OPDENERGY'S SUSTAINABILITY POLICY

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1. OBJECTIVE OF THE POLICY

The Board of Directors of Opdenergy Holding S.A. and its companies (hereinafter "Opdenergy" or the "Organization") undertakes through this policy to continue advancing in the performance of its activities in a responsible manner and contributing to the sustainable development based on environmental, social and governance (ESG) aspects of the territories in which it operates. Through its Sustainability Policy, Opdenergy focuses on making the most of the opportunities offered by the transition to a low-carbon economy and the management of significant risks.

This policy will be applied assuming basic principles of action within sustainable management and **will be materialized through specific objectives and actions framed in the Organization's Sustainability Strategy, so that its performance is based on the creation of value in the medium and long term.**

1.1 ALIGNMENT WITH THE SUSTAINABLE DEVELOPMENT GOALS:

With this policy, Opdenergy's commitment to its stakeholders is aligned with the Sustainable Development Goals (SDGs) of the United Nations (UN) and bases its Sustainability Strategy on them.

The priority SDGs for the Organization are:

Affordable and clean energy

Climate action

Life on land

2. SCOPE OF APPLICATION:

This Policy will be applicable to all employees of the Organization, subsidiaries, administrators, legal representatives, employees and all those who provide their services, as well as collaborators, professionals or subcontracted entities. Similarly, it will be applicable in all geographies in which the Organization operates and in all phases of its activity: development, financing, investment and divestment, construction, operation and maintenance.

In addition, Opdenergy will encourage the entities and organizations that form part of its stakeholder groups and supply chain to align themselves with this Policy.

3. GOVERNANCE PRINCIPLES

This Sustainability Policy is integrated into the company's corporate governance system, ensuring:

- Supervision at the highest level by the Board of Directors.
- Cross-cutting integration across all business areas and corporate functions.
- Shared responsibility between the different organizational levels.
- Continuous monitoring and improvement through indicators and *periodic reporting*.

3.1 ROLE OF THE BOARD OF DIRECTORS

The Board of Directors is responsible for approving the Sustainability Policy and its updates. It is also responsible for the approval of the company's Sustainability Strategy. Therefore, it is the body in charge of defining the strategic vision in terms of Sustainable Development in the Organization.

The Board is regularly informed of compliance with the commitments of the Policy and the milestones related to the achievement of the objectives and specific actions derived from the Sustainability Strategy.

3.2 ROLE OF THE EXECUTIVE MANAGEMENT COMMITTEE:

The Executive Management Committee must act as a transmitter of the principles, objectives and commitments adopted by the Board through this Policy and integrate Sustainability into the corporate strategy and business model. On the other hand, it must monitor the effective application of the Policy in day-to-day business activity, as well as the achievement of the objectives and specific actions derived from the Sustainability Strategy.

In addition, it reports to the Board of Directors on the progress made in the application of this Policy.

3.3 ROLE OF THE SUSTAINABILITY DEPARTMENT

The Sustainability area must develop and update Opdenergy's Sustainability Strategy as well as implement the critical actions that will lead to the achievement of the objectives framed in the Strategy and the performance evaluation.

Additionally, it coordinates the reporting of information to the Executive Management Committee and to the different stakeholders.

It must promote the culture of Sustainability in the Organization through awareness-raising and advisory actions in the operational and business areas.

4. OPDENERGY'S PRINCIPLES AND COMMITMENTS TO SUSTAINABILITY

Opdenergy, in its statement of principles, establishes its fundamental vision and mission for the development and execution of this Policy.

Mission: To meet the energy needs of the market with competitive and reliable solutions, based on the use of renewable sources"

Vision: "To be a global benchmark in energy projects, to offer high returns to shareholders and to promote sustainable development

On the other hand, this Sustainability Policy is based on the main international standards and commitments in the field of the environment, human and labour rights, including:

- Universal Declaration of Human Rights
- International Labour Organization (ILO) Convention
- Principles of the United Nations Global Compact
- UN Sustainable Development Goals
- Objectives linked to the Paris Agreement against Climate Change
- Equator Principles

Other policies of Opdenergy related to and complementary to this Policy are:

• **C-OPD-CA-EX-0001 Environment, Quality and Health and Safety Policy**
• **C-OPD-RC-EX-0002 Code of Ethics**
• **C-OPD-RC-EX-000 Anti-Corruption Policy**
• **Equality Statement**
• **C-OPD-RH-EX-0003 Workplace Harassment Prevention Policy**
• **M-OPD-RC-IN-0001-A01 Risk Management Policy**
• **C-OPD-RC-EX-0004 Internal Information System Policy**
• **C-OPD-RC-EX-0007 Human Rights Policy**

