1 10 h]**

Management of relationships with suppliers ^[G1-2]

Late payments

The Group has implemented a payment process to ensure timely payments to all suppliers, including small and medium-sized enterprises, in strict accordance with the terms outlined in contracts. Payments are executed promptly, typically between the 26th and 29th of each month, through secure digital banking channels. Payment requests outside the regular schedule require pre-approval and adherence to strict internal controls to avoid delays. These measures ensure that all suppliers, particularly SMEs, receive payments on time, reinforcing trust and reliability in supplier relationships. **[G1-2 14, AR 2, AR 3]**

Supplier criteria

Further to that, Principia fosters supplier relationships grounded in fairness, transparency, and alignment with its core values as articulated in the Code of Ethics and Zero Corruption Tolerance Plan. Supplier selection is based on objective criteria, and procurements exceeding €50,000 involve a qualification process. This evaluation includes legal, integrity, and financial checks, as well as assessments of health and safety practices, environmental certifications, and human rights commitments. To manage supply chain risks, the Group requests suppliers to complete an Environmental, Social, and Governance self-assessment survey. **[G1-2 15 a, AR 2, AR 3] [G1-2 15 b, AR 2, AR 3]**

Prevention and detection of corruption and bribery ^[G1-3]

As mentioned earlier, Principia has established procedures to prevent, detect, and address allegations of corruption and bribery, guided by its Anti-Bribery and Zero Tolerance of Corruption Plan Policies. These policies, approved by the Board of Directors and closely monitored by the HR Department and relevant compliance committees, ensure a consistent and proactive approach to ethical governance. To uphold these standards, specific clauses are embedded in contracts with third parties, requiring adherence to ethical criteria, including Know Your Customer (KYC) compliance. Third-party partners must also maintain these standards within their own operations. Principia conducts thorough supplier assessments covering legal, financial, and integrity criteria, alongside health, safety, and sustainability practices. The Group encourages reporting of suspected violations through multiple confidential channels, including a whistleblowing mechanism. These reports are independently reviewed, with all incidents subjected to thorough investigation and appropriate action. **[G1-3 18 a, AR 5, AR 6]**

Principia ensures the impartiality of its investigative processes by maintaining independence between investigators and the management chain involved in alleged cases of corruption or bribery. Investigations are managed by designated compliance bodies with autonomy to ensure objective and unbiased assessments. The whistleblowing policy reinforces this independence by offering a confidential platform for employees and stakeholders to report violations. This structure guarantees that the integrity of the investigation process aligns with the Group's commitment to transparency and accountability. **[G1-3 18 b]**

Investigation outcomes are reported to Principia's administrative, management, and supervisory bodies, including the Chief Executive Officer and, when necessary, the Board of Directors. These reports are prepared by compliance officers or committees following thorough analysis, ensuring transparency and accountability. Actions taken to address violations are communicated to relevant bodies, and internal procedures are periodically reviewed to enhance governance. **[G1-3 18 c, G1-3 19]**

Training

Principia disseminates its Anti-Bribery and Zero Tolerance of Corruption Plan Policies through its internal platform, BoB, ensuring accessibility for all employees. New employees are introduced to these policies during onboarding and are required to acknowledge their understanding in writing. Updates to policies are communicated through emails, the BoB platform, and workshops, keeping all stakeholders informed and reinforcing the Group's stance against corruption and bribery. **[G1-3 20]**

Anti-corruption and anti-bribery training are integral to Principia's onboarding process, equipping new employees with a clear understanding of the Group's ethical standards. The training covers the scope and implementation of the Anti-Bribery and ZTC Plan Policies, ensuring alignment with the Group's values. Ongoing updates to training materials are shared through emails, the BoB platform, and workshops. Additionally, members of administrative, management, and supervisory bodies receive tailored training to uphold and promote ethical governance across the organization. **[G1-3 21 a] [G1-3 21 c]**



METRICS AND TARGETS

Confirmed incidents of corruption or bribery ^[G1-4]

During the reporting period, no breaches of anti-corruption or anti-bribery procedures or standards were identified at Principia. The Group remains unwavering in its dedication to upholding the highest ethical standards, setting a clear objective of maintaining zero incidents. **[G1-4 24 b, AR 8]**

The Group maintains a steadfast commitment to ethical business practices, ensuring full compliance with anti-corruption and anti-bribery laws. In the reporting period, there were zero recorded incidents of convictions or fines related to violations of such laws. **[G1-4 24 a]**

Political influence and lobbying activities ^[G1-5]

