



# SUSTAINABILITY REPORT 2024

**SCHØLTenergy**

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# OUR COMMITMENT TO A SUSTAINABLE FUTURE

As Scholt Energy continues to grow, so does our commitment to sustainability. This commitment extends beyond our alignment with the Paris Agreement, it reflects our dedication to fostering a safe, inclusive and thriving workplace, as well as contributing meaningfully to the energy transition.

The year 2024 marked a pivotal moment for Scholt Energy: a year of reflection, insight and goal-setting. We asked ourselves critical questions: where do we stand on sustainability? What are we doing well and what can we improve? And most importantly, what core values drives us as a company?

For the first time, we are publishing concrete CO<sub>2</sub> reduction targets, covering our entire carbon footprint. These targets are not just aspirational, they are tangible. Implementation begins in 2025 and 2026, supported by clear measures and a long-term roadmap.

We aim to be ambitious in our sustainability journey, but also realistic. We recognize the urgency of climate change and the need for

collective action. At the same time, we acknowledge the complex challenges ahead, such as grid congestion and market volatility. These realities require thoughtful, pragmatic solutions.

Despite these challenges, our vision remains clear: 'Climate Neutral Energy for all Businesses'. We understand that the path to this vision will be demanding and non-linear. Yet, we are proud of the progress we've made and the foundation we are building. By increasing our share of renewable energy, ESG integration into strategy and innovation, we are shaping a resilient and future-proof business.

This report reflects our journey thus far, as well as our commitment to transparency, accountability and continuous improvement. We look forward to working with our partners, clients, and colleagues to turn our sustainability ambitions into lasting impact.

*Dennis Krispijn*

CHIEF SUSTAINABILITY OFFICER



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# INTRODUCTION



# COMPANY OVERVIEW

Scholt Energy has been active as an energy supplier to the Dutch business market since 1 January 2005. The company's first activities in the energy sector, however, date back to September 2003, initially focusing on energy savings for the cold industry.

The Belgian entity, Scholt Energy NV, was incorporated in 2009, followed by the German entity, Scholt Energy GmbH, in 2014. In 2020, Scholt Energy GmbH was also established under Austrian law. Since 2014, Scholt Energy has expanded its services to include energy transition solutions.

## What distinguishes us

What sets Scholt Energy apart is our ability to support customers in all aspects of energy, always with their best interests in mind. When buying or selling energy on the market, we strive to achieve the best possible price.

In the field of sustainable energy, we provide tailored advice to determine the steps that best suit each customer. This can range from purchasing renewable energy to projects where different assets are optimised and flexibility is monetised.

We offer transparent insights into the energy market and provide our customers with personalized and proactive guidance every step of the way.

## Our sustainable products

Besides our regular energy supply of power and gas, Scholt Energy specializes in several sustainability related products:



### Renewable energy supply

Scholt Energy offers mid- and large-scale corporate energy consumers access to various sources of renewable energy and provides producers with the opportunity to sell their renewable energy production. By facilitating renewable energy through Guarantees of Origin (GOO) and Corporate Power Purchase Agreements (CPPA), we connect energy consumers and producers while providing financial security.

We support corporate energy consumers in achieving their sustainability goals and help producers sell their renewable production at a long-term fixed price. In doing so, we actively contribute to the transition towards 100% renewable energy.



### Flexibility services

Scholt Energy provides flexibility services to asset owners (producers) via our Virtual Power Plant (VPP), including energy storage, curtailment and demand response. These flexibility services are also offered to mid- and large-scale corporate energy consumers.

We manage a pool of flexible assets using proprietary in-house algorithms, deployed during periods of electricity grid shortage or surplus. This enables asset owners to monetise their flexibility while supporting the transformation of the energy network by integrating renewable energy and providing essential balancing services. Our ambition is to manage the future renewable energy grid, enabling a more sustainable, flexible, and reliable energy system.

## Where we operate

Scholt Energy is active in the business-to-business sector in the Netherlands, Belgium, Germany and Austria. The general head office is located in Eindhoven (Netherlands) with local (sales) offices in Belgium, Germany and Austria.

NETHERLANDS (HEADOFFICE)  
Eindhoven

GERMANY  
Ratingen

BELGIUM  
Waregem

AUSTRIA  
Salzburg





# VISION MISSION



Scholt Energy feels obliged to assume its responsibility as regards to a sustainable world. Our vision is focused on long-term goals of the company. Now and in the future, we strive to bring climate neutral energy to all businesses.

The mission guides us towards achieving this vision. By maximising renewable energy consumption and utilising all renewable and industrial flexibility we facilitate the energy transition. As an energy partner, we look at which sustainable steps suit our customers. Through powerful partnerships, we facilitate the transition to climate neutral energy and get closer to our goal.

While we are committed to the goals of the Paris Agreement and the 1.5°C target, we recognize that each customer is on their own sustainability journey. We therefore support our clients in taking meaningful steps at a pace that aligns with their ambitions and capabilities, without imposing a one-size-fits-all approach.

# VALUE CHAIN & KEY STAKEHOLDERS

## Value Chain

Scholt Energy's value chain spans the entire energy lifecycle, from raw material extraction and power generation to energy distribution and end-use consumption. In the upstream phase, raw materials and power generation sources—including natural gas, nuclear, wind, solar, hydro, and biomass—are procured and maintained. The midstream phase involves market operations, data management, and trading activities, ensuring efficient purchase and sale of energy through various channels such as the over-the-counter (OTC) and spot markets.

