



Starlight Sustainability Policy

Version 01: November 2024

Introduction

Starlight is a responsible global developer of renewable energy assets. We are on a mission to generate a more sustainable future by leading the transition to clean energy. As a mission-driven organisation, Starlight develops high-quality, sustainable and innovative renewable energy projects to ensure a more prosperous future for people and nature.

Starlight is part of the [NextEnergy Group](#), a specialist investment and asset manager active in the development, operation and financing of renewable energy infrastructure assets and complementary technologies. Starlight's Sustainability Policy (herein, the **Policy**) is aligned with **NextEnergy Group's Sustainability Policies**, which stem from [NextEnergy Group's sustainability strategy](#) and supporting framework.



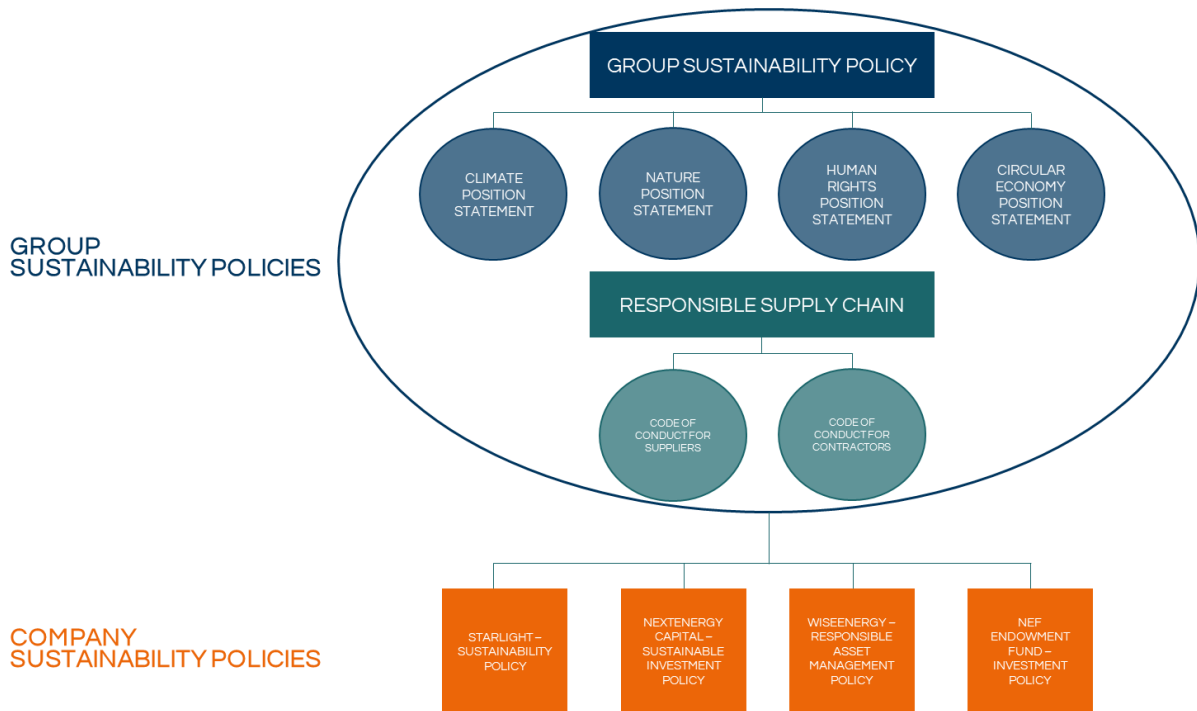
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NextEnergy Group's Sustainability Framework is at the core of our Sustainability Strategy. It is a visual representation of how we think about sustainability.

Starlight is determined to decarbonise the power generation sector and to mitigate climate change in a responsible and ethical manner. This Policy codifies Starlight's commitment to develop renewable energy assets to the highest environmental, social and governance (**ESG**) standards. It establishes the robust quality assurance processes which Starlight adopts to advance NextEnergy Group's industry-leading approach to clean energy generation.

Scope

Starlight develops renewable energy infrastructure assets, including solar PV, wind, green hydrogen and battery storage. Starlight's Sustainability Policy is aligned with NextEnergy Group's Sustainability Policies, which include NextEnergy Group's Sustainability Policy, topic-specific Position Statements, and responsible supply chain management documents.



This Policy applies to all of Starlight’s business activities, which span from early-stage greenfield projects through to those with “ready to build” status. It addresses the following areas:

- Principles and commitments
- Excluded activities
- Business integrity
- Responsibilities and governance
- Stewardship and engagement
- Monitoring and review

The Policy is supported by Starlight’s internal **Sustainable Development Procedure**, which set out the tailored risk management processes for Starlight’s development activities and guide Starlight’s teams to integrate ESG factors into the development process.

