GreenYellow Biodiversity Charter

greenyellow

SHIFT TO PROFITABLE ENERGY!

Executive Summary

Why a biodiversity charter?

GreenYellow's activities contribute to the energy transition and indirectly support biodiversity preservation, while potentially generating local impacts. In a context of increasing stakeholder expectations, this charter formalizes and structures the Group's commitments, in alignment with international frameworks.

Group commitment

GreenYellow commits to **integrating biodiversity across all its activities**, within a continuous improvement approach. Although impacts are mostly **limited** thanks to installations on already artificialized surfaces, appropriate vigilance is applied to each project.

Action principles

The Group's action is based on:

- **Compliance** with local regulations
- The **Mitigation Hierarchy**, also called the **Avoid - Reduce - Compensate (ARC) sequence** : prioritizing avoidance, reducing impacts, and compensating as a last resort
- **Early integration of biodiversity** considerations into projects

Implementation

Biodiversity is integrated through **structured ESG governance**, the **involvement of local teams**, and **Environmental and Social Management Systems (ESMS**) covering the entire project life cycle.

Monitoring and continuous improvement

Management relies on key indicators, such as **cleaning with clear water** and the objective of **"zero environmental incidents"**, with a progressive strengthening of the monitoring framework.

The mitigation hierarchy guides our actions throughout the entire life cycle of projects

1 – Site selection

- Avoid sensitive zones (e.g.: in Europe, Natura 2000 areas); prioritize degraded land when possible (except for agrivoltaics)
- Rely on our ecology experts and those responsible for consultations with local communities

2 - Design

- Maintain or develop vegetation cover to combat soil erosion (e.g.: Brazil, Mauritius)
- Use permeable fences allowing animals to move freely (e.g.: for small fauna in France, for monkeys in Brazil, ...)
- Conduct environmental impact studies according to local requirements (e.g.: large ground-mounted plants in France, Colombia and Brazil; ground-mounted or floating projects in Vietnam and Thailand)

3 - Construction

- Limit soil compaction: internal traffic plan, storage of topsoil in a dedicated area
- Protect wildlife by organizing its relocation before construction (Brazil) and marking sensitive areas (France)
- Adapt the schedule to avoid sensitive periods (e.g.: nesting)
- Raise awareness among workers before their on-site activities

4 - Operation & maintenance

- Carry out periodic monitoring according to local requirements, examples: fauna and flora depending on the case in France; soil erosion, absence of sanitary effluent discharge, growth of planted trees (where applicable) in Brazil; water and air quality in Vietnam
- Develop joint land uses where possible (e.g.: market gardening in Mauritius, agrivoltaics in France)

Consultation

- Systematically consult the municipality for large ground-mounted power plants (in France)
- Consult local communities during public meetings when required by the environmental impact study (e.g.: Vietnam, Colombia)

Waste & recycling

- Ensure strict waste-sorting and waste-management procedures are applied from the construction phase onward, in accordance with local requirements
- Integrate waste-sorting instructions into HSE routines and contractor contracts

Table of contents

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GreenYellow Biodiversity Charter - 2026 Edition

1. Objective

Aware that the construction and operation of solar power plants and the facilities required for its full range of energy services may have a direct or indirect impact on biodiversity, **GreenYellow is committed to working toward its preservation and promoting the sustainable management of living natural resources.**

This biodiversity charter formalizes our current commitments and practices and is part of a **process of continuous improvement** with local teams. It reflects our commitment to preventing and managing the potential impacts of our activities, while considering the diversity of local contexts, regulatory requirements, and operational realities specific to each country.

It outlines the principles guiding the identification, assessment, and management of dependencies, impacts, risks, and opportunities related to biodiversity. Our biodiversity charter is inspired in particular by the **Kunming-Montreal Global Biodiversity Framework**, which aims to protect and restore biodiversity and to promote the sustainable and equitable use of ecosystem services. Furthermore, as **a signatory to the United Nations Global Compact** (UN Global Compact), GreenYellow is committed to the 10 principles and the 17 Sustainable Development Goals,[1] particularly Goals 13 and 15 related to biodiversity.

