

Gigawatt

Sustainability Report 2025



GIGAWATT
FACTORY

LEAG 

Table of contents

- 4 Foreword
- 6 LEAG Gigawatt GmbH as part of LEAG group
- 15 Basis for preparation of the sustainability statement and disclosures in relation to specific circumstances
- 31 Governance of sustainability matters
- 40 Approach to sustainability

67 Environmental

- 68 Climate change
- 88 Pollution
- 93 Water
- 95 Biodiversity and ecosystems
- 103 Resource use and circular economy

110 Social

- 111 Own workforce
- 128 Workers in the value chain
- 132 Affected communities
- 136 Consumers and end users

140 Governance

- 141 Business Conduct

153 ANNEX

- 174 ESRS content index
- 179 Imprint

Reference terminology and reporting scope

This Sustainability Report covers **LEAG Gigawatt GmbH** and its sub-holding structure, which comprises **LEAG Renewables GmbH, LEAG Clean Power GmbH, LEAG Biomass GmbH** and **LE Finance GmbH**. Together, these entities form the **Gigawatt division**, which within the LEAG group is responsible for advancing renewable energy generation, low-emission and storage technologies to support a secure and resilient energy supply. Unless stated otherwise, references to the Gigawatt division refer to these entities as a combined group. Where information relates to an individual entity, either the full legal company name (e.g., LEAG Gigawatt GmbH) or the term “the company” is used, provided the specific entity can be clearly identified from the context.

LEAG or **LEAG group** is used to refer to all LEAG companies under and including the holding structure of **LEAG GmbH**, which provides overarching strategic direction, governance and centralised functions.

Foreword

Dear Reader,

The transformation of the energy system is no longer a matter of choice – it is a responsibility. With this Sustainability Report, prepared on a voluntary basis, we demonstrate how this responsibility is being translated into action.

For the first time, the reporting scope focuses on LEAG Gigawatt GmbH and the companies consolidated under its sub-holding structure (the Gigawatt division), reflecting the LEAG group's strategic realignment and providing greater transparency on our future-oriented business activities.

In 2025, the organisational realignment of the LEAG group was formally completed. The LEAG Gigawatt sub-holding structure was established to accelerate the transformation of our energy portfolio while maintaining supply security. By structuring renewable energy, large-scale battery storage and low-emission activities within independent companies under a common holding framework, we enable faster decision making, a sharper market focus and more precise investments. At the same time, we are addressing volatile markets and electricity prices with a clear commitment to cost leadership, disciplined capital deployment and the pooling of resources and expertise across the division.

Against this backdrop, 2025 saw tangible operational progress in key market segments. In response to continued price pressure in the photovoltaic market, LEAG Renewables GmbH consistently aligned planning and processes towards cost efficiency as part of the group-wide "NextGen.machen" strategy. Development efforts were deliberately concentrated on economically viable projects in both wind and

photovoltaics, with several priority projects advancing across construction and permitting. For the continued expansion of renewables, timely political decisions remain essential, as the current German renewable support framework requires fundamental revision ahead of the expiry of its state aid approval in 2027.

Hydrogen-ready gas-fired power plants are a key enabler of a secure system alongside renewables. However, the collapse of the German governing coalition in November 2024 further delayed the necessary regulatory framework. Nevertheless, LEAG Clean Power GmbH continued to advance project development at strategically important sites, building on existing groundwork and partial permits. In parallel, significant momentum was achieved in large-scale battery storage, with EPC contracts concluded for two projects among the largest currently planned in Germany and Europe. These assets support grid stability, renewables integration and the further development of existing energy and industrial sites.

Looking ahead, the Gigawatt division remains firmly focused on expanding its transition-oriented business model and adding up to 7 GW of newly built capacity across renewables, storage and power plants.



Portfolio flexibility, together with existing sites and infrastructure, provide a strong foundation to compete successfully in an increasingly dynamic market environment. We will prioritise cost-efficient, scalable solutions that enhance supply security and strengthen economic resilience. In biomass, we are consolidating our expanded platform following recent acquisitions while maintaining high standards in sourcing and product-quality. This further increases portfolio resilience and helps provide reliable heating solutions for customers.

To reach our strategic goals, clear and reliable regulation remains essential. This includes non-discriminatory tenders for gas-fired power plants and predictable rules for grid connection, grid charges and market design across renewables and flexibility solutions, with greater clarity expected in 2026. At the same time, we are preparing for an evolving regulatory landscape, as increased EU reporting and due diligence obligations require additional effort. Despite these uncertainties and shifting international perspectives on the European Green Deal, we remain committed to European standards and to contributing to a reliable and increasingly low-emission energy supply.

The transformation of the energy system can only succeed by balancing environmental responsibility, affordability and security of supply, supported by open dialogue and strong partnerships. We will therefore continue our close and constructive exchange with investors, local communities, employees and policymakers.

This Sustainability Report documents not only where we stand today, but also the principles that guide us forward. We are determined to play our part in shaping a secure, competitive and increasingly low-emission energy future.

Sincerely,

Adi Roesch
CEO LEAG GmbH



LEAG Gigawatt GmbH as part of LEAG group

LEAG Gigawatt GmbH is part of the LEAG group – the second-largest electricity producer in Germany.

Since its founding in 2025, LEAG Gigawatt GmbH has consolidated all business activities related to the planning, construction and operation of energy transition technologies under one common division (Gigawatt division). As a sub-holding structure of LEAG GmbH, the Gigawatt division is at the heart of LEAG's GigawattFactory, an integrated concept for a secure and increasingly low-emission energy system. This target state outlines a flexible and future-oriented technology mix based on renewable sources, dispatchable capacity and large-scale storage, ensuring a reliable

24/7 electricity supply for Germany's economy after the coal phase-out in the upcoming decade. *The climate change mitigation approach and related implementation actions are described in chapters E1-1 and E1-5.*

The portfolio of the Gigawatt division includes wind energy and photovoltaics (PV), large-scale battery storage systems, gas-fired power plants, including future hydrogen-ready facilities, and sustainable biomass fuels (wood pellets). Its activities are primarily focused on Eastern Germany, particularly the states of Brandenburg and Saxony. There, the LEAG group is one of the largest private-sector employers and, through contracts with regional, national and international partner companies, a significant economic factor.

As the largest energy supplier in Eastern Germany, the LEAG group is actively involved in the energy transition, aiming to evolve from a mining and power plant operator into a diversified energy company. The Gigawatt division plays a central role in this process, both in the restructuring of the LEAG group and in the structural development of the Lusatian and Central German mining regions into future-oriented locations that combine low-emission energy infrastructure with new industrial activity and long-term value creation.

The Gigawatt division also has a location in Leipheim, Bavaria. Furthermore, the division operates internationally with four solar parks in the Czech Republic, four pellet plants in Sweden and one in Latvia.

Energy map

Sites full of energy

-  gas-fired power plant
-  gas-fired power plant H2-ready
-  battery energy storage
-  wind farm
-  solar park
-  floating photovoltaics
-  biomass
-  projects in advanced planning, permitting or realisation

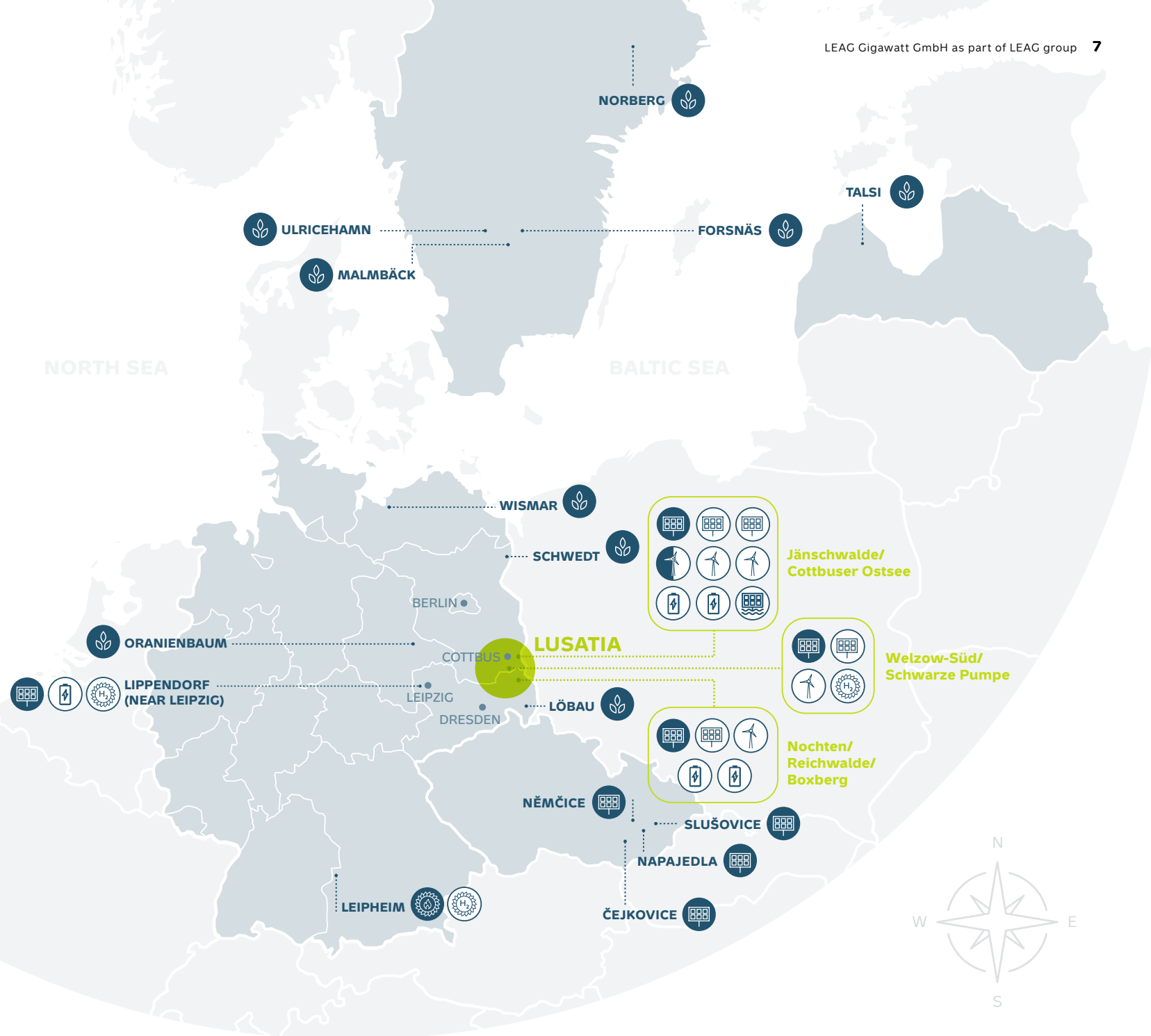
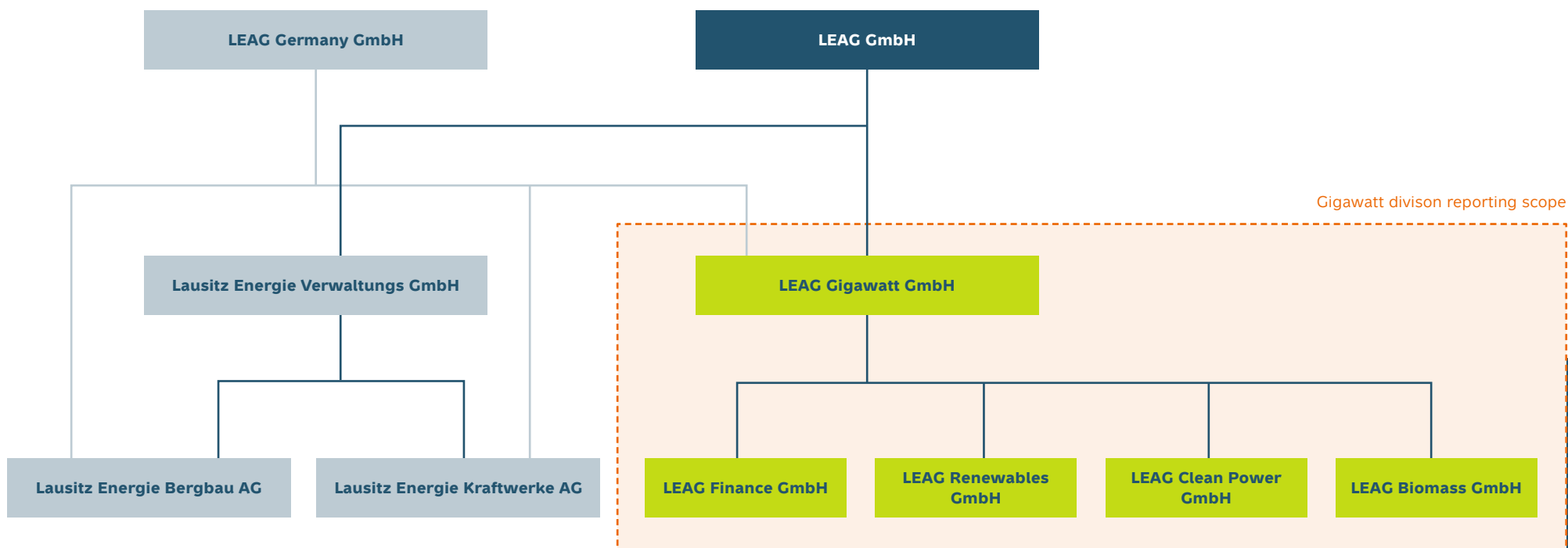


Figure 1: Energy map of Gigawatt division.

Gigawatt reporting scope within the LEAG group



Shareholder structure

Figure 2: Organisational structure of LEAG group and Gigawatt division, including the Gigawatt reporting scope, as of 31 December 2025.

LEAG Gigawatt GmbH is 80% owned by **LEAG GmbH** and 20% by **LEAG Germany GmbH**, which is indirectly wholly owned by **EP Energy Transition, a.s.** It is at the top of a group of companies within the Gigawatt division: **LEAG Renewables GmbH**, **LEAG Clean Power GmbH** and **LEAG Biomass GmbH**, as well as **LE Finance GmbH**, which, among other things, ensures the financing of projects within the Gigawatt division.

LEAG GmbH, headquartered in Cottbus, manages the LEAG group's existing and new business activities. It is wholly owned by **LEAG Holding a.s.**, headquartered in Prague, which is wholly owned by the **EP Group** via **EP Energy Transition, a.s.**

Establishment of LEAG group and expansion into new business areas

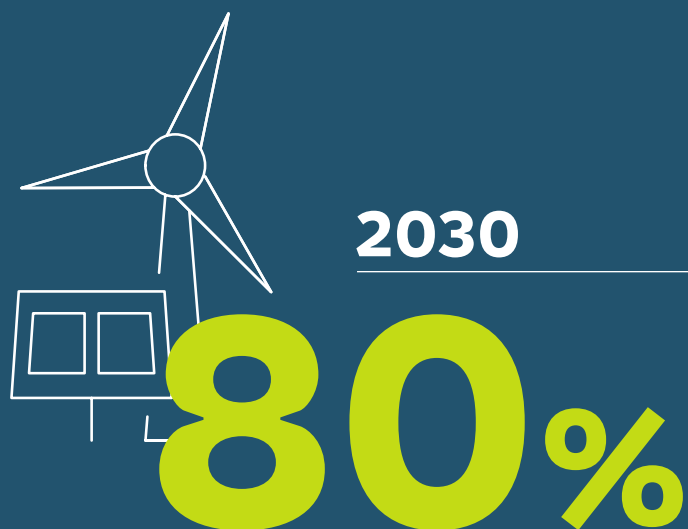
The LEAG group of companies operates at the heart of Germany's energy transition (Energiewende), in support of the country's goal of achieving climate neutrality by 2045.

In 2016, the parent company Lausitz Energie Verwaltungs GmbH and its subsidiaries Lausitz Energie Bergbau AG and Lausitz Energie Kraftwerke AG emerged from Vattenfall's East German mining and lignite power plant division. Following the establishment under the new LEAG brand, a comprehensive transformation process was initiated. The first opencast mine had been closed as planned and conversion into a lake, the Cottbuser Ostsee Lake, started. In 2018, LEAG began developing new business areas that can operate independently of lignite-fired power generation and address external markets with capabilities previously used internal, including electricity marketing, maintenance and other industrial and engineering services. The core of the company's transformation activities remained electricity generation, with the expansion and diversification of the plant portfolio utilising existing land, infrastructure and local skilled workers.

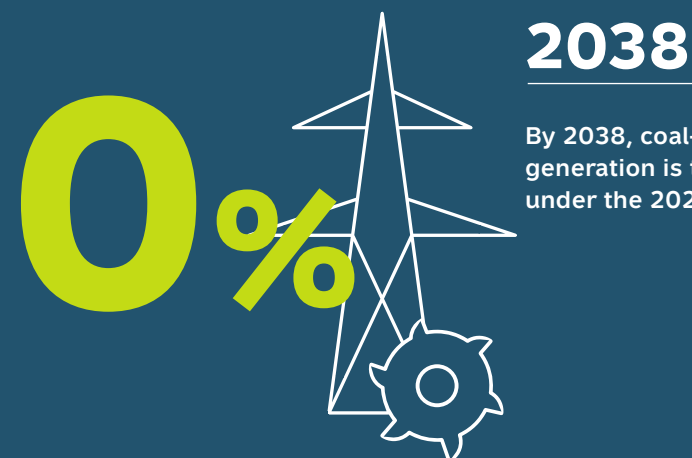
Cottbuser Ostsee



The LEAG group is addressing significant challenges arising from changes in the regulatory environment in Germany.



By 2030, 80% of Germany's gross electricity consumption is to be met by renewable sources, in line with the national climate targets.



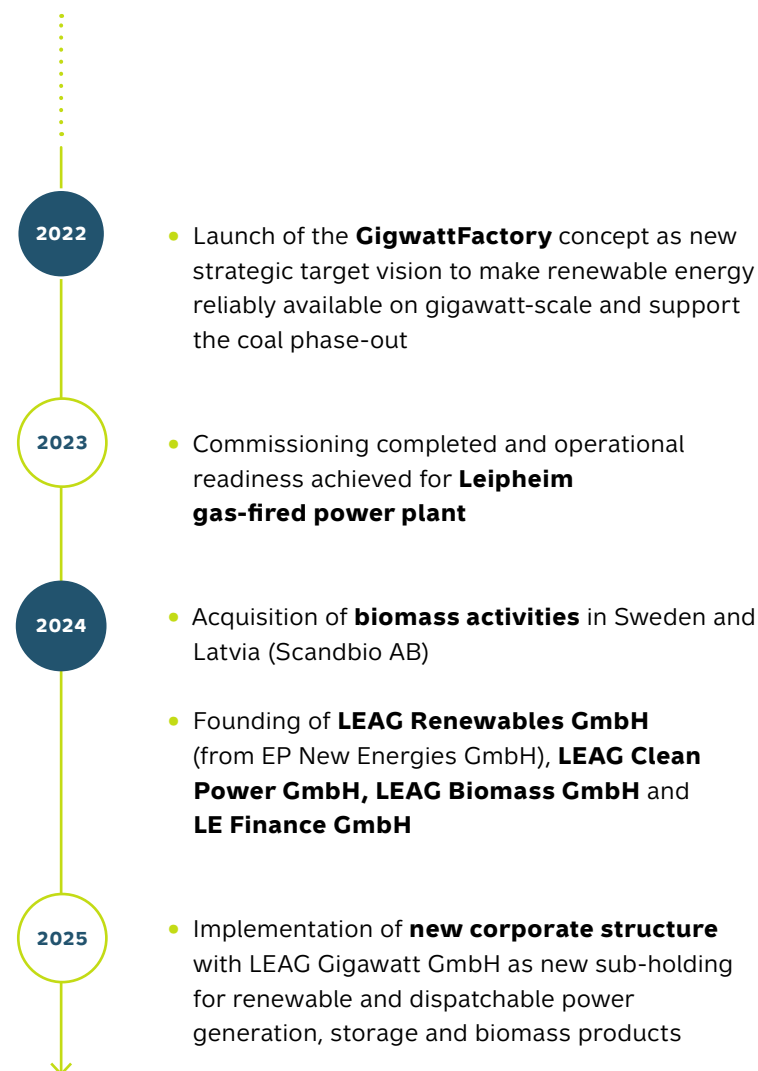
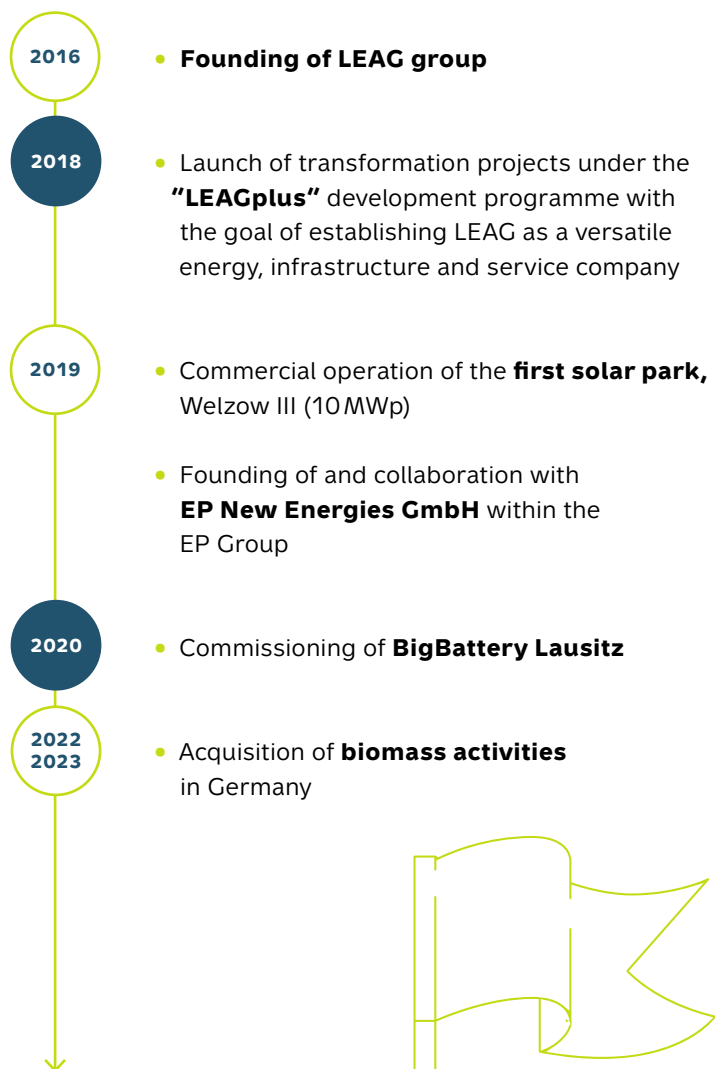
By 2038, coal-fired power generation is to be phased out under the 2020 legislation.

With the legally accelerated phase-out of coal, the strategic realignment was intensified. From 2022 onwards, the GigawattFactory concept provided the framework for LEAG's transformation. The development and implementation of respective projects initially took place in the two operating companies, Lausitz Energie Bergbau AG and Lausitz Energie Kraftwerke AG. In parallel, preparations were made to adapt LEAG's organisational structure to the new strategic direction, enabling it to operate with independent subsidiaries in a focused, agile and competitive manner in its respective core and development markets.

In 2024, the foundation for this new organisational structure under the joint holding company LEAG GmbH was laid, followed by implementation in 2025. Lausitz Energie Bergbau AG and Lausitz Energie Kraftwerke AG – consolidated under Lausitz Energie Verwaltungs GmbH – refocus on their traditional business in the conventional energy sector, while the new business areas for renewable energy, storage and flexible generation continue their operations under the umbrella of LEAG Gigawatt GmbH as a new sub-holding company. A key element of this structural realignment is the Future Agreement, which is jointly supported by the shareholder, the Management Board, the works council and the trade union IGBCE. This reflects the established social partnership and contributes to the stability and implementation of the transformation by securing social support and providing planning certainty for the workforce.

In the summer of 2025, the target structure was finally achieved. The first financial statements for LEAG Gigawatt GmbH to be prepared following the completion of LEAG's organisational transformation – and which therefore provide a comparable basis for future analysis – are the financial statements as of 31 December 2025. For this reason, this year was also taken as the base year for refocusing the Sustainability Report from the LEAG group (previously) to the Gigawatt division.

Timeline & key milestones



Further information on 2025 milestones is provided in the SBM-1 section on strategy, business model and value chain – Highlights 2025.

Corporate development

The transformation within the LEAG group is based on an integrated approach that considers various fields of action. Today, the LEAG group is structured into three main clusters:



1. **The lignite division is responsible for the orderly and profitable implementation of the coal phase-out in accordance with the provisions of the German Coal-Fired Power Generation Termination Act.** It comprises conventional operations, including mining and power plant operations, refinement of lignite-based fuels and associated assets, as well as technical services for repair and maintenance. Further responsibility is the recultivation of opencast mines into versatile landscapes that offer space for agriculture and forestry, as well as nature conservation and recreation, while simultaneously enabling low-conflict, multi-use development with renewable energies.



2. **The systematic development of the GigawattFactory is anchored within the Gigawatt division and forms the core of LEAG's transformation activities.** *A detailed description of the new business segments is provided in chapter E1-5.* The portfolio restructuring primarily utilises internal resources within the LEAG group. These include available land and assets with existing infrastructure, such as 380kV grid connections and logistics links. Furthermore, the transformation process draws on the expertise of energy specialists within the LEAG group and at service partners. To support this, the HR department operates across the entire organisation to support qualification and personnel transfer.



3. **The commercial division focuses on exchange-based electricity trading (e.g., European Energy Exchange, EEX) and ancillary services.** It is being strategically expanded to include business to business (B2B) solutions for electricity and related services. Since 2021, energy cubes GmbH, a subsidiary of LEAG group, has also provided marketing services for third party energy plants, particularly renewable assets and battery storage systems. In the fuel segment, the traditional REKORD brand has been expanded to include wood pellets. In addition, the LEAG group is investing in its own refining plant to gradually replace fossil products with biomass and, through blended products made from lignite and biomass, to facilitate a smoother technological transition for its customers in the future.

LEAG's transformation process is complemented by the targeted growth and increasing independence of further subsidiaries for engineering services (GMB GmbH), maintenance and railway services (MCR Engineering Lausitz GmbH), logistics (Transport- und Speditionsgesellschaft Schwarze Pumpe mbH), and circular economy (SERO Lausitz GmbH). They serve as internal service providers within the group – for example, in specialist foundation engineering for the construction of wind turbines on former mining sites. To strengthen their independence, these units also take on external contracts, gradually evolving into a fourth cluster focused on industrial services.

In the medium term (to 2030) and long term (to 2040), the coal phase-out and associated structural change will lead to adjustments in the organisational and operational structure of the LEAG group, aimed at maintaining business viability while ensuring the fulfilment of long-term obligations, particularly in relation to recultivation. The heating division is currently being developed as a hybrid business unit, addressing both conventional bridging solutions and new heating concepts. In line with Germany's municipal heat planning requirements, which mandate a rising share of green heat, the LEAG group is working to decarbonise district heating for up to 190,000 households in Eastern Germany. Together with municipal utilities and local authorities, economically viable transformation pathways are being developed, including technologies such as power to heat and the use of waste heat. Transitional solutions based on existing plant infrastructure help ease the financial burden on municipalities as they navigate the shift towards climate neutral heating.



LEAG target vision: business model 2030

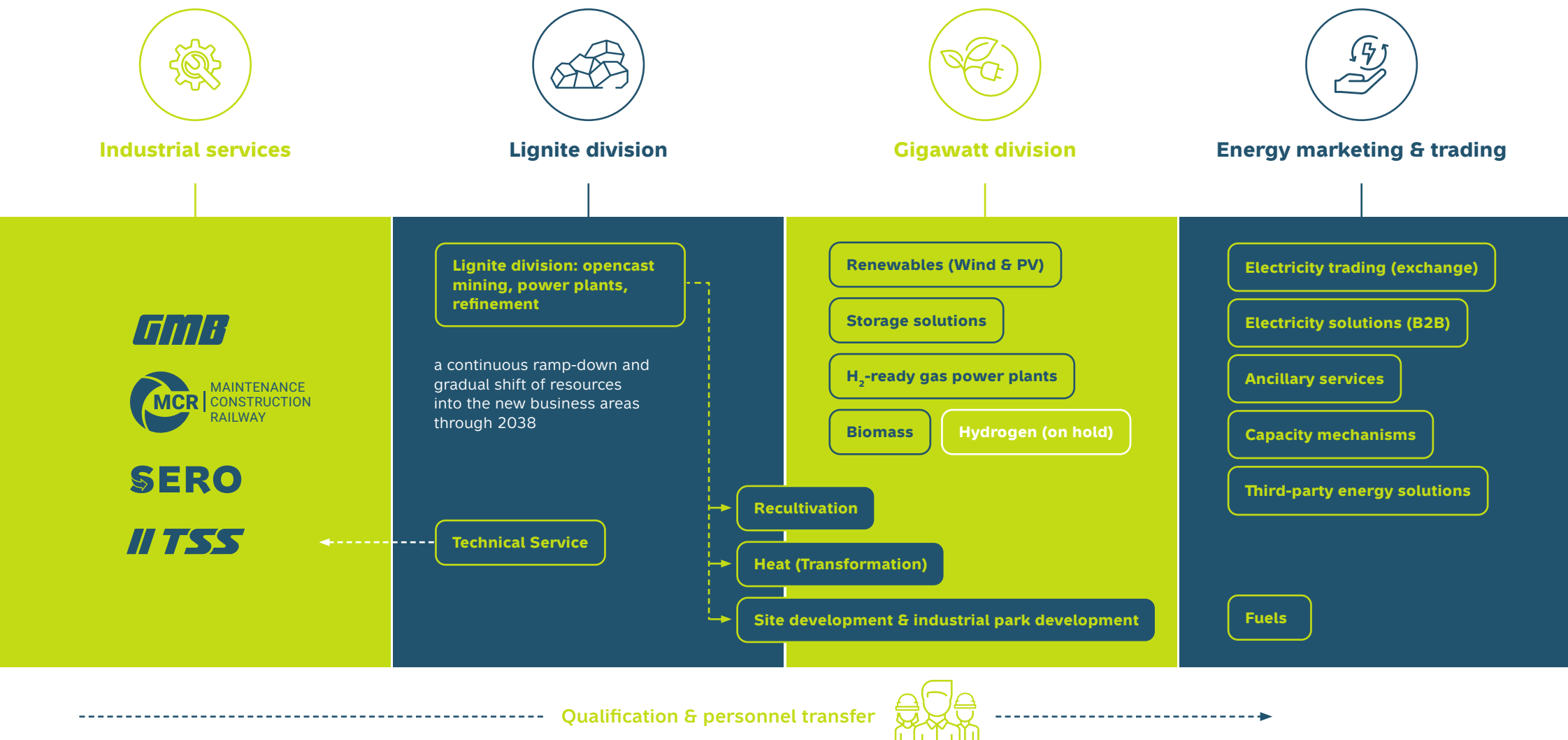


Figure 3: LEAG target vision: business model 2030

BP-1, BP-2

Basis for preparation of the sustainability statement and disclosures in relation to specific circumstances

This document represents the Consolidated Annual Sustainability Report (further “the Report”) issued by LEAG Gigawatt GmbH which bundles the entities within the LEAG group active in the field of renewable energy and flexible energy solutions (together the Gigawatt division). As of 2025, the division comprises the operational entities LEAG Renewables GmbH, LEAG Clean Power GmbH and LEAG Biomass GmbH, as well as LE Finance GmbH.

The LEAG group has published its sustainability reports voluntarily since 2021. Against the backdrop of the group’s strategic restructuring and the separation of the lignite division from renewables and low-emission business areas, the LEAG group has refined its approach to external sustainability communication. Rather than issuing a comprehensive standalone sustainability report on the whole group, the focus is on targeted, decision-useful disclosures aligned with its business strategy and transformation priorities. Key sustainability commitments and objectives remain integrated into the LEAG group’s strategy and governance and will continue to be communicated through its annual reports and publicly available disclosures. The reporting boundary of the sustainability statement is aligned with the consolidation scope used in the financial statements.

The establishment of the Gigawatt division creates a dedicated platform for renewable energy, flexible and low-emission technologies, supported by transparent governance, independent decision-making and a focused financing framework aligned with the requirements of capital providers.



While certain existing renewable assets like Welzow III and Zschornowitz, LEAG's first solar parks, remain allocated to the lignite division on a case by case basis, new future-oriented projects are assigned to the Gigawatt division under **LEAG Gigawatt GmbH**. Accordingly, this report focuses exclusively on the Gigawatt division. This adjustment does not represent a departure from LEAG's history but reflects a necessary step to support the successful ecological, social and economic transformation of the LEAG group.

For the 2025 reporting period, the Sustainability Report has been prepared with reference to the simplified European Sustainability Reporting Standards (ESRS) to reflect the most recent regulatory developments and evolving expectations. Following a mandate from the European Commission, the European Financial Reporting Advisory Group (EFRAG) published draft amended ESRS in November 2025 aimed at reducing the reporting burden while preserving the core objectives of the Corporate Sustainability Reporting Directive (CSRD) and the EU Green Deal. Referencing the simplified ESRS approach was therefore considered appropriate to ensure proportional, decision-useful and future-aligned sustainability reporting.

While the information presented in this Report is generally consistent with the disclosures in the financial statements, the sustainability statement provides broader insights by covering impacts, risks and opportunities (IROs) arising from own operations, also considering some potential IROs across the value chain. For the purpose of this Report, "own operations" refers to activities within the Gigawatt division, while "value chain" refers to upstream and downstream activities.

Although the value chain was considered in the double materiality assessment (DMA) process, data from the value chain has not been collected for the purpose of this Report, reflecting the early stage of data availability and methodological alignment. While the ESRS require the disclosure of value chain-related information, **LEAG Gigawatt GmbH** is reporting on a voluntary basis and intends to address this requirement in future reporting cycles as part of its continuous efforts to enhance data coverage and reporting maturity.

During the preparation of the Report, a DMA was performed to identify and assess both the impacts of the Gigawatt division's activities on the economy, environment and society at large, as well as the financial effects on the division, caused by the risks and opportunities connected to environmental, social and governance (ESG) matters. *For further information please refer to the SBM-3 section (Material impacts, risks and opportunities)*. This reporting cycle does not yet cover the critical assumptions used to quantify the anticipated financial effects, nor the sources and level of uncertainty associated with those assumptions.

The sustainability statement primarily covers own operations. Upstream and downstream value chain impacts are considered at a qualitative level through the materiality assessment; however, quantitative disclosures are currently limited due to data availability constraints.

Metrics are collected from the companies within the Gigawatt division, leveraging local management systems. These metrics are primarily derived from process data systems, measurements, calculations and procurement data. Controls are in place to ensure the completeness, accuracy and reliability of the reported information. However, some metrics are subject to methodological improvements, as not all required information is currently available through direct measurement or activity-based data assessment, particularly related to Scope 3 greenhouse gas (GHG) emissions. Where activity-based data is not available, estimation approaches are applied, including spend-based methods. Potential areas for improvement in data availability were identified, particularly with regard to consistent data collection and availability at the level of each individual company within the Gigawatt division. Estimation methods may be further applied and refined in future reports.

Furthermore, the option to omit specific information has been applied in certain cases where disclosure could be confidential in nature or could adversely affect the security or competitive position of the Gigawatt division. Where considered appropriate, the existence of such omissions and the general rationale for non-disclosure are indicated.

This Report has been prepared with reference to the principles of high-quality reporting, including accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability, with the aim of providing stakeholders with a clear and structured overview of the Gigawatt division's efforts.

To facilitate alignment between non-financial and financial reporting, all assessments within this Report adhere to the time horizon definitions set forth in the ESRS. The short-term period corresponds to the current reporting year, the medium-term horizon extends up to five years, and the long-term time horizon refers to periods beyond five years.

LEAG Gigawatt GmbH with its sub-holding structure does not currently fall within the scope of the CSRD but has chosen to report with reference to the simplified ESRS voluntarily, as part of the commitment to transparency and responsible corporate governance. At the same time, no phase-in provisions were applied, as these are not applicable to undertakings outside the scope of the CSRD.

As this is a voluntary Sustainability Report, the content of the sustainability statement has not been subject to an external assurance. Consequently, no Independent Practitioner's Report on a Limited Assurance Engagement has been issued.



SBM-1

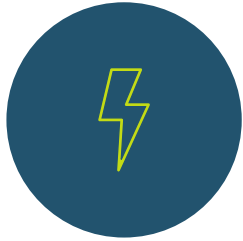
Strategy, business model and value chain

The Gigawatt division is driving forward the profound transformation of the LEAG group as an energy transition company. This will enable LEAG to continue fulfilling its role as a significant economic player, employer and training provider in the region and to actively shape the economic landscape of Eastern Germany.

Business activities of LEAG's Gigawatt division

As outlined in the GigawattFactory target state, the Gigawatt division combines wind and photovoltaic plants with flexible capacities in storage facilities and power plants into an integrated, scalable and low-emission energy portfolio. *The climate change mitigation approach and the related implementation actions on project-level are described in chapters E1-1 and E1-5.*

This is complemented by biomass as additional energy source, which is advancing the transition to lower-emission fuels for customers. The portfolio diversification ensures a continuous and demand-driven supply in an energy system increasingly based on renewable generation.



