
Sustainability policy

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1 ABOUT THE TINFOS SUSTAINABILITY POLICY

The UN's sustainability goals outline a joint work plan for a global sustainable future. Everyone is expected to help achieve the goals, including the business community. Tinfos both can and will contribute in our own way. Sustainability and social responsibility must be an integral part of our activities and in our projects.

We regard our activities as part of the global transition towards a more diversified, low carbon energy future in accordance with the United Nations Sustainable Development Goals (UN SDGs). In all our activities we uphold the Ten Principles of the UN Global Compact on Human Rights, Labour, Environment and Anti-Corruption.

By conducting a materiality assessment, we have identified the sustainability topics that are the most material for Tinfos. We base our sustainability policy on the SDGs and the result from the materiality assessment. The materiality assessment identifies the following as the most material topics for Tinfos:

| Economic | Environmental | Social |
|----------------------|---------------------------|--------------------------------|
| Economic performance | Biodiversity | Labour Rights |
| Business Integrity | Renewable Energy | Occupational Health and Safety |
| Good Governance | Water Resource Management | |
| | Climate Change Mitigation | |
| | Climate Change Resilience | |

The table below illustrates how the prioritized topics identified by the material assessment align with the UN Sustainability Development Goals. This correlation forms the basis for our sustainability policy.

| | 3 GOOD HEALTH AND WELL-BEING | 6 CLEAN WATER AND SANITATION | 7 AFFORDABLE AND CLEAN ENERGY | 8 DECENT WORK AND ECONOMIC GROWTH | 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE | 13 CLIMATE ACTION | 14 LIFE BELOW WATER | 15 LIFE ON LAND | 16 PEACE, JUSTICE AND STRONG INSTITUTIONS |
|--------------------------------|------------------------------|------------------------------|-------------------------------|-----------------------------------|---|-------------------|---------------------|-----------------|---|
| Economic Performance | | | ● | ● | ● | | | | |
| Business Integrity | | | | ● | | | | | ● |
| Good Governance | | | | ● | | | | | ● |
| Biodiversity | | | | | | | ● | ● | |
| Renewable Energy | | | ● | ● | ● | ● | | | |
| Water Resource Management | | ● | | | | ● | ● | | |
| Climate Change Mitigation | | | ● | | | ● | ● | ● | |
| Climate Change Resilience | | | ● | | | ● | ● | ● | |
| Labour Rights | ● | | | ● | | | | | |
| Occupational Health and Safety | ● | | | ● | | | | | |

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2 ECONOMIC SUSTAINABILITY POLICY

2.1 Economic performance

Tinfos aims to create investment possibilities for our owners, clients and partners and value for all our stakeholders by utilizing our knowledge in renewable energy production to build and operate high quality small and medium sized hydro power plants in Norway and abroad.

We conduct our business and activities in a way that prevents damage to persons, equipment and environment.

2.2 Business integrity

Tinfos has zero tolerance towards all forms of corruption, and we take active measures to ensure that this does not happen in our business or activities. We exercise integrity in all situations, complying with our ethical standards described in the Tinfos Code of Conduct.

2.3 Good governance

At Tinfos, we have sound corporate business structures, policies and practices and act in an open and transparent manner. Our corporate governance components are described in our Corporate Governance Policy.

Tinfos comply with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, with specific references to the ILO Core labor Conventions.

In all our activities we uphold the Ten Principles of the UN Global Compact on Human Rights, Labour, Environment and Anti-Corruption.

We establish compliance assurance processes in our projects to identify all relevant legal and regulatory requirements, licence conditions and reporting requirements. We aim to establish a good relationship with regulators, authorities and other stakeholders in all our activities.

We recognize the procurement process as a source of potential risks and opportunities and establish procurement plans and processes to ensure that suppliers get the opportunity to offer products and services to Tinfos on equal terms.

We believe that good corporate governance is based on productive relationships with our stakeholders and aim to identify and understand our stakeholder's requirements and expectations through stakeholder mapping and materiality analysis.

