

# SUZLON ENERGY LIMITED CLIMATE CHANGE POLICY

Date of Board Approval	Particulars	Effective Date
12 <sup>th</sup> March 2025	Introduction and Implementation of the Climate Change Policy	12 <sup>th</sup> March 2025
Document History: First Revision: Second Revision:		

# Policy statement and purpose

Suzlon Energy Limited ("Suzlon" or the "Company") is committed to leading the global transition to renewable energy. We recognize the urgent need to address climate change and the pivotal role that renewable energy plays in reducing global greenhouse gas (GHG) emissions. Our operations are aligned with global climate change goals of the Paris Agreement under the United Nations Framework Convention on Climate Change (UNFCCC) "to limit the increase in the global average temperature to well below 2°C above pre-industrial levels" and pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels", and we are dedicated to making a significant contribution to decarbonisation efforts, while advancing energy access, affordability, and security.

This Policy outlines the Company's strategic approach to mitigating and enhancing resilience to climate change by effectively reducing GHG emissions and decarbonizing our operations and value chain, managing climate-related physical and transition risks, promoting renewable energy solutions, and ensuring compliance with relevant climate policies, standards, and regulations. It aligns with the international frameworks and standards such as UNFCCC and the Paris Agreement. United Nations Sustainable Development Goals (SDGs), GHG Protocol, ISO 14001, ISO 14064, ISO 14067, ISO 14090, ISO 14091, ISO 14097 and ISO 50001, IFC Performance Standards, International Sustainability Standards Board's (ISSB) International Sustainability Reporting Standard S1 'General Requirements for Disclosure of Sustainability-related Financial Information' and International Financial Reporting Standard S2 'Climate-related Disclosures'/Task Force on Climate-related Financial Disclosures (TCFD), CDP, Global Reporting Initiative (GRI) Standards, and national commitments and regulations, including India's Nationally Determined Contribution (NDC) to the Paris Agreement, the National Guidelines on Responsible Business Conduct (NGRBC).

The purpose of this Climate Change Policy is to provide a clear framework for the Company to combat climate change, drive global decarbonisation, and promote a sustainable, low-carbon future. This Policy highlights the role of renewable energy in



addressing climate challenges and supporting the energy transition, while providing linkages with other material sustainability topics for Suzlon and related policies, e.g. related to Energy Management, Biodiversity, Water Management, Product Stewardship. The Company's commitment is driven by values of social responsibility, resource efficiency, and innovation, ensuring alignment with global and national climate goals while safeguarding the long-term well-being of the environment, society, and business.

# Applicability of this Policy

This Policy applies to the Company's all operations and stakeholders including employees, customers, suppliers, and partners along with business functions, and throughout the lifecycle of its projects. The Policy also applies to investees not belonging to the Company but over which it has effective control, within the limits established by the law.

## Definitions

Unless repugnant to the context:

- "Applicable Laws" shall mean the Act and Rules made thereunder, the Listing Regulations, the NGRBC Guidelines and / or such other Act, Rules or Regulations which are / may be applicable to the objective and / or subject matter of this Policy.
- "Board" or "Board of Directions" shall mean the Board of Directors of the Company.
- "Carbon Footprint" shall mean amount of GHG emissions in carbon dioxide (CO<sub>2</sub>) equivalent associated with all the activities of an entity (e.g., building, corporation, country, etc.). It includes direct emissions that result from activities the entity controls, indirect emissions from the use of electricity, heat and steam, and indirect emissions elated to the value chain not under ownership control of the entity. In addition, the carbon footprint also includes the emissions of other greenhouse gases, such as methane, nitrous oxide, or chlorofluorocarbons (CFCs).
- "Climate Change" shall mean long-term shifts in temperatures and weather patterns. Such shifts can be natural, due to changes in the sun's activity or large volcanic eruptions as well as human activities, primarily burning of fossil fuels.
- "Company", "Suzlon" or "SEL" shall mean Suzlon Energy Limited.
- "Decarbonisation" shall mean strategic reduction of human-induced GHG emissions to counteract climate change and transition to a low carbon future.
- "Greenhouse Gases" or "GHGs" shall mean seven gases that have direct effects on climate change, namely carbon dioxide (CO<sub>2</sub>); methane (CH<sub>4</sub>);



nitrous oxide (N<sub>2</sub>O); hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); and sulphur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>).