Electricity business

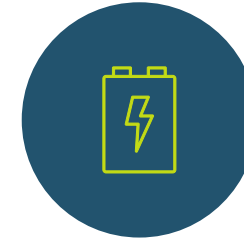
Renewable energy plants are currently in operation at five locations in Eastern Germany and four locations in the Czech Republic. The electricity generated is sold on the European electricity market, thus competing internationally with other electricity producers. The gas-fired power plant in Leipheim (300 MW in Bavaria) is a "special grid-related asset" for the transmission system operator Amprion and does not participate in the electricity market.



Renewable energies

The renewable energies business unit under **LEAG Renewables GmbH** focuses on developing an energy portfolio in the wind and photovoltaic (PV) sectors, primarily on LEAG-owned post-mining land as well as on land owned by third parties. The goal is to expand the generation portfolio based on renewable energies to compensate for the declining conventional generation within the LEAG group.

In 2025, additional wind and photovoltaic assets were commissioned, and major projects progressed in construction and permitting. *The project-level actions, including capacities and implementation status, are presented in chapter E1-5.*

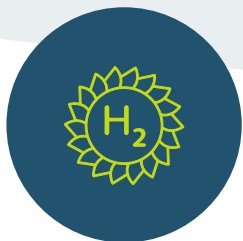


Battery storage

Battery energy storage systems (BESS) are essential components of the energy sector of the future. Through rapid charging and discharging, they provide a buffer between electricity generation and consumption. At all LEAG power plant sites, the potential contribution of new storage systems to optimisation, flexibility and availability is currently being assessed. In addition to the provision of ancillary services, the storage projects developed by **LEAG Clean Power GmbH** primarily serve to improve the integration of renewable energy sources into the energy supply system through load shifting on a gigawatt scale.

In 2025, the storage portfolio further progressed from concept evaluation to project execution, with first gigawatt projects entering the implementation phase. Further details are provided in chapter E1-5.





Gas-fired power plants and decarbonisation pathways

Gas-fired power plants provide a dispatchable back-up solution during periods of low renewable energy feed-in and offer a climate-friendly perspective through conversion to hydrogen. Germany is planning to establish and safeguard the required capacity under a new act to secure electricity supply and capacity adequacy.

To enable timely implementation once the necessary regulatory framework is in place, **LEAG Clean Power GmbH** has made significant progress in planning such capacities, including permitting steps at key sites. *Project-level details, timelines and dependencies are described in chapter E1-5.*



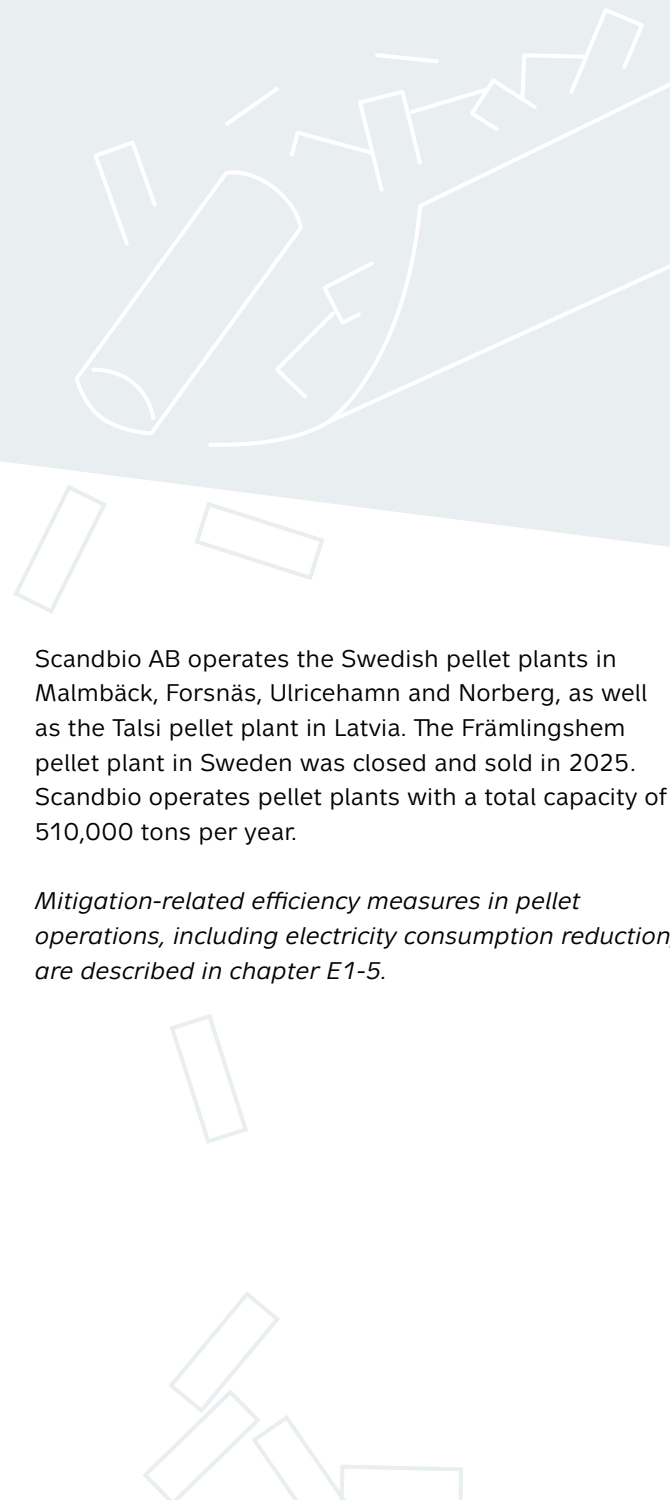
Biomass

The strategic acquisitions of pellet plants in Germany, Sweden and Latvia – consolidated under **LEAG Biomass GmbH** – position the company as one of Europe's leading wood pellet suppliers, based on responsible sourcing and recognised sustainability standards, ensuring reliable heating solutions for industry, commerce and households. The business combines the production and distribution activities of the German company LEAG Pellets GmbH and the Swedish company Scandbio AB. Its overarching goal is to convert the LEAG group's solid fuel production and product portfolio from fossil fuels to climate-neutral solutions.

The German plants in Wismar, Schwedt, Löbau and Oranienbaum, with a total capacity of approximately 460,000 tons per year, have been consolidated under the umbrella of LEAG Pellets GmbH. Furthermore, the company is the majority shareholder of Best Pellets Handelsgemeinschaft GmbH, one of the largest end-customer pellet retailers in Germany.

Scandbio AB operates the Swedish pellet plants in Malmö, Forsnäs, Ulricehamn and Norberg, as well as the Talsi pellet plant in Latvia. The Främlingshem pellet plant in Sweden was closed and sold in 2025. Scandbio operates pellet plants with a total capacity of 510,000 tons per year.

Mitigation-related efficiency measures in pellet operations, including electricity consumption reduction, are described in chapter E1-5.





Finance

LE Finance GmbH was established to manage the financial affairs of the LEAG group companies. Its business purpose is to raise and provide all forms of financing, including guarantees and sureties, to invest funds, to manage liquidity and process payments, and to advise other companies. Its primary focus is on supporting the entities of the Gigawatt division in developing renewable, storage and low-emission generation projects for the future. Among other things, LE Finance ensures that forward-looking investments can be financed by banks or other partners and do not conflict with their internal policies. For this purpose, LE Finance also provides support in relation to sustainability reports, ESG ratings and related matters.



Value chain of Gigawatt division

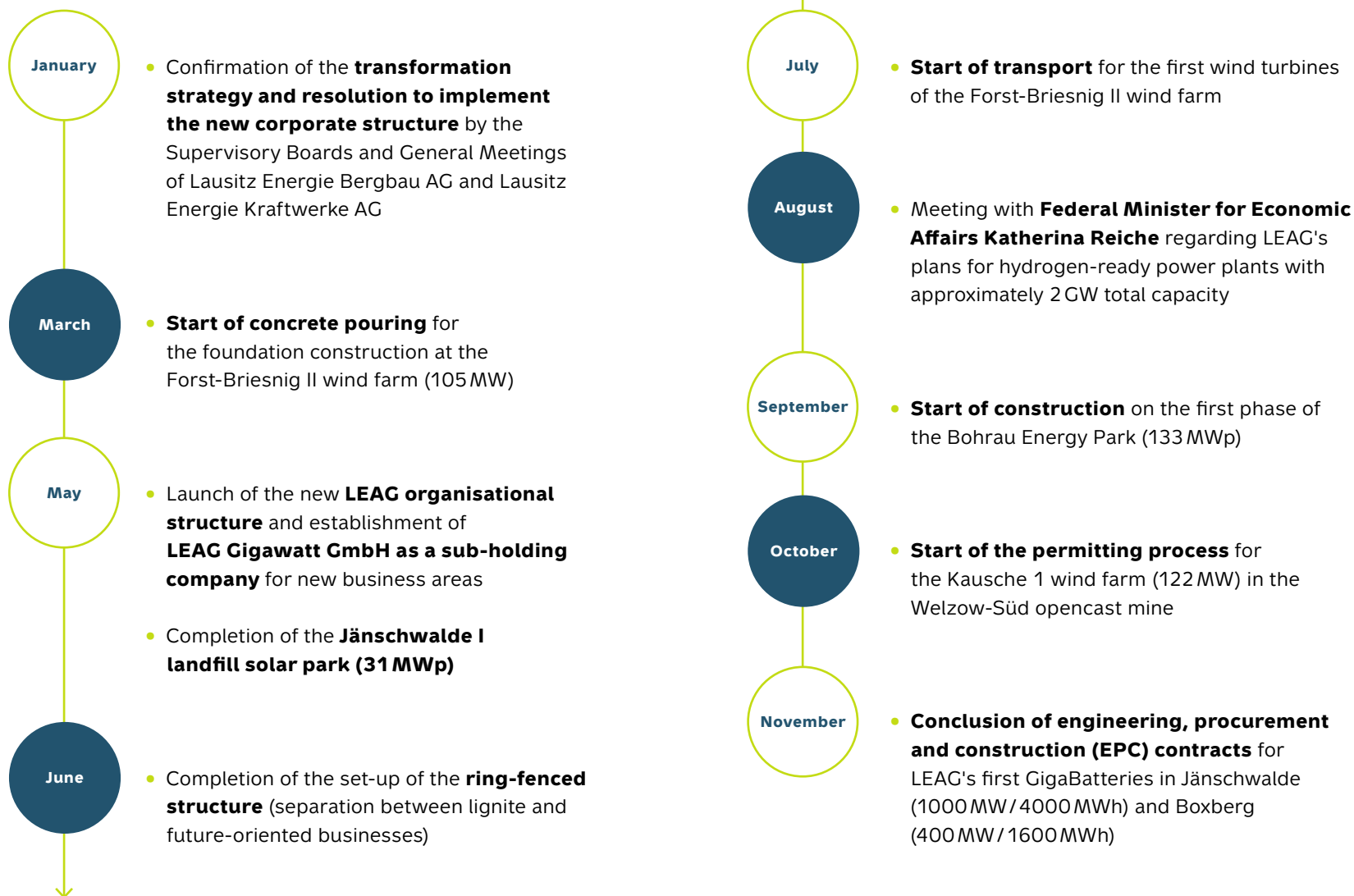
The Gigawatt division operates across several stages of the energy value chain, with a primary focus on the development, construction and operation of renewable and flexible energy assets.

Upstream activities comprise the procurement of external inputs required for project development and operations. These include technical and environmental studies provided by planning offices and expert consultants, the sourcing of major equipment such as wind turbines, photovoltaic modules, batteries and electrical infrastructure components (e.g. transformers, switchgear, cabling and control systems), as well as construction services. Upstream activities also include the procurement of biomass feedstock, natural gas and auxiliary materials, as well as financial and advisory services. Land is sourced from a combination of LEAG-owned post-mining land and existing industrial and energy infrastructure sites, and land leased or acquired from third parties.

Core activities (own operations) cover the main phases of project development and asset operation. This includes site acquisition, project development, permitting and the management of construction processes, as well as electricity generation from renewable and flexible assets. A key focus is placed on the operation of renewable generation facilities and the provision of flexibility through gas-fired power plants and battery energy storage systems, supporting grid stability and the integration of renewable energy. Construction is typically executed through external contractors but remains under the oversight of the respective project entities. Core activities also include biomass pellet production and trading, supported by central functions such as financing, risk management, compliance and sustainability reporting.

Downstream activities are limited and mainly relate to the sale of electricity via energy markets and the distribution of biomass products to industrial, commercial and retail customers.

Highlights 2025



A shared strategic understanding as the foundation for transformation

Corporate strategy and ESG alignment

A successful transformation requires a shared strategic understanding across the entire organisation. As LEAG navigates one of the largest structural shifts in its corporate history – the transition from a coal-based utility to a diversified, future-oriented energy group – a unified

framework of principles is essential for guiding decisions, behaviours and long-term priorities. This shared orientation ensures that all business units, functions and employees can act consistently and purposefully during a period of significant operational, technological and cultural change.

A photograph of a person's hands reaching out towards a bright sunset over a field. The person is wearing a light-colored, textured sweater. The hands are positioned in the foreground, with fingers slightly spread, reaching towards the sun. The background shows a blurred landscape with a body of water and distant hills under a warm, golden sky.

New vision, mission and values under a common holding structure

At the beginning of 2025, the LEAG group introduced a new set of guiding principles consisting of a vision, mission, values and a renewed Code of Conduct. Together, they form the LEAG's normative framework and provide clarity for day to day operations as well as for the individual responsibilities of all employees, including the Gigawatt division.

Mission

- **People full of energy** – The knowledge, experience and commitment of LEAG's employees form the foundation of a secure energy supply and a sustainable future.
- **Innovative solutions for energy security** – Land, infrastructure and facilities are leveraged to ensure a robust, future-oriented energy system.
- **Responsibility for a sustainable future** – From the rehabilitation of post-mining land to the development of sites for new economic use and the preservation of long-term commercial stability.

Values



Appreciation:

Transparency, respect,
solidarity



Reliability:

Cooperation, commitment,
trust



Agility:

Vision, courage,
flexibility



Performance:

Personal responsibility,
excellence, development

These principles are implemented under the shared governance of LEAG GmbH, ensuring consistency and alignment across all business divisions, entities and subsidiaries. For the Gigawatt division as the most growth oriented business area, the new mission and values have particular significance. As the division focuses on renewable power generation and technologies supporting the integration of renewable energy, it plays a key role in LEAG's transformation.

- **Appreciation and reliability** provide stability in the face of rapid technological and market developments, strengthening employee retention and fostering dependable partnerships with a broad range of stakeholders.
- **Agility** is essential for responding to dynamic regulatory frameworks, developing new business models and integrating emerging technologies.
- **Performance** drives progress, excellence in project execution and the ability to expand new business fields such as battery storage on a gigawatt scale and district heating transformation, supported by the continuous development of employee skills.

The Gigawatt division reflects the cultural and strategic shift required to support the LEAG group's long-term ambition to evolve into a diversified provider of energy and infrastructure solutions.

Strategic transformation under “NextGen.machen”

Building on this cultural foundation, the new organisational structure separates established operations from new growth businesses, strengthening the autonomy of the new units while maintaining coordinated leadership through the parent company LEAG GmbH.

In 2025, the LEAG group also conducted a systematic analysis of its core processes as part of the group-wide optimisation programme “NextGen.machen”. The programme is built on three key commitments:

- A new level of **flexibility**
- A strengthened long-term **cost awareness**
- A significantly enhanced **market orientation**

These commitments are operationalised through concrete actions in five areas:

- **Profitability**
- **Flexibility**
- **New products & markets**
- **Cost leadership**
- **Locations & reuse**

Implementation is supported by digital solutions delivered through a reorganised IT department and an extensive training and personnel transfer programme, ensuring the workforce is equipped for new operational and technological requirements.



Sustainability foundations and 2025 as a turning point

The sustainability strategy for the LEAG group, including the Gigawatt division, is developed at the holding level and applies to all business divisions and entities. It builds on the frameworks established in 2024 and 2025, especially the core priorities of LEAG's sustainability approach, reinforced by governance instruments such as the Code of Conduct, corporate principles, purchasing rules and compliance standards. Following the completed organisational changes, the corporate strategy process has evolved in 2025, leading to a refined sustainability approach and strategy, guided by defined principles.

The process is driven by the **Sustainability Officer**, who ensures group-wide coordination and alignment with international frameworks such as the UN Sustainable Development Goals and the German sustainability strategy.

A consolidated sustainability strategy for the Gigawatt division as a part of the LEAG group

Strategic positioning and ESG priorities (2024 and 2025)

As part of its due diligence and materiality assessment (DMA), LEAG identified six core fields of action:

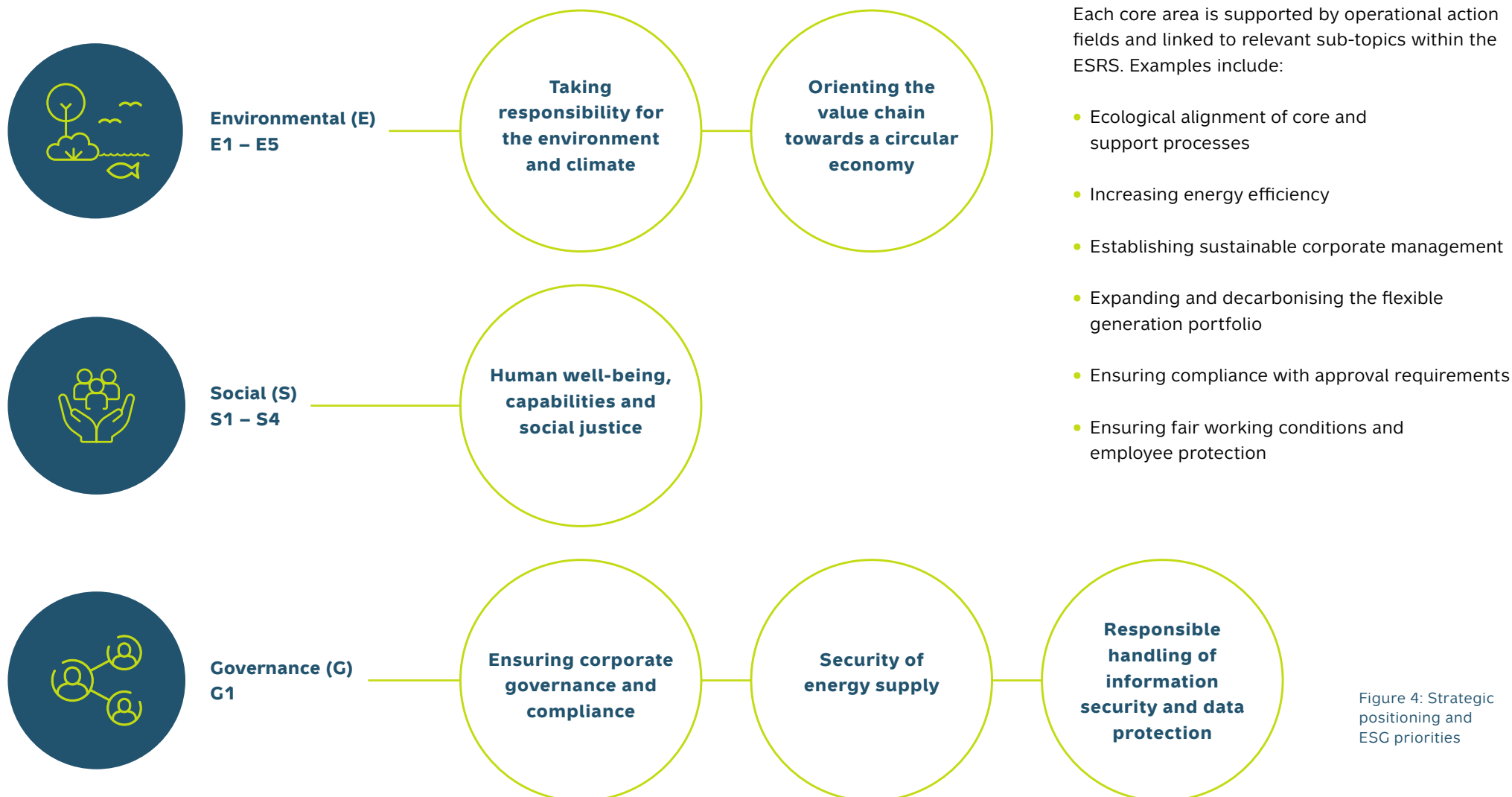


Figure 4: Strategic positioning and ESG priorities



All managers within the LEAG group who fall within the defined group of senior managerial employees (Leitende Angestellte) contribute to ESG targets, which are directly linked to a part of the flexible component of their compensation.

Outlook: strategy realignment

With the new corporate strategy in place, the sustainability approach will be further refined to efficiently support the strategic direction. Sustainability targets and corporate principles will be updated in 2026 to align with the requirements for 2027. This ensures that the sustainability approach continues to guide the LEAG group's transformation towards a low-emission and competitive business model.

Corporate principles for sustainability in daily practice

In 2025, the LEAG group continued to operate under the corporate principles that had been in effect in previous years. These corporate principles apply across the LEAG group and therefore also to the Gigawatt division; accordingly, they are articulated at group level.

The principles formed the cultural and procedural foundation for the transformation measures undertaken during the reporting year. As part of the group's realigned strategy and governance architecture, these corporate principles are comprehensively revised in 2026 to ensure full alignment with the new strategic direction, mission and values. They will enter into force from mid-2026 onwards. For the purposes of this Report, however, the principles applicable in 2025 remain authoritative and are presented as the basis on which the further development was built.

Corporate principles



Securing supply

As a reliable provider of electricity, heat and refined fuels, the LEAG group focuses on quality while advancing the transformation of the energy sector through renewable energy, energy storage and integrated energy and industrial solutions.



Ensuring safe working conditions

Health, environmental, fire and occupational safety are prioritised to maintain a safe, healthy and motivating work environment for employees and service partners.



Qualifying and motivating employees

Investment in employee development is central to the strategy, supported by high-quality training to cultivate future talent and offer career prospects.



Ensuring public acceptance

Regional acceptance for all energy production activities is promoted through transparent communication and active dialogue with local administrations and communities.



Minimising environmental impact

Interventions in the natural landscape are intended to be limited to an unavoidable level. As regards the lignite division, mining areas are recultivated into versatile landscapes. Emissions are reduced through technology, and efficiency of power plants is increased.



Conserving resources

Reducing the consumption of resources is achieved through continuous optimisation of energy-related performance and material use. Activities are planned with a regular and systematic analysis.



Becoming more efficient, flexible and digital

Efforts are continually made to enhance the efficiency and flexibility of processes and to fully leverage the opportunities of digitisation. LEAG group's integrated management system is aligned with internationally recognised standards.



Ensuring legally compliant conduct

Compliance with existing laws, regulations as well as internal requirements is a matter of course. A comprehensive compliance management system and continuous awareness-raising among all employees ensure that risks can be identified, assessed and managed at an early stage.



Maintain data protection and information security

The principles of data protection are anchored in all processes. Information is handled responsibly to ensure its confidentiality, integrity and availability.



Plant integrity

LEAG ensures that its power plants operate effectively and precisely while at the same time protecting the environment and the well-being of personnel and equipment. Plant integrity refers to the entire operation of a plant and therefore the life cycle.

ESG ratings

As part of its ESG strategy, a second external ESG rating was conducted for LEAG GmbH in 2025. ESG ratings are generally regarded as an effective tool for gaining additional perspectives on sustainability performance and may therefore also be considered as a potential instrument for the Gigawatt division going forward.

Governance of sustainability matters

GOV-1

Governance bodies

The governance of LEAG Gigawatt GmbH and its sub-holding structure is embedded within the overarching governance framework of LEAG GmbH.

Strategic and fundamental management responsibilities, including sustainability-related decision-making, are exercised at group level by the **Management Board of LEAG GmbH**. The Management Board of LEAG GmbH is identical in composition to the Management Boards of the group's stock corporations Lausitz Energie Bergbau AG and Lausitz Energie Kraftwerke AG, ensuring consistent governance across all group entities, including the Gigawatt division.

The **Supervisory Board of LEAG GmbH** provides oversight of the Management Board. This oversight is exercised through regular reporting and structured exchanges with the Management Board, including discussion on impact management and other relevant matters. Decisions are taken either in meetings or, where appropriate, by written circular resolution. Information submitted to the Supervisory Board covers, among other

items, this Sustainability Report, annual and interim financial information, health and safety report, and detailed operational data.

Sustainability considerations are integrated into governance processes across all business divisions, including LEAG Gigawatt. Accordingly, the administrative, management and supervisory bodies are actively involved in managing impacts on the economy, the environment and the society. To strengthen coordination and oversight of ESG topics, the central function of a **Sustainability Officer** was established in 2023 to steer, coordinate and monitor ESG topics from both a qualitative and quantitative perspective.

The administrative, management and supervisory bodies bring relevant expertise in sustainability, strategy and business conduct matters, including regulatory compliance and stakeholder engagement. Sustainability topics are embedded in governance processes through defined reporting lines and recurring agenda items. The Sustainability Officer supports this by coordinating inputs, preparing decision-support materials and tracking follow-up actions.

Operational management of LEAG Gigawatt division

Within the Gigawatt division, management responsibilities focus on the operational performance and financial results of the respective business activities, while sustainability governance and strategic ESG oversight are centrally coordinated at LEAG GmbH level and embedded in operational management across the group. Regular exchange takes place between the Management Board at group level and the Managing Directors of the operating companies within the Gigawatt division. In some cases, responsibilities overlap through dual mandates (e.g., the Chief Financial Officer at LEAG group level also serves as Managing Director of LEAG Clean Power GmbH and LE Finance GmbH). This governance set-up ensures aligned decision-making, uniform standards and effective control mechanism for sustainability matters across the group, including the Gigawatt division.

Supervisory Board

Selection to the Supervisory Board of LEAG GmbH is based on professional expertise and the ability to contribute to the company's strategic objectives. This includes, among other factors, an understanding of stakeholder perspectives and established experience in engaging with relevant interest groups. All Supervisory Board members must declare their independence, including aspects relevant to avoiding conflicts of interest.

The remuneration of the Supervisory Board is determined by the Shareholders' Meeting of LEAG GmbH and is aligned with recognised governance principles, including relevant recommendations of the German Corporate Governance Code.

The Supervisory Board of LEAG GmbH consists of twelve members, including two women. Six shareholder representatives and six employee representatives are elected in accordance with the **German Co-Determination Act 1976**.

Committees

The Supervisory Board members have formed one (standing) committee. The **Investment Committee** supports the Supervisory Board by conducting preliminary reviews of the corporate planning, the annual financial statements and the management report. It also addresses accounting-related matters and submits proposals for the allocation of profits. In addition, the committee advises the Management Board of LEAG GmbH on investment-related topics and the development of new business opportunities. In this way, the committee contributes to LEAG's overarching commitment to responsible business conduct and complements the roles of the Supervisory Board and the Management Board.

Floating PV Cottbuser Ostsee to be commissioned in 2026



Management Board as of 31.12.2025

The Management Board of LEAG GmbH manages the LEAG group and is responsible for its affairs in accordance with existing laws and statutes. In exercising their management responsibilities, the Management Board members are obligated to comply with the restrictions on management powers imposed by the shareholder, supervisory body, the Articles of Association and the Rules of Procedure, in accordance with statutory provisions.



Adi Roesch, Chief Executive Officer (CEO) and Chief Operating Officer (COO) of Lausitz Energie Bergbau AG and Lausitz Energie Kraftwerke AG, assumed responsibility as CEO of LEAG GmbH (formerly named as Lausitz Energie Verwaltungs GmbH) in September 2024. Before joining LEAG, he chaired the management of Köster GmbH and served as CEO of Köster Holding SE, one of Germany's leading construction groups. Earlier in his career, he held several top management positions at General Electric, GE Power and Alstom Group. Adi Roesch graduated with a degree in industrial engineering from the University of Karlsruhe.

Thomas Merker is Chief Financial Officer (CFO) of Lausitz Energie Bergbau AG and Lausitz Energie Kraftwerke AG, a position he has held since May 2025, and was appointed to the Management Board of LEAG GmbH in the same month. Prior to this, he served as Finance Director at GasNet, the largest gas network operator in the Czech Republic. Earlier in his career, he held senior finance positions at international energy companies with a focus on Eastern Europe, including RWE Czech Republic. Thomas Merker is a graduate economist and completed his studies in Jena and Würzburg.



Jörg Waniek is Chief Human Resources Officer (CHRO) on the Management Boards of Lausitz Energie Bergbau AG and Lausitz Energie Kraftwerke AG, a role he has held since August 2019, and was appointed to the Management Board of LEAG GmbH in January 2020. Prior to that, he headed Human Resources Management at LEAG's lignite division and at the predecessor companies Vattenfall Europe Mining AG and Vattenfall Europe Generation AG for ten years. Mr Waniek studied at the University of Bayreuth and the Friedrich-Alexander-University of Erlangen-Nuremberg. He holds a degree in law from the latter.

Sustainability information and oversight by governance bodies

To ensure that the administrative, management and supervisory bodies are adequately informed and able to integrate sustainability considerations into strategic decision-making, a structured ESG governance process is in place.

The **Sustainability Officer** coordinates and advances sustainability management at LEAG GmbH level and is mandated to integrate sustainability aspects into the business model. This includes coordinating ESG reporting requirements in alignment with the ESRS, supporting the financing readiness of the renewable energy portfolio and driving an integrated, group-wide approach to sustainability strategy development.

Key responsibilities include overseeing sustainability-related aspects that affect process design and process orientation, coordinating information and data across functions, preparing ESG reporting content and tracking the implementation of sustainability measures. The role also covers internal alignment on ESG topics, preparation of decision-supporting materials for executive bodies, regular communication and responses to ESG-related inquiries.

The Sustainability Officer brings relevant expertise from extensive auditing experiences (ISO 9001) and consulting on integrated management systems (ISO 9001, ISO 14001). This encompasses reviewing legal requirements, optimising processes and advancing management system development, as well as contributing sector-specific input to sustainability reporting on holding level. This background demonstrates expertise in ESG reporting, regulatory compliance, stakeholder engagement and sustainability strategy in an industrial context.

The Sustainability Officer exercises cross-functional coordination and advisory authority, including decision-making in defined operational areas related to ESG tasks. Strategic decisions and cross-divisional approvals remain with responsible specialist functions or the executive management, ensuring clear governance boundaries and accountability. Collaboration works cross-functionally with several areas such as controlling, treasury, communication, HR, procurement and environmental management to ensure integrated execution.

Since Q4/2024, the position has been anchored within the Corporate Development & Strategy department. Regular strategic coordination is led by the **Head of Corporate Development & Strategy** through regular alignment meetings with the **CEO** of LEAG GmbH, enabling efficient feedback loops on operational sustainability matters. Decision-relevant ESG topics continue to be presented by the Sustainability Officer either directly to the CEO or in meetings of the Management Board and, where appropriate, are also addressed with the Supervisory Board. The CEO remains responsible for ensuring that relevant sustainability information is communicated to the **Supervisory Board**. Decisions and action items arising from these governance discussions are documented by the Board Office (responsible for supporting the Management Board of LEAG GmbH and the supervisory body), while tracking and follow-ups are carried out by the Sustainability Officer.

In addition, a **Sustainability Panel** has been established as a recurring digital information format for all managers of the LEAG group, including managers within the Gigawatt division. Held at least quarterly, it provides updates and insights on ESG topics and serves as a multiplier platform. It also includes practical tasks and company-specific guidance.



Rendering of the planned GigaBattery project in Jämschwalde

Key sustainability matters addressed during the reporting period

During the reporting period, the Management Board was informed about and discussed several key sustainability-related matters, including the implications of the Omnibus procedure, measures to improve energy efficiency in buildings, legal developments related to the EU Taxonomy and regulatory requirements arising from the Corporate Sustainability Due Diligence Directive (CSDDD).

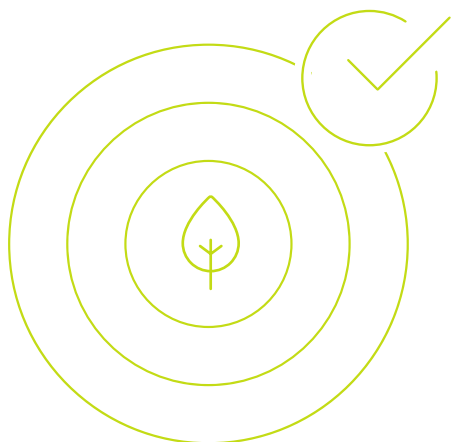
The Management Board was regularly involved in decisions on sustainability-related matters, including the further development of the sustainability strategy and the approval of sustainability reporting, while specific topics (e.g. human resources or investments) were addressed individually as required. In parallel, the corporate principles were subject to a review process aimed at alignment with the new corporate strategy, which continued into 2026.

In preparing this Sustainability Report, the Management Board and the Supervisory Board were involved in the DMA process and were given the opportunity to raise questions and provide feedback on the results. The Sustainability Report was reviewed by the Management Board and subsequently provided to the Supervisory Board for information.

GOV-2

Integration of sustainability-related performance in incentive schemes

To effectively implement the sustainability strategy, sustainability goals have been anchored in management's target agreements starting in 2025. This approach links sustainability objectives to specific, measurable achievements, ensuring that progress can be tracked and evaluated over time.



Examples of such targets include:

- milestones in the commissioning and ramp-up of renewable generation capacity (wind and photovoltaics)
- progress in permitting and approval procedures for renewable projects (including processes under the Federal Immission Control Act)
- utilisation of reclaimed land for renewable energy development
- key implementation milestones for battery energy storage systems (e.g., construction start and commissioning)
- energy-efficiency upgrades and operational improvements in biomass pellet production
- completion of external ESG assessments, such as ESG ratings

To further emphasise the strategic importance of ESG topics, LEAG links these targets to performance-based compensation for managers within the defined group of senior managerial employees, including **LEAG Renewables GmbH, LEAG Clean Power GmbH, LEAG Biomass GmbH** and **LE Finance GmbH**. As decided in 2024, 10% of the total variable compensation for this group is tied to the achievement of at least one ESG-related goal. This transparent connection reinforces the integration of sustainability considerations into performance management and the long-term strategic direction.

The targets for senior managerial employees are discussed and negotiated by the Management Board of LEAG GmbH and the spokesperson of the **Executive Staff Committee**. At the end of the year, the respective line manager or responsible Management Board member determines the level of target achievement for each managerial employee.

GOV-3

Statement on due diligence

The due diligence process informs the assessment of material IROs. International instruments such as the UN Guiding Principles on Business and Human Rights are observed and integrated into corporate practice. The mapping shows how the main aspects of the due diligence process are addressed within the sustainability statement, with references to the relevant ESRS Disclosure Requirements.

¹ governance

² general disclosure requirements on policies

³ general disclosure requirements on actions

⁴ general disclosure requirements on metrics

⁵ general disclosure requirements on targets

Due diligence aspect	Description of actions	Section in Sustainability Report	Link to relevant disclosure requirements
1. Embedding due diligence in governance, strategy and business model	Alignment between corporate strategy and sustainability strategy is evidenced through internal ESG objectives. Operational targets falling within the ESG cluster are strategically relevant.	- Governance bodies (GOV-1)¹ - Integration of sustainability-related performance in incentive schemes (GOV-2) - Material impacts, risks and opportunities (SBM-3)	ESRS 2 GOV-1, GOV-2, SBM-3
2. Engaging with affected stakeholders	Engaging stakeholders to understand and address the sustainability impacts on people and the environment.	- Governance bodies (GOV-1) - Interests and views of stakeholders (SBM-2) - Policies adopted to manage material sustainability matters (GDR-P)²	ESRS 2 GOV-1, SBM-2, GDR-P
3. Identifying and assessing negative impacts	Identifying and assessing negative sustainability impacts in operations, value chains and business relationships.	- Description of the process to identify and assess material impacts, risks and opportunities (IRO-1) - Material impacts, risks and opportunities (SBM-3)	ESRS 2 IRO-1, SBM-3
4. Taking action to address negative impacts	Taking measures to prevent, mitigate and remedy negative impacts through strategic actions.	Actions and resources in relation to material sustainability matters (GDR-A)³	ESRS 2 GDR-A
5. Tracking effectiveness	Monitoring and evaluating the effectiveness of actions taken to address negative impacts.	- Metrics in relation to material sustainability matters (GDR-M)⁴ - Tracking effectiveness of policies and actions through targets (GDR-T)⁵	ESRS 2 GDR-M, GDR-T

Table 1: Main aspects of the Gigawatt division's due diligence process

Due diligence process

Embedding due diligence in governance, strategy and business model

Sustainability-related risks and opportunities are being integrated into the Gigawatt divisions governance structures, business model and strategy. While this integration is still ongoing, sustainability considerations are increasingly seen as a strategic factor alongside regulatory compliance across all levels of decision-making. In future reporting cycles, particular attention will be given to further strengthening the role of administrative, management and supervisory bodies in overseeing and guiding sustainability matters, ensuring that they are consistently informed and actively involved in shaping the division's sustainability direction.

Engaging with affected stakeholders

Stakeholder engagement is critical to the due diligence process. The companies of the Gigawatt division engage with a broad range of stakeholders, including employees, financial institutions, business partners and communities affected by their operations. This dialogue helps identify and understand sustainability risks, facilitating the development of effective mitigation strategies.

Identifying and assessing negative impacts

Regular impact assessments are currently conducted across the operations of the Gigawatt division to identify and address actual and potential negative impacts. These assessments help prioritise actions based on the severity and likelihood of the impacts identified. In future reporting cycles, it is planned to expand the scope of assessments to place greater emphasis on impacts across the broader value chain of the Gigawatt division, including both upstream and downstream relationships. This will help improve the understanding and management of sustainability risks and opportunities throughout all business operations.

