

ENVIRONMENT, HEALTH & SAFETY POLICY

This policy outlines the Environment, Health and Safety (EHS) principles and covers all activities related to the EPC (Engineering, Procurement and Construction) and O&M (Operation and Maintenance) of photovoltaic parks.

It is binding for all employees, subcontractors, suppliers and visitors involved in Greencells Group operations and is effective as of 05 March 2026.

1. DECLARATION OF COMMITMENTS

The Greencells Group acknowledges that the development and construction of photovoltaic farms inherently involve significant risks to occupational health and safety, together with potential impacts on the environment.

The Company is fully committed to:

- Providing a safe and healthy working environment for all employees, contractors, and collaborators;
- Eliminating hazards and reducing EHS risks through effective preventive and control measures;
- Preventing accidents, incidents, and occupational illnesses;
- Protecting the environment, preventing pollution, and minimizing our environmental footprint, including the reduction of energy consumption, waste generation, and greenhouse gas emissions;
- Complying with all applicable legal and other relevant requirements;
- Continually improving the effectiveness and performance of our EHS management system;
- Ensuring effective emergency preparedness and response to minimize the impact on health, safety, and the environment.

Safety is non-negotiable. No activity is so urgent or important that it cannot be performed safely.

2. OUR COMMITMENT TO EHS EXCELLENCE

The company aims to:

- Continuous annual reduction of the LTIR (Lost Time Injury Rate)

- Achieving 100% implementation of planned audits and inspections across all projects
- Ensuring 100% closure of incident investigations within the established timeframe
- Closing corrective and/or preventive actions within the established timeframe
- Ensuring 100% compliance with mandatory training requirements
- Promoting responsible waste management and continuously reducing the environmental impact and carbon footprint of our operations

3. LEGAL COMPLIANCE AND OTHER REQUIREMENTS

The company is committed to complying with all applicable legal requirements related to occupational health and safety, environmental protection, and labor law, as well as all relevant contractual obligations established with clients.

Where internal standards or contractual requirements exceed local legal requirements, the company will apply the more stringent standard.

4. RISK MANAGEMENT IN PHOTOVOLTAIC PROJECTS

For each project, detailed risk assessments will be conducted prior to the commencement and throughout the duration of all activities, considering all stages of the work, including civil works, structure assembly, module installation, DC/AC wiring, commissioning and energization, operation and maintenance.

Safe working methods and work permits will be established for critical activities, including:

- Work at height
- Electrical work and energization
- Excavation and underground work
- Operation of heavy machinery
- Crane lifts
- Hot work activities
- Work in severe weather conditions

No activity will commence without a proper risk assessment and the implementation of appropriate control measures

5. RESPONSIBILITIES AND LEADERSHIP

Senior Management is responsible for setting the strategic direction of EHS and monitoring overall performance.

EHS Department provides technical support, monitors compliance, investigates incidents, and coordinates training programs.

Project Managers are responsible for integrating EHS requirements into project planning, resource allocation and subcontractor supervision.

All employees and subcontractors are responsible for working safely and are required to follow established procedures and immediately report any hazardous situation. Every worker has the right and obligation to stop work in the event of imminent danger.

To ensure active engagement in health, safety, and environmental matters, the company maintains an EHS Committee composed of representatives from management and employees. The Committee meets regularly to review safety performance, discuss hazards, evaluate near-miss reports, and provide recommendations for continuous improvement. All employees are encouraged to participate, raise concerns, and contribute to the development of safer work practices.

6. TRAINING, COMPETENCE AND AWARENESS

The Company will ensure that all personnel involved in our activities are competent and receive training appropriate to their role.

Training will include:

- Initial and periodic training
- EHS inductions for construction sites
- Regular toolbox talks
- Specialized training for critical activities (e.g., electrical work, work at height, LOTO)
- Subcontractors will be evaluated from an EHS perspective prior to commencing the activity

7. ENVIRONMENTAL PROTECTION

The company is committed to preventing pollution and minimizing our environmental impact through:

- Proper waste management
- Control of fuel and hazardous substance leaks
- Protection of soil, water, and biodiversity
- Reduction of emissions and resource consumption
- Compliance with environmental requirements from authorities

8. REPORTING AND INVESTIGATING INCIDENTS

All accidents, incidents, and near-miss situations shall be reported and investigated to determine their root causes.

The findings from these investigations will be communicated throughout the organization and used to implement corrective actions, preventing recurrence of similar events.

9. CONTINUOUS MONITORING AND IMPROVEMENT

EHS performance will be monitored using specific indicators, such as the Lost Time Injury Rate (LTIR), timely completion of incident investigations, audits conducted, etc.

The EHS policy and management system will be regularly reviewed to ensure continuous improvement and alignment with operational changes.

The company conducts regular internal audits to assess compliance with EHS procedures and identify opportunities for improvement. Additionally, external audits by independent parties or clients are carried out as required, ensuring that our EHS management system meets legal, contractual, and international standards, and that lessons learned are integrated into continuous improvement initiatives.

10. REVIEW AND COMMUNICATION

This policy will be reviewed annually, or whenever significant legislative, organizational, or operational changes occur.

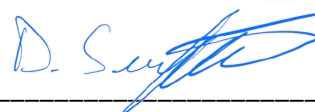
It is communicated to all employees and subcontractors and is made available to all involved parties.

Saarbrücken, 05.03.2026

Signed by:


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Fabian Herr (CEO)



Daniel Seuffert (COO)