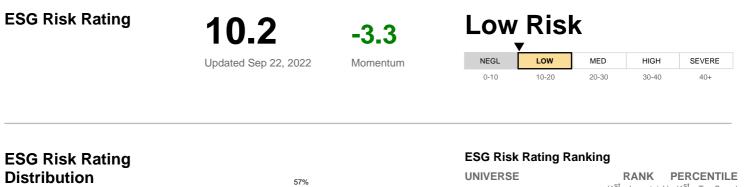
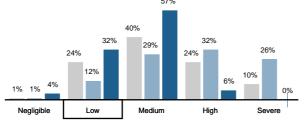
Renewable Power Production Spain MCE:GRE





UNIVERSE	(1 st = lowest risk)	(1 st = Top Score)
Global Universe	249 /15312	3rd
Utilities INDUSTRY	6 /693	2nd
Renewable Power Production SUBINDUSTRY	5 /93	5th

Peers Table

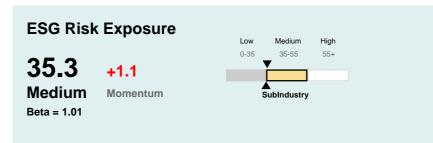
Peers (Market cap \$0.8 - \$1.0bn)	Exposure	Management	ESG Risk Rating
1. Solarpack Corporación Tecnológica SAU	30.9 Low	80.1 Strong	7.7 Negligible
2. Grenergy Renovables SA	35.3 Medium	75.1 Strong	10.2 Low
3. Concord New Energy Group Ltd.	35.7 Medium	41.2 Average	21.7 Medium
4. Energiekontor AG	34.7 Low	20.6 Weak	27.9 Medium
5. eREX Co., Ltd.	34.7 Low	10.9 Weak	31.1 High



Renewable Power Production Spain MCE:GRE

ESG Risk Analysis

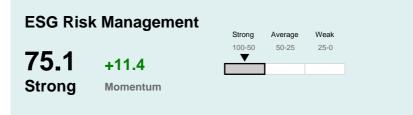
Exposure refers to the extent to which a company is exposed to different material ESG Issues. The exposure score takes into consideration subindustry and company-specific factors such as its business model.



As an integrated renewable power producer, Grenergy Renovables SA (Grenergy) develops and constructs power-generating facilities for its own business, as well as sale to other companies. Such activities typically imply the acquisition and repurposing of large surfaces of land, which may trigger community opposition and associated potential project delays. Moreover, Grenergy relies heavily on revenue derived from the development and construction of wind farms and solar plants. Malfunctions at constructed assets may raise client complaints, while also triggering penalties and other related costs. In addition, Grenergy construction workers and technicians often operate in hazardous conditions (e.g., at high altitudes or in remote areas). A poor safety record (e.g., frequent injuries) could expose the company to fines and difficulty in attracting skilled personnel.

The company's overall exposure is medium and is similar to subindustry average. Community Relations, Occupational Health and Safety and Product Governance are notable material ESG issues.

Management refers to how well a company is managing its relevant ESG issues. The management score assesses the robustness of a company's ESG programs, practices, and policies.



Grenergy's overall ESG-related disclosure was prepared in accordance with the essential option of the Global Reporting Initiative (GRI) standard for sustainability reporting. Furthermore, the company's ESG-related issues are overseen by the board, suggesting that these are integrated in core business strategy. Moreover, there is evidence that ESG targets are used to evaluate executive performance, but no such reference is made in the remuneration policy.

The company's overall management of material ESG issues is strong.



Renewable Power Production Spain MCE:GRE

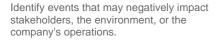
Material ESG Issues

These are the Material ESG Issues driving the ESG Risk Rating.

Issue Name	ESG Risk Exposure Score Category	ESG Risk Management Score Category	ESG Risk Rating Score Category	Contribution to ESG Risk Rating
Corporate Governance	9.0 High	59.9 Strong	3.6 Low	35.3%
Product Governance	5.3 Medium	68.8 Strong	2.0 Low	19.6%
Human Capital	4.0 Medium	70.6 Strong	1.3 Negligible	12.9%
Occupational Health and Safety	4.0 Medium	75.0 Strong	1.3 Negligible	12.7%
Community Relations	6.0 Medium	90.0 Strong	1.1 Negligible	11.2%
Business Ethics	4.0 Medium	85.0 Strong	0.8 Negligible	7.5%
Land Use and Biodiversity	3.0 Low	97.1 Strong	0.1 Negligible	0.9%
Overall	35.3 Medium	75.1 Strong	10.2 Low	100.0%

Events Overview

Category (Events)



A Severe (0) **A** High (0) ▲ Significant (0) A Moderate (0)

\rm Low (0)



Renewable Power Production Spain MCE:GRE

Events Overview

Identify events that may negatively impact stakeholders, the environment, or the company's operations.

Category (Events)

M None (16)

Access to Basic Services

Anti-Competitive Practices

Business Ethics

Data Privacy and Security

Labour Relations

Lobbying and Public Policy

Occupational Health and Safety

Sanctions

Accounting and Taxation

Bribery and Corruption

Community Relations

Intellectual Property

Land Use and Biodiversity

Marketing Practices

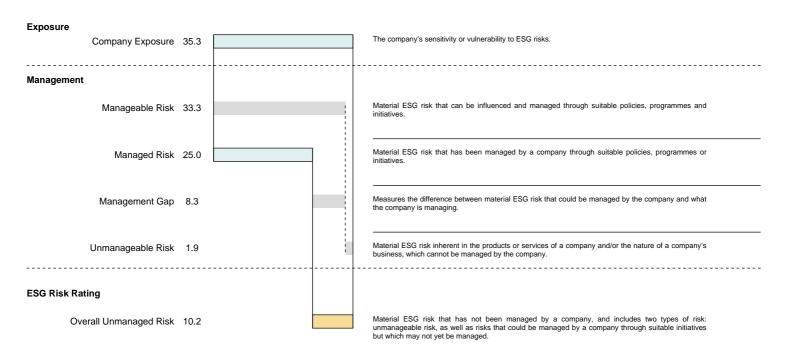
Quality and Safety

Society - Human Rights



Renewable Power Production Spain MCE:GRE

Risk Decomposition



Momentum Details





Renewable Power Production Spain MCE:GRE

Issue

Contribution 35.3 %



Corporate Governance

Corporate Governance represents foundational structures for the management of ESG risks.

ESG Risk Rating





PERCENTILE

26th

47th

27th

ESG Risk Rating Ranking ESG Risk Rating 65% UNIVERSE RANK 57% (1St = lowest risk) (1St = Top Score) 51% 38% 39% **Global Universe** 1281/5009 Utilities 123/264 9% 10% INDUSTRY 3% 2% 1% 0% 0% 09 **Renewable Power 9**/31 Negligible Low Medium High SUBINDUSTRY

Peers Table

Distribution

Peers (Market cap \$0.3 - \$1.1bn)	Exposure	Management	ESG Risk Rating
1. Solarpack Corporación Tecnológica SAU	5.0 Medium	81.0 Strong	1.0 Negligible
2. Grenergy Renovables SA	9.0 High	59.9 Strong	3.6 Low
3. Scatec ASA	9.0 High	55.0 Strong	4.1 Medium
4. Cloudberry Clean Energy ASA	9.0 High	54.5 Strong	4.1 Medium
5. Galata Wind Enerji AS	9.0 High	46.2 Average	4.8 Medium



Renewable Power Production Spain MCE:GRE

ESG Risk Analysis

Exposure refers to the extent to which a company is exposed to different material ESG Issues. The exposure score takes into consideration subindustry and company-specific factors such as its business model.

ESG Risk Exposure



59.9 Strong Low Medium High 0-4 4-8 8+

The quality and integrity of the company's board and management, its ownership structure and shareholder rights are identified as the highest weighted governance areas of focus. The company is publicly traded, which leads to heightened scrutiny of its governance practices and increases the importance of governance structures, practices and behaviour. This translates into high exposure to baseline Corporate Governance risk.

Management refers to how well a company is managing its relevant ESG issues. The management score assesses the robustness of a company's ESG programs, practices, and policies.

ESG Risk Management



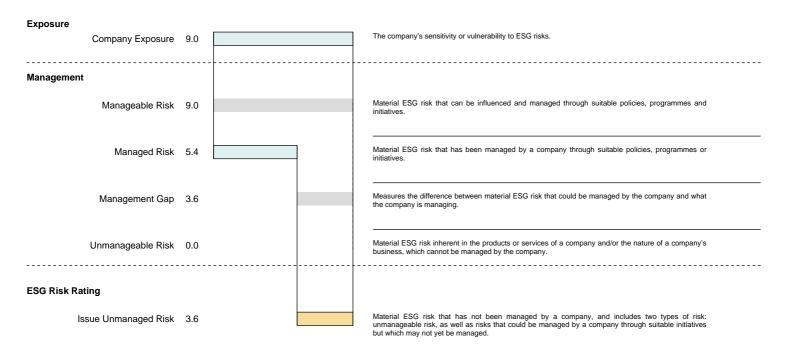
The company is noted for showing particular strength in the quality and integrity of its board/management, its audit and financial performance systems and its stakeholder governance. It has average management of its 3 other governance pillars. Overall, we rate the company's corporate governance management as strong.

Corporate Governance Pillars	Raw Score	Weight	Weighted Score
Board/Management Quality & Integrity	61	25.0%	15.3
Board Structure	66	17.0%	11.2
Ownership & Shareholder Rights	50	25.0%	12.5
Remuneration	54	17.0%	9.2
Audit & Financial Reporting	68	8.0%	5.4
Stakeholder Governance	79	8.0%	6.3
Totals		100.0%	59.9



Renewable Power Production Spain MCE:GRE

Risk Decomposition





Renewable Power Production Spain MCE:GRE

Issue

Contribution 10 6 %

Product Governance

Contribution 19.6 %

Product Governance focuses on how companies manage responsibilities to their clients. Emphasis is put on quality management systems, marketing practices, fair billing and post-sales responsibility.