Our own operations form the core of the value chain, encompass continuous market monitoring, energy procurement, operations, sales, energy supply and energy flexibility services. Scholt Energy guarantees the origin of the energy it provides and actively engages in renewable energy procurement through Power Purchase Agreements (PPAs) and Corporate Power Purchase Agreements (CPPAs).

In the downstream phase, energy is distributed to customers and partners, supporting responsible consumption and usage. Scholt Energy collaborates closely with a range of stakeholders—including suppliers, network operators, and end-users—to enhance energy efficiency, sustainability, and transparency across the entire chain.

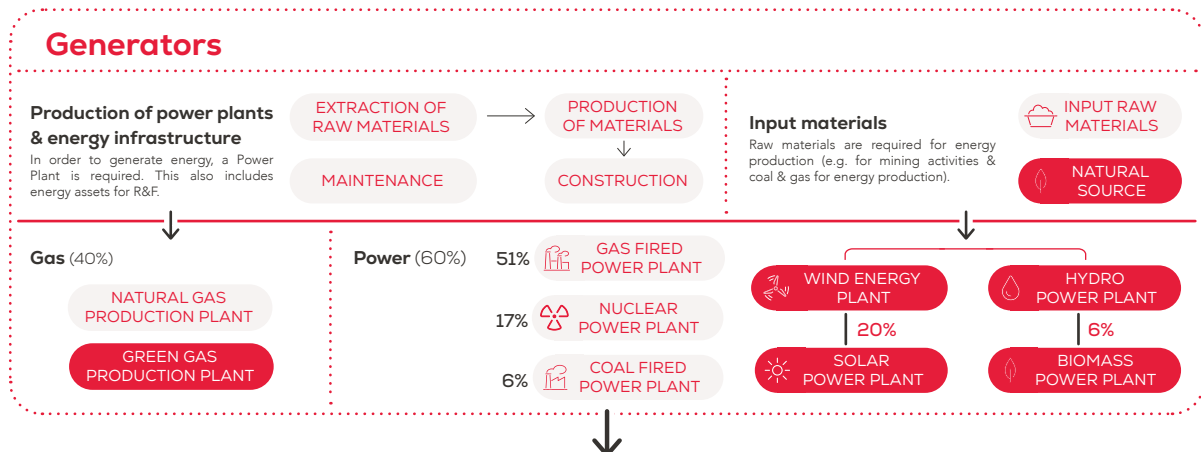
## Key stakeholders

Within our value chain, several key stakeholders have been identified. In the upstream sector, we have our key energy suppliers (sourcing partners) for traditional energy supply and the asset owners (of wind- and solar farms) for renewable energy supply. In our midstream our software suppliers can be seen as key stakeholders to ensure continuity in the day-to-day operations of Scholt Energy. Albeit not located in our midstream, the same can be said for our financing partners. Key stakeholders in our own operations are our employees, which are vital to sustain the high standards Scholt Energy sets for itself and to provide the best service to our customers. Finally, the key stakeholders in our downstream are Scholt Energy's customers as well as the network operators.