Principles and Commitments

This Policy aligns with the principles of international conventions, standards and guidelines which are relevant for the renewables and sustainable investment industries. We apply these standards to all of our projects. They extend to the whole value chain of the business, from our employees and local partners, to the broader communities we operate in.

We understand that going above and beyond compliance with local environmental and social standards may take time, particularly in those geographies where comprehensive ones are under development. However, Starlight is committed to promoting the highest ESG standards for nature, people and business integrity. Wherever applicable, we put in place action plans for projects to progressively achieve alignment with international standards, within a reasonable timeframe.

Starlight’s approach to generate positive sustainability outcomes for climate, nature, human rights and community is outlined below. These are the most material topics for Starlight’s responsible development activities under NextEnergy Group’s Sustainability Framework.

Climate

Starlight is committed to help deliver the goals of the Paris Agreement and facilitate investing aligned with global net zero emissions' targets, as set out in **NextEnergy Group's Climate Position Statement**. Starlight's approach to decarbonising its operations follows NextEnergy Group's Climate Transition and Net Zero Plan; the aim is to improve resource efficiency and include emission reduction measures in the project design so that the assets we develop contribute to advancing net zero ambitions throughout their operations.

Starlight is also committed to increasing awareness of climate change and improving the identification and assessment of climate-related risks during the site selection process. We do this by undertaking climate change risk assessments, and integrating climate risk mitigation and adaptation measures into the project designs. Examples include biodiversity considerations, flood prevention measures, and energy efficient design and technologies.

Nature and Biodiversity

NextEnergy Group recognises the urgency to reduce the intensity and drivers of biodiversity loss as part of the Kunming-Montreal Global Biodiversity Framework (**KM-GBF**). The Group's overall approach to nature aligns with the Task Force on Nature-Related Financial Disclosure (**TNFD**) framework and relevant national objectives of the countries in which it operates. Our approach and commitments are elaborated in **NextEnergy Group's Nature Position Statement**, with further detail in the Group's **Nature Strategy**.

Starlight's aim is to conciliate renewable energy infrastructure with biodiversity protection and enhancement by designing projects that mitigate impacts and restore biodiversity values on site. We advance this aim by applying the mitigation hierarchy (i.e., avoid, minimise, regenerate and only then offset) to all our projects in order to contribute to the Group's nature objectives and Science-Based Targets Network (**SBTN**) commitments. Furthermore, Starlight seeks to promote dual land use and agrivoltaics wherever possible in its development activities.

Human Rights

Starlight supports fundamental human rights principles. Our commitments are set out in **NextEnergy Group's Human Rights Position Statement**. They are guided by the United Nations Declaration of Human Rights (**UNDHR**). Starlight recognises the OECD Guidelines for Multinational Enterprises (**OECD MNE**) and the UN Guiding Principles of Business and Human Rights (**UNGP**) as the frameworks to identify and manage potential human rights risks associated with our development activities and broader business relationships.

We consider human rights from the project origination phase because we recognise the importance of respecting customary lands, particularly in regions where these are not supported fairly by local laws. We also avoid negative impacts to Indigenous communities and their livelihoods (see *Excluded Activities*). When developing a project with a neighbouring Indigenous community, we proactively inform and engage with them.

Community

At Starlight, we support our communities because we know that engaging with them is fundamental to ensure the environmental and social outperformance of our projects.

We prioritise collaboration, creating positive and lasting impacts in the communities in which we operate. We do this by opening and maintaining transparent, timely and clear communication channels regarding our business operations, plans and potential impacts, and we pay special attention to vulnerable communities. Feedback, concerns and objections received during the

development phase are addressed and integrated into the project design, where relevant, and effective grievance mechanisms are established with those stakeholders who are, or could potentially be, affected by our actions.

We also invest in local community development, co-creating positive impacts by listening to our local stakeholders' needs and concerns, and addressing them by including community benefits agreements in our planning consents, where possible.

Excluded Activities

Starlight does not knowingly develop renewable energy infrastructure assets where there is evidence of:

- Modern slavery, such as forced labour and human trafficking, or child labour;
- Conversion of natural ecosystems¹;
- Adverse impacts on protected areas such as UNESCO World Heritage Sites, unless there is prior consensus with both government authorities and UNESCO that the operations will not adversely affect the site;
- Adverse impacts on Critically Endangered (**CR**) and Endangered (**EN**) species, and associated critical habitats² categorised on the Red List of the International Union for Conservation of Nature (**IUCN**).

Starlight performs an enhanced review in cases where the initial screening of our site selection process highlights one of the following higher risks. If any one is identified, the development process does not proceed unless Starlight is able to implement appropriate mitigation measures, in accordance with the Principles and Commitments in the Group's Sustainability Policies and this Policy:

- Adverse impact on Indigenous People³;
- A land acquisition that requires involuntary resettlement;
- Direct or indirect impacts on areas of high biodiversity value, ecosystem integrity, or threats to water quality or quantity;
- Risk of corruption, money laundering, and bribery, based on a country macro-analysis and the track record of counterparties.