ESG Risk Rating





ESG Risk Rating Ranking ESG Risk Rating Distribution 58% UNIVERSE RANK PERCENTILE 52% $(1^{St} = lowest risk)$ $(1^{St} = Top Score)$ 37% **Global Universe 1027**/4041 26th 29% 25% 23% 22% 18% 19% Utilities **48**/262 19th 11% INDUSTRY 2% 0% 0% **Renewable Power** 7/31 21st Negligible Low Medium High SUBINDUSTRY

Peers Table

Peers (Market cap \$0.3 - \$1.1bn)	Exposure	Management	ESG Risk Rating
1. Grenergy Renovables SA	5.3 Medium	68.8 Strong	2.0 Low
2. Galata Wind Enerji AS	5.0 Medium	63.3 Strong	2.2 Low
3. Solarpack Corporación Tecnológica SAU	5.3 Medium	60.3 Strong	2.4 Low
4. Scatec ASA	6.3 Medium	50.0 Strong	3.4 Low
5. Cloudberry Clean Energy ASA	5.0 Medium	30.0 Average	3.7 Low



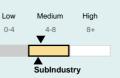
Renewable Power Production Spain MCE:GRE

ESG Risk Analysis

Exposure refers to the extent to which a company is exposed to different material ESG Issues. The exposure score takes into consideration subindustry and company-specific factors such as its business model.

ESG Risk Exposure





Grenergy's business model encompasses all project phases, from development to construction and the financial structuring process, to plant operation and maintenance. As of year-end 2021, the company derived most of its revenue from development and construction activities (89.6%) and from Energy (independent power production and sale – 9.04%). As such, Product Governance risks for the company relate to the quality and safety of the assets it develops and builds, and of the services it offers. Mismanagement in this area may lead to penalties, loss of contracts, and reputational damages.

The company's exposure to Product Governance issues is medium and similar to the subindustry exposure.

Exposure Analysis			Be
Subindustry Issue Exposure		5.0	Ac
Issue Beta	x	1.05	M
Company Issue Exposure		5.3	Da
			Q
			O
			So
			Fi
			As
			He
			Sa
			Q
			Su
			E>
			Тс
			Ва

Beta Indicators	Beta Signal
Access to Basic Services	0.00
Marketing Practices	0.00
Data Privacy and Security	0.00
Quality and Safety	0.00
Operating Performance	-0.02
Solvency	0.03
Financial Flexibility	0.02
Asset Performance	-0.03
Headquarters Location	-0.02
Sales Location	0.05
Qualitative Overlay	0.00
Subindustry Correction Factor	0.00
Exceptional Event Adjustment	0.00
Total Beta Signal	0.05
Baseline	+1.00
Overall Beta	1.05

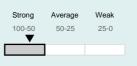


Renewable Power Production Spain MCE:GRE

Management refers to how well a company is managing its relevant ESG issues. The management score assesses the robustness of a company's ESG programs, practices, and policies.

ESG Risk Management





The company reports that its large-scale renewable energy projects are ISO 9001 certified, which standardizes the identification of each project's requirements in terms of quality, safety, and efficiency for each project phase. Furthermore, Grenergy includes climate change risks within operational, technological, environmental, social, and legal risks, specifically the consequences of meteorological risks and natural disasters. To ensure a prompt response in case of environmental emergencies, the company has established a very strong programme that includes training for employees and company-wide guidelines on how to prepare and respond to emergencies.

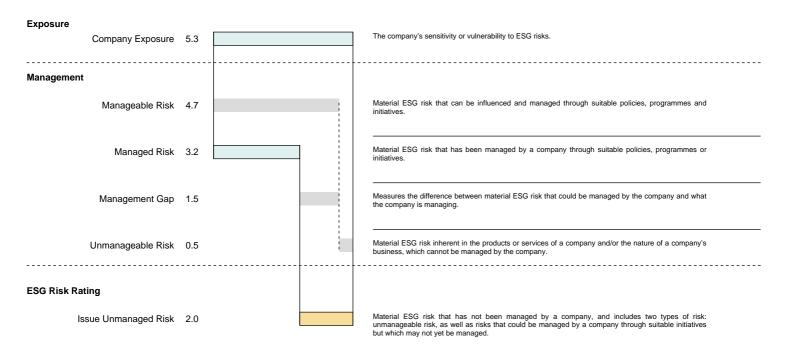
In our view, the company's management of the issue is above average.

Management Indicators	Raw Score	Weight	Weighted Score
Emergency Response Programme	100	25.0%	25.0
Physical Climate Risk Management	100	17.5%	17.5
QMS Certifications	100	7.5%	7.5
Asset Integrity Management	75	25.0%	18.8
Cybersecurity Programme	0	25.0%	0.0
▲ Access to Basic Services	Category 0	0%	0.0
Data Privacy and Security	Category 0	0%	0.0
Marketing Practices	Category 0	0%	0.0
Quality and Safety	Category 0	0%	0.0
Weighted Sum			68.8



Renewable Power Production Spain MCE:GRE

Risk Decomposition





Renewable Power Production Spain MCE:GRE

Issue

Contribution 12.9 %

(Å) **Human Capital**

Human Capital focuses on the management of risks related to scarcity of skilled labour as well as labour

ESG Risk Rating



Negligible Risk



ESG Risk Rating Ranking ESG Risk Rating Distribution 65% UNIVERSE RANK PERCENTILE 59% 58% (1St = lowest risk) (1St = Top Score) 42% 35% **Global Universe 254**/4738 6th 20% 18% Utilities **90**/263 35th INDUSTRY 3% 0% 0% 0% 0% 0% 09 **Renewable Power 6**/31 18th Negligible Low Medium High SUBINDUSTRY

relations, such as non-discrimination, working hours and minimum wages.

Peers Table

Peers (Market cap \$0.3 - \$1.1bn)	Exposure	Management	ESG Risk Rating
1. Solarpack Corporación Tecnológica SAU	3.2 Low	76.2 Strong	0.9 Negligible
2. Grenergy Renovables SA	4.0 Medium	70.6 Strong	1.3 Negligible
3. Scatec ASA	4.4 Medium	58.8 Strong	1.9 Negligible
4. Galata Wind Enerji AS	4.0 Medium	37.5 Average	2.6 Low
5. Cloudberry Clean Energy ASA	3.2 Low	13.1 Weak	2.8 Low



Renewable Power Production Spain MCE:GRE

ESG Risk Analysis

Exposure refers to the extent to which a company is exposed to different material ESG Issues. The exposure score takes into consideration subindustry and company-specific factors such as its business model.





Unlike most of the utilities sector, the renewables industry is burgeoning, with a rapidly increasing workforce. According to the International Renewable Energy Agency (Irena), approximately eight million people worked in the renewable energy business in 2015. Renewables companies also tend to have greater gender diversity than the rest of the industry, with an estimated 35% of women in renewable energy jobs. Within this booming industry, the main challenge for employers is to recruit, onboard and train new talent to enable continued expansion. Additionally, employers that are able to limit employee turnover can avoid repeat training and onboarding expenses.

The company's exposure to Human Capital issues is medium and similar to the subindustry exposure.

Exposure Analysis			Beta Inc
Subindustry Issue Exposure		4.0	Labour R
Issue Beta	x	1.00	Operating
Company Issue Exposure		4.0	Solvency
			Financial
			Asset Pe
			Qualitativ
			Subindus
			Exception
			Total Bet
			Baseline
			Overall B

Beta Indicators	Beta Signal
Labour Relations	0.00
Operating Performance	-0.02
Solvency	0.03
Financial Flexibility	0.02
Asset Performance	-0.03
Qualitative Overlay	0.00
Subindustry Correction Factor	0.00
Exceptional Event Adjustment	0.00
Total Beta Signal	0.00
Baseline	+1.00
Overall Beta	1.00



Renewable Power Production Spain MCE:GRE

Management refers to how well a company is managing its relevant ESG issues. The management score assesses the robustness of a company's ESG programs, practices, and policies.

ESG Risk Management



Strong	Average	Weak	
100-50	50-25	25-0	

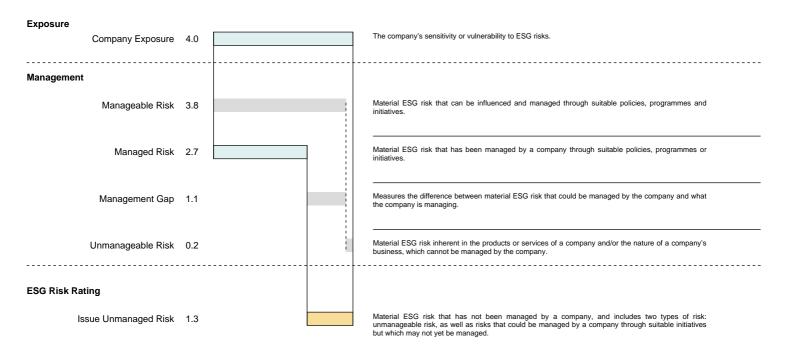
In our view, the company's management of the issue is above average.

Raw Score	Weight	Weighted Score
100	15.0%	15.0
100	17.5%	17.5
75	17.5%	13.1
75	25.0%	18.8
50	12.5%	6.3
0	12.5%	0.0
Category 0	0%	0.0
		70.6
	100 100 75 75 50 0	100 15.0% 100 17.5% 75 17.5% 75 25.0% 50 12.5% 0 12.5%



Renewable Power Production Spain MCE:GRE

Risk Decomposition





Renewable Power Production Spain MCE:GRE

Issue

Contribution 12.7 %

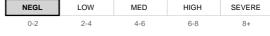
Occupational Health and Safety

Occupational Health and Safety focuses on the management of workplace hazards affecting a company's own employees and on-site contractors. Where relevant, it may also include HIV/AIDS programmes.

