2025 Impact Report



NORWICH TECHNOLOGIES

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Welcome

We are pleased to present the Norwich Technologies Second Annual Impact Report.

2025 was a tumultuous year for the solar industry, but our company finished strong. We've been through challenging markets before, and we have the experience, flexibility, and determination to weather storms like these while continuing to move forward.

Now, more than ever, we recognize the importance of understanding and measuring our impact across the key areas of our business. This work helps us make sure we're delivering the greatest possible positive impact through both what we do and how we operate. It isn't just about sustainability—it's about building a stronger, more resilient company.

Getting a fuller picture of our operations helps us identify where we're doing well, where we have room to improve, and where we need to adapt. It allows us to make better decisions and continually improve not only **what** we do, but **how** we do it.

In this report, we share an overview of our operations, progress, changes, and success stories from 2025. This year also marks Norwich Technologies' B Corp re-certification, and this report builds on the measurements and commitments outlined in our first Impact Report while incorporating new areas of measurement aligned with the B Lab Standards 2.0.

We are proud of the progress we've made, while recognizing that there is always more work to do. We look forward to continuing to learn, improve, and contribute to a bright future powered by renewable energy.

Best regards,

Jim Merriam

Jim Merriam - CEO, Norwich Technologies





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1

Highlights

An overview of our 2025 operations and projects

About Us

We are a Family of Companies.

As a vertically integrated company, Norwich Technologies can manage all aspects of renewable energy projects, from development and permitting, to engineering, procurement, and construction, through ongoing operation and maintenance.

NORWICH TECHNOLOGIES	Breakaway Renewables	NORWICH SOLAR	RunTime Solar	NORWICH EV
Parent Company, R&D, Investment, Asset Ownership	Development & Finance	Engineering, Procurement & Construction	Operations & Maintenance	Vehicle Charging

Current Snapshot:

2011	43	95+ MW DC	340+	50
Date of Incorporation	Full-Time Employees	Total solar energy built since inception	Completed projects since inception	Installed EV charging projects

We’re on a Mission to Deliver More Clean Energy to New England and Beyond

Norwich Technologies develops and builds new renewable energy projects that directly benefit towns, businesses, affordable housing providers, and nonprofits, improving the triple-bottom-line of our stakeholders.

Throughout the company’s existence, we have maintained a relatively flat organization with open internal communications and dialog. This has resulted in the fluid and informal improvements to the way we operate that drive our success. These organic changes have led us to transition from residential solar, to commercial, and on to community and utility-scale projects beyond our home state of Vermont.

Mission

To rapidly advance the integration and deployment of affordable clean energy and technology solutions to help our stakeholders move towards energy independence.

Vision

An equitable and sustainable transformation of the region's energy systems that benefits people and the planet while supporting the local economy.

Our Values

Support Local Communities	In our process, we prioritize the local communities we work in. We aim to source at least 50% of all project expenses from local and independent suppliers and contractors. We work closely with local farms and businesses to help lower their energy costs, or to enable them to create new revenue streams by leasing space to host solar facilities. Our projects support the local community with annual tax contributions.
Environmental and Economic Sustainability	We make environmental sustainability and economic development an integral component of our business; striving to reduce greenhouse gas emissions and minimize solid waste throughout all aspects of our business practice as we strengthen the economy by keeping our hiring and community's energy dollars local.
Quality Assurance	We incorporate customer priorities throughout every process, providing avenues to listen to and address customer concerns, and working diligently to guarantee customer satisfaction.
Equal Opportunity Employer	We are an equal opportunity employer with a strong commitment to diversity and inclusion. We prohibit discrimination based on race, color, religion, sex, age, national origin, sexual orientation, gender identity or expression, disability, veteran status, marital status, or any other legally protected status.
Sustainable Company Growth	As a private, for-profit company we work to consistently maintain a strong financial foundation to more effectively promote our mission and values.

2025 Highlights

2025 was a whirlwind of changes at the federal level. The celebrated Inflation Reduction Act (IRA) was repealed. Then came the devastating blow of the the OBBBA. The solar industry has had to quickly adapt to a post IRA market.

New challenges arose following President Trump's "Liberation Day" tariff announcements in April 2025 and the passage of the One Big Beautiful Bill Act (OBBBA). The most concerning of which is the abrupt end to the Investment Tax Credit and revised FEOC rules, combined with delays & uncertainty surrounding REAP grants and the end of the Solar for All program. The additional changes to state Net Metering programs, and long interconnection queues made 2025 a memorable year. That's not to mention the delays and cancellations of the Federal NEVI charging program.

Norwich Solar has experienced challenges like these in the past and quickly rallied our expert team together to develop Safe Harbor strategies and explore new finance structures.

The final push of December saw our Breakaway development and finance team create EPC's and MIPA's, to meet 6 year-end closes and a total of 14 projects were safe harbored, not to mention domestic content criteria met and many other year end deadlines. The Norwich Solar EPC team completed 13 solar projects – adding almost 16 MW DC of new solar power to the region – and just for good measure we installed 20+ new Level 3 EV chargers to meet end-of-year deadlines.

Despite the challenges NT had its Most Profitable year ever! Our revenues increased and with careful management of our operational costs we're proving our intrepid model for success.

Staffing Changes

We continue grow in scale of our projects and scope of our operations. Since the last report and the time of this publication, we've added 11 new team members, and said farewell to 6 team members.

Promotions and Changes



Luke Cady was promoted from Vice President Business Operations to COO/CIO



Robert Boylan was promoted from Director of Project Manager to VP of Construction



Martha Staskus stepped down as Chief Development Officer, but continues to support our work through her company VERA Renewables.

New Team Members



Alton Bell
Solar System Engineer



Austin Brose
EPC Internal Project Manager



Corinne Brochu
Paralegal



Derek Turnbull
EPC Project Manager



Eric Phaneuf
Corporate Council



Henry Pentland
Solar Engineer



Jennifer Walker
Business Analyst



Jeremy Goldman
EPC Project Manager



Joe Murphy
Field Technician



Paul Laferrie
Lead Electrician

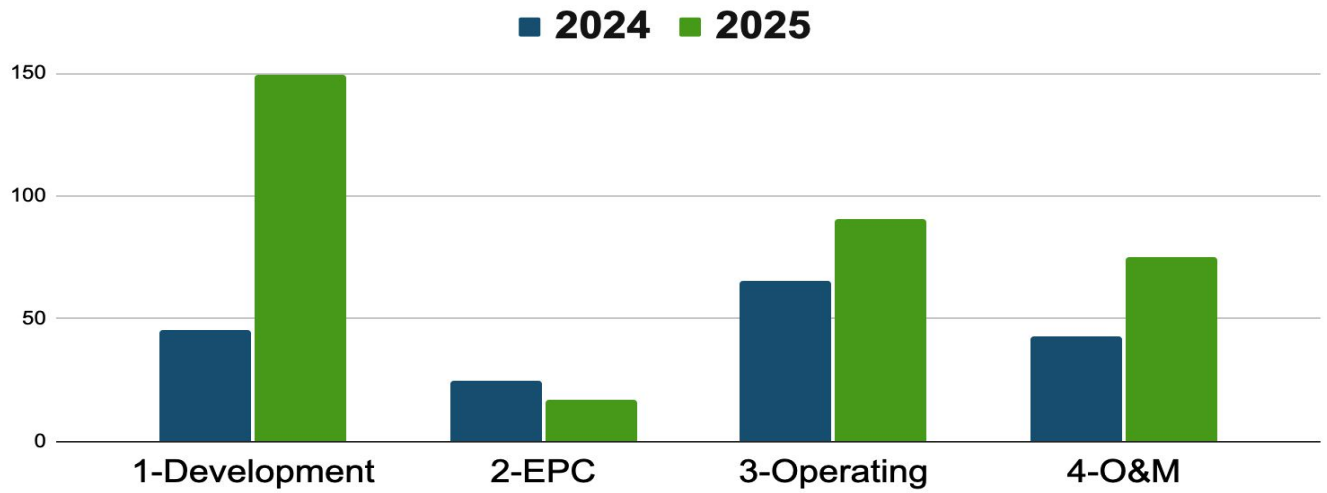


Rachael Chicoine
Solar Development Project Manager

Solar Projects

A current snapshot of pipeline of solar PV projects as it flows through Development, to EPC, to Operating. The EPC work we do is a combination of internally developed projects and direct bid projects.

Shown in
MW DC



Of Projects

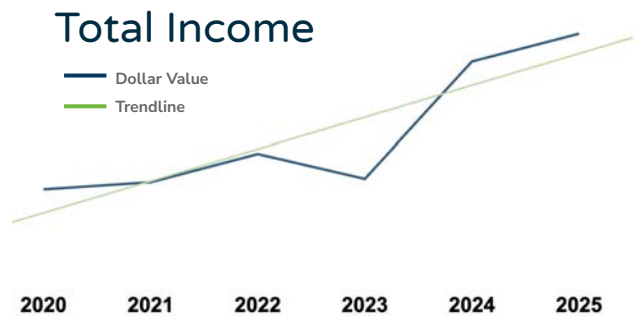
	Development	EPC	Operating	O&M
2024	28	15	329	96
2025	27	13	342	111

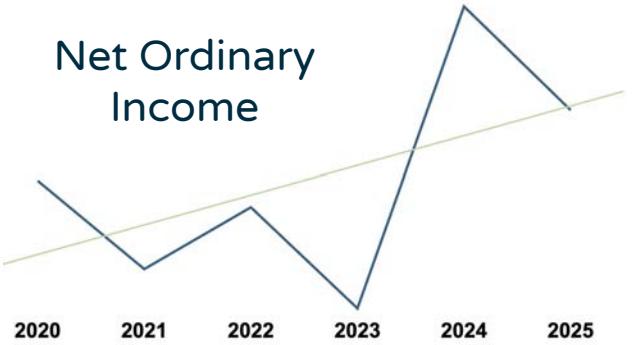
Financial Resilience & Sustainable Growth

A durable business built for the long term.

Norwich Technologies has grown steadily by focusing on disciplined project development, high-quality EPC execution, and long-term relationships with customers and partners. Our approach to growth emphasizes sustainable expansion rather than growth for its own sake. Our continued success is driven by practical expertise, collaboration, and innovation.

Solar projects are long-lived infrastructure investments, and our customers depend on Norwich Solar to be there throughout development, construction, commissioning, and ongoing support. We maintain disciplined financial and operational practices designed to support steady growth, manage project and market risk, and maintain the resources necessary to meet our commitments.





Solar Project Highlights



PORTFOLIO DEVELOPMENTS

1. **VT 500s**
   The EPC team energized five Vermont sites!

2. **Readfield Main Street, ME**
   Mobilized in January, achieved Mechanical Completion in June, and received Permission to Operate in August.

3. **Warner Poverty Plains, NH**
   Mobilization began for this project, which is our largest to date at nearly 5 MW-AC.