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3 ENVIRONMENTAL SUSTAINABILITY POLICY

Tinfos act responsibly vis-à-vis our stakeholders affected by our activities, and we are committed to supporting precautionary approaches to addressing environmental challenges.

3.1 Biodiversity

At Tinfos, we identify biodiversity issues relevant to project development and implementation through assessment processes utilising appropriate expertise, and we undertake monitoring as appropriate to the identified issues.

We conduct environmental impact assessments identifying risk factors to life on land and below water, and establish activities described in specific action plans in all our projects to avoid, minimise and mitigate related risks.

3.2 Renewable Energy

At Tinfos, we are cost effective in our preparation, implementation and operation of hydropower plants. We contribute to affordable, clean and renewable energy for the community through our focused project conduct, operational experience and asset management excellence.

We provide reliable hydropower plants that contribute to a safe, sustainable, renewable and lasting energy supply.

3.3 Water Resource Management

At Tinfos, we take appropriate measures to identify risks and prevent pollution during construction and operation of hydropower plants.

When reservoir generation is a part of our project, we identify important considerations prior to and during reservoir filling through an assessment process. Such considerations may be related to safety, clearing of vegetation, cultural heritage sites, land and slope stability etc., and we manage these issues according to established plans.

We conduct impact assessments identifying risk factors to life on land and below water, and establish activities described in specific action plans in all our projects to avoid, minimise and mitigate downstream flow related risks. Tinfos ensure that any project impact on water resources used by local community or stakeholders are identified and managed appropriately. We identify and assess issues in relation to flow regimes downstream of project and plant infrastructures, and monitoring is undertaken to ensure compliance to downstream seasonal variation flow requirements.

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3.4 Climate Change Mitigation

Tinfos contributes to climate change mitigation through our renewable energy production from our hydropower plants, making sustainable energy production an alternative to fossil fuel.

We seek to expand our understanding of the impact of our activities on the climate through by mapping of climate emissions generated in our projects and daily operations such as fuel and power use in transportation, manufacture of key-supplies (e.g. cement), and construction of the dam and powerplant.

We involve our supply chain in our commitment to climate change mitigation.

We seek and collect GHG emissions data making us able to make decisions and optimisation in future project to reduce GHG footprint from our construction activities and to further increase the net climate change mitigation benefit from establishing renewable and sustainable hydropower.

We ensure safe and environmentally sound handling and transport of materials and waste.

3.5 Climate Change Resilience

Tinfos identify risks related to hydrological weather conditions that may occur during the construction phase of our projects such as flooding and land slide, and ensure that actions are implemented to remove, minimise or mitigate the related risks to people, equipment and environment.

Tinfos assess our hydropower plant resilience to climate change, which incorporates an assessment of plausible climate change at the project site supported by hydrological measurements and estimates. We apply these conditions in our design basis to ensure safety to 3rd person, dam safety, other infrastructural resilience and energy generation availability.

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4 SOCIAL SUSTAINABILITY POLICY

4.1 Labour Rights

In all our activities we uphold the Ten Principles of the UN Global Compact on Human Rights, Labour, Environment and Anti-Corruption.

Tinfos respects the right of employees to form and join trade unions and recognises the right of employees to conduct collective bargaining.

Tinfos does not tolerate exposing employees to social dumping in the sense of serious breaches of health, environmental and safety rules, including rules on working hours and requirements for housing standards or that employees are offered wages and other benefits that are unacceptably low compared to what employees normally earn in the same country.

At Tinfos, we actively ensure the training and competence enhancement of local supervisory personnel and operators.

4.2 Occupational Health and Safety

Tinfos is committed to provide a safe workplace. Thus, we are required to organize and operate our business in a way that prevents damage to personnel, material or the environment from occurring. Tinfos' HSE efforts shall be based on systematic measures to ensure that the company's business activities are organized, performed and maintained in accordance with the requirements set forth in or pursuant to the applicable HSE legislation.

At Tinfos, we seek common ground through regular dialogue and cooperation between employees and management in matters related to occupational health and work environment.