ESG Risk Rating



Negligible Risk



ESG Risk Rating Ranking ESG Risk Rating Distribution 58% UNIVERSE RANK PERCENTILE 51% $(1^{St} = lowest risk)$ $(1^{St} = Top Score)$ 42% 43% 42% 38% **Global Universe 431**/2132 21st Utilities 12% 10% 49/261 19th INDUSTRY 2% 0% 0% 0% 09 **Renewable Power 11**/31 34th Negligible Low Medium High SUBINDUSTRY

Peers Table

Peers (Market cap \$0.3 - \$1.1bn)	Exposure	Management	ESG Risk Rating
1. Solarpack Corporación Tecnológica SAU	4.0 Medium	87.8 Strong	0.8 Negligible
2. Grenergy Renovables SA	4.0 Medium	75.0 Strong	1.3 Negligible
3. Scatec ASA	4.4 Medium	70.5 Strong	1.6 Negligible
4. Galata Wind Enerji AS	4.0 Medium	56.5 Strong	2.0 Negligible
5. Cloudberry Clean Energy ASA	4.0 Medium	22.5 Weak	3.2 Low



Data Cignal

Grenergy Renovables SA

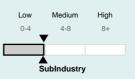
Renewable Power Production Spain MCE:GRE

ESG Risk Analysis

Exposure refers to the extent to which a company is exposed to different material ESG Issues. The exposure score takes into consideration subindustry and company-specific factors such as its business model.

ESG Risk Exposure





Grenergy had 245 employees at year-end 2021, out of which 88% have permanent contracts. Such employees perform tasks in potentially hazardous conditions, including working on highaltitude wind turbine generators or in remote areas and hot temperatures. Thus, weak health and safety programmes could lead to a high rate of workplace injuries or fatalities which could, in turn, trigger fines and compensation costs.

The company's exposure to Occupational Health and Safety issues is medium and similar to the subindustry exposure.

Exposure Analysis Beta Indicators Subindustry Issue Exposure 4.0 Occupational Heal Issue Beta x 1.00 Operating Perform Company Issue Exposure 4.0 Solvency Financial Flexibility Asset Performance Headquarters Local Assets Location Qualitative Overlay Subindustry Correct Total Beta Signal Baseline Baseline

Beta	Indicators	Beta Signal
Occu	upational Health and Safety	y 0.00
Ope	rating Performance	-0.02
Solv	ency	0.03
Fina	ncial Flexibility	0.02
Asse	et Performance	-0.03
Hea	dquarters Location	-0.02
Asse	ets Location	0.00
Qua	litative Overlay	0.00
Subi	ndustry Correction Factor	0.00
Exce	eptional Event Adjustment	0.00
Tota	l Beta Signal	0.00
Base	eline	+1.00
Ove	rall Beta	1.00



Renewable Power Production Spain MCE:GRE

Management refers to how well a company is managing its relevant ESG issues. The management score assesses the robustness of a company's ESG programs, practices, and policies.

ESG Risk Management





In its Sustainability Report 2021, Grenergy discloses that it provided 781 hours of health and safety training for employees, to raise awareness of the risks to which they may be exposed on the job and what to do in the event of an emergency. As a result of measures taken in this sense, in 2021 the company did not record any occupational illnesses or employee accidents. Moreover, Grenergy reports that no subcontractor employees sustained serious injuries while performing activities for the company in 2021, and there were no contractor or employee fatalities reported in the last three years.

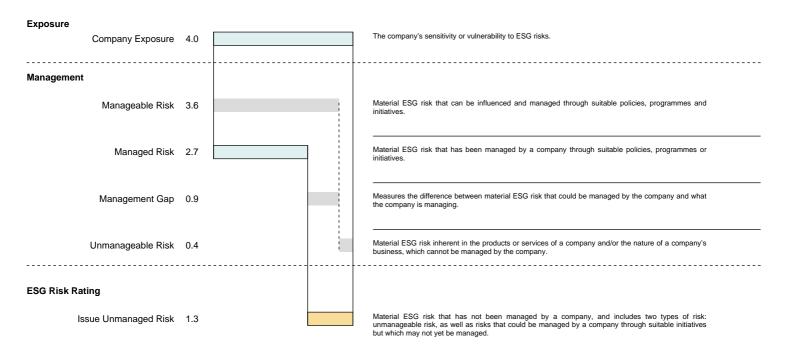
In our view, the company's management of the issue is above average.

Management Indicators	Raw Score	Weight	Weighted Score
Contractor Fatalities	100	15.0%	15.0
Employee Fatality Rate	100	12.5%	12.5
LTIR Trend	100	17.5%	17.5
Contractor Safety Programme	75	15.0%	11.3
Health and Safety Management	75	25.0%	18.8
Health & Safety Certifications	0	15.0%	0.0
Occupational Health and Safety	Category 0	0%	0.0
Weighted Sum			75.0



Renewable Power Production Spain MCE:GRE

Risk Decomposition





Renewable Power Production Spain MCE:GRE

Issue

Contribution 11.2 %

Community Relations

Community Relations focuses on how companies engage with local communities (including indigenous peoples) through both positive initiatives and mitigation of negative impacts.

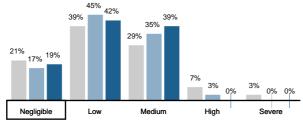
ESG Risk Rating



Negligible Risk



ESG Risk Rating Distribution



ESG Risk Rating Ranking

UNIVERSE	RANK F (1 St = lowest risk)	PERCENTILE (1 st = Top Score)
Global Universe	33 /931	4th
Utilities INDUSTRY	9 /260	4th
Renewable Power	2 /31	4th
SUBINDUSTRY		

Peers Table

Peers (Market cap \$0.3 - \$1.1bn)	Exposure	Management	ESG Risk Rating
1. Grenergy Renovables SA	6.0 Medium	90.0 Strong	1.1 Negligible
2. Solarpack Corporación Tecnológica SAU	6.3 Medium	87.5 Strong	1.3 Negligible
3. Scatec ASA	6.6 Medium	87.5 Strong	1.4 Negligible
4. Galata Wind Enerji AS	6.0 Medium	25.0 Average	4.7 Medium
5. Cloudberry Clean Energy ASA	6.3 Medium	20.0 Weak	5.2 Medium



Renewable Power Production Spain MCE:GRE

ESG Risk Analysis

Exposure refers to the extent to which a company is exposed to different material ESG Issues. The exposure score takes into consideration subindustry and company-specific factors such as its business model.

ESG Risk Exposure





As part of its business strategy, Grenergy aims to operate 3.5 GW of installed generation capacity by 2024 for photovoltaic as well as wind farms located in Spain, Chile, Mexico, Peru, Colombia and Argentina. As the development of such assets typically requires the acquisition and development of large tracts of land, local communities may be impacted and protest against new projects. Mismanagement of community relations could result in project delays, difficulties in obtaining permits and negative publicity for the company.

The company's exposure to Community Relations issues is medium and similar to the subindustry exposure.

Exposure Analysis

Subindustry Issue Exposure		6.0	
Issue Beta	x	1.00	
Company Issue Exposure		6.0	-
			-
			_
			-

Beta Indicators	Beta Signal
Community Relations	0.00
Society - Human Rights	0.00
Operating Performance	-0.02
Solvency	0.03
Financial Flexibility	0.02
Asset Performance	-0.03
Qualitative Overlay	0.00
Subindustry Correction Factor	0.00
Exceptional Event Adjustment	0.00
Total Beta Signal	0.00
Baseline	+1.00
Overall Beta	1.00



Renewable Power Production Spain MCE:GRE

Management refers to how well a company is managing its relevant ESG issues. The management score assesses the robustness of a company's ESG programs, practices, and policies.

ESG Risk Management



Strong	Average	Weak
100-50	50-25	25-0

Grenergy discloses a very strong community involvement programme that includes most elements of best practice: a formal commitment to consult with local communities, executive responsibility for related matters, ongoing consultation and an accessible mechanism for community members to submit complaints or grievances. To ensure projects have a solid kick-off, Grenergy organizes meetings with local communities in the development phase. The company has also taken some initiatives to support the development of the communities located in the proximity of its assets, such as funding educational and cultural initiatives in the communities with which it engages.

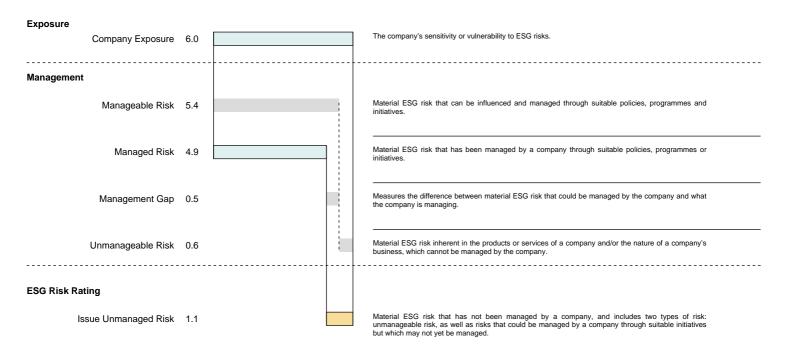
In our view, the company's management of the issue is above average.

Management Indicators	Raw Score	Weight	Weighted Score
Access to Basic Services	100	20.0%	20.0
Community Involvement Programmes	100	40.0%	40.0
Community Development	75	40.0%	30.0
Community Relations	Category 0	0%	0.0
Society - Human Rights	Category 0	0%	0.0
Weighted Sum			90.0



Renewable Power Production Spain MCE:GRE

Risk Decomposition





Renewable Power Production Spain MCE:GRE

Issue

Contribution 7.5 %

Business Ethics

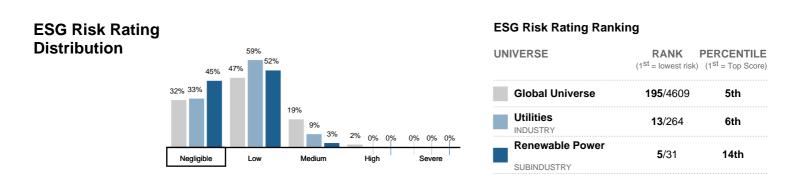
Business Ethics focuses on the management of ethical considerations applicable to most or all sectors, such as taxation and accounting, anti-competitive practices and intellectual property issues.