4. **Rumford Cedar, ME**
   Closed with buyer in June, the EPC advanced the project from development stage to final completion.

5. **Rockingham, VT**
   Acquired a developed project, completed in September 2025.

EV Charging Highlights

To date, Norwich EV is the only company to have installed high speed chargers in Vermont under the NEVI program.



INFRASTRUCTURE DEPLOYMENT

1. **Randolph Summer Street (NEVI)**

   This key project faced short deadlines but was successfully energized in December, setting a strong precedent for NEVI execution.

2. **Pilgrim Park in Waterbury**

   Successfully commissioned commercial chargers after complex, close coordination of transformer swaps and site access.

3. **Woodstock Woolen Mill**

   Completed Level 3 EV installations, significantly expanding regional high-speed charging capability.

RunTime Highlights



OPERATIONS & MAINTENANCE

1. **Benz Solar Service (Ansonia, CT)**

   The RunTime team completed its first round of service work for a client, ensuring peak operational performance.

2. **Communications Upgrades**

   Upgraded inverter communications and provided thorough annual technical inspections to secure system reliability.

3. **Burlington Rooftop Rebuild (Battery St)**

   Delivered and finalized a complete commercial rooftop rebuild, optimizing energy yield for the tennant.

Affiliated Companies

Between 2024 and 2025, Norwich Technologies and the Greenway Institute collaboratively purchased six buildings at the former Vermont College of Fine Arts campus in Montpelier to ensure continued community benefit. The Greenway Campus now hosts various small businesses and nonprofits, offers commercial spaces, and provides medium-term housing rentals in the repurposed Dewey Hall. The Greenway Institute plans to launch its first class in 2027.



Appointed CEO in 2026, Paul Lesure is leading Durion through seed funding and initial commercial deployment. This coincides with a U.S. Department of Energy-funded project to deploy the HeatTrap™ thermal energy storage system for 24/7 clean heat in a Vermont pilot program and to design the full-scale SunTrap™ 24/7 clean power platform. Both technologies were developed via a U.S. DOE SBIR program by Norwich Technologies, drawing on over a decade of clean energy experience.





2

Report Card

Our achievements between the last report and now

Impact Review

Beginning last year with our first Annual Impact Report, we now follow specific and measurable guidance for continuous improvement of our operations throughout our value chain to increase the net positive impact of our work both upstream and downstream.

To track progress we created a Report Card system. The following pages list the tasks, measurements or practices we set for in the previous year, as well as new one.

Check the key to the right for description and status symbols in the report card. You'll notice the rows highlighted in green are new additions for this report!

Look for these symbols:

Task	Specific things we're doing or plan to do to reach our goals.
Measurement	Ongoing measurements and tracking of our impact metrics.
Practice	Topics that are or will be incorporated in our operations.

Done	Completed task or incorporated practice.
Doing	Work in progress or planned.
Not Done	Did not complete as planned.

Report Card

Category	Topic	Date Issued	Type	Status
Governance	Track 1% of revenue for donations & sponsorships	2024		
Social	Track annual reportable safety incidents and rating	2024		
Environmental	Calculate CO2 offsets of our projects	2024		
Governance	Track annual Underwriting, Donations and Sponsorships	2024		
Governance	Review grants and amounts received	2024		
Governance	Explore other strategic partnerships	2024		
Governance	Financial Transparency with Staff at our monthly meetings	2024		
Governance	Incorporate ESG topics into our company-wide meetings	2024		
Social	Review & update job descriptions to include sustainability responsibilities	2024		
Social	Review and Update Worker Benefits	2024		
Governance	Engage in collective actions to advance social or environmental impact	2025		
Governance	Conduct external research to advance social or environmental impacts	2025		
Governance	Engage in thought leadership	2025		
Environmental	Promote public policy to advance social or environmental impacts	2025		
Social	Create a safety team	2024		
Social	Conduct Stakeholder evaluation	2024		
Governance	Update Charitable Giving Guidance	2024		
Social	Update Diversity and Inclusion Statement	2024		
Governance	Update Mission, Vision and Values Statements	2024		
Governance	Update the privacy policy, using the latest GDPR standards	2024		
Governance	Create AI use Policy	2025		
Environmental	Create a Climate Action Plan	2025		
Governance	Create Grievance Policy and procedures	2025		
Governance	Create Marketing and PR Policy	2025		
Social	Develop stakeholder engagement plan	2025		
Governance	Update Materiality Assessments	2025		

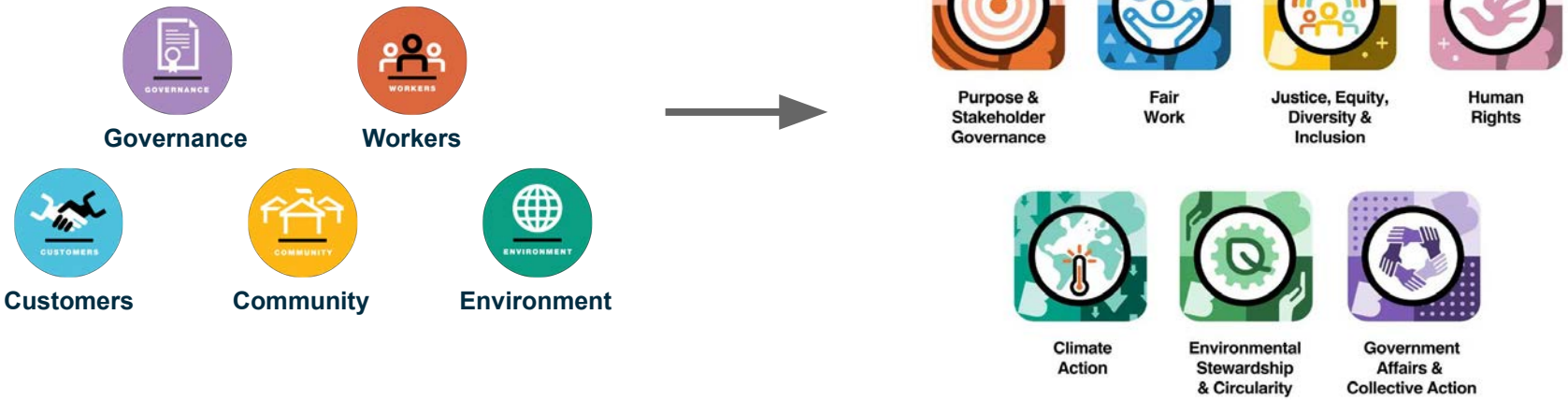
Report Card, Continued

Category	Topic	Date Issued	Type	Status
Environmental	Track electricity use	2024		
Environmental	Track Emissions from our Fleet vehicles	2024		
Social	Track employee satisfaction	2024		
Environmental	Track Hazardous waste	2024		
Environmental	Track Recycling	2024		
Environmental	Track water use	2024		
Social	Track staff engagement with JEDIB topics	2024		
Environmental	Calculate Scope 1, 2 & 3 GHG Emission	2024		
Environmental	Create a Climate Transition Plan for 1.5°C ‘net zero target by 2050’	2024		
Governance	Create Annual Public Impact Report	2024		
Governance	Develop a Climate Resilience Plan	2024		
Governance	Create Human rights policy	2025		
Governance	Update procurement policy that considers environmental impacts & human rights	2025		
Governance	Create Lobbying and Advocacy policy	2025		
Social	Create safety training plans and execute workshops	2024		
Social	Complete DEI evaluation	2024		
Social	Create a Community Engagement and Volunteering plan	2024		
Social	Develop a series of JEDIB centered discussions or workshops	2024		

Transitioning to the New B Corp Standards

Our previous Impact Report followed the structure of the previous B Lab criteria with five topics, and a points system. The updated requirements for certification have been expanded to seven topics and is now a pass/fail scoring. Our deadline for recertification is in April 2026!

The remainder of this Report will be organized in their overarching ESG sections while highlighting the relevant B Lab topics.



Meet the B Team



Diana Wood

Director of Communications & Sustainability

Team Lead



Suzanne Jones

Office Manager

Internal stakeholders, workplace culture



Luke Cady

CIO/COO

Internalizing processes, Governance



Kristin DeDiana

Director of Breakaway Operations

Dev/Finance Connection



Kevin Davis

VP Sales

External stakeholders, Vendor relations



Michael Duplessis

IT Manager

Data integration



Jennifer Walker

Business Analyst

Direct Services Connection



3

Our Impact

A look back on some of our recent achievements.

Environmental

Renewable energy, sustainability and mitigating climate change is at the core of everything we do. Our solar projects bring a myriad of benefits including reduction in carbon from fossil fuel power generation, turning brownfields into energy generating solar sites, and helping landowners retain their land into the future.

Because we typically build and sell our solar projects to 3rd parties, we cannot claim the benefits of those projects in perpetuity. Therefore, we also need to make incremental improvements to the impact of our daily operations.

This includes setting goals like striving to achieve Net Zero operations, reducing carbon emissions from our fleet vehicles, reducing our use of heating fuel use and everything in between.



Annual Energy Production & Carbon Offsets from Solar Projects

Since our inception in 2011, Norwich Technologies (Norwich Solar & Norwich EV) has completed over 340 projects, including: residential, commercial, community and distributed generation solar projects as well as EV chargers. In total, we've added over 95 MW DC of renewable solar energy to the grid. Solar panels are expected to keep producing electricity for more than 25 years with only minimal reductions in productivity over the course of their operation, so their benefits are long-lived. **Below is the expected impact of our work for each year our projects operate.**



Generating
109,925,723 kWh
of clean solar power



enough energy to power
15,000 homes



offsetting
77,900 metric tons
of CO_2



that's like parking
16,800 cars each year



or equivalent of
sequestration capacity of
92,000 acres of forest

NOTE: calculations are based on estimated annual kWh production of the solar arrays and EPA offset estimates.

Impact of Our Operations & Facilities

For the first time, we have gathered information about the environmental impacts of our operations. The scope includes our project sites, leased office spaces, and the four commercial buildings we own. The dollar costs of these figures are relatively small when compared to the costs of our solar projects, but the impact of our own energy and water use, as well as the waste and recycling we create, has direct effect on the planet and people.

Using 2025 as our base year, this data will be monitored annually and used to inform our Climate Action Plan. Through the discovery process we noted that much of our office waste and recycling is included in our lease agreements. With the purchase of four buildings in Montpelier we now have a notable fuel consumption. Some of the energy use was estimated using secondary intensity factors from the US Energy Information Administration (EIA) Commercial Buildings Energy Consumption Surveys (CBECS). The renewable energy we consumed came from owned solar panels and a PPA with a hydro power plant. Also note that our food scraps get composted and waste cooking oil gets turned into biodiesel. Below are overall totals. More details by location are in the Appendix.



