SUSTAINABILITY REPORT

2025

Sustainability Report 2025	Rev. 02, 10.06.2026
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Reviewed by:	Asgeir Drugli
External party review:	
Approved by:	Øyvind Frydenberg

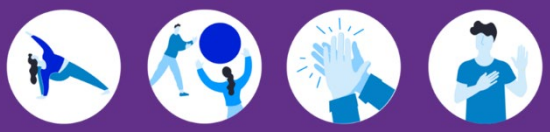
Our vision

We accelerate the global transition towards a clean energy future

Our mission

We design, build, finance, operate and maintain high quality renewable energy powerplants that creates financial, social and environmental values in selected markets

Our Values



Agility Enthusiasm Interaction Integrity

Front page photo

Photo: Agus Tiryanto
PLTM Nagajaya, Access road

Tinfos' CEO on sustainability

At Tinfos, sustainability is not a separate agenda — it is at the core of how we think, decide and operate every day. As a company developing and operating renewable energy, we recognize both the opportunities and the responsibilities that follow. In 2025, we have taken important steps to further integrate environmental, social and governance considerations into all aspects of our business.

Øyvind Frydenberg, CEO Tinfos AS. Photo M. Kanstad

A key milestone during the year was the continued development of our Environmental and Social Management System (ESMS), building on our ambition to align with international standards such as the IFC Performance Standards. This work reflects our commitment to move from intentions to structured, measurable and verifiable processes, ensuring that sustainability is managed with the same discipline as any other core business function.

At the same time, our collaboration with long-term financing partners has played an important role in strengthening both our ambitions and our accountability. In 2025, Tinfos, through Tinfund, entered into a financing agreement with Pentagreen Capital to support a portfolio of small run-of-river hydropower projects in Indonesia, including the Nagajaya project. The financing facility is designed to enable the efficient development and scaling of distributed renewable energy assets, contributing to stable and reliable power supply, reduced emissions and broader energy transition objectives in the region.

The projects supported under this framework are developed in line with internationally recognized environmental and social standards. For Tinfos, this partnership has reinforced the importance of structured monitoring, reporting and continuous improvement across all ESG disciplines.

Operationally, 2025 has been characterised by a strong and consistent focus on health, safety and environmental performance. We have continued to develop and implement project-specific management plans, tools and procedures, while maintaining close follow-up through inspections, audits and daily operations. Safety remains our top priority, and I am pleased to see the dedication and professionalism demonstrated by our teams, both in Norway and in Indonesia.

At the Nagajaya project in Indonesia, ESG and HSE are not concepts on paper, but visible in daily practice. Through structured management plans, regular safety routines and systematic follow-up of observations and deviations, the project continues to strengthen its performance and culture on site. The collaboration between our Norwegian and Indonesian teams, together with contractors and external advisers, has been a key factor in this development.

We have also strengthened our governance and oversight during the year, including through ESG audits and enhanced reporting to our external stakeholders. These processes are important, not only for compliance, but to ensure learning, improvement and transparency in how we operate.

Looking ahead, we will continue to develop our systems, improve data quality and further integrate ESG into our decision-making processes. Our ambition is clear: to deliver renewable energy projects that create long-term value — not only economically, but also for people, communities and the environment.

Øyvind Frydenberg
CEO, Tinfos AS

Our climate commitment

Tinfos is committed to contributing to the global transition towards a low-carbon energy system through the development and operation of renewable energy assets. Our core business – small run-of-river hydropower – provides stable, reliable and dispatchable renewable energy, supporting both climate mitigation and energy security. As part of Tinfos' contribution to the net zero transition, our primary and most impactful role remains the production of renewable hydropower. This clean energy source forms the backbone of our climate strategy.

In parallel, we are committed to reducing emissions from the construction phase of new power plants. This includes a phased approach to adopting low-carbon materials, transitioning to electric and biofuel-powered machinery, and optimizing logistics and site operations. Over time, we aim to achieve a 20% reduction in construction-related emissions within 5 years (2030), 50% within 15 years (2040), and up to 60% within 25 years (2050). These targets are supported by stricter procurement criteria, circular material flows, and the integration of life cycle assessments into all project phases. Together, these efforts ensure that both our operations and our infrastructure development align with long-term climate goals.

Due to the varying number, size, and scope of our hydropower construction projects from year to year, it is challenging for Tinfos to define absolute emission reduction targets in tonnes of CO_2e. While increased construction activity may lead to higher direct emissions, it also enables greater production of renewable hydropower—our most important contribution to the green transition. Each new plant helps displace fossil-based energy sources, resulting in a net climate benefit. Therefore, our success in reducing emissions must be measured not only in absolute terms, but in terms of emission intensity. We aim to track and reduce the CO_2e emissions per unit of weight, volume, or energy associated with the materials we purchase and the energy we consume during construction. This approach ensures that even as we scale up renewable energy production, we continue to improve the climate efficiency of our operations.

Photo: Kjell Magne Haugen

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1 ABOUT THIS REPORT

Report period: ***Calendar year 2025***

We publish this sustainability report to ensure transparent communication with our stakeholders about our sustainability and ESG efforts.

Tinfos AS, a mid-sized Norwegian company, had 34 employees as of December 31, 2025. Our subsidiary, PT Tinfos Hydropower Solutions in Indonesia, employed 10 people.

This report covers our activities both in Norway and in Indonesia.

We follow the Nordic Sustainability Reporting Standard (NSRS) and its Implementation Manual for Level 1 reporting. Our material input, energy, and GHG-emission data were collected using our digital ESG tool from CEMAsys. We also used results from our stakeholder identification process and our Material Assessment.

Additionally, we included information from our Communication on Progress (COP) report for the UN Global Compact principles in human rights, labour, environment, and anti-corruption which is our annual disclosure to our stakeholders on progress made in implementing the ten principles of the UN Global Compact and also information relevant to the Norwegian Transparency Act that came into effect 1 July 2022.

Sustainability and ESG matter to us, particularly because our work in constructing and operating hydropower facilities contributes to climate change mitigation. Stakeholders expect us to report on these parameters.

In 2025, we enhanced our tools for collecting and analysing GHG emissions data and other relevant ESG information further, among other things by implementing a reporting wizard allowing contractors to report GHG and material data directly to our digital ESG register. This report reflects those improvements, and our efforts made to ensure sustainable hydropower construction, operation, and maintenance.

Our power plants Tinfos I and II and our head office are centrally located by the Tinnelva river in Notodden, in Tinfos' cultural environment. Ever since Tinfos was established in 1894, we have stayed in the area – and left our mark on it. Now, modern business and lifestyle are combined with culture and tradition. The area is an important part of UNESCO's Rjukan – Notodden World Heritage Site. This report includes a section on cultural heritage issues and our activities to maintain Tinfos as an attractive destination.

For a complete picture of our business, sustainability status, and ESG progress, read our Tinfos Annual Report 2025 (Financial), Health, Safety and Environment Annual Report 2025, and our Account for Due Diligence under the Transparency Act. All reports are available online.

Comments to this report?

Email to: post@tinfos.no

Asgeir Drugli
Chief Sustainability Officer

2 WHO WE ARE

Company name:	Tinfos
Organisational form:	AS
Organisational number:	916 763 476

Number of employees:	
Tinfos AS, Norway:	PT THS, Indonesia:
34	10

NACE Code

Activities classified after NACE macro-sector codes

D35.1.1 – Production of electricity
D35.1.4 – Trade of electricity
F42.2.2 – Construction of utility projects for electricity

Figure 1 - Who we are

2.1 What we do

Tinfos is a technology company that develops, builds, sells, and operates hydropower plants. We also produce and trade renewable energy from our own hydroelectric power facilities.

The company's vision has been adopted by the Board of Directors:

We accelerate the global transition towards a clean energy future

The company's mission is to design, build, finance, operate and maintain high-quality hydropower plants that create economic, social and environmental values in the markets we operate.

2.2 Our key suppliers

Figure 2 - Our key suppliers

2.3 Our key stakeholders

In cooperation with a third-party independent consulting company, we have made a stakeholder assessment for Tinfos. Stakeholders have been identified for all segments of the value chain.

Our key stakeholders are:

Figure 3 - Our stakeholders

Stakeholders continue to play a significant role in Tinfos' activities and development. In 2025, we have placed increased emphasis on structured stakeholder engagement, particularly in connection with our operations in Indonesia and the ongoing development of the Nagajaya hydropower project. Through these activities, stakeholders provide valuable input, perspectives and local knowledge that contribute to improving both our project execution and long-term sustainability performance.

In the Nagajaya project, stakeholder engagement is an integrated part of our Environmental and Social Management System. Dedicated stakeholder engagement processes have been established to identify, map and interact with affected parties, including local communities, authorities and other relevant interest groups. Through regular communication, consultations and feedback mechanisms, we aim to ensure that stakeholder concerns are addressed and that project impacts are understood and managed in a transparent and responsible manner.

We consider open dialogue with stakeholders to be essential for building trust and maintaining our social license to operate. Feedback from local communities and project stakeholders provides valuable insights that strengthen decision-making and contribute to continuous improvement.

3 HOW WE OPERATE

3.1 Our core values

Our ambition is to make sustainable hydropower profitable for our customers and stakeholders. We always aim to deliver the best technology suited for each specific task supported by our market knowledge and business understanding.

Our core values are ***agility***, ***interaction***, ***enthusiasm*** and ***integrity***.

Our Corporate Governance Policy is available to our stakeholders and to the public on our webpages.

3.2 Our management structure

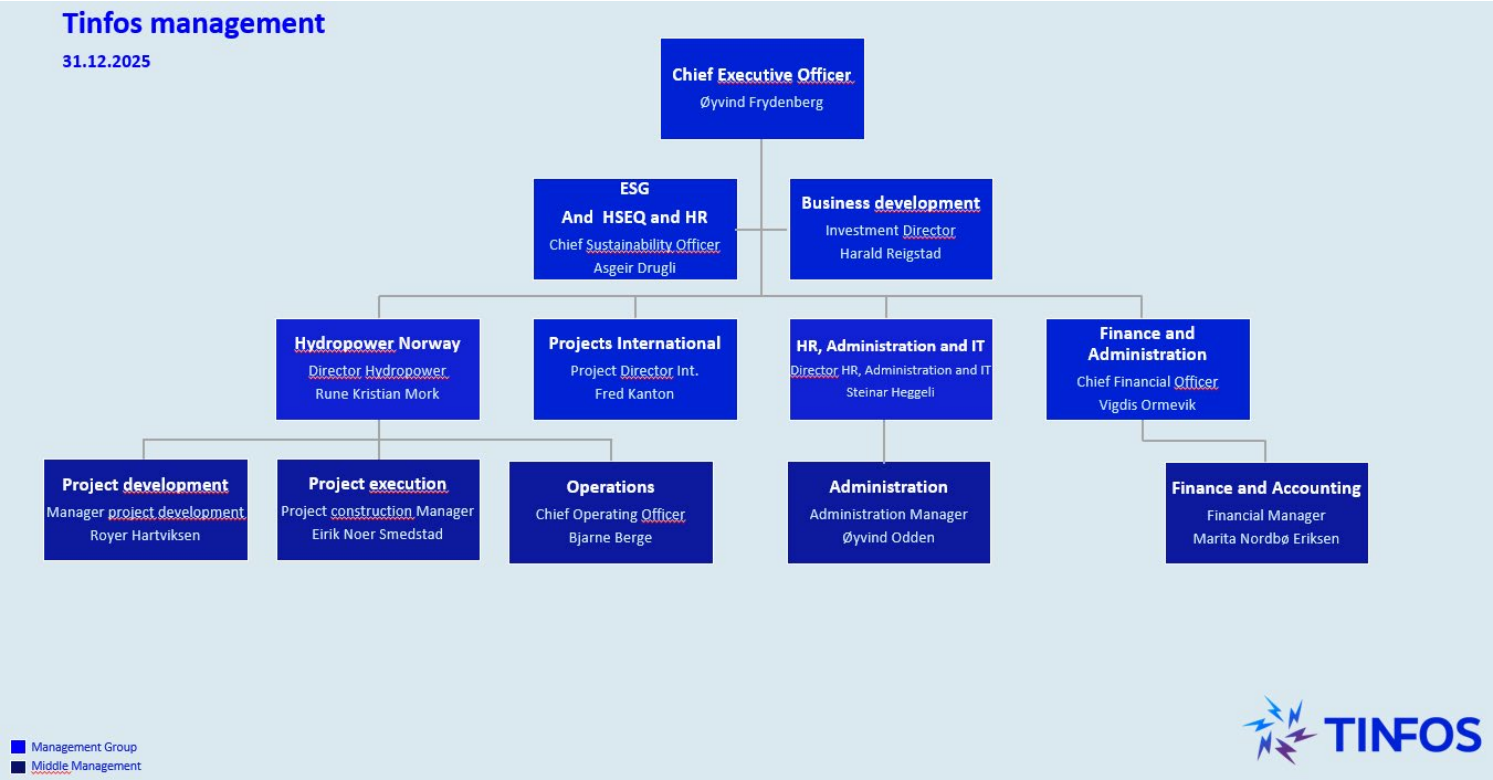


Figure 4 - How we govern sustainability

3.3 How we govern sustainability

3.4 ESG and sustainability organization in Indonesian projects

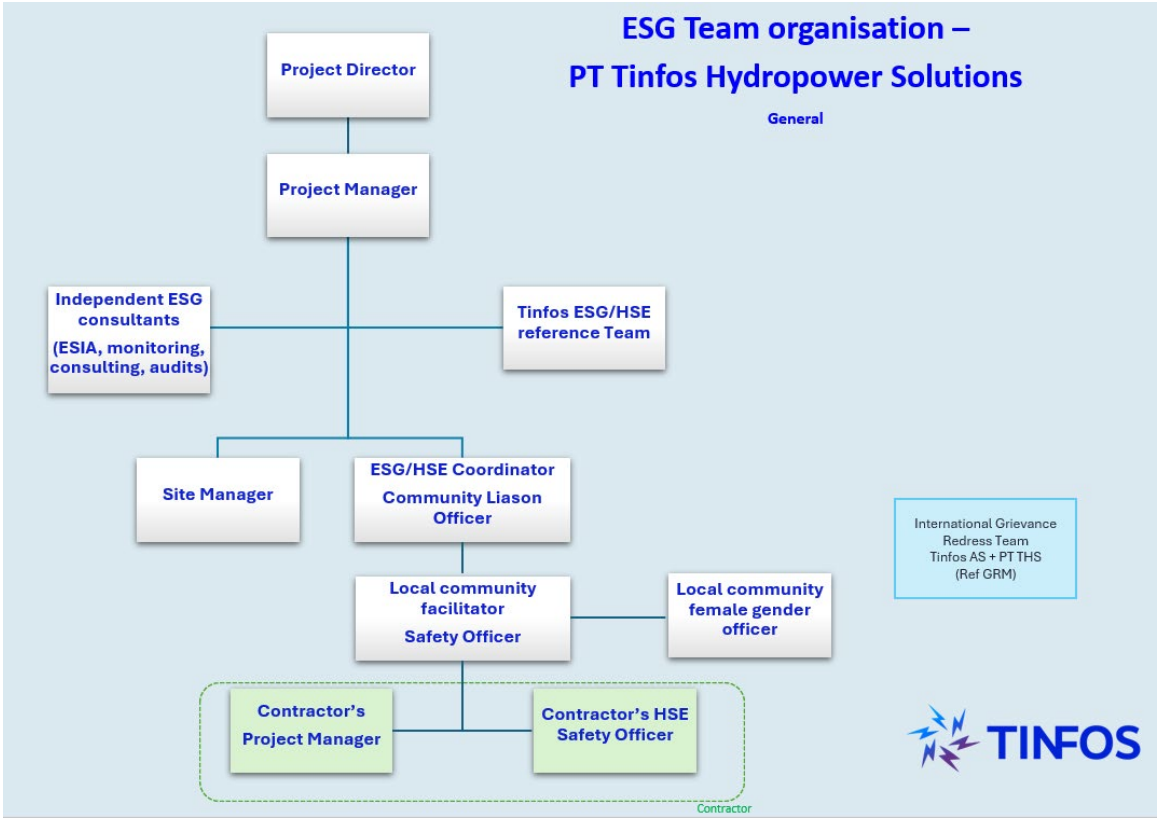


Figure 6 - ESG governance in Indonesian projects

Tinfos has established an integrated ESG and sustainability governance structure for its hydropower projects in Indonesia, where environmental, social, and safety considerations are embedded within the overall project management framework.