Principia does not engage in political contributions, whether monetary or in-kind, and consequently, no methodology is required for estimating the monetary value of in-kind contributions. The Group is represented in lobbying activities by its CEO. **[G1-5 29 b(ii)] [G1-5 29 c, AR 14]**

Oversight of activities related to anti-corruption and anti-bribery compliance within the Group is the responsibility of the Chief Executive Officer (CEO). The CEO ensures the implementation and monitoring of robust governance frameworks and ethical standards across the Group’s operations. **[G1-5 29 a]**

Principia is not registered in the EU Transparency Register, or any equivalent transparency register within a Member State. **[G1-5 29 d]**

BoD members and public administration

Furthermore, none of the members of its administrative, management, or supervisory bodies held comparable positions in public administration, including regulatory roles, in the two years preceding their current appointments. **[G1-5 30, AR 11]**

Payment practices ^[G1-6]

Recognizing the diverse needs of its suppliers, the Group adopts a flexible approach to payment practices. While the standard payment term remains 90 days, payment terms can be negotiated on a case-by-case basis. Principia strives to accommodate requests for shorter payment periods, particularly from small and medium-sized enterprises (SMEs) or suppliers with smaller contract amounts, whenever feasible. This flexibility demonstrates the Group’s commitment to fostering mutually beneficial partnerships and supporting the financial stability of its suppliers. **[G1-6 33 a] [G1-6 33 b, AR 16, AR 17] [G1-6 33 d]**

The Group demonstrates its commitment to financial responsibility and fair business practices by maintaining a timely approach to all payment obligations. As a result, there are currently zero outstanding legal proceedings related to late payments. **[G1-6 33 c]**

Principia adheres to standardized payment terms of 90 days across its main supplier categories. This policy ensures consistency and transparency in financial transactions while supporting the Group’s commitment to fostering strong and collaborative relationships with its suppliers. **[G1-6 33 b, AR 16, AR 17]**

Corruption and bribery

The table below presents key anti-corruption and anti-bribery metrics, including convictions and fines for violations, both of which recorded zero cases in the reporting period.

Anti-corruption and anti-bribery metrics	ESRS Indicator	Unit	2024
Convictions for violation of anti-corruption and anti-bribery laws	[G1-4 24 a]	No.	0
Amount of fines for violation of anti-corruption and anti-bribery laws	[G1-4 24 a]	€	0

Political engagement and lobbying activities

The table below presents political contribution metrics, showing that no monetary or in-kind political contributions were made during the reporting period.

Political contribution metrics	ESRS Indicator	Unit	2024
Monetary or in-kind political contributions	[G1-5 29 b(i), b(ii), AR 9]	€	0

Management of relationships with suppliers including payment practices

The table below presents supplier payment metrics, indicating that 100% of the Group’s payments were aligned with the standard terms, with no outstanding legal proceedings for late payments.

Supplier payments	ESRS Indicator	Unit	2024
Percentage of the Group’s payments aligned with the above standard terms	[G1-6 33 b]	%	100
Number of legal proceedings currently outstanding for late payments	[G1-6 33 c]	No.	0

GRI Index



 **principia**

 Statement of use	Principia has reported in reference to the GRI Standards for the period January 1st, 2024, until December 31st, 2024, on an annual basis.					
GRI 1 used	GRI 1: Foundation 2021					
 Applicable GRI Sector Standard(s)	Currently, there is no applicable sector standard for the energy sector.					
 GRI 1 used	 Disclosure	 Location	● ● ● Omission ● ● ●			 GRI Sector Standard
			Requirements omitted	Reason	 Explanation	
General disclosures						
GRI 2: General Disclosures 2021	2-1 Organizational details	Introduction/ Group History				
	2-2 Entities included in the organization's sustainability reporting	Introduction/ Group History				
	2-3 Reporting period, frequency and contact point	ESRS 2 General disclosures/ About this report				
	2-4 Restatements of information	ESRS 2 General disclosures/ About this report				
	2-6 Activities, value chain and other business relationships	ESRS 2 General disclosures/ Additional information/ Value chain metrics				
	2-17 Collective knowledge of the highest governance body	-	all	Not applicable	Currently, Principia's BoD uses ad-hoc training on sustainability matters.	
	2-18 Evaluation of the performance of the highest governance body	-	all	Not applicable	ESG considerations, while continuously acknowledged, are not subject to specific board evaluations.	
	2-20 Process to determine remuneration	-	all	Confidentiality constraints	For reasons of confidentiality, Principia would not report on this indicator but will consider including this ratio on future reports.	
	2-21 Annual total compensation ratio	-	all	Confidentiality constraints	For reasons of confidentiality, Principia would not report on the metrics of this indicator but will consider including this ratio on future reports.	
	2-22 Statement on sustainable development strategy	Letter from the CEO				
	2-23 Policy commitments	Employees / Impact, risk and opportunity management / Policies				
	2-24 Embedding policy commitments	Employees / Impact, risk and opportunity management / Policies				
	2-25 Processes to remediate negative impacts	Employees / Impact, risk and opportunity management / Actions				
	2-26 Mechanisms for seeking advice and raising concerns	Employees / Impact, risk and opportunity management / Policies / Channels to raise concerns				
	2-27 Compliance with laws and regulations	-	Confidentiality constraints	Confidentiality constraints	For reasons of confidentiality, Principia would not report on the metrics of this indicator but will consider including this ratio on future reports.	