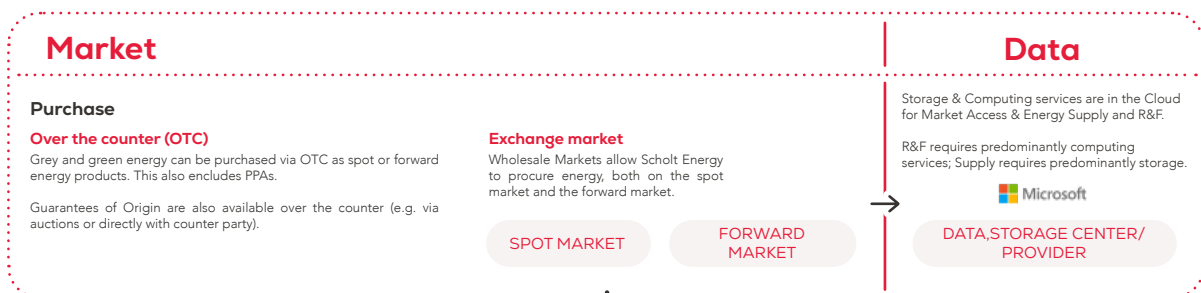




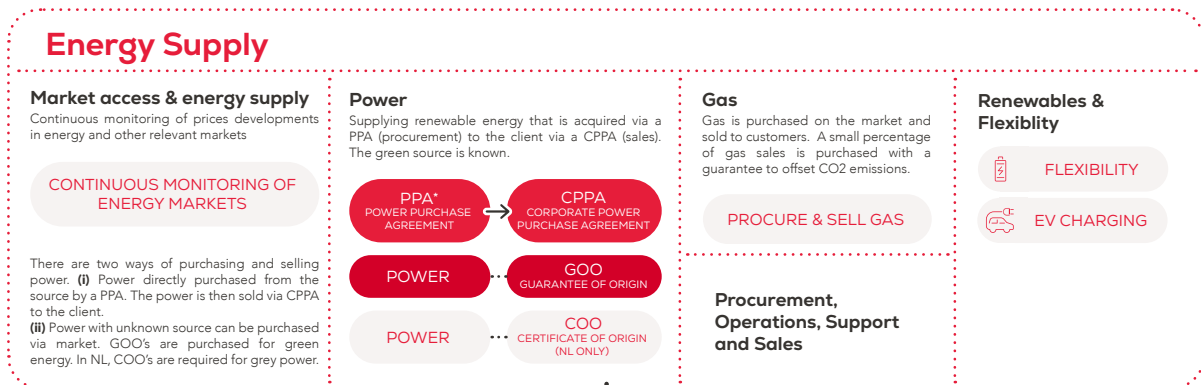
## Upstream



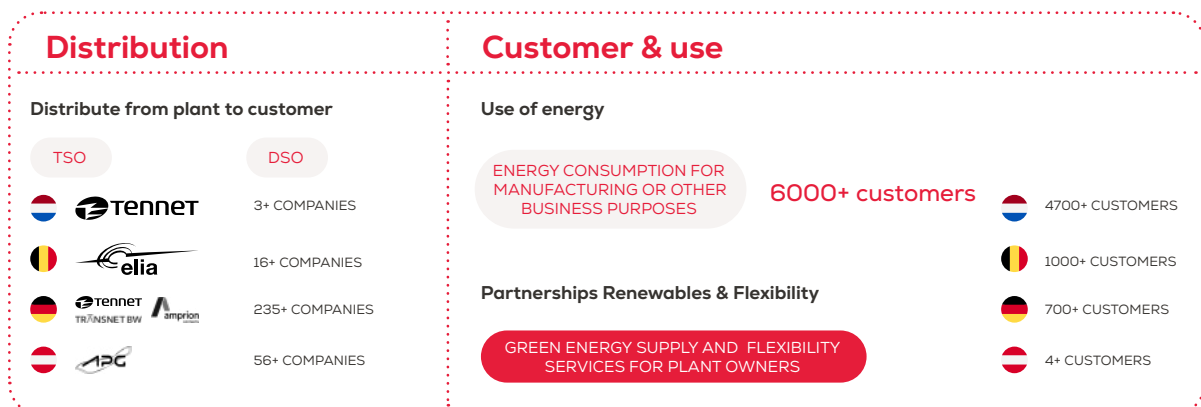
## Midstream



## Own operations



## Downstream



Scholt Energy has 3 joint ventures owning renewable energy assets and these are excluded from the scope (i.e. not material)  
The percentages correspond to the share of kWh in the Netherlands.

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## SUSTAINABILITY STRATEGY & GOVERNANCE



# SUSTAINABILITY STRATEGY & GOVERNANCE

At Scholt Energy, we do not view sustainability as a separate pillar, but as an integral part of our business operations and strategy. Our role as an energy supplier comes with responsibility: we aim to support our customers in the transition to a low-carbon future, while actively contributing ourselves to a more sustainable energy system.

## Introduction

Our strategy provides direction for the decisions we make today and the path we aim to pursue together with our customers, partners, and employees. In an energy market that is rapidly evolving, with increasing pressure to accelerate sustainability, it is essential to be clear about our vision, mission and objectives. The foundation of our strategy is built on a combination of ambition, realism, and personal commitment. It serves as our compass for sustainable growth, enabling us to accelerate the energy transition by supporting and encouraging customers in their own choices.

## Mission

Scholt Energy is committed to a future in which climate-neutral energy is accessible and achievable for all businesses. We believe that the energy transition can only succeed if it is shaped together: by collaborating with our customers, advising them on sustainable choices, and providing the right solutions. The ultimate decision on sustainability always rests with the customer, but we ensure that the opportunities and benefits are clear and accessible.

## Vision

We strive for an energy supply that is reliable, affordable and sustainable. Through strong partnerships and innovative solutions, we create value by supporting businesses on their transition journey while simultaneously contributing to a climate-neutral society.

## Strategic pillars (2025–2030)

Scholt Energy has translated its mission and vision for the coming years into three strategic pillars guiding the period 2025–2030.



The first pillar focuses on **accelerating the energy transition**, always in collaboration with our customers. We do this by maximizing the use of renewable energy and smart flexibility solutions. We advise customers on their sustainability choices without making the decisions for them, actively responding to ESG trends and evolving market demands.



The second pillar emphasizes **sustainable growth in the market**. We enter and scale in markets with high potential and expand our product and service offerings, ensuring that customers have access to solutions tailored to their individual circumstances and ambitions.



The third pillar is about **strengthening our organization and relationships**. Attracting and retaining talented professionals is central, along with building balanced teams and a scalable organization. At the same time, we continuously invest in digital resilience and high-quality service delivery to ensure we maintain prepared for the challenges of the future.