- "Guidelines" or NGRBC Guidelines shall mean the National Guidelines on Responsible Business conduct issues by the Ministry of Corporate Affairs on 15<sup>th</sup> March, 2019.
- "Listing Regulations" shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued thereunder, including any statutory modification(s) or re-enactment(s) thereof for the time being in force.
- "Policy" or "this Policy" shall mean this Energy and Climate Change Policy.

Interpretation – In this Policy unless the contrary intention appears, words and expressions used and not defined in this Policy but defined in the Applicable Laws shall have the meanings respectively assigned to them in those Applicable Laws.

#### **Review of the Policy and disclosure requirements**

This Policy has been developed and adopted on 12<sup>th</sup> March 2025.

This Policy is subordinate to the Listing Regulations or other applicable statutory provisions including the Companies Act, 2013, as amended, and in the event of disparity between this Policy and the Applicable Laws (including due to subsequent amendments to the Applicable Laws), the provisions of the Applicable Laws will prevail.

The Board shall oversee the implementation of this Policy and periodically review this Policy to ensure the continuing applicability and relevance to the Company's operations and evolving stakeholder expectations. This exercise shall be conducted once a year or as and when there are changes or future developments so as to incorporate the best practices and changes required in terms of compliance with Applicable Law, and Energy and Climate Change standards and best practices.

The Board reserves any right to alter, modify, add, delete or amend any of the provisions of this Policy subject to Applicable Laws.

The content and robustness of implementation of this Policy will be reviewed periodically and revised accordingly.

## **Our Commitment**

Suzion places great importance on issues and matters related to energy and climate change, and the role we have to play in the energy transition. We aim to lead climate action through ambitious targets and implementing effective strategies. Our business operations are deeply aligned with global sustainability and climate goals, and we aim to contribute significantly to global decarbonisation efforts, while advancing energy access, affordability, and security. Our commitment includes the following:



# 1. GHG Emissions Data

- Regularly collect, review, assess, validate internally and disclose through annual sustainability reporting process GHG emission data across our business units (Manufacturing, Projects, OMS and SE Forge), plants and units in line with international standards (e.g. GHG Protocol, ISO 14064).
- Regularly collect, review, assess, validate internally and disclose in line with the related requirements of the international standards and certification systems (e.g. ISO 14067) GHG emissions associated with our key products and services, gradually expanding the coverage for the carbon footprint across our product and services portfolio.
- Alignment with internal roadmap for decarbonization strategy and climate change adaptation and review on periodic basis will be carried out.
- Engage third-party auditors to verify GHG emissions, emission reductions, and energy performance on an annual basis prior to such data disclosure.

## 2. Decarbonisation

- Reduce GHG emissions in line with the Paris Agreement's targets and the latest IPCC (Intergovernmental Panel on Climate Change) recommendations and achieving Net Zero (Scope 1 & 2) by 2035.
- Accelerate the adoption of renewable energy across our operations to the extent feasible and depending on the local geographical, regulatory and market conditions, and ensure energy efficiency in all processes.
- Encourage the use of low-carbon strategy across plants, units, products and services.
- Support the use of sustainable practices among stakeholders to reduce their emissions.
- Set clear GHG emissions reduction targets: Establish specific, measurable, and time-bound goals for Scope 1-2 and Scope 3 GHG emissions reduction across our company, business units, plants, products and services.
- Monitor progress and adjust strategies: Continuously monitor progress against set targets, track carbon footprint reductions, and adjust strategies to meet evolving climate goals.



# 3. Resilience to Physical Climate Risks

- Implement regular assessments of climate-related physical risks that may affect business operations and value chain, using scenario analysis, including evaluating acute and chronic physical risks, such as changing wind patterns, extreme weather events, and other climate-induced disruptions as per TCFD/IFRS S2.
- Ensure that the locations and designs of projects developed are optimized for resilience against climate impacts, including severe weather events such as floods, cyclones, or high winds.
- Develop climate change adaptation strategies that not only address business operations and in local communities, where we operate, against extreme weather events and long-term climate shifts.
- Integrate physical climate risk assessment using scenario analysis into environmental impact assessment and due diligence studies prior to the site selection for new plants, projects, and other facilities, and for merger & acquisition decisions.

