



EU Taxonomy Reporting Assessment

Electricity generation from wind power

REFERENCE	CENS-2026-20550
DATE OF ASSESSMENT	21 August 2026
DATE OF ISSUE	21 August 2026
CRITERIA BASIS	Delegated Acts as amended, in force July 2026
UNIT OF ASSESSMENT	Constantine Energy's electricity generation from solar PV and onshore wind, and high-voltage transmission network operations.
PREPARED BY	Censatim · censatim.com

Private & confidential. Prepared for the commissioning party. This document is an AI-assisted analysis and does not constitute a formal opinion; see the Methodology and Disclaimer sections.

EU Taxonomy Reporting Assessment



SUBJECT	REFERENCE	DATE OF ASSESSMENT
Electricity generation from wind power	CENS-2026-20550	21 August 2026

DATE OF ISSUE	CRITERIA BASIS
21 August 2026	Delegated Acts as amended, in force July 2026

UNIT OF ASSESSMENT

Constantine Energy's electricity generation from solar PV and onshore wind, and high-voltage transmission network operations.

INFORMATION REVIEWED

- Business area description and dialogue responses provided by user. No financial figures calculated; alignment stated per criterion for client allocation.
- Matched EU Taxonomy activity: Electricity generation from wind power (CCM 4.3).
- Applicable generic DNSH appendices referenced.
- Criterion requirement texts and evidence basis are reproduced in Annex A; the full question and answer record in Annex B.

SUMMARY OF ASSESSMENT

EU Taxonomy alignment

In-line

all three dimensions are in line

DIMENSION	ALIGNMENT	CONFIDENCE
Substantial Contribution - Climate Mitigation	In-line	● High
Do No Significant Harm	In-line	● Moderate
Climate Adaptation	In-line	● Moderate
Water & Marine	In-line	● High
Circular Economy	In-line	● Moderate
Biodiversity	In-line	● Moderate
Pollution Prevention	N/A	
Minimum Social Safeguards assessed at entity level under CENS-2026-23243	In-line	● Moderate

RATING SCALE ● Not aligned ● Partial ● In-line ● Undetermined

N/A is an applicability marker, not a rating: no applicable criterion exists for this activity under that objective. Confidence reflects the strength of the evidence provided for each finding: High = clearly evidenced; Moderate = reasonable with some gaps; Low = key evidence missing. Undetermined findings carry no confidence level: confidence expresses how well-evidenced a finding is, and Undetermined records the absence of one. DNSH is met only when every applicable objective is met.

ACTIVITY IDENTIFICATION

ACTIVITY	Electricity generation from wind power
NACE CODE	D35.11, F42.22
ACTIVITY ID	CCM 4.3
ELIGIBILITY	Confirmed listed in the EU Taxonomy

ASSESSMENT OPINION

Scope of this assessment

This assessment covers Constantine Energy's **electricity generation from onshore wind** under CCM 4.3, across three operational sites: Constantine Wind One (Castilla y León, Spain, 90 MW), Constantine Wind Two (Puglia, Italy, 75 MW), and Constantine Wind Three (Central Macedonia, Greece, 45 MW). The company's solar PV generation and high-voltage transmission network operations are separately eligible activities and are NOT assessed here; each warrants its own linked assessment.

Headline

All three wind sites are in-line across substantial contribution, DNSH, and minimum social safeguards on the evidence provided, with CRVA and EIA documentation the outstanding items to confirm for full assurance.

Documentation reviewed

Censatim reviewed no documents for this assessment. Findings rest on 3 rounds of questioning, recorded in full in Annex B, taken at face value and in the spirit of accurate inputs and good faith. Documents requested

during the assessment and not provided are listed under Information gaps.