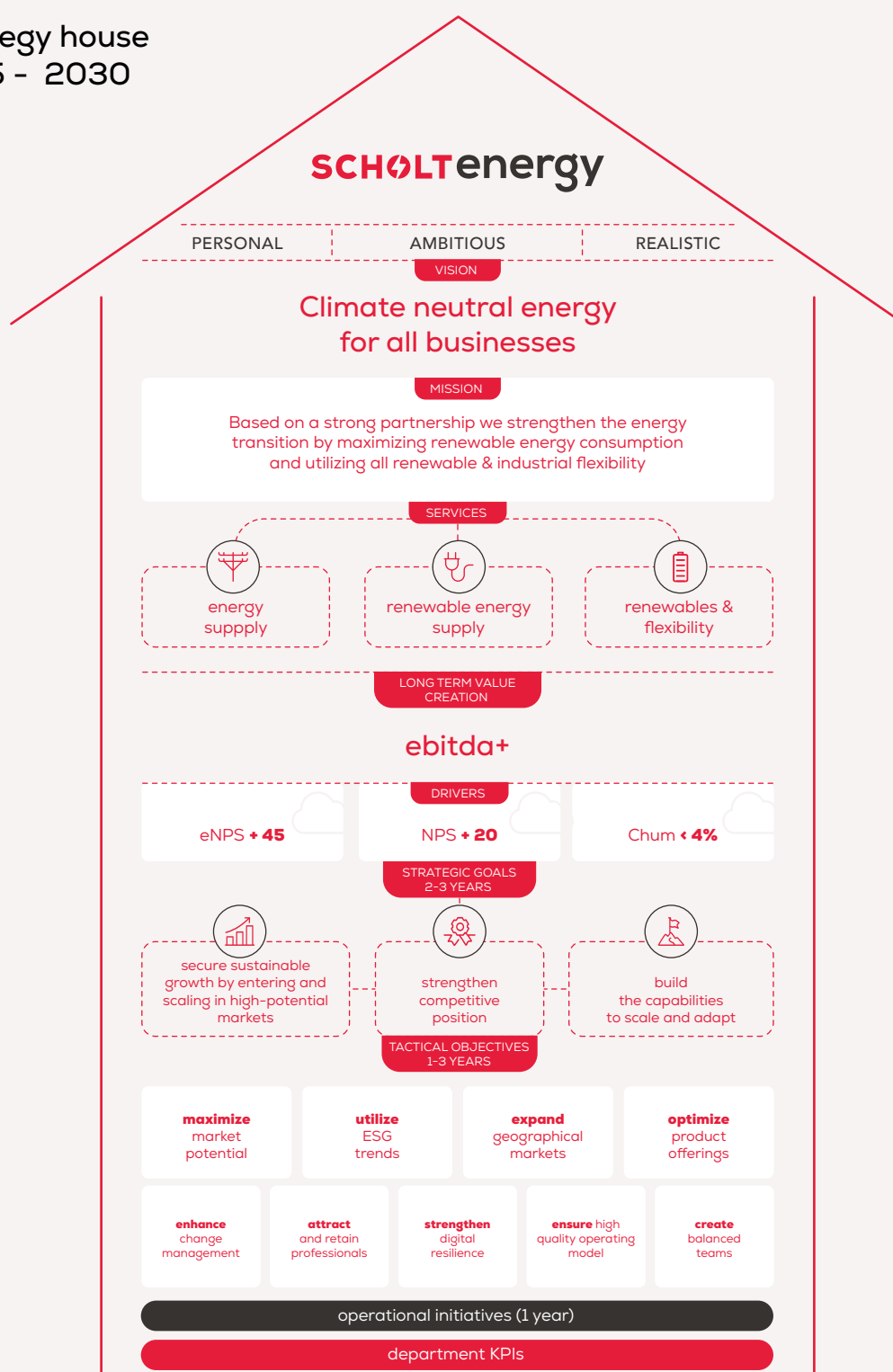


## Tactical Goals

In the next three years we will focus on 4 tactical objectives from a sustainability perspective:

1. We aim to further increase the share of renewable energy supply in our portfolio.
2. We are developing new services to help customers manage their energy consumption more flexibly and sustainably.
3. We will expand our geographical presence to support and encourage even more businesses in their sustainability journey.
4. We will utilize ESG developments for new products and services to accelerate the energy transition.

## Strategy house 2025 - 2030



# SUSTAINABILITY POLICY & INTEGRATION INTO BUSINESS OPERATIONS

At Scholt Energy, sustainability is an integral part of our strategy and day-to-day operations. We recognize that our activities impact people, the environment, and society, and we are trying to continuously minimize this impact where we are able to. Our sustainability (ESG) policy forms the foundation for all decisions and projects, and is fully integrated into our business processes.

## Sustainability vision and mission

Our sustainability vision focuses on balancing environmental responsibility, societal value and economic performance. This means we do not only prioritize profitability but also value responsible use of natural resources, reducing CO<sub>2</sub> emissions, and fostering a safe and healthy workplace for our employees.

Our mission is clear: sustainability is an integral part of our daily work, and reflected in product development, energy efficiency initiatives, responsible sourcing, and an ongoing dialogue with stakeholders and customers on sustainability matters.

## Policy framework and guidelines

Scholt Energy has established a formal sustainability (ESG) policy with concrete objectives, measurable KPIs, and clearly defined responsibilities throughout the organization. Key pillars include:

- 1. Environmental:** reducing energy consumption and CO<sub>2</sub> emissions, minimizing waste, and promoting circular processes.
- 2. Social:** investing in employee well-being, diversity and inclusion, and local community engagement.
- 3. Supply chain:** sustainable procurement, having conversations with suppliers about ethical business practices.
- 4. Governance:** sound governance criteria for achieving long term success and creating value for stakeholders.



# GOVERNANCE STRUCTURE

A solid governance structure forms the foundation of how Scholt Energy embeds sustainability and accountability within the organization. Good governance goes beyond oversight alone: it encompasses transparency, integrity, stakeholder engagement, and a culture of continuous improvement.

Within our governance approach, ESG is firmly embedded in our decision-making and daily operations. The Management Board provides strategic direction, while specific roles such as the Chief Sustainability Officer and ESG Officer ensure implementation, monitoring, and compliance. Through clear responsibilities, transparent reporting, and external assurance, sustainability is safeguarded as not just an ambition, but as a concrete and verifiable part of our strategy and operations.

## Supervisory oversight

The Management Board holds ultimate responsibility for ESG and ensures the integration of sustainability into the strategy and decision-making. A Chief Sustainability Officer (CSO) has been appointed to oversee the integration of ESG into the corporate strategy. In addition, the ESG Officer monitors daily implementation and compliance with the sustainability (ESG) policy, and reports periodically to the Management Board.

