

	Community Investment Procedure		Revision
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# Community Investment Procedure

## 1. PURPOSE

Contributing to long-term local value creation is a key success criterion towards achieving the overall company goal of delivering competitive and sustainable renewable energy. True to the vision of Improving Our Future, a uniform approach is necessary.

All community investments shall follow the same approach, which is anchored in the Code of Conduct and the Sustainability Policy. The purpose of this procedure is to:

- Describe the process for community investments in Scatec, including the criteria and procedures for assigning, managing, and evaluating the use of resources allocated to local development programmes.
- Guarantee that the Compliance Requirements are being fulfilled.

## 2. DEFINITIONS

By "Community Investments" we mean:

- Our voluntary initiatives (i.e., local development programmes) that contribute to the long-term common good of the local communities living closest to our sites and come in addition to efforts made to mitigate or compensate for project-related impacts. We are committed to contributing to the communities in a way that allows them to develop by themselves without becoming dependent on us.<sup>1</sup>
- In countries that have concessionary requirements, where Scatec is required by the concession to invest in socio-economic development activities, these shall also follow this procedure.

By "Compliance Requirements" we mean:

- Adherence to local legislation and Scatec's Code of Conduct, Anticorruption Policy, and Integrity Due Diligence Procedure.

## 3. OWNERSHIP AND ADVICE

This procedure is owned by the corporate E&S Unit. Changes or questions of interpretation shall be directed to the corporate E&S Unit.

## 4. GUIDING PRINCIPLES

Community investments in Scatec shall:

1. Be community needs based and promote long-term engagements that benefit both local communities and Scatec.
2. Be proportionate to the size of the overall commercial investment and the magnitude of social and environmental impacts of the projects and operations to which they are associated.
3. Be guided by a Stakeholder Engagement Plan (SEP) that is scaled to the risks and impacts for the asset. The SEP shall be developed in early construction phase and updated prior to operation phase and thereafter on an annual basis.

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<sup>1</sup> Please note that *donations* are not considered community investments. Only in exceptional circumstances do we accept donations, and these must be approved by the corporate E&S unit.

4. Not be used with the aim to influence public officials in the context of licensing, concession or permitting processes nor to gain an undue competitive advantage.
5. Follow Scatec's procurement standards regarding procurement processes required for the investment.
6. Follow the Compliance Requirements of Scatec.
7. Limit project management costs to an absolute maximum of 15% of the total investment.
8. Not contribute to political parties, religious groups, trade unions, candidates, or campaigns for public office.
9. Follow a participatory approach with regards to selection of activities.
10. Be fully transparent and documented.
11. Have a sustainable exit strategy.

## **5. MANAGING COMMUNITY INVESTMENTS**

- Based on a community needs assessment and stakeholder mapping, a Community Development Plan shall be developed prior to operations phase and approved by the corporate E&S Unit.
- Thereafter, Annual Implementation Plans, with budget and timeline, to be approved by the corporate E&S Unit prior to submission to Project's SPV Board for funding approval each year.
- A risk assessment and/or risk management plan must be developed prior to programme approval.
- Programmes shall have a written and approved agreement with recipient and/or partner affiliation. The agreement should clearly outline the scope, timeline, and responsibilities of the programme.
- Programmes shall be monitored on a quarterly basis with the objective of including them in the annual sustainability reports.
- An advisory board shall meet twice yearly to review ongoing programmes and assess the overall compliance of programmes against the Scatec Code of Conduct and the principles defined in this document.

## **6. COST ALLOCATION**

For each project, Scatec makes community development funds available for construction phase and for the entire period of operations. The amounts per project are calculated based on expected revenues and foreseen community needs.

## **7. OUR COMPLIANCE STANDARDS**

### **7.1 Integrity Due Diligence prior to any community investments**

- Scatec's Integrity Due Diligence (IDD) Procedure must be followed for all third parties according to the risk presented by each third party involved.
- No community investment shall be done without a prior IDD on relevant third parties (i.e., project partners, suppliers, service providers, beneficiaries, agents or intermediaries).

### **7.2 Compliance clauses and other standards**

- Compliance clauses shall be included in community investment agreements, with supervision/input by the relevant Regional or Compliance Officer.
- Contributions must be in line with Scatec's values, with local laws and regulations, and avoid perceptions of corruption or conflict of interest. Refer to Section 12 in the Code of Conduct 'Avoiding Conflicts of Interest.'
- An actual, potential, or perceived conflict of interest shall be disclosed through the Global Disclosure of Conflict-of-Interest register, openly available on PowerNet under Systems and Tools.
- Proper approvals must be obtained in line with the Group Authority and Signature Matrix.
- Mandatory commitments to make community investments, including those required under a license or by law, are high risk and must be closely scrutinised early to manage potential risks. Pay special attention to investments involving government entities and public officials.

## 8. ROLES AND RESPONSIBILITIES FOR COMMUNITY INVESTMENTS

Role	Responsibility
Community Liaison Officer (CLO)	<ul style="list-style-type: none"> <li>• Liaise with communities and local authorities.</li> <li>• Identify and propose new local development programmes.</li> <li>• Follow up and manage existing programmes.</li> </ul>
E&S Manager	<ul style="list-style-type: none"> <li>• Develop Annual Implementation Plan according to Procedure.</li> <li>• Implementation of Plan.</li> <li>• Report in the different channels.</li> </ul>
Corporate E&S Unit	<ul style="list-style-type: none"> <li>• Provide technical assistance to E&amp;S Managers and CLOs.</li> <li>• Approve Annual Implementation Plan from functional point of view prior to SPV Board submission for funding approval.</li> <li>• Integrate reporting.</li> <li>• Perform audits and controls on projects on behalf of the Project Board.</li> <li>• Advisory Board.</li> </ul>
Asset Manager/SPV Board	<ul style="list-style-type: none"> <li>• Approve programmes for funding.</li> </ul>