ESG responsibilities are anchored at project leadership level through the Project Director and Project Manager, supported by a dedicated ESG/HSE Coordinator who also performs the function of Community Liaison Officer at site level. This combined role is central to effective implementation, with day-to-day responsibility for translating company requirements and international standards into practical actions on site. The role includes coordinating environmental and social risk management activities, ensuring compliance with HSE procedures, facilitating stakeholder engagement, and maintaining continuous dialogue with local communities. Particular emphasis is placed on proactive engagement, grievance handling, and inclusion, helping to ensure that community concerns are identified early and addressed in a structured and transparent manner.

The Tinfos ESG/HSE Reference Team supports this work by providing technical guidance, maintaining policies and tools, and ensuring alignment with the company's environmental and social management system (ESMS) and recognised frameworks such as the IFC Performance Standards and OECD Guidelines for Responsible Business Conduct.

Implementation is further strengthened through local roles responsible for community facilitation, safety, and gender inclusion. Independent ESG consultants provide additional expertise and external verification through impact assessments, monitoring, and audits. ESG obligations are cascaded to contractors by contractual obligations, supplier ESG declarations and defined roles and responsibilities.

This structure aims to enable effective management of environmental and social risks throughout the project lifecycle and across the value chain.

3.5 Corporate governance and business integrity

Our Corporate Governance Policy is disclosed to our stakeholders on our webpages. Together with our Code of Conduct the governance policy establishes a clear and transparent framework on how Tinfos maintain business integrity.

The Norwegian Corporate Governance Board (NUES) has published the "*Norwegian Code of Practice for Corporate Governance*", which provides principles and guidelines that help clarify the responsibilities and authority of larger companies. In essence, these companies are listed on regulated markets in Norway. The purpose of the Code of Practice is for such companies to have corporate governance that clarifies the division of roles between shareholders, the board of directors and daily management beyond what follows from the legislation.

Tinfos is not listed on regulated markets. Nevertheless, several of the recommendations suit Tinfos and the company's corporate form and ownership. Therefore, the Board of Directors of Tinfos has chosen to follow suitable recommendations by including them in the company's corporate governance policy.

The *Corporate governance policy* for Tinfos is made available on the Tinfos website.

3.6 Integrated reporting

Integrated reporting is a comprehensive approach to corporate reporting that combines financial information with environmental, social, and governance (ESG) data to provide a holistic view of how an organization creates value over time.

At Tinfos we use the following reports to explain how our strategy, governance, performance, and prospects contribute to sustainable value creation in the short, medium, and long term:

- Annual (Financial) Report
- Annual Sustainability Report
- Annual HSE Report
- Annual account for due diligence according to the Transparency Act

All reports are available to the public on our website.

4 ECONOMIC PERFORMANCE

Our economic and financial performance can be reviewed in our Annual Report on our website.

Picture 1 Nagajaya village Januar 2025. Photo: Marianne Kanstad

5 OUR CLIMATE IMPACT

Our vision is to accelerate the global transition towards a clean energy future. This means steering our efforts towards the areas where we can contribute the most – that is, where our climate impact is greatest. For Tinfos this means following our mission; to design, build, finance, operate and maintain high quality renewable energy powerplants producing electric power from clean and sustainable hydropower, replacing non-renewable and less sustainable energy sources.

In 2025, Tinfos generated approximately 280 GWh of renewable electricity from its own hydropower portfolio. This production represents a consistent and predictable contribution of low-carbon energy to the Nordic power system and reflects the long-term value of hydropower as part of a resilient and climate-friendly energy mix.

The company's climate impact is further strengthened through the development of new projects. During 2025, two hydropower plants in Norway were successfully completed and commissioned. Frøytlandsfoss was completed in June 2025 with an expected annual production of approximately 8,6 GWh, while Smådalselva was completed and handed over in September 2025 with an expected annual production of approximately 9 GWh.

In parallel, Tinfos continued the development of its international project portfolio. Construction of the Nagajaya hydropower project in Indonesia progressed throughout 2025, with the objective of delivering approximately 34 GWh of renewable energy annually once operational. This reflects Tinfos' ambition to contribute to renewable energy generation not only in Norway, but also in regions where the need for new clean energy capacity is significant.

We recognize that our activities when building and operating hydropower plants represent sources of climate gas emissions. Therefore, it is important for us to monitor and analyze data retrieved directly from the construction projects and operational activities.

Up till 2021, no monitoring of input materials, waste generation, energy consumption or GHG emissions was done in our projects. In close cooperation with our clients and our key suppliers, we started monitoring relevant data in our projects in 2021. During 2022 we established tools, processes and procedures providing us with the ability to effectively collect and analyze data related to GHG emissions from all our projects. From 2023 GHG we require GHG data reporting from all our entrepreneurs and suppliers in all our projects through our purchase contracts, thus making it possible to establish project specific carbon footprints for all our projects which helps us to develop our baseline for our climate impact.

We aim to use the data to make climate impact assessments, to identify and make qualified priorities of relevant carbon reducing actions and, if applicable; create more specific climate targets for future project activities and operations.

5.1 Materials input

The Global Resources Outlook, published by the UN Environment Programme (UNEP) and the International Resource Panel (IRP) in 2024 states that over 55% of global greenhouse gas emissions are linked to the extraction and processing of materials—such as fossil fuels, metals, minerals, and biomass. Material use is one of the main drivers of climate change, biodiversity loss, and pollution. Global material consumption has more than tripled over the past 50 years, largely driven by infrastructure development and transportation systems.

At Tinfos, we have established our improvement targets by initially investigating the climate footprint of the products we purchase for building and operating power plants. Additionally, we are exploring the potential for selecting alternative products to reduce the climate footprint from our material input.

In our projects, Tinfos developes a comprehensive overview of the material usage, allowing us to calculate the total climate impact associated with constructing new small hydropower plants.

5.1.1 Input material to Tinfos activities

The input material consumption for our projects in Norway and Indonesia totalled 3944 tonnes in 2025. These figures includes monthly reported consumable supplies during plant construction, which are reported monthly. The main materials used in the projects, such as concrete, electromechanical equipment, rebar, wood, and waterpipes, are calculated and reported at the end of each project.

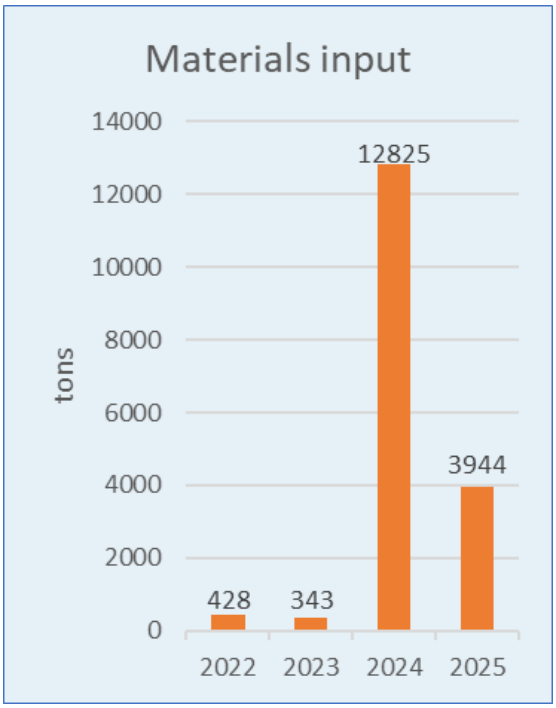


Figure 7 - Materials input

Input material flow related to administration, operation and maintenance activities on Tinfos powerplants are regarded as negligible for 2025.

HPP CONSTRUCTION PROJECTS *Material description*	Input [tonnes]	Renewable [tonnes]	Non-renewable [tonnes]	*Source*
Concrete/Cement*	3 452,4		3 452,4	Portfolio report, CEMASYS
Explosives	8,9		8,9	Portfolio report, CEMASYS
Steel el/mech components*	189,2		189,2	Portfolio report, CEMASYS
Rebars* and steelbars*	118,3		118,3	Portfolio report, CEMASYS
Building insulation material*	40,0			Portfolio report, CEMASYS
Wood*	9,8	9,8		Portfolio report, CEMASYS
GRP pipe*	125,5		125,5	Portfolio report, CEMASYS
Steel pipe*	0,0			Portfolio report, CEMASYS
SubTotal:	**3 944,1**	**9,8**	**3 894,3**	

OPERATION & MAINTENANCE *Material description*	Input [tonnes]	Renewable [tonnes]	Non-renewable [tonnes]	*Source*
	0	0	0	*Not reported*
SubTotal:	**0**	**0**	**0**	

Tinfos AS *Material description*	Input [tonnes]	Renewable [tonnes]	Non-Renewable [tonnes]
Total input material flow:	**3944,1**	**9,8**	**3894,3**

*) Figures are reported in project year of completion. The following projects have been completed and are reported in 2025:
Frøytlandsfoss and Smådalselva

Table 1 - Input materials

Note: Office/administrative-related materials are not monitored as they are regarded neglible in 2025.

IMPROVEMENT TARGETS Baseline year: 2021

Material input

	Not started	Ongoing	Achieved
Identify and monitor key-input material flow in construction projects			○
Identify material product scope 3 climate footprint			○
Establish requirements for material input in RFQs and supplier contracts			○
Identify and monitor key-input material flow for production of electricity + O&M			○
Identify lower emissions options if applicable		○	
Set specific targets for reducing climate footprint from input material			○
Material reporting from internal projects	○		

Acchieved 2025: ○

Table 2 - Improvement Targets, Material Input

5.1.2 Methology retrieving material data

Input materials data for consumable supplies, such as explosives, in *hydropower plant construction projects* are reported regularly, usually each month, by main construction directly to our digital ESG tool - CEMAsys. Input materials such as cement, electromechanical components, rebar, wood and pipes are reported at project completion, and not regularly. Input materials data for *hydropower plant operation & maintenance* is regarded as negligible during normal operation. All the data retrieved is stored in our digital ESG register.

5.1.3 Data quality

The quality of data relies on adherence to contractual sustainability requirements by entrepreneurs. The procedures for material data collection appear to function satisfactorily. The data quality has been enhanced in 2025 by introducing a reporting wizard methodology, allowing contractors to report directly to our digital ESG register. The data provides a comprehensive overview necessary to identify key input materials, enabling us to set more specific targets for reducing the climate footprint of these materials in the future.

5.2 Waste generated by our activities

In 2025, Tinfos generated 38.5 tons of waste, of which 73% was recycled. We therefore met our waste management target. Tinfos sets project-specific procedures for monitoring and reporting ESG parameters during construction. These waste records help ensure compliance with regulatory requirements and support our goal of recycling more than 70% of waste

Total waste volumes were lower in 2025 than in the previous year due to reduced project activity and less waste from operations. In particular, metal and wood waste from operations declined, as some maintenance work on machinery and outdoor areas carried out in 2024 was not repeated in 2025. See tables below for details.

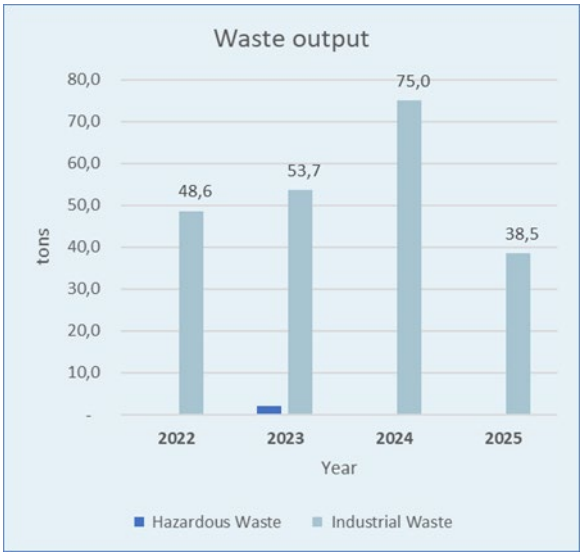


Figure 8 - Annual waste output

Waste fractions report Tinfos AS 2025 Jan - 2025 Dec

Field name	Unit	Total	Diverted from disposal						Directed to disposal		
			Incin. w/ energy recovery	Material recycling	Reuse	Animal feed	Composting	An.dig./biogas	Landfill	Incin. w/o energy recovery	Other disposal operations
Cardboard waste, recycled	kg	1 220,0	-	1 220,0	-	-	-	-	-	-	-
Commercial waste, landfill	kg	10 306,0	-	-	-	-	-	-	10 306,0	-	-
EE waste, recycled	kg	570,0	-	570,0	-	-	-	-	-	-	-
Glass and metal, recycled	m3	195,0	-	195,0	-	-	-	-	-	-	-
Metal copper waste, recycled	kg		-		-	-	-	-	-	-	-
Metal iron waste, recycled	kg		-		-	-	-	-	-	-	-
Metal waste, recycled	kg	1 150,0	-	1 150,0	-	-	-	-	-	-	-
Mineral oil waste, incinerated (H)	liters	-	-	-	-	-	-	-	-	-	-
Organic waste, composting	kg		-	-	-	-			-	-	-
Organic waste, incinerated	kg	980,0			-	-	-	980,0	-	-	-
Paper waste, recycled	kg	680,0	-	680,0	-	-	-	-	-	-	-
Plastic PP-folio waste, recycled	kg		-		-	-	-	-	-	-	-
Plastic waste, recycled	kg	760,0	-	760,0	-	-	-	-	-	-	-
Residual waste, incinerated	kg	11 680,0	11 680,0	-	-	-	-	-	-	-	-
Wood waste, incinerated	kg	10 990,0	10 990,0	-	-	-	-	-	-	-	-
Wood waste, recycled	kg		-		-	-	-	-	-	-	-
Total sum		**38 531,0**	**22 670,0**	**4 575,0**	**-**	**-**		**980,0**	**10 306,0**	**-**	**-**
Sorted waste share	**%**	**73,0**									
Share of total	**%**	**100,0**						**-**	**-**	**-**	**-**
Sum of non-hazardous waste		**38 531,0**						**-**	**-**	**-**	**-**
Percentage non-hazardous waste	**%**										
Sum of hazardous waste		**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Percentage hazardous waste	**%**	**-**									
Sum of radioactive waste		**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Percentage radioactive waste	**%**	**-**									

Table 3 – Waste fractions 2025

In 2025, residual waste (57%) and wood waste (29%) were the main waste fractions, and incineration was the main treatment method. However, 27 % of residual waste was sent to landfill, mainly reflecting waste reported from the Indonesian projects. Some waste from Norwegian projects was also classified as landfilled because no evidence of another treatment method was available. Waste segregation remains a key challenge in Indonesia, as it has not yet become a standard practice across large parts of the population. This is primarily due to infrastructure limitations and the lack of recycling facilities and waste management centers capable of processing and utilizing separated waste streams. Digital reporting has nevertheless been introduced to register waste fractions, and sorting and reporting will become more systematic in 2026. The development of non-hazardous and hazardous waste management plans has therefore been prioritized and will be implemented from 2026. See Figure 8 for details on waste fractions reported in 2025. Figure 9 shows the main treatment methods for waste from our activities.