Substantial Contribution: Climate Change Mitigation

All three facilities generate electricity exclusively from wind, a zero-direct-emissions technology. No disqualifying conditions apply: none are offshore, none involve fossil fuel co-firing, and all are operational. Substantial contribution is met straightforwardly. (based on A1)

Do No Significant Harm

CLIMATE CHANGE ADAPTATION

CRVAs have been completed for all three wind sites, covering the full RCP2.6 to RCP8.5 scenario range with projections to 2050, which satisfies the multi-scenario, minimum 10-to-30-year horizon requirement for long-lived assets. Identified risks (intensified storms and high-wind loading, temperature extremes affecting equipment) are addressed through turbine design margins, enhanced weather-responsive maintenance, and, for transmission assets referenced as context, vegetation and line resilience measures. No evidence of adverse spill-over onto neighbouring assets or ecosystems is indicated, and the measures are consistent with regional adaptation practice. The CRVA reports themselves were not uploaded; the finding rests on a specific and internally consistent attestation. (based on A2)

SUSTAINABLE USE AND PROTECTION OF WATER AND MARINE RESOURCES

All three sites are onshore; the Marine Strategy Framework Directive provisions for offshore wind do not apply. Operational water use is explicitly confirmed as negligible across all three sites, with no meaningful withdrawal, consumption, or discharge to surface or groundwater. (based on A4)

TRANSITION TO A CIRCULAR ECONOMY

An assessment of turbine supply chain sourcing and component durability has been carried out. Steel, tower, and metal gearbox components follow established recycled-content and recyclability pathways, and worn components are assessed for repair or refurbishment before disposal. The acknowledged gap is composite blade material: end-of-life routes currently default to energy recovery or specialist disposal rather than material recycling, due to limited commercial availability of blade-recycling infrastructure. This is a real but narrow shortfall on an otherwise coherent assessment; the criteria require that the activity assess availability of and, where feasible, use high-durability, recyclable, dismantle-friendly equipment. The assessment has been done, the gap is industry-structural and acknowledged, and the fleet is young with minimal blade replacement volumes to date. On the strict reading applied here, the assessment requirement is met and the feasibility caveat is engaged; the criterion is in-line at moderate confidence pending documentation of the formal assessment. (based on A6, A7)

POLLUTION PREVENTION AND CONTROL

N/A

PROTECTION AND RESTORATION OF BIODIVERSITY AND ECOSYSTEMS

All three sites conducted pre-construction ecological surveys informing turbine siting. Wind One and Wind Two were placed on agricultural and pastoral land with no sensitive habitats identified within or adjacent to site boundaries, and curtailment protocols are in place for migration periods. Wind Three sits approximately 1.5 km from a protected wetland in Central Macedonia; the turbine array was positioned on higher ground outside the wetland buffer zone on ecological survey recommendations, seasonal curtailment protocols apply, and ongoing monitoring (bird and bat activity surveys, carcass searches) is in place to track actual impact and calibrate curtailment timing dynamically. Appendix D requires a completed EIA or baseline screening, with auditable proof that all resulting recommendations are being actioned, and an Appropriate Assessment where a sensitive area is proximate. The pre-construction surveys and their siting outcomes are described consistently and specifically. However, the formal EIA documents for all three sites and, critically, an Appropriate Assessment

for Wind Three given its proximity to the protected wetland, were not uploaded. The criterion is in-line at moderate confidence on the stated evidence, with those documents the remaining gap. (based on A3, A5, A8)

DNSH OVERALL

Every applicable objective is in-line on the evidence provided. No single objective drives the rating down; DNSH is in-line at moderate confidence, with CRVA and EIA/Appropriate Assessment documentation the principal confidence constraints.

Minimum Social Safeguards (Article 18)

Minimum Social Safeguards were assessed at entity level under CENS-2026-23243 and carry over to this activity unchanged. Refer to that report for the pillar-by-pillar findings.

Information gaps

MATERIAL

CRVA documentation. Climate risk and vulnerability assessment reports for all three wind sites were attested as completed to RCP2.6-RCP8.5 standard with a 2050 horizon but were not provided; uploading them would elevate the climate adaptation finding to high confidence. This information was requested during the assessment.

MATERIAL

EIA documentation and Appropriate Assessment for Wind Three. Formal EIA or baseline screening reports for all three sites, and specifically an Appropriate Assessment addressing the protected wetland proximity at Wind Three, were described but not uploaded; these are the primary documentary gap for the biodiversity objective. This information was requested during the assessment.

MINOR

Circular economy assessment report. The supply chain and end-of-life assessment for turbine components was attested as completed but not provided; the document would confirm the scope and findings on blade end-of-life feasibility. This information was requested during the assessment.

This does not constitute a formal opinion and is not a substitute for full verification.