809,000

Gallons of Water Used



65,018

Gallons of Heating Oil Used



9,714

Pounds of Solar Panels Recycled



70.88

Tons of Construction Waste to Landfill



615,295

kWh of Energy Used from the Grid



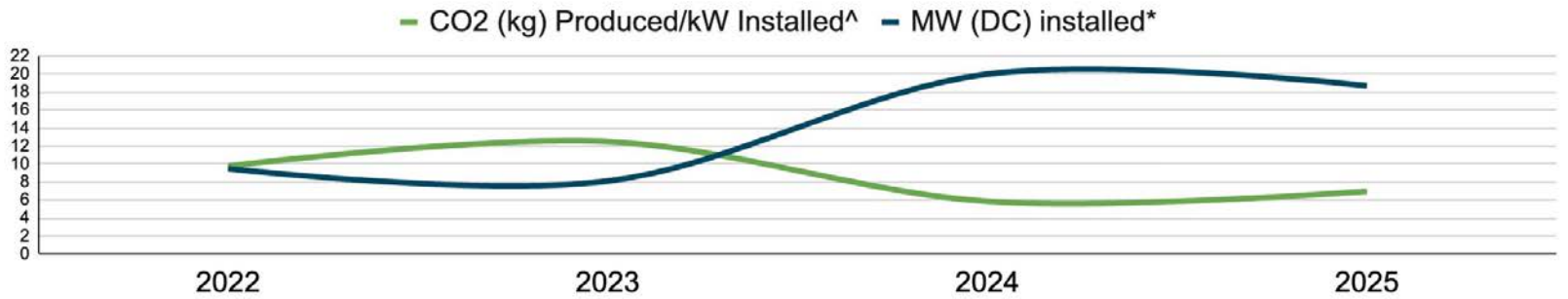
356,183

kWh of Renewable Energy Consumed

Fleet Vehicles

In 2025, as our company grew, we added two more fleet vehicle, and the number of projects and distances from our bases of operations increased. This year our staff drove just over 60,000 more miles and used about 1,600 more gallons of gasoline. With the additions of hybrid vehicles in 2024 and 2025, our fleet efficiency (in miles/gallon) has improved from 19 MPG to 23 MPG since 2022 despite almost doubling the miles driven. **In 2025, our net environmental impact of CO_2 emissions per kW installed has increased.**

Vehicle Type	Owned	Average Cost/Mile	Average Miles Per Gallon	2025 Miles Driven	2025 Gallons Used	2025 kg CO_2✦
EV	3	$0.63	N/A	32,000 (est)	0	0
Hybrid	9	$0.42	44	148,082	3,350	29,815
Gas Truck	7	$0.72	14	161,003	11,296	100,535



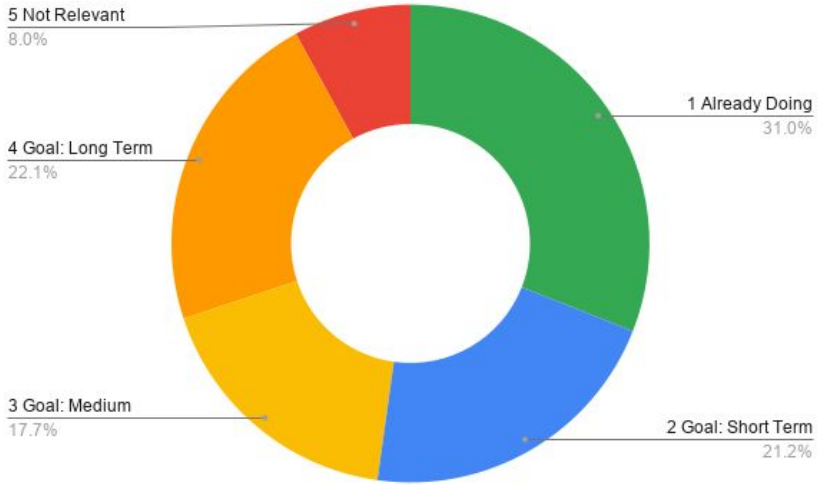
✦tailpipe emissions in 2025 ^CO_2 is emissions are based on EPA estimates *projects that reached mechanical or substantial completion within that year

Climate Action Plan

Norwich Technologies has developed a Climate Action Plan to establish a practical, long-term framework for reducing greenhouse gas emissions, strengthening climate resilience, and supporting the global ambition of limiting warming to 1.5°C. The plan was developed using the SME Climate Hub online tool. Of the 113 suggested activities in the plan, Norwich Technologies is already implementing 36 of them (~30%)

An initial greenhouse gas inventory and emissions scoping exercise was completed, and the CAP is also complemented by a separate Climate Resilience Plan addressing the physical risks that climate change presents to the company's operations.

The Climate Action Plan is designed as a phased roadmap. It establishes actions that can be implemented now while creating a foundation for more detailed emissions measurement, target-setting, and continuous improvement as the company builds its climate data and management systems.

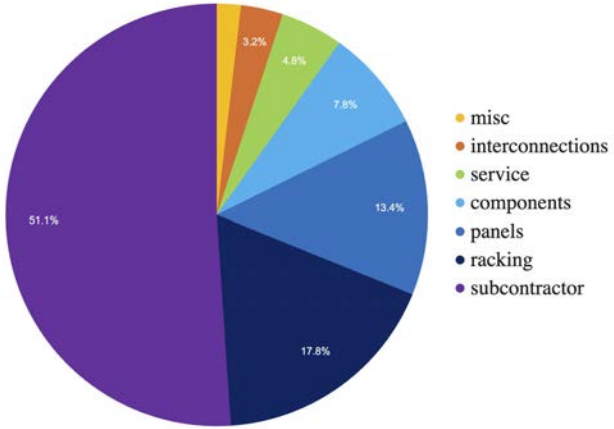


Additional Documents are in the Appendix:

- **Climate Action Details**
- **GHG Inventory & Scoping**
- **Climate Resilience Analysis**

Supply Chain

In order to consider the actual and potential environmental impacts in our procurement decisions, we analyzed our top 20 vendors (spend-based) to ensure our purchasing choices reflect our commitment to environmental stewardship. In 2025, our top material procurement items were racks, panels, and electrical components. Approximately 50% of our annual project expenses were for local subcontractors (labor) and construction services. The remaining percents cover other services and fees. **As part of our procurement policy, we use local and regional vendors wherever possible.**



Material Purchases	Percent	Impact
Solar Racking, Mounts & Tracking Systems	18%	Steel and aluminum are a necessary component of structural racking systems. Our top suppliers design these components with less steel and aluminum, reducing the demand for virgin materials, and utilize recycled materials whenever possible.
Photovoltaic Solar Modules & Bifacial Panels	13%	Solar panels are largest material procurement cost for our EPC projects. We often utilize panels manufactured in the US which reduces our procurement emissions. Our top suppliers prioritize recycled materials and recycle panels at the end of their useful life.
Inverters & Balance of System Electricals	7%	Utility-scale inverters, transformers, switchgear, meters, and high-voltage cabling make up a large part of our materials. Our suppliers prioritize domestically manufactured and recycled materials that maximize performance to extend product lifespan.

Supply Chain Evaluations

Across our supply chain, we monitor performance and service quality, environmental, and ethical alignment. These evaluations are designed to support objective, data-driven procurement decisions. A more detailed analysis can be found in the appendix.

2025 Vendor Evaluations - Environmental & Human Rights Impacts										
Vendor ID	Environmental Performance Evaluation	Verified Environmental Goals	Environmental Progress Metrics	Published ESG Report	Published EcoVadis Score	Supplier Code of Conduct	Human Rights Commitments	Fair Labor Commitments	Alignment with UDHR & ILO	Requires Violation Reports
VEN-339										
VEN-1120										
VEN-575	✓	✓	✓	✓	Silver	✓	✓	✓	✓	✓
VEN-1259										
VEN-1090										
VEN-143	✓			✓		✓	✓	✓	✓	
VEN-805	✓	✓	✓	✓		✓	✓	✓	✓	
VEN-603	✓	✓	✓	✓		✓	✓	✓	✓	✓
VEN-388										
VEN-1289	✓	✓	✓							
VEN-132										
VEN-116	✓	✓	✓	✓	Gold	✓	✓	✓	✓	✓
VEN-1242						✓	✓	✓	✓	✓
VEN-1141	✓	✓	✓	✓	Platinum	✓	✓	✓	✓	✓
VEN-309, 312, 321, 671, 676, 826	✓	✓	✓							
VEN-1445 & VEN-1492										
VEN-194										
VEN-1151										
VEN-206	✓	✓	✓	✓		✓	✓	✓	✓	✓
VEN-1377										

Social

Our success has always been driven by the dedication of our staff and the strength of our collaborations with external organizations. For a company of our scale, these partnerships are essential.

We take a holistic stakeholder approach that accounts for the impacts of our operations on workers, customers, vendors, suppliers, and strategic partners. This broader perspective centers on social sustainability, prioritizing ethical management across our entire ecosystem.

We are committed to fostering positive relationships with our staff, customers, suppliers, and the wider community by upholding rigorous standards in:

- Labor Practices: Ensuring fair employment and equal opportunities.
- Human Rights: Demonstrating respect and ethical conduct in all interactions.
- Justice, Equity, Diversity, Inclusion and Belonging: Ensuring our workplace is inclusive, and the work we do benefits all members of the community.
- Ethics and Transparency: Holding high standards for communications with our stakeholders.
- Community Engagement: Actively participating in and supporting the communities we serve.

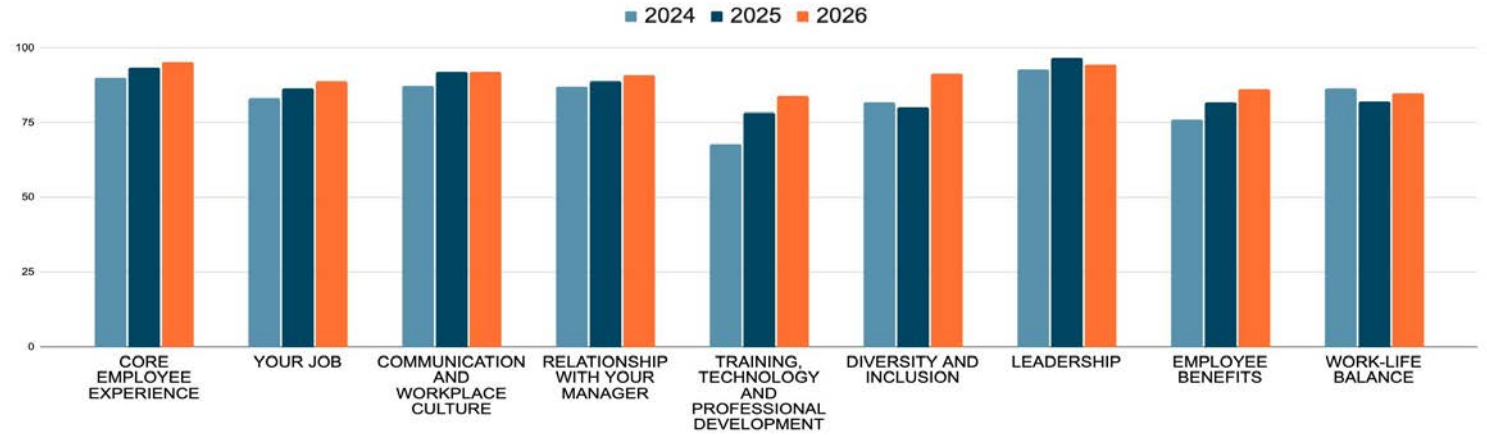


Best Place To Work

The Overall Survey “Agree” score is 90%. An improvement over the last three years (87% and 83%). In almost all categories we scored higher than in previous years.