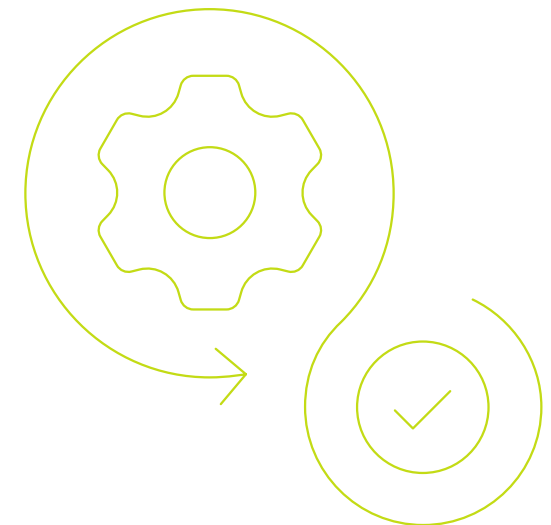
Taking action to address negative impacts

Material actual and potential negative impacts of the Gigawatt division have been identified through ongoing assessment processes. While actions are already implemented to address actual negative impacts, future reporting cycles will place greater focus on developing and implementing targeted measures for potential impacts. These efforts will be integrated into the broader sustainability strategy, ensuring a more proactive approach to mitigating adverse effects across the division's operations and value chain.

Tracking effectiveness

The effectiveness of actions is continuously tracked and evaluated through performance metrics, targets and regular reviews. This process helps determine whether the actions are successful in mitigating sustainability risks and impacts, and if adjustments are needed to improve outcomes.

The due diligence process is an ongoing practice embedded into the core of the LEAG group's operations and strategy. Continuous identification, assessment and mitigation of negative impacts ensure that sustainability goals and regulatory obligations are met within the Gigawatt division. The provided mapping demonstrates how these due diligence elements are reflected throughout the Report.



GOV-4

Risk management and internal controls over sustainability reporting

Risk management and internal control processes support reliable sustainability reporting for the Gigawatt division. These processes are embedded in the LEAG group's risk management system and are designed to identify, assess, manage and monitor risks – also in relation to sustainability disclosures – including regulatory, data and process-related risks.



The risk management framework is centrally coordinated by the **Risk Management function**, with implementation supported by risk owners in the individual business units. Sustainability-related risks are identified and assessed on a regular basis. The Gigawatt division utilises the Risk Management Evaluation logic matrix established in its **Risk Management Policy** as part of the DMA for sustainability reporting. Furthermore it is planned to further strengthen the integration of ESG-risks within the enterprise-wide risk management system.

Internal controls over sustainability reporting focus on ensuring the completeness, integrity and consistency of ESG data, as well as the accuracy of estimations and assumptions used where quantitative data is derived. Data is collected through a combination of system-based and manual processes. Where available, the **Controlling function** captures data through existing systems, while additional information is obtained directly from relevant functional units through structured data requests. The definition of required data is supported by templates aligned with the DMA, ensuring clarity on data requirements and transparency regarding data availability and gaps. Data handling is organised through centrally maintained files and structured data exchanges with the relevant functional units, typically on a need-to-know basis.

As part of the ESG reporting process, collected data is subject to plausibility checks and is reviewed for consistency and appropriateness, with validation and content confirmation provided by the respective functional units. This constitutes the initial step within a multi-layered control process, which is coordinated and actively supported by the **Sustainability Officer**. Additional review layers include cross-checks by Controlling, the **Strategy function** and subsequent approval by the **Management Board of LEAG GmbH**.

Information and communication technologies supporting sustainability reporting are based on standard digital collaboration tools and established internal processes. Controlled access to sustainability data ensures that only authorised individuals can view and edit information. Information security is ensured through group-wide IT measures and contractual safeguards with external partners.

Data collection processes, documentation and control mechanisms are being further reviewed and enhanced to strengthen traceability, transparency and reliability of reported information. At present, no dedicated software-based plausibility checks for sustainability reporting data are in place. A review of sustainability reporting processes by Internal Audit has not yet been conducted.

Approach to sustainability



SBM-2

Interests and views of stakeholders

Stakeholder dialogue is an important component of sustainability reporting as it serves as a mechanism for holistic understanding and inclusive decision-making. The Gigawatt division engages with a broad range of internal and external stakeholders as part of its sustainability management, project development and long term value creation. Due to the regional focus and long-term nature of most business activities, stakeholder engagement is organised through established and structured processes that support continuous dialogue at local, regional and national levels.

Stakeholders are identified and prioritised based on their relevance to the division's operations, projects and value chain. Engagement takes place through designated representatives across key functions, including the Management Board of LEAG GmbH and the Managing Directors of the operating companies within the Gigawatt division, project managers, regional managers and employee representatives. Early identification of both existing and new stakeholders affected by projects is an integral part of stakeholder engagement.

Engagement with **investors and lenders** takes place primarily through direct exchanges, supported by publicly available information via media channels, websites and social media presence. **Customers and business partners**, including transmission system operators and other grid-related partners, are engaged through direct contacts, participation in trade fairs and industry events and public communication channels.

Suppliers and contractors are engaged through direct communication and industry events, as well as through established due diligence processes in accordance with the German Supply Chain Due Diligence Act, including access to anonymised whistleblower mechanisms. These engagement formats support transparency, risk identification and responsible supply chain management.

Dialogue with **local communities and municipalities** is conducted through a combination of project related information and dialogue formats, public events and direct contacts. Within these formats, citizens are also provided with opportunities to engage directly with executives, project managers and technical experts. *Further details are provided in the Social section (S3 – Engagement with affected communities).*

Engagement with **government authorities and regulators** takes place through direct contacts as well as through participation in conferences and industry events, site visits and contributions to legislative consultation processes, including positioning through associations. All such activities are conducted within the framework of legal requirements and in compliance

with applicable lobby register obligations. **Non governmental organisations** are engaged mainly through direct exchanges and public communication channels.

Structured engagement with the **media** is maintained through press releases, press conferences, site visits and direct contacts, complemented by digital communication channels. These activities are centrally managed and implemented at LEAG group level by the Corporate Communications function.

Internal stakeholder engagement combines standard communication formats, including intranet, mailings, townhall meetings and surveys. These formats are largely managed and implemented by central functions,

in particular Corporate Communications, Human Resources and Regulatory Management. In addition, communication takes place through line management structures as well as through daily interaction and collaboration within teams, providing more direct and role-specific exchange. *Further details on employee engagement are provided in the Social section (S1 – Own workforce).*

Engagement with **labour and trade unions** is conducted through regular and operational consultations and tariff negotiations. In addition, the division engages with **peers and competitors** through direct contacts, public communication channels and cooperation within industry associations.



Understanding stakeholder interests

Stakeholder interests and views are systematically considered as part of the Gigawatt division's materiality assessment and due diligence processes. These processes aim to identify and prioritise sustainability related IROs that are relevant to the Gigawatt division's strategy, business model and long-term value creation.

In 2025, a stakeholder mapping exercise was conducted to identify the stakeholder groups to be engaged based on defined criteria. Following this, the development of structured questionnaires was coordinated by the Sustainability Officer to validate the outcomes of the DMA and to confirm that the identified material topics reflect the perspectives of key stakeholders. The questionnaire exercise covered **suppliers, financial institutions (e.g., banks and lenders), shareholders, grid infrastructure partners, employee representatives and local communities.** The Supervisory Board also participated, providing its perspective on the status of sustainability in relation to the division's business model and strategy.

The questionnaires were designed to capture stakeholders' views on the Gigawatt division's business activities, sustainability practices and transparency, as well as on how the division's operations affect the environment and society. They covered a broad range of sustainability topics, including climate change, pollution, water use, biodiversity and resource efficiency. The survey also explored social aspects related to the own workforce and workers in the value chain. Governance related questions covered corporate culture, the effectiveness of management systems, whistleblower protection, political engagement, supplier relationships and the prevention of corruption and bribery. In addition, specific questions addressed technology-related developments such as storage, hydrogen solutions and digitalisation, while open questions allowed stakeholders to share additional perspectives on sustainability priorities, communication practices and areas for improvement across the value chain.



IAA Böhlen solar park on a former industrial tailings site, completed in 2023

Stakeholder insights and implications for the strategy and business model

Stakeholder feedback across the consulted stakeholder groups showed strong alignment on the sustainability topics most relevant to the Gigawatt's business model.

Climate change mitigation and adaptation were consistently identified as central, with stakeholders emphasising the management of greenhouse gas (GHG) emissions, the development of renewable, low-carbon and climate-resilient energy solutions and the consideration of transition and physical climate risks in strategic planning, asset development and capital allocation. Environmental topics related to pollution, water use⁶, biodiversity and land use were widely recognised as material, particularly in relation to construction and operational activities, permitting, regulatory compliance and community acceptance. Resource efficiency, waste management and circular economy considerations were highlighted as relevant for cost control, supply chain resilience and risk management.

Social topics, including secure employment, fair wages, social dialogue, skills development and respect for labour rights in the own workforce and value chain, were identified as important for operational stability and long-term transformation.

Governance-related feedback emphasised effective management systems, internal controls, whistleblower mechanisms, transparent political engagement and anti-corruption measures as prerequisites for reliable execution of strategy. Stakeholders also pointed to storage solutions, digitalisation and selected innovation topics as potential enablers of system flexibility, efficiency and future business model development. Overall, the feedback confirmed that sustainability considerations are closely linked to the Gigawatt strategy and business model of the Gigawatt division and are therefore considered in the ongoing review of strategic priorities, operational targets and governance arrangements.



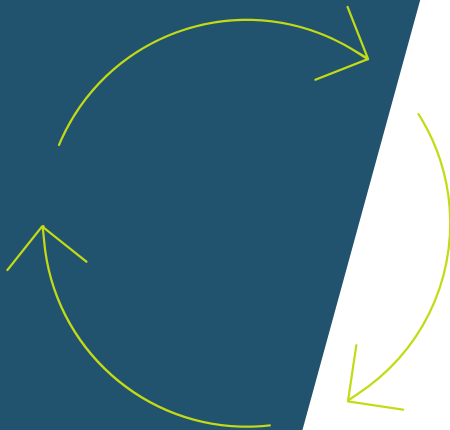
The role of governance bodies

The views and interests of key stakeholders, including workers' representatives, are regularly communicated to the administrative, management and supervisory bodies through structured internal reporting and exchange formats. This includes scheduled briefings and reports prepared by functions engaging with different stakeholder groups as part of their responsibilities, as well as input from the functions responsible for sustainability and compliance. The Management Board considers stakeholder-related input when reviewing strategic decisions and assessing sustainability-related IROs. Where appropriate, relevant stakeholder concerns and material findings are escalated to the Supervisory Board to support its oversight responsibilities and inform governance and strategic decision-making.

⁶ Within the stakeholder consultation, water was identified as a potentially material topic for the Gigawatt division. This assessment is considered plausible given general industry-related risks and local conditions. However, based on the more detailed internal assessment, water use within the division's core processes does not reach the materiality threshold. Further information can be found in the Environmental section of this Report (E-3 Water).

SBM-3

Material impacts, risks and opportunities



Interaction of material IROs with strategy and business model

The DMA was conducted following the ESRS requirements at consolidated level of the Gigawatt division and reflects the division's current business activities. The assessment covers assets and activities at different stages of implementation. This includes wind and photovoltaic assets, a gas-fired power plant and biomass facilities (pellet production) in operation, as well as projects under development and realisation in the areas of renewable energy, battery energy storage systems and hydrogen-ready gas-fired power plants. *Further details on the status of assets and the development of projects are provided in the Environmental section of this Report (E1-5 – Transition actions and implementation roadmap).*

Material impacts and risks are mainly concentrated in the Gigawatt division's own operations, while selected risks and opportunities related to regulatory developments, market conditions and technology availability are assessed across relevant parts of the value chain and considered in strategic decision-making. Strategy and business model are continuously adapted to respond to these material IROs, with a focus on flexibility, security of supply and the gradual expansion of low-carbon energy solutions.

Current financial effects of material risks and opportunities

During the reporting period, material risks and opportunities identified through the DMA had a qualitative impact on the Gigawatt division's financial position, financial performance and cash flows. Current financial effects primarily arise from ongoing investments in renewable energy projects, battery energy storage systems and gas-fired power plant infrastructure, as well as from operating costs associated with energy production, maintenance and supporting functions (e.g. IT, HR, insurance).

Regulatory developments, market volatility in electricity prices and evolving requirements related to decarbonisation influence operating expenses and capital expenditure levels. Investments in renewable energy and flexibility solutions are reflected in capital expenditure and are aligned with the Gigawatt division's strategic objective to strengthen long-term resilience and adaptability of its business model. At the same time, the classification of gas-fired assets within regulatory frameworks supports predictable revenue streams linked to their role in maintaining grid stability and security of supply, partially mitigating short-term market risks. This classification is in place for Leipheim gas-fired power plant and is also targeted for future projects. Biomass activities contribute to diversified revenue sources within the energy portfolio.

Risks of material adjustment in the next reporting period

The Gigawatt division is exposed to a range of material risks that may affect the development, implementation and economic performance of its energy projects and assets in the next reporting period. Political risks include changes or delays in legal and regulatory frameworks, which can impact key project assumptions such as project economics and implementation timelines. This includes, for example, changes to grid fee systems for generation and storage assets, evolving renewable support schemes and delays in power plant legislation. In addition, complex permitting processes may extend project timelines.

Market-related risks primarily relate to price fluctuations for key components and services, which may affect investment costs. Project execution and financing risks include potential disruptions in supply chains, uncertainties in financing conditions and resulting impacts on the implementation of transformation projects.

Environmental and social factors may also influence project development and valuation, including potential impacts on biodiversity associated with wind and photovoltaic installations, as well as evolving requirements for the measurement and reporting of Scope 3 emissions.

Anticipated financial effects over time

In assessing the anticipated financial effects of material risks and opportunities, an evaluation was carried out of the potential magnitude of financial effects associated with specific IROs identified in the DMA. This assessment considered how such risks or opportunities could affect financial position, financial performance and cash flows, as well as access to finance and the cost of capital in the context of the Gigawatt division.

Anticipated financial effects are primarily linked to the ongoing transformation of the energy portfolio, including investments in renewable energy, battery storage systems and gas-fired power plants, as well as exposure to regulatory developments and electricity market volatility. While these factors are expected to influence future capital expenditure, operating costs and cash flow profiles, the precise timing and allocation of effects across specific time horizons are subject to significant uncertainty and depend on external framework conditions and market developments.

Accordingly, anticipated financial effects are not distinguished by predefined short-, medium- or long-term time horizons but are considered in terms of their overall direction and magnitude as part of strategic and financial planning processes.

Resilience of strategy and business model

Strategic resilience is demonstrated through the Gigawatt division's approach to addressing its material impacts and managing risks while capitalising on opportunities, in particular in the renewable energy and flexibility segments. Resilience considerations are embedded in the process of identifying and assessing material IROs, rather than through a separate, time-horizon-based resilience assessment.

Adjustments to the strategy and business model are continuously evaluated, considering regulatory developments, market conditions and technological progress, with a focus on long-term sustainability, system relevance and regulatory compliance. Any changes in material IROs compared to the previous reporting period will be disclosed in future reporting cycles, together with other relevant information.

For the current reporting period, the following sub-topics have been identified as material according to the DMA:

Material topics

E1 – Climate change - Climate change adaptation - Climate change mitigation - Energy	S1 – Own workforce - Working conditions <i>secure employment; working time; adequate wages; freedom of association, the existence of works councils and the information, consultation and participation rights of workers; collective bargaining, including rate of workers covered by collective agreements; work-life balance; health and safety</i> - Equal treatment and opportunities for all <i>gender equality and equal pay for work of equal value; training and skills development; measures against violence and harassment in the workplace; diversity</i>	G1 – Business conduct - Corporate culture - Protection of whistleblowers - Political engagement - Management of relationships with suppliers - Corruption and bribery <i>prevention and detection; incidents</i>
E2 – Pollution Pollution <i>of air, water</i>	S2 – Workers in the value chain - Working conditions <i>working time; health and safety; secure employment</i> - Equal treatment and opportunities for all <i>training and skills development</i> - Other work-related rights <i>child and forced labour</i>	Entity-specific topic Developing storage and hydrogen solutions – innovation (E1)
E4 – Biodiversity and ecosystems - Direct impact drivers of biodiversity loss <i>land-use change; fresh water-use change and sea-use change</i> - Impacts on the state of species <i>species population size</i> - Impacts on the extent and condition of ecosystems <i>soil sealing</i>	S3 – Affected communities - Communities' economic, social and cultural rights <i>land-related impacts</i> - Communities' civil and political rights <i>freedom of expression</i>	
E5 – Circular economy - Resources inflows, including resource use - Waste	S4 – Consumers and end-users Social inclusion of consumers and/or end-users <i>privacy; access to (quality) information; access to products and services</i>	

Table 2: Material topics

IRO-1

Description of the process to identify and assess material impacts, risks and opportunities

For the current reporting period, the DMA was focused on IROs arising mainly from the Gigawatt division's own operations, while also considering potential value chain impacts. Future reporting cycles are expected to progressively expand the scope to cover the upstream and downstream value chain more comprehensively. This reporting period represents the first structured DMA conducted for the Gigawatt division with reference to the ESRS requirements. As such, no comparison to a prior period is provided. Methodological refinements, including expanded value chain coverage, are expected to be reflected in future assessments.

In the initial phase of the DMA, a preliminary list of IROs was compiled, with each IRO being further quantified during the process. The identification and evaluation of these IROs were primarily informed by internal ESG-related data, an assessment of the Gigawatt division's dependence on natural, human and social resources and benchmarking against industry peers. Additionally, the ESG landscape within the relevant sector was mapped using publicly available information.

The compilation process focused on identifying IROs related to the Gigawatt division's activities and evaluating the relevance of each topic according to ESRS guidelines. Each sub-topic was carefully assessed for its connection to operations or business relationships. While some risks and opportunities were directly linked to specific impacts, others were not, illustrating that risks and opportunities can arise across various areas and may not always align with the identified impacts.

In addition to the ESRS 1, AR 16 Application Requirements, entity-specific IROs relevant to the Gigawatt division's activities were also considered. As part of the DMA, a positive actual entity-specific impact

was identified related to the development of storage and hydrogen solutions, which is closely linked to the Gigawatt division's energy generation and flexibility oriented business model and supports the integration of renewable energy.

The DMA under the ESRS requirements consists of the impact materiality and financial materiality. The impact materiality evaluation involved an internal team assessing the impact significance, categorising impacts as positive/negative and actual/potential, while the risks and opportunities assessment was carried out by the internal **Risk Management team**. Relevant ESRS-defined attributes were selected and quantified for each category, ensuring a thorough and consistent assessment of material IROs for the Gigawatt divisions. The assessment of IROs took into account potential effects over time; however, considering the simplified ESRS, a single, overarching assessment horizon was applied instead of defining separate short-, medium- and long-term time horizons. This approach was adopted to ensure consistency with the revised simplified ESRS requirements and to enable a holistic evaluation of IROs, taking into account their potential evolution over time at a broader level.

Impact categories	Assessment attributes	Formulas
Negative actual impact	Scale Scope Irremediability	$(\text{Scale} + \text{Scope} + \text{Irremediability}) \div 3$
Negative potential impact	Scale Scope Irremediability Likelihood	$(\text{Scale} + \text{Scope} + \text{Irremediability} + \text{Likelihood} \times 0.8^7) \div 3.8$
Positive actual impact	Scale Scope	$(\text{Scale} + \text{Scope}) \div 2$
Positive potential impact	Scale Scope Likelihood	$(\text{Scale} + \text{Scope} + \text{Likelihood} \times 0.8^8) \div 2.8$

Table 3: ESRS-defined attributes and materiality calculation formulas

⁷ For negative potential impacts, likelihood was weighted at 0.8 to reflect uncertainty regarding whether the potential impact will materialise, while ensuring that the assessment of severity remains primarily driven by scale, scope and irremediability. This approach prevents potential negative impacts from being assessed as material solely due to a high probability of occurrence and ensures that the magnitude of harm and the difficulty of remediation remain the dominant factors in the materiality evaluation.

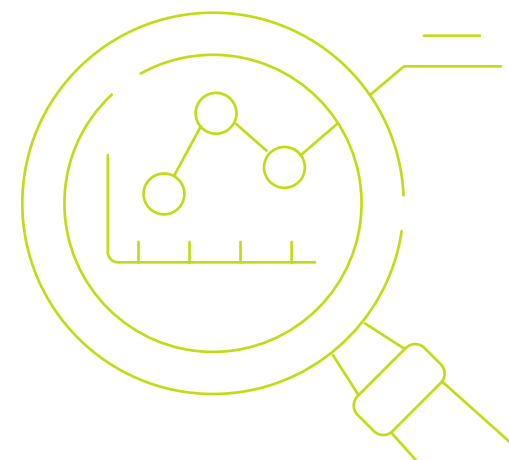
⁸ The likelihood factor for positive potential impacts was weighted at 0.8 to avoid over emphasising probability in the assessment of positive outcomes. This reflects the methodological approach that the materiality of positive impacts should be driven mainly by their potential scale and scope, while likelihood serves as a moderating factor rather than a determining one.

Severity is determined based on factors such as the scale, scope and irremediability of the impact. The materiality assessment of an actual negative impact is based solely on its severity, whereas for potential negative impacts, both severity and likelihood are considered. Areas with a heightened risk of negative impacts were identified by considering the nature of the Gigawatt division's activities, its relevant business relationships and the geographical context in which its operations and supply chain interactions occur. These factors were also considered when assessing the severity and likelihood of impacts, particularly in relation to environmental degradation and effects on people. In the case of positive impacts, materiality is based on the scale and scope of the impact for actual impacts; and the scale, scope and likelihood of the impact for potential impacts, *as presented in Table 3: ESRS-defined attributes and materiality calculation formulas.*

Impacts were evaluated using a five-point scale across all categories, with the interpretation tailored to each assessment attribute. The scale reflects the magnitude of the impact, indicating the severity of negative effects or the significance of positive contributions to people or the environment. A score of 1 represents minimal impact, while 5 denotes a profound or absolute impact. Intermediate levels (2 to 4) capture increasing degrees of intensity, from low to high. For human rights, a score of 5 was automatically assigned in cases where rights were at risk. For impacts on people, the scale reflects the number of individuals adversely affected, while for environmental impacts, it indicates the severity of harm or the extent of the affected geographical area.

The **scope** presents to what extent the impact affects the society or the environment. The assessment distinguishes impact scopes from minimum (affecting individuals, small communities or single sites) to global (impacting multiple countries or entire economies). Environmental impacts range from local ecosystems and towns to entire regions or nations, depending on scale and population affected. Social and governance impacts are evaluated based on how widely they influence internal company structures, supply chains and broader societal groups.

Irremediability assesses the extent to which negative impacts can be reversed, i.e., whether the environment or the situation of affected individuals can be restored to their original state. The evaluation of irremediability considered the feasibility of prevention, mitigation and remediation measures available to the Gigawatt division. Where effective prevention or mitigation measures were deemed to be available and realistically implementable, this was reflected in lower irremediability scores. Conversely, impacts for which remediation was limited, disproportionate or not feasible were assessed as having higher severity. The five-point scale ranges from 1, where remediation is feasible within one year at minimal cost, to 5, where restoration is not possible within ten years or would require disproportionate resources. Intermediate scores reflect increasing timeframes and cost implications associated with potential remediation efforts. This approach supported the prioritisation of impacts by reflecting not only the magnitude of harm, but also the undertaking's capacity to prevent or address adverse outcomes.



Likelihood measures the probability and frequency of an impact occurring. It is assessed on a five-point scale, where 1 indicates a low probability (0–20%) and 5 reflects a near certainty (81–100%). Intermediate ratings correspond to increasing probability ranges, capturing a structured view of potential occurrence from unlikely to highly likely events.

The materiality of the impact was then calculated depending on its category according to the formulas in *Table 3*.

The **impact materiality** was assessed based on predefined criteria, with a significance threshold established at 3.0 for negative impacts and 3.5 for positive impacts. Impacts meeting or exceeding these thresholds were considered material. A comprehensive list of material impacts was then compiled following the assessment.

The **financial materiality of risks and opportunities** was assessed considering their financial impact and likelihood, in line with the company's risk management framework. A five-point scale was used, ranging from 1 (minimal impact) to 5 (critical impact), based on the estimated annual financial damage, measured in million euros, and reflecting the severity of effects on the annual financial statements and, where relevant, on the

company's value. This scale enabled the categorisation of financial impacts, from insignificant (<€0.5 million annually) to crucial (>€500 million annually). The next step involved setting a significance threshold, determined at 2.11 for risks and opportunities based on prior analysis and expert assessment. Risks and opportunities meeting or exceeding this threshold were considered material. A final list of material risks and opportunities was then compiled.

The **final significance of the identified impacts, risks and opportunities** was determined by selecting the highest value across the evaluated time horizons. In the final step of the DMA, the highest value was assigned to topics, sub-topics, and sub-sub-topics, based on the impact and risks and opportunities results, in line with the established thresholds.



DMA stakeholder validation

Following the completion of the DMA, targeted stakeholder engagement was performed to validate the identified IROs and to assess their alignment with stakeholder perspectives. This validation was supported by structured questionnaires developed on the basis of a stakeholder mapping exercise and addressed to key stakeholder groups. *Details on the design, scope and execution of the stakeholder engagement activities and questionnaires are described under the SBM-2 section.*

IRO-2

Disclosure requirements in ESRS covered by the undertaking's sustainability statement

A structured overview of the ESRS Disclosure Requirements considered in the preparation of this sustainability statement – based on the outcome of the materiality assessment – is provided through a comprehensive ESRS index included at the end of this Report.

The ESRS content index serves as navigation tool that reinforces transparency and ensures that the relevance and coverage of each ESG topic are accessible and traceable.

The content index provides a structured overview by

- Listing each reported sustainability disclosure requirement
- Linking the material disclosure requirements to the Gigawatt division report content and headlines
- Identifying the location of corresponding disclosure within the Report

Therefore, this integrated index serves as a central reference point, linking all relevant ESRS components and supporting full traceability across the sustainability disclosures.



GDR-P

Policies adopted to manage material sustainability matters

The policies and internal guidelines presented in this section form an integral part of the LEAG group's overarching governance and control framework. They are designed to manage material actual and potential negative impacts, as well as material risks and opportunities, as identified through the DMA. Collectively, these policies enable a structured, consistent and risk-based approach to sustainability management across environmental, social and governance topics.

Key content, objectives and linkage to material impacts, risks and opportunities

Each policy defines specific objectives, control mechanisms and responsibilities relevant to the sustainability matters it addresses. Environmental-related policies include internal frameworks that define responsibilities, processes and coordination mechanisms for developing and representing the LEAG group's positions on energy, environmental and climate matters, thereby supporting informed decision-making and the effective management of environmental impacts and regulatory requirements. Social policies address workforce-related impacts and risks, including occupational health and safety, employee development, fair working conditions and data protection. Governance policies establish the framework for compliant and ethical business conduct, including anti-corruption, competition law, risk management and internal control systems.

The policies are designed to mitigate material negative impacts (e.g. workplace safety incidents, non-compliance, data breaches), manage material risks (e.g. regulatory, operational and reputational risks) and support opportunities related to operational efficiency, workforce development and effective governance. Where relevant, policies also contribute to the prevention and remediation of adverse impacts through defined procedures (e.g. incident reporting, internal audits, whistleblowing mechanisms).

Scope of application

The scope of the policies varies depending on the subject matter and is defined at policy level. Taken together, the policies cover:

- own operations and workforce across all business units
- contractors and external partners operating on LEAG-controlled sites
- selected upstream and downstream value chain activities, particularly in areas such as business conduct, compliance, procurement-related expectations and risk management.

Geographically, the policies apply to the LEAG group's German operations and, where relevant, to international locations through equivalent or locally adapted frameworks to ensure alignment with applicable legal and regulatory requirements. The management of international entities must report to the Compliance Officer of the LEAG group on a regular basis or in the event of compliance violations, and must establish a functional coordination and reporting line.

Affected stakeholder groups covered by the policies include, where applicable, employees, contractors, business partners and, in specific areas, other stakeholders interacting with the group's operations.

Reference to third-party standards and regulatory frameworks

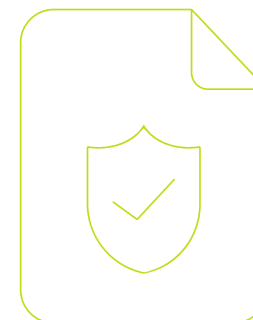
The policy framework incorporates and aligns with applicable legal requirements and recognised external standards and frameworks where relevant. This includes, for example:

- occupational health and safety management aligned with DIN ISO 45001:2018
- compliance with the EU General Data Protection Regulation (GDPR) and national data protection laws
- adherence to applicable European and national regulatory requirements in areas such as anti-corruption, anti-money laundering and competition law

Where policies refer to such standards or frameworks, they support consistent implementation of recognised principles and regulatory compliance across the organisation.

Consideration of stakeholder interests in social policies

Social policies are developed and implemented in line with applicable legal requirements and internal governance processes, taking into account the interests of affected stakeholders, primarily the own workforce. Employee representation structures and relevant internal functions may be involved in the development and review of policies, depending on the topic. These processes support the alignment of policies with workforce needs and regulatory obligations.



Human rights policy and international frameworks

Human rights-related commitments are embedded within the policy framework, in particular through the Code of Conduct and compliance-related policies. These instruments establish expectations for lawful, ethical and responsible behaviour and contribute to safeguarding fundamental rights across the operations and business relationships of the Gigawatt division.

Human rights are addressed through a framework aligned with internationally recognised standards, including the United Nations Guiding Principles on Business and Human Rights. In this context, internationally recognised human rights instruments, including the International Bill of Human Rights, comprising the Universal Declaration of Human Rights and the International Covenants, as well as the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work are implicitly covered and reflected in the Code of Conduct, contractual frameworks and supplier assessments.

The human rights framework applies to the LEAG group's own workforce and, where relevant, extends to workers in the value chain and business partners through the Code of Conduct and related compliance policies. It supports the identification, prevention and mitigation of human rights risks and adverse impacts. Related processes, including grievance mechanisms and policy development, are subject to ongoing enhancement as part of the LEAG group's continuous improvement approach.

Governance and monitoring

LEAG group-level policies are subject to final approval by the Management Board of LEAG GmbH, which has the same composition as the Management Boards of the group's stock corporations Lausitz Energie Bergbau AG and Lausitz Energie Kraftwerke AG, with operational oversight delegated to senior management within the relevant departments. Continuous monitoring is conducted through a combination of internal audits or by separately commissioned third parties, compliance reviews and reporting dashboards, with the specific mechanisms applied varying according to the subject matter of the policy.

Haidemühl solar park
completed in November 2024

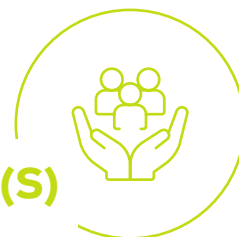


Relevant policies



Environmental (E)

Policy and specifications	Content & objectives	Scope of application	Relevant ESRS link
Energy and Environmental Policy	This policy sets out how the LEAG group develops and coordinates its positions on energy, environmental and climate policy and how these positions are represented to political and regulatory stakeholders. It allocates responsibilities, in particular to Public Affairs and Regional Management, and sets out processes for monitoring the political and regulatory environment, internal coordination and lobbying activities. The guideline is embedded in the broader compliance and conduct framework of the LEAG group.	All business units and operations	ESRS E1 – Climate change



Social (S)

Policy and specifications	Content & objectives	Scope of application	Relevant ESRS link
Group Work Agreement on Employee Development	This document sets out the opportunities for employee development and their perspectives based on the phases of the employee journey, as well as the HR tools integrated into the respective phases. Its aim is to create a positive and appreciative employee experience that meets both the needs of employees and LEAG's goals.	LEAG Renewables GmbH LE Finance GmbH	ESRS S1 – Own workforce
Occupational Health and Safety Management System based on the requirements of DIN ISO⁹ 45001:2018	This document sets out the framework for implementing and managing occupational health and safety based on ISO 45001.	All German locations, international locations have own setup	ESRS S1 – Own workforce

⁹ International Organisation for Standardisation

Policy and specifications	Content & objectives	Scope of application	Relevant ESRS link
Accident Prevention Concept	The document sets out internal rules and procedures for reporting and investigating work-related accidents. It defines accident types and required reports, sets reporting deadlines and tools (such as EPLAS and dedicated forms), assigns responsibilities for investigations and root-cause analysis, regulates communication with external authorities and specifies documentation, follow-up, return-to-work reporting and archiving requirements.	All German locations, international locations have own setup	ESRS S1 – Own workforce
Fire Protection Regulations-Organisational Manual	The document sets out the fire protection regulations for preventing fires and for appropriate behaviour in the event of a fire, with the aim of protecting people and limiting damage to property and the environment. Within LEAG locations, it covers everyone present in buildings and production areas – employees, contractors and visitors – through three parts: Part A for all persons on site, Part B for employees without special fire roles and Part C for employees with special fire protection duties.	All German locations, international locations have own setup	ESRS S1 – Own workforce
Privacy Policy	This policy regulates the legally compliant implementation of the requirements of the European Union General Data Protection Regulation (EU GDPR) and the German Federal Data Protection Act (BDSG). The aim is to ensure that personal data is adequately protected during its processing and thus that the personal rights of the data subjects are not impaired.	All German locations, international locations have own setup	ESRS S1 – Own workforce ESRS G1 – Business conduct
Organisation of Information Directive	This directive regulates the ensuring of information security (IS) and defines the role in the IS organisation, including the descriptions, competences and tasks.	All German locations, international locations have own setup	ESRS S1 – Own workforce
Avoidance of Concealed Temporary Employment and Bogus Self-Employment-Organisational Manual	The document serves to avoid concealed temporary employment and bogus self-employment in the context of concluded contracts for work and self-employment as well as other forms of contract for third-party personnel deployment (e.g. service procurement contract). The aim is to ensure that conduct is consistent with the law.	All German locations, international locations have own setup	ESRS S1 – Own workforce
Reporting Directive	This directive ensures and defines reporting processes and reportable events. The directive defines the specific events that must be reported (such as accidents at work, acute illnesses, fires, explosions or deflagrations, vehicle damage, accidents and notable malfunctions at systems subject to monitoring etc.)	All German locations, international locations have own setup	ESRS S1 – Own workforce
Employment Restrictions and Prohibitions Directive	This directive serves to protect the health of women and their child at work, training and study, regulates compliance with and implementation of legal provisions, employment restrictions and prohibitions for pregnant and breastfeeding women, as well as for adolescents.	All German locations, international locations have own setup	ESRS S1 – Own workforce



Governance (G)

Policy and specifications	Content & objectives	Scope of application	Relevant ESRS link
Code of Conduct	This document sets out certain behavioural requirements, based on the corporate principles and the mission statement of the LEAG group, that must be met in a wide variety of circumstances and contexts. It also emphasizes that each employee is responsible for protecting and enhancing the reputation of the LEAG group.	All business units and operations; also applicable to business partners	ESRS G1 – Business conduct
Compliance Management System (CMS)	This document regulates the structural and procedural organisation of the compliance management system, including the Compliance Committee and Compliance Report. It includes rules on the prevention, investigation and defence against bribery and corruption, the reporting of incidents under the whistleblower system, and the roles and responsibilities of external ombudspersons. It also sets out the rules and procedures for preventing money laundering and ensuring compliance with German anti-money-laundering law.	All German locations, international locations have own setup	ESRS G1 – Business conduct ESRS S1 – Own workforce ESRS S2 – Workers in the value chain
Antitrust and Competition Policy	This policy sets out binding rules to ensure that the company and its staff comply with applicable European and national competition and antitrust laws, preventing unlawful restraints of competition and associated legal or reputational risks.	All German locations, international locations have own setup	ESRS G1 – Business conduct
Powers of Attorney and Signature Authorisations	This document regulates the granting of powers of attorney and of authorisations to sign as well as the way signatures are to be provided in external and internal correspondence.	All German locations, international locations have own setup	ESRS G1 – Business conduct
Tax Management System	The document sets group-wide rules for tax governance and tax compliance to ensure all tax-related activities comply with applicable tax laws.	All German locations, international locations have own setup	ESRS G1 – Business conduct
Rules of Conduct for Information Security	This document defines obligations aimed at protecting the LEAG group and its employees, external partners and customers in terms of information security. It addresses information security issues that are relevant to all employees.	All German locations, international locations have own setup	ESRS G1 – Business conduct

Policy and specifications	Content & objectives	Scope of application	Relevant ESRS link
Payment Transactions Directive	This directive regulates the principles and framework conditions for the uniform approval and execution of payments within the LEAG group as well as for payment transactions carried out for third parties within the framework of service level agreements or similar agreements. Payments within the meaning of the directive are incoming and outgoing means of payment as well as movements of means of payment between bank accounts and cash registers.	All German locations, international locations have own setup	ESRS G1 – Business conduct
Internal Revision	This document defines the mandate, objectives and working principles of the Internal Audit function, which independently assesses and improves risk management, internal control, governance and compliance in line with professional standards and the Code of Conduct. Internal Audit develops and executes a risk-based annual audit plan, performs planned and ad-hoc audits focusing on compliance, process efficiency, internal controls, fraud prevention, risk management and information security, and follows a defined lifecycle from planning and fieldwork through reporting to follow-up on the implementation of agreed measures.	All business units and operations	ESRS G1 – Business conduct
Risk Management Policy	This policy defines the objectives, governance model and process for risk management, ensuring that the management identifies, assesses, aggregates, steers, monitors and reports risks in a structured way to protect the group's going concern and support its strategy. It also includes two annexes specifying the detailed framework for managing market and counterparty risks in power and CO ₂ trading, as well as the "Know Your Customer" process for OTC (Over-the-Counter) and other business partners, thereby extending the scope to trading activities and business partner due diligence.	All German locations, international locations have own setup	ESRS G1 – Business conduct
Reporting Duties Directive	The directive sets out group-wide rules on how to comply with regular internal and external reporting and information obligations. It defines which departments and functions are responsible for preparing, approving, disclosing and archiving various types of reports and information, including finance and controlling, personnel, sustainability, regulatory and statistical reporting, credit and trading contracts, and communications with corporate governance bodies and external stakeholders such as authorities, investors, media and the public. Its purpose is to ensure that all information is disclosed in a lawful, complete, timely and controlled manner, while preventing unauthorised publication of forecasts, insider information, or competitively sensitive data, including in crisis and ad-hoc situations.	All German locations, international locations have own setup	ESRS G1 – Business conduct

Policy and specifications	Content & objectives	Scope of application	Relevant ESRS link
Regulatory Framework Guideline	This guideline supports a court-proof organisation by providing specifications and responsibilities for operational regulation.	All business units and operations involved in processing of regulations	ESRS G1 – Business conduct
Handling of Legal Matters Directive	This directive describes the handling of legal matters such as jurisdiction, procedures and forms. It explains the cooperation of the organisational unit Legal/Insurance with other organisational units.	All German locations, international locations have own setup	ESRS G1 – Business conduct
Membership Directive	This directive regulates the exercise of membership in associations and the guarantee of proper and transparent processing of memberships. It ensures that memberships in work related associations must be compatible with the values and goals of LEAG GmbH and its subsidiaries and have a connection to the respective company.	All business units and operations that exercise memberships and are involved in administrative processing of memberships	ESRS G1 – Business conduct
Corporate Protection Directive	This directive defines the tasks and objectives of corporate security as well as emergency and crisis management of the LEAG Group.	All German locations, international locations have own setup	ESRS G1 – Business conduct

Table 4: Overview on policies and specifications



Night-time transport of wind turbine blades through Cottbus



GDR-A

Actions and resources in relation to material sustainability matters

Emphasis is placed on implementing meaningful and proportionate actions to support sustainability objectives and to manage the material IROs identified through the DMA. In line with the current organisational structure and the diversity of activities within the Gigawatt division, sustainability actions are primarily designed and implemented at operational and company level. This enables a targeted response to specific regulatory, technical and market conditions, while ensuring consistency with the division's overarching strategic direction.

