



EUROPEAN
ENERGY

Stakeholder Engagement Policy

Document Owner: Local Engagement,
Communications

Classification: Topic Specific Policy

22 August 2025





Contents

Purpose 4

Governance 5

Scope of Application..... 5

Principles and concepts for meaningful engagement..... 6

Our approach to stakeholder engagement..... 7

Document History

Version	Date	Change description	Change by	Document Author (prepared by)	Document Owner	Document/Change Approver
1.0	August 22 nd 2025			Nanna Bonde	Local Engagement / Communication	LT

[Document History must be included in all internal available policies. Above table can be used or similar one. Items highlighted in yellow should always be included. If policies should be made available externally, the detailed Document History should not be included in the external version but must be included in the internal version. Date, Document Approver and Version should always be stated in an external version.]

Purpose

At European Energy, we envision a world powered by renewable energy. As we develop an increasing number of renewable energy projects worldwide, we interact with a growing number of stakeholders, including individuals, groups and communities. Our success in accelerating the green transition relies on earning the trust and support of our stakeholders. To ensure a just and fair transition, European Energy has embedded stakeholder engagement as a core element of its project management model with special attention to impacted communities as a key stakeholder group. This approach fosters meaningful dialogue with affected stakeholders,¹ delivers shared value through sustained long-term commitments, and shapes resilient projects.

In these efforts, we are committed to upholding international standards such as the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the International Finance Corporation's Performance Standards on Environmental and Social Sustainability. In markets where our activities affect indigenous peoples, we are committed to upholding the principles of the UN Declaration on the Rights of Indigenous Peoples and adhering to the International Labour Organization's Convention on Indigenous and Tribal Peoples (ILO No. 169) as far as possible under the law. This includes engagement that respects their rights, culture, and traditional knowledge, seeking Free, Prior, and Informed Consent (FPIC) before undertaking activities that may impact their lands, resources, cultural heritage or self-determination.

This Policy outlines European Energy's framework of principles and strategy for engagement with stakeholders to ensure a consistent approach to addressing impacts, risks, and opportunities through ongoing environmental and human rights due diligence at project-level across our various markets.



¹ Affected stakeholders are individuals, groups, or communities who experience actual or potential positive or negative impacts from a project's activities, regardless of their level of influence over the project.

Governance

The Sustainability Committee validates European Energy's policies covering environmental, social, and ethical issues and recommends these for the approval of the Board of Directors. It also monitors the Sustainability Strategy, including the Community Engagement Programme,² and oversees the company's performance and progress on key sustainability objectives.

European Energy's Board of Directors, supported by the Sustainability Committee, discusses recommendations from the Sustainability Committee on risks and opportunities associated with implementing the Sustainability Strategy.

Project Development, Engineering, Construction & Procurement (EPC), and Asset Management departments are responsible for implementing the Stakeholder Engagement Policy in accordance with European Energy's Project Management Model.



² The Community Engagement Programme is one of EE's Sustainability Workstreams under the Social Pillar of the Sustainability Strategy.

Scope of Application

A stakeholder is defined as an individual or group who is potentially affected by or can influence a project and/or its outcomes.

Throughout the project lifecycle, European Energy engages with various stakeholder groups and individuals at both national, regional and local levels. That includes stakeholders who may politically, locally and/or socially influence the success of the project, who may be impacted by decisions and activities within the project, or who may have an interest in the project. The company's stakeholders include, but are not limited to, local communities, civil society organizations, landowners, indigenous peoples, and national and local authorities.

Our Stakeholder Engagement Plans are adapted to the local context and pay particular attention to those affected by the project, especially vulnerable groups who may not express their concerns as readily.

Project managers across all our markets must regularly ensure that stakeholder mapping is conducted and reviewed, as part of the Stakeholder Engagement Plan, to avoid exclusion of affected or influential stakeholders. The review process should identify and address emerging risks and impacts as views, needs, and priorities of individuals and communities evolve.

The policy is applicable for all our projects. Our Code of Conduct for Business Partners outlines the expectations for how our business partners should engage with stakeholders.