The Biodiversity Charter is part of the Group's environmental and social policy, which aims to **protect the environment and promote social development at every stage of projects**, from planning to operation. Since biodiversity issues are closely linked to those of climate change and human rights, Green Yellow's policies regarding the decarbonization of its operations, responsible procurement, and HSE commitments also contribute to biodiversity conservation efforts. Specific issues have been clearly identified in **GreenYellow's double materiality analysis**: pollutant emissions (E31), resource and waste management throughout the facilities' lifecycle (E32), land-use changes and urbanization (E41), and biodiversity in the strict sense (E42).[2] Our commitment to continuous improvement is reinforced by the recent publication of ISO 17298 (2025), which provides, for the first time, a comprehensive framework for integrating biodiversity into the strategy and operations of organizations.

[1] THE 17 GOALS | Sustainable Development

[2] RSE25GB.pdf p15

2. Scope

This charter applies to **all projects** over which GreenYellow has direct management control, **throughout all their phases** (design, construction, operation, decommissioning), that may affect natural or critical habitats, ecosystem services, or are related to the production of living natural resources (particularly agrivoltaic projects).

3. Context and challenges

3.1. Definition and scope of biodiversity

According to the definition adopted by the Convention on Biological Diversity (1992), "biological diversity" refers to the variability among living organisms from all sources, including terrestrial, marine, and aquatic ecosystems and the ecological complexes of which they are part; it includes diversity within species, between species, and of ecosystems. In GreenYellow's policy, the primary focus is on the **diversity of habitats** (ecosystems) **and species** (fauna and flora), as these are the aspects most directly affected by our activities.

Ecosystem services are the benefits that people and businesses derive from ecosystems. They are made possible by biodiversity, and, as a result, impacts on biodiversity can often hinder the provision of these services (provisioning, regulating, cultural, and supporting services).[3]

3.2 Energy transition and biodiversity

The energy transition and the preservation of biodiversity are two major and inextricably linked challenges. The available data underscore the urgency of the situation: according to IPBES,[4] approximately one million species are threatened, and 68% of vertebrate populations have declined over the past fifty years.

The **direct drivers of biodiversity loss are** changes in land and ocean use, direct exploitation of organisms, climate change, pollution, and invasive species. These five direct drivers result from a set of underlying causes-the indirect drivers of change-which are themselves determined by social values and behaviors.

[3] According to IFC Performance Standard 6: PerformanceStandard6_GuidanceNotes_Jan19.pdf

[4] IPBES, or the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, is an international working group made up of scientists and experts tasked with assessing the state of biodiversity around the world and informing policy makers.

Thus, even though **photovoltaic electricity generation contributes directly to climate change mitigation, and therefore indirectly to the preservation of biodiversity,** its deployment must avoid exacerbating the erosion of living ecosystems. **It is possible to design and operate a photovoltaic project while minimizing its impact on biodiversity.**

3.3 Materiality for GY

Most of GreenYellow's activities have a limited direct impact on biodiversity and soil, as they are primarily located in areas that are already developed or degraded: most of our existing and planned solar power plants are installed on rooftops and carports in already developed areas, and our energy efficiency projects are implemented inside our customers' buildings.

Furthermore, **our decentralized model** based on many medium-sized power plants rather than very large, concentrated facilities - also helps limit the scale of potential impacts.

4. Guiding principles

Our approach is guided by the **IFC[5] Performance Standards**, particularly IFC PS6.2,[6] and is based on applicable international, national, and local **regulations**. It establishes a structured framework for action, including the **implementation of environmental and social management systems (ESMS).**

4.1 Protection of ecosystems

GreenYellow is committed to **protecting biodiversity and preserving ecosystem services**, and to promoting the sustainable management of living natural resources.

In particular, GreenYellow is committed to minimizing the impact of its photovoltaic and agrivoltaic power plant installations on wildlife, flora, forests, waterways, and soil.

4.2 Compliance

Regardless of the context, GreenYellow projects are developed, installed, and operated **in compliance with local laws and requirements**. Field teams, reporting to the operations and development departments, conduct the environmental impact assessments required by regulations,

[5] International Finance Corporation
[6] Performance Standard 6 is a requirement that aims to protect and conserve biodiversity, maintain the benefits of ecosystem services, and promote the sustainable management of living natural resources.

obtain all necessary permits and certifications, and offset the implementation and monitoring of measures to avoid, reduce, and, where necessary, offset environmental impacts.

Biodiversity issues, definitions, and public policies vary by country, as does the measurability of certain parameters; an activity that may be considered to have a greater impact in one context may be regulated differently in another. GreenYellow is committed to complying with applicable local frameworks and adapting its practices to remain compliant and proportionate to the requirements of each jurisdiction.