The Company was voted by its employees in 2021, 2022, 2025 and again in 2026 as one of the Best Places to Work in Vermont! The awards program was created in 2006 and is presented in partnership with the Society for Human Resource Management, Vermont State Council, VTSHRM, the Vermont Department of Commerce and Community Development and Workforce Research Group. The in-depth survey covers a wide range of topics about employee satisfaction. We rely on these anonymous surveys to gather input, and we act on it – implementing several changes.





Worker Safety

Construction and electrical work poses many hazards for workers. NT is dedicated to keeping all of our workers safe on the job. We created a Safety Team with members from across the company divisions. In 2024, we made it policy that anybody who goes onto one of our construction sites, or may go onto one of our construction sites, should have at least OSHA 10 Construction Safety Training.

Safety Team
Harold Craig is our Safety Team Lead. He holds several EHS Certificates including: OSHA 10, OSHA 30, Arch flash, NFPA, CPR, Forklift, Master Plumber, and more. Nine staff members (including all of our project managers and field technicians) have at least OSHA 10 level training, eight employees have OSHA 30 certification, nine staff members have CPR/AED certification, and seven hold certifications for skid steers & fork lifts.

We also have following programs in place:

- Written safety program
- Monthly safety meetings
- Quarterly safety inspection audits
- All of our field personnel are trained in First Aid and CPR
- NO civil or criminal violations as a company within the past 3 years



	2022	2023	2024	2025
EMR Safety Rating	0.87	0.85	0.85	0.89
Reportable Incidents	2	0	1	1

Human Rights



Norwich Technologies is committed to respecting and promoting internationally recognized human rights throughout our operations and value chain. We recognize that businesses have a responsibility to respect human rights and to avoid causing or contributing to adverse human rights impacts.

We are committed to conducting our business in a manner that respects the dignity, equality, safety, and fundamental rights of all people affected by our activities. Our commitment is guided by internationally recognized human rights standards, including:

- The Universal Declaration of Human Rights (UDHR);
- The International Covenant on Civil and Political Rights (ICCPR);
- The International Covenant on Economic, Social and Cultural Rights (ICESCR), together comprising the International Bill of Human Rights;
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the fundamental principles and rights reflected therein; and
- The United Nations Guiding Principles on Business and Human Rights (UNGPs).

We recognize that respect for human rights is a fundamental part of responsible business conduct, and is an important consideration throughout the company's entire value chain. As such we are including human rights impacts into our procurement process and vendor evaluations.

To support this commitment, we have adopted a Human Rights Policy and posted it on our website, and we have signed the SEIA Forced Labor Prevention Pledge! https://seia.org/solar-industry-forced-labor-prevention-pledge.

JEDIB

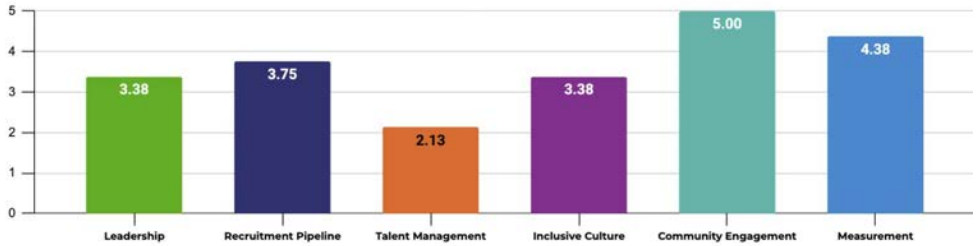


Norwich Technologies is dedicated to creating an inclusive and supportive work environment. Previously the company has updated its JEDIB (Justice, Equity, Diversity, Inclusion and Belonging) Statement, and in 2026 created our first JEDIB Action Plan (See appendix for details).

A diverse group of employees recently completed a DEI self assessment to offer further guidance for the JEDIB Action Plan. The assessment has six "levers of change" that evaluate the company's programs, policies, and priorities relate to diversity, equity, and inclusion (DEI).

DEI Self-Assessment: SUMMARY

Framework Levers	Growth Stage	Average Score
Leadership	Implementing	3.38
Recruitment Pipeline	Implementing	3.75
Talent Management	Developing	2.13
Inclusive Culture	Implementing	3.38
Community Engagement	Transforming	5.00
Measurement	Operationalizing	4.38



To support these commitments, we have adopted a detailed Non-Discrimination Policy and JEDIB Statement, which is made public on our website.

Driving Sustainable Innovation

Innovation is at the heart of what Norwich Technologies. Our R&D team developed a novel vertical panel system that can be commercialized and installed efficiently and quickly.

This multi-year collaboration with Norwich University, started in 2024 with a mechanical engineering capstone project mentored by Professor Illari Vihinen. In summer of 2026 a 6-kW, 12-panel vertical bifacial solar system was fully installed in Vermont. Norwich University Construction management students, handled the installation under Professor Mark Atwood, in partnership with Troy McBride and Leif Johnson of Norwich Technologies.

Three rows will be installed at the UVM Horticultural Research Center, as another phase of this project, to assess vegetable cultivation around the array to show how a vertical agrivoltaic system can maximize co-location of sustainable agricultural production of high-value crops and renewable electricity.



Left to right: John & Laura Hamilton (landowners), Leif Johnson, Illari Vihinen

Civic Engagement

Vermont's business & nonprofit community has a critical role to play supporting democracy. Employees expect stability, connection, and belonging from their workplaces, and a healthy democracy has a direct connection to workforce wellbeing, economic resilience, and long-term civic trust.

In 2026 the Vermont Secretary of State's Office created the Civic Connect program, and Norwich Technologies signed on as a Champion Member. As members of the program we share trusted and reliable information about voting with our staff members for Vermont, and the states where they live as well! We encourage our employees to vote and participate in their local communities.







Community Support & Philanthropy

Outside of the direct work we do, our company has the power to bring additional support to our community through direct donations, sponsorships and underwriting for many non-profit organizations and advocacy for clean energy policies in the states where we operate.

We get many requests for support each month, and have created guidelines to help us decide how to direct our dollars. We have set a goal of allocating 1% of our annual revenues towards this effort.



Percent of Annual Revenue Spent on Donations, Sponsorships, Memberships & Underwriting

2023	2024	2025
1.13%	0.94%	0.91%

Supporting Community at the Greenway Campus in Montpelier

Norwich Technologies owns 4 buildings that are part of the collaborative Greenway Campus.

Schulmaier, Martha Science, and College Halls offer a mix of office and commercial spaces, and event spaces. They are home to tenants such as ORCA Public Media, Vermont Arts Council, Home Share Vermont, Vermont Woodlands Association, Pacem School, Contemporary Dance & Fitness and MANY MORE.

Dewey Hall was a former dormitory that has been converted to medium-term housing rentals with 80 private, furnished bedrooms and common spaces. This building has provided workforce housing for a local cheesemaker, as well as state representative when the Legislature is in session. In 2025, Dewey Hall housed 105 guests.



Governance

Governance encompasses the evaluation of a company's leadership, processes, internal controls, and human rights, alongside its interactions with external stakeholders. Key areas of focus include organizational structure, employee benefits, customer satisfaction, supply chain resilience, business ethics, and overall transparency.

We are continuously enhancing our positive impact by formalizing internal procedures and policies, ensuring that social and environmental performance is integrated into all decision-making processes. To support this commitment, we have updated several key policies within our Employee Handbook, with relevant documentation now publicly accessible on our website. As a company we welcome employee feedback and transparent communication. We cover ESG topics during our monthly all staff meeting including financial updates.



Materiality Assessment

The material assessment and double material assessments (DMA) are strategic frameworks that help us understand the sustainability issues that affect our stakeholders and financial performance. We completed several evaluations using SASB, ESRS and stakeholder frameworks to explore how our operations impact the environment and society, and then prioritized the most significant ones so NT's business strategies, corporate governance processes, and practices can be aligned accordingly to increase our positive impact and reduce costs. These assessments are key analytics that inform our Environmental Stewardship Plans and Procurement Policy.

Environmental

Climate Change & Energy
- Grid energy diversification & GHG mitigation
- Solar integration & operational efficiency
- High impact on decarbonization targets

Water & Ecological Impact
- Water efficiency & wastewater treatment
- Sensitive habitat protection & site permitting
- Responsible resource sourcing

Circular Economy & Waste
- Hazardous material & e-waste management
- Product end-of-life & recycling
- Scarce metal & mineral conservation

Social

Workers in the Value Chain
- Occupational health & safety standards
- Fair wages & working time regulations
- Elimination of forced & child labor upstream

Community & Infrastructure
- Impact on underserved communities & LMI
- Societal & local energy infrastructure boost
- Community engagement in project development

Workforce & Inclusion
- Internal staff engagement & retention
- Diversity, equity, and inclusion initiatives
- Customer service & consumer welfare

Governance

Supply Chain Integrity
- Critical materials sourcing transparency
- Mitigation of geopolitical & price volatility risks
- Responsible supplier selection

Ethics & Regulatory Compliance
- Policy engagement on grid regulation
- Anti-corruption, bribery, & business ethics
- Ethical communications & whistleblower protection

Systemic Risk & Resilience
- Materiality risk management
- Business continuity & technology risks
- Information transparency & data security

Stakeholder Communications & Engagement

For the past several years, NT has returned again and again to our evaluate our stakeholder engagement process. As company and market continues to evolve, this analysis ensures that we are upholding our values of transparent and ethical communications across all of our activities. Below is an overview of stakeholder groups and how we engage with them.