Principles and concepts for meaningful engagement

Our approach to stakeholder engagement is grounded in principles that emphasize inclusivity and ongoing collaboration between company representatives and affected stakeholders, while ensuring that such engagement also supports EE's long-term commercial viability and value creation. This involves a wide range of activities and interactions throughout the project's lifecycle. The key elements include:

- **Stakeholder Identification and Analysis:** Identify stakeholders, assess their interests and concerns, and prioritize them appropriately.
- **Transparent Communication:** Share meaningful and accessible information with stakeholders in the decision-making process and maintain transparency throughout the project's lifecycle.
- **Inclusive Consultation:** Plan and execute an inclusive, respectful and culturally appropriate consultation process, document stakeholder interactions, and provide clear communication on follow-up actions.
- **Good-Faith Negotiations:** Engage in good-faith, fair and constructive negotiations that meaningfully consider the interests of all parties, striving to ensure equitable participation and, to the best extent possible, a level playing field, particularly for those most vulnerable.
- **Grievance Mechanisms:** Strive to establish accessible and effective channels for stakeholders to raise concerns or grievances safely throughout the project's duration. Monitoring and reporting activities should aim to help project staff assess the effectiveness of the grievance mechanism, identify recurring issues, and address problems proactively. Where adverse impacts has been caused or contributed to, access to remedy should be provided to the greatest extent possible.
- **Monitoring and Stakeholder Involvement:** Monitor impact mitigation plans and engage stakeholders to enhance transparency and build trust, including evaluating effectiveness from the perspective of affected individuals and communities.

This involves assessing whether communities have been heard, how trust has been built, and if their views have influenced project decisions.

- **Ongoing Reporting:** Regularly report back to stakeholders on environmental and social performance, impact mitigation, and how their input has been used, ensuring follow-up with communities after engagement activities to provide feedback, addressing both those directly affected and broader interested parties.

By adhering to these principles, European Energy ensures that stakeholder engagement is meaningful and recognized as integral to the project's success.



Our approach to stakeholder engagement

To standardize its stakeholder engagement, European Energy has incorporated it into the company's Project Management Model, ensuring that the key principles for meaningful engagement are upheld throughout the entire lifecycle of every project. A key element is to initiate engagement early in the project to allow for meaningful discussions on design options, ensuring that the impacts of each choice on the distinct groups involved are clearly explained, and incorporating feedback as part of the decision-making process.

Each project phase presents different environmental and social risks and opportunities, requiring distinct stakeholder engagement practices tailored to the specific circumstances of that phase. These practices are integrated into our project-level management systems that also cover planning for relevant community health & safety, land acquisition and resettlement impacts, as well as livelihood restoration, if applicable. Our methodology allows us to customize and refine engagement strategies to meet the needs of local stakeholders while addressing the environmental and social risk landscape of each project.

To ensure effectiveness and consistency across all markets, European Energy has defined gate requirements between project phases, and a practical, step-by-step guidance outlined in our Stakeholder Engagement Procedure. This procedure guides all engagement activities and facilitates the implementation of tailored strategies through practical tools, including:

- Mapping stakeholders and analysing their influence on, and vulnerability to, the project's activities, prioritizing those most affected for engagement
- Planning engagement activities on prioritized issues of those affected, scaled according to impact screenings and assessments

- Monitoring dialogue through consultation logging and ensuring commitments are registered for follow-up
- Establishing grievance mechanisms and providing guidance on remediation processes

Documenting consultation activities and outcomes is a critical element of the stakeholder engagement process. Comprehensive records support effective management of engagement and enable European Energy to demonstrate how perspectives of affected individuals and influential stakeholders have been incorporated into the project's environmental and social mitigation strategies, focusing on prevention where possible. These records provide the foundation for reporting back to stakeholders on how their input has been addressed.

Building internal capacity is essential to our approach, ensuring that we cultivate and maintain the resources and expertise needed to manage stakeholder engagement processes effectively. European Energy is equally committed to fostering employee engagement by emphasizing the value that stakeholder dialogue brings to its operations. This commitment is reflected in our plan to develop targeted training programs aimed at equipping employees with the skills and knowledge needed to effectively engage with key players in their local context.

For more information on the Stakeholder Engagement Procedure and training programs, please contact Local Engagement in the Communication Department, localengagement@europeanenergy.com.

A handwritten signature in blue ink, appearing to read 'Knud Erik Andersen'.

Knud Erik Andersen