Key actions implemented and planned

Sustainability actions within the Gigawatt division are integrated into day to day business operations and are disclosed within the relevant topical ESRS sections of this Report. There, they are presented in direct connection with the material IROs they address. The actions cover a broad range of topics, including environmental performance, workforce related matters, working conditions, stakeholder engagement, compliance and responsible business conduct.

The actions described in the topical sections are either ongoing or were active during the reporting period and focus on priority areas identified through the DMA. Their scope is topic specific and may relate to particular activities, entities within the Gigawatt division or defined stakeholder groups. Looking ahead, coordination and documentation of sustainability actions are intended to be gradually strengthened, building on existing practices, while reporting on actions within the relevant topical standards will continue in future reporting periods.

Expected outcomes and link to policies

The actions disclosed are expected to contribute to the prevention or mitigation of material negative impacts, the management of material risks, and, where applicable, the achievement of positive outcomes. Each action supports the objectives of the related policies and strategic priorities, as described in the respective topical sections, for example with regard to environmental protection, occupational health and safety, stakeholder engagement and compliance. No division-wide action plans with quantified outcome oriented targets have been established for the current reporting period, except for those disclosed under *E1 Climate change*.

Tracking of implementation and remedy

Responsibility for the implementation and monitoring of sustainability related actions rests with the respective operational and functional managers and is embedded within their management responsibilities and target agreements. Oversight is provided through established governance and control structures, including Sustainability Management and direct supervisory functions. Progress is monitored through metrics, internal reviews and management reporting processes, as described in the GOV-1 chapter of this Report. Where adverse impacts occur, appropriate corrective measures are initiated through established operational and management procedures.

Resources and budget allocation

At division level, no centrally defined or ring-fenced sustainability budget has been established for the implementation of key actions. Financial and non-financial resources are allocated through regular operational and investment planning processes and are therefore managed at company or project level.

Where significant financial or non-financial resources are associated with specific actions – such as capital expenditure for energy infrastructure, operational expenditure for environmental or occupational safety measures, or personnel resources dedicated to sustainability management – this information is disclosed within the relevant topical sections of the Report, where it is decision-useful.

Accordingly, no aggregated sustainability-specific expenditure is disclosed at division level, and the implementation of actions does not depend on specific external preconditions beyond the general regulatory and market framework applicable to the business.



Renewable energy sites under construction: Forst-Briesnig II wind farm and Bohrau solar park

GDR-M

Metrics in relation to material sustainability matters

A structured and transparent approach is taken to disclosing non-financial metrics to ensure a holistic representation of sustainability performance across the Gigawatt division. Reporting aligns with the requirements of the ESRS, integrating relevant and material indicators into each disclosure to demonstrate how key sustainability matters are managed.

To enhance the effectiveness and relevance of disclosures, metrics are selected based on the outcomes of the DMA. This process supports the identification of material IROs and the assignment of appropriate metrics – both qualitative and quantitative – that reflect key environmental, social and governance aspects. The set of metrics includes those defined in the ESRS as well as entity-specific indicators developed internally or derived from sector-specific benchmarks.

Installation of turbine towers at
Forst-Briesnig II wind farm



Methodology, definitions and validation

Disclosed metrics use a consistent methodological approach where possible. Where relevant, detailed explanations of the methodologies and assumptions used are provided, including known limitations related to data quality, measurement boundaries, or estimation techniques. Key performance indicators (KPIs) are collected differently depending on their nature. Financial indicators are reviewed and confirmed by external auditors in accordance with legal requirements. There are also other legal and technical-methodological requirements for determining KPIs, particularly in the areas of emissions and environmental characteristics, as well as personnel-related data collection. The methods used for the calculation, which are based on German law, are legally compliant. Responsibility for ensuring compliance with national calculation requirements for international locations rest with the respective local management.

In some cases, certain KPIs or underlying data are determined and verified by independent third parties, such as laboratories. There are numerous non-financial KPIs that are developed and monitored internally by specialist departments.

Where currency is used as a unit of measure, reporting is conducted in the presentation currency of the consolidated financial statements.

As it is the first year of reporting for the Gigawatt division, no detailed breakdown of changes compared to previous reporting periods is provided for the metrics in the current Report. In tables and data disclosures, "0" indicates a zero value or rounded to zero, "n/a" indicates data not applicable or outside the reporting scope; and "-" indicates that data was not available or not reported.

Continuous improvement and outlook

There is a commitment to further develop the metrics framework and to consider and implement revisions to methods, e.g., for environmental assessments. Furthermore, developments in the revision of the CSRD and the associated standard are crucial for further recording the scope and evidence, should further developments and specifications arise in this regard.



GDR-T

Tracking effectiveness of policies and actions through targets

The need to assess sustainability measures not only from a technical perspective but also at a strategic level has been recognised, with the aim of continuously enhancing the sustainability performance. Strategic topics, including those relevant to the Gigawatt division, are addressed at the level of LEAG GmbH, ensuring alignment across the LEAG group. The development of a dedicated sustainability framework – with defined action areas, concrete measures and measurable objectives – marked an important step in embedding sustainability at the management level. The initial implementation of a DMA further deepened the understanding of how to systematically identify and evaluate IROs. Based on this, further strategic development will follow.



Environmental (E)

Targets and tracking of effectiveness

Within the Gigawatt division, environmental management is primarily implemented through permitting processes, operational controls and monitoring of performance indicators, including data on resource use and emissions. A differentiated approach to targets is applied, reflecting varying levels of materiality, data maturity and relevance at consolidated reporting level.

At the level of the Gigawatt division, for climate change mitigation, measurable outcome-oriented targets are disclosed and are an integral part of the division's strategic transformation. *These targets are implemented through the portfolio build-out and associated investment pathway described in E1-1 Transition plan for climate change mitigation.* Progress towards the transition targets is tracked using portfolio-level metrics and monitoring processes aligned with the capacity pathway and underlying actions set out in that section.

For other environmental topics, including pollution, water, biodiversity and resource use, no consolidated targets are disclosed in this Report. However, internal objectives focus on resource efficiency and optimisation, emissions reduction and the preservation of biodiversity.

Across the Gigawatt division, environmental management is further supported by internal operational targets and controls, aligned with legal requirements, permit conditions, applicable management systems or certification standards. Where deviations from regulatory limits occur, they are addressed through defined corrective measures. In the biomass segment, for example, environmental performance is tracked through topic-specific metrics, such as emissions to air, water discharges, waste generation and further sustainability-related indicators for feedstock sourcing and biomass products, which enable trend analysis and oversight over time. Full data integration for Scandbio AB operations is currently constrained by localised data-collection structures. Environmental performance is managed via a qualitative evaluation framework, ensuring proportionate governance aligned with the entity's operational scale.

This overall approach ensures effective management of material impacts and risks while maintaining proportionality in reporting. As targets at this stage are internally developed and entity-driven, they are managed by senior management and implemented by operational units. Stakeholder involvement in target development currently takes place at an informational level.

Social (S)

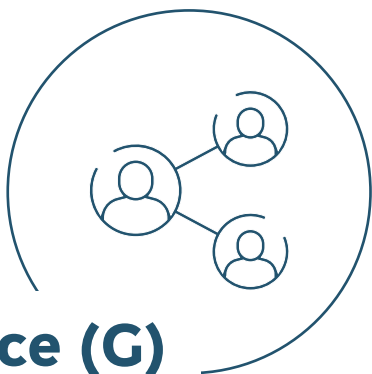


Targets and tracking of effectiveness

The social management approach focuses on maintaining a skilled and motivated workforce, ensuring safe and fair working conditions and fostering constructive relationships with workers in the value chain, affected communities and end users across the LEAG group, including the Gigawatt division.

Quantitative and qualitative targets are defined internally for social topics, particularly in relation to own workforce development, occupational health and safety and contractor safety. Employee representation, co-determination and engagement processes form part of social governance. For stakeholder engagement and responsible communication, no uniform quantitative targets are defined. These areas are managed through principles-based and operational approaches that allow for context-specific responses.

The targets support risk mitigation and long-term organisational resilience but are not disclosed in detail at consolidated reporting level due to their strategic sensitivity. Effectiveness is tracked through a combination of metrics (such as occupational safety indicators), structured dialogue formats, employee and stakeholder feedback mechanisms and regular internal reviews. This approach allows to steer social impacts responsibly within the Gigawatt division, while avoiding disclosure of non-decision-useful information.



Governance (G)

Targets and tracking of effectiveness

Governance-related objectives within the Gigawatt division are aligned with the LEAG group level and focus on sound business conduct, regulatory compliance, transparency and ethical behaviour. Internal targets exist for governance topics such as compliance training coverage, anti-corruption and anti-bribery measures, responsible payment practices and risk-based control activities, supporting the effective implementation and monitoring of related policies and actions. For the Scandbio companies operating in Sweden and Latvia, which are therefore not covered by the German compliance system, governance requirements are implemented at entity level in accordance with applicable legal and regulatory frameworks. Management of international

entities is required to maintain regular reporting to the LEAG group Compliance Officer, including in the event of compliance violations, and to ensure appropriate coordination and reporting lines are in place.

While these targets support effective governance and are actively monitored internally, no specific outcome-oriented governance targets are disclosed externally in this Report. Performance is instead tracked through completion rates of mandatory trainings, incident monitoring, internal controls and oversight by management and governance bodies. This ensures robust governance practices across the division while respecting confidentiality and proportionality.



Environmental

The environmental section of this Report includes five main topics: **climate change, pollution, water, biodiversity and ecosystems and circular economy.**



E1

Climate change

Climate change is a material topic for the Gigawatt division due to its role in electricity generation and energy infrastructure and its strategic focus on renewable energy, flexibility solutions for energy production and storage, as well as low-carbon technologies.

SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the Gigawatt division's commitment to responsible business practices, a DMA was conducted to evaluate the environmental and social implications, potential risks and emerging opportunities related to operations across the portfolio.

As a material issue within the environmental category, climate change includes the following sub-topics:

- Climate change adaptation
- Climate change mitigation
- Energy
- Developing storage and hydrogen solutions - innovation (entity-specific topic)

The description of the DMA is provided in ESRS 2, with additional details included to ensure clarity and comprehensiveness, primarily in SBM-3 and IRO-1.





The DMA identified both positive and negative impacts across climate change mitigation, adaptation and energy use, as well as related risks and opportunities that are closely linked to the Gigawatt division's business models.

Positive impacts primarily arise from the generation of renewable energy and the planned provision of further grid-stabilising flexibility solutions. This includes wind and photovoltaic generation developed and operated by **LEAG Renewables GmbH**, as well as battery energy storage systems and hydrogen-ready power plants planned and realised by **LEAG Clean Power GmbH**. These activities contribute to the decarbonisation of the energy system, support system-level efficiency through improved integration of variable renewables and can enhance the resilience of electricity supply under changing conditions. Additional positive impacts are associated with integrating climate resilience considerations into asset design and operations.

At the same time, the Gigawatt division has negative climate-related impacts through direct and indirect greenhouse gas emissions, linked to its activities across **LEAG Renewables GmbH**, **LEAG Clean Power GmbH** and **LEAG Biomass GmbH**. These emissions arise, among other factors, from fuel consumption where applicable, purchased energy, as well as upstream and downstream value-chain activities associated with transport and construction. In addition, material risks relate to the capital intensity and long investment horizons of energy assets, primarily affecting **LEAG Renewables GmbH** and **LEAG Clean Power GmbH** and, through its financing role, **LE Finance GmbH**. Climate-related physical risks can affect infrastructure and supply chains, including climate sensitive biomass and wood procurement at **LEAG Biomass GmbH**, where droughts, pests and extreme weather events may impact feedstock availability and quality, with indirect financial exposure for **LE Finance GmbH**. Opportunities arise from the deployment of energy-efficient and low-carbon technologies across the Gigawatt division's operations.

These material IROs are considered in strategic and operational decision-making, including investment planning, asset optimisation and the ongoing development of the energy portfolio. They form the basis for the related disclosures in this E1 chapter.

In addition, the material climate related IROs identified for the Gigawatt division are considered within the broader governance framework established by LEAG's **Energy and Environmental Policy Directive**. This directive sets out the internal processes, roles and responsibilities for coordinating LEAG's positioning on energy, environmental and climate policy matters. The directive establishes structured mechanisms for monitoring regulatory developments, coordinating internal input, defining the group's positions on relevant policy matters and ensuring consistent and aligned communication towards political stakeholders. As such, it supports the integration of regulatory and policy developments into internal decision-making processes.

E1-1

Transition plan for climate change mitigation

The climate change mitigation approach within the Gigawatt division is embedded in strategic portfolio development and investment decision-making. It focuses on expanding renewable energy generation and scaling flexibility solutions, including storage and bridging technologies such as hydrogen-ready back-up capacity, to support security of supply as the energy system transitions. In this way, mitigation is operationalised through the systematic build-out of a low-emission energy portfolio, implemented via the division's project pipeline and aligned with its evolving business model in the electricity sector.

By systematically scaling up and integrating renewable and dispatchable generation capacity, the division directly enables and compensates for the reduction and ultimate phase-out of lignite-fired power plants up to 2038 and therefore constitutes the strategic cornerstone of the LEAG group's transformation. The CO₂ reduction targets related to the phase-out of lignite-based power generation, which apply to the LEAG group's Lignite division, remain unchanged; however, they are outside the scope of this Report. As the business model and regulatory context continue to evolve, the Gigawatt division's transition pathway will be further developed across key elements of the value chain, strengthening its operational robustness and bringing together mitigation pathways across business areas.



Wind and solar energy on recultivated post-mining land near Jänschwalde

Baseline (2025)

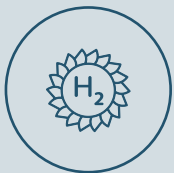
installed / operational
capacity:



Renewables
(wind and photovoltaics):
141 MW



**Battery energy storage
systems:**
0 MW / 0 MWh



Flexible power plants:
300 MW

7 GW

As part of LEAG's transformation, the Gigawatt division pursues the ambition to add 7 GW of newly built capacity across renewables, storage and power plants. For integration into the medium-term planning 2030, the 7-GW ambition is allocated across technology segments:



Renewables
(wind and
photovoltaics):

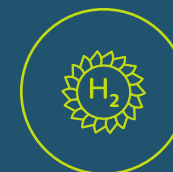
about 1,000 MW
by 2030

**Difference to the
7 GW ambition:**



**Battery energy
storage systems:**

about 4,700 MW
by 2030



Flexible power plants
(incl. hydrogen-ready
development where
applicable):

about 600 MW
by 2030 (subject to the
regulatory and tender
framework)



**Total allocation
by 2030** (medium-term
planning):

about 6,300 MW

Due to timing and regulatory dependency: The flexible power plant component is dependent on the regulatory and tender framework of the German government, which has been subject to delays and remains a key precondition for implementation; additional hydrogen-ready gas capacity is currently anticipated to enter operation from 2031 onwards, subject to the final regulatory framework.

Due to scope: Green heat planning is under development at LEAG group level and is currently not included in the Gigawatt division reporting scope.

The build-out pathway is implemented through a portfolio approach that prioritises cost efficiency, scalability, permitting readiness and grid integration, including the use of existing energy sites with established infrastructure and grid connections. In addition, the expansion of biomass activities with pellet production capacities contributes to the substitution of coal-based energy use by providing sustainable fuels for downstream heating applications.

Overall, the division's mitigation-related actions depend on external assumptions and conditions, with the most material dependencies relating to the regulatory and market environment. Continued progress requires a stable, investment-enabling framework for renewables, including timely decisions on the future support scheme in Germany ahead of 2027, the designation of suitable areas through regional planning and efficient permitting processes.

A further prerequisite is regulatory clarity for hydrogen-ready back-up power plants, including a clear tender design. Following delays to date, timely and non-discriminatory conditions across regions are essential

to safeguard security of supply and support structural development during and beyond the coal phase-out. Predictable rules for flexibility solutions such as large-scale storage are equally important, particularly with regard to grid fees and market design. Further dependencies include the availability and development of gas transport infrastructure that can be used for hydrogen in the future, and sustainable biomass supply based on responsible forestry practices.

In addition, the realisation of transformation-supporting projects is contingent on securing external capital. The companies of the Gigawatt division address these financing-related dependencies through transparent communication, credibility and alignment with long-term value creation as core elements of the financing strategy.

Progress is monitored via project governance and portfolio steering within the companies of the Gigawatt division, complemented by group-level governance mechanisms under LEAG GmbH, with periodic updates integrated into planning and reporting cycles.

Locked-in GHG emissions

Potential locked-in greenhouse gas emissions primarily relate to gas-fired power plants that form part of the existing and planned asset portfolio. These assets contribute to emissions, with the risk increasing if they are operated over extended periods without conversion to low-carbon fuels. This risk is mitigated by limiting their use to back-up purposes, designing new plants to be hydrogen-ready and embedding them in a broader strategy focused on expanding renewable energy generation and storage capacity.

During the reporting period, capital expenditure related to gas-fired power plants was limited to hydrogen-ready assets and to back-up capacity for supply security. The Gigawatt division did not invest in coal or oil-related economic activities.

E1-5

Transition actions and implementation roadmap

The following actions represent the operational backbone of the Gigawatt division's transition pathway and illustrate how mitigation is translated into concrete projects and implementation measures that

- ramp up renewable generation,
- scale flexibility and storage to integrate volatile renewable production,
- prepare dispatchable back-up capacity as hydrogen-ready where relevant for system resilience.

These elements are complemented by operational measures, including efficiency improvements in biomass pellet production and the integration of biodiversity considerations in renewable project development to support permitting outcomes and ensure robust, compliant project implementation.

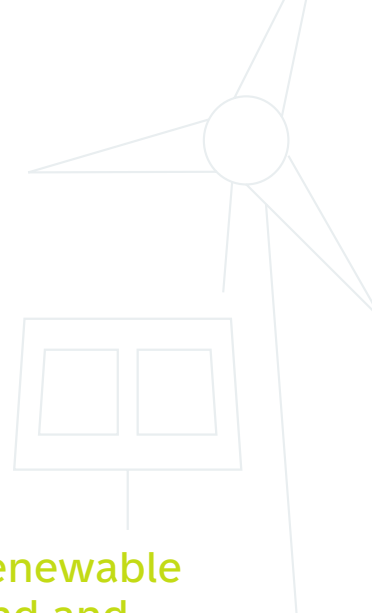
Expansion of renewable generation (wind and photovoltaics)

The renewable energies business under **LEAG Renewables GmbH** focuses on developing a wind and photovoltaic portfolio, primarily on LEAG-owned post-mining land and on third-party land, to diversify the generation portfolio in line with the declining conventional generation of the LEAG group's lignite division.

In 2025, two further ground-mounted photovoltaic plants were commissioned: Haidemühl Solar Park (22 MWp) and Jänschwalde I Landfill Solar Park (31 MWp), complementing existing PV projects such as PV Park IAA Böhlen (17 MWp) and PV Park Kraftwerk Boxberg (25 MWp). In wind, five of the 17 turbines of Forst-Briesnig II commenced operation by year-end; the project totals 105 MW and is among the largest approved onshore wind farms in Germany.

Additional projects under construction in 2025 included Floating PV Cottbuser Ostsee (29 MWp) and PV Energy Park Bohrau Phase 1 (133 MWp, first construction phase). In parallel, permitting procedures under the Federal Immission Control Act were underway for additional wind projects, including Forst-Briesnig III and Kausche. At the end of 2025, the total capacity under active development was approximately 1.5 GW.

In the Czech Republic, four small solar parks are part of the LEAG group. They were acquired in 2023 and have been assigned to **LEAG Renewables GmbH** since 2025. Together, they have a total installed capacity of approximately 16 MW.



Scaling battery storage for flexibility and system integration

Battery energy storage systems (BESS) are essential components for balancing renewable generation and demand through rapid charging and discharging. Within the Gigawatt division, storage projects developed and operated by **LEAG Clean Power GmbH** primarily support the integration of renewables through load shifting. They also provide ancillary services, thereby contributing to grid stability and security of supply, and support the future development of energy and industrial sites.

In 2025, implementation advanced on BigBattery Oberlausitz at the Boxberg site, planned at around 100 MW power and 137 MWh usable storage capacity, with start of operation scheduled for 2026. For the next scaling stage, LEAG Clean Power is preparing and realising further storage projects, including GridBatteries connected to the 110 kV grid and GigaBattery style systems connected to the 380 kV grid. In 2025, EPC contracts were concluded for the first GigaBattery projects in Jänschwalde and Boxberg with a combined storage capacity of 5.6 GWh. The expansion target of 3 GWh of storage capacity set out in the Sustainability Report 2024 will already be exceeded by these two projects. Part of the GigaBattery Boxberg is supported by funding from the European Union's Just Transition Fund (JTF).

Dispatchable back-up capacity and decarbonisation pathways

Gas-fired power plants provide a flexible back-up during periods of low renewable feed-in and can offer a lower-carbon pathway through conversion to clean power solutions. To enable rapid implementation once the political framework is established, **LEAG Clean Power GmbH** has advanced planning for hydrogen-ready capacity.

Partial approvals have been obtained for two planned hydrogen-ready combined cycle gas turbine (CCGT) plants at Schwarze Pumpe and Lippendorf. Commercial operation could commence from 2031 onwards, subject to the regulatory framework and the associated tender procedures under a proposed Electricity Security and Capacity Act (StromVKG). At the Leipheim site, a 300-MW gas turbine power plant has been in operation since 31 July 2023 as a "special grid-related asset" for the transmission system operator. At the same site, a hydrogen-ready gas turbine power plant of around 300 MW is planned with a target start in 2030, likewise contingent on the framework conditions to be set by the German Government.

Projects related to the production, storage and utilisation of green hydrogen are under strategic assessment and will be considered for further development as market conditions evolve, particularly with regard to predictable supply and demand and the availability of supporting infrastructure frameworks. A green hydrogen project currently underway, featuring 1 MW of electrolysis capacity to supply public transport in Cottbus (where LEAG's head office is located), is being proceeded to be operative by the end of 2026.

Biomass platform consolidation and efficiency measures

Following strategic acquisitions, the biomass business consolidated under **LEAG Biomass GmbH** is positioned as one of Europe's leading suppliers of wood pellets and supports the LEAG group's transition with certified biomass products intended to support lower-emission heating pathways under applicable and regulatory frameworks, while associated lifecycle emissions and biodiversity impacts remain important management considerations. The platform combines the production and distribution activities of LEAG Pellets GmbH in Germany and Scandbio AB with pellet plant capacities in Sweden and Latvia.

During 2025, the focus was on consolidating the expanded platform, while maintaining high product quality and sustainability standards. Operational mitigation measures in this segment include improvements in energy efficiency in pellet production and a dedicated target to reduce electricity consumption in operations. While overarching emission reduction targets are not yet defined at segment level, reduction objectives at LEAG Pellets GmbH are partly driven by the implementation of the ISO 50001 energy management system, with a focus on improving energy efficiency and reducing energy intensity.



Rendering of the planned GigaBattery Boxberg at a dismantled former power plant site

Further measures to enhance energy efficiency are currently being implemented, including the modernisation of boiler house infrastructure to increase efficiency at the Wismar site and raise the share of energy generated from biomass. Pellet drying processes are predominantly based on biomass, while certain site-specific exceptions remain, such as at the Schwedt facility, where energy supply is currently based on fossil sources.

A share of renewable electricity is used across the operations; however, a consolidated quantitative breakdown of energy sources is not yet available. At the same time, Scandbio AB has developed a transition plan for climate change, including reduction targets and decarbonisation actions; this plan currently has an internal character, while detailed budgeting and long-term supply strategies are still evolving.

Resources and financing

Mitigation actions are implemented through investment and operational programmes aligned with the GigawattFactory target vision. Significant resources are allocated within the Gigawatt division to advance renewable generation and low-emission flexibility solutions. In 2025, capital expenditures for projects related to stable energy supply amounted to € 169 million, allocated across renewables, storage, back-up power plants and conversion-to-hydrogen activities. For 2026, the capital expenditure (CapEx) plan for **LEAG Renewables GmbH** and **LEAG Clean Power GmbH** amounts to €551 million. Of this, €332 million is allocated to concrete battery storage projects and related grid connections and €123 million to concrete hydrogen-ready projects. The remaining planned CapEx is almost completely allocated to wind energy and photovoltaics.

The finance strategy is guided by the long-term business transformation roadmap and underpins the integration of sustainable solutions across operations. In 2025, the Gigawatt division did not have any new investment projects that were financed externally. To support project execution and financing within the Gigawatt division, **LE Finance GmbH** was established to coordinate and provide external financing instruments and to advance green project development.

CapEx in low-carbon projects		2025
Storage solutions	mil €	10
Green H ₂ (production, storage, usage)	mil €	1
Flexible power plants / H ₂ -ready / power connections	mil €	14
Gas power plants	mil €	0
Wind and Photovoltaic	mil €	144
Total CapEx in low-carbon projects	mil €	169

Table 5: CapEx in low-carbon projects (in mil €)

Monitoring of progress

Progress in climate change mitigation is reflected in the advancement of approved renewable projects, the scaling of battery storage capacity, the design of planned gas-fired assets with provision for future hydrogen conversion and efficiency improvements in biomass operations. Due to the absence of division-wide greenhouse gas reduction targets, progress is currently monitored primarily on a qualitative basis, complemented by project-level milestone tracking (e.g. commissioning, construction start, permitting progress and contracted EPC scope).

E1-2

Identification of climate related risks

Climate-related risks and opportunities are identified and assessed as part of the DMA and integrated risk management processes conducted for the Gigawatt division. The assessment focuses on identifying climate-related factors that may influence the financial position, financial performance and cash flows, considering both physical climate risks and climate-related transition risks and opportunities across the electricity and energy activities.

The material climate-related risks identified for the Gigawatt division are classified as follows:

- Climate-related physical risks, including risks arising from the increasing frequency and severity of extreme weather events. These include potential damage to wind and photovoltaic assets from storms, extreme winds or flooding; reduced productivity of photovoltaic installations due to heat and dust; impacts on battery storage performance due to higher temperatures; and climate-related risks affecting biomass supply, such as drought, pests or storms impacting forestry conditions.
- Climate-related transition risks, including risks related to regulatory and political developments, changes in permitting frameworks and market mechanisms for renewable energy, gas-fired power plants and battery storage, as well as financing risks linked to the capital intensity of long-term energy investments. Additional transition risks relate to uncertain framework conditions for innovative technologies, in particular hydrogen, and to market effects such as price volatility and changing value dynamics resulting from increasing renewable energy penetration.

In addition to the disclosures made under ESRS 2 IRO-1, the Gigawatt division assesses climate-related risks and opportunities using a qualitative, risk-based approach embedded in its DMA and enterprise risk management processes.

The methodology includes:

- the identification of relevant climate-related physical hazards (e.g. extreme weather events, temperature increases, drought, storms) and climate-related transition events and trends (e.g. regulatory changes, energy market developments, technological uncertainty);
- a qualitative screening of the division's key assets and business activities, including wind, photovoltaic, battery storage, biomass and gas-fired power plants, to determine whether they may be exposed to and sensitive to such hazards or transition developments;
- an assessment of the potential financial relevance of identified risks and opportunities by considering their possible effects on financial position, financial performance, cash flows, access to finance and cost of capital.

The assessment does not include detailed quantitative analyses, such as asset-level climate sensitivity modelling, efficiency modelling under extreme temperatures or soil and hydrological modelling. Instead, it focuses on understanding the nature and potential magnitude of climate-related risks and opportunities to support strategic and investment decision-making.

No climate-related scenario analysis were applied as part of the assessment of climate-related risks and opportunities during the reporting period. Accordingly, no disclosures are provided regarding climate scenarios, temperature pathways, associated assumptions or scenario timeframes.

E1-3

Resilience in relation to climate change

The Gigawatt division's strategy and business model are designed to manage and adapt to material climate-related risks primarily through diversification of its energy portfolio, the integration of flexibility solutions and the continuous evaluation of operational and investment decisions. Climate resilience considerations are embedded in the identification and assessment of climate-related risks and opportunities and inform strategic and operational decision-making.

Results of the climate resilience analysis

The assessment of climate resilience builds on the climate-related risks identified in accordance with ESRS E1-2 and was carried out as part of the DMA and risk management processes. The analysis focused on understanding whether the Gigawatt division's current strategy and business model can accommodate identified physical and transition risks without compromising operational continuity or long-term viability.

The results indicate that resilience is primarily supported by:

- a diversification of the energy portfolio, combining renewable electricity generation (wind and photovoltaic), biomass activities, battery energy storage systems and gas-fired power plants designed as hydrogen-ready back-up capacity;
- the integration of dispatchable generation and storage, which mitigates the volatility of renewable energy sources and supports grid stability as well as security of supply;
- the geographic diversification of assets, including non-location-fixed activities such as power trading and different locations of pellet production;
- the use of technical and operational measures to address physical risks, such as plant design based on official meteorological data, heat management systems for battery storage, operational safety modes for wind turbines under extreme wind conditions and insurance coverage against damage caused by extreme weather events;
- geotechnical securing based on site specific soil and ground assessments, tailored foundation design for renewable energy installations on post-mining land and the avoidance of projects in flood-prone areas;
- financial risk mitigation measures, including price hedging to manage exposure to extreme market price peaks.

No climate-related scenario analysis was applied. Accordingly, the assessment does not include scenario-based outcomes but instead reflects the Gigawatt division's current exposure to climate-related risks and the flexibility embedded in its strategy and asset base. *The mitigation and adaptation actions, as described in ESRS E1-5, contribute to strengthening resilience by supporting the ongoing transformation of the energy portfolio.*

Significant areas of uncertainty

Significant uncertainties in the assessment of climate resilience relate to the future development of regulatory and market frameworks, the pace of grid expansion, the availability and cost of new technologies and the long-term impacts of climate change on operational conditions. In addition, detailed quantitative analyses, such as asset-level climate sensitivity modelling or efficiency analyses for photovoltaic performance under sustained high temperatures, have not been undertaken, which limits the precision of resilience assessments.

Capacity to adjust or adapt over time

The Gigawatt division has a demonstrated capacity to adjust and adapt its strategy and business model to climate-related risks over time. This capacity is supported by the planned flexibility of its asset portfolio, the ability to integrate new technologies and storage solutions and the option to repurpose or upgrade sites and assets, including the hydrogen-ready design of planned gas-fired power plants. Ongoing and planned investments in renewable energy, dispatchable capacity, battery storage and efficiency improvements further enhance adaptability.

These measures are complemented by financial risk management practices and are aligned with the climate change mitigation and adaptation actions disclosed in ESRS E1-5. Together, they enable the Gigawatt division to respond to evolving climate-related risks while maintaining system relevance and financial stability, taking into account evolving regulatory frameworks and ongoing policy developments.



E1-7

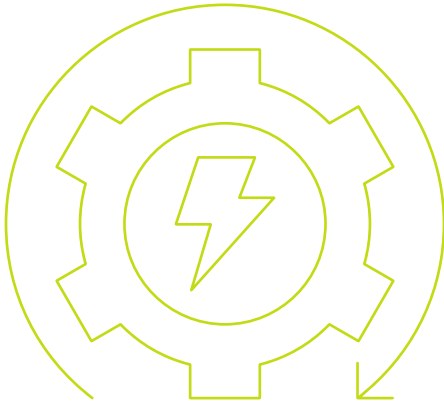
Energy consumption mix

Energy production

In 2025, power production from conventional sources accounted for 2 GWh. Power production from renewable sources was 122 GWh. The installed electricity generation capacity stood at 445 MW, including 145 MW of net installed renewable capacity. The reported figures illustrate the current scale of the Gigawatt division's generation assets and provide additional transparency on the role of renewable energy within its installed base.

Renewable electricity generation from wind and photovoltaic assets is assigned to **LEAG Renewables GmbH**, while biomass-based electricity is generated in two combined heat and power plants operated by LEAG Pellets GmbH, located in Löbau and Oranienbaum. These plants use RED-certified wood chips and are themselves certified as end users under the Renewable Energy Directive. The generated heat is utilised in pellet production, with electricity supplied to the grid.

Concerning heat production, 598,745 GJ (166 GWh) was generated from biomass, representing approximately 99.9 % of the division's total net heat production from both renewable and conventional sources, which amounted to 599,195 (166 GWh) in 2025. The small share of conventional fuels relates to residual fossil oil remaining at one Scandbio site following the transition to biofuels, which is being gradually depleted.



Net installed capacity – electricity		2025
OCGT ¹⁰ and other natural gas	MW	300
Total conventional sources	MW	300
Wind	MW	31
Photovoltaic	MW	110
Hydro	MW	n/a
Biomass	MW	4
Other	MW	n/a
Total renewable sources	MW	145
Total net installed electrical capacity	MW	445

Table 6: Net installed electrical capacity (in MW)

¹⁰ Open cycle gas turbine

Net power production		2025
OCGT & other natural gas	GWh	2
Total conventional sources	GWh	2
Wind	GWh	6
Photovoltaic	GWh	98
Hydro	GWh	n/a
Biomass	GWh	18
Total renewable sources	GWh	122
Total net electricity production	GWh	124

Table 7: Electricity production (in GWh)

Net installed capacity – heat		2025
Biomass	MW	51
Oil	MW	20
Total net installed capacity - heat	MW	71

Table 8: Net installed capacity – Heat (in MW)



Leipheim gas-fired power plant in Bavaria

Net heat production		2025
Oil	GJ	450
Total conventional sources	GJ	450
Biomass	GJ	598,745
Total renewable sources	GJ	598,745
Total net heat production	GJ	599,195

Table 9: Net heat production (in GJ)

Energy consumption

In 2025, total energy consumption related to the Gigawatt division's own operations, combining both conventional and renewable sources, was equal to 732 GWh.

The division reported no consumption of energy from nuclear sources during the reporting period. Energy consumption from fossil fuel sources included natural gas, oil and diesel, with each source linked to a specific subsidiary based on the nature of its activities. Natural gas consumption amounted to 6 GWh at **LEAG Clean Power GmbH** and diesel consumption to 3 GWh at **LEAG Biomass GmbH**. The consumption of purchased fossil energy was 87 GWh.

Energy consumption from renewable sources comprised biomass and purchased energy from renewable sources. Biomass consumption amounted to 520 GWh and was exclusively attributable to **LEAG Biomass GmbH**. The consumption of purchased renewable energy was 115 GWh.