## Transparency and accountability

Scholt Energy aims for maximum transparency by publishing an annual Sustainability Report, aligned as much as possible with the Corporate Sustainability Reporting Directive (CSRD). ESG performance is measured through clear KPIs, which are reviewed at least quarterly by the ESG Officer and reported back to the Management Board.





## Integrity and compliance

Integrity is a core value within our governance structure. All employees, contractors, and suppliers fall within the scope of our Code of Conduct, which clearly sets out expectations and behavioral standards. In addition, strict anti-corruption and anti-bribery measures are implemented to prevent misconduct. In cases of doubt or potential violations, an anonymous whistleblower channel allows employees to safely report concerns. Below is an overview of all relevant policies applied within Scholt Energy:

” Integrity is a core value within our governance structure. ”

Policy	Goal
Risk & Control Framework	Description of the risk & control structure and its key components
Scholt Energy Business Principles	Definition of core principles, values and behaviors
Code of Conduct	Outline of clear behavioral standards for all stakeholders
Anti-Bribery and Anti-Corruption Policy	Prevention of unethical business practices
ESG Policy	Integration of ESG principles into objectives, strategy and operations
Growth, Development & Rewards	Growth, development and rewards for employees
Information Security & Privacy Policy	Safeguarding digital & physical information including data protection
Sanctions Policy	Compliance with national and international sanctions
Risk Management Policy	Description of the risk management structure and its key components
Whistleblower Policy	Internal reporting of any unethical or suspected criminal behavior

## Stakeholder- and supply chain governance

Stakeholders are actively involved in the supply chain governance through double materiality assessments. This ensures that relevant ESG themes are identified in a timely manner and incorporated into strategic decisions. Strict ESG criteria also apply to the supply chain: suppliers are assessed on their performance and transparency, and they must comply with clear requirements regarding environment, social responsibility, and governance. For key suppliers, due diligence processes are conducted to identify and actively manage potential risks.

## Continuous improvement

Scholt Energy views governance as a dynamic system, continuously adapting to changing regulations, sector standards, and stakeholder expectations. The ESG policy is therefore regularly reviewed and refined. Employees also receive training and support to apply ESG principles in their daily work. This ensures that sustainability is structurally embedded in our organizational culture and operations.

# RISK MANAGEMENT & COMPLIANCE

Scholt Energy fully integrates risk management and compliance into the execution of our sustainability strategy. Central to this approach is the double materiality analysis, which identifies both the impact of our organization on people and the environment, and the impact of external sustainability developments on our organization. This analysis guides the identification, assessment, and prioritization of sustainability risks, such as climate change, regulatory changes, reputational risks, and supply chain risks.

The scope of the double materiality analysis includes the following:

- **Impact materiality:** We assess how our activities affect society and the environment, such as CO<sub>2</sub> emissions, water usage, and human rights in the supply chain.
- **Financial materiality:** We analyze how external sustainability risks, such as regulations, climate change, and societal expectations, affect our financial performance and business continuity.

We ensure compliance with relevant legislation and regulations, including the Corporate Sustainability Reporting Directive (CSRD) and the EU Taxonomy. Internal controls and procedures

safeguard the quality, completeness, and reliability of sustainability data. In addition, independent audits and periodic reviews support continuous improvement and enhance stakeholder trust.

By fully integrating risk management and compliance to the double materiality analysis, we increase the resilience of our organization and strengthen our contribution to sustainable value creation for both society and the company.



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# MATERIAL TOPICS AND STAKEHOLDER DIALOGUE





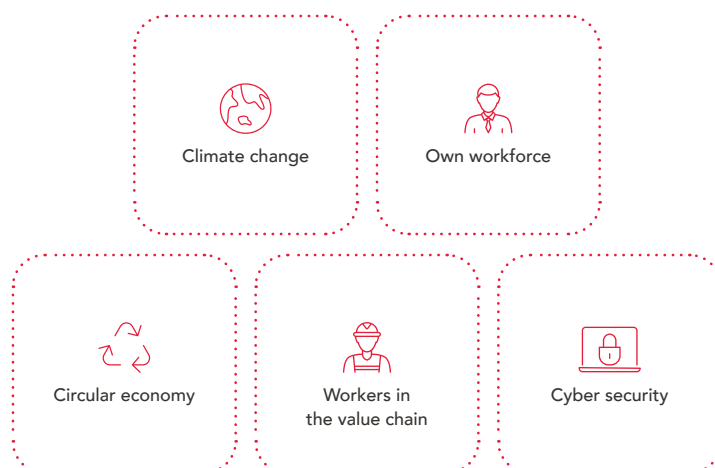
# MATERIAL TOPICS

Our sustainability strategy is built on a double materiality analysis, assessing impacts, risks, and opportunities. The outcomes form the foundation for actions, mitigating measures, and long-term strategy. As noted, we examine both impact materiality and financial materiality.

From our double materiality analysis, the following topics have been identified as material for Scholt Energy:

1. Climate Change
2. Own Workforce
3. Circular Economy
4. Workers in the Value Chain
5. Cyber Security

” Our sustainability strategy is built on a double materiality analysis, assessing impacts, risks, and opportunities. ”



# STAKEHOLDER ENGAGEMENT PROCESS

At Scholt Energy, we recognize that sustainable growth is only possible through active collaboration with our stakeholders. Our stakeholder engagement process is designed around transparency, dialogue, and mutual understanding, ensuring that our sustainability initiatives align with societal expectations.

## Identification and analysis of stakeholders

The analysis has been conducted with input from both internal and external stakeholders. Internally, managers from various departments participated, with final approval from the Management Board. Externally, input was gathered from local governments, suppliers, and other relevant parties. This broad involvement has enabled us to accurately map stakeholder interests, concerns, and expectations.