ESG Risk Rating



Negligible Risk





Peers Table

Peers (Market cap \$0.3 - \$1.1bn)	Exposure	Management	ESG Risk Rating
1. Solarpack Corporación Tecnológica SAU	4.2 Medium	87.5 Strong	0.7 Negligible
2. Grenergy Renovables SA	4.0 Medium	85.0 Strong	0.8 Negligible
3. Scatec ASA	4.4 Medium	72.5 Strong	1.4 Negligible
4. Galata Wind Enerji AS	4.0 Medium	32.5 Average	2.8 Low
5. Cloudberry Clean Energy ASA	4.2 Medium	35.0 Average	2.8 Low

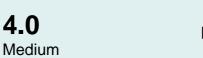


Renewable Power Production Spain MCE:GRE

ESG Risk Analysis

Exposure refers to the extent to which a company is exposed to different material ESG Issues. The exposure score takes into consideration subindustry and company-specific factors such as its business model.







Renewables producers have close relationships with government officials, as well as relationships with suppliers, third-party contractors and utility customers. Any one of these relationships can be exploited by employees for financial gain. The utilities sector generally has historically experienced a range of incidents related to ethical misconduct, including procurement fraud (e.g. bid rigging, false invoices or collusion with vendors) and bribery. There is a growing global trend toward tougher national anti-corruption laws, as well as new procurement rules in the EU in April 2016; however, the impacts on these laws on businesses will depend on detection and enforcement. As renewable energy becomes mainstream and lower cost, government subsidies and grants may be withdrawn, which could raise the incentive to lobby or bribe government officials to extend these incentives longer to maintain/increase profitability. The IEA estimates that more than USD 100 billion in subsidies for renewable energy was available worldwide in 2014. Company exposure to Business Ethics issues depends greatly on the regulatory environment where the utility operates. Utilities operating in regions that score poorly on the Corruption Perceptions Index may be more exposed to bribery and procurement fraud, for example. Companies in developed markets such as the EU or US, however, may be more exposed to lawsuits and investigations related to renewables subsidies. Best practice for utilities includes strong anti-corruption policies and whistleblower programmes, as well as due diligence on third-party transactions.

The company's exposure to Business Ethics issues is medium and similar to the subindustry exposure.

Exposure Analysis				Beta Indicators	Beta Signal
Subindustry Issue Exposure		4.0		Accounting and Taxation	0.00
Issue Beta	х	1.00		Anti-Competitive Practices	0.00
Company Issue Exposure		4.0	_	Bribery and Corruption	0.00
				Business Ethics	0.00
				Intellectual Property	0.00
				Lobbying and Public Policy	0.00
				Sanctions	0.00
				Operating Performance	-0.02
				Solvency	0.03
				Financial Flexibility	0.02
				Asset Performance	-0.03
				Qualitative Overlay	0.00
				Subindustry Correction Factor	0.00
				Exceptional Event Adjustment	0.00



Renewable Power Production Spain MCE:GRE

ESG Risk Analysis

Exposure refers to the extent to which a company is exposed to different material ESG Issues. Our exposure score takes into consideration subindustry and company-specific factors such as its business model.

Beta Indicators	Beta Signal
Total Beta Signal	0.00
Baseline	+1.00
Overall Beta	1.00



Renewable Power Production Spain MCE:GRE

Management refers to how well a company is managing its relevant ESG issues. The management score assesses the robustness of a company's ESG programs, practices, and policies.

ESG Risk Management



Strong	Average	Weak
100-50	50-25	25-0

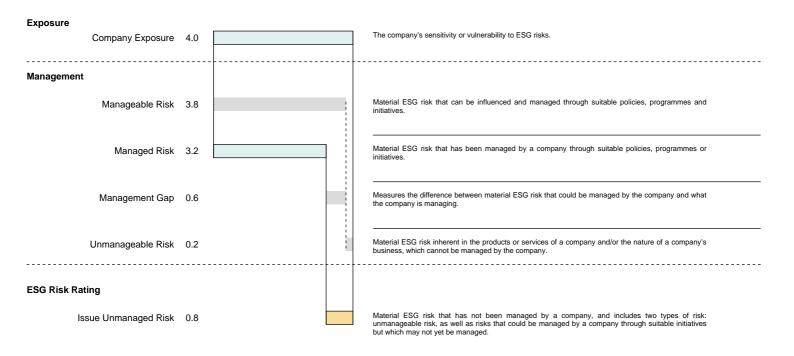
In our view, the company's management of the issue is above average.

Management Indicators	Raw Score	Weight	Weighted Score
Bribery & Corruption Policy	100	10.0%	10.0
Lobbying and Political Expenses	100	5.0%	5.0
Whistleblower Programmes	100	25.0%	25.0
Bribery & Corruption Programmes	75	25.0%	18.8
Business Ethics Programme	75	25.0%	18.8
Political Involvement Policy	75	10.0%	7.5
Accounting and Taxation	Category 0	0%	0.0
Anti-Competitive Practices	Category 0	0%	0.0
Bribery and Corruption	Category 0	0%	0.0
Business Ethics	Category 0	0%	0.0
Intellectual Property	Category 0	0%	0.0
▲ Lobbying and Public Policy	Category 0	0%	0.0
▲ Sanctions	Category 0	0%	0.0
Weighted Sum			85.0



Renewable Power Production Spain MCE:GRE

Risk Decomposition





Renewable Power Production Spain MCE:GRE

Issue

Contribution 0.9 %

9-20

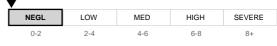
Land Use and Biodiversity

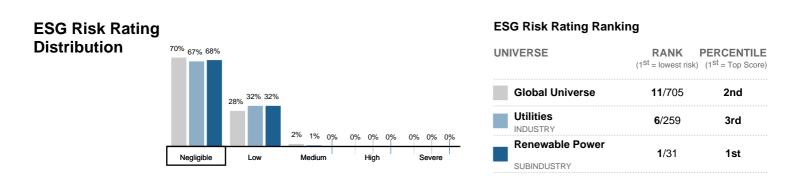
Land Use and Biodiversity focuses on how companies' manage their impact on land, ecosystems and wildlife. Topics include land conversion, land rehabilitation and forest management.

ESG Risk Rating



Negligible Risk





Peers Table

Peers (Market cap \$0.3 - \$1.1bn)	Exposure	Management	ESG Risk Rating
1. Grenergy Renovables SA	3.0 Low	97.1 Strong	0.1 Negligible
2. Solarpack Corporación Tecnológica SAU	3.0 Low	80.9 Strong	0.6 Negligible
3. Galata Wind Enerji AS	3.0 Low	67.6 Strong	1.0 Negligible
4. Scatec ASA	4.2 Medium	76.5 Strong	1.0 Negligible
5. Cloudberry Clean Energy ASA	3.0 Low	41.8 Average	1.7 Negligible



Renewable Power Production Spain MCE:GRE

ESG Risk Analysis

Exposure refers to the extent to which a company is exposed to different material ESG Issues. The exposure score takes into consideration subindustry and company-specific factors such as its business model.





Renewables producers' infrastructure projects, such as hydroelectric dams, wind and solar farms, affect large tracts of land and critical bodies of water, and may have negative impacts through habitat fragmentation and ecosystem disruption. Because renewables mostly depend on natural forces (sun, wind and water) for energy production, promising locations for facilities are often in protected land areas. In developed markets in particular, companies are required to comply with conservation laws protecting natural habitats. Permitting for large projects is a lengthy process that requires environmental impact assessments, and project designs that are assessed as having potentially harmful impacts on aquatic, forest or other natural ecosystems may be delayed or even denied, particularly in ecologically sensitive areas. Additionally, disruption of natural environments without sufficient mitigation measures may raise community tensions as well as scrutiny from NGOs and regulators. However, regulatory penalties on biodiversity mismanagement may be weak or unenforced in some regions, particularly in emerging markets. Best practice within the industry comprises publishing a biodiversity statement and reporting on specific programmes, as well as cooperating with environmental agencies, stakeholders and expert organizations such as the International Union for Conservation of Nature or the Wildlife Habitat Council.

The company's exposure to Land Use and Biodiversity issues is low and similar to the subindustry exposure.

Exposure Analysis			
Subindustry Issue Exposure		3.0	
Issue Beta	x	1.00	
Company Issue Exposure		3.0	

Exposure Analysis

Beta Indicators	Beta Signal
Land Use and Biodiversity	0.00
Operating Performance	-0.02
Solvency	0.03
Financial Flexibility	0.02
Asset Performance	-0.03
Headquarters Location	-0.02
Assets Location	0.00
Qualitative Overlay	0.00
Subindustry Correction Factor	0.00
Exceptional Event Adjustment	0.00
Total Beta Signal	0.00
Baseline	+1.00
Overall Beta	1.00



Renewable Power Production Spain MCE:GRE

Management refers to how well a company is managing its relevant ESG issues. The management score assesses the robustness of a company's ESG programs, practices, and policies.

ESG Risk Management 97.1 Strong

In our view, the company's management of the issue is above average.