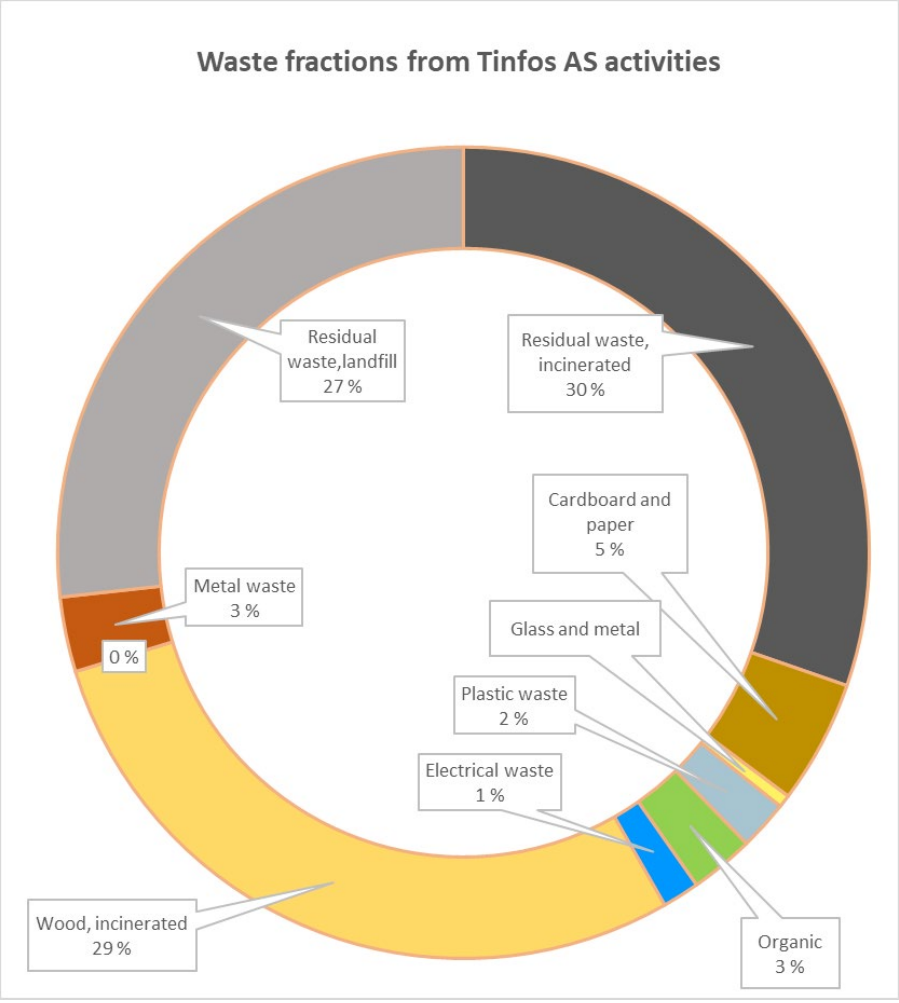


Figure 9 - Waste output by fraction (%)

Cardboard, paper, glass, metal, plastic, and electrical components are recycled for material recovery. Organic waste is treated through biogas production or composting and is also classified as recycled. In total, about 5.5 tons were recycled, representing 14% of total waste.

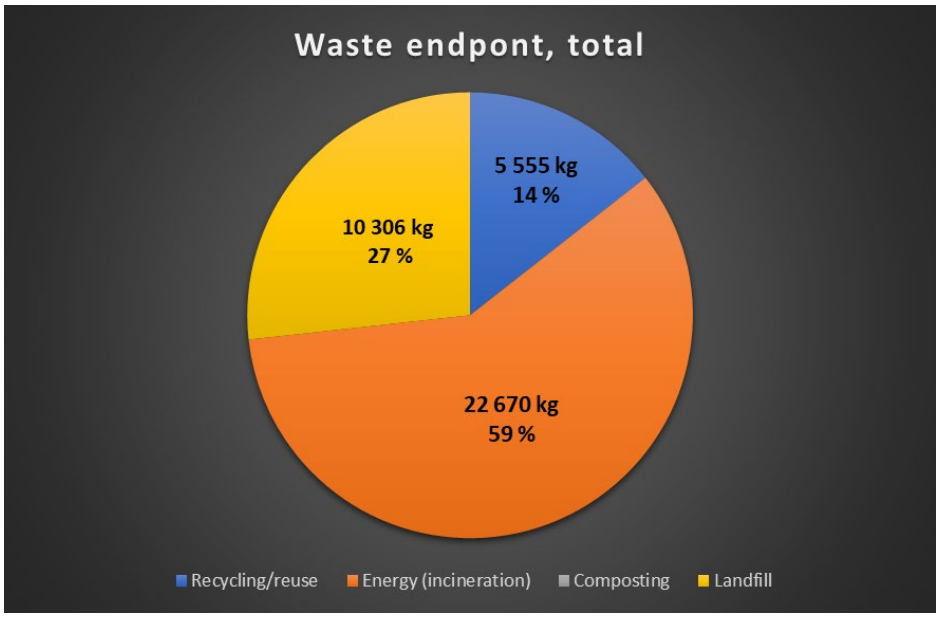


Figure 10 - Waste recycling and disposal

5.2.1 Retrieval of waste data

Main construction entrepreneurs report monthly waste data for *hydropower plant construction projects* in our digital ESG register, CEMAsys. This data, based on waste output, is recorded and organized by the ESG team in Tinfos.

Waste data for *hydropower plant operation & maintenance* is collected from the waste management companies where waste has been delivered by Tinfos. The reports are checked against financial filing of payments and invoices from the waste management companies used by Tinfos.

5.2.2 Waste data quality

We calculate our waste data from projects based on reports on waste output from our main entrepreneurs and suppliers in our projects.

Collected annual data reports from the waste management companies provide us with a high degree of accuracy.

IMPROVEMENT TARGETS Baseline year: 2021

Waste

	Not started	Ongoing	Achieved
Identify waste categories and establish a process for monitoring output waste			○
Establish method for calculating emmission footprint			○
Review and update waste management plan for operation, maintenance and electric power production.			○
Assess waste output and identify potential for reducing climate footprint from waste		○	
Set specific targets for reducing climate footprint from waste - if applicable	○		
Develop project specific management plan for hazardous and non-hazardous waste in Indonesia			○

Acchieved 2025: ○

Table 4 - Improvement targets, Waste

5.3 Energy input and production

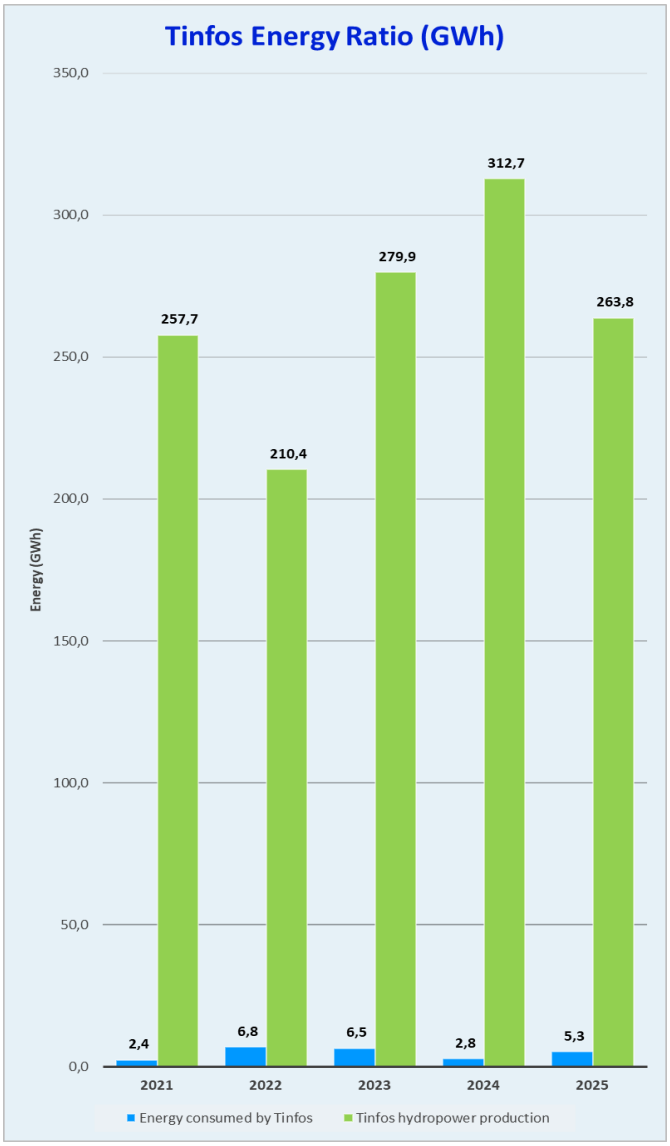


Figure 11 - Tinfos Annual Energy Ratio (GWh)

Tinfos Energy Ratio 2025 (kWh)

In 2025 Tinfos imported and used approximately 2,0% of energy compared to the amount of renewable hydropower energy produced and exported by the company owned hydropower plants.

The total energy consumption at Tinfos was 5,3 GWh.

At Notodden (N), the company owned hydropower plants Tinfos I and II produced 239 GWh while the hydropower plants Kobbhom/Valvatn in Finnmark (N) produced 23 GWh. Tinfos SPVs produced 1,8 GWh. A total of 263,8 GWh of renewable energy supplied.

Future targets
Total energy consumption:

	Target	Realized
2023:	7,5 GWh	6,5 GWh
2024:	7,5 GWh	4,5 GWh
2025:	7,5 GWh	5,3 GWh
2026:	7,5 GWh	

Future Targets
Electricity production at Tinfos owned hydropower plants:

	Target	Realized
2023:	268,7 GWh	279,9 GWh
2024:	268,7 GWh	312,7 GWh
2025:	242,0 GWh	263,8 Gwh
2026:	243,8 GWh	

Energy consumed by Tinfos activities and assets			
Energy consumed by source/location	**Total (kWh)**	**Renewable (kWh)**	**Non-Renewable (kWh)**
Tinfos Assets, electricity	1 740 771	1 660 696	80 075
Tinfos SPVs, electricity	0	0	0
Tinfos branch offices, electricity	29 500	13 898	15 602
Employee Commuting, Car - Diesel	104 962	0	104 962
Employee Commuting, Car - Petrol	8 731	0	8 731
Employee Commuting, Car - Hybrid	20 516	0	20 516
Employee Commuting, Car - Electric	861	821	40
Construction vehicles - Diesel	3 330 000	0	3 330 000
Construction power - Electricity	113 600	108 374	5 226
Tinfos Group Assets and offices	**1 770 271**	**1 674 594**	**95 677**
Construction project site activities	**3 443 600**	**108 374**	**5 226**
Commuting and business travel	**135 070**	**821**	**134 249**
TOTAL Tinfos (kWh)	**5 348 941**	**1 783 789**	**3 565 152**
TOTAL Tinfos (%)	**100 %**	**33 %**	**67 %**

Energy produced by Tinfos hydropower plants			
Energy produced by source/location	**Total (kWh)**	**Renewable (kWh)**	**Non-Renewable (kWh)**
Tinfos I/II	239 000 000	239 000 000	0
Kobbhom/Valvatn	23 000 000	23 000 000	0
Tinfos SPVs	1 800 000	1 800 000	
TOTAL Tinfos (kWh)	**263 800 000**	**263 800 000**	**0**
TOTAL Tinfos (%)	**100 %**	**100 %**	**0 %**

Table 5 - Energy used by Tinfos assets and activities

Table 5 above shows a detailed overview of the total energy consumption and energy production at Tinfos during 2025. The figures includes both hydropower plant construction projects, operation and administration.
The figures do not contain data related commuting by Tinfos employees in Indonesia.

The main sources of imported energy to Tinfos activities are renewable electricity used for the Tinfos assets and diesel for construction activities.
The total renewable hydropower production in 2025 was 263,8 GWh. The target for renewable hydropower production next year, in 2025, is reduced to 242 GWh due to planned maintenance of the hydropower plants at Notodden.

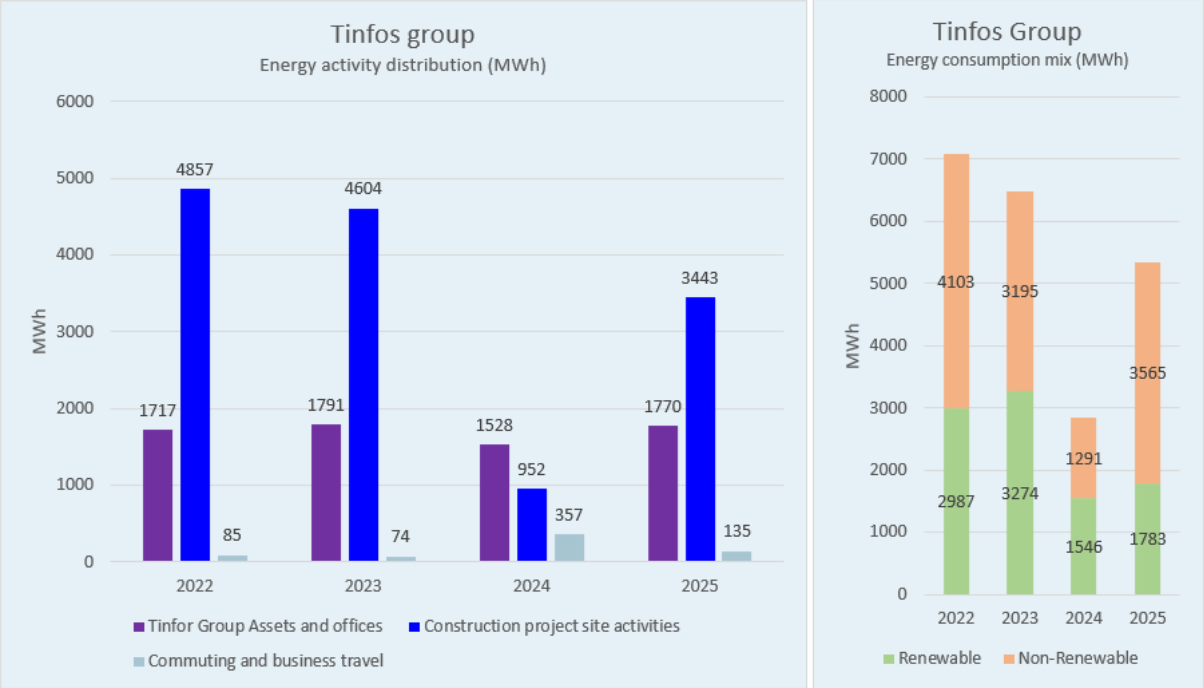


Figure 12 - Energy distribution and consumption mix (MWh)

Compared with 2024, energy use for field construction activities increased in 2025, mainly due to higher activity levels at project sites. Of Tinfos' total imported energy in 2025, 33% was renewable and used primarily for assets such as buildings and hydropower plants. The remaining 67% was non-renewable, consisting mainly of diesel used by construction vehicles and, to a lesser extent, for employee commuting and travel.

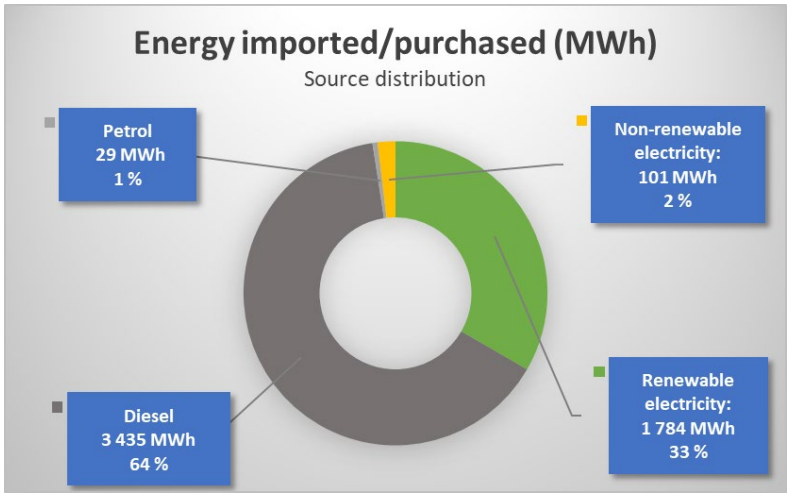


Figure 13 - Energy imported/purchased by source

IMPROVEMENT TARGETS

Baseline year: 2021

Energy

	Not started	Ongoing	Achieved
Identify all renewable energy produced by Tinfos			○
Identify all material energy consuming entities by source/location			○
Establish methodology to collect relevant energy data for each source/location			○
Establish initial calculation models to present all energy consumption in kWh for 2021			○
Review calculation models and refineto reduce uncertainty in the figures for 2022			○
Set specific targets to reduce energy consumption - if applicable			○
Esgablish routines of collecting travel and commuting data for branch offices abroad.	○		

Acchieved 2025: ○

Table 6 - Improvement targets, Energy

5.3.1 Method used to retrieve energy data

Tinfos assets and SPVs
Electricity consumption by Tinfos assets is measured in kilowatt-hours (kWh) and is obtained directly from the relevant electricity meters on elhub. (www.elhub.no)

Tinfos branch offices
The Tinfos branch offices are located in Rosendal in the western part of Norway, Lysaker in the eastern part of Norway and in Jakarta in Indonesia. The branches are relatively small office locations, where electricity and energy costs are included in the office rent.
By assuming a standard office space allocation per employee in a modern office building and estimating the annual energy consumption per square meter for buildings in both Norway and Indonesia, we can derive an estimate of energy consumption per employee. For each branch we multiply the energy consumption by the number of employees at the location to find a rough estimate of the energy consumed by Tinfos at each branch office.

