



INFORMATION SECURITY POLICY

GENERAL POLICY

1. INFORMATION SECURITY POLICY

This policy aims to formalize and solidify OPDENERGY HOLDING, S.A.U.'s (hereinafter referred to as "OPDENERGY") commitment to information security, being highly dedicated to providing the utmost security for the information handled in the operation of the business as an independent renewable energy producer.

At OPDENERGY, we commit to establishing and maintaining an Information Security Management System that allows us to:

- Identify and minimize the risks to which information is exposed.
- Establish a culture of information security.
- Ensure compliance with applicable legal, contractual, regulatory, and business requirements.
- Reduce operational and financial costs.

OPDENERGY presents and adopts this policy, which aims to ensure the confidentiality, integrity, availability, and privacy of information, as well as compliance with the various applicable laws and requirements in effect at all times, maintaining a balance between risk levels and the efficient use of resources through proportionality criteria. In fact, it provides a framework for establishing information security guidelines through the following principles

- Ensure that security is an integral part of the information systems lifecycle through proper management of risks and weaknesses associated with information systems.
- Protect the information generated, processed, or stored by various processes, its technological infrastructure, and assets against threats from both internal and external sources, ensuring compliance with the principles of confidentiality, integrity, availability, and legality of information.
- Guarantee the availability of its processes and the continuity of its services based on the impact that adverse events may generate.
- Comply with legal and contractual requirements, as well as any other requirements that OPDENERGY subscribes to.
- Inform all employees of their functions, obligations, and responsibilities regarding information security and personal data protection.
- Promote awareness and sensitivity regarding Information Security and the protection of personal data.
- Adopt continuous improvement as a strategic value and apply it to all aspects of OPDENERGY's management, conducting necessary internal audits, implementing appropriate actions, and establishing suitable objectives.



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- Encourage communication and collaboration with stakeholders by creating, whenever possible, relationships based on trust, loyalty, transparency, mutual respect, and reciprocal contribution to improve the efficiency and security of our facilities, processes, and services.
- Ensure diligence from all employees and collaborators in reporting potential security incidents and guarantee their proper management.

OPDENERGY adopts in this policy the establishment of the necessary controls to periodically measure and improve each of the declared principles, as well as to provide the means and resources needed for the implementation of the information security management system and the necessary controls for its compliance.

This policy was approved by the OPDENERGY Management Committee on February 14, 2025, and it will be their responsibility to maintain it.

We are committed to disseminating this policy to clients, employees, and other stakeholders.