Management Indicators	Raw Score	Weight	Weighted Score
Biodiversity Programmes	100	47.1%	47.1
EMS Certification	100	5.9%	5.9
Environmental Management System	100	35.3%	35.3
Environmental Policy	75	11.8%	8.8
▲ Land Use and Biodiversity	Category 0	0%	0.0
Weighted Sum			97.1



Renewable Power Production Spain MCE:GRE

Risk Decomposition

Exposure		
Company Exposure	3.0	The company's sensitivity or vulnerability to ESG risks.
Management		
Manageable Risk	3.0	Material ESG risk that can be influenced and managed through suitable policies, programmes and initiatives.
Managed Risk	2.9	Material ESG risk that has been managed by a company through suitable policies, programmes or initiatives.
Management Gap	0.1	Measures the difference between material ESG risk that could be managed by the company and what the company is managing.
Unmanageable Risk	0.0	 Material ESG risk inherent in the products or services of a company and/or the nature of a company's business, which cannot be managed by the company.
ESG Risk Rating		
Issue Unmanaged Risk	0.1	Material ESG risk that has not been managed by a company, and includes two types of risk: unmanageable risk, as well as risks that could be managed by a company through suitable initiatives but which may not yet be managed.



Appendix

Management Details



Board/Management Quality & Integrity

61 Outperformer

Raw Score

Our analysis of the quality and integrity of the company's board and management indicates the following key areas of focus for Grenergy Renovables SA:

The company has not received significant (>30%) votes against company recommendations/ nominees in the two most recent AGMs and the company discloses a shareholder engagement policy.
No directors are linked to governance controversies at other companies and no

• No directors are linked to governance controversies at other companies and no directors are linked to performance failures at other companies.

One or more non-executive directors have relevant industry experience as a public or private company executive and one or more non-executive directors have relevant industry experience as a public company outside director.

relevant industry experience as a public company outside director. Overall, Grenergy Renovables SA positions itself as an Outperformer with regard to its Board/Management Quality & Integrity compared to peers.

Board Structure

66 Average Performer

Raw Score

In reviewing the company's structural board features, we note the following for Grenergy Renovables SA:

• The Chair and CEO roles are combined and the Chair is the founder or founder's family (or affiliates).

• The board lacks an independent majority and the company has a controlling shareholder.

• Some directors are nominated by significant/strategic shareholders and all directors are elected by all shareholders.

Overall, Grenergy Renovables SA positions itself as an Average Performer with regard to its Board Structure compared to peers.

Ownership & Shareholder Rights

50 Average Performer

Raw Score

Grenergy Renovables SA's Ownership & Shareholder rights regime includes the following key areas of focus:

• The company has a controlling shareholder and charter/bylaw amendments require a simple majority vote.

• Not all the directors on the board are elected annually.

• There is a controlling shareholder with 50% or more of voting rights and the dominant shareholder is the company founder or founder's family (or affiliates). Overall, Grenergy Renovables SA positions itself as an Average Performer with regard to its Ownership & Shareholder Rights compared to peers.

Indicators	Score
Board Experience	70
Governance Controversies	50
Shareholder Engagement and Responsiveness	100
Director Track Record	80
Board Capture	60
Related Party Transactions	20
Director Stock Ownership	60
Executive/Board Misconduct	50
Business Practices Controversies	50

Indicators	Score
Board Leadership	20
Board Tenure	80
Board Independence	30
Nominating Committee Effectiveness	40
Director Disclosure	100
Voting Structures	100
Directors not Elected by Shareholders	30
Risk Oversight	100
Board Diversity	90

Indicators	Score
Director Appointment & Removal	30
Proportionality - One Share/One Vote	60
Ownership Structure	50
Capital Issuance Risks	60
Shareholder Action	60
Poison Pill & Takeover Defences	80
Supermajority Provisions	0



Gropor		wahloe	c۸
Grener	gy Rend	ovables	SA







 $\cap \cap \cap$

Appendix

Management Details -

Remuneration

54 Average Performer

Raw Score

Our analysis of executive compensation practices at Grenergy Renovables SA points to the following:

• The remuneration committee has an independent majority but includes nonindependent members and a representative of the controlling shareholder is on the remuneration committee.

C

Ś

 The company measures long-term performance for LTI on a period of three years or more and the company offers more than half of the LTI in performancebased equity awards.

 The formula used to calculate STI payout is disclosed and actual STI payouts are disclosed.

Overall, Grenergy Renovables SA positions itself as an Average Performer with regard to its Remuneration compared to peers.

Indicators	Score
Remuneration Disclosure	80
CEO Termination Scenarios	80
Internal Pay Equity	50
Clawback Policy	70
Remuneration Committee Effectiveness	20
Say on Pay	70
Pay Controversies	50
STI Performance Metrics	40
LTI Performance Metrics	80
Pay Magnitude	40
Pay for Performance	20
Pay for Failure	60

Grenergy Renovables SA

Audit & Financial Reporting

68 Outperformer

Raw Score

In reviewing the company's Audit & Financial reporting features, we note the following for Grenergy Renovables SA:

• Non-audit fees paid to the auditor are de minimis relative to audit and auditrelated fees.

• The audit committee met 6 or more times during the year and there is at least one independent member of the audit committee with financial expertise.

• The company has a policy to rotate or re-tender the audit mandate and there is a market requirement to periodically re-tender or rotate the audit mandate. Overall, Grenergy Renovables SA positions itself as an Outperformer with regard to its Audit & Financial Reporting compared to peers.

Stakeholder Governance

79 Leader

Raw Score

In reviewing the company's practices regarding ESG stakeholder governance, points of attention for Grenergy Renovables SA are: ESG Governance, Bribery & Corruption Policy and Whistleblower Programmes.

• ESG Governance: A board member or a board committee is responsible for overseeing ESG issues

Bribery & Corruption Policy: The company has a very strong policy

Whistleblower Programmes: The company has a very strong programme

Indicators	Score
Audit Committee Structure	40
Audit Committee Effectiveness	90
Auditor Fees	100
Audit Rotation Policy	70
Auditor Change	50
Reporting Irregularities	50

Indicators	Score
ESG Governance	100
Environmental Policy	75
Whistleblower Programmes	100
Tax Disclosure	100
Discrimination Policy	100
Scope of Social Supplier Standards	75
GHG Reduction Programme	50
Green Procurement Policy	60
ESG Reporting Standards	75
Verification of ESG Reporting	0
Global Compact Signatory	100
ESG Performance Targets	25
Political Involvement Policy	75
Lobbying and Political Expenses	100
Bribery & Corruption Policy	100



Appendix	
Exposure Details	
Product Governance	
EA.E.1 - Access to Basic Services	EA.E.24 - Marketing Practices
0.00 Beta Signal	0.00 Beta Signal
No evidence of relevant controversies	No evidence of relevant controversies
EA.E.27 - Data Privacy and Security	EA.E.28 - Quality and Safety
0.00 Beta Signal	0.00 Beta Signal
No evidence of relevant controversies	No evidence of relevant controversies
EA.F.1 - Operating Performance	EA.F.2 - Solvency
- 0.02 Beta Signal	0.03 Beta Signal
The company has a strong net income margin.	The company has a very weak debt-equity ratio.
Average Net Income Margin (Trailing 3 Years): 24.39% Subindustry Median (Trailing 3 Years): 13.37% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.	Average Debt to Equity Ratio (3 Period Exponentially Weighted Average as of December 2021): 2.43 Subindustry Median (3 Period Exponentially Weighted Average as of December 2021): 1.47 Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.
EA.F.3 - Financial Flexibility	EA.F.4 - Asset Performance
0.02 Reta Signal	- 0.03 Rate Signal
Beta Signal The company has a weak cash flow ratio.	Beta Signal The company has a very strong return on assets.
Average Free Cash Flow Ratio (Trailing 3 Years): -75.99% Subindustry Median (Trailing 3 Years): 3.06% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.	Average Return on Assets (Trailing 3 Years): 11.43% Subindustry Median (Trailing 3 Years): 2.35% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.



.....

Exposure Details

EA.G.1 - Headquarters Location	
0.02	0.05
Beta Signal	Beta Signal
The location of the company's headquarters indicates slightly lower exposure to this issue.	The location of the company's sales indicates slightly higher exposure to this issue.
Spain: Slightly lower exposure Source: Sustainalytics Country Risk Rating, December 2021.	Spain: 46% (Slightly higher exposure) Chile: 45% (Slightly higher exposure)
	Other: 10%
	Source: Sustainalytics Country Risk Rating, December 2021. Morningstar, December 2021. All Rights Reserved.
EA.S.1 - Qualitative Overlay	EA.S.2 - Subindustry Correction Factor
0.00	0.00
Beta Signal	Beta Signal
Answer category for neutral beta signal adjustment	

EA.S.3 - Exceptional Event Adjustment

0.00 Beta Signal

.....



Management Details

E.1.3.1 - Emergency Response Programme

100	25.00%	25.0
Raw Score	Weight	Weighted Score
	The company has a very	strong programme
Criteria		
Company-wid	e guidelines on how to pre	epare for and respond to emergencies
· · · ·	aining for employees or co ency response plans	ommunities, including regular testing
ldentification	of potential risks requiring	emergency response
Managerial re investigation	sponsibility for emergency	r preparedness, response and
Mechanisms	for stakeholders to report e	emergencies
Policy commi	ment to prepare for and re	espond to emergencies
Protocols for	communicating with extern	nal stakeholders
<u> </u>		

Regional, site or unit level emergency response teams in place

Sources

Prior to research start date, the company sent documents on 22 January 2021

The company provided feedback on 06 September 2022

The company provided feedback on 13 September 2022

.....