4.3 Mitigation hierarchy (ARC sequence)

The Mitigation Hierarchy, also called "Avoid – Reduce – Compensate" (ARC) approach, is the standard method for managing impacts on living organisms throughout a project's life cycle. It involves, first, avoiding impacts starting in the design phase (site selection, technical alternatives); second, reducing residual negative effects through appropriate measures (enabling infrastructure, ecological management); and, finally, offsetting impacts that could not be avoided or reduced through habitat restoration or creation, accompanied by monitoring. The avoidance phase is thus carried out first and requires the early integration of ecological considerations and, at times, significant modifications to projects, in order to minimize the need for offset.

Avoid

Most of GreenYellow's activities have a **limited impact on biodiversity and soil, as they are primarily located in areas that have already been developed** (carports, rooftops). For projects on sites that have not previously been developed (ground-mounted, floating, or agrivoltaic solar power plants), extra caution is required: **site selection is systematically cross-referenced with sensitive zoning** to prioritize the avoidance of wetlands, natural forests, etc., and legally protected areas (such as Natura 2000 in Europe, the Alliance for Zero Extinction, and UNESCO World Heritage sites). Once a location is selected, priority is given to **less sensitive or already degraded land** (industrial wastelands, ponds, reclaimed areas), with the obvious exception of agrivoltaic projects, whose specific purpose is to combine agricultural production with electricity generation. Fauna, flora, and habitat inventories are conducted over a full year at the earliest, along with an assessment of wetlands, **to identify, well in advance, any specific ecological issues** that would be incompatible with a photovoltaic project.

Reduce

Ground-mounted solar power plants can lead to ecosystem degradation. To minimize this impact, development teams **carefully select suitable sites**, prioritizing those that have already been developed, such as brownfield sites or artificial water bodies. Woodlands, hedgerows, and forest edges are key structural elements and are preserved as a priority. This approach benefits biodiversity and helps accelerate project completion by making it easier to obtain permits.

During the construction phase, we limit impacts, for example by scheduling work around species' sensitive periods, marking off construction zones, or adapting the type of equipment and traffic routes (to limit soil compaction where necessary).

During operation, most solar panels are cleaned with clear water. In certain specific cases, exemptions have been granted for panel cleaning, with the regulated use of specific products; these situations remain exceptional and are strictly monitored by the HSE manager.

Offsetting

When residual impacts remain, compensatory measures are taken to "enable the restoration of the environmental quality of the impacted natural environment to a level at least equivalent to its initial state and, if possible, to achieve a net gain, particularly for degraded environments"[7]. These measures are **implemented in accordance with each country's standards:** appropriate plantings, creation of ecological corridors, restoration of wetlands, creation of ponds, ecological management of natural environments, etc. The implementation of these measures is subject to periodic monitoring. In all cases, **the mitigation hierarchy (ARC) approach remains our framework for action:** avoid as a priority, reduce as much as possible, and offset as a last resort, with proportionate and transparent monitoring.

Avoidance, reduction, and offset measures are monitored to verify their effectiveness and document the entire ERC sequence.

In addition to its direct projects, GreenYellow **voluntarily contributes to reforestation projects outside its value chain** through the purchase of carbon credits certified by VCS and the Label Bas Carbone (for example, in Panama, Pakistan, or France). These initiatives are selected for their multiple benefits in terms of biodiversity, decarbonization, and socio-economic impact on neighboring communities.

[7] International Finance Corporation *Source: Doctrine ERC.pdf*

5. Governance, resources and management

5.1 Organization

The responsibility for the CSR strategy, which includes biodiversity issues, ultimately lies with the CEO, and its implementation is managed by the **CSR team**, under the supervision of senior management.

In addition, GreenYellow's governance structure includes several specialized committees. The committee responsible for biodiversity issues is the **ESG Committee**, whose chairperson is appointed by the majority shareholder. It meets twice a year, and members of Green Yellow's Executive Committee are invited, along with the Group CSR team and the Group HSE Manager.

The implementation of biodiversity-related actions for each project are managed by the development and operations departments of each local GreenYellow entity. Depending on local contexts, project teams may include biodiversity experts. Thus, GreenYellow has a **biodiversity expertise center** (agricultural engineer, ecologist) in France, and in countries affected by these issues, teams responsible for biodiversity and relations with neighboring communities.

