



POWER IS KNOWLEDGE

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GROUP SUSTAINABILITY POLICY

ALIGNED WITH ISO 26000



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1 Purpose

Sunlight Group is committed to responsible business conduct that contributes to sustainable development, in line with the principles and core subjects of **ISO 26000:2010**. Our mission is to deliver innovative energy storage solutions while protecting the environment, respecting human rights, supporting our people and communities, and upholding ethical governance across all operations in Greece and Italy.

We identify, assess, and manage our ESG impacts, risks, and opportunities (IROs) across our operations and value chain through a structured Double Materiality Assessment (DMA) process, ensuring that our sustainability priorities are aligned with both business performance and stakeholder expectations.

This Policy applies to all employees, contractors, subsidiaries, and business partners.

2 Guiding Principles (ISO 26000)

Sunlight Group integrates the seven ISO 26000 principles into its strategy and operations:

- **Accountability** for environmental, social, and governance impacts
- **Transparency** in ESG performance and decision-making
- **Ethical behavior** across all business activities
- **Respect for stakeholder interests**
- **Respect for the rule of law**
- **Respect for international norms of behavior**
- **Respect for human rights**

3 Core Commitments Across ISO 26000's Seven Subjects

3.1 Organizational Governance

We maintain a robust ESG governance structure that ensures effective oversight, decision making, and accountability. The Board of Directors reviews ESG performance, approves targets, and ensures alignment with international standards. The ESG Management Committee coordinates implementation across all departments.

ESG criteria are systematically integrated into key business decision-making processes, including strategic planning, capital investments, procurement, product development, and risk management, to ensure long-term value creation and responsible growth.

3.2 Human Rights

Sunlight Group is committed to respecting and promoting internationally recognized human rights, including the UN Guiding Principles on Business and Human Rights.

We commit to:

- Conduct **human rights due diligence** to identify, prevent, and mitigate risks
- Maintain accessible **grievance mechanisms** for employees, suppliers, and communities

- Prevent discrimination, harassment, and forced or child labor
- Protect freedom of association and collective bargaining
- Ensure privacy and data protection for employees, customers, and partners
- Assess suppliers for human-rights risks and require adherence to our Supplier Code of Conduct

3.3 Labor Practices

We foster a safe, inclusive, and fair workplace.

Our commitments include:

- Zero accident culture supported by continuous training
- Equal opportunities and DEI initiatives, aiming for 20% representation of underrepresented groups by 2028
- Fair wages, benefits, and working conditions
- Employee development through training on labor rights and professional skills
- Increasing employee satisfaction by 5% by 2030

3.4 Environment

Sunlight Group actively addresses climate change and environmental protection.

We commit to:

- Reduce GHG emissions by 40% by 2030 and achieve climate neutrality by 2050
- Reduce Scope 3 emissions 5% by 2032
- Implement lifecycle analysis (LCA) for products
- Achieve nearly 100% water recycling by 2030
- Maintain Zero Liquid Discharge (ZLD) in recycling operations
- 90% of recycled content of lead acid by 2030 supporting our Circular Economy model
- Minimize waste through lean manufacturing and circular economy practices

3.5 Fair Operating Practices

We conduct business ethically and responsibly.

Our commitments include:

- Zero tolerance for corruption, bribery, fraud, and conflicts of interest
- Annual ethics and anti-fraud training for all employees
- Compliance with Greek, EU, and US regulations
- Fair competition and responsible marketing practices

- Responsible political involvement and transparent advocacy
- Promotion of ESG awareness and compliance across the supply chain

3.6 Consumer Issues

We ensure that our products and services are safe, reliable, and responsibly marketed.

We commit to:

- Maintain zero product recalls related to health and safety
- Provide accurate, transparent product information
- Protect consumer data and privacy
- Ensure responsible end of life management and recycling options
- Integrate product lifecycle responsibility principles, including sustainable design, durability, reparability, and recyclability
- Establish and maintain customer feedback mechanisms to continuously improve product quality, safety, and performance
- Promote responsible product use through clear guidance, technical support, and safety instructions for customers

3.7 Community Involvement and Development

Sunlight Group supports the social and economic development of local communities.

We focus on:

- Education and vocational training
- Emergency response and essential needs
- Local community development projects
- Employee volunteering programs
- Partnerships with NGOs, schools, and local authorities

4 Stakeholder Engagement & Materiality

Sunlight Group maintains open, continuous dialogue with stakeholders including employees, customers, suppliers, shareholders, communities, NGOs, and regulators.

We commit to:

- Conduct regular stakeholder surveys, site visits, and consultations
- Implement a structured Double Materiality Assessment (DMA) process to systematically identify, assess, and prioritize ESG impacts, risks, and opportunities (IROs) across our operations and value chain.

- Integrate stakeholder feedback into strategic planning and reporting

5 Implementation & Monitoring

- ESG virtual team coordinate implementation within each department
- Internal Audit evaluates the effectiveness of ESG controls
- Legal & Compliance monitors regulatory developments
- Finance & Marketing Division tracks progress and reports to the Management Committee
- ESG performance is disclosed transparently through assessments, ratings, and public reporting

Our Group continuously monitors ESG performance against defined targets and KPIs and implement corrective and preventive actions where needed. This ensures ongoing improvement, strengthens accountability, and supports the adaptation of our strategy to evolving risks, regulatory requirements, and stakeholder expectations.

6 Review & Communication

This Policy is reviewed every two years and approved by the ESG Management Committee. It is communicated to all employees, suppliers, and stakeholders and published on the Group's official website.



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