Stakeholder	Topics	Methods
Employees	Company performance and strategy; health & safety; benefits; wellbeing; career development and training; diversity, equity & inclusion; ethics and business conduct; social responsibility and impact; industry news; emergency preparedness; feedback, concerns and grievances	Meetings; company-wide communications; email; annual reviews; trainings & workshops; employee surveys; conferences; internal reporting/feedback channels
Landowners	Lease terms; project design and schedule; access; construction activities; land stewardship; environmental impacts; property impacts; operations and maintenance; decommissioning; community concerns	Meetings; site visits; phone calls; email; lease agreements; written notices; project updates; direct project contacts
Communities / Neighbors	Project design and siting; environmental and social impacts; construction schedule; traffic and road use; visual impacts and screening; noise; vegetation; local economic and community benefits; decommissioning; concerns and grievances	Public meetings; official notices; letters; direct outreach; site visits; project website; presentations; community meetings; public comment processes; project contact channels
AHJs / Municipalities	Permitting and approvals; zoning and land use; project design; code compliance; construction progress; inspections; health & safety; environmental compliance; traffic; reporting and documentation	Permitting submissions; meetings; hearings; official correspondence; site inspections; phone calls; email; contracts; project documentation
Regulators / Policymakers	Regulatory and legislative developments; permitting; environmental and societal impacts; energy and climate policy; compliance; industry standards; project-specific issues	Formal comments; public hearings; written testimony; meetings; letters; direct outreach; industry associations; regulatory proceedings
Project Partners & Offtakers	Project performance; schedules; contractual obligations; environmental and social impacts; health & safety; quality; risk management; energy production; commercial performance	Emails; meetings; phone calls; project-management meetings; reports; data sharing; contracts; presentations; site visits
Investors & Lenders	Financial performance and stability; project pipeline; project performance; risk management; regulatory environment; ESG/impact performance; governance; compliance; project due diligence	Meetings; emails; phone calls; reports; presentations; contracts; data rooms; due diligence materials; investor updates
Suppliers & Contractors	Project scope and schedule; company performance; quality; health & safety; environmental requirements; procurement; contractual/payment terms; supply-chain risks; ethical business practices; industry news	Emails; meetings; conferences; phone calls; RFPs; bids; contracts; trainings; project-management meetings; supplier reviews
Industry & Trade Organizations	Industry trends; policy and regulation; best practices; technical standards; workforce development; sustainability; market developments; industry advocacy	Conferences; working groups; committees; webinars; presentations; industry publications; newsletters; association meetings; public policy engagement
Nonprofits / Community Organizations	Environmental and social impacts; climate and energy goals; community benefits; local economic development; environmental stewardship; community priorities; collaborative initiatives	Meetings; presentations; public forums; email; partnerships; sponsorships; collaborative projects; workshops
Financial & Professional Advisors	Project performance; financial and contractual risk; legal matters; tax; insurance; compliance; environmental and social issues; due diligence; governance	Meetings; email; phone calls; reports; data rooms; contracts; due diligence materials; professional consultations
Media / General Public	Company news; project milestones; community benefits; environmental and social impacts; industry developments; company impact and sustainability; major announcements	Press releases; interviews; website; social media; public statements; annual/impact reports; community events

Policies and SOPs

As the company matures, NT has created standard policies and initiated a Process Documentation project. Policies have been updated and added to our Employee Handbook and some have been made public on our website. The objective is to work with key managers and “do-ers” throughout the organization to identify key processes to improve organizational resilience and consistency.

Policy	Effective Date	Availability
Travel Policy	9/24	Internal only
Tuition & Education Policy	11/24	Internal only
Corporate Purchasing Policy	11/24	Internal only
Privacy Policy	12/24	Public on Website
Non-Discrimination / JEDIB	12/24	Public on Website
Grievance Policy & Procedure	7/26	Internal only
AI Policy	7/26	Internal only
Marketing & Communication Policy	7/26	Public on Website
Lobbying & Advocacy Policy	9/26	Public on Website
Human Rights Policy	9/26	Public on Website

Standard Operating Procedures

The List of Processes includes (but is not limited to):

- Data Management and IT Setup
- Accident and Safety Procedures
- Financial & Accounting Operations
- Hiring Procedures
- Project Management and Lifecycle
- Procurement and Inventory
- Net Metering and Billing
- O&M Specs
- Permits and Compliance
- Continuous Improvement
- Corrective Actions & Violation Remediation



Advocacy and Public Policy

Norwich Technologies actively engages with organizations dedicated to advancing renewable energy, bolstering the local economy, and fostering socially responsible business practices. Many of these partners participate in advocacy and lobbying at both state and federal levels, where our employees occasionally offer expert testimony and assist in shaping policy language. We ensure these partnerships align with our Impact Business Model by driving positive social and environmental outcomes. Our key organizational partners include SEIA, REV, CENH, MREA, NYSEIA, and VBSR.

Furthermore, we support groups such as the Vermont Energy Action Network, Vital Communities, and the Hartford Chamber of Commerce, which help inform local policies for clean energy, community resilience, and economic strength. Through donations and sponsorships, we also back organizations engaged in lobbying, including Vermont Works for Women and the Northeast Organic Farming Association (NOFA).

As an experienced developer of solar and energy storage, Norwich Solar contributes practical and technical expertise to public policy and regulatory processes. Our engagement—ranging from Vermont Public Utility Commission proceedings to industry working groups—focuses on fostering reliable clean energy transitions, predictable regulatory frameworks, equitable access, and the advancement of broader climate objectives.



Suzanne Jones (far left) joined other business leaders at the VBSR day at the Vermont Statehouse

Thought Leadership

Norwich Technologies and its operating companies, including Norwich Solar, use the knowledge and expertise of their employees to educate the public, policymakers, industry peers, community organizations, students, and other stakeholders about renewable energy, energy policy, grid modernization, climate resilience, clean-energy development, and the role of business in creating positive social and environmental outcomes.

NT's thought leadership occurs through:

- conference presentations and panels
- public education programs
- industry publications and articles
- community energy networks
- policy and regulatory discussions
- business and sustainability organizations
- direct knowledge-sharing with other businesses and community leaders



Troy McBride presented information about vertical solar and agrivoltaics at the VECAN conference.



Jim Merriam (right) was on a panel at the Renewable Energy Vermont Conference



Diana Wood (left) joined other Vermont B Corps on a panel at a VBSR Conference



4

Appendix

All the little details, that matter.

Climate Action Plan

Key Takeaways

Active Progress & Scope Distribution

- Out of 113 total climate initiatives, 35 (31%) are already active ("Already Doing"), while 69 initiatives (61%) are planned across short, medium, and long-term horizons.
- Scope 3 (Supply Chain & Value Chain) represents the largest single focus area with 36 initiatives, followed by Governance with 23 initiatives and Scope 1 & 2 (Direct Operations) with 17 initiatives.

Low Financial Barrier to Entry

- 75 out of 113 initiatives (66%) require only a "Small" financial investment, offering low-hanging fruit for immediate execution.
- Medium investment accounts for 24 initiatives (21%), while capital-intensive "Large" investment initiatives make up only 14 initiatives (12%).

Departmental Ownership Focus

- Communications & Sustainability (Coms/Sustain) leads operational ownership with 38 initiatives (28 requiring small investment).
- Facilities (20 initiatives) and Operations (15 initiatives) drive the majority of capital infrastructure and physical asset transformations.

Climate Action Plan: Status Highlights

Already Doing
35 initiatives

- Join local business sustainability group
- Publicly share plans
- Advocate for net zero
- Join industry initiatives
- Quantify avoided emissions

+30 active initiatives

Short-Term
24 initiatives

- Lunch & learn sessions
- Build employee net zero awareness
- Celebrate active staff
- Extreme weather plans
- Leadership sign-off

+19 planned

Medium-Term
20 initiatives

- Climate training for employees
- Green Wall for ideas
- Engagement survey
- Opportunity business plans
- Launch Green Team

+15 planned

Long-Term
25 initiatives

- Manage AC refrigerants
- Green retrofits
- Empower Green Team
- Assess capability gaps
- Role-specific training

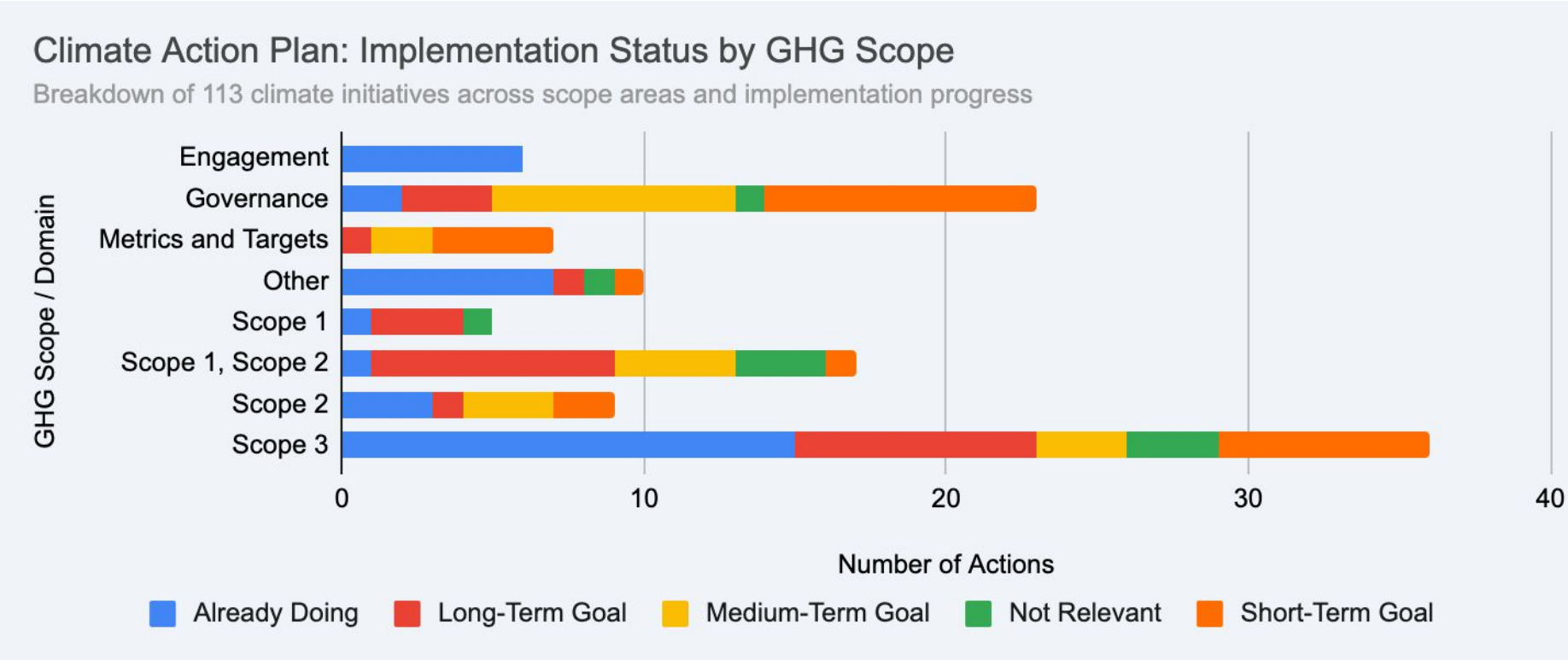
+20 planned

Deemed Not Relevant
9 initiatives

- Board level training
- Audience challenges
- Route software
- Optimise floor plan
- Electric HGVs

+4 others

Climate Action Plan: Implementation



GHG Inventory & Scoping

NT has has begun to map our GHG emissions. Like most companies the bulk of our impact comes from Scope 3 emissions in our value chain. We have not yet begun to track them, but the Climate Action Plan includes the goal of reducing our carbon emissions for all Scopes.