Energy consumption		2025
Total energy consumption from fossil sources		
Lignite	GWh	n/a
Natural gas	GWh	6
Oil	GWh	0
Diesel	GWh	3
Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	GWh	87
Co-combustion	GWh	n/a
Total energy consumption from fossil sources	GWh	97
Renewable sources		
Wind	GWh	0
Photovoltaic	GWh	0
Biomass	GWh	520
Consumption of purchased or acquired electricity, heat, steam, or cooling from renewable sources	GWh	115
Total energy consumption from renewable sources	GWh	635
Total energy consumption from fossil and renewable sources	GWh	732

Table 10: Energy consumption (in GWh)

The Gigawatt division's energy intensity ratio, which equals total energy consumption per net revenue, constituted 3.3 GWh/million € in 2025. Given the division's role as an energy producer, this indicator is primarily relevant within the same sector and offers limited comparability across other industries.

Energy intensity		2025
Total energy consumed	GWh	732
Renewable sources in total energy consumption	%	87
Conventional sources in total energy consumption	%	13
Energy intensity (GWh/net revenues)	GWh/mil €	3.3

Table 11: Energy intensity ratio (in GWh)

Methodology and data quality

Energy consumption is reported as final energy consumption and is expressed in GWh (1 GWh = 1,000 MWh). Heat production is disclosed in GJ in line with internal operational reporting and is converted into GWh for consistency in aggregated energy disclosures (1 GWh = 3,600 GJ). The calculation avoids double counting, ensuring that energy generated and subsequently consumed onsite is recorded only once, and distinguishes between renewable and non-renewable energy sources based on available supplier information and operational records. Where relevant, the classification of purchased energy is based on contractual information and reflects a conservative approach where the renewable share cannot be clearly substantiated.

The disclosed metrics are based on internal operational data collected at entity and asset level, including fuel consumption, purchased energy and production records. The metrics are intended to reflect the energy profile of the Gigawatt division's own operations and provide context for the current stage of its development towards a renewable and flexible asset portfolio. As this is the first year of reporting for the Gigawatt division in its current scope, no detailed comparison with previous reporting periods is provided in this section.

E1-8

Metrics related to climate change

GHG emissions – gross Scopes 1, 2, 3 and total GHG emissions

The Gigawatt division determines the greenhouse gas emissions with reference to the standards of the GHG Protocol as follows:

- direct CO₂ emissions (emissions from power plant operations and fuel combustion in other company-owned or controlled sources) in Scope 1
- indirect CO₂ emissions (emissions due to energy purchases of electricity) in Scope 2
- indirect CO₂ emissions (emissions across the value chain, including upstream and downstream activities) in Scope 3

Scope 1 greenhouse gas emissions of the Gigawatt division arise predominantly in two operating companies. At **LEAG Clean Power GmbH**, which focuses on secure power supply and grid stability, Scope 1 emissions currently originate from the Leipheim gas-fired power plant, which is operated as a grid-related resource for the transmission system operator. At **LEAG Biomass GmbH**, a leading producer of wood pellets with assets in Germany, Sweden and Latvia, Scope 1 emissions result mainly from fuels used to generate process heat and drying energy in pellet manufacturing, as well as from company-owned vehicles, mobile machinery, site heating and emergency generators. Other activities within the Gigawatt division are largely based on renewable electricity and therefore contribute only marginally to Scope 1 emissions.

For the purposes of this disclosure, gross Scope 1 greenhouse gas emissions reflect direct emissions from own operations within the applied reporting boundary. Emission sources within the Gigawatt division's 2025 reporting boundary include installations subject to the EU Emissions Trading System (EU ETS) at **LEAG Clean Power GmbH** and **LEAG Biomass GmbH**.

Scope 2 greenhouse gas emissions from purchased electricity and heat are incurred across all subsidiaries of the Gigawatt division. These emissions arise from the electricity required to operate production facilities, administrative buildings and site infrastructure, as well as from externally supplied district heating where used. Within the division, Scope 2 emissions are particularly relevant for **LEAG Biomass GmbH**, whose pellet and biomass production sites in Germany, Sweden and Latvia rely on significant amounts of electricity to power milling, pressing, conveying, drying auxiliaries and other process equipment. While all the other companies within the Gigawatt division also consume grid electricity for their operations, their Scope 2 contributions are comparatively smaller due to less energy intensive processes.

Scope 3 greenhouse gas emissions of the Gigawatt division arise across the value chain and involve several operating companies. The main contributions come from:

- purchased goods and services
- capital goods
- fuel- and energy-related activities in the biomass sector, not included in Scope 1 or 2
- upstream and downstream transportation and distribution
- waste generated in operations
- employee commuting
- use of sold products linked to **LEAG Biomass GmbH**
- fuel- and energy-related activities.

Information for Scope 3 greenhouse gas emissions in the Gigawatt division is mainly based on financial and activity data extracted from SAP reports provided by the relevant **Purchase Departments**. Waste-related data for **LEAG Clean Power GmbH** is sourced by the responsible **Waste Officers** referring to gas power plant Leipheim. Additional inputs, such as use of sold products, employee numbers and commuting distances, and the value and types of final products are collected from the respective operational units across the division.

GHG emissions (Scope 1, 2, 3)		2025
Direct GHG emissions (Scope 1)	t CO ₂ eq	3,417
Indirect GHG emissions (Scope 2 – location-based)	t CO ₂ eq	50,812
Indirect GHG emissions (Scope 2 – market-based)	t CO ₂ eq	110,237
Indirect GHG emissions (Scope 3)	t CO ₂ eq	145,498

Table 12: GHG emissions

Use of wood-processing residues for pellet production in Schwedt





The Gigawatt division reported **Scope 1** emissions of 3,417 t CO₂eq in 2025, representing 2% of the total reported GHG footprint on a location-based basis and 1% on a market-based basis. **Scope 2** emissions amounted to 50,812 t CO₂eq on a location-based basis and 110,237 t CO₂eq on a market-based basis, representing 25% and 43% of the total reported GHG footprint, respectively. **Scope 3** emissions totalled 145,498 t CO₂eq, representing 73% of the total reported GHG footprint on a location-based basis and 56% on a market-based basis.

Other Scope 3 categories were assessed but are currently not material or not relevant to the Gigawatt division's activities.

Biogenic CO₂ emissions from the combustion of biomass are excluded from Scope 1 totals and reported separately as a memo item with reference to the provisions of the GHG Protocol. These emissions are considered part of the natural carbon cycle and are therefore not included in total greenhouse gas emissions. Outside-of-scope emissions related to Scope 1 were calculated with 186,058 t CO₂eq.

Biogenic CO₂ emissions from the use of sold wood pellets are not included in the Scope 1-2 GHG inventory and are reported separately as additional information. The biogenic CO₂ emissions associated with the use of sold products during the reporting period amount to 1,172,188 t CO₂eq.

Significant Scope 3 GHG emissions by category		2025
C1 Purchased goods and services	t CO ₂ eq	60,665
C2 Capital goods	t CO ₂ eq	32,115
C3 Fuel- and energy-related activities	t CO ₂ eq	2,759
C4 & C9 Upstream and downstream transportation and distribution	t CO ₂ eq	11,037
C5 Waste generated in operations	t CO ₂ eq	163
C7 Employee commuting	t CO ₂ eq	244
C11 Use of sold products	t CO ₂ eq	38,515
Total Scope 3 emissions	t CO₂eq	145,498

Table 13: Significant Scope 3 GHG emissions by category

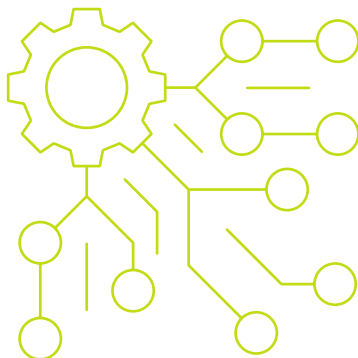
Methodology and data quality

Greenhouse gas emissions are reported in **metric tonnes of CO₂ equivalent (t CO₂eq)** and are determined with reference to the provisions of the **GHG Protocol Corporate Accounting and Reporting Standard**. The GHG inventory covers the Gigawatt division's own operations within the applied reporting boundary and includes Scope 1, Scope 2 and Scope 3 emissions where relevant. Scope 2 emissions are calculated using both **location-based and market-based approaches**, while Scope 3 emissions are primarily based on **spend-based methods**, depending on data availability.

The calculation is based on internal operational, purchasing and energy data collected across the division. **Emission factors are predominantly derived from the DEFRA database, CLIMATIQUE, German Environment Agency or Greenhouse Gas Protocol**, ensuring a consistent and harmonised approach across Scope 1, Scope 2 and Scope 3 calculations. Where direct activity data is not available, **proxy data and estimation methods** are applied, in particular for Scope 3 categories.

The reported emissions reflect **gross emissions** and do not include removals, carbon credits or emission allowances. Direct **biogenic CO₂ emissions** from biomass combustion are disclosed separately and excluded from Scope 1, Scope 2 and Scope 3 totals. Where non-CO₂ greenhouse gases are relevant, they are converted to CO₂eq using the **Global Warming Potential values applied in the underlying emission factor datasets**.

As this is the first year of reporting for the Gigawatt division in its current scope, **no detailed comparison with prior reporting periods is provided in this section**. The undertaking applies a stepwise approach to improving data quality and completeness over time, particularly for Scope 3 categories where estimates and indirect sources remain relevant.



Scope 2 methodology

For the calculation of Scope 2 emissions within the Gigawatt division, both location-based and market-based approaches are applied. On a location-based basis, regional differentiation is used to reflect specific electricity market conditions. For the Swedish and Latvian sites of **LEAG Biomass GmbH**, location-based emission factors derived from the Nordic production mix, including imports and exports, are used to provide a realistic representation of the carbon intensity associated with the electricity used in pellet production. For the German sites, emission factors published by the European Environment Agency or the German Environment Agency are applied, which are based on domestic generation and therefore exclude cross border electricity flows. This approach is consistent with the division's intention to avoid distorting effects from imported nuclear power or coal-based electricity from neighbouring countries, which could otherwise significantly influence the apparent footprint of the German operations. Market-based Scope 2 emissions are calculated and reported in parallel, based on the contractual instruments and supplier specific information available for the respective sites.

Scope 3 category methodology

Scope 3 greenhouse gas emissions from the value chain of the Gigawatt division are calculated spend-based and are therefore estimates. In line with the undertaking's screening of value chain emissions, the following Scope 3 categories were identified as significant for the Gigawatt division in 2025:

C1 Purchased goods and services:

Emissions from purchased goods and services are calculated by applying the relevant emission factor to the financial value in euro of each applicable operational expenditure (OpEx) subcategory.

C2 Capital goods:

Emissions from capital goods are calculated by applying the relevant emission factor to the financial value in euro of each applicable CapEx subcategory.

C3 Fuel and energy-related emissions not included in Scope 1 or 2:

Emissions in this category are determined by multiplying direct fuel consumption by the emission factor assigned to each specific fuel type.

C4 & C9 Upstream and downstream transportation and distribution:

This category covers emissions from purchased transportation and distribution of products (excluding fuel and energy products) occurring before the production process, in vehicles and facilities not owned or operated by the companies under the Gigawatt division. It includes both inbound and outbound logistics. Emissions are calculated by multiplying the financial value in euro of the relevant transport modes (e.g., road, rail, water transport and other logistics) by the corresponding emission factors.

C5 Waste generated in operations:

Emissions from waste generated in operations are calculated by multiplying the quantity of waste by the emission factor corresponding to each waste type. Scandbio AB and the location Oranienbaum have been excluded from Scope 3 category 5 calculation and are not included in the reported emissions for this category.

C7 Employee commuting:

Emissions from employee commuting are determined by multiplying the number of employees by their average daily round-trip commuting distance and then applying the emission factor corresponding to the relevant mode of transport and fuel type.

C11 Use of sold products:

Emissions from the use of sold products are calculated by multiplying the value of the final products in euro by spend-based emission factors selected according to the specific product type. This category relates mainly to wood pellets.

E2

Pollution

The Gigawatt division is committed to systematically identifying pollution-related risks and minimising environmental impacts in line with regulatory requirements and stakeholder expectations. These risks are addressed through environmental management practices, emission control technologies and structured coordination with relevant authorities to ensure compliance and reduce impacts on ecosystems and local communities.

SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the DMA outlined in the section on material IROs, pollution was identified as a material environmental topic, covering the following sub-topics:

- Pollution of air (including dust emissions)
- Pollution of water

By contrast, pollution of soil and impacts related to microplastics are currently not considered material, reflecting the nature of the division's activities and the limited relevance of these aspects within its operational context. In addition, pollution related to substances of concern and substances of very high concern was assessed as part of the DMA but was not identified as a material matter for the Gigawatt division, as their use is limited and primarily contained within controlled systems. Associated potential impacts and risks are insignificant and adequately mitigated through existing operational, contractual and environmental management practices.

The description of the DMA is provided in ESRS 2, with additional details included to ensure clarity and comprehensiveness, primarily in SBM-3 and IRO-1.



E2-2

Actions related to pollution

Pollution related impacts and risks across the Gigawatt division are addressed through a combination of technical measures, operational controls and certified environmental management systems.

The Gigawatt division is associated with pollution related risks across its operations. **LEAG Biomass GmbH** represents the primary source of potential air and water emissions, mainly through dust, particulates, volatile organic compounds (VOCs), process water and surface runoff associated with biomass processing, storage and handling. At **LEAG Clean Power GmbH**, pollution-related risks are limited in comparison and arise from the Leipheim gas-fired power plant, as well as minor water-related aspects linked to operational discharges.

Risks may result in potential fines, remediation obligations, increased operational costs, reputational impacts and potential constraints on stakeholder trust. They are considered in strategic and operational decision-making, including plant design, project planning and environmental management practices.

They are managed within the framework of applicable environmental legislation and permitting requirements. Operational activities are subject to regulatory approval processes, which define binding environmental standards, emission limits and monitoring obligations. Compliance with these requirements ensures that pollution-related impacts are systematically controlled and mitigated at site level.

Actions are implemented across the different business areas, taking into account their specific operational characteristics. In the biomass segment continuous industrial processes are in place. Pollution control measures are implemented across pellet plants in Germany, Sweden and Latvia to ensure comparable performance across the expanded biomass portfolio. Emission data and related performance indicators are monitored and recorded at plant level. Technical pollution control measures are implemented and managed at the level of individual sites, reflecting local operational conditions and regulatory requirements.

At Scandbio AB, these include wet electrostatic filters at Ulricehamn and Forsnäs and a wet filter at Norberg. In addition, ongoing optimisation measures are implemented at the Malmbäck facility to further reduce emission volumes and pollutant concentration in flue gases. In German pellet plants, different filter technologies are also implemented on a site-specific basis. Smaller filters are usually bag filters at all plants. In addition, the biomass CHP (Combined Heat and Power) emissions in Löbau and Oranienbaum are filtered through wet electrostatic filters. In Wismar four old boilers were taken out of service and will be replaced by two boilers with less capacity and better efficiency which will more than halve pollution from own heat production. In addition, and unlike the old boilers, the SNCR (Selective Non-Catalytic Reduction) technology and bag filters ensure lower emissions. All these measures are based on established industry practices and scientific evidence and are designed to ensure effective and reliable emission reduction over the long term.

The Scandbio AB production sites operate under **ISO 14001 certified environmental management systems**, which provide a structured framework for identifying, monitoring and mitigating air and water related emissions, including dust, particulate matter and relevant water discharges. These systems support compliance with environmental permits and continuous improvement of pollution controls across pellet production, storage and handling activities.

In addition, the majority of the division's pellet production sites are subject to independent **SBP (Sustainable Biomass Program)** audits, including SBP Surveillance Audit Reports (SAR) on energy and carbon data, which verify the collection, communication and traceability of energy- and emissions-related data. These audits support transparent monitoring of pollution relevant parameters and provide external assurance on environmental performance.

At Scandbio's production sites in Sweden and Latvia, the use of 100% green electricity further reduces indirect pollution intensity associated with pellet production, supporting the division's broader pollution prevention objectives.

Overall, the biomass segment applies efficient and environmentally sound technologies to support pollution prevention and continuous improvement across its operations. Water-related aspects are not considered a focus topic, as overall water use is low and site-specific measures are in place for wastewater treatment and stormwater management.

For renewable energy activities at **LEAG Renewables GmbH**, pollution-related aspects are primarily limited to temporary effects during construction activities. Based on current project experience, no material emissions such as noise or dust have been identified that would cause disturbance to nearby communities. The construction of photovoltaic and wind assets involves the use of hazardous substances in market-standard quantities of fuel and oil as part of construction activities or for generators. These materials are handled by contracted companies in accordance with applicable permitting and contractual arrangements. Beyond this, no comprehensive or centralised information on additional hazardous substances is available at entity level.

In the context of pollution aspects related to operation and asset management, **LEAG Renewables GmbH** uses certain hazardous substances primarily within encapsulated electrotechnical systems. These include transformer oil and sulfur hexafluoride (SF₆) gas in switchgear, as well as gear oil in wind turbines. These substances are contained within closed systems and are necessary for the functioning and reliability of electrical and mechanical components. Overall, pollution related impacts are not considered highly material in the context of the construction, operation or asset management phases of LEAG Renewables' renewable energy projects. Potential installation-specific impacts, such as shadow flicker, aviation warning lighting and noise emissions of wind energy plants, are assessed as part of the permitting process in accordance with the German Federal Immission Control Act (BImSchG) and further regulation, ensuring compliance with applicable legal thresholds.

At **LEAG Clean Power GmbH**, pollution-related measures are primarily associated with the operation of the Leipheim gas-fired power plant. Environmental management tasks, including permitting processes, compliance reporting and environmental officer functions, are carried out by Lausitz Energie Kraftwerke AG under a dedicated service agreement within the LEAG group. The plant operates under a certified ISO 14001 environmental management system, with certification valid until October 2027. Air emissions are monitored through continuous measurements supplemented by periodic measurements conducted by accredited institutes. Monitoring results are subject to systematic evaluation against regulatory limit values and are reported to competent authorities in accordance with legal requirements. Water-related aspects are limited to indirect discharge of sanitary wastewater and small volumes of process water. Potentially oil-contaminated surface water is treated via oil separation systems. During the reporting period, all defined quantity and quality requirements were met and no releases of hazardous substances occurred. Waste generated during operations is disposed of in accordance with applicable regulatory requirements.

Beyond operational activities, pollution-related aspects at **LEAG Clean Power GmbH** also arise in connection with the construction of grid-supporting and flexible generation assets. A significant share of these projects is planned on industrially pre-developed land associated with existing energy and industrial sites, thereby limiting additional land-use impacts. For battery energy storage systems, safety considerations are integrated already at the design and permitting stage. This includes enclosed system configurations with

integrated monitoring, fire detection, ventilation and thermal management systems, as well as emergency response and spill containment procedures. Critical substances such as electrolytes and cooling agents are handled in accordance with established hazardous substance management protocols. Compliance with all legal and internal requirements is monitored.

During the construction of storage and turbine-related infrastructure, temporary environmental impacts, such as noise and dust, may occur. These are systematically managed through permit-based monitoring requirements and mitigation measures applicable during construction and commissioning.

All installations comply with legally defined permit thresholds for emissions, including noise and dust, ensuring that impacts remain within regulated limits and do not result in disturbance to surrounding communities.

E2-4

Metrics related to dust and other emissions

Air pollutants relevant for the Gigawatt division arise primarily from biomass processing activities and, to a lesser extent, from gas-fired power generation, depending on the specific operational context.

Within the biomass segment, air pollutants such as dust, NOx and CO, as well as particulate matter and volatile organic compounds (VOCs), may occur along the pellet production process, including raw material handling, processing, drying, pelletising, cooling, storage and logistics. *Air emissions are monitored and controlled in accordance with applicable regulatory requirements, as described in the E2-2 section.*

The following table presents emissions of key air pollutants during energy and pellet production for the reporting period, based on site-level data collection across the Gigawatt division. Greenhouse gas emissions

(CO₂) are disclosed separately under climate-related metrics (E1) and are presented here for completeness of operational activity, but are not considered air pollutants for the purposes of this disclosure. Fossil-based CO₂ emissions result from oil and diesel used for drying process in biomass business and from gas-fired power plant Leipheim. Biogenic CO₂ emissions result from biomass used in heating processes during pellet production, where pellets are predominantly produced from wood-processing by-products. CO₂ emissions shown in the table do cover fleet park emissions shown in Scope 1 calculation. Temporary dust emissions associated with construction activities are addressed in the qualitative pollution narrative above.

Significant air pollution during energy production		2025
SO ₂ (sulphur dioxide) emissions	tonnes	0.1
NO _x (nitrogen oxides) emissions	tonnes	131.7
Dust emissions	tonnes	133.0
CO (carbon monoxide) emissions	tonnes	389.6
NO ₂ (nitrogen dioxide) emissions	tonnes	0
NO ₂ emissions	t CO ₂ eq	0
Total significant air emissions	tonnes	654,4
CO ₂ (carbon dioxide) emissions – fossil	tonnes	2,518.0
CO ₂ emissions – biogenic	tonnes	186,058.0
Total significant air emissions (incl. CO₂)	tonnes	189,230.4

Table 14: Significant air pollution during energy production

Emissions to water

Pollutant emissions to water are primarily addressed through operational controls, wastewater treatment and permitting requirements, as described in the E3 section. At the current stage, no consolidated quantitative metrics are disclosed for pollutant emissions to water at division level, as such emissions are monitored and reported at site level in accordance with regulatory obligations.

Environmental incidents

During the reporting period, no significant environmental incidents resulting in material additional releases of pollutants were identified.

Methodology and data quality

Air emission data are reported in tonnes and are based on measurements and calculations performed at plant level through environmental experts. Monitoring approaches follow applicable regulatory standards, including continuous measurement and calculation-based estimation methods where appropriate.

At the current stage:

- data is primarily aggregated for air pollutant emissions;
- emissions data are collected at site level and consolidated for reporting purposes.

The Gigawatt division applies a stepwise approach to further improving emissions data coverage and consistency, in line with regulatory developments and internal data availability.

E3

Water

Although water-related aspects were assessed as part of the DMA, no material IROs have been identified in connection with the business model of the Gigawatt division.

Potential water-related risks were considered in the assessment, particularly in terms of discharges associated with biomass and flexible power generation, however these are effectively managed through established practices such as strategic planning, site design, permitting requirements and environmental management measures. As a result, these do not constitute significant impacts or material risks or opportunities at division level.

Water management is nevertheless embedded within the operational processes of the Gigawatt division and addressed across technologies based on their respective interaction profiles. In biomass operations, water use is linked to processing activities such as drying and wastewater handling, generally at low to moderate levels.

In renewable technologies, water plays a limited operational role: wind energy does not rely on water during operation, and water use in the production of wind assets is not considered a significant driver. Within the division's own activities, water use is primarily associated with one-off construction activities (e.g. concrete use). For photovoltaic modules, water use occurs primarily in the upstream manufacturing phase,

particularly in solar cell production, while for battery technologies, water-related impacts are mainly associated with raw material extraction (e.g. lithium mining in water scarce regions) rather than the division's core activities. These value chain aspects were considered as part of the DMA; however, the extent of associated IROs was assessed as limited. In addition, the availability of robust and reliable quantitative data to measure and monitor such upstream and downstream impacts is currently constrained, and therefore these aspects are not comprehensively quantified within the scope of this Report, which focuses primarily on IROs that can be supported by measurable metrics and available data.

Actions connected to water-related aspects follow the mitigation hierarchy, focusing on avoidance through appropriate design and containment, reduction through efficient water systems and reuse where feasible, and site-specific restoration measures where relevant. These actions are primarily implemented through operational controls, permitting requirements and site-level practices, rather than a standardised group-wide framework.

In the biomass segment, environmental management practices provide an additional layer of governance, with approaches reflecting site-specific conditions and regulatory requirements. These systems include procedures for managing process water and surface runoff, supporting compliance with discharge permits and preventing unintended contamination through structured monitoring and corrective actions. Process water from pellet production is collected, treated and discharged in line with regulatory requirements. Rainwater management systems at storage and handling areas control runoff via sealed surfaces, drainage infrastructure and separation of clean and potentially contaminated flows.

Site-specific implementations vary; for example, wastewater at the Schwedt site is treated externally via the PCK Raffinerie GmbH sewer system, whereas at other sites rainwater is partly managed through infiltration. Also at Scandbio AB, wastewater management reflects site-specific conditions: process water is analysed by an external laboratory for defined parameters prior to discharge; at Ulricehamn, it is subject to local pre-treatment before being transferred to municipal wastewater treatment facilities, while at Norberg it is directed directly to municipal systems, where it is treated and reused; stormwater is managed through site-adapted solutions. Across these operations, water consumption remains low and is not considered a significant environmental aspect.

At **LEAG Renewables GmbH**, water-related actions reflect the low operational water profile, with limited use primarily for photovoltaic panel cleaning, supported by water-efficient practices integrated into maintenance planning. At **LEAG Clean Power GmbH**, water management distinguishes between groundwater protection during construction and operational management at gas-fired plants, where cooling water withdrawals and discharges are regulated through permits, including temperature and quality controls, and supported by monitoring systems. For electrolysis activities, the current scale of planned operations results in negligible water scarcity impacts, and no material risks have been identified.

Across the Gigawatt division, water-related considerations are integrated into site design, operational planning and project development. Findings from water risk assessments inform permitting, infrastructure design, operational controls and emergency preparedness. Accordingly measures are targeted rather than part of a division-wide water management concept, and quantitative targets are defined selectively where relevant. However, beyond these measures, no additional division-wide water management concept has been identified, and quantitative water targets are not consistently defined across all entities.

While water is not considered a material topic for the Gigawatt division – primarily because relevant impacts are concentrated in the upstream or downstream value chain rather than in direct operations – it remains subject to ongoing monitoring. Entities including



LEAG Biomass GmbH, LEAG Clean Power GmbH and LEAG Renewables GmbH maintain processes to manage water-related aspects as part of their broader environmental management practices.

For transparency, this report provides this concise overview of water management practices to give context on existing controls and actions. However, given the non-materiality of the topic, the related disclosures do not follow the full set of requirements defined under the ESRS.

E4

Biodiversity and ecosystems

The Gigawatt division's activities interact with biodiversity and ecosystems primarily through land use and site-specific development. While renewable, storage and power plant projects are largely implemented on previously used or industrially pre-developed land, the biomass segment is more directly linked to the use of biological resources and associated ecosystem dependencies. These factors shape the division's interactions with biodiversity and ecosystems and are primarily governed by regulatory requirements and permitting processes, supported by close coordination with local stakeholders.



SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the DMA outlined in the section on material impacts, risks and opportunities, biodiversity and ecosystems have been identified as a material topic, covering the following sub-topics:

- Land-use change, fresh water-use change
- Species population size
- Soil sealing
- Impacts and dependencies on ecosystem services

The description of the DMA is provided in ESRS 2, with additional details included to ensure clarity and comprehensiveness, primarily in SBM-3 and IRO-1.

The assessment identified both positive and negative biodiversity-related impacts, as well as associated risks, that are closely linked to land use, soil sealing and ecosystem service dependencies across the Gigawatt division's business model.

Positive impacts are associated with the development of renewable energy projects on post-mining land that is subject to mandatory recultivation following lignite extraction. These areas are restored to versatile landscapes through comprehensive recultivation measures carried out by the LEAG group's Lignite division. Wind and photovoltaic projects of **LEAG Renewables GmbH** are developed in alignment with this process and can contribute to ongoing soil development, biodiversity monitoring and enabling multi-use applications (e.g. wind and agriculture), thereby potentially supporting local ecosystem development. In addition, this approach reduces the need for additional greenfield development, which also applies to **LEAG Clean Power GmbH's** project development at existing energy and industrial sites.

At the same time, despite the use of previously used or recultivated land, the development, construction and operation of renewable, storage, power generation and biomass-related assets may give rise to negative biodiversity-related impacts. These include land-use change, habitat disturbance and soil sealing, which can fragment habitats, affect local fauna and flora, alter ecosystem services and locally reduce soil permeability

and ecological functions due to foundations, access roads and other sealed surfaces. In addition, biomass sourcing and processing within **LEAG Biomass GmbH's** value chains may be associated with land-use pressures, potential deforestation and habitat impacts if not carefully managed.

Material risks include increased project development and mitigation costs especially for the renewables segment due to requirements to protect species and habitats under environmental and nature conservation regulations, as well as higher operational costs for the biomass segment arising from its strong dependence on ecosystem services and sustainably sourced biomass.

These material biodiversity and ecosystem-related IROs are considered in site selection, project design and permitting, as well as land use and biodiversity management measures, and form the basis for the related disclosures in this E4 chapter.

E4-1

Transition plan and consideration of biodiversity in strategy and business model

Strategic integration of biodiversity and ecosystems

As described in *SBM 1 – Strategy, business model and value chain*, the Gigawatt division is at the centre of the LEAG group's transformation from coal-based activities towards renewable energy generation, grid supporting flexible assets and sustainable biomass products. This transformation entails changes in land use, asset structure and value chain dependencies, which are linked to biodiversity and ecosystem considerations.

The Gigawatt division does not currently operate under a standalone biodiversity and ecosystems transition plan. Instead, biodiversity-related aspects are addressed within the broader corporate transformation strategy, sustainability framework and governance system. These elements are reflected in existing policies, processes and disclosures, including sustainability reporting.

Contribution to the Kunming – Montreal Global Biodiversity Framework

The evolution of the Gigawatt division's business model and land-use strategy includes elements that are reflected in the objectives of the Kunming – Montreal Global Biodiversity Framework (GBF), although these are not pursued through dedicated biodiversity-specific targets at the current stage of transformation. A central and verifiable element is the systematic redevelopment of post-mining and other previously disturbed land for wind, photovoltaic, storage and grid-supporting infrastructure.

As documented in *SBM 1* and reflected in the 2025 project pipeline and commissioning activities (see also E1-5), new energy assets are predominantly developed on rehabilitated mining land or brownfield sites. This siting approach reduces additional greenfield land take, limits new habitat loss and links energy system transformation with managed land reuse and recultivation processes in former mining regions.

In this context, these practices are broadly aligned with selected objectives of the GBF, in particular those related to limiting further ecosystem degradation and supporting the sustainable use of land, without being directly driven by the framework.



Key features of the biodiversity-related approach

Within the broader transformation framework, biodiversity and ecosystem aspects are addressed through the following key features:

- **Land-use approach:**

The development of renewable and flexible generation assets is largely focused on previously used or recultivated land as well as existing energy and industrial sites, which influences the extent and nature of biodiversity impacts.

- **Permitting-driven integration:**

Biodiversity and ecosystem considerations are primarily addressed through environmental impact assessments and permitting procedures, which define binding requirements for project design, implementation and operation, and are reflected in project timelines and cost planning.

- **Project-level implementation:**

Measures are applied at project level based on site-specific conditions and regulatory obligations, rather than through overarching strategic biodiversity targets.

- **Differentiation by business activity:**

The approach reflects the differing interaction profiles across activities, distinguishing between land-use-related impacts from energy infrastructure and ecosystem service dependencies in the biomass value chain.

- **Integration into existing governance:**

Biodiversity aspects are embedded within existing environmental, sustainability and sourcing frameworks, rather than managed through a standalone governance structure.

Entity specific integration

Biodiversity and ecosystem considerations are integrated into the business models of the Gigawatt division's entities in line with their distinct activity profiles. *The described approach is implemented through entity specific measures and controls as further detailed under E4-3.*



LEAG Renewables GmbH

integrates biodiversity considerations primarily through project siting and development on rehabilitated mining land. Permitting outcomes influence project design, timelines and cost planning.



LEAG Clean Power GmbH

addresses biodiversity aspects mainly in the context of site selection and land use at existing industrial or energy sites, with comparatively limited additional land-use change.



LEAG Biomass GmbH's

business model is linked to forest ecosystems through its reliance on biomass feedstock, with biodiversity-related risks addressed through sourcing requirements, compliance-based controls and a raw material mix prioritising wood processing residues.

Evolution of the transition approach

As the Gigawatt division continues to expand renewable generation capacity, battery storage and hydrogen-ready flexible assets, biodiversity and ecosystem considerations are expected to play an increasingly relevant role in planning and portfolio development. Building on land reuse practices, permitting driven safeguards and certified sourcing frameworks, the division has initiated a broader realignment of its sustainability strategy beyond 2025. This is expected to further clarify biodiversity-related priorities and governance as regulatory requirements, stakeholder expectations and international biodiversity policy frameworks, including the GBF, continue to evolve.

Solar park on recultivated post-mining land near Boxberg



E4-3

Actions related to biodiversity

Biodiversity and ecosystem-related impacts, risks and dependencies within the Gigawatt division are managed through operational measures that reflect the differing interaction profiles of renewable energy development, storage, dispatchable infrastructure and biomass activities. These measures focus on land uses, habitat impacts and ecosystem service dependencies and implement the approach *described under E4-1*.

Within the biomass segment, where dependencies on forest ecosystems are structurally most pronounced, biodiversity-related risks along the value chain are addressed through the application of internationally recognised certification and verification frameworks. Pellet production and sourcing activities at Scandbio AB, Scandbio Latvia and LEAG Pellets GmbH are covered by **FSC (Forest Stewardship Council) and PEFC (Programme for the Endorsement of Forest Certification) Chain of Custody and Controlled Wood certifications**, as well as **SBP certification schemes**. Together, these frameworks ensure traceability, legality and responsible sourcing and help prevent sourcing from highly biodiverse or protected areas. In addition, Supply Base Reports prepared under the SBP framework are used to assess biodiversity-

land-use- and ecosystem-related risks at site and supplier level within the biomass supply base. These reports provide a basis for identifying and mitigating potential biodiversity impacts associated with biomass sourcing and for managing the dependency on forest ecosystem services. Compliance with the sustainability requirements of the EU Renewable Energy Directive (EU RED), as confirmed through formal commitment declarations and certification under recognised schemes, further ensures that biomass is not sourced from old growth forests, protected heathlands, wetlands or other highly biodiverse ecosystems.

The sourcing mix of **LEAG Biomass GmbH** includes both by-products of the wood processing industry and, depending on the site, a limited share of low-grade

roundwood¹¹. The use of by-products from sawmill processes enables the conversion of wood industry residues into a valuable fuel, contributing to the efficient utilisation of secondary raw materials in pellet production. Bark generated through processing is either reused internally in production processes or sold externally as fuel. The core risks related to deforestation are primarily associated with upstream value chain activities, as the sourcing and origin of wood inputs represent the main potential exposure area, particularly with respect to how raw materials are procured and verified. Beyond certification-based sourcing requirements and material input management, no additional specific biodiversity strategies, targets or transition plans have been set for **LEAG Biomass GmbH** at the current stage.

For activities at **LEAG Renewables GmbH**, biodiversity actions focus on managing land-use change and habitat disturbance associated with wind and photovoltaic projects. Renewable projects are predominantly developed on post-mining land, reducing additional greenfield land take and pressure on intact ecosystems. Project layouts, foundations and access infrastructure are designed to limit soil sealing

and permanent land-use change where technically feasible. As part of permitting procedures, impacts related to land use, habitats and protected species are assessed and addressed in project planning and execution, for example through consideration of breeding periods. Where impacts cannot be avoided, mitigation and compensation measures required under environmental and nature conservation legislation are implemented, including habitat compensation, species protection measures and ecological enhancement actions. Biodiversity monitoring is conducted during construction and early operation where required by permits to support compliance and adaptive management.

At **LEAG Clean Power GmbH**, biodiversity-related actions focus on managing site-specific impacts associated with grid-supporting and flexible generation infrastructure, including battery energy storage systems and gas-fired power plants. During planning and construction, measures are implemented, where applicable, to minimise land use and habitat disturbance. This includes optimising the layout and energy density of battery storage systems to reduce the overall spatial footprint and limit soil

sealing, as well as aligning infrastructure with existing industrial or energy sites where feasible. Site-specific environmental protection measures are applied in accordance with permitting requirements to manage impacts primarily associated with land-use change and construction activities. Compensatory or enhancement measures, such as habitat compensation, planting, or ecological restoration, are implemented accordingly, rather than as a standard practice across all projects. Environmental impacts related to the extraction and processing of battery raw materials are recognised as occurring upstream in the value chain and are currently not directly addressed within LEAG Clean Power's biodiversity-related measures.

Across the LEAG Gigawatt division, biodiversity and ecosystem considerations are embedded into project execution, permitting compliance and sourcing practices. Identified risks inform mitigation planning, compensatory measures and implementation decisions. Together, these operational actions provide the practical implementation basis for the biodiversity-related transition approach *described under E4-1*, even in the absence of group-wide quantitative biodiversity targets.

¹¹ The low-grade roundwood used is sourced from PEFC Controlled Sources and is therefore demonstrably traceable to legal and controlled origins. A significant share is additionally 100% PEFC- or FSC-certified. No tropical wood is used.

E4-5

Metrics related to biodiversity

The Gigawatt division currently discloses a limited set of metrics related to biodiversity and ecosystems, reflecting the early stage of development of biodiversity-related data collection.

Locations and biodiversity-sensitive areas

Biodiversity-related impacts arise primarily in former mining regions in Germany, where renewable energy assets are developed on recultivated land, and within biomass sourcing regions in the value chain linked to forest ecosystems. At this stage, biodiversity-related data is generally assessed at project and site level and is not centrally tracked or disclosed. Where relevant, biodiversity considerations in such areas are addressed through permitting procedures and certification frameworks as described in previous sections.

Metrics related to biodiversity and ecosystems change

Biodiversity-related metrics are generally derived from operational data, permitting documentation and certification schemes, and are primarily available at project level. At present, these data are not systematically aggregated across the division and may rely on qualitative assessments or proxy indicators. Baseline values, trend data and monitoring frequency are not defined at aggregated level. The division acknowledges the need to develop a biodiversity metrics framework over time, considering evolving regulatory requirements and data availability, without committing to specific timelines or additional indicators at this stage.



