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TITLE:  <b>Biodiversity Policy</b>		<i>AUTHOR:</i> Peter Nyegaard Jensen	
		<i>CHECKED:</i>	
		<i>APPROVED:</i>	
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## 1. INTRODUCTION and SCOPE

The managing director of Wind Cluster (the “Company”) has the power to design, assess and continuously revise the Governance and Sustainability System, and specifically to approve and update the corporate policies, which contain the guidelines governing the conduct of the Company within the meaning established by law.

In fulfilling these responsibilities, and aware of its commitment to the environment generally and to the preservation of the biodiversity of the territories in which Wind Cluster does business specifically, the managing director hereby approves this Biodiversity Policy (the “Policy”) pursuant to the provisions of the Purpose and Values of the Wind Cluster.

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## 2. POLICY

### 2.1. PURPOSE

The Policy is intended to establish a reference framework for integrating the protection and promotion of biodiversity into Wind Clusters, and to define the principles of conduct for the development of a business model that is sustainable and positive with nature, such that its activities protect and promote the development and growth of the natural heritage, particularly including the protection of animals, as living sentient beings.


The degradation of ecosystems and the unprecedented decline of biological diversity, unanimously identified by the scientific community as a direct consequence of the impact of human activities, entail serious environmental, economic and social risks, requiring action to reverse the loss of biodiversity.

Wind Cluster is committed to taking a leadership role in the conservation and promotion of biodiversity in its industry and to integrating into its management the United Nations 2050 vision of “Living in Harmony with Nature”, where biodiversity is valued, preserved, restored and used sustainably, maintaining the services of the ecosystem, supporting a healthy planet and providing essential benefits for all people.

This is aligned with the achievement of Sustainable Development Goals (SDGs) six, thirteen, fourteen, fifteen and seventeen approved by the United Nations.

### 2.2. SCOPE OF APPLICATION

This Policy applies to all Wind Cluster, as well as to all sub-agents over which the Company has effective control, within the limits established by law.

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### 2.3. MAIN PRINCIPLES OF CONDUCT

To implement its commitment to biodiversity, Wind Cluster shall be guided by the following main principles of conduct, which apply to all its activities:

- a) integrate biodiversity in internal strategic and decision-making processes of Wind Cluster;
- b) identify, quantify and assess, on an ongoing basis and throughout the life cycle of the facilities, the impacts and dependencies of Wind Cluster's activities on natural capital, including diversity and the protection of wild animals and protected and vulnerable species, fostering respect for them in all lines of conduct;
- c) apply the principle of mitigation hierarchy (avoid, minimise, restore, and compensate as a last resort) in all the phases of infrastructure projects;
- d) avoid locating new infrastructure projects in spaces that are protected due to their ecological, biological, cultural and/or landscape value or areas catalogued as having high value for biodiversity;
- e) avoid or reduce deforestation associated with their activities and supply chain;
- f) manage and compensate in quantity and quality the negative impacts produced on the environment, giving priority to solutions based on nature, facilitating the connectivity of populations and encouraging the development of special protection or private conservation areas;
- g) develop plans for monitoring flora and fauna, especially protected or vulnerable species, so that the interaction of infrastructure with the environment can be continuously assessed;
- h) integrate the management of natural capital and biodiversity into Wind Clusters's management system, setting goals, indicators and standards for the control, monitoring and audit thereof;
- i) identify and establish management plans for invasive species that pose a risk to ecosystems and species at sites where Wind Cluster operates;
- j) participate in carrying preservation, education and sensitisation projects, cooperating with government agencies, non-governmental organisations, local communities and other Stakeholders on biodiversity issues and relating to the fight against abandonment, violence, mistreatment, abuse and the illegal trafficking of animals, in accordance with the provisions of the General Sustainable Development Policy.
- k) promote biodiversity awareness and training for the Wind Custers employees as well as for subcontracted personnel and that of its suppliers; and
- l) report on the biodiversity actions of Wind Cluster, the presence of facilities in protected areas, and research, preservation, education and awareness-raising actions, periodically publishing a biodiversity report.

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#### 2.4. PRIORITY LINES OF ACTION

Biodiversity has a leading role in Wind Cluster’s strategy, for which reason four five priority lines of actions have been established to apply the main principles of conduct set out in the preceding section:

- a. protect biodiversity and make sustainable use of natural capital by adopting a hierarchy of conservation, integrating best practices throughout the life cycle in the management thereof and promoting actions for the regeneration and conservation of natural heritage;
- b. continuously identify, quantify and assess throughout the life cycle of the facilities, the impacts and dependencies of Wind Cluster’s activities on natural capital, with a focus on biodiversity, through the promotion of research and improving understanding of the ecosystems of the environments of the territories in which it operates;
- c. partnering with Stakeholders, considering their biodiversity needs and expectations, and participating in projects for the enhancement of biodiversity and the protection of and respect for animals; and
- d. highlighting and raising awareness of the importance of biodiversity protection and conservation through training, internal and external education, awards, publications, and sponsorship, and internal and external communication of the impact of Wind Clusters activities in this area.

\* \* \*

This Policy was initially approved by managing director of Wind Cluster on October 11<sup>th</sup> 2022.