E.1.6.2 - Physical Climate Risk Management

100	17.50%	17.5
Raw Score	Weight	Weighted Score

The company has a strong programme

Criteria

- Detailed reporting on physical climate change risk drivers
- Initiatives to manage or adapt to physical climate change risks
- Integration of physical climate change into regular risk assessments and business strategy
- Managerial or board level responsibility for climate change risks
- Recognition of the physical risks related to climate change

Sources

Grenergy Renovables SA Sustainability Report 2021 (FY2021) The company provided feedback on 10 February 2021

S.3.1.3.3 - Cybersecurity Programme

0	25.00%	0.0
Raw Score	Weight	Weighted Score

Based on available evidence, the company does not have a programme

Criteria

- Governance structures in place for cybersecurity management
- Management system certified to ISO 27001 standards
- Operational measures to monitor and respond to data breaches and cyberattacks
- Regular employee training on cybersecurity issues
- Regular external security audits or vulnerability assessments of the company's systems, products and practices affecting user data
- Regular internal security audits or vulnerability assessments or penetration testing of the company's systems, products and practices affecting user data

S.3.1.17 - Asset Integrity Management

75	25.00%	18.8
Raw Score	Weight	Weighted Score

The company has a strong programme

Criteria

- Awareness and training
- Continual improvement
- Disclosure of specific asset management objectives and targets
- Formal asset management plan established
- Formal asset management policy
- Managerial responsibility
- Monitoring and measuring performance
- Preventative and corrective actions
- Regular internal or external audits
- Risk identification and mitigation disclosure
- The company has a certified asset management programme that is applied to less than 50% of its operations

Sources

The company provided feedback on 10 February 2021

- The company provided feedback on 13 September 2022
- The company provided feedback on 15 September 2022



爵

Management Details ____

S.3.2.1 - QMS Certifications

100	7.50%	7.5	
Raw Score	Weight	Weighted Score	
90% or more of the company's sites has received external certification			

Sources

Prior to research start date, the company sent documents on 22 January 2021



Annendix

A.F.1 - Operating Performance
D.02 eta Signal
The company has a strong net income margin.
verage Net Income Margin (Trailing 3 Years): 24.39% ubindustry Median (Trailing 3 Years): 13.37% purce: Morningstar, December 2021. All Rights Reserved., cctSet, December 2021. All Rights Reserved.
A.F.3 - Financial Flexibility
.02
ota Signal
The company has a weak cash flow ratio.
verage Free Cash Flow Ratio (Trailing 3 Years): -75.99% ubindustry Median (Trailing 3 Years): 3.06% purce: Morningstar, December 2021. All Rights Reserved., actSet, December 2021. All Rights Reserved.

EA.F.4 - Asset Performance

- 0.03

Beta Signal

The company has a very strong return on assets.

Average Return on Assets (Trailing 3 Years): 11.43% Subindustry Median (Trailing 3 Years): 2.35% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.

EA.S.1 - Qualitative Overlay

0.00

Beta Signal

Answer category for neutral beta signal adjustment



0.00

Beta Signal

Exposure Details

EA.S.2 - Subindustry Correction Factor

EA.S.3 - Exceptional Event Adjustment

0.00 Beta Signal



Æ

Management Details

S.1.1 - Freedom of Association Policy

100	17.50%	17.5	
Raw Score	Weight	Weighted Score	
The con	npany has a strong policy	on freedom of association	

Sources

Grenergy Renovables SA Code of Business Ethics, released May 2018 Grenergy Renovables SA Human Rights Policy, released January 2021

S.1.2 - Discrimination Policy

100	15.00%	15.0
Raw Score	Weight	Weighted Score
	The company has a	strong policy

Criteria

- Commitment to ensure equal opportunity
- ✓ List of the types of discrimination the company is committed to eliminate
- Reference to the ILO conventions

Sources

Grenergy Renovables SA Code of Business Ethics, released May 2018 Grenergy Renovables SA Human Rights Policy, released January 2021 The company provided feedback on 10 February 2021

S.1.3 - Diversity Programmes

75	17.50%	13.1
Raw Score	Weight	Weighted Score

The company has a strong programme

Criteria

- Diversity monitoring or audits
- Employee affinity groups, diversity councils, or networking groups
- Initiatives supporting a diverse workforce
- Initiatives to recruit from diverse talent
- Managerial or board level responsibility for diversity initiatives
- Mentorship programmes
- The company has a programme that applies to less than 50% of operations
- Training and guidance regarding diversity

Sources

Grenergy Renovables SA Sustainability Report 2021 (FY2021)

The company provided feedback on 13 September 2022

S.1.4 - Collective Bargaining Agreements

50	12.50%	6.3
Raw Score	Weight	Weighted Score

25-50% of the company's employees are covered by collective bargaining agreements

Sources

Grenergy Renovables SA Sustainability Report 2021 (FY2021) The company provided feedback on 10 February 2021

S.1.5 - Employee Turnover Rate

0	12.50%	0.0		
Raw Score	Weight	Weighted Score	I	
The company's employee turnover rate is high				
Sources				
Grenergy Renovables SA Sustainability Report 2021 (FY2021)				
The company provided feedback on 18 February 2020			(

S.1.5.2 - Human Capital Development

75	25.00%	18.8
Raw Score	Weight	Weighted Score
TI	he company has a s	strong programme
Criteria		
Formal mechanism	ns to promote an op	en feedback culture
 Initiatives for talent development 		
Initiatives for talent	recruitment	
Initiatives for talent	retention	

- Quantitative targets related to human capital development
- Regular formal performance reviews for all permanent employees aligned with career development



梁

Management Details -

Reporting on human capital development metrics

Reporting on human capital risk assessment

Sources

Grenergy Renovables SA Sustainability Report 2021 (FY2021) The company provided feedback on 06 September 2022 The company provided feedback on 12 February 2021 The company provided feedback on 18 February 2020

.....



(ā))



Occupational Health and Safety

EA.E.20 - Occupational Health and Safety

0.00 Beta Signal

No evidence of relevant controversies

EA.F.1 - Operating Performance

- 0.02

Beta Signal

The company has a strong net income margin.

Average Net Income Margin (Trailing 3 Years): 24.39% Subindustry Median (Trailing 3 Years): 13.37% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.

EA.F.2 - Solvency

0.03 Beta Signal

The company has a very weak debt-equity ratio.

Average Debt to Equity Ratio (3 Period Exponentially Weighted Average as of December 2021): 2.43 $\,$

Subindustry Median (3 Period Exponentially Weighted Average as of December 2021): 1.47

Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.

EA.F.3 - Financial Flexibility

0.02 Beta Signal

Beta Signal

The company has a weak cash flow ratio.

Average Free Cash Flow Ratio (Trailing 3 Years): -75.99% Subindustry Median (Trailing 3 Years): 3.06% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.

EA.F.4 - Asset Performance

- 0.03

Beta Signal

The company has a very strong return on assets.

Average Return on Assets (Trailing 3 Years): 11.43% Subindustry Median (Trailing 3 Years): 2.35% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.

EA.G.1 - Headquarters Location

```
Beta Signal
```

The location of the company's headquarters indicates slightly lower exposure to this issue.

Spain: Slightly lower exposure Source: Sustainalytics Country Risk Rating, December 2021.



^{- 0.02}

Exposure Details

EA.G.2 - Assets Location EA.S.1 - Qualitative Overlay 0.00 0.00 Beta Signal Beta Signal The location of the company's assets does not signal higher or lower exposure to Answer category for neutral beta signal adjustment this issue. Chile: 44% (Slightly lower exposure) Argentina: 17% (Average exposure) Peru: 16% (Average exposure) Spain: 13% (Slightly lower exposure) Other: 10% Source: Sustainalytics Country Risk Rating, December 2021." Morningstar, December 2021. All Rights Reserved. EA.S.2 - Subindustry Correction Factor EA.S.3 - Exceptional Event Adjustment 0.00 0.00 Beta Signal Beta Signal



SUSTAINALYTICS ESG RISK RATING REPORT

Appendix

Management Details -

S.1.6.2.1 - Health and Safety Management System

75		25.00%	18.8	0
Raw S	core	Weight	Weighted Score	Ra
	The comp	any has a strong r	nanagement system	Ba
Criteri	а			
🖌 Ei	mergency preparedr	ess procedures		
✓ For	ormal health and saf	ety policy commitn	nent	
<u> </u>	ternal or external he ears	alth and safety aud	dits conducted at least every three	
🖌 M	anagerial responsibi	lity for health and	safety issues	
o	perating guidelines of	or procedures that	are relevant for the industry	
✓ Pe	erformance monitori	ng and measureme	ent	
PI	rocedures for hazard	l identification and	risk assessment	
🖌 R	egular health and sa	fety training progra	ammes for employees	
🖌 R	eporting on health a	nd safety program	mes and performance	
Та	argets to reduce hea	Ith and safety incid	dents	
Source	es			
Grener	rgy Renovables SA (Code of Business I	Ethics, released May 2018	
Grener	rgy Renovables SA S	Sustainability Repo	ort 2021 (FY2021)	
The co	mnany provided fee	dback on 10 Febru	Jany 2021	

The company provided feedback on 10 February 2021

The company provided feedback on 12 February 2021

The company provided feedback on 13 September 2022

.....

S.1.6.5 - LTIR Trend

Raw Score	Weight	Weighted Score
100	17.50%	17.5

The company's lost-time incident rate has declined

Sources

Grenergy Renovables SA Corporate Social Responsibility Report 2020 (FY2020) Grenergy Renovables SA Sustainability Report 2021 (FY2021)

S.1.6.4 - Health & Safety Certifications

0	15.00%	0.0
Raw Score	Weight	Weighted Score

Based on available evidence, the company's facilities have not received external certification

S.1.6.6 - Employee Fatality Rate

100	12.50%	12.5
Raw Score	Weight	Weighted Score
Ν	lo fatalities have occurred ir	the last three years

Sources

Grenergy Renovables SA Corporate Social Responsibility Report 2020 (FY2020) Grenergy Renovables SA Sustainability Report 2021 (FY2021) The company provided feedback on 18 February 2020 The company provided feedback on 18 February 2020



Management Details _

S.2.2.5 - Contractor Safety Programme

75 Raw Score	15.00% Weight	11.3 Weighted Score
	The company has a stre	ong programme
Criteria		
Compliance w	ith safety guidelines includ	ded in contractual agreements.
Monitoring of a	contractor safety performa	nce
Objectives or	targets regarding contracto	or safety
Operating guide	delines on contractor safet	y management
Policy commit	ment to protect the safety	of contractors
Prescreening	of contractors for safety pe	erformance and risks
Reporting on a	contractor safety managen	nent
Safety training	for contractors	
Sources		

Sources

Grenergy Renovables SA Corporate Social Responsibility Report 2019 (FY2019) Grenergy Renovables SA Sustainability Policy, released December 2021 Grenergy Renovables SA Sustainability Report 2021 (FY2021)

.....

