



HARASSMENT PREVENTION POLICY

GENERAL POLICY

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1. INTRODUCTION, SUBJECT MATTER, SCOPE, AND APPLICATION

Opdenenergy Holding, S.A. (from now on, "**Opdenenergy**" or the "**Organisation**") is an organisation with international presence, in continuous expansion and that focuses its activity in the production of energy assets and the management of all its phases: development, financing, construction, operation and maintenance.

The growth of the Organisation must safeguard the dignity of all the people who make up the Organisation, undertaking to create and maintain a working environment that respects dignity and personal freedom. At all times, the Organisation must reject behaviour and situations of harassment at work, including moral, sexual, gender-based or any other kind, undertaking to:

- Consolidate a working environment where people can work in a harassment-free environment.
- Promote ethical conduct among its employees and involve them in ensuring a respectful environment.
- Prevent the commission of any conduct that could be typified as an attack on the sexual indemnity and freedom of any employee of the company.
- Implement the necessary mechanisms to detect and eliminate any situation of harassment with due guarantees.
- To report any suspicion of crime or conduct of this nature, determining the action to be taken in each case.

For this reason, the Board of Directors of Opdenenergy has decided to approve and implement the present Policy for the Prevention of Workplace Harassment (the "**Policy**"), which aims to develop the basic principles on human and workers' rights concerning workplace harassment set out in the "**Code of Ethics**" to govern the Organisation's behaviour in this matter through a series of guidelines and rules of conduct.

This Policy applies to all the activities, companies, areas and subsidiaries that form part of the Opdenenergy Group, comprising the parent company Opdenenergy Holding, S.A. and its subsidiaries.

The content of this document must be respected by all management bodies and members of the organisation (employees and other parties acting on behalf of the organisation), regardless of their hierarchical level, business area, geographical location or the Group company to which they belong.

2. PRINCIPLES AND RULES OF CONDUCT

Compliance with applicable regulations:

Opdenenergy and its members undertake to respect and comply with all applicable regulations, including legal and regulatory requirements and other requirements to which the Organisation subscribes.

Particular attention should be paid to the legal framework of the geographical scope (international, national and local), as well as to the applicable standards and reference regulations.

Behaviour constituting harassment at work:

The Organisation and its members, as well as third parties acting on their behalf, must avoid attitudes and behaviours that may involve harassment at work, as well as any other type of inappropriate behaviour reflected in the "Code of Ethics". Annex I to this Policy contains a non-exclusive list of attitudes and behaviours that may constitute harassment.

In general, behaviours constituting harassment at work are those exercised by a person or groups of people with the purpose or effect of violating dignity, creating an intimidating, degrading or offensive environment for the victims, and may be classified as moral, sexual or gender-based harassment.

Types of harassment in the workplace

We can distinguish three types of harassment:

- Downward harassment: systematic and prolonged pressure exerted by a superior on one or more workers.
- Horizontal harassment: pressure exerted systematically and over a long period of time by a worker or a group of workers on one of their colleagues.
- Upward harassment: pressure exerted systematically and over a long period of time by a worker or group of workers on their hierarchical superior.

Measures to be taken by the organisation to prevent harassment at work:

In general, the Organisation must implement measures to guarantee the prevention of and response to alleged conduct constituting harassment in the workplace. For this reason, the Organisation must establish the necessary measures to clarify and resolve such behaviour by means of an action procedure, in addition to preventing possible specific events or conflicts from becoming habitual and leading to harassment in the workplace.

Under this pretext, the procedures to be developed by the Organisation must ensure that:

- Ensure a fair hearing and fair treatment for all those involved in the investigation and resolution of the facts by involving trained personnel, acting in good faith throughout the process,
- Guarantee the right to equality and non-discrimination in the work environment, ensuring that any person can request a mediatory action that is promptly and diligently elucidated, paying special attention to the protection of the privacy and dignity of the persons concerned, ensuring the confidentiality of the information collected,
- The persons concerned are accompanied and advised by one or more people they trust in the company's environment.
- Enable the right to information of all persons involved, in particular about their rights and duties; in phases of the open process; and, depending on the characteristic, the participation and outcome of the phases.
- Ensure that no person involved should suffer reprisals for participating in the process of reporting or denouncing a situation of harassment, and that precautionary measures may be proposed if during the procedure and until its closure there are indications of harassment.

Dissemination, information, and evaluation of the working environment:

In general, the Organisation must inform its members and third parties acting on its behalf of the mechanisms for prevention and action in the event of workplace harassment. This information must



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be disseminated through the organisation's usual communication channels (e-mail, official notice boards, corporate intranet, etc.).

In addition, the organisation can assess the working environment to detect possible situations that could lead to harassment at work and analyse the performance of the procedure with the compliance body.