When calculating how much of the energy use in Norwegian branch offices that are renewable and non-renewable we refer to NVE website on "power declarations".
(https://www.nve.no/energi/energisystem/energibruk/stroemdeklarasjoner/). Renewable sources contributed with 95,4% of the electric consumption in Norway in 2024. (Figures for 2025 not available at the time of reporting).

When calculating how much of the energy use in Jakarta branch offices that are renewable and non-renewable we refer to East Asia Forum article "*Indonesia's energy transition needs a decentralised approach*":
(https://eastasiaforum.org/2025/02/05/indonesias-energy-transition-needs-a-decentralised-approach/)
Renewable sources contributed with 13,9% of the electric consumption in Indonesia in 2024.

Vehicles
Financial filings in Xledger (accountancy software) of travel expences for employees contain kilometers (km) travelled and the fuel-type used by vehicles during 2025.

To calculate energy consumption, we upload collected data to our digital ESG system supplied by CEMAsys, where scientific factors are established within the system by CEMAsys, providing figures showing total energy consumption (kWh) for all types of vehicles and energy sources.

Construction projects
The energy consumption in construction projects consists of three main components:
- Fuel consumption, construction machinery
- On site Electric power consumption
- Employee commuting

The main entrepreneurs at construction site report consumption data for each required component to Tinfos each month. To calculate energy consumption, we upload collected data to our digital ESG system supplied by CEMAsys, where scientific factors are established within the system by CEMAsys, providing figures showing total energy consumption (kWh) for all types of vehicles and energy sources.

Business travel by train and airplane
The amount of energy used by Tinfos for train and airplane travels in 2025 is negligible and is not included in the energy calculation.

5.3.2 Uncertainties about the energy data quality

Tinfos assets and SPVs
Electricity consumption data for Tinfos assets has low uncertainty and is considered accurate.

Tinfos branch offices
Estimating electricity consumption at Tinfos branch offices involves a high degree of uncertainty. However, because the total energy use is relatively small, the impact of this uncertainty is limited. The methodology is therefore considered appropriate.

Private cars (Diesel, Gasolin, Hybrid, Electric)
The uncertainty in estimating fuel consumption for private cars is moderate, as the calculation does not account for factors such as vehicle load, number of passengers or vehicle class. It is based only on vehicle type, fuel type and distance travelled.

Construction projects
The uncertainty associated with construction projects often stems from the supplier's capacity to provide accurate reports.

Travelling data from branch office in Jakarta, Indonesia
We have yet to establish routines for collecting travel data from our Jakarta branch office. The construction of the access road to the Nagajaya project began at the end of 2024. Data for site activities from the Nagajaya project are included in this sustainability report for 2025.

Nagajaya, Indonesia, Access road

5.4 Greenhouse gas (GHG) emissions

Tinfos 2025
Total GHG emissions:
2 459,3 tCO_2e

Total GHG emissions from Tinfos activities

Our materiality assessment shows that climate change mitigation is a material issue for Tinfos' stakeholders. We therefore make an effort to present the climate footprint from all our activities in tCO_2e. We have established scientific methodologies for greenhouse gas emission calculations by implementing the digital CEMAsys carbon footprint module. In 2025 Tinfos' activities resulted in 2 459,3 tons CO_2e of total GHG emissions. 53,9% (1 325,7 tons CO_2e) of the emissions originated from purchased goods and services in construction projects.

Reduced GHG emissions by Tinfos hydropower production

Tinfos' main contribution to climate change mitigation is to produce renewable electricity from hydropower. To create a picture of the climate change mitigation from Tinfos' owned hydropower plants we assume that our produced renewable energy replaces an energy body like the EU electricity mix. According to the European Environment Agency the greenhouse gas emission intensity of EU power generation by using 1 kilowatt hour EU27 2024 was 187 gCO_2e/kWh. Using this figure on GHG emission intensity we find that Tinfos' owned hydro power plant renewable production of 263,8 GWh of electricity in 2025 corresponds to a reduction of greenhouse gas emissions of 49 217 metric tons of CO_2e.

Tinfos 2025
GHG emissions avoided by Tinfos I/II and Kobbholm/ Valvatn Powerplants:
49 217 tCO_2e

Reduced GHG emissions by indirect hydropower production

By utilizing the same method as stated above for all hydropower plants that have been built by Tinfos since 2009, we find that they represent an additional production of 394,6 GWh for 2025. That means that Tinfos in addition to avoiding GHG emissions of 49 217 tons CO_2e from our own hydropower plants, contributed indirectly to an additional reduction of greenhouse gas emissions of 73 822 metric tons of CO_2e avoided. It is important, however, to emphasize that these hydropower facilities have been purchased by - and transferred to - our clients and customers. They are now the rightful owners of these hydropower facilities and have most likely, if they are reporting on sustainability, included this contribution to climate change mitigation in their own sustainability report.

Tinfos 2025
GHG emmissions avoided by Small Hydro power plants built by Tinfos since 2009:
73 822 tCO_2e

Tinfos future targets:
Total GHG-emissions

	Target	Realized
2023:	2000 tCO_2e	1378 tCO_2e
2024:	1300 tCO_2e	3425 tCO_2e
2025:	3000 tCO_2e	2459 tCO_2e
2026:	3500 tCO_2e	

Tinfos future targets:
Reduced GHG emissions

	Target	Realized
2023:	70 000 tCO_2e	70 255 tCO_2e
2024:	70 000 tCO_2e	65 268 tCO_2e
2025:	50 000* tCO_2e	49 217 tCO_2e
2026:	50 000*	

* Reduced target due to planned maintenance of hydropower plants

Figure 14 - GHG emission targets

The GHG Protocol is the most widely used international accounting tool for climate gas emissions. Tinfos use the definitions by the GHG Protocol which categorizes greenhouse gas (GHG) emissions in three groups or scopes. The scopes as defined by the GHG protocol are as follows:

GHG Protocol – GHG emissions scope definitions		
Scope 1 **Direct GHG emissions**	**Scope 2** **Electricity indirect GHG emissions**	**Scope 3** **Other indirect GHG emissions**
Direct GHG emissions occur from sources that are owned or controlled by the company, for example emissions from combustion in owned or controlled boilers, furnaces, vehicles, etc.; emissions from chemical production in owned or controlled process equipment.	Accounts for GHG emissions from the generation of purchased electricity consumed by the company. Purchased electricity is defined as electricity that is purchased or otherwise brought into the organizational boundary of the company. Scope 2 emissions physically occur at the facility where electricity is generated.	Scope 3 is an optional reporting category that allows for the treatment of all other indirect emissions. Scope 3 emissions are a consequence of the activities of the company but occur from sources not owned or controlled by the company. Some examples are extraction and construction of purchased materials; transportation of purchased fuels; use of sold products and services, business travel, waste disposal, transportation of products, employee commuting.

Figure 15 - GHG emissions scope definitions

In 2024, Tinfos successfully completed the planned identification and reporting of material scope 3 emissions, including purchased goods and services, waste output, business travel, and employee commuting. Over the past year, we finalized the reporting of carbon footprints for Smådalselva and Frøytlandsfoss projects, as part of our commitment to comprehensive GHG monitoring.

Material scope 3 sources, such as cement, electromechanical equipment, steel/rebar, wood, and pipes, has been thoroughly evaluated at project completion since 2024 year. In collaboration with CEMAsys, we established scientific conversion factors to calculate the total lifecycle footprint for each project. This enabled us to report on all relevant scope 3 emissions in alignment with our project timelines and sustainability goals. This milestone marks a significant achievement in our ongoing efforts to enhance transparency and accountability in carbon accounting.

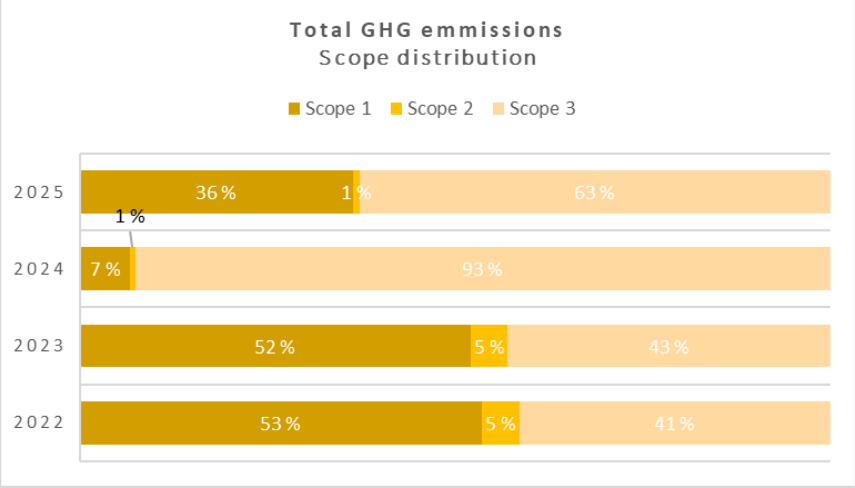


Figure 16 - Annual GHG emmissions scope distribution

Carbon accounting is a fundamental tool in identifying tangible measures to reduce GHG emissions. The annual carbon accounting report enables the organization to benchmark performance indicators and evaluate progress over time.

The input data is based on consumption data from internal and external sources, which are converted into tons CO_2-equivalents (tCO_2e). The carbon footprint analysis is based on the international standard; *A Corporate Accounting and Reporting Standard*, developed by the Greenhouse Gas Protocol Initiative (GHG Protocol). The GHG Protocol is the most widely used and recognized international standard for measuring greenhouse gas emissions and is the basis for the ISO standard 14064-I.

GHG emissions from Tinfos activities

Total GHG emmissions from Tinfos Activities [tCO2e]:						
Emission source	**Energy source**	**Total kWh**	**Renewable kWh**	**Non-Renewable kWh**	**Tinfos AS tCO_2e**	*GHG Protocol classification*
Transportation, Construction vehicles	Diesel	3 330 000	0	3 330 000	**892,2**	Scope 1
Construction Power, building site	Electricity	113 600	108 374	5 226	**3,9**	Scope 2
Tinfos Assets and Offices	Electricity	1 770 271	1 674 594	95 677	**19,3**	Scope 2
SPVs	Electricity	0	0	0	**0,0**	Scope 2
Employee Commuting, Car - Diesel	Diesel	104 962	0	104 962	**23,8**	Scope 3
Employee Commuting, Car - Petrol	Petrol	8 731	0	8 731	**23,4**	Scope 3
Employee Commuting, Car - Hybrid	Petrol	20 516	0	20 516	**4,5**	Scope 3
Employee Commuting, Car - Electric	Electricity	861	821	40	**0,0**	Scope 3
Business travel, Air travel	Aviation fuel				**158,5**	Scope 3
Waste	-				**8,0**	Scope 3
Purchased Goods and Services*	-				**1 325,7**	Scope 3
			Total Tinfos tCO2e:		**2 459,3**	

*Scope 3 GHG-emissions from main purchased goods and services				
Emission source	**Metric tonnes**	**Conversion factors [tCO2e/t material]**	**Tinfos AS tCO_2e**	*GHG Protocol classification*
Concrete/Cement	3 452,4	CEMAsys	**472**	Scope 3
Explosives	8,9	CEMAsys	**12**	Scope 3
Steel el/mech components	189,2	CEMAsys	**593**	Scope 3
Rebar (steel)	118,3	CEMAsys	**23**	Scope 3
Wood	9,8	CEMAsys	**15**	Scope 3
GRP pipe	125,5	CEMAsys	**211**	Scope 3
Steel pipe	0,0	CEMAsys	**0**	Scope 3
		Purchased goods and services	**1325,7**	

Table 7 - GHG emissions Tinfos 2024

IMPROVEMENT TARGETS Baseline year: 2021

GHG emissions

	Not started	Ongoing	Achieved
Establish preliminary GHG calculation methodology caused by Tinfos' activities			○
Establish scientific GHG calculation methodology caused by Tinfos' activities			○
Establish scientific GHG lifecycle calculation methodology caused by Tinfos' purchased goods and services.			○
Identification of emission sources in all of Tinfos activities			○
Establish preliminary methodologies to calcalculate emissions in tCO2e for each source			○
Establish scientific methodologies to calculate emissions in tCO_2e for each source			○
Establish procedures for monitoring and reporting key data parameters			○
Set specific targets for reducing GHG emissions - if applicable			○

Acchieved 2025: ○

Table 8 - Improvement targets, GHG emissions

Hydropower projects may last more than a year. To ensure correct information regarding purchased goods, Tinfos reports such data at the end of the project. Tinfos has included the completion of Smådalselva and Frøytlandsfoss in the 2025 report. This includes the lifecycle GHG footprints of main material flows such as concrete/cement, explosives, steel/electro-mechanical equipment, GRP piping, rebars, steel bars, and wood. In addition, we are reporting on GHG-emissions from waste handling, fuel and energy used on construction site and assets, project related personnel commuting and business travel.

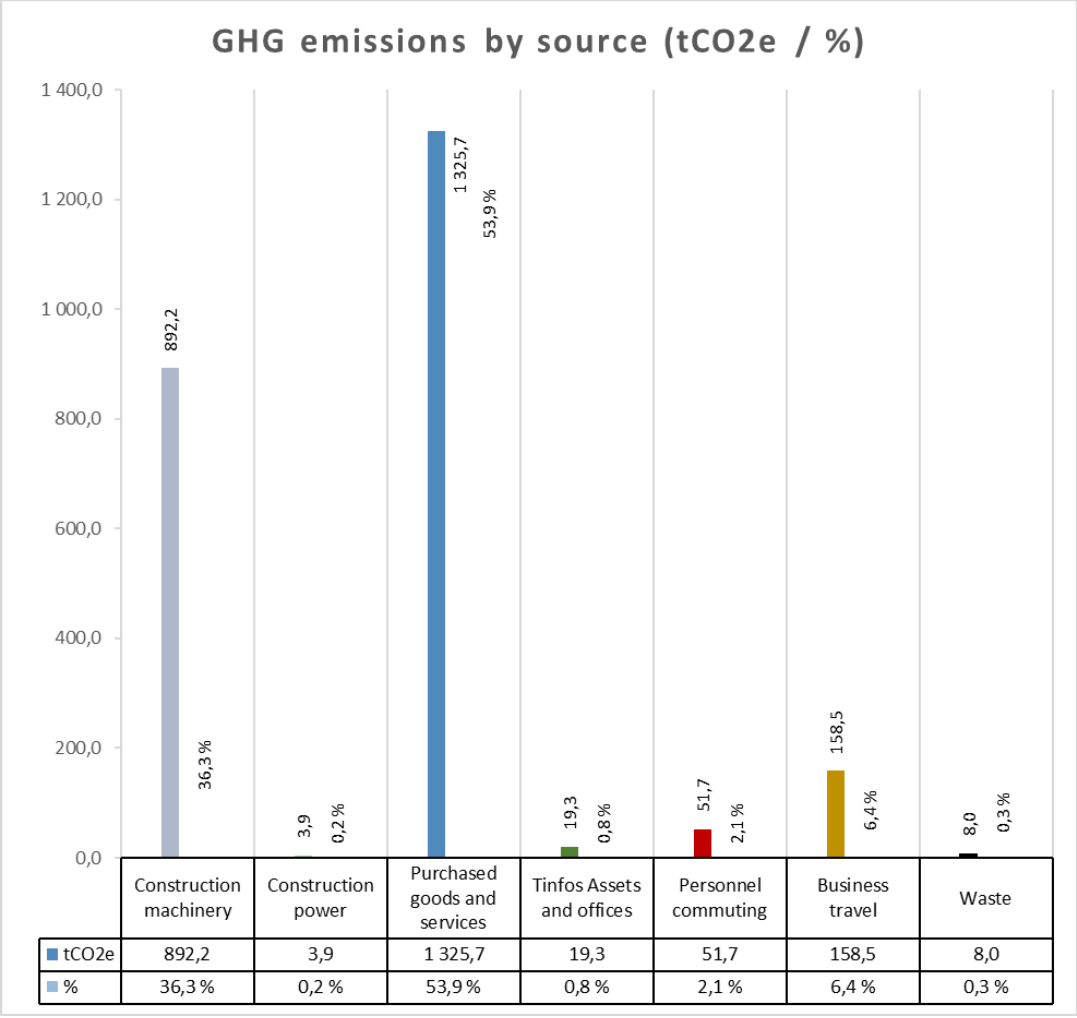


Figure 17 - GHG emissions by source

5.4.1 Methodology and sources

The Greenhouse Gas Protocol initiative (GHG Protocol) was developed by the World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD). This analysis is done according to A Corporate Accounting and Reporting Standard Revised edition, currently one of four GHG Protocol accounting standards on calculating and reporting GHG emissions. The reporting considers the following greenhouse gases, all converted into CO_2-equivalents: CO_2, CH_4 (methane), N_2O, SF_6, HFCs, PFCs and NF_3.