# 4. Resilience to Transition Risks and Capturing Transition Opportunities

- Implement regular assessments of climate-related transition risks and opportunities across business segments that may affect business operations and value chain using scenario analysis, including risks and opportunities related to policies, regulations, technology, market and reputation as per TCFD/IFRS S2.
- Establish and maintain an internal carbon pricing (ICP) mechanism to evaluate emissions' financial implications and incentivize emission reductions within business decision-making processes.
- Regularly adjust the internal carbon price to reflect market conditions, regulatory developments, and corporate goals for decarbonisation.
- Integrate climate change considerations into future growth and merger & acquisition plans, assessing potential impact of such decisions on the Company's future GHG emissions and decarbonization targets.

## 5. Energy Efficiency and Innovation

 Increase investment in research and development for advanced renewable technologies, such as more efficient wind turbines, solar integration, energy storage systems, and smart grids, to improve sustainability and energy efficiency.



 Integrate energy-saving technologies across our manufacturing plants, corporate operations, and supply chain, aiming for continuous energy efficiency improvement.

### 6. Regulatory Compliance and Reporting

- Regularly (e.g. annually) review applicable climate and energy-related national laws, regulations and policies and key international agreements and standards developments that may have direct or indirect implication on the Company, its operations and value chain.
- Adhere to all climate-related national laws, regulations and policies and key international agreements and standards as mentioned in the 'Policy statement and purpose' section and new applicable requirements identified through the regular (e.g. annual) review.
- Provide annual reports on climate-related performance, focusing on emissions reductions, climate risk management, and progress towards decarbonisation targets. Ensure alignment with global climate disclosure frameworks, such as the TCFD/IFRS S2 and GRI.
- Publish verified Product Carbon Footprint (PCF) and Life Cycle analysis (LCA) data to provide stakeholders with clear insights into our environmental performance and product sustainability.
- Pursue recognized climate, environmental certifications and renewable energy standards to ensure transparency and accountability.

## 7. Stakeholder Engagement

- Foster collaboration with stakeholders—including customers, governments, communities, and environmental organisations—to promote and accelerate the transition to a low-carbon economy.
- Raise awareness and capacity building of climate change and sustainability across the organisation and our value chain. Provide training programs to employees at all levels and empower them to contribute to our climate change efforts.
- Work closely with our customers to promote the environmental benefits of wind, solar and other renewable energies and assist them in achieving their sustainability goals. This includes providing guidance on reducing carbon footprints through the adoption of renewable energy solutions.
- Engage with suppliers and service providers to enhance their understanding of the importance of climate-related risks and GHG management, including collection and reporting on GHG data related to their products and services, and integrate climate change considerations in the Suzlon's supplier code of

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conduct and the assessment process to support our Company's Scope 3 decarbonization efforts and supply chain climate resilience.

- Collaborate with value chain partners for potential joint implementation of GHG emission reduction and carbon offsetting projects.
- Collaborate with governments, environmental organisations, industry groups and other stakeholders to drive collective action on climate change and renewable energy development. This includes participating in Policy dialogues and advocating for stronger renewable energy targets and climate action.

# 8. Carbon Offsetting and Carbon Market

- Where needed and in addition to internal decarbonisation efforts, invest in credible carbon offset projects as part of our broader decarbonisation strategy to mitigate GHG emissions that cannot be fully eliminated. Promote reforestation, renewable energy projects, and other sustainable initiatives.
- Continuously monitor the developments of domestic and international carbon markets to assess opportunities for participation for Suzlon.

#### 9. Climate Change Education and Awareness

- Integrate climate change education into training and awareness programs for all employees, stakeholders, and communities to enhance understanding and engagement on climate issues.
- Act as a thought leader by advocating for effective climate change policies and initiatives that foster a sustainable, low-carbon future.

#### **Responsibility and Accountability**

Led by the Board and Sustainability Committee, The Company will at minimum review this Policy on an annual basis to ensure its effectiveness and alignment with changing climate policies, technological advancements, and global climate change targets. We are committed to continuously improving our practices and ensuring that we meet the highest environmental standards. The results of these reviews will be communicated to stakeholders and used to guide future strategies.

The implementation and adherence to this Policy are the responsibility of the Company's Senior Leadership Team, with oversight provided by the CSR & ESG Committee at Board level. Climate change and energy performance will be reviewed annually, and progress towards targets will be measured and communicated transparently on an annual basis.

**Date:** *12<sup>th</sup> March 2025* 

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JP Chalasani Group CEO Suzlon Energy Limited