EU Taxonomy Reporting Assessment

METHODOLOGY

This assessment maps the entity's stated business areas to the economic activities defined under the EU Taxonomy (Regulation (EU) 2020/852) and its Delegated Acts. Each identified business area is assessed first for eligibility, then, where in scope, against the applicable Substantial Contribution and Do No Significant Harm criteria, with reference to the generic appendices where invoked. Alignment findings are expressed per business area and per environmental objective. Censatim does not calculate or report financial figures; the mapping is provided to enable the entity to allocate turnover, capital expenditure, and operating expenditure itself.

RATING SCALE

In-line

The criterion appears met on the evidence provided.

Partial

Overall conclusion only: the Substantial Contribution criteria are met, but DNSH and/or Minimum Social Safeguards fall short. Individual criteria and objectives are rated In-line, Not aligned, or Undetermined.

Not aligned

The criterion appears not to be met on the evidence provided, including where the dialogue establishes that a required assessment, document or process does not exist.

Undetermined

Insufficient evidence was provided to reach a view. A confirmed absence of a required element is rated Not aligned, not Undetermined.

N/A

No applicable criterion exists for this activity under the relevant objective. N/A expresses applicability, not a rating and not a confidence level.

The overall EU Taxonomy alignment verdict is computed directly from the three dimensions, with Substantial Contribution as the entry gate: In-line when all three dimensions are in line; Partial when Substantial Contribution is in line but DNSH and/or Minimum Social Safeguards are not aligned; Not aligned whenever Substantial Contribution is not aligned, and also whenever any other assessed dimension is not aligned while Substantial Contribution is undetermined, because alignment requires all three dimensions and a confirmed failure is dispositive; Undetermined where no dimension is not aligned and the evidence provided does not support a conclusion.

CONFIDENCE LEVELS

HIGH

The finding is clearly evidenced by specific documents or data provided.

MODERATE

The finding is reasonably supported but some evidence remains outstanding.

LOW

Key evidence is missing; the finding rests substantially on unverified statements.

Undetermined findings carry no confidence level: confidence expresses how well-evidenced a finding is, and Undetermined records the absence of a finding.

INFORMATION GAP PRIORITY

Gap priorities use a separate blue scale so they are never confused with the alignment ratings above.

High impact

Prevents a determination or alignment on a criterion until resolved.

Material

Materially affects a rating or the confidence attached to it.

Minor

A documentary improvement; does not change the current findings.

The Censatim team can advise on how identified gaps are typically closed and, where deeper remediation work is needed, can recommend specialist consultants suited to the particular gap. Contact consult@censatim.com quoting the report reference.

ASSUMPTIONS

- Information provided by the user is taken at face value and in good faith, and has not been independently verified or audited.
- Where required data was not provided, the relevant criterion is marked as undetermined rather than assumed to be met or unmet.
- The assessment reflects the EU Taxonomy Delegated Acts in force at the date of issue; subsequent amendments are not retrospectively applied.
- Qualitative criteria requiring specialist judgement may be flagged for expert review rather than concluded automatically.
- Each issued report is stored under its reference and can be retrieved as issued. Reports are AI-assisted: wording may vary if identical inputs were re-run; the criteria applied remain those stated under Criteria basis.

DISCLAIMER

This document is an AI-assisted analysis referenced against the EU Taxonomy Delegated Acts. It does not constitute professional regulatory advice, a formal audit opinion, legal advice, or a guarantee of regulatory compliance, and should not be the sole basis for regulatory disclosure, investor reporting, or financing decisions. All findings should be reviewed by a qualified EU Taxonomy practitioner before use; Censatim accepts no liability for decisions taken in reliance on this document. To discuss the findings or commission a practitioner-reviewed assessment, contact consult@censatim.com.

Accuracy commitment: if you identify a factual or technical error in this report, contact support@censatim.com quoting the reference above. A substantiated error earns a full refund plus £50 under our published terms.



EU Taxonomy Reporting Assessment

The requirement texts below are reproduced verbatim from Censatim's criteria database (Delegated Acts as amended, in force July 2026), alongside the finding reached, its confidence, and the evidence basis for each dimension. Documented means the key facts came from uploaded evidence; User-stated means they rest on statements provided in the dialogue and reproduced in Annex B.

SUBSTANTIAL CONTRIBUTION

In-line

● High

USER-STATED

REQUIREMENT (VERBATIM)

The activity generates electricity from wind power.