5.2 Implementation measures

Environmental and social management systems (ESMS) are in place and guide our actions: conducting environmental impact assessments (EIA) in accordance with legal requirements, implementing HSE action plans, conducting regular audits, monitoring subcontractors and the supply chain, and establishing compliance and transparency mechanisms. In practice, the consideration of biodiversity issues varies depending on the materiality of risks, applicable regulations, and the requirements of funders or authorities.

Our willingness to strengthening these tools, as part of our continuous improvement efforts, is supported by the recent publication of ISO 17298 (2025), which provides, for the first time, a comprehensive framework for integrating biodiversity into organizational strategy and operations:

- Identification of impacts, dependencies, risks, and opportunities;
- Action plan with indicators and governance; alignment with the CSRD, the TNFD, ISO 14001, and ISO 26000;
- A framework for continuous improvement and non-financial transparency.

5.3 Risk management and impact assessment

GreenYellow is committed to actively managing the environmental, social, and ethical risks associated with its operations at every stage of project development, from construction through to operation. **Biodiversity risk management is part of ESG risk management**. In this context, GreenYellow assesses and adjusts its mapping of non-financial risks. This ESG risk map is integrated into the Group's risk map.

5.4 Stakeholder engagement

The systematic assessment of subcontractors based on ESG and HSE criteria ensures risk management and compliance across all sites. In particular, GreenYellow implements high standards in health, safety, and the environment (HSE), with **"Four-Zero" goals that include zero environmental incidents,** regular audits, and the digitization of routines. Finally, responsible procurement is guided by an ISO 20400-aligned purchasing code, social audits, and collaboration with peers.

Furthermore, **local communities surrounding a project site are consulted** when required. For ground-mounted projects, a minimum consultation with the municipality is organized, along with discussions with residents to ensure information accessibility.

Waste management and recycling are structured, notably through a partnership with local eco-organizations for the recycling of panels wherever they exist and rigorous monitoring of waste starting from the construction phase.

Finally, to promote the exchange of best practices, GreenYellow participates in and contributes to various sector-specific groups working on biodiversity, for example through its membership in the France Agrivoltaïsme association, the ReSpirE association, or its participation in dedicated working groups of France Renouvelables and La Plateforme Verte.

5.5 Monitoring indicators

At this stage, two indicators are tracked at the group level:

- **Panel cleaning water:** the proportion of operations carried out using clear water and, in exceptional cases, the use of a biodegradable product approved by the HSE manager.
- **Zero environmental incidents**: integrated into the "Four-Zero" objectives and tracked in the HSE dashboards.

We are working to identify and formalize additional indicators that are relevant to our activities and local contexts. These will be added gradually as part of our continuous improvement process.

6. Our concrete actions throughout the project lifecycle

6.1 Site selection and preliminary studies

We prioritize already developed areas (rooftops, parking lots, brownfields) to minimize land development and the impact on natural habitats. For ground-mounted projects, we primarily seek out low-impact or degraded sites and avoid locations identified locally as having high ecological significance. When multiple locations are feasible, the site selection is documented (justification for the chosen site and lower-impact alternatives) based on available literature and, if necessary, **ecological surveys** appropriate to the context. **Environmental impact assessments (EIA) are conducted when required by regulations.** They establish the requirements and monitoring protocols (water, air, noise, etc.).

Thus, in France, ground-mounted projects avoid Natura 2000 sites, nature reserves, and natural areas of ecological interest (Type 1 ZNIEFFs) and prioritize less sensitive or degraded land whenever possible; in Thailand and Vietnam, ground-based or floating projects are reviewed as part of the local environmental impact assessment, while rooftop projects generally do not require specific biodiversity-related permits; in Brazil, the nature and depth of the studies depend on each state, which requires adapting the approach to the local framework. In Colombia, even when a project does not require a specific permit, teams contact the relevant environmental authority. The goal is to verify local restrictions and land-use conditions. This also makes it possible **to check for the presence of sensitive ecosystems and to align with regional biodiversity policies**.

6.2 Design

The design incorporates the mitigation hierarchy (ARC) approach from the outset: minimizing the footprint (reducing the occupied area and construction zones to the minimum), spacing between rows (including equipment traffic), **and preserving key landscape features** (hedges, woodlands, and isolated trees), while maintaining **a distance from the edges of these areas** where appropriate. **Wetlands are avoided** as much as possible.