The company provided feedback on 10 February 2021

S.2.2.6 - Contractor Fatalities

100	15.00%	15.0
Raw Score	Weight	Weighted Score

No fatalities have occurred among contractors in the last three years

Sources

Grenergy Renovables SA Corporate Social Responsibility Report 2020 (FY2020) Grenergy Renovables SA Sustainability Report 2021 (FY2021) The company provided feedback on 18 February 2020

The company provided feedback on 18 February 2020

.....



Appendix **Exposure Details** 0 80 0 Q **Community Relations** -0 ้อ **EA.E.10 - Community Relations** EA.E.48 - Society - Human Rights 0.00 0.00 Beta Signal Beta Signal No evidence of relevant controversies No evidence of relevant controversies **EA.F.1 - Operating Performance** EA.F.2 - Solvency - 0.02 0.03 Beta Signal Beta Signal The company has a very weak debt-equity ratio. The company has a strong net income margin. Average Net Income Margin (Trailing 3 Years): 24.39% Average Debt to Equity Ratio (3 Period Exponentially Weighted Average as of Subindustry Median (Trailing 3 Years): 13.37% December 2021): 2.43 Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved. Subindustry Median (3 Period Exponentially Weighted Average as of December 2021): 1.47 Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved. EA.F.3 - Financial Flexibility EA.F.4 - Asset Performance 0.02 - 0.03 Beta Signal Beta Signal The company has a weak cash flow ratio. The company has a very strong return on assets. Average Free Cash Flow Ratio (Trailing 3 Years): -75.99% Average Return on Assets (Trailing 3 Years): 11.43% Subindustry Median (Trailing 3 Years): 3.06% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved. Subindustry Median (Trailing 3 Years): 2.35% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.



آرة Exposure Details

EA.S.1 - Qualitative Overlay

0.00

Beta Signal

Answer category for neutral beta signal adjustment

.....

EA.S.2 - Subindustry Correction Factor

0.00 Beta Signal

EA.S.3 - Exceptional Event Adjustment

0.00

Beta Signal

.....



SUSTAINALYTICS ESG RISK RATING REPORT

Appendix

Management Details _

S.4.2.2 - Community Involvement Programmes

100		40.00%	40.0
Raw S	Score	Weight	Weighted Score
	The co	mpany has a very strong pr	rogramme
Criter	ia		
<u>.</u>	ccessible mechanis rievances	m to collect, record and add	fress complaints or
A formal system for identifying local stakeholders or communities of interest			
Community consultation guidelines			
Consultation conducted at early stages of a project			
 Executive responsibility for community relations 			
C	Ongoing consultation	mechanisms	
<u> </u>	peration-specific res	sponsibility for community re	elations
P	olicy commitment to	consult with local commun	ities
Sourc	es		
Grene	rgy Renovables SA	Sustainability Policy, releas	ed December 2021

Grenergy Renovables SA Sustainability Report 2021 (FY2021)

The company provided feedback on 10 February 2021

S.4.2.10 - Access to Basic Services

100	20.00%	20.0
Raw Score	Weight	Weighted Score
The company ha	as programmes and provid scope of the	es good quantitative details on the ese

Sources

The company provided feedback on 10 February 2021

S.4.2.11 - Community Development Programmes

75	40.00%	30.0
Raw Score	Weight	Weighted Score
	The company has stro	ng programme

Criteria

- Commitment to promote community development
- Community development initiatives
- Community development targets and deadlines
- Initiatives to promote economic development after closure
- Monitoring of community development programmes
- Reporting on community development programmes and results \checkmark
- Systematic involvement of local stakeholders in community development \checkmark planning and/or monitoring

Sources

Grenergy Renovables SA Sustainability Policy, released December 2021

Grenergy Renovables SA Sustainability Report 2021 (FY2021)

The company provided feedback on 06 September 2022

The company provided feedback on 10 February 2021

The company provided feedback on 13 September 2022



лрропал	
Exposure Details	
Business Ethics	
EA.E.2 - Accounting and Taxation	EA.E.4 - Anti-Competitive Practices
0.00 Beta Signal	0.00 Beta Signal
No evidence of relevant controversies	No evidence of relevant controversies
EA.E.6 - Bribery and Corruption	EA.E.7 - Business Ethics
0.00 Beta Signal	0.00 Beta Signal
No evidence of relevant controversies	No evidence of relevant controversies
EA.E.21 - Intellectual Property	EA.E.23 - Lobbying and Public Policy
0.00 Beta Signal	0.00 Beta Signal
No evidence of relevant controversies	No evidence of relevant controversies
EA.E.30 - Sanctions	EA.F.1 - Operating Performance
0.00	- 0.02

Beta Signal

No evidence of relevant controversies

Beta Signal

The company has a strong net income margin.

Average Net Income Margin (Trailing 3 Years): 24.39% Subindustry Median (Trailing 3 Years): 13.37% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.



Exposure Details

EA.F.2 - Solvency

0.03

Beta Signal

The company has a very weak debt-equity ratio.

Average Debt to Equity Ratio (3 Period Exponentially Weighted Average as of December 2021): 2.43 Subindustry Median (3 Period Exponentially Weighted Average as of December 2021): 1.47

Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.

EA.F.3 - Financial Flexibility

0.02 Beta Signal

ela Signai

The company has a weak cash flow ratio.

Average Free Cash Flow Ratio (Trailing 3 Years): -75.99% Subindustry Median (Trailing 3 Years): 3.06% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.

EA.F.4 - Asset Performance

- 0.03

Beta Signal

The company has a very strong return on assets.

Average Return on Assets (Trailing 3 Years): 11.43% Subindustry Median (Trailing 3 Years): 2.35% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.

EA.S.1 - Qualitative Overlay

0.00

Beta Signal

Answer category for neutral beta signal adjustment

EA.S.2 - Subindustry Correction Factor

0.00 Beta Signal

EA.S.3 - Exceptional Event Adjustment

0.00 Beta Signal

a Morningstar company

Management Details -

G.1.1 - Bribery & Corruption Policy

10	0	10.00%		10.0
Rav	v Score	Weight		Weighted Score
	The	company has a v	ery strong) policy
Crit	eria			
	Definition and prohibit	tion of facilitation	payments	
	Definition of bribery o	r corruption		
	Definition of conflicts	of interest and co	mmitment	to minimize these
	Guidelines of what is considered acceptable behaviour			
	Prohibition of bribery			
\bigcirc	There is no evidence of a formal policy but the company has a general statement addressing the issue			
Sou	irces			
Gre	nergy Renovables SA	Code of Business	Ethics, re	eleased May 2018
The	company provided fee	dback on 06 Sep	tember 20)22
The	company provided fee	edback on 10 Feb	ruary 202	1
The	company provided fee	edback on 13 Sep	tember 20)22
The	company provided fee	edback on 15 Sep	tember 20)22
	updated ESG Report	was sent by emai	l to Grene	rgy Renovables SA on 29

G.1.2 - Whistleblower Programmes

100 Raw Score	25.00% Weight	25.0 Weighted Score	
Th	e company has a very	strong programme	
Criteria			

An independent, reporting hotline available 24/7

- Available in local languages
- Available to suppliers, customers and other third parties
- Disclosure on the number of reports received, the types of misconduct and measures taken
- Non-retaliation policy
- Possibility for anonymous reporting and reports are treated confidentially
- Proactively communicated to employees
- Structures in place to process whistleblower reports

Sources

Grenergy Renovables SA Ethical Channel Process, accessed 17 August 2022 Grenergy Renovables SA Sustainability Report 2021 (FY2021) The company provided feedback on 06 September 2022

The company provided feedback on 10 February 2021

G.1.1.1 - Bribery & Corruption Programmes

75	25.00%	18.8
Raw Score	Weight	Weighted Score
	The company has a stro	ong programme
Criteria		
Annual signoff	of the policy on bribery ar	nd corruption by employees
Internal monitor	Internal monitoring system to detect corruption	
Managerial res	Managerial responsibility for bribery and corruption	
Mechanisms for	Mechanisms for employees to consult on ethical issues	
Operating guidelines addressing record keeping, approval procedures and appropriate behaviour		
Regular bribery and corruption risk assessments		
Regular trainin	Regular training on bribery and corruption	
Sources		
Greneray Renovab	les SA Corporate Governa	ance Report 2021 (FY2021)

Grenergy Renovables SA Corporate Governance Report 2021 (FY2021) Grenergy Renovables SA Sustainability Report 2021 (FY2021) The company provided feedback on 06 September 2022 The company provided feedback on 10 February 2021

G.1.2.1 - Business Ethics Programme

75 Raw Score	25.00%	18.8	
Raw Score	Weight	Weighted Score	
Oritoria	The company has a str	ong programme	
Criteria			
Annual training of employees on the Code of Conduct			
 Board responsibility for business ethics issues 			
Commitment t	Commitment to address major business ethics risks		
Ethical risk as	sessments		

- Ethical risk assessments
- Incident investigation and corrective actions
- Managerial responsibility for business ethics
- Measures to deter non-compliance and reduce exposure to unethical opportunities
- Operating guidelines

Sources

Grenergy Renovables SA Code of Business Ethics, released May 2018 Grenergy Renovables SA General Policy on Management, Risk Control and Internal Audit, accessed 17 August 2022

Grenergy Renovables SA Sustainability Report 2021 (FY2021)

The company provided feedback on 06 September 2022

The company provided feedback on 10 February 2021



译译 Man

Management Details -

G.3.1 - Political Involvement Policy

75 Raw Score	10.00% Weight	7.5 Weighted Score
	The company has an a	5
Criteria		
Approved by senior management		
Commits the company to disclose political donations and/or lobbying expenditures		
Partially prohibits political involvement		
Prohibits political involvement of any kind on the company's behalf		

Sources

The company provided feedback on 06 September 2022

.....