- **P-OPD-PU-IN-0002 Corporate Supplier Approval Procedure**

In this regard, the Organization, through the execution of its Sustainability Strategy, assumes the following commitments:

4.1 ENVIRONMENTAL COMMITMENTS:

- **Seek to prevent, reduce and compensate for the environmental and landscape impact of its activities in the territories where it operates**. In addition, it will promote a rational and sustainable use of natural resources, including water, in projects, improving environmental performance through the establishment of environmental management systems.
- **Respect and promote biodiversity, trying to prevent and minimize negative impacts** on it by carrying out the relevant environmental studies, proper environmental management of energy assets and their environment, from promotion to operation and the end of their life cycle. Prepare an information report in accordance with the applicable regulations and the best international standards.
- **Promote an alignment of their activities with the European Green Taxonomy,** identifying and reporting those that contribute substantially to environmental objectives.
- **Contribute to the energy transition, reinforcing its commitment to decarbonization through mitigation objectives and actions** (emissions inventory, decarbonization plans, sustainable mobility).
- **Take climate adaptation into account in the execution and operation of projects** through an adequate identification and assessment of climate risks, trying to incorporate climate resilience criteria in the development of their activity.
- **Promote efficient energy management at the corporate level** by applying good environmental practices in the company's offices and optimizing energy efficiency in energy assets with the aim of reducing emissions and maximizing renewable energy generation.

4.2 SOCIAL COMMITMENTS

- To create fair and safe work environments, providing the necessary work and safety environment, respecting human and labour rights, as well as **to promote the professional development of workers** through continuous training programmes, performance appraisal and career plans that promote personal and professional development.

- **Reject child labour and forced or compulsory labour in all its operations and in the supply chain, ensuring decent working conditions**.
- **Ensure a safe and healthy work environment through occupational risk prevention**, continuous training and the implementation of best safety practices in all operations.
- **Promote an inclusive, diverse and discrimination-free work environment, promoting equal opportunities, gender equity and respect for diversity in all its forms,** through training and awareness-raising actions, working to reduce the wage gap between men and women and aspects of family conciliation, among others.
- **Respond to the needs and expectations of its stakeholders**, promoting dialogue and participation of stakeholders, including local communities, vulnerable groups and indigenous populations. Encourage communication through formal and informal meetings, training sessions, making mailboxes or other communication channels available to the community.
- **Contribution to socioeconomic development and participation of the local communities where the Organization operates**, through the implementation of action plans that generate social value, considering the impact on the territory and promoting initiatives that benefit local communities and society.

4.3 GOVERNANCE COMMITMENTS

- **Ensure compliance with applicable regulations**, **as well as internal regulations and codes of conduct,** implementing effective risk control and management systems.
- **Act in accordance with the highest ethical standards in the exercise of its activity based on good governance (honesty, fairness and integrity)** promoting a culture of integrity, zero tolerance for corruption, bribery and any illicit practice.
- **Ensure a solid, transparent and effective governance structure**, with decision-making bodies that act responsibly, independently and in line with the interests of the company and its stakeholders.
- **Guarantee transparency in accountability and facilitate communication channels with their stakeholders**, providing material information in a clear, truthful and simple way.
- **Promote proper risk management in the company** by integrating environmental, social and governance risks and opportunities into management and decision-making systems, including climate and regulatory risks associated with the energy sector.

- **Promote responsible management of the supply chain** by applying ethical and sustainability criteria in supplier selection and evaluation procedures.
- **Guarantee the security of information and the protection of personal data** by adopting action plans and appropriate measures to prevent cybersecurity risks, including training, information security tools, among others.

5. INTEGRATION

The Organization incorporates its commitment to sustainability into its strategy, its processes and therefore into its operating model, integrating environmental, social and governance aspects in decision-making in the different action plans and ensuring that all the entities that make it up assume responsibility for its application within their respective spheres of influence. With the aim of achieving the established goals in terms of sustainability.

This commitment is reflected in the definition of the corporate strategy that must incorporate the objectives of the sustainability strategy. It must also be reflected in the management of human resources, action procedures, in the granting of financing and investments, as well as in the processes of selection, contracting and monitoring of suppliers and collaborators.

It is the responsibility of Opdenergy's Governing Bodies to integrate the Policy into the corporate strategy and enforce it in the day-to-day of the company's activity. It is the duty of all members of the company and those to whom it applies to comply with it.

6. MONITORING, REVIEW AND COMMUNICATION

With regard to the monitoring and communication of this Policy and associated actions, both internally and externally, the Organization undertakes to ensure that stakeholders are correctly informed and aligned with the commitments adopted in this Policy.

The Policy will be reviewed at least once every two years in order to adapt it to the situation and activity of the company and the new demands and challenges in Sustainability. Updates will also be approved by the Board of Directors.

The Board of Directors of Opdenergy.