Scope 1
Direct Emissions

Mobile Combustion
Fleet Vehicles

Stationary Combustion
Heating in Montpelier Buildings

Scope 2
Indirect Emissions

Purchased Electricity
RRR, WTP, MTP

Scope 3
Value Chain

Purchased Goods
Operations, solar & EV projects

Capital Goods
Vehicles, buildings, software

Waste in Operations
Construction, office, wastewater

Leased Assets
RRR, WTP, Office ME, MTP buildings

Travel & Commuting
Business travel & employee commuting

Product Use
Owned solar & EV chargers

Climate Resilience Analysis

According to Climate Explorer, our region is predicted to experience warmer temperatures and increasing precipitation events interspersed with intense periods of drought. These conditions may affect the built environment, people, natural environment and the economy. The following analysis builds on the ongoing strategic shifts the company has been working on and lays the foundation for creating an actionable Climate Resilience Plan. By keeping climate risk top of mind, we can better integrate resilience into our decision making process.

Priority Assets	Hazards	Probability of Loss	Magnitude of Loss
land assets	**storms, flooding, erosion**	low	medium
active projects	**storms, blocked roadways, flooding, erosion, fires**	low	medium
operating projects (solar & EV)	**storms, blocked roadways, flooding, erosion, fires, wind**	medium	high
technology infrastructure	**Long term power outages, data center disruptions**	low	high
staff/human resources	**flooding, icing, fire, blizzards, extreme heat**	medium	high
supply chain	**hurricanes, tropical storms, fires**	medium	high
telecoms & utilities	**winter storms, wind storms, flooding**	high	high

Environmental Impacts

This table provides a detailed look at the waste generation, and fuel and energy use from our owned buildings and operations.



			2025	
Type	**Location**	**Notes**	**Net QTY**	**Units**
Water				
Water Use	ME	Included in rent	0	gal
Water Use	MTP (All)		809,000	gal
Water Use	RRR	Included in rent	0	gal
Water Use	WTP	Included in rent	0	gal
Net Water Use			809,000	gallons
Electric				
Electric Use	ME	CBECS estimated consumption	3,386	kWh
Electric Use	MTP (All)		544,922	kWh
Electric Use	RRR		9,937	kWh
Electric Use	WTP	CBECS estimated consumption	57,050	kWh
Solar generation	MTP (College, Dewey, Martha)		-289,120	kWh
Hydro generation	MTP (Martha)		-67,063	kWh
Net Energy Use			259,112	kWh
Oil & Gas				
Heating Fuel Use	ME	CBECS estimated consumption	4	gal
Heating Fuel Use	MTP (All)		64,768	gal
Heating Fuel Use	RRR	CBECS estimated consumption	31	gal
Heating Fuel Use	WTP	CBECS estimated consumption	215	gal
Net Heating Fuel Use			65,018	gallons
Waste				
Non-hazardous (landfill)	ME	Included in rent	0	lbs
Non-hazardous (landfill)	MTP (Dewey)	Flat fees charged for garbage	0	lbs
Non-hazardous (landfill)	MTP (College, Martha, Schulmaier)	Waste combined with the other association buildings	0	lbs
Non-hazardous (landfill)	RRR	Included in rent	0	lbs
Non-hazardous (landfill)	WTP	Flat fees charged for garbage	0	lbs
Total			0	lbs
Non-hazardous (recycling)	ME	Included in rent	0	lbs
Non-hazardous (recycling)	MTP (Dewey)	Flat fees for recycling	0	lbs
Non-hazardous (recycling)	MTP (College, Martha, Schulmaier)	Recycling is included with the other buildings in the Condo Assoc.	0	lbs
Non-hazardous (recycling)	RRR	Included in rent	0	lbs
Non-hazardous (recycling)	WTP	Flat fees for recycling	0	lbs
Total			0	lbs
Hazardous	All	No records of hazardous waste disposal from operations or projects	0	lbs
Total			0	lbs
Solar panel recycling	WTP		9,714	lbs
Total			9,714	lbs
Construction & demolition	ME project sites		68,820	lbs
Construction & demolition	VT project sites		72,940	lbs
Total			141,760	lbs
Compost	RRR	Food scraps not measured; composted by an employee at their home	0	lbs
Compost	MTP (Dewey & Schulmaier)	Vermont Compost does not weigh food scraps	0	lbs
Total			0	lbs
Cooking oils	MTP (Dewey)	Oil collected at no cost, no measured gallons	0	na
Total			0	na
Net Measured Waste			151,474	lbs

Supply Chain Analysis

Our top 20 spend-based vendors are evaluated to ensure our purchasing choices reflect our commitment to environmental stewardship, Human Rights, and Fair Work. This data analysis will be used to inform our Purchasing SOP, Vendor Qualifications and Supplier Code of Conduct.

Vendor ID	Virgin Material Reduction	Sustainable Sourcing	Procurement Footprint
VEN-339	Operations include silviculture virgin timber harvesting.	Certified Master Logger; recognizes logging that meets responsible forest management standards.	Certified Master Logger following regional forestry Best Management Practices (BMPs).
VEN-1120	Insufficient info; does not directly source raw virgin materials, but has no documentation of auditing suppliers on ESG metrics.	Insufficient info.	Insufficient info.
VEN-575	Panels designed with fewer silicones and virgin components.	Strict supplier mandates and standards for environmental performance, health and safety, human rights, and business ethics. Based on the Responsible Business Alliance (RBA) guidelines. Multi-tiered screening, third-party ESG audits, and chemical compliance frameworks	Raw materials sourced internationally. Has rigorous supplier ESG audits and standards.
VEN-1259	Insufficient info.	Insufficient info.	Insufficient info.
VEN-1090	Insufficient info.	Insufficient info.	Insufficient info.
VEN-143	Parent company reduces primary manufacturing resources with lower volumes of steel, concrete, and secondary components needed for utility-scale and commercial installations.	Domestic sourcing and manufacturing.	Domestic and vertically integrated supply chain.
VEN-805	Product design requires less raw steel and eliminates concrete.	Parent company supply chain prioritizes the procurement of recycled steel and recycled aluminum whenever possible to minimize the environmental footprint of heavy metal extraction. Material sourcing relies on domestic clean-tech steel providers, to implement lower-emission manufacturing options.	Reduced transportation emissions, all products are manufactured domestically.
VEN-603	Invests in durable and long-lasting infrastructure to minimize the life cycle consumption of raw materials.	Parent company requires its vendors to adhere to strict ESG standards, prioritizing suppliers that minimize waste and practice ethical manufacturing.	Only operates as a transmission and distribution utility.
VEN-388	Insufficient info.	Insufficient info.	Insufficient info.
VEN-1289	Replaces traditional virgin plastic or concrete protection layers with ballast pads made from recycled rubber.	Insufficient info.	Domestic steel sourcing.
VEN-132	Insufficient info.	Insufficient info.	Insufficient info.
VEN-116	Parent company redesigned products to minimize footprint and raw material consumption. Utilizes recycled/renewed materials in production. Recycles and regrinds plastics, recovers metals (iron and copper) generated during industrial processes, reintroduces them into production, offsetting the need for new virgin inputs.	Supplier management system for supply chain sustainability. Requirements for supplier onboarding, collaboration, evaluation, partnership, development, and exit, integrating ESG requirements into every stage drives long term responsible value. 2050 commitment to achieving a net zero carbon emissions for the entire value chain.	2030 Sustainable Development Strategy explicitly targets supply chain management. Suppliers must actively avoid acquiring, trading, possessing or otherwise furthering the use of conflict minerals.
VEN-1242	Integrates recycled solar glass and reusable shipping infrastructure into its supply chain.	Does not engage with suppliers transacting with entities in or from the Xinjiang Uyghur Autonomous Regions of China (XUAR) that produce goods using forced labor. Localized sourcing focusing on domestic manufacturing and recycled materials.	Solar industry's first fully integrated domestic silicon solar panel roadmap.
VEN-1141	Works with suppliers transitioning to post-consumer recycled (PCR) plastics, bio-based insulation materials, and recycled metals to reduce reliance on raw virgin inputs.	Parent company requires suppliers to provide transparent, measurable evidence of their strategic roadmaps to reduce their environmental footprint.	Distributed materials are from international and domestic engineering and manufacturing sources.
VEN-309, 312, 321, 671, 676, 826	Focus on extending the life cycle of its grid assets and ensuring consumer electronics are kept out of the waste stream.	Power supply is ~100% carbon-free and renewable from regional and local resources.	Focus on long-term power purchase agreements, localized community energy infrastructure, and virtual power plant technology from regional sources.
VEN-1445 & VEN-1492	Systems designed with fewer resources to manufacture, install, and maintain, reducing the demand for newly extracted raw metals.	Regional supply chain, domestic material procurement, and strict traceability measures.	Regional fulfillment and global sourcing.
VEN-194	Insufficient info.	Insufficient info; sometimes sources natural, rot-resistant woods to minimizes chemical leaching into local watersheds compared to heavily chemically treated lumbers.	Insufficient info.
VEN-1151	Focus on sustainable management, structural repair, and material longevity. Prioritize structural repair over replacements.	When new material is required, wood from sustainable forestry practices is prioritized.	Local sourcing, procurement from regional businesses and local agricultural suppliers to source construction materials, equipment, and specialty items.
VEN-206	Focus on maximizing the performance and extending the lifespan of existing clean energy hardware. Developing strategies with supplier partners to repurpose and recycle certain components to contribute to a more sustainable supply chain.	Committed to reducing carbon footprint throughout the supply chain. Communicates sustainability policies to key suppliers and works with them to track carbon emissions data relating to the supply chain.	Committed to responsible sourcing practices and aims to avoid contributing to conflict through procurement activities. Prioritizes purchasing parts and products containing minerals procured through validated conflict-free supply chains and expect suppliers to adhere to the same standard.
VEN-1377	Insufficient info.	Insufficient info.	Insufficient info.
Total Suppliers Meeting Minimum Standards	**12**	**13**	**12**
Percent of Suppliers	**60%**	**65%**	**60%**

Supply Chain Analysis

(continued)