For corporate reporting, two distinct approaches can be used to consolidate GHG emissions: the equity share approach and the control approach. The most common consolidation approach is the control approach, which can be defined in either financial or operational terms.

The carbon inventory is divided into three main scopes of direct and indirect emissions.

The electricity emission factors used in our CEMAsys ESG register are based on national gross electricity production mixes from the International Energy Agency's statistics (IEA Stat). Emission factors per fuel type are based on assumptions in the IEA methodological framework. Factors for district heating/cooling are either based on actual (local) production mixes, or average IEA statistics.

In January 2015, the GHG Protocol published new guidelines for calculating emissions from electricity consumption. Primarily two methods are used to "allocate" the GHG emissions created by electricity generation to the end consumers of a given grid. These are the location-based and the market-based methods. The location-based method reflects the average emission intensity of the grids on which energy consumption occurs, while the market-based method reflects emissions from electricity that companies have purposefully chosen (or not chosen).

In this report the location-based method is utilized: The location-based method is based on statistical emissions information and electricity output aggregated and averaged within a defined geographic boundary and during a defined time period. Within this boundary, the different energy producers utilize a mix of energy resources, where the use of fossil fuels (coal, oil, and gas) result in direct GHG emissions. These emissions are reflected in the location-based emission factor.

Tinfos and supplier air travel

For flight travel calculations in 2025, we have obtained data (kilometers flown) from our Travel Agency Berg-Hansen, combined with emission factors from the CEMAsys ESG register.

5.5 COMMUNICATION ON PROGRESS (COP) AND THE TRANSPARENCY ACT

We are convinced that the active participation of business and industry is crucial for the world to succeed in achieving UN's sustainability goals. That is why we in May 2021 formalized our commitments through our membership in the world's largest corporate sustainability initiative – the UN Global Compact.

Our commitment to the ten principles of UN Global Compact has spurred our focus on sustainability and good governance in the four areas Human Rights, Labor, Environment and Anti-Corruption in a more systematic and target-based manner than previously.

Read more at about UN Global Compact:
www.globalcompact.no
www.unglobalcompact.org

By committing to the UN Global Compact, we provide an annual Communication on Progress (COP) report detailing our actions to uphold its ten principles in our business strategy, culture, and operations. Our COP summary is included in this sustainability report and submitted to the UN Global Compact's CoP Digital Platform. This report is available to all stakeholders and the public on our website.

On 1 July 2022, the Norwegian Transparency Act (Åpenhetsloven) entered into force. The Act aims to promote respect for fundamental human rights and decent working conditions in enterprises and to ensure public access to information on how companies identify and address adverse impacts related to human rights and labour conditions.

The Transparency Act is closely aligned with internationally recognised frameworks for responsible business conduct. In particular, it is based on the OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct, which establish a risk-based approach for managing potential negative impacts. The Act also reflects the principles set out in the UN Guiding Principles on Business and Human Rights (UNGP), which form the global standard for corporate responsibility in this area.

In line with the requirements of the Transparency Act, Tinfos has implemented annual due diligence processes covering its own operations, business relationships, and supply chains. These processes are designed to be consistent with OECD-aligned due diligence methodologies and integrated into the company's broader environmental and social management system. Tinfos publishes an annual account of its due diligence assessments in accordance with the Act, which is available on the company's website.

IMPROVEMENT TARGETS Baseline year: 2021

COP and the Tranparency Act	Not started	Ongoing	Achieved
Decision to commit to the ESG leadership standard and principles of the UN Global Compact.			○
Establish an ESG supplier declaration of conformity communicating our expectations to implement the 10 principles in our value chain.			○
Release the first Tinfos COP within Q2 2022			○
Staff training to increase awareness of UN Global Compact's 10 principles and the COP.		○	
Establish process for supply chain implementation and management for all 10 principles.			○
Due Dilligence on responsible business conduct according to the Transparency Act			○

Acchieved 2025: ○

Table 9 - Improvement targets, COP

5.6 Human Rights

Tinfos respects and supports the universal declaration of human rights of all individuals and stakeholders who could potentially be impacted by our business. Tinfos board of Directors and executive leadership are actively involved in approving and following up on disclosures and actions related to Human Rights.

Tinfos adheres to the Norwegian Transparency Act and the OECD Guidelines for Responsible Business Conduct. This means the company is committed to conducting due diligence to identify, prevent, and mitigate adverse impacts on human rights and decent working conditions—both within its own operations and throughout the supply chain.

Due diligence is carried out systematically and regularly, including risk and vulnerability assessments for each human right for markets in both Norway and Indonesia, and materiality assessments and stakeholder mapping is conducted to ensure relevance and focus in our project activities.

Tinfos has implemented several measures to ensure compliance and continuous improvement including integration of human rights commitments into ethical guidelines and supplier declarations, training programs for employees on ESG and human rights and enhanced focus on establishing procedure for supply chain management processes which includes human rights.

UN GLOBAL COMPACT

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses

We request that employees, suppliers, local communities, and other stakeholders inform us through our grievance redress mechanisms about any conditions that may involve human rights violations associated with Tinfos' activities, so that we can take appropriate action.
We establish project-specific grievance redress mechanisms for each project, using various methodologies to address grievances and complaints, with a focus on local communities affected by our activities and employees of contractors working in our projects.

IMPROVEMENT TARGETS Baseline year: 2021

Human rights

	Not started	Ongoing	Achieved
Include our human rights commitment the Tinfos Code of Conduct.			○
Establish an ESG supplier declaration of confirmity including human rights commitment			○
Communitcate our CoC and ESG supplier declaration to our stakeholders and public on web			○
ESG-introduction for our staff at Tinfos including our human rights commitment			○
Make a risk assessment of all human rights to identify material human rights relevant for Tinfos activities			○
Establish processes for supply chain management including human rights assessments			○
Establish regular training programs for all employees related to CoC and human rights		○	

Acchieved 2025: ○

Table 10 - Improvement targets, Human rights

Observed human rights violations will be identified as ESG-non conformances and registered and handled in our non-conformance system. We did not receive any reports from our suppliers or other stakeholders, either directly or by the grievance redress mechanisms, related to human rights violations in relation to Tinfos' activities in 2025.

5.7 Gender equality

Report on gender equality

In Tinfos AS there are 26% women and 74% men.
In the Tinfos Group there are 27% women and 73% men.

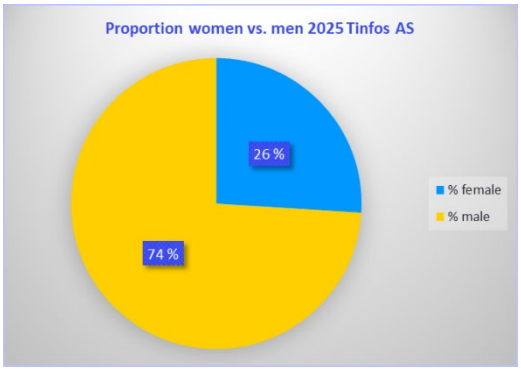


Figure 18 - Gender composition in Tinfos

The ratio of basic salary and remuneration between women and men for each employee category at Tinfos AS, as defined by the NSRS standard, is calculated using the formula: average salary for women divided by average salary for men within each category. A ratio greater than 1 indicates that women, on average, earn a higher salary in that category, while a ratio less than 1 means that men, on average, earn more.

The figure below indicates that the average salary for women exceeds that for men in the categories of *Mid management* and *Administration/Finance staff*. Conversely, the average salary for women is lower than that for men in the categories of *Leaders* and *Technical/Project staff*.

The average salary for women is 16% lower than the average salary for men at Tinfos, as it was last year. This difference is primarily due to the fact that only 18% of leadership and mid-management positions were held by women in 2025.

In 2025, the average salary gap between women and men decreased in all categories within the company, except for the Leaders category, where the gap increased.

The following figure encompasses all employees, excluding the Chief Executive Officer.

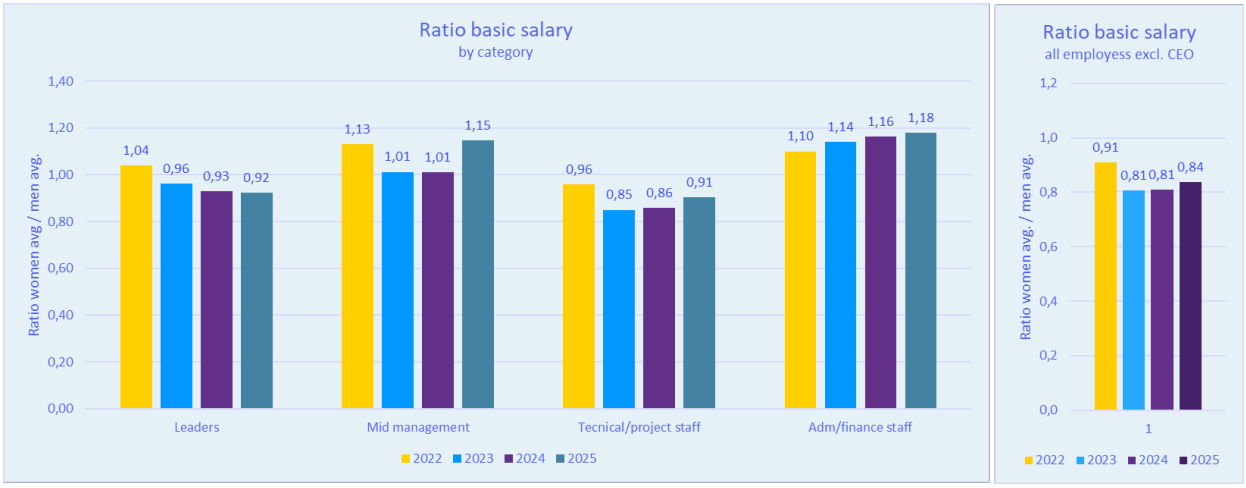


Figure 19 - Ratio of basic salary (women avg./men avg.)

5.8 Labour

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. This principle is made transparent to our stakeholders and to the public on our webpages.

We have integrated the principle of right of employees to form and join trade unions, and our recognition of the right of employees to conduct collective bargaining, in our policies and our in Code of Conduct.

The Tinfos Code of Conduct states that we do 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.

We regard our employees as our most important asset, and we put the health and safety of our workers, and those we work with, first. The Norwegian Working Environment Act together with the Internal Control Regulations contain requirements for the enterprise's own activity about systematic HSE work. The systematic HSE work in Tinfos AS, including labour conditions and working environment, is described in our Health, Safety and Environment Annual Report for 2024, available on our webpages.

UN GLOBAL COMPACT

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: the elimination of all forms of forced and compulsory labor;

Principle 5: the effective abolition of child labor; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Read more at about Tinfos' work on sustainability and social responsibility:

https://www.tinfos.no/en/sustainability-and-social-responsibility/

IMPROVEMENT TARGETS Baseline year: 2021

Labour (N)	Not started	Ongoing	Achieved
Include labor as a topic in our sustainability policy.			○
Include the right to form and join trade unions and to engage in collective bargaining in the Code of Conduct.			○
Report systematic HSE (Health, Safety, and Environment) efforts in the annual report.			○
Communicate our labor policy and relevant reports to our stakeholders and the public online.			○
Establish an ESG supplier declaration of compliance, including labor policy.			○
Establish processes for supply chain management, including labor and HSE assessments.			○
Establish new and updated HSE requirements that include conditions related to decent work.			○
Conduct a risk assessment related to the material social topics identified in the materiality assessment.			○
Establish procedures for spot checks/audits of suppliers with a specific focus on wages, safety, and accommodation conditions for contracted labor.		○	

Acchieved 2025: ○

Table 11 - Improvement targets, Labour, Norwegian market

As part of our international expansion, we have prioritized the establishment of robust frameworks to ensure decent working conditions for contractor employees engaged in our infrastructure projects in Indonesia. In alignment with the IFC Performance Standards on Environmental and Social Sustainability, we have implemented tailored planning and monitoring tools that address key sustainability themes, including labour rights and human dignity. Our due diligence assessments have identified elevated risks related to forced labour, occupational safety, and wage conditions in the Indonesian context. In response, we have introduced enhanced contractual requirements for all contractors, including mandatory compliance with our ESG Code of Conduct, and we are preparing processes for supplier audits and site inspections. Independent ESG consultants are engaged to conduct environmental and social impact assessments (ESIA) in our projects, and our project managers are held accountable for ensuring that all health, safety, and labor standards are fully integrated into the project execution. These measures reflect our commitment to responsible business conduct and to safeguarding the rights and well-being of all workers across our value chain.

IMPROVEMENT TARGETS Baseline year: 2021

Labour (ID)

	Not started	Ongoing	Achieved
Include labour as a topic in our sustainability policy regarding governance (ref. PS2-8)			○
Include right to form and trade unions and collective bargaining in Code of Conduct (ref. PS2-10, 13,14)			○
Report systematic HSE activities in annual report 2022			○
Communicate our labour policies and relevant reports to our stakeholders and public on web			○
Establish an ESG supplier declaration of conformity including labour policies			○
Establish project grievance mechanisms for workers (including hired workers) and their organisations (PS2-20,26)			○
Establish group policies and instruction to follow ILO's requirements for child labor where national laws do not have provisions. (PS2-21)			○
Establish group policies on forced or involuntary labour, including trafficed persons. (PS2-22)			○
Establish processes for supply chain management including labour and HSE assessments			○
Establish project communication and information plans for workers related to workers rights (ref. PS2-9)		○	
Establish project procedures identify migrant workers to ensure equal terms and conditions (ref. PS2-11)		○	
Establish project management procedures of worker's accommodation and provision of basic services (ref. PS2-12)			○
Establish project employment procedures based on principle of equal opportunity and fair treatment (PS2-15,16,17)		○	
Establish project retrenchment procedures based on principle of equal opportunity and fair treatment (PS2-18,19)	○		
Establish project procedures to identify, assess and manage potential hazards to workers (PS2-23)			○
Establish group policies and instruction to ascertain that third parties engaging hired workers are reputable and legitimate enterprises and have an appropriate ESMS. (PS2-24,25,26)		○	
Establish policies and procedures for managing and monitoring performance of third-party employers on issues related to hired workers. (PS2-25)	○		
Establish project supply chain assessment and monitoring programs on child labor, forced labor and safety issues related to supply chain workers with the goal to maintain relations with suppliers that can demonstrate that they are complying with the IFC Performance Standard 2. (PS2-27,28,29)		○	
Conduct risk assessment related to material social topics identified in materiality assessment.			○
Incorporate clearer contractual requirements for suppliers regarding decent wages in accordance with Indonesian laws and regulations.			○

Acchieved 2025: ○

Table 12 - Improvement targets, Labour Indonesia

All observed labor and HSE non-conformances are registered, classified, and processed as ESG non-conformances in our non-conformance system.
In 2025, 133 non-conformances related to labour and working conditions were reported, processed, and closed according to our non-conformance management procedures.

5.9 Environment and biodiversity

5.9.1 Environmental measures

Hydropower development in and around waterways affect local ecosystems. Tinfos therefore implements mitigation measures to reduce adverse impacts and support ecosystem function. Environmental measures may include preserving riverbank vegetation, restoring bird nesting sites, reducing erosion, protecting and restoring fish spawning habitats and establishing effective upstream and downstream migration solutions for migratory fish species. These measures are based on concession conditions, input from stakeholders, landowners, local authorities.

In Norway, environmental impacts are managed through environmental, landscape and technical plans. In international projects, third-party

UN GLOBAL COMPACT

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Environmental and Social Impact Assessments (ESIA) make base for a more detailed Environmental and Social Management Plan (ESMP) and a related action plan (ESAP). In 2025, Tinfos followed up or initiated mitigation measures in three Norwegian projects *(Smådalselva, Stårheim, and Frøytlandsfoss*) and one Indonesian project (*Nagajaya*) in addition to Tinfos operations activities.