For example, in France, soil coverage rate requirements are met, and the near-systematic preservation of hedges and woodlands is sought, providing benefits for both biodiversity and landscape integration. This is also the case in Mauritius with the establishment of “green zones” of vegetation around certain ground-mounted power plants. In Asia, floating projects primarily involve industrial water reservoirs, with particular attention paid to the coverage rate of water bodies and the uses of the reservoir. In Brazil and Mauritius, the maintenance or

development of vegetation cover is implemented **to combat soil erosion**. Additionally, power plants are designed with **permeable fencing for small wildlife** in France, and for monkeys at certain plants in Brazil, to allow animals to move freely. In Colombia, when permits are required, the design takes the associated conditions into account. This may include **a logging permit** (covering inventory and authorized logging operations), as well as **a watercourse use permit** when the project involves a watercourse or natural drainage system. Similarly to Mauritius, in this case, a minimum distance must be maintained between the sites and rivers.

6.3 Construction

Construction sites are organized **to minimize disturbances and soil compaction:** internal traffic plans, **storage of topsoil** in designated areas, **marking of sensitive areas, and adjustment of the schedule** to avoid locally identified sensitive periods (nesting, amphibians, etc.). The requirements resulting from environmental impact studies and applicable HSE procedures are enforced.

For example, in France, "protected species" exemptions may be requested if there is a sufficiently identified risk to the species, with strictly regulated conditions for intervention. Additionally, during construction, **workers are made aware of biodiversity issues** and the best practices to follow. **Noise pollution and potential dust emissions** are minimized as much as possible and are sometimes subject to specific requirements in environmental permits, for example in Mauritius. **Fertile soil can be stored** in a designated area, and in some cases even redistributed to neighboring farmers, as in Mauritius. In Brazil, when vegetation removal is necessary, **wildlife management measures** (scaring, capture-and-release) are implemented at the start of work in accordance with local requirements. In Colombia, a wildlife management plan is implemented when necessary. It may include rescue and relocation efforts, monitoring during the construction phase, and stakeholder outreach. Ensuring that **no sanitary effluents are discharged** is also a key priority, for example in Mauritius and Brazil.

6.4 Operation and maintenance

During the operational phase, **maintenance aims to ensure optimal performance of the power plants while protecting the environment and wildlife.** When required by the environmental authority, **periodic monitoring is conducted.** This monitoring focuses on habitat, flora, and specific wildlife groups selected based on the site's specific concerns.

For example, in France, multi-year monitoring of fauna or flora may be required; in Vietnam, monitoring requirements stemming from the environmental impact assessment primarily focus on physicochemical parameters (water, air, noise) for the sites in question. In Brazil, monitoring is conducted on soil erosion, sanitary effluents, and the growth of planted trees where applicable. In Colombia, when projects require an environmental permit, periodic monitoring and compliance checks are implemented to ensure adherence to approved environmental management plans.

Furthermore, where possible, **co-uses may be developed**, such as **vegetable farming** in Mauritius or **agrivoltaics** in France.

Panel cleaning is primarily done with clear water. The use of cleaning products is exceptional, strictly regulated, and monitored through an internal procedure.

6.5 Public Engagement

Public engagement covers the entire project. For ground-mounted projects, a minimum consultation with the local municipality is organized when required, along with **discussions with residents** to ensure access to information. **Conservation organizations** may be involved when appropriate, given their knowledge of local issues.
For example, in France, the municipality is systematically consulted for ground-mounted solar projects; in Colombia, large projects subject to an EIA also include public participation. In Vietnam, public meetings may be organized annually when required by the environmental impact assessment.

6.6 Waste and recycling

Waste management complies with local regulations. HSE procedures and subcontractor agreements incorporate compliance with **current waste sorting guidelines.**

For construction sites, GreenYellow implements a strict waste sorting and management procedure starting from the construction phase, with rigorous monitoring. **A large portion of the waste is processed and recycled through specialized channels**, ensuring optimal handling of each component throughout the project's lifecycle. For energy-efficiency sites, GreenYellow ensures that subcontractors (who are contractually responsible) sort and recycle the various replaced materials.

At the same time, we have implemented **a process for recycling end-of-life solar panels.** In France, we collaborate with the eco-organization Soren, while in Brazil, we work with local service providers that promote the circular economy. In the absence of a national solar panel recycling network, damaged panels are tracked, and discussions are held with authorities to identify solutions, particularly following severe weather events. Pooling initiatives may be explored at the Group level if they are compatible with local regulations.