Drivers of biodiversity and ecosystem change

The main drivers of biodiversity-related impacts correspond to land-use change and soil sealing from infrastructure development, as well as biomass sourcing and associated land-use pressures in forest ecosystems. Monitoring of these drivers currently takes place through project development, permitting processes and certification schemes. Quantitative metrics, such as total land occupation or sealed surface area, are not yet consolidated at division level.

Ecosystem condition and species

Impacts on ecosystems and species are assessed on a site-specific basis through environmental impact assessments. While mitigation and compensation measures are implemented where required, aggregated quantitative indicators on ecosystem condition, affected or restored areas, or species populations are not currently reported at division level.

Ecosystem services and dependencies

Selected indicators are used to reflect the dependency on ecosystem services, including:

- 100% of biomass was sourced from certified sources. Volume of wood as raw material purchased amounted to 1,345,480 tonnes which provides basis for assessing biodiversity exposure across sourcing regions, land use and supplier practice.
- About 560 hectares of post-mining, mining-related and landfill land form the basis for all wind and photovoltaic-projects currently under construction or in operation.

These indicators provide a proxy for the division's dependency on ecosystem services, reflecting both the reliance on forest ecosystems through biomass sourcing, including the application of certification-based controls, and land-use dynamics associated with project development sites.

100% of biomass

was sourced from certified sources.

E5

Resource use and circular economy

The Gigawatt division's business model relies on significant inflows of raw materials for the construction, operation and maintenance of its renewable, flexible generation and biomass assets, which creates dependencies on primary and critical resources and drives waste and end-of-life management challenges. At the same time, the division is increasingly applying circular economy principles by promoting material efficiency, reuse, recycling of construction and operational waste and the recovery of by-products, with the aim of reducing resource consumption, waste volumes and exposure to raw material price volatility.

SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the DMA outlined in the section on material impacts, risks and opportunities, the Gigawatt division identified the following sub-topics related to E5 resource use and circular economy as material:

- Resource inflows and use
- Waste management

The description of the DMA is provided in ESRS 2, with additional details included to ensure clarity and comprehensiveness, primarily in SBM-3 and IRO-1.

The assessment identified both positive and negative impacts, as well as associated risks, arising from the Gigawatt division's activities and business model. These are linked in particular to the construction, operation and maintenance of renewable energy assets at **LEAG Renewables GmbH**, flexible generation and storage assets at **LEAG Clean Power GmbH**, and biomass production and processing at **LEAG Biomass GmbH**, all of which rely directly or indirectly on inflows of raw materials and generate waste and by-product streams.

Positive impacts stem from the increasing application of circular economy principles, including the reuse of materials, the recycling of construction and operational waste, and the recovery and utilisation of by-products. Within the biomass segment, circularity is inherently embedded in the production process. **LEAG Biomass GmbH** relies significantly on secondary raw materials such as sawdust and other residues from the wood processing industry. Production residues are reused internally or marketed externally, contributing to efficient material utilisation and reduced waste generation. At **LEAG Renewables GmbH**, a conscious approach to lifecycle management of renewable energy equipment, including planning for the reuse, dismantling and recycling of photovoltaic and wind turbine components, supports a more circular and resource-efficient asset portfolio.

Circular economy aspects for **LEAG Renewables GmbH** and **LEAG Clean Power GmbH** are largely linked to the construction, maintenance and decommissioning phases of their respective energy assets and are predominantly managed through external contractors and regulatory requirements. In the upstream value chain, the production of technical equipment for renewable assets and energy infrastructure requires significant volumes of primary raw materials (e.g. metals, minerals, composites, concrete and cabling) and may also involve critical raw materials. Without effective reuse and recycling, this may result in resource inefficiencies, increased waste generation, including hazardous waste streams, and continued dependence on virgin materials. At the same time, the proper end-of-life management of components contributes to keeping materials in circulation, thereby supporting the availability of secondary materials and helping to stabilise market conditions for critical inputs.

These underlying patterns of resource use also translate into material economic risks. Tightening supply conditions, price volatility and increasing regulatory requirements for waste handling and recycling may lead to higher costs and operational complexity. These risks are particularly relevant where alternative materials or circular solutions are not yet fully established or are controlled outside the division's direct operational scope. As a result, resource-related considerations are increasingly reflected in procurement processes, contractual arrangements and long-term asset planning. In the biomass segment, this is particularly linked to the availability, quality and traceability of wood-based feedstock, including the use of secondary raw materials and production residues, which supports efficient material utilisation and reduces waste streams.

E5-2

Actions related to resource use and circular economy

Actions reflect the different material profiles and lifecycle characteristics of renewable energy assets, flexible generation infrastructure and biomass operations.

Circular economy aspects are currently addressed primarily through compliance-driven processes, contractual arrangements with specialised service providers and established operational practices rather than through a dedicated, overarching circular economy strategy.

Within the biomass segment under **LEAG Biomass GmbH**, resource use and circularity considerations are primarily linked to the sourcing, traceability and processing of wood-based feedstock. Operations depend on continuous inflows of wood-based raw materials, including by-products from the wood processing industry as well as a limited share of low-grade roundwood at LEAG Pellets GmbH.

Circularity is reflected in the utilisation of secondary raw materials and the handling of production-related residues. A significant proportion of input materials consists of wood processing by-products, such as sawdust and other residues, which are converted into pellet products. Where bark is generated during production, it is sold externally as fuel or for composting, supporting the utilisation of available material streams and limiting the need for disposal.

These operations are characterised by continuous material inflows and outputs, resulting in a relatively high level of inherent circularity within the production process. At the same time, dependency on biomass feedstock creates exposure to raw material availability, quality variations, price developments and ecosystem constraints, which are considered in sourcing, procurement and production planning to enhance the resilience of biomass operations.

Certification frameworks contribute to the traceability and responsible sourcing of biomass. Schemes such as the **SBP**, which is implemented at the majority of pellet production sites, support feedstock verification, chain of custody and data collection, thereby supporting the conversion of production residues into valuable pellets products, reducing material losses, minimising waste streams and promoting a more circular use of biomass resources. Similarly, **ENplus certification** for pellet production, storage and distribution, applied at the majority of pellet production sites, supports consistent product quality, optimised handling and reduced material losses along the value chain. In addition, ISO 9001 certified quality management systems at Scandbio AB sites contribute to improved production controls, more efficient use of raw materials and reduced waste generation.

These frameworks support resource efficiency, documentation of material flows and verification of sustainability-related data within the biomass segment. Circularity is primarily embedded in production processes, in particular through the utilisation of by-products and certification-based sourcing approaches. While no standalone circular economy strategy has been defined, these practices contribute to efficient resource use and the reduction of material losses across operations.

For renewable energy activities at **LEAG Renewables GmbH**, circular economy-related aspects are primarily addressed through contractual arrangements and applicable waste and take-back obligations. Dismantling is considered as part of project planning and is already regarded with project setups. Where required by permits, dismantling guarantees have also been provided. For PV modules, manufacturers partially cover the responsibility for dismantling.

At the end of their service life, solar modules and other electrical components are disposed by suppliers through the PV Cycle system. Where substructures remain economically viable, they are reused; otherwise, materials are returned to the raw materials market for recycling. Similar processes apply to wind turbines. For the dismantling of wind turbines, the reuse of concrete tower elements, foundations and access road materials within the LEAG group is envisaged, with further processing by SERO Lausitz into secondary raw materials.

Across construction and operation phases, waste management and material handling are contractually defined in agreements with EPC contractors, civil engineering firms and service providers. These agreements include requirements for proper collection, treatment and disposal of waste streams in accordance with applicable regulations, generally prioritising reuse and recycling where feasible. At present, no comprehensive or centrally documented waste management processes or contractual provisions specifying detailed recycling or recovery requirements are available at entity level.

At **LEAG Clean Power GmbH**, battery handling follows applicable EU and national regulatory frameworks. Provisions are in place for the safe collection, storage and handover of spent batteries to authorised treatment or recycling partners. Where technically and economically feasible, reuse or second-life options for battery systems with reduced capacity are considered prior to recycling.

Decommissioning of assets, including gas-fired power plants, battery systems and associated infrastructure, is integrated into lifecycle management and planned in line with regulatory requirements. Given the development stage of many assets, dismantling, material separation and subsequent recovery or disposal through licensed waste management channels are primarily considered in project planning and long-term asset management, and are not yet operationally significant. Beyond end-of-life considerations, waste

handling and disposal requirements are also embedded across earlier lifecycle phases through contracts with construction and service providers, ensuring that waste streams arising from construction, operation and maintenance are subject to appropriate oversight and regulatory compliance.

Across the Gigawatt division, circular economy activities are largely embedded in compliance-based processes, structured outsourcing arrangements and lifecycle management practices, complemented in parts of the business by process-inherent circularity and certification-based approaches. At the same time, the division recognises the importance of keeping materials in circulation to conserve natural resources and support the long-term availability of critical components and technologies. This perspective is reflected in procurement and contractual requirements, certified frameworks and cooperation with external partners, and remains an area of continued development.

E5-4, E5-5

Metrics related to resource use and circular economy

The Gigawatt division's resource use and circular economy profile is reflected in both the material inflows required for its operations and the waste and by-product streams generated across its activities. These flows are closely linked to the business model described above and to the application of circular economy principles at different stages of the asset lifecycle.

(E5-4)

Resource inflows

The division relies on a range of material inputs associated with the construction, operation and maintenance of renewable energy, flexible generation and biomass assets. These include both biological materials, primarily wood-based biomass feedstock, and technical materials, such as glass, aluminium, steel, concrete, cabling and components used in renewable energy and storage infrastructure.

Within the biomass segment, a significant share of input materials consists of secondary raw materials, including by-products from the wood processing industry such as sawdust and other residues. These materials are used as feedstock for pellet production,

reflecting the inherent circularity of biomass operations and supporting the efficient use of available material streams. In contrast, renewable energy and storage activities are currently more reliant on primary raw materials, including critical materials used in batteries and electrical components, with circularity considerations primarily addressed through lifecycle and end-of-life management approaches.

At the current stage, quantitative data on the total weight of material inputs, their breakdown by material category and the share of secondary materials is not yet consolidated at division level. Resource inflow considerations are therefore primarily reflected through operational practices and procurement strategies rather than through aggregated metrics.

(E5-5)

Resource outflows – Products

Circular economy considerations for key products and assets are primarily addressed through lifecycle management and regulatory frameworks, rather than through product-level design indicators. This includes, for example, manufacturer take-back obligations for photovoltaic modules and regulatory requirements for battery systems at end of life.

While these mechanisms support the recovery and recycling of materials over the asset lifecycle, the undertaking does not currently disclose structured information on the durability, repairability or recyclability rates of key products and associated components.

(E5-5)

Resource outflows – Waste

Waste generation

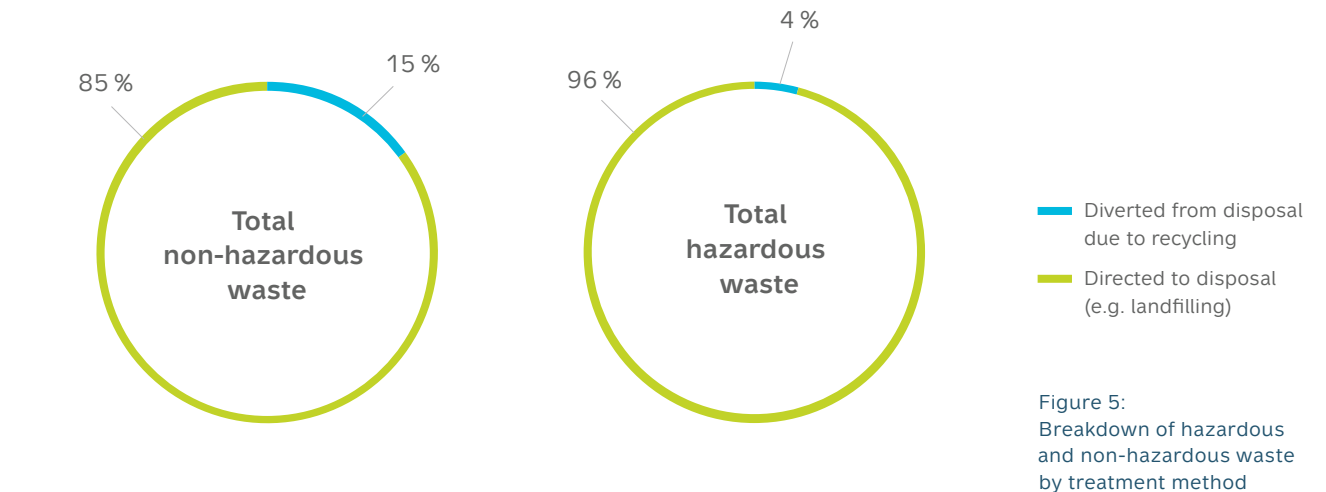
In 2025, waste generated across the Gigawatt division amounted to 3,388 tonnes, of which the majority consisted of non-hazardous waste (88%; 2,967 tonnes), while hazardous waste accounted for 12% (421 tonnes). No radioactive waste was generated within the reporting scope.

Waste generation is primarily linked to construction, operation and maintenance activities across renewable energy, flexible generation and biomass operations, consistent with the material sub-topics identified in the DMA.

Waste treatment and circularity

Waste treatment reflects both the application of circular economy practices and the technical limitations associated with specific waste streams.

Most waste was directed to disposal routes, primarily through landfilling, with smaller volumes incinerated. Overall, disposal accounted for 86% of total waste generated (2,922 tonnes), while 14% (466 tonnes) was recycled.



Recycling was primarily associated with non-hazardous waste (448 tonnes; 13% of total waste generated), while only a small share of hazardous waste was recovered (18 tonnes; 0.5%). Hazardous waste was largely disposed of (403 tonnes; 12% of total waste generated), with non-hazardous waste also predominantly directed to disposal (2,519 tonnes; 74%).

From a waste type perspective, 15% of non-hazardous waste and 4% of hazardous waste were diverted from disposal due to recycling.

The share of “directed to disposal by other disposal operations (recycling)” is around 0.2% and is therefore rounded to zero.

These patterns reflect the nature of construction materials, infrastructure components and biomass-related residues, as well as current limitations in recycling options for certain material streams. In particular, biomass-related residues and packaging materials may constrain the extent to which waste can be diverted from disposal.

Methodology and data quality

Resource use and waste-related metrics are based on operational data collected across entities and projects, primarily covering construction, operation and maintenance activities. While these data provide a basis for understanding material flows and waste generation patterns, they are not yet fully standardised or aggregated across the division, particularly with regard to resource inflows.

Where relevant, the division relies on contractual arrangements, certification frameworks and regulatory reporting to support the tracking and management of material flows and waste. At the current stage, baseline values, trend information and detailed breakdowns by material category or waste stream are not systematically disclosed.

The Gigawatt division applies a stepwise approach to developing its resource use and circular economy metrics, with a focus on improving data availability, consistency and transparency over time, in line with evolving regulatory requirements and internal processes.

Waste production		2025
Non-hazardous waste	tonnes	2,967
Hazardous waste	tonnes	421
Total amount of radioactive waste	tonnes	n/a
Total waste production	tonnes	3,388

Table 15: Waste production

Waste disposal		2025
Hazardous waste diverted from disposal		
Diverted from disposal due to recycling	tonnes	17
Diverted from disposal due to preparation for reuse	tonnes	0
Non-hazardous waste diverted from disposal		
Diverted from disposal due to recycling	tonnes	443
Diverted from disposal due to preparation for reuse	tonnes	0
Hazardous waste directed to disposal		
Directed to disposal by incineration	tonnes	0
Directed to disposal by landfilling	tonnes	403
Directed to disposal by other disposal operations (recycling)	tonnes	1
Non-hazardous waste directed to disposal		
Directed to disposal by incineration	tonnes	49
Directed to disposal by landfilling	tonnes	2,470
Directed to disposal by other disposal operations (recycling)	tonnes	5
Non-recycled waste		
Non-recycled waste	tonnes	2,922
Total waste generated	tonnes	3,388

Table 16: Waste disposal

Social

The social section of this Report includes four main topics: **own workforce, workers in the value chain, affected communities and consumers** and **end-users**.



S1

Own workforce

The companies within the Gigawatt division are committed to providing their employees with long-term prospects, development opportunities, as well as a safe and healthy working environment in which they can continue to thrive.



SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the commitment to responsible business practices, a DMA has been performed to identify and assess potential risks and emerging opportunities related to the Gigawatt division's workforce and related social aspects.

Based on the DMA described in the section on material IROs, the following sub-topics related to own workforce are considered material for the Gigawatt division:

- Secure employment
- Working time
- Adequate wages
- Freedom of association
- The existence of works councils and the information, consultation and participation rights of workers
- Collective bargaining, including rate of workers covered by collective agreements
- Work-life balance
- Health and safety
- Gender equality and equal pay for work of equal value
- Training and skills development
- Measures against violence and harassment in the workplace
- Diversity

The description of the DMA is provided in ESRS 2, with additional details included to ensure clarity and comprehensiveness, primarily in SBM-3 and IRO-1.

A range of positive actual impacts in relation to own workforce has been identified across the companies of the Gigawatt division. Employees benefit from clearly defined employment conditions, social protection measures and standard employee benefits, which support job security, predictable working conditions and employee motivation. Collective bargaining agreements are in place across parts of the division, providing a structured framework for transparent employment relations.

Further positive actual impacts include access to health and safety measures, equal opportunity principles across all employment, career development and remuneration decisions, as well as training, upskilling, reskilling and continuous professional development opportunities. Job creation arising from the transformation plans and portfolio expansion represents another positive contribution to the workforce. In addition, the promotion of diversity and inclusion, including increased representation of women and under-represented groups at all organisational levels, including senior management, has been identified as a positive potential impact.

At the same time, occupational health and safety aspects inherent in operational and construction activities may lead to negative impacts for **LEAG Renewables GmbH**, **LEAG Clean Power GmbH** and **LEAG Biomass GmbH**, including risks to employee health and wellbeing arising from excessive workloads, insufficient rest periods or irregular working hours, as well as risks related to compliance with occupational safety and health requirements.

Opportunities have been identified in areas such as open communication, strong leadership-employee relations and flexible work-life balance policies, which have the potential to reduce conflicts, lower absenteeism and improve overall productivity. Ensuring a safe working environment supports the protection of employee health and wellbeing and contributes to stable and reliable operations. In addition, investment in employee development programmes and the adoption of technological advancements supported by targeted training can improve retention and contribute to long-term competitiveness.

A key challenge in the context of the ongoing transformation is securing a sufficiently skilled workforce to support the expansion of renewable energy, low-emission capacities and biomass-related activities within the Gigawatt division. This is closely linked to workforce development within the LEAG group, where the phase-out of lignite-based operations is expected to lead to a reduction in employment over time.

As part of this transformation, opportunities arise to transfer employees from the lignite business into companies of the Gigawatt division, thereby supporting both employment continuity and the development of a qualified workforce for future-oriented energy activities. At the same time, this transition requires targeted reskilling and upskilling to meet the changing qualification requirements of new roles.

The prospect of transitioning to new roles or transferring between companies within the group may also give rise to uncertainty and concerns among affected employees. Ensuring effective integration into the receiving companies, providing clear transition pathways and maintaining fair and transparent conditions, including the preservation of acquired rights where applicable, are therefore key factors in supporting a socially responsible transformation.



S1-2

Engaging with own workforce and business model

A structured, multi-channel approach to employee engagement and internal communication is applied across the Gigawatt division, combining standard communication formats with more direct, role-specific interaction. While core approaches are aligned, the specific implementation reflects the organisational structures and geographic footprint of the respective companies.

Standard communication channels, including intranet, mailings, information screens and notice boards as well as management information formats, are primarily implemented at LEAG group level and are used by **LEAG Renewables GmbH, LEAG Clean Power GmbH and LE Finance GmbH** to support consistent information and foster a shared understanding across these entities. These formats are largely managed and implemented by central functions, in particular **Corporate Communications, Human Resources and Regulatory Management**. The intranet serves as a central platform for information dissemination, knowledge management and employee engagement. It supports structured idea management, health and safety topics and business improvement initiatives.

In the biomass segment, which comprises entities integrated through acquisitions and includes operations outside Germany, internal communication is organised through established entity-specific channels and tools. These include an own intranet solution, e-mail communication and management information systems at Scandbio AB, while LEAG Pellets GmbH focuses on e-mail communication and in-person formats. These structures operate alongside group-level communication formats and reflect differing organisational setups and information needs.



Beyond formal communication channels, employee engagement within the Gigawatt division is supported through dialogue and participation processes, as well as through line management structures and daily interaction within teams, enabling direct and role-specific exchange. Digital collaboration tools are used to facilitate more focused topic- or project-specific exchange within defined user groups, in some cases spanning across company boundaries.

In addition, employee engagement and feedback are organised through direct exchange formats, such as town hall meetings and, where applicable, meetings with employee representatives (e.g. works council), adapted to specific company contexts and systems of employee representation. Structured processes further complement these formats, including employee surveys, which may be conducted using group-wide frameworks or entity-specific tools, as well as onboarding, goal-setting and development processes tailored to the respective organisational setup.

Employee engagement is coordinated through HR structures at both company and group level. A dedicated HR function is in place within Scandbio AB, operating largely independently in line with local legal frameworks, while HR activities for **LEAG Renewables GmbH, LEAG Clean Power GmbH, LE Finance**

GmbH and LEAG Pellets GmbH are supported through the LEAG group HR function. This overall setup is aligned with governance structures under the oversight of the Chief Human Resources Officer, ensuring that employee perspectives are captured and considered in strategic decision-making processes.

Companies within the Gigawatt division engage with employee representation bodies in accordance with applicable national frameworks. In Germany¹², this includes co-determination structures with works councils and trade unions, while in other jurisdictions, such as Sweden, engagement is primarily organised through trade union representation, including consultation requirements for major organisational changes.

To ensure that potential misconduct can be addressed appropriately and without fear, a **Compliance Management System (CMS)** is implemented at LEAG group level. The CMS includes provisions on reporting incidents through the whistleblower system and defines roles and responsibilities, including those of external ombudspersons, as well as procedures for appropriate follow-up actions. This system is applied across the core entities of the Gigawatt division, while in the biomass segment, additional or separate whistleblowing systems and compliance structures are in place at entity level.

¹² Although LEAG Renewables GmbH and LEAG Clean Power GmbH do not have their own works councils, employees are represented in the site works council at the Cottbus location. Overarching co-determination topics are addressed with the involvement of the respective group works councils at LEAG. LEAG Pellets GmbH currently does not have a works council (status as of 2025), although the establishment of such a structure is under consideration.

In
2025,
100%

of employees across the Gigawatt division participated in regular performance and career development reviews.

S1-3

Actions related to own workforce

Targeted actions have been implemented to address the identified impacts in relation to own workforce within the Gigawatt division. As these measures are integrated into the division's ongoing business strategy, no additional significant resources are currently required.

Stable employment practices support the Gigawatt division's operational strategy and demonstrate its commitment to fair labour practices and internationally recognised standards. Insecure employment conditions may adversely affect retention, motivation and long-term productivity. Accordingly, the Gigawatt division aims to provide long-term employment prospects through a forward-looking business strategy focused on renewable energy solutions aligned with decarbonisation pathways. At the same time, the ongoing transformation, new business opportunities and established framework conditions are enhancing its attractiveness in the labour market, while recognising that employment conditions and benefit structures may vary across entities and jurisdictions.

Safety and health at work

The Gigawatt division is committed to safeguarding the safety of its employees by providing appropriate training and regularly enhancing the governance frameworks and internal policies. For operations in Germany, including **LEAG Renewables GmbH, LEAG Clean Power GmbH** and **LE Finance GmbH**, occupational health and safety is supported by an **Occupational Health and Safety Management System aligned with the requirements of DIN ISO 45001:2018**. This management system provides a structured framework for identifying and assessing workplace hazards, defining preventive and protective measures, delivering targeted training and systematically reporting and investigating work-related incidents. The practical implementation of these measures is further guided by internal instruments such as the **Accident Prevention Concept**, the **Fire Protection Regulations** and the **Reporting Directive**, which defines clear processes for reporting, investigating and following up on work-related incidents and emergencies.

Other entities within the division, in particular Scandbio AB and LEAG Pellets GmbH, apply comparable health and safety management approaches in line with local legal and organisational requirements. Across the division, health and safety are treated as a top priority, supported by ongoing learning, knowledge-sharing and continuous efforts to embed a "health and safety first" culture within the division.

The health and safety management is monitored through a combination of central and entity-level structures. For **LEAG Renewables GmbH, LEAG Clean Power GmbH** and **LE Finance GmbH**, this includes oversight by a central **Health and Safety function**, while in other entities responsibilities are primarily located at local management level, for example with plant managers and departmental managers, supported by dedicated HR or safety functions. The effectiveness is assessed through risk assessments, training measures and workplace safety indicators.

As part of the commitment to employee health and wellbeing, **LEAG Renewables GmbH, LEAG Clean Power GmbH** and **LE Finance GmbH** offer a range of group-aligned health initiatives. These include practical offerings such as fitness courses, stress management strategies, nutrition advice and ergonomic support tailored for mobile working arrangements, complemented by individual consultations addressing topics including back health, sleep and stress management. In the Biomass entities, health-related measures are organised locally and may include site-specific offerings.

Professional development opportunities

Strong emphasis is placed on continuous professional development across the Gigawatt division. For **LEAG Renewables GmbH**, **LEAG Clean Power GmbH** and **LE Finance GmbH**, key initiatives include targeted programmes supporting managers throughout the LEAG group's transformation process, participation in the Lusatia Qualification Network for Renewable Energies (QLEE) and a wide range of additional internal training offerings.

The **Group Work Agreement on Employee Development**, applicable to **LEAG Renewables GmbH** and **LE Finance GmbH**, establishes a binding, co-determined framework for employees. It structures continuous professional development through regular development and performance talks, individual development plans and access to a learning management system, ensuring that employees can systematically build and update their skills. The effectiveness of professional development measures is supported through a digital competence matrix. Progress is monitored through participation tracking and documented development outcomes.

In the Biomass entities, training, qualification and employee development are organised locally through entity-specific programmes, own arrangements and dedicated management processes. The effectiveness of these measures is monitored through locally defined instruments, complemented where applicable by group-level approaches, including training participation, development talks and internally defined performance indicators.



Equal opportunity principles

The Gigawatt division applies equal opportunity principles in line with the LEAG group's **Code of Conduct**. Employment, career development and remuneration decisions are based on qualifications, performance and business needs and are not influenced by gender or other personal characteristics. A work environment is fostered in which all employees are treated fairly and with respect, and reported cases of discrimination or misconduct are addressed with the individuals concerned, involving managers or designated contact persons where appropriate.

A structured approach to employee communication and engagement has been established, including regular employee surveys that also address topics related to the transformation. In addition, **Disability Officers** have been appointed to support the needs of employees with disabilities, and a **Human Rights Officer** is in place to oversee the interests of minorities. However, a formalised process to

specifically evaluate and track the effectiveness of the disability officer and human rights officer roles has not yet been established.

Within Scandbio AB, these responsibilities are integrated into existing functions. The **HR Manager** covers human rights-related aspects, representation for employees with disabilities as well as health and safety, while the **Sustainability Manager** is responsible for environmental and sustainability compliance. In addition, safety representatives contribute to safeguarding human rights and the rights of employees with disabilities.

Steps are also being taken to ensure that the voices of vulnerable groups – such as people with disabilities and employees from minority backgrounds – are incorporated into internal planning through inclusive dialogue formats and targeted consultation.

For a detailed overview of the relevant policies, procedures and investigation mechanisms, please refer to the section ESRS 2 GDR-P.

S1-5

Employee characteristics

In 2025, the companies of the Gigawatt division employed a total of 346 people¹³, of which 273 identify themselves as male and 73 as female; 96 % of the total employees had a permanent contract.

Part-time is an option of the working time model, but it is not used to a large extent. 16 out of 346 employees are in top management, making it 5 % of all of the employees of the division. About 75 % of top management positions are held by men and 25 % by women. In 2025, the combined employee turnover rate for all companies of the Gigawatt division was 23 %.

346

people employed in Gigawatt division

A further 63 employees from the LEAG group are permanently engaged in the business areas of the Gigawatt division demonstrating the effective utilisation of internal talent and supporting workforce transition within the group.

Female	Male	Other	Not disclosed	Total ¹⁴
Number of employees (FTE)				
73	273	0	0	346 ¹⁵
Number of permanent employees (FTE)				
69	264	0	0	333
Number of temporary employees (FTE)				
3	10	0	0	13
Number of managerial positions				
4	12	0	0	16
Number of non-managerial positions				
69	261	0	0	330

Table 17: Employee characteristics 01.01. – 31.12.2025

For a detailed overview of the relevant metrics please refer to ESRS 2 GDR-M section of this Report.

¹³ Values represented as average number of full time equivalent (FTE) employees.

¹⁴ Decimal values have been rounded.

¹⁵ Employee figures refer to the Annual Report 2025. In deviation from the reporting date of 31.12.2025 used in the financial statements, the employee figures in this Report are disclosed as the annual average number of full-time equivalents (FTE).

Methodology and data quality

Employee figures are reported on a full time equivalent (FTE) basis. FTE represents all employees in an employment relationship with the organisation, including those on parental leave, but excludes individuals working under contracts for services or on a trade license. FTE is calculated by dividing the total hours worked by all employees (excluding overtime), including holidays, sick leave and other paid non-working time, by the standard working hours of a full-time employee for the reporting period.

For the purposes of this reporting, a permanent employment contract is defined as an agreement for full-time or part-time work for an indefinite period, whereas a temporary employment contract has a fixed duration and ends upon a specific event, such as completion of a project or the return of an employee being replaced.

The top management of the Gigawatt division is included on this basis and comprises the senior management level (Leitende Angestellte) of the individual companies within the division – **LEAG Gigawatt GmbH, LEAG Renewables GmbH, LEAG Clean Power GmbH, LEAG Biomass GmbH**, including LEAG Pellets GmbH and Scandbio AB, as well as **LE Finance GmbH**. This includes those members who do not hold dual roles within the LEAG group and are not part of pre-existing employment relationships from other entities within the group. Executives refer to top management, while non-executives include all other employees.



S1-6

Non-employee characteristics

The total number of non-employees working within the Gigawatt division is 4, all of whom are engaged in the biomass segment. The other companies in the Gigawatt division do not engage any persons who are not directly employed by them.

Engaging non-employees requires careful assessment to ensure that independent contractors and self-employed service providers are classified correctly under applicable law and that their engagement does not result in an unintended employment relationship or, where relevant, another regulated labour-supply arrangement. Internal rules and review procedures support compliance in the onboarding and monitoring of such service providers.



S1-8

Diversity metrics

Within the Gigawatt division principles of equality, diversity and non-discrimination are applied across all work-related activities carried out by its companies. Diverse backgrounds and perspectives are valued, and efforts are made to attract and retain people with a wide range of skills and experiences.

These principles are anchored in the LEAG group **Code of Conduct**, which is binding for the Gigawatt division. While the **Code of Conduct** reflects elements of international frameworks such as ILO (International Labour Organisation) Convention No. 111, it is primarily based on German legislation, which incorporates these standards. In addition, Scandbio AB applies its own Code of Conduct, which establishes comparable principles regarding fair treatment, equality and diversity, including a clear commitment to equal treatment, non-discrimination and a respectful working environment.

The energy sector has historically faced challenges in attracting female talent, and a gender imbalance remains. To address this, the LEAG group has established initiatives such as a women's network and a self-commitment initiative for women in management positions, which are applicable within parts of the Gigawatt division depending on organisational structures. Ongoing monitoring of these efforts highlights the importance of diversity and long-term professional development within the group.

S1-12

Training and skill-development

Mandatory trainings in the areas of IT security, data protection and compliance are conducted at LEAG group level and apply to employees engaged in the activities of **LEAG Renewables GmbH, LEAG Clean Power GmbH and LEAG Finance GmbH**.

This is generally done by means of a corresponding e-learning tool, but also via personal instruction for employees who do not have a PC workstation. In other entities within the Gigawatt division, including Scandbio AB and LEAG Pellets GmbH, comparable training topics are addressed through local training formats and systems in line with entity-specific requirements and regulatory frameworks.

The content, training participants and training cycle are determined according to the department and work tasks and are defined in LEAG group guidelines or corresponding local procedures. For employees covered by the LEAG group training system, who have professional contact with competitors or are involved in procurement processes, compliance-related training is typically conducted at least once every three years in staggered waves. The same frequency applies for data protection. IT security trainings are conducted annually for employees with a workstation

account. In other entities, training frequency and formats are defined locally and may include internally delivered training, documented instruction or external learning tools.

During 2025 reporting year, the employees of **LEAG Biomass GmbH** and its substructure completed 38h of trainings. No data is available for **LEAG Renewables GmbH**, **LEAG Clean Power GmbH** and **LE Finance GmbH**, as these entities do not track the amount of time employees spend participating in training activities. Instead, only mandatory training completion and outstanding training requirements are monitored.

The transformation of LEAG's power generation business creates specific requirements for workforce development, particularly with regard to reskilling, upskilling and supporting organisational change. Within this context, qualification measures and targeted personnel transfer go beyond pure competence development and serve as vital instruments for ensuring long-term employment security throughout structural change.

These requirements are addressed through structured development frameworks, including the **Group Work Agreement on Employee Development**. It applies to **LEAG Renewables GmbH** and **LE Finance GmbH** and establishes a co-determined approach to employee development, outlining development opportunities and HR tools across the employee journey to support both employee needs and organisational goals. For LEAG Clean Power GmbH, the agreement was negotiated prior to its establishment. Entities within the biomass segment differ in their organisational structures and business context from the transformation processes addressed by the agreement. In these entities, employee development is governed through local arrangements and management processes.

During the reporting period, targeted programmes were implemented to support managers in the organisation's transformation, focusing on commercial awareness, performance, health, communication and feedback. These activities are implemented at LEAG group level but are fully applicable to companies of the Gigawatt division.

Lusatia Qualification Network for Renewable Energies (QLEE)

Since 2022, the LEAG group has participated in the Lusatia Qualification Network for Renewable Energies (QLEE) in cooperation with the Institute for Industrial Training Research (IBBF) and the Renewable Energy Federation (BEE). QLEE provides an innovative, region-specific training platform that develops future-oriented skills in areas such as photovoltaics, wind energy, energy storage and digitalisation through practical training, modular qualification offers and close collaboration with educational institutions and companies. The programme is particularly aimed at employees from the lignite division who are seeking to transition into new roles and supports qualification for activities within the Gigawatt division.

The strength of QLEE lies in its partnership-based structure. Cooperation between companies and educational institutions promotes the exchange of knowledge and best practices, supports standardised qualification paths and joint innovation initiatives, and enhances regional resilience. The cooperative approach contributes to the structural development of the region affected by the coal phase-out by supporting the transformation of regional energy systems and strengthening the local skills base. In 2025, the network comprised 21 member companies and delivered over 800 participant days in qualification programmes.

S1-7, S1-10

Social protection and collective bargaining agreements

All employees in the Gigawatt division’s own workforce are covered by legally mandated social protection against loss of income due to:

- Sickness
- Unemployment¹⁶
- Employment injury and acquired disability
- Parental leave
- Retirement

The companies within the Gigawatt division operate across multiple EU jurisdictions, including Germany, the Czech Republic, Sweden and Latvia, each with distinct legal frameworks governing collective bargaining rights. Across all operating countries, applicable statutory or contractual arrangements are in place to ensure that employee rights in this regard are appropriately covered

and upheld. It is the strategic objective to proactively foster the conclusion of collective agreements and establishment of workers representatives in developing business sectors.

Additionally, the **Group Work Agreement on Employee Development**, applicable to **LEAG Renewables GmbH** and **LE Finance GmbH**, preserves all co-determination rights of the respective works councils. Through strategic workforce planning, structured internal staffing processes and targeted qualification measures, the agreement aims to strengthen employees’ long-term employability and to provide stable development perspectives, going beyond short-term or purely transactional HR measures.

¹⁶ This refers to social protection coverage provided during employment, which ensures eligibility for benefits in the event of future job loss (public unemployment insurance programme).

		2025
Employees with collective bargaining agreements	FTE average	166
Percentage of employees with collective bargaining agreements	%	48
Employees in country (EEA) covered by workers' representatives	FTE average	68
Percentage of employees in country (EEA) covered by workers' representatives	%	20

Table 18: Employees covered by collective bargaining agreements

In 2025, the percentage of employees covered by collective bargaining agreements stands at

48%

Collective bargaining agreements reflect co-determined frameworks for working conditions, labour standards and equitable remuneration. For operations within the European Economic Area (EEA), 20% of employees are covered by institutionalised worker representation in countries outside Germany’s primary collective bargaining framework.

S1-13

Health and safety

Health and safety on sites are a fundamental priority for the Gigawatt division, reflecting the commitment to incident prevention and continuous monitoring across all operational and project-related activities.