Project Stårheim*:* In 2025, environmental measures focused on supporting local bird and fish habitats. Several nesting boxes were installed for the white-throated dipper (*Cinclus cinclus)* in locations suited to the species' habitat requirements. Site inspections were also carried out in collaboration with freshwater ecology specialists to support the local river owners' association in developing an action plan to improve Atlantic salmon recruitment.

Stårheimselva has historically supported large salmon populations, but natural flooding and overgrowth in side channels have reduced the availability of suitable juvenile habitat. As the main anadromous stretch is located downstream of the hydropower outlet, the project does not adversely affect spawning or nursery conditions for migratory fish. Instead, it demonstrates how targeted measures and local collaboration can improve habitat conditions and support future recruitment in the river. In 2025, funds earmarked for fish-related measures were used to support collaboration with the local river owners' association on the development of an action plan. Work on the action plan and restoration measures will continue in 2026 under the ownership and monitoring of the local river owners' association.

Installation of hatching boxes under a side river bridge. Photo: Marianne Kanstad

Project Smådalselva: Measures included preserving protected habitat features, such as old pine and ash trees identified within the land use plan. These trees were marked and safeguarded during construction. Final landscaping retained the surrounding vegetation and moving blasted rock from the terrain. No specific measures were required for fish migration or nesting sites. However, the project included restoration of a hiking trail crossing the constructions area, reflecting both environmental and social considerations related to landscape and public access.

In 2025, **Tinfos Operation** completed fish surveys in the Kobbholm watercourse as part of the follow-up of environmental management conditions related to the regulation of Viksjøen, Trillingvatn, Store Valvatn and Store Kobbholmsvatn in Sør-Varanger. Surveys carried out in 2023 and 2024 showed moderate to dense populations of trout and Arctic char, with no indication of recruitment failure in the lakes surveyed.

Based on the results, NVE withdrew further survey requirements for Trillingvatnet and Storvatnet. Through these investigations, Tinfos has fulfilled its licence obligations to assess regulated water bodies in relation to potential mitigation measures. No mitigation measures were required, as recruitment was considered sufficient. Photo under shows

Project Nagajaya: The Project has been developed in line with international environmental and social standards, with particular attention to biodiversity and sustainable resource management. Measures include erosion and sediment control, rehabilitation of disturbed areas, and actions to maintain habitat connectivity and reduce disturbance to fauna during construction and operation. Independent third-party consultants carry out structured monitoring to track impacts and support timely mitigation where needed.

The ESIA identifies the area as a modified landscape with ecological value and proximity to recognized biodiversity areas.

Picture from Store Kobbholm lake and the powerhouse with outlet to Barentshavet. Photo Bernt Nilsen

5.9.2 Biodiversity management

Final landscaping is a key phase in all our projects. We restore disturbed areas to blend with the surrounding landscape, using local soil wherever possible. This helps preserve ecological balance, supports biodiversity, and reduces the risk of introducing non-native species to affected ecosystems.

In **Project Smådalselva,** the area for the power station and intake has been removed, as well as the road to the intake. Final rounding was done in 2025 and therefore indicated with 0 Ha in the table below for 2025. Habitat protected in this project means areas within the land use plan that have been chosen to be retained, such as older trees.

In **Project Frøytlandsfoss**, surface soil from the intake, power station, and road areas was removed, but grazing and edge vegetation zones were protected. Restored areas in 2025 are linked to the final landscaping.

Project Stårheim started in the fall of 2024, and land preparation for the pipeline, intake, and power station has been used during 2025. Top soil masses was removed and preserved for final rounding and landscaping, planned springtime 2026.

At the **Nagajaya project,** construction of the access road began in spring 2025 and involved significant soil movement. Much of the excavated material was reused and shaped to blend into the surrounding landscape. Due to the tropical climate, revegetation started quickly, and within a few months the disturbed areas were covered by small trees and ground vegetation.

Affected areas stated in hectars Ha	Habitat removed	Habitat enchanged or restored	Habitat protected (on-site)	Habitat maintained
Frøytlandsfoss	1,2	0,8	0,04	0
Smådalselva	4	3,7	0,2	0
Stårheim	6,7	6,3	0,1	
Kvernevatn	0,8	Autumn 2026		
Nagajaya,				
SUM Ha	**12,7**	**10,8**	**0,34**	**0**

Table 13 - Habitat management in our projects 2025. Areas for Nagajaya will be updated in Version 2.



Pictures from mapping spawning pits in the river, downstream of the hydropower outlet. Photo: Marianne Kanstad.
Two pictures from Stårheim in the 1970-1980`s showing salmon catched in the river back then. Photos from Irvin Yri.

5.9.3 Water withdrawals / discharges

As part of our commitment to responsible water stewardship, we continuously monitor and report on water withdrawals and discharges across our hydropower operations. Each year, we track the volume of water withdrawn from natural sources and returned to the water system after use in energy generation in our hydropower plants. Since hydropower operates in a closed-loop system with minimal consumptive use, most of the water is discharged back into the environment under controlled conditions. By maintaining records and ensuring compliance with environmental standards, we aim to safeguard local ecosystems and contribute to the sustainable management of shared water resources. Transparent reporting of these figures reflects our dedication to minimizing environmental impact while supporting long-term, renewable energy production. In 2025 a total of 3 426 000 000 000 litres of surface water with freshwater quality passed through our turbines to produce 263,8 GWh of renewable hydropower energy.

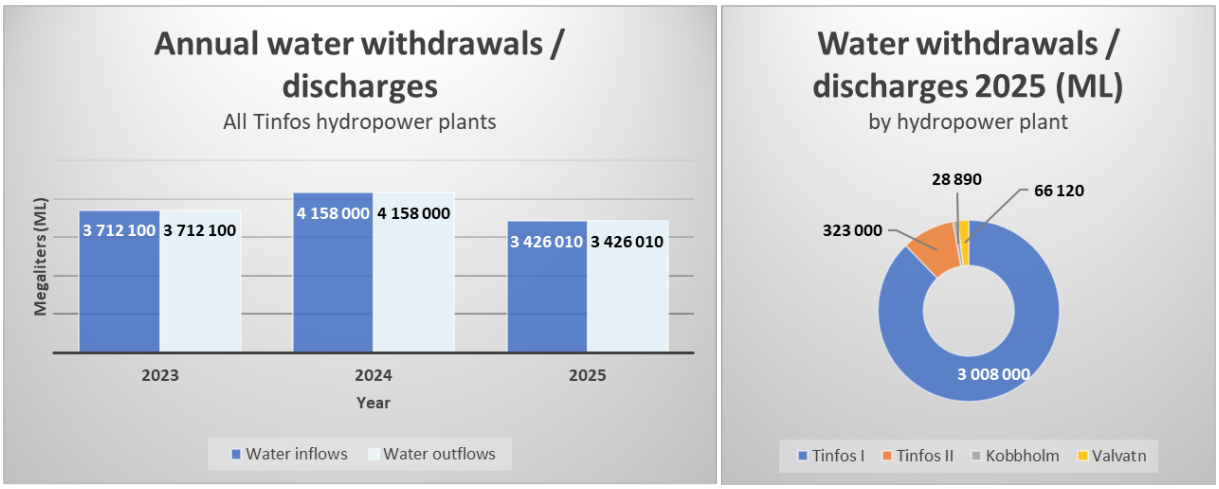


Figure 20 - Water withdrawals and discharges

IMPROVEMENT TARGETS Baseline year: 2021

Environment	Not started	Ongoing	Achieved
Training staff to become certified user of IHA's Hydropower Sustainability Tools.			○
Establish environmental action plans (EAP/Nw.: MOP) in ongoing projects			○
Sustainability policy for environmental topics from Materiality Assessment			○
Enhance non-conformance system to include registration and reporting ESG non-conformances			○
Establish procedures in hydropower project enableing monotoring of input materials and GHG			○
Establish ESMS (Environmental and Social management System) for Tinfos projects and power production		○	
Conduct risk assessment of material environmental topics from materiality assessment.			○

Acchieved 2025: ○

Table 14 - Improvement targets, Environment

All observed environmental non-conformances are registered, classified and processed as ESG non-conformances in our non-conformance system. In 2025, 69 non-conformances related to environment were reported, processed and closed according to our non-conformance management procedures.

5.10 Anti-corruption

Tinfos follows a zero-tolerance policy with regard to all forms of corruption and takes active measures to ensure that corruption is not a part of any of our business activities. Our policy on corruption is committed in our Code of Conduct, available on our webpages.

The Corruption Perceptions Index (CPI), published annually by Transparency International since 1995, ranks 182 countries and territories based on perceived levels of public sector corruption. Scores range from 0 (highly corrupt) to 100 (very clean), derived from expert assessments and business surveys.

Our main market up till now have been hydropower plant construction and renewable energy production in Norway which maintained a strong position with a CPI score of 81 in 2025, ranking 4th globally . However, this represents a decline from a score of 88 in 2015, marking the lowest point since 2012 .
The downward trend is attributed to factors such as vulnerabilities in public procurement processes, instances of political corruption, and the absence of a comprehensive national anti-corruption strategy.

UN GLOBAL COMPACT

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Indonesia's CPI score decreased from 37 in 2024 to 34 in 2025, moving its global ranking to 109th out of 182 countries. The probability of running into situations where corruption is attempted in the Indonesian market is regarded as high by Tinfos.

Anti-corruption is a prioritized topic for Tinfos, and we look to the *Transparency International – Business principles for Countering Bribery small and medium enterprise (SME) edition* as guidance in our work to futher developing our anti-corruption management system that will provides us with tools that brings Tinfos' policy of zero tolerance for corruption and bribery into practice.

IMPROVEMENT TARGETS Baseline year: 2021

Anti-corruption

	Not started	Ongoing	Achieved
Tinfos management team staff training. Internal introduction program to Anti-corruption.			○
Staff training, all employees. Internal introduction Code of Conduct inluding Anti-corruption.			○
Establish anti-corruption policy for Tinfos			○
Disclose anti-corruption policy to stakeholders and the general public on webpages (CoC)			○
Establish clear grievance mechanisms, both on web and as internal procedures			○
Establish invoice control and approval routines that involves more than one employee.			○
Study best practice and collect information to learn more about anti-corruption work.			○
Establish clear sanctions if procedures regarding anti-corruption has not been followed		○	
Conduct specific training program for staff with field assignments to high risk areas		○	
Establish routines remining employees of Tinfos anti-corruption policy		○	
Consider regular signing of a-corruption declaration of conformity for staff in high-risk areas		○	
Establish anti-corruption requirements in contracts with partners, suppliers and agents			○

Acchieved 2025: ○

Table 15 - Improvement targets, Anti-corruption

All corruption attempts and other corruption related situations are registered, classified and processed as ESG non-conformances in our non-conformance system.
In 2025, 0 non-conformance related to corruption-risk were reported, processed and closed according to our non-conformance management procedures.

5.11 CULTURAL HERITAGE

Our power plants and our head office in Notodden are centrally located by the Tinelva river in Notodden, in Tinfos' industrial cultural area. Three generations of hydropower plants that offer a cultural-historical perspective on industrial beginnings that were based on hydropower are located here. The area offers a perspective on social development in Norway, in the late 1800s and early 1900s. Ever since Tinfos was established in 1894, we have stayed in the area – and left our mark on it. Now, modern business and lifestyle are combined with culture and tradition.

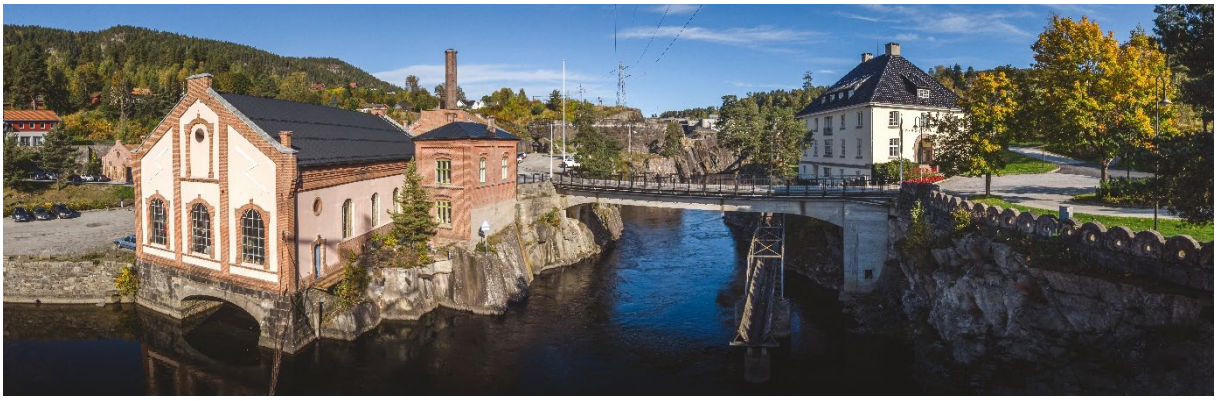


Photo: GodtSagt/Tinfos, Tinfos industrial cultural area

5.11.1 Tinfos industrial cultural area

In 2014 the Tinfos area was established as a formally protected industrial cultural area.

The main purpose of the conservation of the area is to safeguard and preserve a distinctive and well-preserved industrial and urban environment with surroundings, which are representative of industrial development and social development at the end of the 1800s and beyond.

The preservation ensures that the overall historic industrial context of the area is protected and preserves technical facilities as well as the cultural-historical values of the exterior of the buildings.

The purpose of the preservation of the interior of the Tinfos II power station with water gate structures is to ensure the protection of a power station that has been almost unchanged since its construction in 1912 with turbines, technical installations, architectural details, and fixtures.

/Reference: Nw.: *Forskrift om fredning av Tinfos kulturmiljø, Notodden Kommune, Telemark, 20 June 2014/*

UNESCO's Rjukan-Notodden World Heritage Site

The Tinfos area is an important part of UNESCO's Rjukan – Notodden World Heritage Site. Particularly so as the old power stations Tinfos I and Tinfos II including the Holta canal received the status as two significant objects along with 95 others within the Rjukan-Notodden World heritage in 2015. The Tinfos II power station is still producing electricity after over 100 years in operation and is owned and operated by Tinfos AS.

Operating and maintaining power plants in protected areas requires balancing cultural heritage, public access, and safety. Tinfos works closely with regulatory authorities and the local community when planning measures that may affect cultural heritage. Dam Tinfos II has been rehabilitated in accordance with the Cultural Heritage Act, and the same applies to Tinfos II powerhouse, unit no. 4.

5.11.2 Cultural Heritage Management in Indonesian Infrastructure Projects

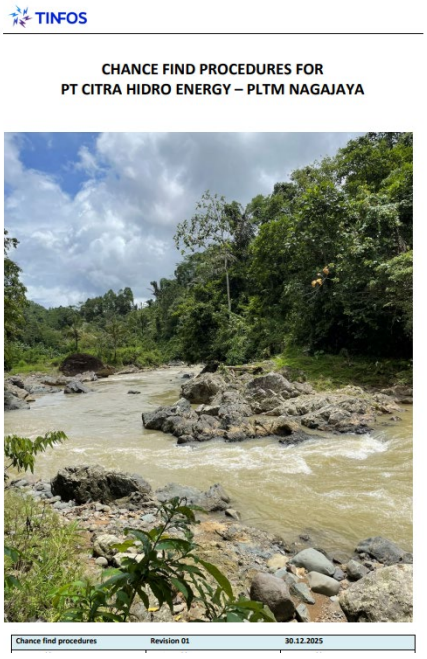
Tinfos is committed to safeguarding cultural heritage in all its international operations, with particular attention to small hydropower developments in forested regions of Indonesia. In accordance with IFC Performance Standard 8 and Indonesian Law No. 11/2010 on Cultural Heritage, are working on processes to develop Cultural Heritage Management Plans (CHMP) tailored to the local context for each project. This plan includes comprehensive cultural mapping, risk assessments, and community-based surveys to identify both tangible and intangible heritage assets e.g. sacred sites, oral traditions, and ancestral graves. Project designs are adapted to avoid known heritage locations, and buffer zones are established where necessary. In the event of chance findings during construction, a formal stop-work protocol will be activated, and local cultural authorities are immediately notified. All suppliers and entrepreneurs working on site receives orientation on any cultural sensitivity that may be related to the project activities, and how to protect the cultural heritage. Tinfos has also established project specific Chance Find Procedures that clearly outlines the process if cultural heritage items are discovered during the construction work by our contractors.