G.3.2 - Lobbying and Political Expenses

100	5.00%	5.0
Raw Score	Weight	Weighted Score

Based on available evidence, the company does not make political contributions and is not involved in lobbying activities

Sources

European Commission & European Parliament Transparency Register, www.ec.europa.eu; accessed 17 August 2022



Annendiv

EA.F.1 - Operating Performance
- 0.02
Beta Signal
The company has a strong net income margin.
Average Net Income Margin (Trailing 3 Years): 24.39% Subindustry Median (Trailing 3 Years): 13.37% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.
EA.F.3 - Financial Flexibility
0.02
Beta Signal
The company has a weak cash flow ratio.
Average Free Cash Flow Ratio (Trailing 3 Years): -75.99% Subindustry Median (Trailing 3 Years): 3.06% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.

EA.F.4 - Asset Performance

- 0.03

Beta Signal

The company has a very strong return on assets.

Average Return on Assets (Trailing 3 Years): 11.43% Subindustry Median (Trailing 3 Years): 2.35% Source: Morningstar, December 2021. All Rights Reserved., FactSet, December 2021. All Rights Reserved.

EA.G.1 - Headquarters Location

	\sim	0	
-			/

Beta Signal

The location of the company's headquarters indicates slightly lower exposure to this issue.

Spain: Slightly lower exposure Source: Sustainalytics Country Risk Rating, December 2021.



Exposure Details

EA.G.2 - Assets Location EA.S.1 - Qualitative Overlay 0.00 0.00 Beta Signal Beta Signal The location of the company's assets does not signal higher or lower exposure to Answer category for neutral beta signal adjustment this issue. Chile: 44% (Slightly lower exposure) Argentina: 17% (Average exposure) Peru: 16% (Average exposure) Spain: 13% (Slightly lower exposure) Other: 10% Source: Sustainalytics Country Risk Rating, December 2021." Morningstar, December 2021. All Rights Reserved. EA.S.2 - Subindustry Correction Factor EA.S.3 - Exceptional Event Adjustment 0.00 0.00 Beta Signal Beta Signal



Management Details _

E.1.1 - Environmental Policy

75	11.76%	8.8	
Raw Score	Weight	Weighted Score	
The company has a strong policy			
Criteria			
Approved by s	enior management or the	board of directors	
Commitment to consult with stakeholders on environmental issues			
Commitment to create environmental awareness			
Commitment to environmental protection			
Commitment t	Commitment to implement an environmental management system		
Commitment t	Commitment to monitor the company's environmental performance		
Commitment to reduce emissions, releases and wests			

- Commitment to reduce emissions, releases and waste
- Commitment to report regularly on environmental issues 1
- Commitment to use natural resources or energy more efficiently

Sources

Grenergy Renovables SA Code of Business Ethics, released May 2018 Grenergy Renovables SA Sustainability Policy, released December 2021 The company provided feedback on 10 February 2021

E.1.2 - Environmental Management System

100	35.29%	35.3
Raw Score	Weight	Weighted Score
The company has a very strong EMS		

Criteria

- Assigned roles and responsibilities
- Compliance with environmental regulation
- Corrective actions to stimulate continual improvement
- Environmental performance records
- Environmental programmes
- External environmental audits
- Identification of products, activities and services that have significant impacts \checkmark on the environment
- Internal and external communications on environmental management issues
- Internal environmental audits
- Managerial or board level responsibility for environmental issues \checkmark
- Monitoring and measurement
- Objectives, targets and deadlines
- Training and awareness programmes for employees

Sources

Prior to research start date, the company sent documents on 22 January 2021

E.1.2.1 - Biodiversity Programmes

100	47.06%	47.1
Raw Score	Weight	Weighted Score

The company has a very strong programme

Criteria

- Biodiversity management plans for priority areas
- Engagement with local residents or biodiversity experts
- Formal commitment to minimise impact on biodiversity or to consider 1 biodiversity in planning
- Formal commitment to 'no net loss' or having a 'net positive impact' on biodiversity
- Formal policy commitment to avoid operating in areas with the highest biodiversity value
- Identification of biodiversity priority areas \checkmark
- Implementation of best-practice mitigation hierarchy
- Managerial or board level responsibility for biodiversity issues
- Reporting on biodiversity programmes or impacts \checkmark
- Systematic consideration of local threats to biodiversity beyond the company's business activities
- Targets and deadlines related to biodiversity

Sources

Grenergy Renovables SA Sustainability Policy, released December 2021 Grenergy Renovables SA Sustainability Report 2021 (FY2021) The company provided feedback on 06 September 2022 The company provided feedback on 10 February 2021 The company provided feedback on 10 February 2021

E.1.3 - EMS Certification

100	5.88%	5.9
Raw Score	Weight	Weighted Score

90% or more of the company's activities have received external certification

Sources

Prior to research start date, the company sent documents on 22 January 2021



Grenergy Renovables SA

Renewable Power Production Spain MCE:GRE

GLOSSARY OF TERMS

Beta (Beta, β)

A factor that assesses the degree to which a company's exposure deviates from its **subindustry**'s exposure on a **material ESG issue**. It is used to derive a company-specific issue exposure score for a material ESG issue. It ranges from 0 to 10, with 0 indicating no exposure, 1 indicating the subindustry average, and 10 indicating exposure that is ten times the subindustry average.

Corporate Governance Pillar

A pillar provides a signal about a company's management of a specific Corporate Governance issue.

ESG Risk Category

Companies' ESG Risk Rating scores are assigned to five ESG risk categories in the ESG Risk Rating:

Negligible risk: enterprise value is considered to have a negligible risk of material financial impacts driven by ESG factors

Low risk: enterprise value is considered to have a low risk of material financial impacts driven by ESG factors

Medium risk: enterprise value is considered to have a medium risk of material financial impacts driven by ESG factors

High risk: enterprise value is considered to have a high risk of material financial impacts driven by ESG factors

Severe risk: enterprise value is considered to have a severe risk of material financial impacts driven by ESG factors

Note that because ESG risks materialize at an unknown time in the future and depend on a variety of unpredictable conditions, no predictions on financial or share price impacts, or on the time horizon of such impacts, are intended or implied by these risk categories.

ESG Risk Rating Score (Unmanaged Risk Score)

The company's final score in the ESG Risk Rating; it applies the concept of risk decomposition to derive the level of unmanaged risk for a company.

Event Category

Sustainalytics categorizes events that have resulted in negative ESG impacts into five event categories: Category 1 (low impact); Category 2 (moderate impact); Category 3 (significant impact); Category 4 (high impact); and Category 5 (severe impact).

Event Indicator

An indicator that provides a signal about a potential failure of management through involvement in controversies.

Excess Exposure

The difference between the company's exposure and its subindustry exposure.

Exposure

A company or subindustry's sensitivity or vulnerability to ESG risks.

Idiosyncratic Issue

An issue that was not deemed material at the **subindustry** level during the **consultation process** but becomes a **material ESG issue** for a company based on the occurrence of a Category 4 or 5 event.

Manageable Risk

Material ESG risk that can be influenced and managed through suitable policies, programmes and initiatives.

Managed Risk

Material ESG Risk that has been managed by a company through suitable policies, programmes and initiatives.

Management

A company's handling of ESG risks.

Management Gap

Refers to the difference between what a company has managed and what a company could possibly manage. It indicates how far the company's performance is from best practice.

Management Indicator

An indicator that provides a signal about a company's management of an ESG issue through policies, programmes or quantitative performance.

Material ESG Issue

A core building block of the ESG Risk Rating. An ESG issue is considered to be material within the rating if it is likely to have a significant effect on the enterprise value of a typical company within a given subindustry.

Subindustry

Subindustries are defined as part of Sustainalytics' own classification system.

Unmanageable Risk

Material ESG Risk inherent from the intrinsic nature of the products or services of a company and/or the nature of a company's business, which cannot be managed by the company if the company continues to offer the same type of products or services and remains in the same line of business.

Unmanaged Risk

Material ESG risk that has not been managed by a company, and includes two types of risk: **unmanageable risk**, as well as risks that could be managed by a company through suitable initiatives, but which may not yet be managed (management gap).



Grenergy Renovables SA

Renewable Power Production Spain MCE:GRE

DISCLAIMER

Copyright © 2023 Sustainalytics. All rights reserved.

The information, methodologies, data and opinions contained or reflected herein are proprietary of Sustainalytics and/or its third parties suppliers (Third Party Data), intended for internal, non-commercial use, and may not be copied, distributed or used in any way, including via citation, unless otherwise explicitly agreed in writing. They are provided for informational purposes only and (1) do not constitute investment advice; (2) cannot be interpreted as an offer or indication to buy or sell securities, to select a project or make any kind of business transactions; (3) do not represent an assessment of the issuer's economic performance, financial obligations nor of its creditworthiness.

These are based on information made available by third parties, subject to continuous change and therefore are not warranted as to their merchantability, completeness, accuracy or fitness for a particular purpose. The information and data are provided "as is" and reflect Sustainalytics' opinion at the date of their elaboration and publication. Sustainalytics nor any of its third-party suppliers accept any liability for damage arising from the use of the information, data or opinions contained herein, in any manner whatsoever, except where explicitly required by law. Any reference to third party names or Third Party Data is for appropriate acknowledgement of their ownership and does not constitute a sponsorship or endorsement by such owner. A list of our third-party data providers and their respective terms of use is available on our website. For more information, visit http://www.sustainalytics.com/legal-disclaimers.