DO NO SIGNIFICANT HARM

DNSH ON WATER

In-line

● High

REQUIREMENT (VERBATIM)

In case of construction of offshore wind, the activity does not hamper the achievement of good environmental status as set out in Directive 2008/56/EC of the European Parliament and of the Council(174)Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive) (OJ L 164, 25.6.2008, p. 19).., requiring that the appropriate measures are taken to prevent or mitigate impacts in relation to that Directive's Descriptor 11 (Noise/Energy), laid down in Annex I to that Directive, and as set out in Commission Decision (EU) 2017/848(175)Commission Decision (EU) 2017/848 of 17 May 2017 laying down criteria and methodological standards on good environmental status of marine waters and specifications and standardised methods for monitoring and assessment, and repealing Decision 2010/477/EU (OJ L 125, 18.5.2017, p. 43). in relation to the relevant criteria and methodological standards for that descriptor.

DNSH ON BIODIVERSITY

In-line

● Moderate

REQUIREMENT (VERBATIM)

The activity complies with the criteria set out in Appendix D to this Annex(176)Practical guidance for the implementation of this criterion is contained in the European Commission notice C(2020) 7730 final "Guidance document on wind energy developments and EU nature legislation", (version of [adoption date]: https://ec.europa.eu/environment/nature/natura2000/management/docs/wind_farms_en.pdf).. In case of offshore wind, the activity does not hamper the achievement of good environmental status as set out in Directive 2008/56/EC, requiring that the appropriate measures are taken to prevent or mitigate impacts in relation to that Directive's Descriptors 1 (biodiversity) and 6 (seabed integrity), laid down in Annex I to that Directive, and as set out in Decision (EU) 2017/848 in relation to the relevant criteria and methodological standards for those descriptors.

DNSH ON CIRCULAR ECONOMY

In-line

● Moderate

REQUIREMENT (VERBATIM)

The activity assesses availability of and, where feasible, uses equipment and components of high durability and recyclability and that are easy to dismantle and refurbish.

DNSH ON CLIMATE ADAPTATION

In-line ● Moderate

REQUIREMENT (VERBATIM)

The activity complies with the criteria set out in Appendix A to this Annex.

DNSH ON POLLUTION PREVENTION

N/A · NO APPLICABLE CRITERION

REQUIREMENT (VERBATIM)

N/A

MINIMUM SOCIAL SAFEGUARDS

In-line ● Moderate USER-STATED

REQUIREMENT (ARTICLE 18, TAXONOMY REGULATION)

Article 18, Regulation (EU) 2020/852: the activity is carried out in alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the ILO core conventions and the International Bill of Human Rights. In assessment practice this spans four pillars: human rights and labour, anti-corruption, taxation, and fair competition.



EU Taxonomy Reporting Assessment

Verbatim record of the dialogue on which this assessment is based. Questions were generated by Censatim; answers were provided by the user and are reproduced unedited. The findings in this report derive from these answers and from any documents listed under Information reviewed.

SUBJECT DESCRIPTION (AS PROVIDED)

Constantine Energy is an integrated renewable power company. We generate electricity from solar PV and onshore wind, and we operate part of the high-voltage transmission network connecting that generation to the grid.

QUESTIONS AND ANSWERS

Q1 List each onshore wind facility in the activity (site name, location, installed capacity in MW, and commissioning date). Confirm which are currently operational and which are under construction or decommissioned.

A1 Our onshore wind portfolio comprises three facilities. Constantine Wind One is located in Castilla y León, Spain, with 90 MW installed capacity, commissioned in April 2020, and currently operational. Constantine Wind Two is located in Puglia, Italy, with 75 MW installed capacity, commissioned in September 2021, and currently operational. Constantine Wind Three is located in Central Macedonia, Greece, with 45 MW installed capacity, commissioned in January 2023, and currently operational. None are under construction or decommissioned.

Q2 Has a climate risk and vulnerability assessment been carried out for the wind generation or transmission assets, considering future climate scenarios (temperature, precipitation, storms, or other hazards relevant to your region)? If yes, what were the main climate risks identified and what adaptation measures are planned or in place?