## Dialogue and integration of feedback

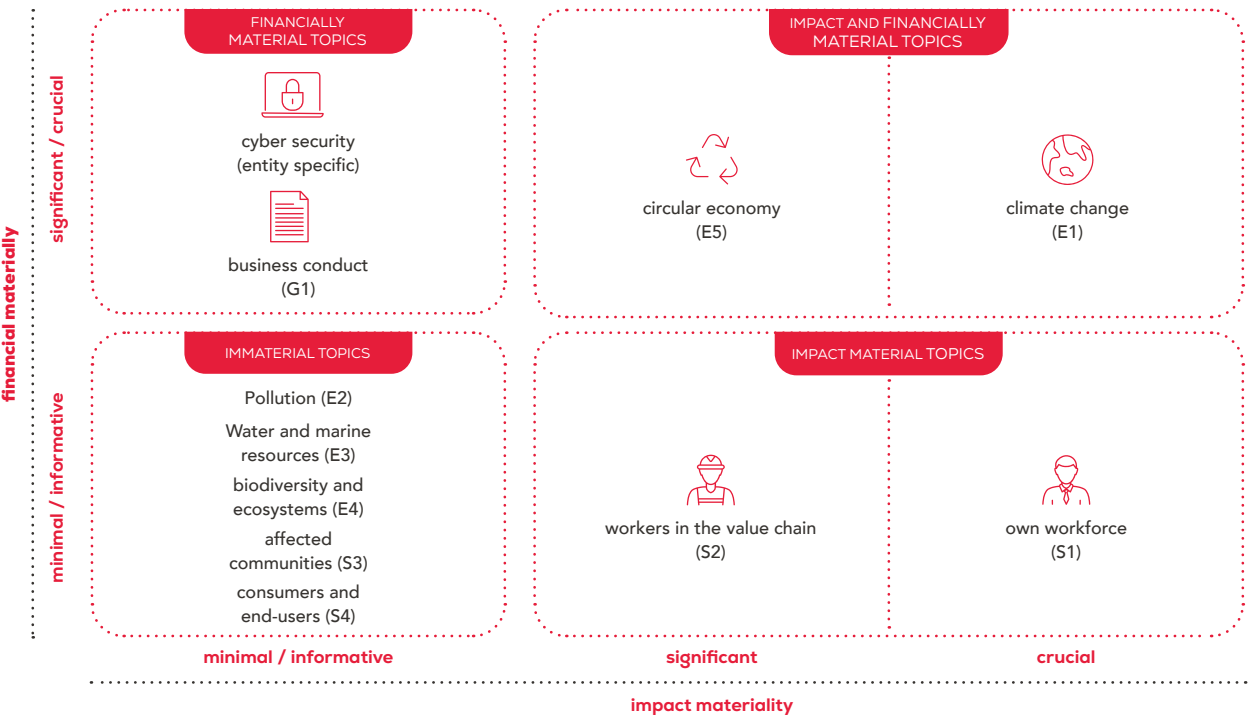
Collected input forms the foundation of our policies and sustainability strategies. Through workshops, interviews, and regular meetings, we ensure active stakeholder participation. Their insights are used to set goals, develop policies, and monitor performance, resulting in concrete actions and measurable improvements.

## Materiality matrix results

The materiality matrix illustrates the topics most relevant to both our organization and stakeholders (ref. figure below).

Scholt Energy has carefully determined the topics where we can make real impact, particularly **Climate Change, Own Workforce and Cyber Security**. Therefore, this sustainability report mainly focuses on these three key areas.

” Sustainable growth is only possible through active collaboration with our stakeholders. ”