Vendor ID	Operations Impact & Land Preservation	Product End-of-Life & Circularity	Supplier Environmental Due Diligence	Published ESG Report	Public EcoVadis Score
VEN-339	Local NH/VT forestry operations minimize transport emissions. Committed to sustainable and regenerative forest practices that promote healthy animal habitat, soil quality, carbon sequestration, and forest-based recreation.	Insufficient info.	Insufficient info.	No	No
VEN-1120	Localized logistics chain; minimal field site footprint from installations.	Insufficient info.	Insufficient info.	No	No
VEN-575	Implements land preservation, ecosystem protection, and biodiversity management practices over project lifecycle. Installation projects cover significant acreage and impact land usage, habitats, and topsoil. Manufacturing produces chemical contamination and waste.	Global take-back and recycling partnerships, panels designed so 95% of materials can be disassembled, recovered, and recycled back into raw materials. 94% total waste recycled and reused in 2024.	Strict Supplier Code of Conduct, third-party ESG audited.	Yes	Silver
VEN-1259	Horizontal directional drilling under roads, wetlands, and existing structures reduces soil erosion, protects local flora, and prevents damage to local landscapes. Vacuum excavation lowers the risk of tree root damage or striking underground pipelines, preventing soil and chemical contamination.	Insufficient info.	Insufficient info.	No	No
VEN-1090	Operations require ledge drilling and blasting, and clearing vegetation. Vacuum excavation and swamp matting is used to protect soil/root systems.	Insufficient info.	Insufficient info.	No	No
VEN-143	Field operations designed to minimize environmental disruption and preserve local land structures. Concrete-free ground screws and helical piles avoid soil disruption.	Prioritizes downstream waste reduction; reclaiming and recycling manufacturing scrap metal, cardboard, and plastics; optimizing shipping configurations to reduce downstream packaging waste.	Regular CSR reporting and supply chain risk management.	Yes	No
VEN-805	Minimal impact, data suggests large-scale solar operations affect a tiny fraction of rural and farming land, less than 0.05% of total U.S. agricultural acreage	High recyclability, hardware is engineered to ensure that components remain highly recyclable when the infrastructure reaches its 30-year end-of-life cycle.	Parent company suppliers are vetted against legal, quality, environmental, and social standards. Third-party compliance relies on regular supply chain audits utilizing ISO 9001 (Quality Management), ISO 14001 (Environmental Management), and ISO 45001 (Occupational Health & Safety) frameworks.	Yes	No
VEN-603	Physical and ecological impact on the local land. Large transmission line project criticized for fragmenting and deforesting mature forest habitats. DEP required the parent company to permanently conserve 50,000+ acres of wilderness. 77% of the conserved land was previously harvested timberland, it will take several decades to mature into a high-value ecosystem.	Only operates as a transmission and distribution utility.	Parent company has a comprehensive platform to manage, evaluate, and risk-rate all of its suppliers.	Yes	No
VEN-388	Operations require soil alteration, vegetation removal, geology disruption, and impacts biological diversity.	Recycles land-clearing timber and brush into wood chips keeping organic matter out of landfills.	Insufficient info.	No	No
VEN-1289	Deploys precast concrete ballasted foundations that rest above ground, bypassing underground trenching and putting solar on otherwise unbuildable land, such as Brownfields.	Insufficient info.	Insufficient info.	No	No
VEN-132	Minimal impact, specializes in electrical contracting, commercial/industrial wiring, solar installations, and HVAC services. Local fleet emissions.	Insufficient info.	Insufficient info.	No	No
VEN-116	Utility-scale PV installations alter land surfaces and disturb vegetation during construction. Ground-mounted utilities engineered to fit natural terrain to minimize soil grading, preserve natural hydrology, and prevent erosion. Dual-use solar infrastructure integrates land preservation, agriculture, and animal husbandry. Prioritizes brownfield or non-sensitive terrain to avoid disrupting natural ecosystems.	Does not currently offer product take-back or recycling program for out-of-warranty or end-of-life inverters and energy storage systems. Committed to end-of-life treatment of sold products by 2050.	Third-party ESG risk management and supply chain compliance platforms to vet its upstream partners. Suppliers are subjected to rigorous due diligence regarding cross-continental carbon footprint reductions, waste management, and transparent reporting before they can be integrated into the manufacturing line	Yes	Gold
VEN-1242	Operations primarily localized at domestic manufacturing hub.	No take-back product end of life or recycling program.	Performs supplier due diligence and sets environmental and ethical standards for its supply chain, focuses on working conditions, ethical sourcing, and expanding domestic traceability, such as avoiding forced labor in polysilicon supply chains.	No	No
VEN-1141	Intensive logistics network, large-scale warehousing, and regional delivery fleet operations.	No take-back product end of life or recycling program.	Follows parent company's Business Partners Code of Conduct which legally and ethically binds its supply chain to strict environmental and human rights standards.	Yes	Platinum (parent company)
VEN-309, 312, 321, 671, 676, 826	New infrastructure projects balanced with land preservation initiatives.	Incorporates resource efficiency, grid-level asset sharing, and second-life energy storage strategies that mimic circular economy principles.	B Corp certified, incorporate environmental standards and due diligence into their supplier procurement, contracting, and power-purchasing activities.	No	No
VEN-1445 & VEN-1492	Seeks to minimize soil disruption, eliminating the need for heavy land grading, and enabling dual-use land productivity through specialized solar mounting and tracking technologies.	Their galvanized steel and metal components are corrosion-resistant and completely recyclable.	Insufficient info.	No	No
VEN-194	Operations impact soils, vegetation, and wildlife corridors.	Insufficient info.	Insufficient info.	No	No
VEN-1151	Regional operational footprint, serves the greater New England region. Their materials are hauled, distributed, and utilized across local properties.	Insufficient info.	Insufficient info.	No	No
VEN-206	Does not directly build or operate heavy physical infrastructure that disrupts land.	Parent company certifies that applicable material, including Lithium-Ion and Polymer batteries, are appropriately recycled in compliance with local, state, and federal regulations. No product end-of-life take-back program.	Parent company screens their suppliers annually using third-party verification to eliminate risks like forced or child labor.	Yes	No
VEN-1377	Operational impacts on land revitalize underutilized spaces while providing ecological benefits, frequently sites projects on brownfields, landfills, and reclaimed gravel pits, transforming unproductive or degraded land into clean energy assets.	Insufficient info.	Insufficient info.	No	No
Total Suppliers Meeting Minimum Standards	**17**	**8**	**9**	**7**	**3**
Percent of Suppliers	**85%**	**40%**	**45%**	**35%**	**15%**

Supply Chain Analysis

(continued)

Vendor ID	ERS Foundation Score	Supplier Code of Conduct	Modern Slavery Policy	Human Trafficking Policy
VEN-339	No	Insufficient info.	Insufficient info; the company operates under standard federal and state labor laws.	Insufficient info; the company operates under standard federal and state labor laws.
VEN-1120	No	Insufficient info.	Insufficient info; legally mandated to adhere to the federal Fair Labor Standards Act.	Insufficient info; legally mandated to adhere to the federal Fair Labor Standards Act.
VEN-575	10%	The Supplier will comply with all applicable laws respecting human rights.	Suppliers will not engage in, and will comply with all applicable laws, rules and regulations concerning, forced labor and modern slavery, including without limitation the use of child labor, involuntary servitude, debt bondage, and human trafficking.	Suppliers will not engage in, and will comply with all applicable laws, rules and regulations concerning, forced labor and modern slavery, including without limitation the use of child labor, involuntary servitude, debt bondage, and human trafficking.
VEN-1259	No	Insufficient info.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-1090	No	Insufficient info.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-143	No	Parent company committed to developing products and services that reduce environmental impact and improve quality of life. Suppliers engaging in human rights violations will have all business arrangements nullified immediately.	Does not tolerate any forms of child labor, slavery, human trafficking, or any other related acts of forced labor or servitude.	Does not tolerate any forms of child labor, slavery, human trafficking, or any other related acts of forced labor or servitude.
VEN-805	No	Parent company strives to achieve transparency with vendors, focusing on supply chain management issues, ethical procurement, and legal compliance. Suppliers should not tolerate discrimination, harassment or retaliation, and should provide a safe, secure and healthy workspace.	Suppliers should not engage in human trafficking, modern slavery, use child labor or otherwise use forced, prison or compulsory labor, or source materials that directly or indirectly finance or benefit armed groups.	Suppliers should not engage in human trafficking, modern slavery, use child labor or otherwise use forced, prison or compulsory labor, or source materials that directly or indirectly finance or benefit armed groups.
VEN-603	No	Parent company focused on working together to build a more accessible clean energy model that promotes healthier, more sustainable communities. Committed to respecting and protecting human rights.	Suppliers expected to comply with all applicable employment laws, rules, and regulations regarding forced or compulsory labor, including slavery, and use of prison labor.	Suppliers expected to comply with all applicable employment laws, rules, and regulations regarding human trafficking.
VEN-388	No	Insufficient info.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-1289	No	DCE Solar manages vendor compliance and quality standards through an active Approved Vendor List (AVL). It is refreshed quarterly to reflect the latest approved standards. The current version is available by request.	Insufficient info; domestic manufacturing model reduces the risk of fair labor and forced labor associated with international solar supply chains.	Insufficient info; domestic manufacturing model reduces the risk of fair labor and forced labor associated with international solar supply chains.
VEN-132	No	Insufficient info.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-116	No	Expects suppliers to support and respect internationally proclaimed human rights that are expressed in the International Bill of Human Rights, and ensure they are not involved in human rights violations.	Suppliers must not use any form of forced, bonded, compulsory labor or modern forms of slavery.	Suppliers must not use any form of forced, bonded, compulsory labor or modern forms of slavery.
VEN-1242	No	Committed to ensuring the fundamental human rights of workers are protected. Engages with suppliers that are committed to the same principles.	Committed to ensuring the fundamental human rights of workers are protected, including addressing the potential risks of forced labor, child labor, servitude, human trafficking, and slavery across our supply chain.	Committed to ensuring the fundamental human rights of workers are protected, including addressing the potential risks of forced labor, child labor, servitude, human trafficking, and slavery across our supply chain.
VEN-1141	No	Parent company strives for long-term good business relationships and a healthy collaboration with suppliers. Suppliers must make reasonable efforts to ensure that no violations of environmental standards, human rights, labour rights, health and safety, anti-corruption, or other financial crimes occur within the value chain.	Suppliers must not engage in any form of slavery, forced labour, bonded labour, trafficking, or involuntary work.	Suppliers must not engage in any form of slavery, forced labour, bonded labour, trafficking, or involuntary work.
VEN-309, 312, 321, 671, 676, 826	No	Insufficient info; Code of Ethics does not apply to suppliers.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-1445 & VEN-1492	No	Insufficient info.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-194	No	Insufficient info.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-1151	No	Insufficient info.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-206	No	Committed to upholding and protecting human rights throughout all aspects of its business.	Pursuant to Section 54 of the UK Modern Slavery Act and California Transparency in Supply Chains Act, requiring supply chain due diligence. Public disclosure required related to business processes and associated steps undertaken to address the risk of slavery and human trafficking in company's operations and supply chain.	Expects partners to prohibit all forms of human trafficking, discrimination, and harassment. Partners are expected to advance diversity, inclusion, and equal opportunities throughout their own supply chain, provide a safe and healthy work environment, and comply with all minimum wage and working hours regulations.
VEN-1377	No	Insufficient info.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
Total Suppliers Meeting Minimum Standards	**1**	**9**	**8**	**8**
Percent of Suppliers	**5%**	**45%**	**40%**	**40%**