Business Integrity

Business Integrity is at the heart of NextEnergy Group's approach to sustainability. Starlight holds itself to the highest levels of business integrity standards; we expect the same conduct from all of our business partners.

¹ As defined by the Accountability Framework Initiative: Accountability Framework Initiative (2024), *Definitions* <<https://accountability-framework.org/use-the-accountability-framework/definitions/natural-ecosystem/>>

² As defined in the International Finance Corporation's (IFC) Performance Standard 6 on Biodiversity and the Sustainable Management of Living Natural Resources: IFC (2012), *Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources* <<https://www.ifc.org/en/insights-reports/2012/ifc-performance-standard-6>>

³ As defined in the IFC's Performance Standard 7 on Indigenous Peoples: IFC (2012), *Performance Standard 7: Indigenous Peoples* <<https://www.ifc.org/en/insights-reports/2012/ifc-performance-standard-7>>

Starlight is committed to conduct its dealings with local authorities in a transparent manner, adhering to the rule of law and procedures of each jurisdiction in which we develop our assets.

We take business integrity, anti-corruption and anti-money laundering local and international legislation and good practice into full account for each jurisdiction in which we develop our assets. We conduct checks of management executives and board members, where applicable, using an external intelligence tool to ensure that all of Starlight's development counterparties have high levels of corporate governance and business integrity practices.

Responsibilities and Governance

NextEnergy Group has a dedicated ESG team. The team is led by the Head of ESG, who reports to the Chief Executive Officer (CEO). Starlight has a dedicated Environmental and Community Manager who is responsible for ensuring adherence to this Policy. The Policy is re-evaluated and amended as appropriate from time-to-time; it is reviewed by senior management and approved by Starlight's Global Managing Director and the Group Head of ESG.

Starlight's Environmental and Community Manager works closely with Starlight's Development, Financial, Technical and Legal teams, and leverages the subject matter expertise of NextEnergy Group's ESG team, including on climate, nature, community and responsible sourcing.

Starlight's Investment Committee is composed of senior executives from across the Group with extensive sustainable finance and renewable energy development backgrounds. The Investment Committee provides strategic direction to Starlight's development approach, including approving target geographies; development budgets, and technologies. ESG considerations are integrated at the site screening stage and feed into the project design; decisions are taken by the Environmental and Community Manager in consultation with the Group ESG team.

Conflicts of Interest

Starlight's approach to identifying, managing and preventing conflicts of interest in its investment decision-making and stewardship activities is set out in a Conflicts of Interest Policy. It is part of NextEnergy Group's internal Compliance Policies and Procedures Manual.

The Conflicts of Interest Policy details the controls in place to avoid any circumstances which may give rise to a conflict of interest as a result of NextEnergy Group's structure and the business activities of other companies within the Group. Starlight does not intend to sell projects to NextEnergy Capital's funds in the absence of appropriate investor safeguards.

All team members receive a copy of the Group's Compliance Policies and Procedures Manual which, contains the conflicts of interest arrangements, and also receive training in respect of conflicts of interest generally and on specific or potential conflicts of interest to Starlight.

The Conflicts of Interest Policy is reviewed and re-approved, as appropriate, on at least an annual basis by NextEnergy Group's Global Head of Compliance.

Stewardship and Engagement

NextEnergy Group has five [Corporate Values](#) under which the Group's companies, including Starlight, are united. Starlight engages staff with NextEnergy Group's Corporate Values and provides training on sustainability, emphasising the importance and value of robust ESG practices.

Internally, our objectives are to continually improve the communication of our ESG activities within the organisation and, to encourage all team members to drive change through their daily activities for the ESG priority areas and underlying focus topics of NextEnergy Group's Sustainability Framework. This approach fosters collaborative teams, strong partnerships, and

long-term performance. In this regard, Starlight is committed to providing the necessary human and material resources to ensure the effective implementation of this Policy.

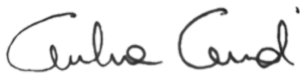
We recognise that contributing to sustainable renewable energy development extends beyond our internal practices. Starlight actively engages with industry stakeholders, including associations of which we are members, communities, authorities, landowners, NGOs, and academia. We promote awareness of the Groups' Values and sustainability commitments; share our knowledge and experience in the renewable industry; and, identify and materialise opportunities for collaboration.

Monitoring and Review

This Sustainability Policy has been reviewed by Starlight's senior management and approved by Starlight's Global Managing Director and the Group Head of ESG. It is effective from November 2024 and is re-evaluated and amended as appropriate from time to time.



Gianluca Boccanera
Global Managing Director, Starlight
NextEnergy Group



Giulia Guidi
Head of ESG
NextEnergy Group

Version Control

Version	Reason for update	Date of release	Initials
01	Initial version of Sustainability Policy	Nov 2024	GB, GG