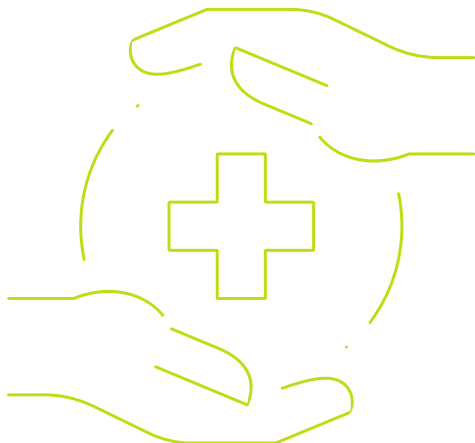
Health and safety standards are established and ensured through different organisational approaches across the division. For operations in Germany, including **LEAG Renewables GmbH, LEAG Clean Power GmbH** and **LE Finance GmbH**, this is supported by an **Occupational Health and Safety Management System based on the requirements of DIN ISO 45001:2018**. Scandbio Latvia Ltd. is covered by a separate health and safety certification under ISO 45001:2018. Other entities within the division, including Scandbio AB and LEAG Pellets GmbH, apply entity-specific health and safety systems in line with local legal requirements and organisational structures.

Organisational responsibilities for health and safety reflect these structures. For **LEAG Renewables GmbH, LEAG Clean Power GmbH** and **LE Finance GmbH**, LEAG's central **Health and Safety functions** provide guidance and specialist support. It includes the performance and documentation of risk assessment within the EPLAS health and safety management system, with the aim of ensuring process efficiency, quality assurance, transparency and legal compliance. For Scandbio AB, health and safety is supported by own HR structures, including the HR Manager and HR administration, who support the organisation with developing and following-up health and safety related strategies and routines, as well as following-up KPI's, performing safety rounds, safety committee meetings and certain risk assessments. Legal responsibility lies with department managers and plant managers. In addition to central health and safety guidelines in LEAG Pellets GmbH, external occupational safety specialists are engaged to define requirements and provide documentation.

The LEAG group's **Fire Protection Regulation – Organisational Manual** sets standards and principles for fire safety for all locations in Germany. This framework defines preventive measures, behavioural requirements in the event of a fire, including alarm procedures, evacuation and initial fire-fighting, as well as roles and responsibilities for site management and designated fire safety functions. Compliance is supported through defined structures, ensuring that applicable requirements are reflected in day-

100%

of the employees within the Gigawatt division are covered by health and safety management system based on legal requirements.



to-day operations. For LEAG Biomass entities fire safety management is organised and implemented independently and ensured in accordance with applicable national legal requirements and local operational frameworks.

Risk assessments provide the foundation for identifying and evaluating fire and explosion hazards, mechanical risks and heat-related dangers. These are supported by technical protective measures such as dust control systems, zoning, machine locking mechanisms and sensor-based safety features, maintenance procedures, permit processes for specific activities in designated areas, emergency response arrangements and the provision of personal protective equipment, including hearing protection, masks, heat protection and other safety equipment.

Given the diversity of operational activities across the Gigawatt division, targeted safety training is provided for specific work requirements. This includes training for work in heights, electrical safety and machinery operations, with training formats and delivery methods varying across entities depending on organisational setup and regulatory requirements.

In addition, the commitment to health and safety is supported by health promotion programmes applicable to **LEAG Clean Power GmbH, LEAG Renewables GmbH, LEAG Pellets GmbH** and **LE Finance GmbH**. These include health days and activities under the

STARK campaign, which promotes safety (Sicherheit), teamwork (Teamgeist), recognition (Anerkennung), support (Rückhalt) and collaboration (Kollegialität). The STARK campaign contributes to accident reduction by rewarding strong safety performance, including low lost time injury frequency rates (LTIFR) and promoting a safer working environment.

Preventive health measures form an integral part of the employee health and well-being approaches across the division. Depending on site-specific requirements and frameworks, these measures include preventive medical check-ups, vaccinations, access to occupational health consultations and health promotion days, during which employees can receive consultations from specialists such as optometrists, orthopaedists and nutritionists.

In addition, depending on the specific job profile and related occupational risks, such as exposure to noise, heat, working at heights, or traffic and driving-related activities, employees may undergo occupational health or fitness examinations to support workplace safety and employee well-being. Social counselling services are also available to assist employees with personal, work-related, or health-related concerns.

The following metrics connected to health and safety have been recorded within the scope of the Gigawatt division for the year 2025:

0 fatal injuries
1 registered injury
(under the scope of LEAG Biomass GmbH)
10 days lost to work-related injuries and work-related ill health
1.6 lost time injury frequency¹⁷

There are **no cases of recordable work-related ill health** under the scope of the Gigawatt division for the reporting year 2025¹⁸.

For a detailed overview of the relevant policies, procedures and investigation mechanisms, please refer to ESRS 2 GDR-P section of this Report.

¹⁷ This indicator includes both the Gigawatt division and the Lignite division of the LEAG group.

¹⁸ Number of inquiries from the employers' liability insurance association on reports of suspected occupational diseases (processing in accordance with §§191, 192 Sozialgesetzbuch, SGB VII).

S1-14

Work-life balance metrics

Employees within the Gigawatt division are provided with working conditions that support a sustainable and healthy work-life balance.

In line with applicable legislation, all employees are entitled to maternity, paternity and parental leave. In addition, structured reintegration support is available following periods of absence such as parental leave, sabbaticals or extended sick leave. The standard working arrangement ranges from a 37 – 40-hour week and 28 – 30 days of annual leave, supplemented by up to five additional days off per year for special occasions such as the birth of a child or marriage. Vacation entitlements are managed within the fiscal year, and overtime is compensated through additional leave or, where applicable, recorded in long-term working time accounts. Shift work arrangements are in place for operational business activities.

Flexible working options are available across the division, including full-time and part-time arrangements and remote working where the nature of the role permits. Employees benefit from a broad range of additional support, including free personal protective workwear, company-owned restaurants at multiple locations, a company doctor, company sports programmes and groups, a company pension scheme, employee discounts and job bike schemes, with specific offerings varying across locations and entities. Individual development plans, personnel development interviews and access to qualifications, training and seminars through the LEAG group's qualification centre in Germany further reinforce the Gigawatt division's commitment to long-term employee wellbeing, professional growth and adaptability.



S1-9, S1-15

Remuneration metrics and adequate wages

Remuneration at the companies within the Gigawatt division is based on fair, transparent and objective criteria. Compensation, benefits and opportunities for advancement are determined by factors such as performance, qualifications and scope of responsibilities.

In accordance with the principles outlined in the LEAG group's **Code of Conduct**, the division ensures that all employees are treated fairly and with respect, and that pay-related decisions support equal participation and non-discriminatory practices.

Where applicable, remuneration is covered by collective agreements, including regulations on salary levels, bonuses, working hours, vacation entitlements and retirement benefits. This approach supports pay equity by promoting consistent conditions for comparable roles.

In 2025, the average remuneration for female employees at the Gigawatt division exceeded that of male employees by 9%, with a gender pay ratio

of 109%, highlighting a balanced internal income distribution. This figure supports the commitment to equal pay and fair compensation practices across the Gigawatt division's operations. Remuneration figures include fixed salary, bonuses and other cash benefits.

The gender pay ratio was calculated based on the average annual total remuneration of female and male employees across all business units of the Gigawatt division.

In 2025, the highest-paid individual's total annual remuneration was approximately 4 times the median annual remuneration of all the other employees within the Gigawatt division, excluding Scandbio AB, which was not included in the median calculation.



S1-16

Incidents and complaints

The LEAG groups' **Code of Conduct** provides an overarching framework within which the Gigawatt division operates, embedding a firm commitment to fair, transparent and non-discriminatory practices across all areas of employment.

All employees are entitled to fair and equal treatment that reflect their performance, qualifications and responsibilities regardless of gender, religion, sexual orientation, political opinions, disability, or any other legally protected characteristic.

Any issues, whether concerning pay or behaviour, should be reported to a supervisor or designated contact. Reports are handled confidentially and dealt with promptly, ensuring a fair and respectful workplace.

In the reporting period, **no severe human rights incidents** such as forced labour, human trafficking, or child labour were identified in the Gigawatt division operations. Consequently, **no fines, penalties, or compensation payments** related to such incidents were recorded.

The data has been compiled from the LEAG group's internal reporting systems, including the HR case management tool and grievance mechanism database. **No complaints** were submitted through the National Contact Points for the OECD Guidelines¹⁹ during the reporting period.

¹⁹ OECD – Organisation for Economic Co-operation and Development; OECD Guidelines – Guidelines for Multinational Enterprises on Responsible Business Conduct



An overhead photograph of three construction workers on a site. They are wearing high-visibility yellow safety vests and hard hats (two white, one yellow). One worker is pointing with a pen at a set of architectural plans held by another. A laptop is open on the ground between them. The background is a rough, light-colored concrete or dirt surface.
S2

Workers in the value chain

Respect for the rights of workers throughout the value chain is recognised as a responsibility. Appropriate due diligence processes are applied within activities of the Gigawatt division to assess risks related to labour standards and fair working conditions among suppliers and service providers. These efforts form part of the broader approach to ethical conduct across all stages of the value chain.

SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the DMA outlined in the section on material IROs, the following sub-topics related to S2 Workers in the value chain are identified as material:

- Working time
- Secure employment
- Health and safety
- Training and skills development
- Child labour
- Forced labour

The description of the DMA is provided in ESRS 2, with additional details included to ensure clarity and comprehensiveness, primarily in SBM-3 and IRO-1.

Material impacts and opportunities in relation to workers across the value chain have been identified, with no related risks identified as part of the assessment.

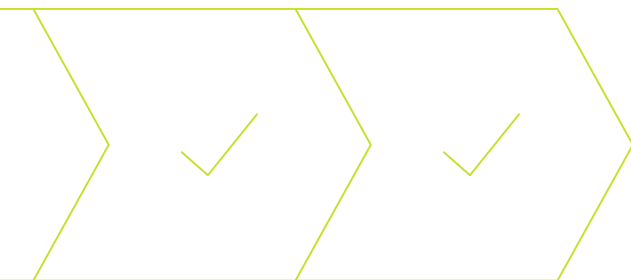
Potential negative impacts include health and safety incidents arising from hazardous working conditions in constructions, installation, forestry and processing activities, as well as risks related to forced labour along the value chain, with **LEAG Renewables GmbH, LEAG Clean Power GmbH** and **LEAG Biomass GmbH** identified as primary entities within the scope. Additional potential negative impacts include worker exposure to hazardous environments without adequate protective equipment and supply chain non-compliance, potentially leading to violation of fundamental labour rights.

These negative impacts are addressed through a range of governance and management measures within the division's supply chain framework.

Positive impacts have been identified across the companies of the Gigawatt division, including compliance with labour standards, the application of strict safety requirements and, for entities operating in Germany, the implementation of the Supply Chain Due Diligence Act.

In this context, job creation and the promotion of decent work and labour right standards represent a further positive impact, particularly for **LEAG Renewables GmbH, LEAG Clean Power GmbH** and **LEAG Biomass GmbH**, where upstream supply chain involves labour intensive contractors, wood suppliers and sawmill operations.

Building on these measures, further opportunities arise across **LEAG Renewables GmbH, LEAG Biomass GmbH** and **LEAG Clean Power GmbH**. In particular, regular safety briefings, instructions and sampling controls have the potential to prevent accidents, reduce downtime and improve overall workforce reliability.





S2-2

Engaging with workers in the value chain

Engagement with workers in the value chain take place through various established approaches.

During the procurement phase, the companies of the Gigawatt division define key expectations, including compliance with legal and procedural requirements, relevant certifications, performance outcomes, pricing, communication protocols and appropriate conduct on their sites.

The implementation of these expectations depends on the specific workplace. Provided that suppliers meet the defined standards, the companies of the Gigawatt division do not intervene in their internal business practices, such as diversity policies, remuneration structures, or internal communication.

Contractors and third-party workers play a key role in supporting operations and are required to meet the same safety standards through introductory safety training and strict adherence to protocols. Although they are not included in internal training programmes, they receive targeted guidance to ensure compliance with safety and operational requirements. Workforce management oversees fair labour practices and ensures effective coordination with external providers.

No Global Framework Agreements with union federations are currently in place across the companies of the Gigawatt division. However, where suppliers are unionised, collective bargaining outcomes are respected and alignment with these agreements is encouraged.

Workers in the value chain and the external service partners are enabled to report violations through various channels, reflecting both group-level and entity-specific arrangements. For entities operating within the LEAG group framework, this includes anonymous external reporting via an ombudsperson under the **Compliance Management System**. In other entities, including those outside Germany, reporting is facilitated through locally implemented whistleblowing systems in line with applicable legal and organisational requirements.

Relevant information is available on the website of the LEAG group under the section for partner companies²⁰. This section outlines the commitment to the principles and core values of the UN Global Compact and provides details on whistleblower contact channels, as well as objectives for collaboration with service providers and suppliers. Information for Scandbio AB is provided on the company's website²¹.

For further details on stakeholder engagement, please refer to SBM-2 – Interests and views of stakeholders.

²⁰ LEAG's suppliers' information page: <https://www.leag.de/en/company/suppliers/> (22.04.2026).

²¹ <https://report.whistleb.com/en/scandbio>

S2-3

Actions related to workers in the value chain

The companies of the Gigawatt division are committed to responsible and transparent supplier cooperation, underpinned by clearly defined actions to mitigate and prevent any potential negative impacts related to occupational health and safety and human rights across the value chain.

The effectiveness of these actions is monitored through a combination of audit outcomes, self-assessment, on-site visits, certifications and the tracking of concerns raised through whistleblowing and complaint mechanisms.

Suppliers are contractually required to comply with the **Code of Conduct** and related ethical minimum standards, with compliance being reinforced through supplier audits conducted at holding level. Additionally, in Germany the Supply Chain Due Diligence Act provides another overarching legal framework, establishing binding due diligence obligations and defining requirements for responsible supply chain management. While the German legislator has retroactively removed the formal obligation to submit standalone reports under the German Supply Chain Due Diligence Act, the statutory due diligence framework remains fully active and binding.

For German entities contractors are required to designate responsible supervisors in writing, ensure sufficient written and spoken German language proficiency to understand and implement safety instructions, and, for larger suppliers, maintain certified occupational health and safety management systems. Specific safety rules apply to work involving hazardous substances and work in environments with dust and noise pollution as well as vibration. External workers receive instructions on site-specific hazards, safety regulations and the correct handling of work areas and facilities.

With regard to sourcing, **LEAG Renewables GmbH** and **LEAG Clean Power GmbH** procure goods and services in international markets, with sourcing decisions assessed against operational, financial, geopolitical and legal risks. In the biomass segment, raw materials are primarily sourced from Germany and the Czech Republic, as well as Sweden, Latvia and Norway in the case of Scandbio AB. These countries are subject to established labour, health and safety regulations. LEAG Pellets GmbH validates suppliers through self-declarations, on-site visits and risk-based monitoring, with increased frequency of checks where elevated supply chain risks are identified.

All value chain workers have access to reporting mechanisms, including anonymous whistleblowing channels free from risk of reprisal, enabling concerns relating to conflicts of interest, working conditions, or human rights violations to be raised safely and independently. Discrimination is strictly prohibited and respect for human rights is upheld as fundamental principle across all supplier and contractor relationships.

S3

Affected communities

It is recognised that activities related to the Gigawatt division extend beyond facility boundaries and into the lives of the surrounding communities. There is a commitment to proactively prevent and mitigate any impact these activities may cause, while equally striving to be an engaged community partner, facilitating open dialogue and partnership with affected communities.



SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the DMA outlined in the section on material IROs the following sub-topics related to S3 Affected communities are identified as material:

- Land-related impacts
- Freedom of expression

The description of the DMA is provided in ESRS 2, with additional details included to ensure clarity and comprehensiveness, primarily in SBM-3 and IRO-1.

Potential negative impacts include effects on biodiversity arising from the expansion of wind and photovoltaic installations as well as biomass sourcing, particularly for **LEAG Renewables GmbH** and **LEAG Biomass GmbH**. Additionally, failure to ensure open and meaningful community dialogue may lead to unresolved concerns, increasing the risks of conflicts, legal challenges, project delays and reputational damage across **LEAG Renewables GmbH**, **LEAG Clean Power GmbH** and **LEAG Biomass GmbH**.

These risks are addressed through established community engagement and stakeholder dialogue practices, which aim to ensure early involvement, transparency and the consideration of local concerns. In this context, engagement and compensation on a legal basis represent an important management approach, particularly for **LEAG Renewables GmbH**, where community acceptance is a key factor for project development and approval.

Building on these engagement practices, broader contributions to local community development further support trust and acceptance, particularly in relation to project-based activities within the division's growth areas. Such activities, including support for sport and social initiatives, are centrally coordinated at LEAG group level to ensure a consistent approach, alignment with overarching strategic objectives and efficient allocation of resources. Through this coordinated approach, positive impacts are generated at local level, thereby strengthening social cohesion.

Net Zero Valley Lusatia

The transition of the energy system creates new opportunities for affected communities. In this context, the Lausitz region (Lusatia) has been designated as Europe's first Net Zero Valley, aiming to support the development of climate-neutral industrial value chains, attract investment and create future-oriented jobs as part of the structural transformation. The LEAG group supports this initiative as part of its regional transformation efforts, contributing to the development of sustainable energy infrastructure. The initiative places particular emphasis on aligning economic development and industrial transformation with social considerations like employment perspectives and workforce transition, thereby supporting long-term acceptance of the transformation within local communities.

S3-2

Engaging with affected communities

Compliance with all applicable laws, regulations and obligations arising from permits forms the fundamental basis for the Gigawatt division's operations.

Within legally defined participation procedures, and in certain cases also through early-stage public consultations, municipalities and local political bodies are involved in decision-making processes. In this context, they either act as public authorities or play a decisive role themselves, for example in the preparation or amendment of land-use plans, development plans or formal resolutions, particularly for renewable energy and industrial site development. This framework requires a relationship based on trust, transparency and continuous communication between representatives of municipalities and local authorities and representatives of the Gigawatt division.

Engagement with communities helps the companies of the Gigawatt division better understand local concerns, stakeholder needs and community perspectives. While no fully formalised, division-wide engagement process is currently in place, stakeholder engagement is organised through established structures and tailored

to site and project requirements. Within the biomass segment, engagement with local communities is primarily conducted in a targeted and context-specific manner, for example in connection with stakeholder inquiries, feedback processes or regulatory interactions related to site operations.

For **LEAG Renewables GmbH** and **LEAG Clean Power GmbH**, engagement is coordinated through the **Regional Management function** of the LEAG group. These formats involve municipalities, political representatives, regional associations, citizens and farmers, taking into account the specific operational context, potential impacts and consultation needs of individual projects and activities. In this context, engagement activities reflect the ongoing development and expansion of renewable energies and low-emission technologies, as well as their role within the broader regional transformation process in former coal regions.

Formal consultation procedures as part of permitting processes, for example under the German Federal Emission Control Act (BImSchG), are managed by the **Permitting function**. Communication with committees, associations and stakeholders at the regional and local political level is primarily coordinated by the **Head of**

Regional Management. In addition to maintaining continuous dialogue with district administrations and local authorities, representatives of Regional Management regularly participate in municipal meetings, committee sessions and stakeholder forums relevant to the Gigawatt division's related topics and regional development matters. Within the Regional Management function, dedicated representatives are assigned to specific regions, enabling closer familiarity with local conditions and stakeholders as well as ensuring clear and accessible points of contact. Where subject-specific expertise is required, Regional Management is supported by representatives **LEAG Renewables GmbH** and **LEAG Clean Power GmbH**.

Regional Management also maintains ongoing engagement with locally based companies, associations, clubs and community initiatives through participation in networking events, business forums and externally organised citizen dialogues. In this context, regional managers fulfil both a listening and coordinating role, ensuring that relevant stakeholder feedback and community-related topics are collected and communicated internally within the division.

Political engagement at the Federal State and national level is coordinated through the **Public Affairs function**, with regular exchanges between Public Affairs, Regional Management and the respective operating companies to align communication approaches and ensure a consistent understanding of relevant developments and stakeholder expectations. This includes the perspectives and operational contexts of **LEAG Renewables GmbH, LEAG Clean Power GmbH** and **LEAG Biomass GmbH**.

The Gigawatt division does not operate in areas where indigenous people, as defined under international law, are present or affected. *For further details on stakeholder engagement, please refer to SBM-2 – Interests and views of stakeholders.*

S3-3

Actions related to affected communities

Actions related to affected communities focus on transparent and structured engagement to support project implementation and address potential acceptance-related risks. These activities aim to build and maintain trust and long-term relationship with local stakeholders.

Engagement with affected communities is implemented through a range of project-specific and needs-based dialogue formats. These include, in particular, site visits (e.g. guided community visits such as at the Forst-Briesnig II wind farm), public information events, regular exchange formats with key stakeholder groups such as annual meetings with farmers, as well as additional dialogue formats tailored to specific project phases and local requirements. These formats are designed to provide transparent information, address concerns and enable early and continuous stakeholder involvement.

To further support transparency and participation, the LEAG group introduced a Municipal Package in 2024, designed to support the acceptance of renewable energy projects. This initiative provides a standardised, transparent and legally compliant model for municipal participation. It enables municipalities to clearly understand and benefit from their involvement in energy transition efforts.

In addition, actions include targeted social initiatives that contribute to local community development and promote quality of life in the region, such as

support for sporting, cultural and social projects. These activities are coordinated by central functions such as **Communications** and **Regional Management** at LEAG group level, to ensure consistency, alignment with strategic objectives and efficient allocation of resources, while contributing to positive impacts at regional and local level. Overall, these measures aim to increase awareness and understanding of LEAG's activities as an energy producer. They are closely linked to supporting the transformation of LEAG's business model and therefore also relate to the activities of **LEAG Renewables GmbH** and **LEAG Clean Power GmbH**.

Smaller-scale donations and sponsorships may also be carried out directly by individual companies of the Gigawatt division, including the biomass segment, particularly at local level. In 2025, a total of approximately €745,000 was spent by LEAG GmbH on donations and sponsorships, of which around 6% related to donations and 94% to sponsorships. In addition, approximately €28,000 was disbursed directly within the Gigawatt division.

S4

Consumers and end users

Responsibility towards end users includes ensuring reliable energy availability and maintaining high standards of service in areas of direct engagement. Within the Gigawatt division, such direct engagement takes place primarily through **LEAG Biomass GmbH**, which maintains direct customer relationships in the supply of pellet-based heating solutions. The electricity generated by **LEAG Renewables GmbH** is predominantly marketed via energy exchanges, resulting in limited direct interaction with end users. **LEAG Clean Power GmbH** currently operates the gas-fired power plant in Leipzig, which functions as a grid stabilisation asset and is dispatched exclusively upon request by the transmission system operator Amprion; it does not participate in electricity trading.



SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the DMA outlined in the section on material IROs, the following sub-topics are identified related to S4 Consumers and end users as material:

- Privacy
- Access to (quality) information
- Access to products and services

The description of the DMA is provided in ESRS 2, with additional details included to ensure clarity and comprehensiveness, primarily in SBM-3 and IRO-1.

Unlike traditional B2B or product-based B2B markets, the energy generation and supply activities conducted by the Gigawatt division operate within a highly regulated and infrastructure-driven commercial framework, where direct customer-facing impacts are limited in nature and scope. Accordingly, the DMA identified material customer-related impacts primarily in relation to **LEAG Biomass GmbH** and its subsidiaries, whose pellet supply activities involve direct end user contact and product specific responsibilities.

For **LEAG Biomass GmbH**, key risks relate to access to reliable information, as incomplete or non-compliant data on pellet quality or certification can trigger regulatory scrutiny, cause reputational damage, reduce sales and ultimately lead to customer dissatisfaction.

At the same time, positive potential impacts arise from ensuring access to biomass-based energy products, thereby supporting a reliable supply for downstream customers and end users such as pellet buyers and distributors, as well as from supplying certified biomass fuels that enable more efficient, lower-emission heating solutions for commercial and household users.



S4-2

Engaging with consumers and end users

The subsidiaries of **LEAG Biomass GmbH** – **LEAG Pellets GmbH** and **Scandbio AB** – engage actively with consumers and end users through a mix of digital and direct communication channels to ensure transparency, accessibility and responsiveness.

Pellet sales by LEAG Pellets GmbH are conducted under the established REKORD brand of the LEAG group and other brands in the market.

Engagement with customers and end users happens directly through the official websites and online shops operated by the respective companies, as well as via email, phone, or the contact form option. The effectiveness of these channels is being tracked.

Feedback and complaints for Scandbio AB are recorded in the Customer Relationship Management (CRM) system, investigated and communicated back to customers, with root cause analyses conducted by the complaints team and reported monthly against established targets. In addition, customer feedback is collected through NPS (Net Promoter Score) surveys for each consumer pellet purchase and through periodic customer surveys in the business-to-

business segment every two to three years. For LEAG Pellets GmbH, customer feedback and complaints are managed through a dedicated complaints officer and an established system architecture. Feedback is recorded and processed in line with defined procedures, ensuring structured evaluation, traceability and continuous improvement.

Additionally, the marketing teams participate in trade fairs and industry events to facilitate dialogue and gather feedback, while direct contact points, such as customer service or dedicated account managers, enable personalised support and relationship building. Furthermore, on wholesale level applicable to the biomass sector, communication is established via key account managers for feedback, inquiries or complaints. Feedback is collected, evaluated and clustered on product specific basis in order to respond directly and identify whether strategic improvement measures can be derived.

Customers and end users are treated uniformly in line with the LEAG group's ethical standards, with no differentiation between customer groups.

Information provided, such as calorific values, prices, application suitability, safety information, storage conditions, certification and other information is regularly updated.

For further details on stakeholder engagement, please also refer to SBM-2 – Interests and views of stakeholders.



Jänschwalde I landfill solar park
completed in May 2025



S4-3

Actions related to consumers and end users

Customer-related actions focus on ensuring transparent pricing, clear communication and reliable product quality. Pricing structures are designed to be fair and comprehensible, without hidden fees or misleading terms. Where applicable, national regulations providing protection for vulnerable or disadvantaged customers are fully complied with.

To support informed decision-making, clear communication, straightforward contractual terms and accessible customer support are provided. In addition, a structured product quality framework ensures that all biomass pellets are backed by relevant certifications and attest to their quality, origin and compliance with applicable standards. Comprehensive product information, including data sheets on safe handling, storage and use, is made available to customers. A dedicated complaints and reclamation process enables them to raise product-related concerns in a timely and systematic manner. These measures reinforce the commitment to customer protection, product integrity and long-term customer trust.

Customer-related actions in the biomass sector are funded through the respective subsidiaries' operational budgets and, where applicable, investment plans.

In contrast, the activities of **LEAG Renewables GmbH** and **LEAG Clean Power GmbH** do not typically involve direct interaction with end users. Their contribution to end user-related outcomes primarily lies in the provision of reliable and increasingly decarbonised electricity. Through the development and operation of renewable energy assets and supporting infrastructure, battery energy storage systems and dispatchable capacities, these companies contribute to the availability of clean energy and support broader decarbonisation objectives at national and European level.



Governance

The governance section of this Report includes the following main topics: corporate culture, protection of whistleblowers, political engagement, management of supplier relationships, including payment practices, as well as prevention of corruption and bribery.

G1

Business conduct



Governance related to sustainability matters is defined and steered at the level of the LEAG group and provides an overarching framework for the Gigawatt division. It is supported by corporate policies, especially the **Code of Conduct**, and governance practices that promote consistent application throughout the organisation. It establishes common principles and expectations that guide business conduct, while implementation reflects the respective organisational and regulatory contexts.

Within this framework, roles and responsibilities for managing sustainability-related topics are clearly defined, including responsibilities for compliance, risk identification and internal controls. Relevant requirements are embedded into business processes and decision-making, supported by established policies and procedures that ensure transparency, accountability and alignment with evolving legal and regulatory requirements.

The role of the administrative, management and supervisory bodies related to business conduct

Administrative, management and supervisory bodies play a key role in fostering an ethical business environment.

Responsibility for ensuring compliance lies with the individual entity manager within the Gigawatt division. Regardless of the delegation of tasks, corporate management remains responsible for the compliance-compliant organisation as well as for the leadership, management and oversight of the organisation and its processes.

Beyond formal oversight duties, the administrative, management and supervisory bodies support the consistent application of business conduct principles in operational activities and decision-making processes. This includes promoting a group-wide culture of integrity and encouraging proactive engagement with ethical issues, both strategic and day-to-day. Value-based leadership and clearly defined expectations encourage responsibility, respect and compliance with applicable laws, rules and internal regulations, especially in the following areas:



Compliance with law and ethical behaviour



Human rights and fair working conditions



Fair treatment, diversity and inclusion



Environmental and climate protection as well as ecological responsibility



Sustainability in the supply chain



Avoiding conflicts of interest



Prohibition of corruption and bribery



Fair and free competition



Occupational safety and health protection



Data protection and information security



Continuous improvement process



Whistleblower protection system and contact persons

Expertise of the administrative, management and supervisory bodies on business conduct matters

Members of the supervisory and management bodies contribute relevant expertise to the practical application of ethical standards within the LEAG group. Their experience supports the translation of governance objectives into operational practices, including fostering ethical awareness, strengthening due diligence in sensitive areas and supporting a compliance culture.

Ongoing development through tailored training programmes contributes to maintaining awareness of integrity and accountability across the organisation.



SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the DMA outlined in the section on material IROs, the following sub-topics related to G1 Business Conduct were identified as material:

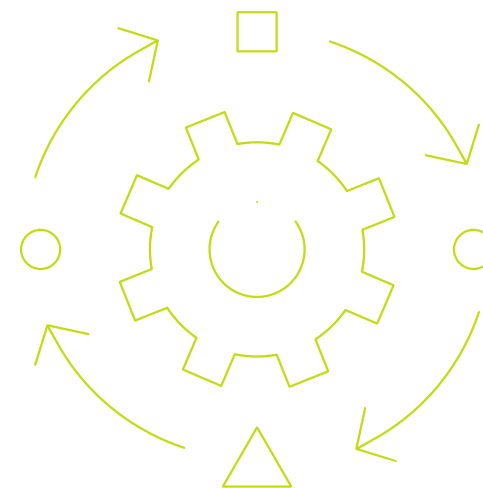
- Corporate culture
- Protection of whistleblowers
- Management of relationships with suppliers, including payment practices
- Political engagement
- Corruption and bribery

The description of the DMA is provided in ESRS 2, with additional details included to ensure clarity and comprehensiveness, primarily in SBM-3 and IRO-1.

Potential negative impacts and risks primarily arise from weaknesses in governance structures and processes, including insufficient integration of ethical standards into leadership practices, limited transparency, or gaps in the integration of ESG criteria into management and remuneration systems. In addition, weaknesses in non-financial risk management, data protection or cyber security may lead to operational disruptions, regulatory non-compliance, reputational damage and reduced stakeholder confidence. Further risks include inefficiencies in supplier management, challenges in maintaining innovation capacity and potential constraints on access to financing if ESG requirements are not fulfilled.

These risks are addressed through governance structures comprising policies, internal controls and risk management processes. Complementary measures include compliance and whistleblower mechanisms, standards for supplier management and payment practices. In addition, participation in industry associations and policy dialogue supports the exchange of best practices and early identification of regulatory developments. At the same time, consistent governance practices and engagement with responsible suppliers contribute to operational efficiency, resilience of business processes and long-term value creation.

These topics are closely linked to the Gigawatt division's business model, as they influence operational performance, stakeholder trust and access to capital.



G1-1

Business conduct policies and corporate culture

Corporate culture is a strategic foundation that enables responsible growth, risk mitigation, innovation and long-term stakeholder trust. Grounded in integrity and compliance, corporate culture is actively shaped by leadership, reinforced through daily operations and aligned with legal, societal and market expectations.

Policies related to business conduct and corporate culture

Policies and procedures relevant to responsible business conduct are defined at LEAG group level and form the overarching governance framework for the Gigawatt division. They apply to the group's operations in Germany and, where relevant, to international locations through equivalent or locally adapted approaches to ensure alignment with applicable legal and regulatory requirements. This framework establishes common principles and expectations that guide business conduct, with high standards of

integrity upheld in all operations as a key pillar of long-term success.

Within Germany, these principles are operationalised through a set of binding group policies and governance instruments. The **Code of Conduct** serves as the central reference point, which translates the LEAG group's corporate principles and mission statement into binding behavioural requirements applicable across a wide range of situations and contexts. In addition, the **Compliance Management System (CMS)** defines the organisational, procedural and control structures of the compliance framework and sets out the rules and processes to prevent, detect and address bribery and corruption, including clear limits and conditions for offering, granting, receiving or accepting gifts and invitations. The **CMS Policy** further governs the reporting of potential misconduct, defines the responsibilities of external ombudspersons and ensures the protection of whistleblowers against retaliation. In Germany, it also specifies the responsibilities of the internal reporting office under the Whistleblower Protection Act (HinSchG), including the communication of available reporting channels.

To strengthen legal compliance, the **Handling of Legal Matters Directive** establishes procedures, jurisdictions and cooperation mechanisms between the Legal/Insurance function and other organisational units. In addition, the **Regulatory Framework Guideline** supports legally compliant and operationally robust processes through clearly defined responsibilities and operational regulatory requirements.

LEAG Pellets GmbH is largely aligned with the LEAG group governance framework, including the application of key policies and systems, while certain processes are implemented at entity level in line with operational requirements and organisational structures.

For Scandbio AB, comparable principles are implemented through entity-specific governance frameworks. These include a dedicated Code of Conduct and locally defined policies, supported by an independent compliance system and certified management systems (e.g. ISO 14001, ISO 9001, FSC and SBP). Regular external audits are conducted to ensure compliance with applicable legal and regulatory requirements. These systems operate independently and are aligned with local regulatory frameworks.

The Gigawatt division operates within a highly regulated environment, including national and European energy legislation, permitting obligations and environmental standards, which are reflected in and shape the internal governance framework. Policies and procedures are regularly reviewed and updated to reflect evolving legal and ethical requirements.

For a detailed overview of the relevant policies, procedures and investigation mechanisms, please refer to ESRS 2 GDR-P section of this Report.

G1-4

Legal compliance – Mechanisms for identifying, reporting and investigating concerns

The Gigawatt division conducts its operations in accordance with applicable laws, regulations and internal guidelines, supported by structured compliance and risk management frameworks.

For companies in Germany, activities are underpinned by the LEAG group's risk-based **CMS**, which is continuously reviewed and further developed to reflect evolving legal and regulatory requirements. The CMS currently comprises, among other elements, an anonymous whistleblower system, a Compliance Committee and a central **Compliance function**, supported by decentralised compliance representatives or compliance officers at entity level. It also covers risk identification and assessment, determination of measures and controls, awareness-raising and training, as well as ongoing monitoring. Annual or occasion-specific reporting to management and supervisory bodies complement these measures. A layered set of mechanisms ensures that concerns are identified, escalated and addressed in a structured and timely manner. Compliance activities are supported through organisational structures at both group and entity level, with the central Compliance function monitoring relevant business and ESG-related risks

and coordinating the fulfilment of legal and regulatory obligations, including reporting requirements and topic-specific compliance activities.

LEAG Pellets GmbH is largely integrated into the LEAG group's compliance structures, including the CMS and related reporting mechanisms, while certain compliance processes are implemented locally.

For Scandbio AB, compliance management is organised through independent systems. These include dedicated legal compliance monitoring tools (e.g. WSP Legal Compliance Tool), entity-specific procedures and regular external audits. These systems operate independently and are aligned with applicable national regulatory requirements.

Supported by internal compliance regulations, the CMS fulfils three essential functions:

- **Prevention** – avoidance of misconduct and promotion of compliance-oriented behaviour
- **Detection** – uncovering misconduct
- **Reaction** – deriving measures to avoid misconduct in the future

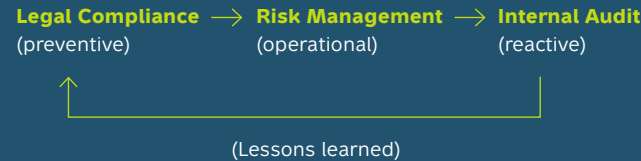


Figure 6: Legal compliance scheme

Risks management is integrated into the LEAG group's overall system for German entities and complemented by entity-specific approaches in other parts of the division. This ensures yearly systematic identification, assessment and monitoring of risks, as well as the implementation of mitigation measures and reporting in line with applicable legal and internal requirements.

Scandbio AB applies an ongoing and systematic approach to risk identification and prevention, supported by external monitoring, stakeholder dialogue, participation in industry associations and trend analyses to identify strategically relevant risks and opportunities. An overarching risk analysis covering operational, environmental and business-related risks is maintained and regularly updated based on stakeholder expectations and future trends.

The integration of ESG-related risks that are not yet fully quantified or monetised is currently being further developed.



Protection of whistleblowers

Whistleblower protection is ensured through structured reporting channels across the Gigawatt division, reflecting both group-level and entity-specific governance arrangements.

For entities within the LEAG group framework, whistleblower protection is ensured through group-wide reporting channels, allowing employees and external stakeholders to raise concerns or seek advice. These channels include, for example, a compliance hotline or dedicated e-mail address. Any concerns or suspicions of misconduct can be reported anonymously

through the incident reporting system (FS-PP BKMS® Incident Reporting) available via the ombudspersons. Further information on reporting options can be found on LEAG group's website²².

The designation and training of staff handling reports, as well as measures to protect whistleblowers from retaliation under Directive (EU) 2019/1937²³ and the German Whistleblower Protection Act, are defined within the **CMS**.

LEAG Pellets GmbH uses the LEAG group whistleblower system in combination with entity-specific processes. At Scandbio AB, a separate whistleblowing system is in place, operated by an external provider to ensure anonymity and confidentiality. Reports can be submitted without proof of suspicion, provided they are made in good faith, and are handled securely in accordance with defined procedures²⁴.