IMPROVEMENT TARGETS Baseline year: 2021

Cultural Heritage	Not started	Ongoing	Achieved
Involve the conservation authorities in Vestfold and Telemark in the reassessment prosess Tinfos 1			O
Involve the conservation authorities in Vestfold and Telemark in the reassessment prosess Tinfos 2			O
Establish Cultural Heritage Management Plans for Indonesian projects where applicable, including plan template			O
Make a formal contractual stop-work protocol that will be activated in the event of chance findings (ID)			O
Establish procedure for orientation with suppliers and entrepreneurs related to cultural heritage sensitivity (ID)			O

Acchieved 2025: O

Table 16 - Improvement targets Cultural Heritage



Tinfos chance find procedures established for the PLTM Nagajaya project in Indonesia

6 TINFOS AND THE EU TAXONOMY

The EU Taxonomy is a green classification system that translates the EU's climate and environmental objectives into criteria for specific economic activities for investment purposes.
It recognizes as green, or 'environmentally sustainable', economic activities that make a substantial contribution to at least one of the EU's climate and environmental objectives, while at the same time not significantly harming any of these objectives and meeting minimum social safeguards.
/European commission, FAQ: What is the EU Taxonomy and how will it work in practice? /

Sustainability criteria for construction and operation of hydropower facilities are defined by the EU taxonomy. The activities are associated with NACE codes D35.11 and F42.22 in accordance with the statistical classification of economic activities established by Regulation (EC) No 1893/2006.

Renewable energy production in general, including hydropower, has been targeted as an economic activity that *may* provide a substantial contribution to the EU environmental objectives, provided that it meets defined screening criteria outlined by the EU Taxonomy.

The Taxonomy Regulation lays out six EU environmental objectives:

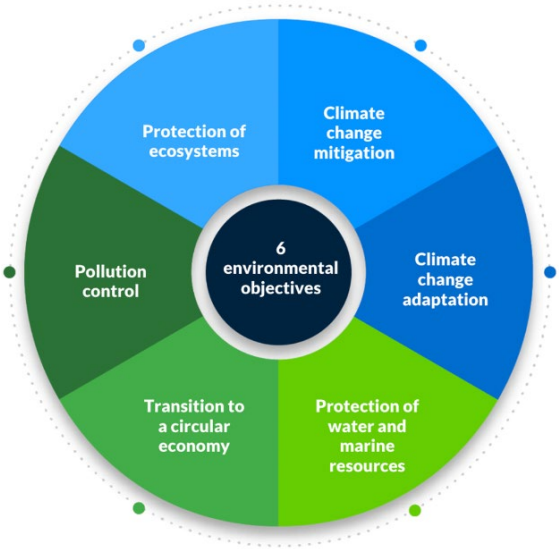


Figure 21 - EU taxonomi environmental objectives, source workiva.com

it also sets out four conditions that an economic activity must meet to be recognized as Taxonomy aligned:

- making a substantial contribution to at least one environmental objective (above)
- doing no significant harm to any other environmental objective
- complying with minimum social safeguards
- complying with the technical screening criteria

As of January 2024, all six environmental objectives have established technical screening criteria in force. Companies and financial market participants subject to the EU Taxonomy Regulation are required to assess and report their activities' alignment with these criteria accordingly. For small hydropower plants substantial contribution is related to the objectives *Climate change mitigation* and *Climate change adaption.* The EU Taxonomy sets requirements for small hydropower plants related to doing no significant harm to the objectives *Climate change mitigation, Climate change adaption, Protection of water and marine resources and Protection of ecosystems.* Per date no requirements are outlined for the objectives *Transition to a circular economy* or *Pollution control.*

In the following section in the next page, we describe how our small and medium sized renewable hydropower plant projects are Taxonomy aligned by meeting the four conditions listed above. We have used the EU Taxonomy Compass https://ec.europa.eu/sustainable-finance-taxonomy/activities/activity/291/view as a supportive tool when making this assessment.

6.1 Climate change mitigation

6.1.1 Substantial Contribution Criteria

6.1.1.1 Run-of-river hydropower plants

The construction of new small and medium sized hydropower facilities for renewable energy production by Tinfos complies with the EU Taxonomy substantial contribution criteria related to the environmental objective *Climate change mitigation* by being designed and constructed as run-of-river plants and does not have an artificial reservoir.

Run-of-river hydropower plants—characterized by the absence of artificial reservoirs—are recognized as making a substantial contribution to climate change mitigation. Specifically, such plants are exempt from the requirement to conduct a life-cycle greenhouse gas (GHG) emissions assessment, which is otherwise necessary to demonstrate emissions below 100 g CO_2e per kWh. This exemption acknowledges the typically low environmental impact of run-of-river installations.

6.1.1.2 Greenhouse Gas Emissions Threshold

Despite the exemption from the GHG assessment, Tinfos is nevertheless calculating GHG emissions from project activities in all our projects. Projects completed by Tinfos during 2024 demonstrated an emission level below 20 g CO_2e per kWh, well below the EU's Greenhouse Gas Emissions Threshold of 100 g CO_2e per kWh. In these calculations, the lifetime of the hydropower plants was assumed to be 50 years.

6.1.2 Do No Significant Harm Criteria

6.1.2.1 Climate change adaption

Tinfos has made a climate risk and vulnerability assessment identifying physical climate risks material to our activities, and measures have been implemented to address the risks. An overview of results is presented in this report.

6.1.2.2 Water

Tinfos complies with the provisions of Directive 2000/60/EC (Nw.: Vanndirektivet) which entered into force in Norway in 2008. The directive is considered for all concessions in Norway given to new hydropower plant construction, which establish criteria for Environmental Impact Assessments.

For hydropower construction projects outside Norway and the EU, Tinfos conducts Environmental Impact Assessments (EIA) to assess all its potential impacts on the status of water bodies within the same river basin and on protected habitats and species directly dependent on water, considering in particular migration corridors, free-flowing rivers or ecosystems close to undisturbed conditions. It assesses in particular the cumulated impacts of this new project with other existing or planned infrastructure in the river basin

The assessments are based on comprehensive and accurate data collected and investigated by professional third-party environmental consultants. The assessment is based on recent, comprehensive and accurate data, including monitoring data on biological quality elements that are specifically sensitive to hydromorphological alterations, and on the expected status of the water body as a result of the new activities, as compared to its current one.

All technically feasible and ecologically relevant mitigation measures are implemented to reduce adverse impacts on water as well as on protected habitats and species directly dependent on water.

Mitigation measures include, where relevant and depending on the ecosystems naturally present in the affected water bodies:

a) measures to ensure downstream and upstream fish migration (such as fish friendly turbines, fish guidance structures, state-of-the-art fully functional fish passes, measures to stop or minimize operation and discharges during migration or spawning);
b) measures to ensure minimum ecological flow (including mitigation of rapid, short-term variations in flow or hydro-peaking operations) and sediment flow;
c) measures to protect or enhance habitats.

Tinfos establish Environmental Action Plans (EAP) to ensure that mitigating measures are enforced in our projects to prevent or reduce the environmental impact of the hydropower facility construction and operation.

6.1.2.3 Circular economy

Not Applicable for construction and operation of hydropower facilities according to the EU Taxonomy.

6.1.2.4 Pollution prevention and control

Not Applicable for construction and operation of hydropower facilities according to the EU Taxonomy. However, in our projects we prevent significant pollution by establishing a range of requirements in our projects e.g. to maintain Chemical Substance Inventory Register, ensuring proper storage areas for fuels and other hazardous materials, making sure that appropriate absorbent materials and spill kits are available, establishing site waste management plans, ensure that licensed contractors are engaged to collect, transport and dispose of all waste oil and other hazardous waste generated at the project site.

In addition, we are establishing a range of requirements in our projects to prevent pollution from sedimentation e.g. ensuring that sedimentation controls are implemented in our projects and ensure that isolation techniques are used to limit the exposure of disturbed sediments to moving water during in-stream works.

6.1.2.5 Biodiversity and ecosystems

Tinfos complies with the provisions of the Environmental Impact Assessment (EIA) Directive which is considered in the Norwegian regulation *Forskrift om konsekvensutredninger*. The directive is considered for all concessions in Norway given to new hydropower plant construction and establish criteria for Environmental Impact Assessments.

For hydropower construction projects outside Norway and the EU, Tinfos conducts Environmental and Social Impact Assessments (ESIA) to assess all potential impacts on environment and local community from the construction and operation of the hydropower facility and to implement mitigating measures to prevent or minimize any adverse impact on biodiversity and ecosystems.

For sites/operations located in or near biodiversity-sensitive areas we always conduct appropriate ESIA-assessments and implement necessary mitigation measures based on its conclusions.

6.1.2.5.1 Biodiversity Assessments.

Tinfos integrates biodiversity considerations into its broader environmental and social risk management framework, particularly in international projects. The company follows the IFC Performance Standards on Environmental and Social Sustainability, which require early identification of potential biodiversity impacts and the implementation of mitigation measures. Environmental and Social Impact Assessments (ESIA) are conducted in line with local regulations (e.g., UKL/UPL in Indonesia) and international standards.

6.1.2.5.2 Habitat conservation

Tinfos project developers conduct early-stage environmental impact assessments (EIA) to identify suitable locations for hydropower plants that minimize harm to local ecosystems. This includes avoiding sites with high ecological sensitivity, prioritizing areas with existing infrastructure to reduce new habitat fragmentation and ensuring that selected sites do not overlap with protected or conservation-priority zones.

Final landscaping is a critical phase in all our projects. Our goal is to ensure that disturbed land areas are meticulously restored to blend seamlessly with the natural landscape. A key part of this involves using soil masses that originated from the immediate vicinity.

This practice is crucial for minimizing the risk of introducing alien (non-native) species into the affected ecosystems. By returning the native soil, we help maintain the existing ecological balance and prevent the proliferation of invasive plants or microorganisms that could outcompete local flora and fauna, disrupt natural habitats, or alter the area's biodiversity

6.2 Climate change adaption

6.2.1 Substantial Contribution Criteria

6.2.1.1 Climate Risk Assessment

In our projects we make comprehensive assessments of physical climate risks (e.g., floods, droughts) and incorporate adaptation solutions in our designs accordingly to enhance plant resilience both during construction and operational phase, and to substantially reduce the most important risks that are material to the construction and operation of our hydropower plants both on short and long term.

6.2.2 Do No Significant Harm Criteria

6.2.2.1 Climate mitigation

The direct GHG emissions of the activity are lower than 270 g CO_2e /kWh. Projects completed by Tinfos during 2024 demonstrated an emission level below 20 g CO_2e per kWh, assuming a lifespan for the hydropower plants of 50 years.

6.2.2.2 Water

Ref. section 6.1.2.2 above.

6.2.2.3 Circular economy

Ref. section 6.1.2.3 above.

6.2.2.4 Pollution prevention

Ref. section 6.1.2.4 above.

6.2.2.5 Biodiversity

Ref. section 6.1.2.5 above.

6.3 Complying with minimum social safeguards

In our policies Tinfos states that we ensure alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declarationg of the International labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

Picture of the small run of river hydropower plant Frøytlandsfoss

7 TINFOS AND SUSTAINABILITYREPORTING

The Corporate Sustainability Reporting Directive – CSRD – was introduced in Norway from 1 November 2024, replacing the old Non-Financial Reporting Directive (NFRD).

Tinfos is not required to report on sustainability according to the CSRD today. Nevertheless, CFRD will have an impact on Tinfos, first and foremost, because of our stakeholders' expectations.
The EU introduced the Corporate Sustainability Reporting Directive (CSRD) to require companies to disclose standardized information about environmental, social, and governance (ESG) matters. However, many businesses and industry groups argued that the rules were too complex and burdensome, especially for smaller and medium-sized companies. In response, the European Commission proposed the "Omnibus" simplification package to reduce administrative burden while keeping sustainability reporting requirements for the largest companies..

For SMEs no longer under mandatory reporting, a voluntary sustainability reporting standard based on EFRAG's VSME framework will be introduced. This allows SMEs to continue sustainability disclosures in a simplified manner, which can be advantageous for investor relations and supply chain transparency.

Even so, Tinfos will be disclosing to our stakeholders that we have Taxonomy-aligned activities, ensuring that our stakeholders can make decisions involving Tinfos accordingly.

We recognize that several of our partners such as banks, investors and financial institutions are, or soon will be, required to report according to
EU standards for sustainable finance. This means that our key stakeholders will request sustainability data from Tinfos at an increasing rate.

With the EU narrowing the scope of CSRD, many medium-sized companies that were previously expected to prepare for CSRD may now instead choose the VSME framework as a proportionate alternative. The European Commission has also signaled support for using VSME as the main sustainability reporting framework for SMEs outside the mandatory CSRD scope. Tinfos will assess whether the VSME framework is a suitable ESG reporting standard for us in the future.

1 July 2022 the Transparency Act (Nw.: Åpenhetsloven) came into effect in Norway. The Transparency Act shall promote enterprises' respect for fundamental human rights and decent working conditions and ensure that the general public has access to information about how enterprises address adverse impacts on human rights and working conditions. The intentions of the act correlate with those of the UN Global Compact and urges larger enterprises to carry out due diligence processes on responsible business conduct, particularly related to human rights and labor conditions. Tinfos conducted our first due diligence process required by the Transparency Act in 2023, and we have published our summary report from this process annually since then on our web pages.

Tinfos publishes its sustainability report (this report) on its website to ensure transparency and accessibility for all stakeholders. By making the report publicly available, the company demonstrates its commitment to responsible business practices and accountability in areas such as environmental impact, social responsibility, and corporate governance. This open communication supports compliance with regulations like the Norwegian Transparency Act and aligns with international frameworks such as the UN Sustainable Development Goals and the UN Global Compact.

Our aim is that our sustainability reporting continues to foster trust and engagement with customers, partners, authorities, and the broader community.

8 PREPARING FOR THE FUTURE

The next pages of this report show an overview of the overall results from our climate-risk assessment listing climate risks and opportunities that are expected to have the greatest impact on our operations in a short- and long-term perspective. The risks and opportunities are not listed in any particular order.

8.1 How we work with climate-related risks and opportunities

The climate risk assessment has been made by representatives from all business areas in Tinfos, interchanging information and views on the topics from different perspectives in the company.

By discussing how each topic is relevant for Tinfos and categorizing relevance and impact on a scale from 1-10 for short- and long-term perspectives we end up with a prioritized overview of potential risks and opportunities.

The strategic importance of the risk depends on the potential scope of its impact in relation to our level of knowledge about the topic. Therefore, we have made a categorization for each topic based on our self-perceived knowledge level in our organization on each specific topic on a scale from 1 to 10. This provides us with a useful mapping of where to increase the organization's knowledge levels to be prepared to handle relevant risks and opportunities when and where they occur.

