



Environmental Management System – Eneo Solutions

OVERVIEW ON HOW WE UPHOLD ENVIRONMENTAL SUSTAINABILITY IN OUR DELIVERIES WITHIN LOCAL RENEWABLE ENERGY

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ENVIRONMENTAL MANAGEMENT FOR ENEO SOLUTIONS

This day, 07/07/2016, the following documents have been prepared for Eneo Solutions AB and affiliated companies. The document has been revised 2019-01-11.

Preface

Eneo Solutions AB was founded in 2013 with an aim to lead society towards renewable energy solutions. We do this by offering our customers renewable energy solutions and consulting services of various types within geo- and solar energy.

This report targets our customers and employees. The purpose of the report is to describe the company's sustainability efforts based on key sectors, structure, environmental goals and division of responsibility. The document will be revised annually.

This document is based on ISO 14001 and is a step towards becoming certified.

ENVIRONMENTAL IMPACT

Eneo's environmental impact is mainly derived from our external operations, i.e. construction of facilities for local energy production. In this respect, we apply procurement-type turnkey contracts. Through the tender process and documentation, Eneo sets requirements regarding environmental performance. It is an opportunity that should be used, but which can be difficult to monitor.

The second area in which we have an environmental impact comes from our internal operations, mainly from our office and from transportations. The choice of products used in the internal operations, ways of utilizing the office and the number and choice of transport vehicles are sectors that have been identified as significant impact.

ENVIRONMENTAL POLICY

Eneo should be a symbol for sustainable development. We strive for continuous improvements by carrying out our efforts systematically and structurally. These efforts should be as visible in our internal activities as in our external work procedures.

ENVIRONMENTAL MEASURES TAKEN

Eneo's environmental sustainability efforts are carried out internally and externally; in the work we carry out with our customers, suppliers and other stakeholders within our service contributions as well as in our everyday operations such as the products and solutions we choose for office and transport.

ENVIRONMENTAL POLICY	ACTION PLAN
<i>EXTERNAL</i>	
<p>We aim to be a frontrunner in offering our customers the best solar and geo-energy facilities from a life-cycle perspective.</p>	<p>Eneo will, in its selection process of suppliers within construction, hardware and operations & maintenance, set requirements for active environmental work and environmentally sustainable components. This may concern environmental plans, waste management, environmental labels, carbon dioxide imprints on components, etc. These requirements must be stated in the tender documentation.</p> <p>In the management of facilities, Eneo will choose resource-efficient solutions and strive for continuous improvements. Everything from remote monitoring to minimize transport needs to replacing faulty technology when it is environmentally and economically justifiable. This is included in the job description for Asset manager.</p>
<p>Our institutional partners in financing should have a profile that is environmentally appropriate for Eneo.</p>	<p>For us and our customers, it is important that the owners of the facilities, i.e. the investors in Eneo's project portfolios have a profile in environmental issues that is congruent with Eneo's environmental policy. In connection with the acquisition of capital, investors must be evaluated based on an environmental perspective.</p>
<p>Laws, regulations and other requirements that apply to the business must be followed.</p>	<p>In all cases where we in our projects are subject to laws and regulations in the environmental field (eg drilling permits, exemptions from water protection regulations, refrigerant control), we as part of the project plan must have a clear plan for how we ensure compliance.</p>
<p>Changes in laws, regulations and other requirements that affect the business shall be monitored in an ongoing basis.</p>	<p>Our Legal Department shall continuously monitor changes in the environmental sector that affect Eneo's operations. Updates in laws or regulations that affect our operations, should be integrated into tender documentation and other</p>

	guidelines to suppliers. Similarly, we shall update recommendations to customers on how they should act in environmental issues.
<i>INTERNAL</i>	
With the internal environmental work, we shall minimize our environmental impact.	We will maintain awareness amongst our staff about the importance of commitment and knowledge about our internal sustainability efforts. Skills development can take place, for example in the form of internal training and informal exchange of opinions and knowledge.
We shall continuously disseminate knowledge internally about which environmental laws and regulations are applicable to Eneo's operations.	We will conduct training sessions with our staff on how to comply with applicable laws and regulations in the execution of projects and give customers applicable recommendations.
We will strive to minimize our use of resources in the workplace.	We shall strive to minimize the use of resources that have an environmental impact. Workplaces and premises must be environmentally friendly and economical with energy and resources. Services and products purchased by the company, eg in terms of office equipment, energy supply, interior design, lighting and consumables, it must be environmentally adapted with a resource-efficient product production. We will also prioritize the purchase of organic foodstuffs at internal events. Waste must be handled in line with the waste hierarchy.
We will strive to minimize resource-intensive transport.	E-meetings shall, as far as possible, replace physical meetings where transportation is necessary. Travel and transport should as far as possible be done with environmentally friendly alternatives to minimize climate impact, eg. public transportation rather than car or airplane.
We will donate money to projects that have an environmental profile instead of physical gifts to customers and employees.	As a gift and greeting to customers and suppliers in connection with celebrations, Eneo shall donate money to environmentally sustainable projects in line with the company's activities, eg. climate-compensating measures or installation of solar cells or other environmental technologies in developing countries.