Across the division, reported concerns are assessed, investigated and reported depending on the assessment in line with defined procedures to ensure prompt, independent and objective handling of potential business conduct incidents, including corruption and bribery.

²² <https://www.leag.de/en/company/suppliers/>, please see section on "Corruption prevention"

²³ Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019L1937>

²⁴ <https://report.whistleb.com/en/scandbio>

Training on business conduct

The Gigawatt division promotes continuous learning through a structured business conduct training programme, reflecting both group-level and entity-specific approaches.

For **LEAG Renewables GmbH, LEAG Clean Power GmbH** and **LE Finance GmbH**, mandatory trainings on IT security, data protection and compliance are conducted at LEAG group level, typically via e-learning. Employees are required to participate at least once within a three-year cycle, for IT security yearly. Furthermore, the Compliance Officer of LEAG GmbH has the authority to mandate and conduct compliance-specific training as needed.

LEAG Pellets GmbH applies separate training formats, including instruction and documented acknowledgement of policies, rather than centrally tracked e-learning programmes. For Scandbio AB, training on anti-bribery, anti-corruption and data protection is delivered through entity-specific systems, such as local e-learning tools and internal training formats, independent from LEAG group training programmes.

The content, training participants and training cycles are determined according to the department and work tasks, which is further defined in the respective organisational guidelines.

Updated and new regulations are communicated through appropriate internal channels, including intranet-based systems where applicable or alternative communication formats depending on organisational structures.

Functions most at risk of corruption and bribery

The Gigawatt division aligns with the LEAG group's approach to identifying functions exposed to corruption and bribery risks. While a fully formalised assessment process has not yet been established, certain areas are recognised as inherently exposed to higher risk.



These include:

- Procurement and supplier management
- Contract negotiation and approvals
- Project development and investment decision-making

To further strengthen its risk-based **CMS**, the LEAG group is consolidating and formalising its approach to compliance risk assessment. Building on an initial compliance risk analysis, the CMS includes an ongoing, structured and transparently documented process to identify, assess and mitigate compliance risks.

This process informs decisions on the prioritisation of compliance risks, the identification of entities and business units with specific exposure and the determination of whether (potentially additional) compliance measures are required. The annual analysis and assessment of compliance risks are coordinated and overseen across the LEAG group by the **Compliance Officer** of LEAG GmbH. Risks are identified by the compliance officers at entity levels and subsequently coordinated or reported within the Compliance Committee.



Data privacy

Compliance with data privacy legislation is a key component of governance across the Gigawatt division. Business operations require the collection and storage of substantial amounts of data relating to employees, customers and business partners. Ensuring data security is therefore essential to comply with regulatory obligations and safeguard organisational integrity and reputation.

For entities within the LEAG group framework in Germany, data protection is embedded in the **Privacy Policy and the Rules on Conduct and Information Security**. Employees are regularly instructed on data protection obligations. In addition, all functions involving personal data handling must undergo training on a regular basis.

In other entities, including Scandbio AB, data protection and information security are implemented through local policies and systems in accordance with applicable national legislation and organisational requirements.

These approaches ensure that data security is maintained in line with regulatory obligations and supports the protection of organisational integrity and reputation.

Information processing

Information and communication technologies support the processing of business activities across the Gigawatt division. For entities integrated into the LEAG group systems, ICT functions are centrally managed and support operational processes through defined standards, regular system checks, data backups and continuous monitoring.

The **Powers of Attorney and Signature Authorisations Directive** defines the formal authorisation framework including signing authorities, digital signatures and the application of the four-eyes principle across relevant transactions and commitments to ensure appropriate control and oversight.

In other entities, IT systems and information processing are managed locally in accordance with organisational structures and regulatory requirements.

As part of Germany's critical infrastructure, the electricity-producing companies of the Gigawatt division operating in Germany fall within the scope of the German Act on Increasing the Security of Information Technology Systems, and required measures are being implemented accordingly.

G1-2

Actions related to business conduct

The Gigawatt division's approach to business conduct is anchored in the **Code of Conduct**, complemented by entity-specific frameworks, with actions designed both to enhance positive impacts and to mitigate risks across operations and the supply chain.

For **LEAG Renewables GmbH**, **LEAG Clean Power GmbH** and **LE Finance GmbH**, these actions are implemented through the LEAG group governance framework. Employee awareness is strengthened through structured training programmes, including additional e-learning modules on supply chain management. This training focuses particularly on purchasing functions and covers legal, human rights and environmental requirements related to responsible supply chain management under the German Supply Chain Due Diligence Act, with additional ESG modules planned for 2026.

Internal processes in these entities have been reinforced through updated purchasing procedures introduced in 2023 and the establishment of a risk management system addressing human rights and environmental risks across the supply chain, implemented as part of the LEAG group governance framework. A whistleblower system enables internal and external stakeholders to report risks or violations, triggering investigations, corrective measures and, where necessary, supplier audits or termination of business relationships. Supplier risks are monitored using dedicated tools such as the Integrity Next platform, which consolidates information on country and sector risks as well as supplier assessments, including questionnaires, certificates, site visits and performance indicators.

Human rights due diligence in the supply chain is supported through defined governance structures, including the Human Rights Officer, regular reporting and KPI tracking, as well as the Policy Statement on Respect for Human Rights. It is based on the requirements of the Supply Chain Due Diligence Act, which constitutes German national legislation and is therefore not directly applicable to entities operating outside Germany. Nevertheless, its principles support the systematic identification, assessment and mitigation of human rights and environmental risks across the value chain. In addition, the principles of the UN Global Compact are applied as supplementary guidance for partner companies and suppliers.

LEAG Pellets GmbH is largely aligned with these group-level approaches, including supplier governance and reporting mechanisms, while certain processes are implemented at entity level in line with operational requirements.

In other entities, particularly Scandbio AB, business conduct and supply chain responsibility are governed through entity-specific frameworks. These include a dedicated Code of Conduct, internal compliance procedures and certified management systems, supported by regular external audits. Supplier-related risks and compliance requirements are addressed through defined processes, aligned with applicable legal frameworks and market standards. The principles of ethical business conduct, including fair competition and anti-corruption, are embedded in these frameworks and guide responsible sourcing practices.



G1-4

Incidents of corruption or bribery

The Gigawatt division maintains a strict zero-tolerance approach to corruption and bribery, reinforcing its commitment to integrity and ethical business conduct across all operations, supported by both group-level and entity-specific frameworks.

For entities operating within the LEAG group governance framework in Germany, the **Compliance Management System Policy** is binding for all management and employees, establishing clear standards for preventing and responding to bribery, corruption and improper gifts or invitations. The policy equips employees with the tools to identify and escalate suspected money laundering in line with German legal requirements, while the **Antitrust and Competition Policy** safeguards fair market conduct by prohibiting anti-competitive agreements and improper behaviour across all jurisdictions in which the division operates. Tax compliance is ensured through the **Tax Management System**, which provides a governance framework for adherence to applicable tax laws in Germany.

In other entities within the Gigawatt division, particularly those operating outside Germany, comparable principles are implemented through local governance frameworks and policies in accordance with applicable legal and regulatory requirements, including areas such as tax, regulatory and compliance obligations.

In 2025, no convictions or fines related to breaches of anti-corruption or anti-bribery laws were recorded across the Gigawatt division. Furthermore, there were no public legal cases involving the companies of the division or their employees in connection with corruption or bribery.

- **No convictions or fines** were recorded for violations of anti-corruption or anti-bribery laws.
- **No disciplinary actions or dismissals** were necessary due to corruption-related incidents.
- **No business relationships** were **terminated or not renewed** due to violations related to corruption or bribery.
- No public legal cases concerning corruption or bribery were brought against the division or its employees in the current or preceding periods.

The Gigawatt division continues to uphold its anti-corruption framework across operations and the value chain. *For more details on the prevention and detection of corruption and bribery, please refer to the G1-1 section.*

G1-5

Political influence and lobbying activities

The LEAG group's **Code of Conduct** and the **Energy and Environmental Policy** govern all activities related to political engagement and lobbying for entities operating within the LEAG group governance framework in Germany.

Within this framework, political dialogue is primarily conducted through the **Public Affairs function** of the LEAG group. These activities include submitting statements on legislative proposals, contributing to association positions, participating in consultation processes and industry events, and engaging in direct dialogue with political decision-makers at both national and European levels.

LEAG GmbH is registered in the official lobby register with the registration number R002063²⁵. The publicly accessible information provided there offers transparency regarding the scope and nature of the advocacy activities, as defined by relevant legislation, including

those carried out on behalf of the Gigawatt division. None of the companies within the division is currently registered in a lobby register.

In other entities within the Gigawatt division, particularly those operating outside Germany such as Scandbio AB, political engagement and interaction with public authorities are managed locally in accordance with applicable national legal requirements and organisational structures, while the LEAG group's Code of Conduct continues to apply.

²⁵ Deutscher Bundestag: Lobbyregister LEAG GmbH, www.lobbyregister.bundestag.de/suche/R002063 (21.05.2026)

G1-6

Payment practices

In alignment with the commitment to transparency and fair business practices, comprehensive information is disclosed regarding payment practices, with a focus on preventing late payments to suppliers.

The Payment Transactions Directive defines principles and procedures for the approval, execution and documentation of payment processes, including incoming and outgoing payments as well as internal account movements. The scope covers all such payment processes carried out within LEAG GmbH and its direct and indirect subsidiaries in Germany, including cash payments, EDI/Multicash and SAP-based ERP payment processes, manual payment instructions, powers of attorney and also payment services performed for third parties under service level or similar agreements. For Scandbio AB, payment practices and transactions are conducted in accordance with applicable national legislative requirements in the respective jurisdictions of operation.

In 2025, the Gigawatt division recorded 6,705 payments²⁶, 84 % of which were aligned with the standard payment terms. There were no outstanding legal proceedings related to late payments. The consistent application of payment standards supports reliable financial processes and strengthens relationships with suppliers and partners.

²⁶ This counting does not include LEAG Pellets GmbH.

ANNEX

List of abbreviations

BESS	Battery energy storage systems
BImSchG	German Federal Emission Control Act (Bundes-Immissionsschutzgesetz)
BP	basis for preparation
B2B	business to business
CapEx	capital expenditures
CCGT	Combined Cycle Gas Turbine
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CHRO	Chief Human Resources Officer
CMS	Compliance Management System
CO	carbon monoxide
COO	Chief Operating Officer
CO ₂	carbon dioxide
CO ₂ eq	carbon dioxide equivalent
CSDDD	Corporate Sustainability Due Diligence Directive
CSRD	Corporate Sustainability Reporting Directive
DMA	double materiality assessment
EFRAG	European Financial Reporting Advisory Group
EPC	engineering, procurement and construction contract
EPH	Energetický a průmyslový holding
ESG	environmental, social and governance
ESRS	European Sustainability Reporting Standards
EEX	European Energy Exchange

EU	European Union
GDR-A	general disclosure requirements on actions
GDR-M	general disclosure requirements on metrics
GDR-P	general disclosure requirements on policies
GDR-T	general disclosure requirements on targets
GHG	greenhouse gas
GOV	Governance
H ₂	hydrogen gas
IROs	impacts, risks and opportunities
ISO	International Organisation for Standardisation
KPI	key performance indicator
NO ₂	nitrogen dioxide
NOx	nitrogen oxides
OCGT	open cycle gas turbine
OHS	occupational health and safety
OpEx	operational expenditures
PV	photovoltaic
QLEE	Lusatia Qualification Network for Renewable Energies
SBM	strategy and business model
SBP	Sustainable Biomass Program
SO ₂	sulphur dioxide
VOCs	volatile organic compounds

List of units

FTE	full time equivalent
GJ	gigajoule
GW	gigawatt
GWh	gigawatt hours
kV	kilovolt
mil	million
MW	megawatt
MWh	megawatt hour
MWp	megawatt peak
%	percent
#	number
tCO ₂	ton carbon dioxide
ha	hectare
€	euro

List of figures

7	Figure 1: Energy map of Gigawatt division.
8	Figure 2: Organisational structure of LEAG group and Gigawatt division, including the Gigawatt reporting scope, as of 31 December 2025.
14	Figure 3: LEAG target vision: business model 2030
28	Figure 4: Strategic positioning and ESG priorities
108	Figure 5: Breakdown of hazardous and non-hazardous waste by treatment method
146	Figure 6: Legal compliance scheme

List of tables

37	Table 1: Main aspects of the Gigawatt division's due diligence process
46	Table 2: Material topics
48	Table 3: ESRS-defined attributes and materiality calculation formulas
55–59	Table 4: Overview on policies and specifications
75	Table 5: CapEx in low-carbon projects (in mil €)
79	Table 6: Net installed electrical capacity (in MW)
80	Table 7: Electricity production (in GWh)
80	Table 8: Net installed capacity – Heat (in MW)
80	Table 9: Net heat production (in GJ)
81	Table 10: Energy consumption (in GWh)
82	Table 11: Energy intensity ratio (in GWh)
84	Table 12: GHG emissions
85	Table 13: Significant Scope 3 GHG emissions by category
92	Table 14: Significant air pollution during energy production
109	Table 15: Waste production
109	Table 16: Waste disposal
118	Table 17: Employee characteristics 01.01. – 31.12.2025
122	Table 18: Employees covered by collective bargaining agreements

List of pictures

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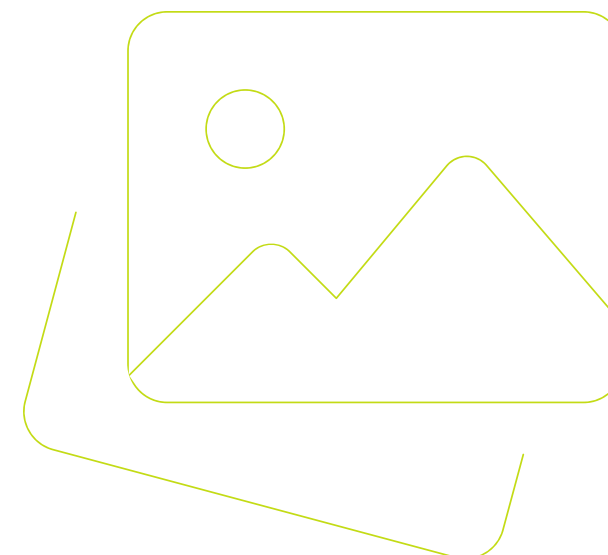
page 78: kftGALORE

Martin Klindtworth

page 43

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page 35, 75



Data tables

The following tables are intended to provide a better understanding of the way in which data was collected and compiled for this Report, based on the business activities of the Gigawatt division and the approach to data consolidation (including supporting notes).

Summary of notes related to data consolidation

Data table reference	LEAG Renewables GmbH	LEAG Clean Power GmbH	LEAG Biomass GmbH	LE Finance GmbH	Scope	Notes
Operational disclosures – business relating to electricity	✓	✓	✓			Material primarily to LEAG Renewables GmbH and LEAG Clean Power GmbH as the main electricity-related operating companies within the Gigawatt division.
Net installed capacity	✓	✓	✓		✓	Material primarily to LEAG Renewables GmbH and LEAG Clean Power GmbH as the entities developing, owning and/or operating electricity generation and storage assets.
Net power production	✓	✓	✓		✓	Material primarily to LEAG Renewables GmbH and LEAG Clean Power GmbH as the main electricity-producing companies within the Gigawatt division.
Net heat production			✓		✓	Material primarily to LEAG Biomass GmbH where business activities include the generation and supply of heat from biomass-based operations.
Innovation	✓	✓	✓	✓	✓	Material to all business activities of the Gigawatt division.
Energy consumption	✓	✓	✓		✓	Material primarily to LEAG Clean Power GmbH and LEAG Biomass GmbH due to energy use in generation, storage, processing and site operations.
Fuel consumption		✓	✓		✓	Material primarily to LEAG Clean Power GmbH and LEAG Biomass GmbH due to fuel use in flexible generation, process heat and related operational activities.
GHG emissions (Scope 1 and 2)	✓	✓	✓		✓	Material primarily to LEAG Clean Power GmbH and LEAG Biomass GmbH due to fuel combustion and purchased energy use, and also relevant to LEAG Renewables GmbH through purchased electricity consumption and limited direct emissions from operations.

Data table reference	LEAG Renewables GmbH	LEAG Clean Power GmbH	LEAG Biomass GmbH	LE Finance GmbH	Scope	Notes
GHG emissions (Scope 3)	✓	✓	✓	✓		Material across all companies within the Gigawatt division due to upstream and downstream value chain activities; coverage remains partial due to a focus on relevance and data limitations in categories such as waste and business travel.
Air pollution during energy production		✓	✓		✓	Material primarily to LEAG Biomass GmbH due to emissions such as dust, particulates, volatile organic compounds (VOCs) and nitrogen oxides (Nox) arising from biomass processing.
Waste production and disposal		✓	✓		✓	Material primarily to LEAG Biomass GmbH and LEAG Clean Power GmbH due to operational waste streams arising from biomass processing, maintenance and energy generation activities.
Employees	✓	✓	✓	✓	✓	Material to all business activities of the Gigawatt division. Employee totals are collected as FTE. Employees are broken down by managerial positions and other employees, thereby aligning with EPH reporting methodology, as it relates to data collection. Only an insignificant portion of activities is performed by workers who are not employees, therefore detailed information related to these individuals is omitted within this Report.
Employee turnover	✓	✓	✓	✓	✓	Material to all business activities of the Gigawatt division.
Occupational health and safety management system	✓	✓	✓	✓	✓	Material to all business activities of the Gigawatt division.
Work-related injuries and ill health	✓	✓	✓	✓	✓	Material to all business activities of the Gigawatt division.
Complaints	✓	✓	✓	✓	✓	Material to all business activities of the Gigawatt division.
Social investments	✓	✓	✓	✓	✓	Material to all business activities of the Gigawatt division.
Business conduct and fair practices	✓	✓	✓	✓	✓	Material to all business activities of the Gigawatt division.
Incidents relating to contracts	✓	✓	✓	✓	✓	Material to all business activities of the Gigawatt division.
Payments	✓	✓	✓	✓	✓	Material to all business activities of the Gigawatt division.
Financial resources allocation	✓	✓	✓	✓	✓	Material to all business activities of the Gigawatt division.

ESRS 2 – General disclosures

Executive members and non-executive members		2025
Executives – male	#	12
Executives – female	#	4
Executives – other	#	0
Number of executive members	#	16
Percentage of executives – male	%	75
Percentage of executives – female	%	25
Percentage of executives – other	%	0
Other employees – male	#	261
Other employees – female	#	69
Other employees – other	#	0
Number of non-executive members	#	330
Percentage of non-executives – male	%	79
Percentage of non-executives – female	%	21
Percentage of non-executives – other	%	0
Percentage of others – from total	%	95

Members of the supervisory body (LEAG GmbH)		2025
Males	#	10
Females	#	2
Other	#	0
Total number of members	#	12
Percentage of male	%	83
Percentage of female	%	17
Percentage of other	%	0
Total percentage of members	%	3

Gender diversity ratio of the Management Board (LEAG GmbH)		2025
Males	#	3
Females	#	0
Gender diversity ratio (average ratio of female to male)	%	0
Independent Board members	#	0
Independent Board members	%	0
Members – total	#	3

Revenue		2025 ²⁶
Revenue from PV	mil €	16
Revenue from wind	mil €	0
Revenue from battery	mil €	0
Revenue from biomass (sale of fuel products)	mil €	130
Other revenues	mil €	76
Total revenue	mil €	222

²⁶ Revenues refer to financial statements of LEAG Gigawatt GmbH for the period 3 to period 12 in 2025

E1 – Climate change

Significant CapEx

Significant CapEx		2025
For coal-related economic activities	mil €	n/a
For oil-related economic activities	mil €	n/a
For gas-related economic activities	mil €	0

Action plan – climate change mitigation

Financial resources allocated to action plan		Actual in 2025	Budget in 2025	Budget in 2026
CapEx	mil €	153	176	103
OpEx	mil €	8	7	8

GHG emissions (Scope 1,2,3)

		2025
Direct GHG emissions (Scope 1)	t CO ₂ eq	3,417
Indirect GHG emissions (Scope 2 – location-based)	t CO ₂ eq	50,812
Indirect GHG emissions (Scope 2 – market-based)	t CO ₂ eq	110,237
Indirect GHG emissions (Scope 3)	t CO ₂ eq	145,498
GHG emissions intensity, location-based (total GHG emissions per net revenue)	intensity	901

E1 – Energy

Net installed capacity – electricity

		2025
OCGT and other natural gas	MW	300
Total conventional sources	MW	300
Wind	MW	31
Photovoltaic	MW	110
Hydro	MW	n/a
Biomass	MW	4
Other	MW	n/a
Total renewable sources	MW	145
Total net installed electrical capacity	MW	445

Net installed capacity – heat

		2025
CCGT	MW	0
Biomass	MW	51
Oil	MW	20
Total net installed capacity – heat	MW	71

Net power production

		2025
CCGT	GWh	n/a
OCGT & other natural gas	GWh	2
Total conventional sources	GWh	2
Wind	GWh	6
Photovoltaic	GWh	98
Hydro	GWh	n/a
Biomass	GWh	18
Total renewable sources	GWh	122
Total net electricity production	GWh	124

Net heat production

		2025
CCGT	GJ	n/a
Oil	GJ	450
Total conventional sources	GJ	450
Biomass	GJ	598,745
Total renewable sources	GJ	598,745
Total net heat production	GJ	599,195

Energy consumption

Total energy consumption from fossil sources		2025
Lignite	GWh	n/a
Natural gas	GWh	6
Oil	GWh	0
Diesel	GWh	3
Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	GWh	87
Co-combustion	GWh	n/a
Total energy consumption from fossil sources	GWh	97
Renewable sources		2025
Wind	GWh	0
Photovoltaic	GWh	0
Biomass	GWh	520
Consumption of purchased or acquired electricity, heat, steam, or cooling from renewable sources	GWh	115
Total energy consumption from fossil sources	GWh	635
Total energy consumption from fossil and renewable sources	GWh	732
		2025
Total energy consumed	GWh	
Renewable sources in total energy consumption	%	87
Conventional sources in total energy consumption	%	13

CapEx in low-carbon projects

CapEx in low-carbon projects		2025
Storage solutions	mil €	10
Green H ₂ (production, storage, usage)	mil €	1
Flexible power plants / H ₂ -ready / power connections	mil €	14
Gas power plants	mil €	0
Wind and photovoltaic	mil €	144
Total CapEx in low-carbon projects	mil €	169

Action plan – Providing stable supply of energy

Financial resources allocated to action plan		Actual in 2025	Budget in 2025	Budget in 2026
CapEx	mil €	169	307	551
OpEx	mil €	1	2	1

E2 – Pollution

Significant air pollution during energy production

		2025
SO ₂ (sulphur dioxide) emissions	tonnes	0.1
NO _x (nitrogen oxides) emissions	tonnes	131.7
Dust emissions	tonnes	133.0
CO (carbon monoxide) emissions	tonnes	389.6
NO ₂ (nitrogen dioxide) emissions	tonnes	0
NO ₂ emissions	t CO ₂ eq	0
Total significant air emissions	tonnes	654,4
CO ₂ (carbon dioxide) emissions – fossil	tonnes	2,518.0
CO ₂ emissions – biogenic	tonnes	186,058.0
Total significant air emissions (incl. CO₂)	tonnes	189,230.4

E5 – Circular economy

Waste production

Waste production		2025
Non-hazardous waste	tonnes	2,967
Hazardous waste	tonnes	421
Total amount of radioactive waste	tonnes	n/a
Total waste production	tonnes	3,388

Waste disposal

Hazardous waste diverted from disposal		2025
Diverted from disposal due to recycling	tonnes	17
Diverted from disposal due to preparation for reuse	tonnes	0

Non-hazardous waste diverted from disposal		2025
Diverted from disposal due to recycling	tonnes	443
Diverted from disposal due to preparation for reuse	tonnes	0

Hazardous waste directed to disposal		2025
Directed to disposal by incineration	tonnes	0
Directed to disposal by landfilling	tonnes	403
Directed to disposal by other disposal operations (recycling)	tonnes	1

Non-hazardous waste directed to disposal		2025
Directed to disposal by incineration	tonnes	49
Directed to disposal by landfilling	tonnes	2,470
Directed to disposal by other disposal operations (recycling)	tonnes	5

Non-recycled waste		2025
Non-recycled waste	tonnes	2,922
Total waste generated	tonnes	3,388

S1 – Own workforce

Employees

All employees by position		2025
Total number of employees	FTE average	346
Executive members – total	FTE average	16
Percentage of male	%	75
Percentage of female	%	25
Percentage of other	%	0
Other employees – total	FTE average	330
Percentage of male	%	79
Percentage of female	%	21
Percentage of other	%	0
Percentage of managerial positions – from total	%	5
Percentage of others – from total	%	95

All employees by gender		2025
Ratio of male to female	ratio	3.76
Male employees – total	FTE average	273
Female employees – total	FTE average	73
Other	FTE average	0
Percentage of male – total	%	79
Percentage of female – total	%	21
Percentage of other – total	%	0

Employees by contract type		2025
Permanent contract	FTE average	333
Male		264
Female		69
Percentage of employees with a permanent contract	%	96
Temporary contract	FTE average	13
Male		10
Female		3
Other		0
Percentage of employees with a temporary contract	%	4

Non-employees in own workforce		2025
Number of non-employees in own workforce	FTE average	4
Number of non-employees in own workforce – self-employed people	FTE average	–
Number of non-employees in own workforce – people provided by undertakings primarily engaged in employment activities	FTE average	4
Percentage of non-employees in total workforce	%	1

Collective bargaining agreements		2025
Employees with collective bargaining agreements	FTE average	166
Percentage of employees with collective bargaining agreements	%	48
Employees in country (EEA) covered by workers' representatives	FTE average	68
Percentage of employees in country (EEA) covered by workers' representatives	%	20

Employee turnover

		2025
Number of leavers – total	FTE average	78
Employee turnover rate	%	23

Adequate wages

		2025
Employees paid below the applicable adequate wage benchmark	FTE average	0
Percentage of employees paid below the applicable adequate wage benchmark	%	0

Training and skill development

		2025
Employees that participated in regular performance career development reviews	FTE average	346
Percentage of employees that participated in regular performance and career development reviews	%	100
Training hours	#	38
Total employees	FTE average	346

Occupational health and safety management system

		2025
Number of all employees covered by health and safety management system	FTE average	346
Percentage of own workforce who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines	%	100

Work-related injuries and ill health

Number of fatalities		2025
Number of fatalities in own workforce as result of work-related injuries and work-related ill health	#	0
Number of fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites	#	0
Total number of fatalities	#	0
Number of recordable work-related accidents for own workforce	#	1
Number of cases of recordable work-related ill health of employees	#	0

Work-related ill health Employees		2025
Number of fatalities as a result of work-related ill health	#	0
Number of cases of recordable work-related ill health ²⁷	#	0
Number of days lost to work-related injuries and fatalities from work-related accidents	#	10

Family-related leave		2025
Employees entitled to take family-related leave	FTE average	346
Percentage of employees entitled to take family-related leave	%	100

²⁷ Number of inquiries from the employers' liability insurance association on reports of suspected occupational diseases (processing in accordance with §§191, 192 Sozialgesetzbuch, SGB VII).

Remuneration metrics

Gender pay gap		2025
Average pay level – male	€	54,160
Average pay level – female	€	59,303
Gender pay gap - percentage of the average pay level of male employees	%	109
Annual total remuneration ratio		
Annual total remuneration ratio of the undertaking's highest paid individual	ratio	4.01
Median employee annual total remuneration (excluding the highest paid)	€	79,516

Incidents of discrimination

		2025
Number of incidents of discrimination	#	0

Severe human right issues and incidents

		2025
Number of complaints filed to National Contact Points for OECD Multinational Enterprises	#	0
Amount of material fines, penalties and compensation for damages as result of violations regarding social and human rights factors	€	0

Social investments (donations, sponsorship, etc.)

		2025
Total monetary value contributed	mil €	0.03
Share made up by donations	mil €	0.02
Share made up by sponsorships	mil €	0.01
Other shares	mil €	0.00

G1 - Business conduct

Complaints

		2025
Number of complaints filed through channels for people in own workforce to raise concerns	#	0
Number of incidents of discrimination	#	0

Incidents

		2025
Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	#	0
Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	#	0
Number of confirmed incidents of corruption or bribery	#	0
Violation of anti-corruption and anti-bribery laws		
Number of convictions for violation of anti-corruption and anti-bribery laws	#	0
Amount of fines for violation of anti-corruption and anti-bribery laws	€	0

Payments

		2025
Payments aligned with standard payment terms ²⁸	#	5,635
Payments total ²⁹	#	6,705
Payments aligned with standard payment terms from total	%	84

Political contributions made

		2025
Financial political contributions made	mil €	0.01
In-kind political contributions made	mil €	0.00

²⁸ Number of on-time payments (earlier payment or on the due date) of order-related incoming invoices.

²⁹ Total number of order-related payments without down payments and without credits.

ESRS content index

ESRS 2/ Topical ESRS	Disclosure requirement	Name of the chapter	Pages
	ESRS 2 General disclosures		
BP-1	Basis for preparation of sustainability statements	BP-1, BP-2 – Basis for preparation of the sustainability statement and disclosures in relation to specific circumstances	15
BP-2	Specific information if the undertaking uses phasing-in options	BP-1 & BP-2 – Basis for preparation of the sustainability statement & disclosures in relation to specific circumstances	15
GOV-1	The role of the administrative, management and supervisory bodies in relation to sustainability	GOV-1 – Governance bodies	31
GOV-2	Integration of sustainability-related performance in incentive schemes	GOV-2 – Integration of sustainability-related performance in incentive schemes	36
GOV-3	Statement on due diligence	GOV-3 – Statement on due diligence	37
GOV-4	Risk management and internal controls over sustainability reporting	GOV-4 Risk management and internal controls over sustainability reporting	39
SBM-1	Strategy, business model and value chain	SBM-1 – Strategy, business model and value chain	18
SBM-2	Interests and views of stakeholders	SBM-2 – Interests and views of stakeholders	40
SBM-3	Interaction of material impacts risks and opportunities with strategy and business model, and financial effects	SBM-3 – Material impacts, risks and opportunities	44
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities	47
IRO-2	Material impacts, risks and opportunities and disclosure requirements included in the sustainability statement	IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement	51
GDR-P	General Disclosure Requirement for policies	GDR-P – Policies adopted to manage material sustainability matters	52
GDR-A	General Disclosure Requirement for actions and resources	GDR-A – Actions and resources in relation to material sustainability matters	60
GDR-M	General Disclosure Requirement for metrics	GDR-M – Metrics in relation to material sustainability matters	62
GDR-T	General Disclosure Requirement for targets	GDR-T – Tracking effectiveness of policies and actions through targets	64

ESRS 2/ Topical ESRS	Disclosure requirement	Name of the chapter	Pages
	ESRS E1 Climate Change		
E1-1	Transition plan for climate change mitigation	E1-1 Transition plan for climate change mitigation	70
E1-2	Identification of climate-related risks and scenario analysis	E1-2 Identification of climate-related risks	76
E1-3	Resilience in relation to climate change	E1-3 Resilience in relation to climate change	77
E1-4	Policies related to climate change mitigation and adaptation	GDR-P – Policies adopted to manage material sustainability matters	52
E1-5	Actions and resources in relation to climate change mitigation and adaptation	E1-5 Transition actions and implementation roadmap	73
E1-6	Targets related to climate change	GDR-T – Tracking effectiveness of policies and actions through targets	64
E1-7	Energy consumption and mix	E1-7 Energy consumption mix	79
E1-8	Gross Scope 1, 2, 3 GHG emissions	E1-8 Metrics related to climate change	83
E1-9	GHG removals and GHG mitigation projects financed through carbon credits	not applicable	–
E1-10	Internal carbon pricing	not applicable	–
E1-11	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	not applicable	–
	ESRS E2 Pollution		
E2-1	Policies related to pollution	GDR-P – Policies adopted to manage material sustainability matters	52
E2-2	Actions and resources related to pollution	E2-2 Actions related to pollution	89
E2-3	Targets related to pollution	GDR-T – Tracking effectiveness of policies and actions through targets	64
E2-4	Pollution of air, water and soil	E2-4 Metrics related to dust and other emissions	91
E2-5	Substances of concern and substances of very high concern	not material	–

ESRS 2/ Topical ESRS	Disclosure requirement	Name of the chapter	Pages
	ESRS E3 Water and marine resources		
E3-1	Policies related to water	not material	–
E3-2	Actions and resources related to water	not material	–
E3-3	Targets related to water	not material	–
E3-4	Water metrics	not material	–
	ESRS E4 Biodiversity and ecosystems		
E4-1	Biodiversity and ecosystems transition plan	E4-1 – Transition plan and consideration of biodiversity in strategy and business model	97
E4-2	Policies related to biodiversity and ecosystem	GDR-P – Policies adopted to manage material sustainability matters	52
E4-3	Actions and resources related to biodiversity and ecosystem	E4-3 Actions related to biodiversity	99
E4-4	Targets related to biodiversity and ecosystems	GDR-T – Tracking effectiveness of policies and actions through targets	64
E4-5	Metrics related to biodiversity and ecosystems change	E4-5 Metrics related to biodiversity	101
	ESRS E5 Circular economy		
E5-1	Policies related to resource use and circular economy	GDR-P – Policies adopted to manage material sustainability matters	52
E5-2	Actions and resources related to resource use and circular economy	E5-2 – Actions related to resource use and circular economy	105
E5-3	Targets related to resource use and circular economy	GDR-T – Tracking effectiveness of policies and actions through targets	64
E5-4	Resource inflows	E5-4, E5-5 – Metrics related to resource use and circular economy	107
E5-5	Resource outflows	E5-4, E5-5 – Metrics related to resource use and circular economy	107

ESRS 2/ Topical ESRS	Disclosure requirement	Name of the chapter	Pages
	ESRS S1 Own workforce		
S1-1	Policies related to own workforce	GDR-P – Policies adopted to manage material sustainability matters	52
S1-2	Engagement with own workforce and workers' representatives, existence of channels for own workforce to raise concerns or needs and approaches to remedy	S1-2 – Engaging with own workforce and business model	114
S1-3	Actions and resources related to own workforce	S1-3 – Actions related to own workforce	116
S1-4	Targets related to own workforce	GDR-T – Tracking effectiveness of policies and actions through targets	64
S1-5	Characteristics of the undertaking's employees	S1-5 – Employee characteristics	118
S1-6	Characteristics of non-employees in undertaking's own workforce	S1-6 – Non-employee characteristics	119
S1-7	Collective bargaining coverage and social dialogue	S1-7, S1-10 – Social protection and collective bargaining agreements	122
S1-8	Diversity metrics	S1-8 – Diversity metrics	120
S1-9	Adequate wages	S1-9, S1-15 – Remuneration metrics and adequate wages	126
S1-10	Social protection	S1-7, S1-10 – Social protection and collective bargaining agreements	122
S1-11	Persons with disabilities	not material	–
S1-12	Training and skills development metrics	S1-12 – Training and skill-development	120
S1-13	Health and safety metrics	S1-13 – Health and safety	123
S1-14	Work-life balance metrics	S1-14 – Work-life balance metrics	125
S1-15	Remuneration metrics	S1-9, S1-15 – Remuneration metrics and adequate wages	126
S1-16	Incidents of discrimination and other human rights incidents	S1-16 – Incidents and complaints	127
	ESRS S2 Workers in the value chain		
S2-1	Policies related to workers in the value chain	GDR-P – Policies adopted to manage material sustainability matters	52
S2-2	Engagement with workers in the value chain, existence of channels for workers in the value chain to raise concerns or needs and approaches to remedy	S2-2 Engaging with workers in the value chain	130
S2-3	Actions and resources related to workers in the value chain	S2-3 – Actions related to workers in the value chain	131
S2-4	Targets related to workers in the value chain	GDR-T – Tracking effectiveness of policies and actions through targets	64

ESRS 2/ Topical ESRS	Disclosure requirement	Name of the chapter	Pages
	ESRS S3 Affected Communities		
S3-1	Policies related to affected communities	GDR-P – Policies adopted to manage material sustainability matters	52
S3-2	Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	S3-2 – Engaging with affected communities	134
S3-3	Actions and resources related to affected communities	S3-3 – Actions related to affected communities	135
S3-4	Targets related to affected communities	GDR-T – Tracking effectiveness of policies and actions through targets	64
	ESRS S4 Consumers and end-users		
S4-1	Policies related to consumers and end-users	GDR-P – Policies adopted to manage material sustainability matters	52
S4-2	Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	S4-2 – Engaging with consumers and end-users	138
S4-3	Actions and resources related to consumers and end-users	S4-3 – Actions related to consumers and end-users	139
S4-4	Targets related to consumers and end-users	GDR-T – Tracking effectiveness of policies and actions through targets	64
	ESRS G1 Governance		
G1-1	Policies related to business conduct	G1-1 – Business conduct policies and corporate culture	145
G1-2	Actions related to business conduct	G1-2 – Actions related to business conduct	150
G1-3	Targets related to business conduct	GDR-T – Tracking effectiveness of policies and actions through targets	64
G1-4	Metrics related to corruption or bribery	G1-4 Incidents of corruption or bribery	151
G1-5	Metrics related to political influence, including lobbying activities	G1-5 – Political influence and lobbying activities	152
G1-6	Metrics related to payment practices	G1-6 – Payment practices	152

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