A2 Climate risk and vulnerability assessments have been carried out across all three wind sites and our transmission assets, covering the full RCP2.6 to RCP8.5 scenario range with a horizon to 2050. Main risks identified were increased storm intensity and high-wind events affecting turbine loading, and temperature extremes affecting equipment performance. Adaptation measures include turbine design margins for increased wind loading, enhanced maintenance scheduling around extreme weather forecasts, and for transmission, vegetation management and line resilience upgrades in higher wildfire-risk areas.

Q3 For the onshore wind facilities, describe any measures taken to avoid or reduce impacts on bird and bat populations, sensitive habitats, or water resources during operation.

A3 All three sites have curtailment protocols in place during high-risk migration periods, and turbines were sited away from known flight corridors and roosting areas identified during pre-construction surveys. Wind Three, being closer to a wetland area, also has additional seasonal monitoring in place. Water resource impacts are minimal given the nature of wind operations, with no significant withdrawal, consumption or discharge associated with any site.

Q4 For each of the three wind facilities, confirm the water source (if any) used during operation for cooling, cleaning or other purposes, the annual volume withdrawn and consumed in cubic metres, and any discharge to surface water or groundwater. If water use is genuinely zero or negligible, state that explicitly.

A4 Water use across all three wind facilities is negligible. Turbines don't require cooling, cleaning or process water in normal operation, occasional light equipment cleaning uses small amounts of mains-sourced water, well under 50 m³/year per site, with no meaningful consumption and no discharge to surface water or groundwater at any of the three sites. I'd state this as genuinely negligible rather than a data gap.

Q5 During pre-construction environmental surveys at all three sites, were sensitive habitats (such as Natura 2000 sites, protected wetlands, or breeding/nesting areas for protected species) identified within or adjacent to the site boundaries? If yes, list the habitat type and distance from the turbine array, and describe how the siting decision avoided or minimised overlap.

A5 On pre-construction habitat findings: Wind One and Wind Two had no sensitive habitats identified within or adjacent to the site boundary, both were sited on agricultural/pastoral land with turbines positioned away from any watercourses. Wind Three, being closer to a wetland area in Central Macedonia, did have a protected wetland identified roughly 1.5km from the nearest turbine. Siting avoided direct overlap by positioning the turbine array on higher ground away from the wetland buffer zone, and this distance was set based on recommendations from the pre-construction ecological survey.

Q6 Describe the measures in place to manage waste streams during operation across all three facilities, including used lubricants, hydraulic fluids, worn components, and any other operational waste. Are used materials recovered, recycled or sent for energy recovery, or are they disposed to landfill?

A6 On operational waste: used lubricants and hydraulic fluids are collected and sent to licensed contractors for treatment and recovery, not landfill. Worn components like gearbox parts or blade sections are assessed for repair/refurbishment first where feasible, and metal components are recycled given scrap value. Composite blade material, where replaced, is the harder fraction, currently mostly going to energy recovery or specialist disposal, as commercially available blade-recycling routes are still limited. This is a minor volume given the fleet is relatively young.

Q7 Has an assessment of supply chain sourcing practices been carried out for turbine procurement (including blade, nacelle, tower and foundation materials and components)? If yes, what were the main findings on material sourcing and end-of-life responsibility?

A7 On supply chain sourcing: yes, an assessment was carried out for turbine procurement covering blade, nacelle, tower and foundation components. Main findings were that steel and tower materials have well-established recycled content and traceability through major suppliers, blade material sourcing (composites) is less transparent on end-of-life responsibility, which is a known industry-wide gap, and foundation concrete sourcing was assessed for standard responsible sourcing but without specific end-of-life recovery commitments. Overall the assessment confirmed reasonable sourcing practice with blade end-of-life being the clearest remaining gap.

Q8 Are there any protected species (birds, bats, or other fauna) for which ongoing monitoring or impact data collection is undertaken during operation at any of the three sites beyond the curtailment protocols already described?

A8 Yes, Wind Three has ongoing monitoring beyond the curtailment protocols, given its proximity to the wetland area. This includes periodic bird and bat activity surveys and carcass search monitoring around the turbine array, carried out on a seasonal basis to track any impact on the local population and inform whether curtailment timings need adjusting. Wind One and Wind Two don't have dedicated ongoing monitoring programmes beyond the curtailment protocols, as the pre-construction surveys didn't identify sensitive species activity warranting that level of follow-up.

No documents were provided during this assessment; the record above is the complete evidence basis.