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## CLIMATE CHANGE



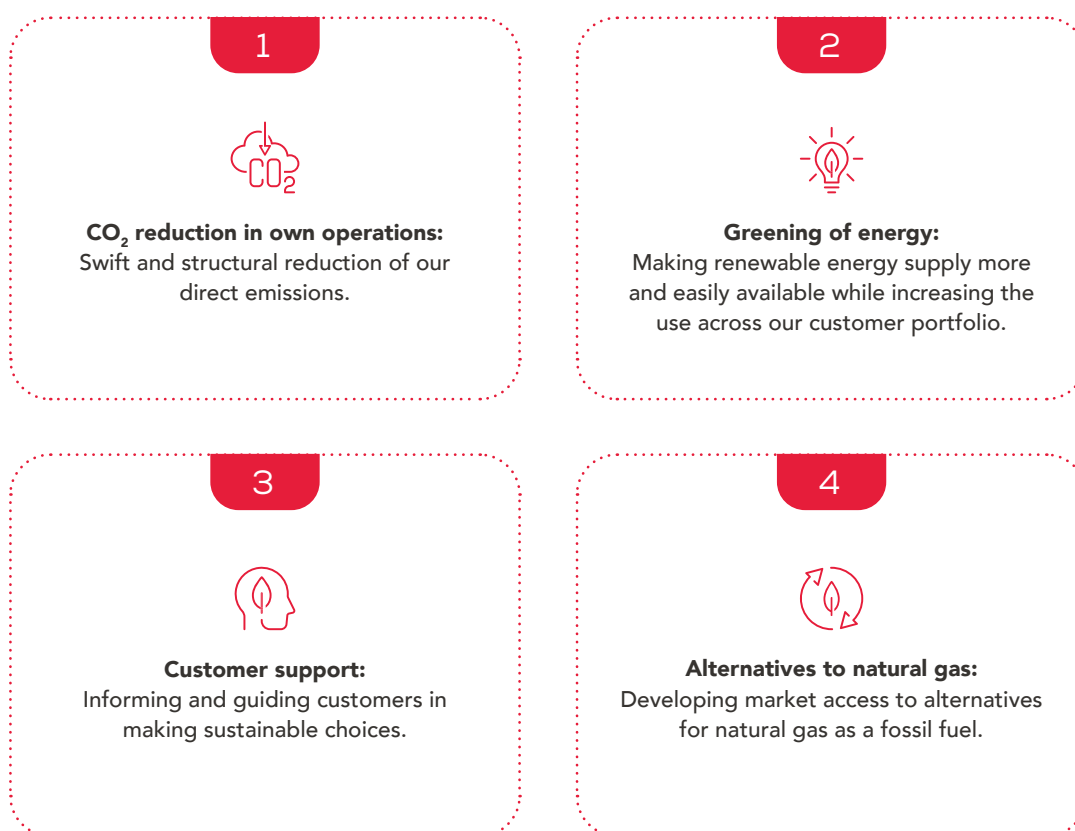


# CLIMATE CHANGE

Climate change is central to Scholt Energy's mission and vision. We strive to create a positive impact by taking actions that combat climate change and accelerate the energy transition. As a reliable partner, we actively support our customers in addressing their sustainability challenges and contribute to a future with clean and affordable energy.

## TRANSITION PLAN

Our transition plan focuses on four pillars:



Since 2024, Scholt Energy has implemented a concrete reduction plan to lower its own CO<sub>2</sub> emissions. Key measures are as follows:

- **Mobility:** Almost 100% of new company lease cars, in The Netherlands and Belgium, are electric, while the lease car fleet in Germany is mainly hybrid based.
- **Real estate:** Relocation to a gas-free office building in the Netherlands, reducing the natural gas usage at our locations to 0 m<sup>3</sup>.
- **Energy consumption:** 100% of electricity for our own use in the Netherlands is sourced from renewable energy.

These measures significantly reduce our Scope 1 and 2 emissions. For monitoring purposes, we use the spend-based method, transitioning gradually to the activity-based method in the coming years for greater accuracy. We monitor our renewable energy supply (MWh) and available flexibility capacity (MW) on a monthly basis for performance management purposes.

# STRATEGY



Our long-term strategy focuses on achieving market access to climate-neutral energy for all our business customers. Concretely, this means increasing our share of green electricity sales and exploring alternatives to natural gas, thereby reducing negative impact and lowering the CO<sub>2</sub> intensity of our activities.

We recognize that customers ultimately decide their course of action. As a trusted energy partner, we provide practical solutions and strategic advice to guide their energy transition efforts. In this way, we help customers achieve their sustainability goals while jointly contributing to an accelerated energy transition.

The energy market is constantly evolving, and we adapt our strategy accordingly. By closely monitoring market developments and customer needs, we develop new business models and remain relevant in a rapidly changing sector.



# KPIs AND TARGETS

In order to measure climate impact we use the following KPIs and targets:

## **CO<sub>2</sub> Emission Reduction KPIs:**

- Scope 1 & 2:
  - 60% CO<sub>2</sub> reduction by 2030 vs. baseline year 2024.
  - Net-zero in 2035.
- Scope 3:
  - 20% CO<sub>2</sub> intensity per kWh by 2030 vs. baseline year 2024.

The baseline year is 2024 as earlier years were strongly influenced by external factors such as the energy crisis and the COVID pandemic. For Scope 3 purposes, we use an intensity-based target as customer behavior and their decision-making are outside our direct control.

## **Complementary KPIs:**

- Share of renewable energy supply (%) with an annual target.
- Installed Flexibility Capacity (MW) with an annual target.
- EcoVadis Assessment Score with 2030 target

In 2024 Scholt Energy began an EcoVadis assessment to establish a baseline for our overall sustainability performance, resulting in a score of 44. EcoVadis is a globally recognized assessment platform that evaluates companies on environment, labor & human rights, ethics, and sustainable procurement. Scores range from 0 to 100 and are translated into medal classes: bronze, silver, gold, or platinum. Our goal for the coming years (2030) is to achieve at least a bronze EcoVadis medal, placing Scholt Energy in the top 50% of assessed companies and demonstrating that sustainability is structurally embedded in our operations.






# PERFORMANCE & PROGRESS

An overview of the actual CO<sub>2</sub> emissions in 2024 is as follows:



Scope	Description	Actual 2024 (tCO2)
Scope 1	Direct emissions from Scholt Energy owned sources	415
Scope 2	Indirect emissions from purchased energy and internal used energy based on market methods	59
Scope 3	Indirect emissions from value chain activities outside Scholt Energy's direct control. This is the emission from sources not owned by Scholt Energy and therefore not directly influenced by the company (such as purchased materials and customer consumption).	5.141.724

Table: Actual CO<sub>2</sub> emissions 2024

Emissions in **Scope 1 and 2** are mainly caused by:

-  The fleet of company vehicles (lease cars) which is currently in transition to electric vehicles.
-  Heating of our offices.
-  Electricity consumption in our offices.