Material topics						
GRI 3: Material Topics 2021	3-1 Process to determine material topics	ESRS 2 General disclosures/ Strategy/ Stakeholder engagement				
	3-2 List of material topics	ESRS 2 General disclosures/ Strategy/ Material impacts, risks and opportunities				
 Climate change ^[E1]						
GRI 3: Material Topics 2021	3-3 Management of material topics	ESRS 2 General disclosures / Impact, risk and opportunity management / Processes to identify and assess material impacts, risks and opportunities				
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Climate change / Metrics and targets / Financial reconciliation				
	302-3 Energy intensity	Climate change / Metrics and targets / Financial reconciliation				
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Climate change / Metrics and targets / Gross Scopes 1, 2, 3 and Total GHG emissions	d	Not applicable, information incomplete	d: Baseline years will be further revised according to Principia's strategic plan	
	305-2 Energy indirect (Scope 2) GHG emissions	Climate change / Metrics and targets / Gross Scopes 1, 2, 3 and Total GHG emissions	d	Not applicable, information incomplete	d: Baseline years will be further revised according to Principia's strategic plan	
	305-4 GHG emissions intensity	Climate change / Metrics and targets / Financial reconciliation				
 Pollution ^[E2]						
GRI 3: Material Topics 2021	3-3 Management of material topics	Pollution / Impact, risk, and opportunity management / Identification of impacts				
 Biodiversity and ecosystems ^[E4]						
GRI 3: Material Topics 2021	3-3 Management of material topics	Biodiversity and ecosystems / Impact, risk and opportunity management / Impact identification	e	Information incomplete	Relevant specific goals will be set in the future having regard to commercial conditions and always in compliance with regulatory requirements.	
 Employees ^[S1]						
GRI 3: Material Topics 2021	3-3 Management of material topics	Employees / Strategy / Material impacts, risks and opportunities	e	Information incomplete	Relevant specific goals will be set in the future having regard to commercial conditions and always in compliance with regulatory requirements.	
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Employees / Metrics and targets / Characteristics of the undertaking employees				
	401-3 Parental leave	Employees / Work-life balance metrics / Family-related leaves				
GRI 403: Occupational Health and Safety 2018	403-3 Occupational health services	Employees / Policies / Human Rights Policy				
	403-9 Work-related injuries	Employees / Metrics – Health and safety				
GRI 404: Training and Education 2016	405-1 Diversity of governance bodies and employees	Employees / Training and skills development metrics				
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Employees / Diversity metrics / Types of top management				
 Affected communities ^[S3]						
GRI 405: Diversity and Equal Opportunity 2016	3-3 Management of material topics	Affected communities Material impact risks and opportunities / Impact, risk and opportunities		Information incomplete	Relevant specific goals will be set in the future having regard to commercial conditions and always in compliance with regulatory requirement	
 Business conduct ^[G1]						
GRI 3: Material Topics 2021	3-3 Management of material topics	Business conduct / Governance / The role of administrative, supervisory and management bodies	e	Information incomplete	Relevant specific goals will be set in the future having regard to commercial conditions and always in compliance with regulatory requirement	
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	Business conduct / Impact, risk and opportunity management/ Prevention and detection of corruption and bribery		Information incomplete	Relevant specific goals will be set in the future having regard to commercial conditions and always in compliance with regulatory requirement	
	205-3 Confirmed incidents of corruption and actions taken	Business conduct / Metrics / Confirmed incidents of corruption or bribery				



18, Sorou Str., 15125 Athens - Greece
tel: +30 211 180 8500
info@principia-energy.com