Consolidation of the Anti-Bullying Commission

For the investigation and response, an Anti-Harassment Committee will be set up comprising the heads of the following areas: Internal Audit, Compliance, Legal and Human Resources.

3. INVESTIGATION AND RESPONSE GUIDELINES

Regardless of the stages set out in this document, the victim may at any time initiate legal action before the appropriate judicial or administrative bodies applicable within the legal framework of the relevant geographical area in each case.

3.1 INITIATION OF THE PROCEDURE

In general, the Organisation's whistleblowing channel (compliance@opdenenergy.com) should be used to report alleged cases of workplace harassment to the body responsible for supervising the operation and observance of the Compliance Management and Crime Prevention Model.

The process can be initiated by:

- The person affected by any situation of harassment at work.
- Any member of the Organisation who becomes aware of harassing conduct at work.

For proper investigation and response, a report of harassment should contain as a minimum:

- Identification and/or signature of the person concerned.
- Identification of the person making the complaint, if other than the person concerned.
- Facts on the basis of which the complainant considers that there is harassment.
- Name of the person who is allegedly committing such harassment.

3.2 DEVELOPMENT OF THE PROCEDURE

3.2.1 MEDIATION PHASE

The aim of this phase is to resolve the conflict through dialogue with the intervention of a mediator and to establish measures to avoid its repetition. This process might take up to **15 business days waiting period**.

The Commission should:

- Meet with the person concerned to gather information on the case within **3 working days of receipt of the notification** and with the accused party to inform them of the commencement of the procedure. The affected worker may attend this meeting, if he/she so wishes, accompanied by witnesses and/or employee representatives. These meetings shall be held under the principle of good faith and with the aim of having an initial assessment of the facts, as well as the possible seriousness, for which the affected party shall be attended, and measures shall be proposed to resolve the situation as far as possible.

- Take precautionary measures on a case-by-case basis.
- Initiate and maintain a case file record

3.2.2 PRE-TRIAL PHASE

It is initiated if, after the mediation phase, the affected party does not state in writing that the situation has been resolved. This process might take up to **30 business days waiting period**.

The Commission should:

- Conduct the analysis of the case and may request additional information and convene additional meetings with the parties concerned. Witnesses proposed by both parties may also be heard for this purpose.
- In cases of sexual harassment or harassment based on sex or gender, additional precautionary measures shall be proposed and immediately communicated to the management of the organisation.
- Analyse all documentary and testimonial evidence provided by both parties.
- To take minutes of the meetings held and complete the dossier opened in the mediation phase.

3.2.3 NOTIFICATION OF THE FACTS TO THE MANAGEMENT

Following the meetings deemed necessary at the previous stage, the Commission should meet with the Steering Committee to present the findings of the investigation report.

In the event that no consensus is reached within the Committee on the results provided by the Committee, the Management Committee of the company must determine the veracity or otherwise of the complaint and the measures to be implemented as the case may be. This process has a **maximum duration of 10 working days**.

3.2.4 COMPLETION OF THE PROCEDURE

In this last phase, the organisation must implement the measures agreed by the Management Committee. In any case, a communiqué must be issued informing the complainants and the persons reported of the final result of the measures to be taken or recommendations to be followed depending on the final result of the process in order to close the file. This process has a **maximum duration of 10 working days**.

3.2.5 FOLLOW-UP

In order to ensure the cessation of the harassment, the Anti-bullying Committee must monitor the evolution of the case at the established intervals after the end of the process.

Such a Commission should ensure that there are no reprisals against the complainant or persons who have assisted in the process.

In the event of reprisals or prejudice of a labour-related nature, the persons concerned have the right to be restored to the conditions they were in before the reprisals began.



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4. MONITORING AND ENFORCEMENT OF THE PROTOCOL FOR THE PREVENTION OF HARASSMENT AT WORK

The Organisation shall monitor and control that the principles set out in this Protocol for the Prevention of Workplace Harassment are applied by all its internal stakeholders.

The Management Committee ensures that the necessary resources are available for compliance and requests all persons working on behalf of the organisation to actively participate in and contribute to the effectiveness of the workplace harassment prevention model.

The Organisation also asks all its stakeholders (internal or external) to report potential risks or non-compliance when they consider that the principles of this document are being contravened, through the whistleblowing channel compliance@opdenenergy.com.

The Organisation shall ensure that access to the reported facts is completely restricted, secure and confidential, treating the information received anonymously and in accordance with the applicable privacy and data protection regulations (except in those cases that must be communicated to the authorities in accordance with the legislation in force).

The Organisation shall be responsible for implementing the disciplinary system and taking the relevant measures reflected in the procedure for the prevention of harassment at work. It shall also ensure that the necessary periodic checks and modifications are carried out.

The Board of Directors of Opdenenergy.

This document has been translated. For any doubt or misunderstanding please refer to the official version approved by the Organization.