Since early 2024, all electricity for our offices has been sourced from renewable energy, significantly reducing these emissions. The majority of our **Scope 3** emissions originate from customer use of natural gas and non-renewable electricity which is subdivided into:

-  Category 3: Fuel- and energy-related activities
-  Category 11: Use of sold products

Significant Scope 3 Emissions	Actual 2024 (tCO2)
1. Purchased goods and services	410.383
2. Capital goods	45
3. Fuel- and energy-related activities (not included in scope 1 or 2)	2.966.045
4. Upstream transportation and distribution	8
5. Waste generated in operations	6
6. Business travel	30
7. Employee commuting	387
8. Upstream leased assets	492
9. Downstream transportation and distribution	102.119
10. Processing of sold products	-
11. Use of sold products	1.662.210
12. End-of-life treatment of sold products	-
13. Downstream leased assets	-
14. Franchises	-
15. Investments	-
Total Scope 3 Emissions	5.141.725

Table: Actual scope 3 emissions per category

The CO<sub>2</sub> intensity is as follows:

CO2 Intensity	Actual 2024 (tCO2)
Per MWh	0,19167

Table: CO<sub>2</sub> Intensity 2024

In addition to CO<sub>2</sub> emission reduction KPIs and targets, Scholt Energy tracks the following complementary KPIs that contribute positively to the environment:

Complementary KPIs	Actual 2024
Share of renewable energy supply (%)	18% (actual ) vs. 12% (target)
Installed Flexibility Capacity (MW)	1177 MW (actual) vs. 600 MW (target)
EcoVadis Score	44 (actual)

Table: Complementary KPIs

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## OWN WORKFORCE





# OWN WORKFORCE

As of December 31, 2024, Scholt Energy employed a total of 421 people, across the Netherlands, Germany, Belgium, and Austria, representing 401.44 FTEs. The workforce consisted of 74.1% men and 25.9% women, with the highest female representation in Belgium (29.4%) and Austria (33.3%).

Country	FTE	Headcount			Headcount in %	
		Male	Female	Total	Male	Female
Netherlands	208	162	53	215	75,3%	24,7%
Germany	109,04	84	27	111	75,7%	24,3%
Belgium	32,34	24	10	34	70,6%	29,4%
Austria	7,8	6	3	9	66,7%	33,3%
<b>Total</b>	<b>357,18</b>	<b>276</b>	<b>93</b>	<b>369</b>	<b>74,8%</b>	<b>25,2%</b>

Table: Overview of Scholt Energy's workforce distribution by country, headcount, and gender.

## DIVERSITY

Scholt Energy is aware of the traditionally male-dominated energy sector and actively promotes equal opportunities and fair treatment for all employees. Although no formal diversity policy exists yet, we report annually to the Dutch Social and Economic Council (SER) on diversity within our (sub)top management.

In 2024, our Management Board consisted entirely of men, while 24.5% of other management positions were held by women.

	2024			
	Male	Female	Other	Total
Managing Board	100%	0%	0%	5
Other Management Positions	75,5%	24,5%	0%	53

Table: Male-Female diversity in Management positions in 2024

## PAY-GAP ANALYSIS

The unadjusted pay gap in 2024 was measured at 14.2% which is slightly above the European average of 12%. Starting in 2025, Scholt Energy will conduct an adjusted pay-gap analysis annually to identify structural differences in pay between men and women. This analysis will account for factors such as role, experience, and working hours, providing a more accurate picture.

## STABILITY & WELL-BEING

In addition to diversity, Scholt Energy places emphasis on employee stability and well-being. Despite rapid growth, staff turnover was 7.9%, significantly lower than the market average. Absenteeism was only 2.5%, while the Employee Net Promoter Score (eNPS) reached an excellent 45, with a response rate of 82%. These figures highlight employee engagement and satisfaction, reinforcing our commitment to a healthy and stable working environment.

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# CYBERSECURITY





# CYBERSECURITY

The continuity and reliability of our services largely depend on robust information security. Scholt Energy has established a comprehensive policy on information security, privacy and cybersecurity. This policy is reviewed annually and forms an essential part of our broader sustainability strategy.

## APPROACH

At Scholt Energy we place high value on information security as a cornerstone of our business operations and societal responsibility. Our approach is built on three core principles:

- Availability
- Integrity
- Confidentiality

We are committed to protecting corporate and customer data through a robust combination of administrative, technical, and physical safeguards. These include strict access controls, password management, firewalls, malware protection, and regular backups. To ensure business continuity, we implement measures such as backup power supplies and system monitoring. We continuously invest in technical, organizational, and policy-based controls to manage risks and prevent incidents. Our customers, partners, and employees must be able to trust that information is processed, stored, and exchanged securely.

## AWARENESS

Recognizing that the human factor often represents a vulnerability, we prioritize awareness and training across the organization. All employees participate in regular cybersecurity education and phishing simulations, empowering them to identify threats and report incidents swiftly. Handling confidential information is a shared responsibility, embedded in our culture.

We also enforce a strict access management policy and monitor the effectiveness of our security measures to ensure continuous improvement.

## IT RISK MANAGEMENT

Our IT department plays a central role in maintaining and enhancing our security posture. They oversee continuous system monitoring, ensure timely updates of applications, investigate incidents, and proactively inform employees of emerging threats. In the event of incidents such as phishing or data breaches, we follow clear procedures to mitigate risks and ensure compliance with applicable laws and regulations, including the GDPR data breach notification requirement. In addition, we conduct periodic risk assessments and are actively structuring and professionalizing our processes with the goal of achieving ISO 27001 certification. This internationally recognized standard provides a proven framework for organizing and demonstrating effective information security.

## REGULATORY READINESS

We are also preparing for the requirements of the NIS2 directive, which raises the bar for the security and continuity of essential and critical services. Our governance, processes, and technical measures are being aligned with these obligations to ensure compliance and resilience.







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**SCHOLTenergy**

December 9, 2025