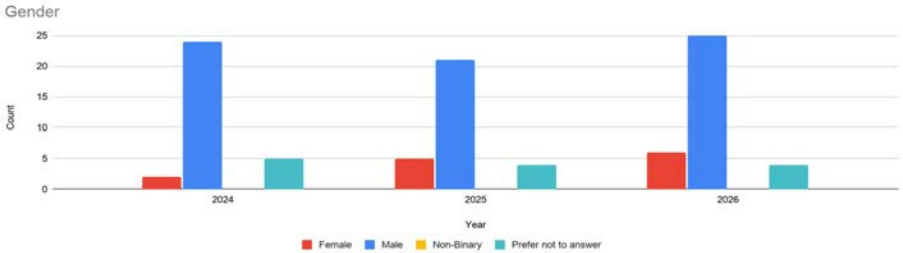
Supply Chain Analysis

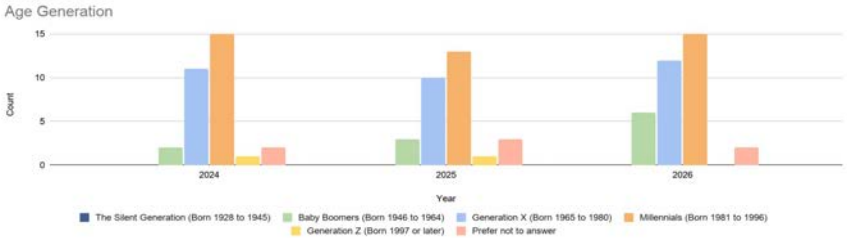
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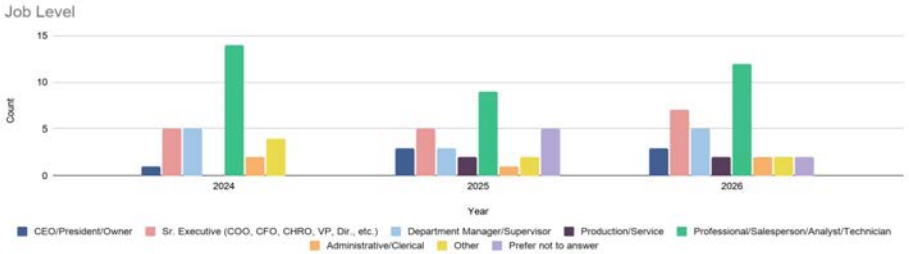
Vendor ID	Child Labor Policy	Safe Workplace Policy	Alignment with UDHR & ILO	Requires Violation Reports
VEN-339	Insufficient info; the company operates under standard federal and state labor laws.	Insufficient info; the company operates under standard federal and state labor laws.	Insufficient info; the company operates under standard federal and state labor laws.	Insufficient info.
VEN-1120	Insufficient info; legally mandated to adhere to the federal Fair Labor Standards Act.	Insufficient info; legally mandated to adhere to the federal Fair Labor Standards Act.	Insufficient info; legally mandated to adhere to the federal Fair Labor Standards Act.	Insufficient info.
VEN-575	Suppliers will not engage in, and will comply with all applicable laws, rules and regulations concerning, forced labor and modern slavery, including without limitation the use of child labor, involuntary servitude, debt bondage, and human trafficking.	Requires complicance with occupational health and safety requirements.	Requires supplier compliance with the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.	If supplier suspects a violation of this code has or may have occurred (or may occur in the future) the supplier must notify Canadian Solar promptly.
VEN-1259	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info.
VEN-1090	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info.
VEN-143	Does not tolerate any forms of child labor, slavery, human trafficking, or any other related acts of forced labor or servitude.	Suppliers must follow all applicable laws and regulations for the health and safety of employees and contractors working for the supplier. Reserves the right to certify compliance with the stated standards.	Suppliers expected to adhere to the The United Nations International Human Rights Law, the Universal Declaration of Human Rights, the International Labor Organizations (ILO) core labor standards, and the United Nations Global Compact Principles.	Not required; expects compliance with the ethical, labor, health, safety, environmental, quality, employee, and management responsibilities and standards.
VEN-805	Suppliers should not engage in human trafficking, modern slavery, use child labor or otherwise use forced, prison or compulsory labor, or source materials that directly or indirectly finance or benefit armed groups.	Suppliers should provide a safe, secure and healthy workspace.	Expects suppliers to commit to respecting human rights as set out in the United Nations Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration of Fundamental Principles and Rights at Work and adheres to the principles set out in the United Nations Guiding Principles on Business and Human Rights.	Not required; expects suppliers to maintain appropriate records and to make them available upon request.
VEN-603	Suppliers expected to comply with all applicable employment laws, rules, and regulations regarding child labor, including minimum hiring age limits.	Committed to the health, safety and well-being of all employees, contractors and members of the public. Suppliers expected to comply with all applicable employment laws, rules, and regulations regarding health and safety.	Guided by international human rights principles in the Universal Declaration of Human Rights, the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, and the UN SDGs.	Request suppliers to contact if they become aware of potentially unethical or illegal practices. Suppliers responsible for recognizing these situations and acting accordingly.
VEN-388	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info.
VEN-1289	Insufficient info; domestic manufacturing model reduces the risk of child labor associated with international solar supply chains.	Insufficient info.	Insufficient info; domestic manufacturing model reduces the risk and need to make commitments to international labor laws.	Insufficient info.
VEN-132	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info.
VEN-116	Complies with ILO Convention as it relates to the employment of children.	Committed to maintaining safe workplaces and have developed multiple safety guidelines, procedures and policies.	Adheres to the Universal Declaration of Human Rights and the United Nations Global Compact (UNGC).	Suppliers must identify human rights impacts, implement mitigation actions, and provide remedial action in the event of human rights violations. Risk assessment and management prevention model identifies, prioritizes, and assigns responsibilities. Threats managed through prevention, surveillance and countermeasures.
VEN-1242	Committed to ensuring the fundamental human rights of workers are protected, including addressing the potential risks of forced labor, child labor, servitude, human trafficking, and slavery across our supply chain.	Suppliers are required to provide workers with a safe and healthy work environment.	Standards derived from the United Nations Guiding Principles on Business and Human Rights, the Core Conventions of the International Labour Organization (ILO), including the ILO Declaration on Fundamental Principles and Rights at Work, the Solar Energy Industries Association Solar Industry Commitment to Environmental & Social Responsibility, and the Responsible Business Alliance Code of Conduct.	Expects suppliers to establish a process to identify the environmental, health, safety, and ethical risks associated with their operational and labor practices. In addition, management must develop appropriate processes to control identified risks and ensure regulatory compliance.
VEN-1141	Child labour is prohibited, suppliers may not employ children, directly or indirectly.	Suppliers must ensure that employment conditions do not cause insecurity and social or economic vulnerability for its employees. Supports international standards on human rights, working conditions, the environment and anti-corruption.	Code of Conduct based on conventions including the UN Global Compact and International Labour Organization (ILO) Conventions Labour and Decent Work. All known or suspected violations of this policy must be reported, addressed, and followed up.	Suppliers must ensure that systems are in place to detect, assess, avoid and respond to potential health and safety threats.
VEN-309, 312, 321, 671, 676, 826	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-1445 & VEN-1492	Insufficient info; governed by standard federal regulations.	Insufficient info; requires contractors to follow all applicable OSHA Guidelines and local or state safety regulations during assembly and construction.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-194	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-1151	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
VEN-206	Opposes all forms of forced (including bonded) or child labor in accordance with the principles outlined in accordance with the ILO Minimum Age and Abolition of Forced Labor Conventions. Expects partners to prohibit all forms of forced and child labor, discrimination, and harassment.	Stem's partners are expected to provide a safe and health work environment for all employees. This includes complying with all federal, state, and local health and safety laws, and implementing policies and procedures to identify and mitigate health and safety risks.	Committed to upholding and protecting human rights throughout all aspects of its business. Approach to human rights is guided by the United Nations Universal Declaration of Human Rights, United Nations Guiding Principles on Business and Human Rights, and the International Labor Organization's (ILO's) Fundamental Conventions.	Annual annual third-party auditing, suppliers required to disclose labor practices and policies. Suppliers encouraged to ensure their own suppliers, vendors, contractors, and all other business partners also align their policies and procedures.
VEN-1377	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.	Insufficient info; governed by standard federal regulations.
Total Suppliers Meeting Minimum Standards	**8**	**8**	**8**	**8**
Percent of Suppliers	**40%**	**40%**	**40%**	**40%**

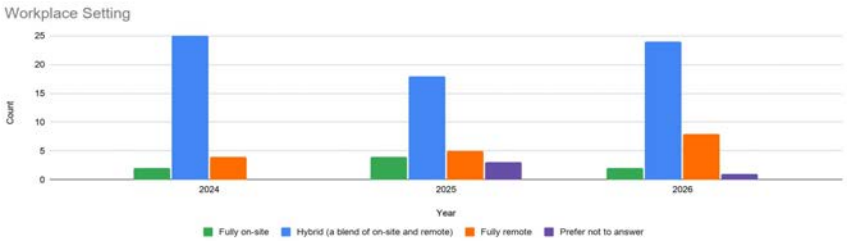
Staff Stats

Norwich Technologies strives to create a diverse and inclusive workforce. Our staff has a wide range of ages, experience levels and we continue to improve gender balance. Here, we reference data from the Best Places to Work annual surveys over the past 3 years. At the time of publication, we employ 42 full-time staff: 29 salaried workers, and 13 hourly employees. We also have two part-time contractors. Four of our staff are military veterans.









JEDIB Action Plan

The 20 action items are listed by Category and Priority Level

Evaluation & Metrics

High Priority:
- JEDIB Evaluation (complete)
- Worker-related Metrics

Medium Priority :
- Digital Communications Accessibility Assessment (internal)
- Website Accessibility Assessment (external)

Low Priority :
- Carry out an equity audit
- Operalization of DEI principles

Education & Engagement

High Priority:
- JEDIB Discussion
- JEDIB Statement (complete)

Low Priority:
- Mentoring Opportunities

Action, Policies & Practices

High Priority:
- Inclusive Language Guide (complete)
- Ethical Communications and AI Use (complete)
- Create a JEDIB Action Plan
- Implement inclusive Hiring practices (ongoing)
- Onboarding processes

Medium Priority :
- Collective Action to promote JEDIB Principles (ongoing)
- Additional Types of Paid Leave
- Supplier Diversity
- Annual Employee reviews

Low Priority :
- Policy And Employee Handbook Review
- Affinity Group Support