Requirements for procurement

To map out the environmental impact of one of Eneo's solar cell installations, a model for life cycle analysis has been developed. The life cycle analysis showed that the environmental impact of a photovoltaic plant primarily arises during material extraction and the production of solar cell modules. The choice of modules and manufacturers is therefore of great importance in minimizing the environmental impact of a plant. A corresponding model for life cycle analysis will be carried out for geo energy.

Procurement Procedures (including self-checking)

When procuring solar cell installations, the modules are required to be rated at least “Average” in Silicon Valley Toxic Coalition (SVTC) Solar Scorecard or equivalent. SVTC Solar Scorecard is a system where the modules are graded based on its environmental and social sustainability. This is ensured when bidding and when inspecting when a visual check is made.

When procuring both solar cell and geo-energy plants, requirements are also set for contractors to report their environmental management system.

The fact that all documents requested in the tender documentation are received is secured by a checklist.

We also make a life-cycle analysis with our proprietary model for mapping the environmental impact caused by the hardware and transports that are included in the supplier's tender. A number of environmental key figures are produced that both Eneo and the customer can use in their communication about the project.

Handling of deviations and preventative measures

Deviations that occur are documented in the project documentation and taken up with the contractor during the inspection.

Information regarding the company's deviation is made at weekly reconciliations and during the meeting that is held prior to the start of installation in each project.

ENVIRONMENTAL GOALS

Eneo's primary environmental goal is to increase the carbon dioxide offset each year (i.e. the reduction of carbon dioxide equivalents that the establishment of Eneo's solar cell and geo-energy plants gives rise to compared to customers' alternative energy supply) compared with the previous year. Every year we estimate the offset volume and include it in annual reports and communication to different target groups.

LEGAL REQUIREMENTS

Laws, regulations and other requirements that are applicable to the activities in the environmental area must be followed. Eneo's work is currently affected by several laws in this sector.

- Drilling permits are typically required in each municipality where the energy wells are to be drilled
- Refrigerant control shall, in applicable cases, be carried out according to the Swedish Ordinance (2007: 846) on fluorinated greenhouse gases and ozone-depleting substances.

ONGOING KNOWLEDGE DISIMENIATION

Having an overview of applicable laws and regulations within the environmental area is an integral part of Eneo's business model. Our ambition is to be a knowledge leader in this area of the market. Our customers expect Eneo to always act in accordance with laws and regulations and to inform them about changes in laws and regulations that affect plants or Eneos and the customer's actions, e.g. regarding reporting to authorities and application for various forms of support systems.

Internally, Eneo has a Head of Legal who regularly monitors the work of the Riksdag and the authorities on changes to laws and regulations in the environmental field. Correspondingly, Eneo's project managers compile information on the actions of various municipalities and county administrative boards regarding the handling of permits in the environmental area (i.e. drilling permits, refrigerant control and water protection regulations). This knowledge is continuously integrated into Eneo's sales process and in tender documents and is discussed at regular intervals throughout the company in workshops. (See also Eneo's environmental policy above.)

OWNERSHIP AND FOLLOW UP PROCEDURES

Ownership in management

The CEO is responsible for ensuring that employees are informed about what the policy entails and to keep staff informed when new guidelines are developed. The CEO is also responsible for giving the staff the opportunity to comply with the policy. Overall, employees should be encouraged to contribute to creative solutions in the environmental field. It is with the guidance of the CEO that the document is revised annually. The CEO together with the rest of the management team takes responsibility for the establishment, implementation, follow-up and revision of the environmental management document. The management at Eneo shall ensure that the environmental management document is relevant to Eneo's business area;

- Show leadership and commitment to the document and encourage employees to make continuous improvements;
- Responsibilities within implementation and systematic follow-up are assigned appropriate roles and communicated within the organization.

Support and evaluation

Ensuring that our work is carried out sustainably requires continuous work and monitoring. We ensure that our work force monitor the skills and resources on environmental issues and raise the question

during each annual review to ensure efficiency. If other types of resources or competencies are requested, the issue should be discussed with management team within Eneo.

Prior to the annual revision of the document, appropriate time should be devoted to evaluating the organisation's environmental work. Between the annual revisions of the environmental document, the responsible person shall monitor and analyze the work that is carried out continuously during the year. The responsible person should also take the necessary measures to drive the environmental work forward.