8.2 Climate-related risks

Climate risk			Short term perspective (0-1 years)			Long term perspective (2 years and more)		
			Impact	Knowledge	Priority	Impact	Knowledge	Priority
Transition (Climate policies and regulations, market changes, new technologies, Value chain distruptions etc.)	Policy and legal	*Increased pricing of GHG emissions*	8	10	Medium	8	10	High
		Enhanced emissions-reporting obligations	3	5	Medium	5	5	High
		Mandates on and regulation of existing products and services	8	10	Medium	8	10	High
	Technology	*Substitution of existing products and services with lower emissions options*	5	2	Low	5	2	Low
		Costs to transition to lower emissions technology	5	8	Medium	5	8	Medium
	Market	*Changing customer behavior*	3	10	Low	3	10	Medium
		Uncertainty in market signals	3	10	Low	5	10	Low
		Increased cost of raw materials	5	10	High	5	10	High
	Reputation	*Shifts in consumer preferences*	8	7	Medium	8	7	Medium
		Stigmatization of sector	8	10	Medium	7	10	Low
		Increased stakeholder concern or negative stakeholder feedback	3	10	Low	7	10	Low
Physical (Temperature increase, rising sea levels, storms extreme precipitation, landslides, floods etc.)	Acute	*Increased severity of extreme weather events such as cyclones and floods*	7	10	Medium	5	10	High
	Chronic	*Changes in precipitation patterns and extreme variability in weather patterns*	5	10	Medium	5	10	High
		Rising mean temperatures	NA	NA	#I/T	NA	NA	#I/T
		Rising sea levels	NA	NA	#I/T	See above	NA	#I/T

Table 17 - Climate risk assessment

8.3 Climate-related opportunities

Climate opportunity		Short term perspective (0-1 years)			Long term perspective (2 years and more)		
		Impact	Knowledge	Priority	Impact	Knowledge	Priority
Resource efficiency	*Increased pricing of GHG emissions*	10	10	High	10	10	High
	Use of more efficient modes of transport	4	2	Low	4	2	Medium
	Use of more efficient production and distribution processes	3	2	Medium	3	2	Medium
	Use of recycling	1	2	Low	1	2	Low
	Move to more efficient buildings	1	8	Low	1	8	Low
	Reduced water usage and consumption	1	10	Low	1	10	Low
Energy source	*Use of lower-emission sources of energy*	1	10	Low	1	10	Low
	Use of supportive policy incentives	10	8	High	10	8	High
	Use of new technologies	2	5	Low	8	5	High
	Participation in carbon market	1	4	Low	1	4	Low
	Shift toward decentralized energy generation	10	10	High	10	10	High
Products and services	*Development and/or expansion of low emission goods and services*	4	2	Medium	4	2	Medium
	Development of climate adaptation and insurance risk solutions	1	5	Low	1	5	Low
	Development of new products or services through R&D and innovation	4	8	Medium	4	8	High
	Ability to diversify business activities	8	6	High	8	6	High
	Shift in consumer preferences	10	10	High	10	10	High
Markets	*Access to new markets*	10	7	High	10	7	High
	Use of public-sector incentives	10	10	High	10	10	High
	Access to new assets and locations needing insurance coverage	5	7	Medium	5	7	Medium
Recillience	*Participation in renewable energy programs and adoption of energy-efficiency measures*	2	10	Low	2	10	Low
	Resource substitutes/ diversification	1	10	Low	1	10	Low

Table 18 - Climate opportunity assessment

9 TINFOS AND THE UN SUSTAINABILITY DEVELOPMENT GOALS

9.1 Materiality assessment

As part of our sustainability efforts, Tinfos has co-operated with an independent party to conduct a materiality assessment to identify where we should prioritize our efforts and establish a framework for sustainability reporting.

The materiality assessment of Tinfos has been based on the methodology, principles, and guidelines from Global Reporting Initiative (GRI). The list of topics has been adjusted by the consulting firm to be relevant for Tinfos, using the International Hydropower Association's (IHA) Hydropower Sustainability Guidelines, as well as input from stakeholders, best practice in the industry and the consultant's experience.

As part of this work, stakeholders of the activities of the company have been mapped and key stakeholders have been involved through interviews and a survey.

The materiality assessment has been revised during the last year and now identify 14 topics as the prioritized material topics for Tinfos. These are:

Economic	Environment	Social
Economic Performance	**Biodiversity and Ecosystem integrity**	**Employment**
Good Governance	**Renewable Energy**	**Labour Rights**
Anti-Corruption Management	**Water Resource Management**	**Occupational Health and Safety**
	Climate Change Resilience	**Local Community Health and Safety**
		Local Community Livelihood Impacts
		Stakeholder dialogue and consultation
		Land Acquisition

Figure 22- Material sustainability topics for Tinfos

The Tinfos Materiality Matrix shown below summarize all Topics identified and investigated, and how they are assessed by our stakeholders with regards to importance/influence and significance of impact to the UN sustainability development goals (SDGs).

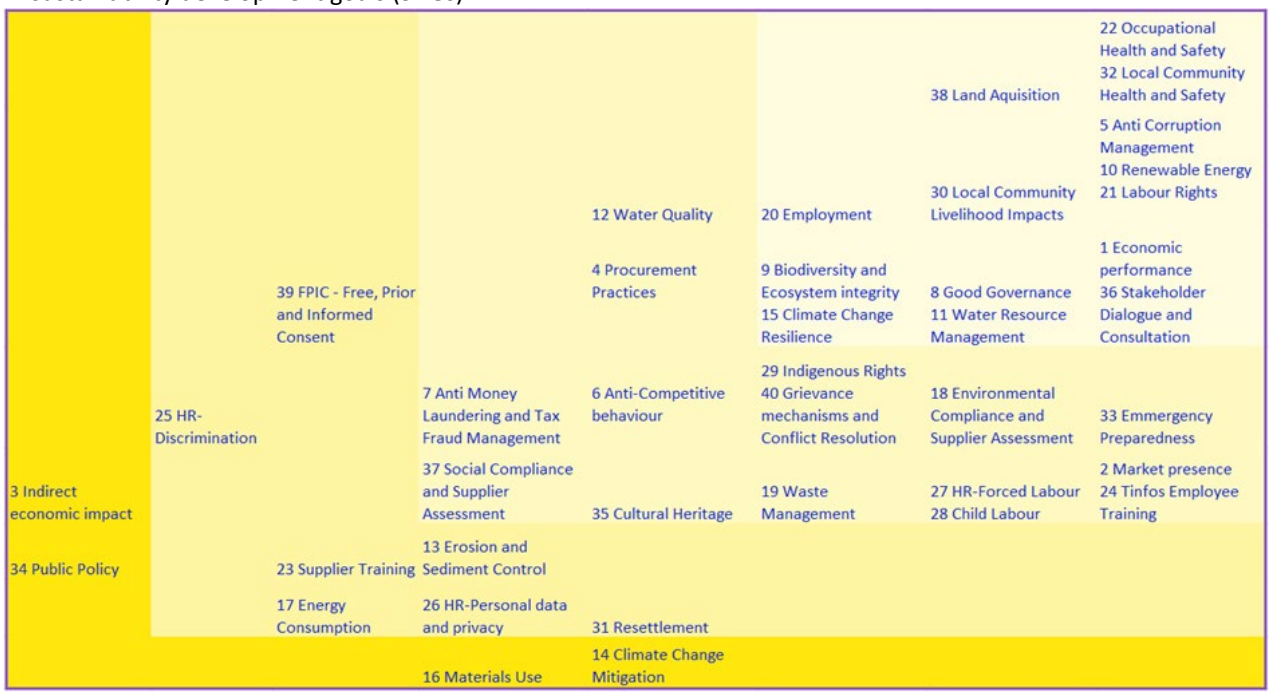


Figure 23 - Tinfos Materiality Matrix

TINFOS	3 GOOD HEALTH AND WELL-BEING	5 GENDER EQUALITY	6 CLEAN WATER AND SANITATION	7 AFFORDABLE AND CLEAN ENERGY	8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION	15 LIFE ON LAND	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	17 PARTNERSHIPS FOR THE GOALS
Economic Performance		●		●	●	●					●
Good Governance		●			●					●	
Anti-Corruption Management					●					●	
Biodiversity and Ecosystem integrity									●		
Renewable Energy	●			●	●	●	●	●			
Water Resource Management			●								
Climate Change Resilience				●		●		●			
Employment	○	○			○						
Labour Rights		○			○					○	
Occupational Health and Safety	○				○						
Local Community Health and Safety	○		○		○	○					
Local Community Livelihood Impacts					○						
Stakeholder dialgue and consultation		○			○					○	
Land Aquisition		○								○	

Figure 24 -Tinfos Materiality vs. SDGs

9.2 ESG objectives

Based on the 11 material topics and their relation to the United Nations Sustainable Development Goals (SDGs), Tinfos has established ESG objectives for each of the SDGs that relates to the topics identified in the materiality assessment.

- At Tinfos we will take measures to avoid harmful pollution of air, water and soil.
- At Tinfos we will take measures to minimize disturbing noise from our construction activities.
- At Tinfos we will take measures to prevent abuse of drugs and harmful use of alcohol.
- At Tinfos we will take measures to prevent spread of infectious and transmitted diseases.
- At Tinfos we support public health initiatives for employees and the community.
- At Tinfos, people of all genders have the same opportunity to get a job, to develop their experience and knowledge and to occupy leading positions in the company.
- At Tinfos salary determination is made with no consideration to gender.
- At Tinfos we strive to obtain a balanced proportion of men and women in our organization, at all levels and in all functions
- At Tinfos, we shall take appropriate measures to identify risks and prevent pollution during construction and operation of hydropower plants.
- At Tinfos, we shall ensure that any project impact on water resources used by local community and stakeholders are identified and managed appropriately.
- At Tinfos we undertake monitoring to ensure compliance with downstream seasonal variation flow regimes.
- At Tinfos, we will be cost effective in our preparation, implementation and operation of hydropower plants, ensuring affordable, clean and renewable energy for the community through our focused project conduct, operational experience and asset management excellence.
- It shall be safe to work at Tinfos, and the company shall conduct our business and activities in a way that prevents damage to persons, equipment and environment.
- At Tinfos, we shall seek common ground through regular dialogue and cooperation between employees and management in matters related to occupational health and work environment.
- At Tinfos we shall respect employees´ right to form and join trade unions.
- At Tinfos, we will provide reliable hydropower plants that contribute to a safe, sustainable and renewable energy supply.
- At Tinfos, we will actively ensure the training and competence enhancement of local supervisory personnel and operators.

- At Tinfos, we shall take appropriate measures to identify risks and ensure transparent and sustainable handling procedures for substances and all kinds of waste during construction and operation of hydropower plants.
- At Tinfos we shall encourage our suppliers to take actions to prevent, reduce, recycle and reuse waste.
- At Tinfos we will take measures to ensure sustainable procurement for material and services.

- Tinfos will increase the share of hydropower in the markets we operate as a renewable alternative to other less sustainable energy sources.
- Tinfos shall monitor and minimize energy consumption and greenhouse gas emissions in our project activities and business operations.
- Tinfos shall assess our hydropower plant resilience to climate change and apply these conditions in our design basis to ensure infrastructural safety and energy availability.
- At Tinfos, we shall identify, mitigate or minimize risks to biodiversity and life on land generated by our activities when implementing and operating hydropower plants.
- At Tinfos, we shall always take measures to minimize the project impact area, and to take actions to encourage nature restauration before leaving the construction site.

- Tinfos has zero tolerance towards all forms of corruption and shall take active measures to ensure that this does not happen in our business or activities.
- At Tinfos, we shall act in an open and transparent manner, and we shall exercise integrity in all situations.

- Tinfos shall, with the purpose of sharing knowledge and experience with others, and to empower our own ability to perform in accordance with high ESG standards, seek cooperation and participation in selected initiatives and networks that promote sustainable conduct and ESG topics relevant to our business.

Photo: Kjell Magne Haugen, Project Smådalselva

9.3 Partnerships for the goals

In 2025, the following partnerships and networks were particularly important to us:

9.3.1 UN Global Compact

Through our membership in the UN Global Compact, Tinfos is committed to submitting annual reports to demonstrate how our work with these important topics is progressing. Our membership in the UNGC inspired us to publish our first sustainability report back in 2021.

UN Global Compact are the world's largest corporate sustainability initiative. UN Global Compact is a call to companies to align strategies and operations with universal principles on human rights, labor, environment and anti-corruption, and take actions that advance societal goals. Read more about this on the UN Global Compact's webpages,

9.3.2 Norad

Norad is the Norwegian agency for development cooperation and work for the world to achieve the UN's sustainability goals. Norad strives for a greener future and contributes to global development. Read more about Norad on their webpage.

Since 2018 Tinfos has worked with Norad related to project development for sustainable hydropower implementation in Indonesia. In 2023, Tinfos partnered with Norad to financially support hydropower feasibility studies and infrastructure. The support period runs to 31 October 2026. The project's expected effect on society is increased job generation, increased exports, increased access to reliable, sustainable and modern energy to an affordable price and/or reduced greenhouse gas emission in Indonesia.

9.3.3 Norfund

Norfund is the Norwegian Investment Fund for developing countries. Norfund invests in developing countries to create jobs, improve lives, and support the transition to net zero. Read more about Norfund on their web page.

Tinfos develops and invests in hydropower projects in Indonesia in partnership with Norfund through Tinfund Pte. Ltd., a Singapore-based investment platform established to support the development and construction of hydropower assets.
In 2021, Tinfos secured a loan agreement with Norfund to support the development of a specific hydropower project in Indonesia.
The Tinfund agreement mandates that Tinfos adheres not only to applicable Indonesian laws and regulations, but also to the IFC Performance Standards and Environmental, Health and Safety (EHS) Guidelines.

These requirements form the foundation of Tinfos' strategic commitment to developing and operating sustainable hydroelectric power plants that deliver strong financial performance, contribute to environmental resilience, and create long-term value for the communities and markets we serve.

9.3.4 Pentagreen

Pentagreen has committed a multi-tranche financing facility of up to USD 45 million to support Tinfund, a joint venture between Tinfos and Norfund, to accelerate the development and financing of small run-of-river hydropower projects in Indonesia, with initial funding allocated to the Nagajaya project.

The partnership reflects a shared ambition to scale renewable energy solutions in emerging markets by leveraging blended finance structures that help mobilise capital for projects that may otherwise face financing barriers due to their size and distributed nature.

Through this collaboration, Tinfos contributes to delivering stable and reliable renewable energy to the Indonesian grid, supporting rural electrification, industrial development and reduced greenhouse gas emissions.

The projects financed under this framework are aligned with international best practice, including IFC Environmental and Social Standards, underscoring a joint commitment to responsible development and sustainable value creation.
Overall, the partnership with Pentagreen strengthens Tinfos' ability to scale its hydropower portfolio while contributing to broader climate and development objectives in the region.

10 WHAT'S NEXT?

Sustainability is a complex matter. It is a challenge to contribute with a positive impact in one place, such as building new powerplants producing renewable energy, without creating some level of harm in another.

The world is in dire need of more renewable energy as a replacement for non-renewable and less sustainable energy sources. Renewable hydropower provides significant environmental and climate benefits. Our mission is to design, build, finance, operate and maintain high quality renewable energy powerplants that create financial, social and environmental values in selected markets.

At Tinfos we aim to constantly improve and keep ourselves updated on sustainability issues with relevance to our area of business. We concentrate our efforts to avoid, mitigate, reduce or compensate for any negative impact our activities may have on the environment or community as we continue to build sustainable hydropower plants for renewable energy production.

We believe that hydropower implementation shall be and must be sustainable. At Tinfos we use the Hydropower Sustainability tools issued by International Hydropower Association as supporting tools and sources of knowledge (the HS Assessment Protocol, the HS Guidelines and the HS ESG Gap Analysis Tool) when assessing sustainability internally in Tinfos for our small and medium sized hydropower projects.

In 2021 Tinfos established a strategic vision and tactical mission reflecting both ESG and sustainability. We have established policies and objectives for ESG and sustainability, and we have implemented and continue to develop new processes and procedures to monitor material input, energy-consumption, waste production and GHG emissions from our activities. From 2022 and onward the processes has been, and are being, formalized into our governing documents and quality procedures as we continue to develop our sustainability tools.

In 2024 Tinfos started on a systematic approach to establish an Environmental and Social Management System according to the IFC Performance Standards. This effort continues into 2025.

Improving sustainability reporting

As we gain more experience with time and learn from the process, we will continue to develop new tools and raise our ambitions to improve our communication on sustainability with our stakeholders and the public in general.

Tinfos will assess whether the VSME framework is a suitable ESG reporting standard for us in the future.

We welcome any feedback, input or ideas that you may have.

Email: post@tinfos.no

This report is adapted to the Global Reporting Initiative (GRI), the Non-Financial Reporting Directive (NFRD), and the Task Force on Climate-Related Disclosures (TCFD). This does not mean that the report is aligned with these frameworks.
Read more at www.nsrs.eu.

11 REFERENCE DOCUMENTATION

11.1 List of figures

11.2 List of tables

11.3 Governing documents publicly available on www.tinfos.no

- Corporate Governance Policy
- Quality Policy
- Sustainability Policy
- HSE Policy
- Privacy and Data Protection Policy
- ESG Declaration of conformity – supply chain
- Tinfos Code of Conduct
- Tinfos ESG objectives.

11.4 Tinfos reports publicly available on www.tinfos.no

- Annal Report 2025/ Årsrapport 2025 (Financial)
- Health, safety and environment, Annual Report 2025
- Sustainability Report 2025 (this document)
- Account for Due Dilligence according to the Tranparency Act 2026