



# PROCUREMENT POLICY

DECEMBER 2023

## Monitoring of revisions

Date of drafting	Date of approval	Version No.	Description of modifications
26/10/2021	20/12/2021	1	Initial version

## 1. Policy Goal

The Board of Directors of Greenergy Renovables, S.A. ("GREENERGY" or the "Company") is empowered by law to determine the Company's general policies and strategies.

Under this policy, Greenergy undertakes to control and manage the risks related to the procurement of equipment and/or services, to promote compliance and ethical behaviour and to transfer the principles of its Sustainability Policy to its supply chain

## 2. Scope of application

The Procurement Policy applies to all Greenergy Group companies, including investee companies in which Greenergy has effective control or the possibility of such control. The policy is also applicable in all countries where Greenergy carries out its operations, whatever their nature, i.e. in any geographical area and at any stage of the corporate value chain. In the case of investee companies where Greenergy does not have effective control, it shall do its utmost to promote compliance by such companies with the commitments set forth herein.

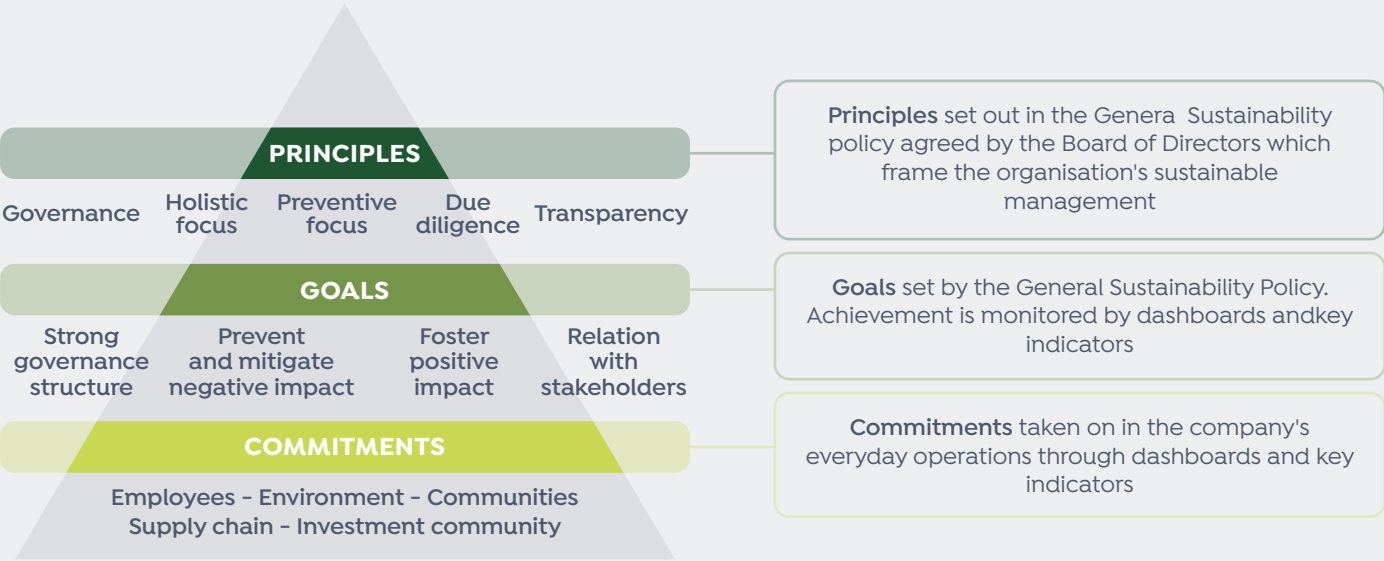
Furthermore, Greenergy shall make its best efforts and use its influence levers to ensure that its stakeholders, especially in the supply chain, comply with this Policy. Accordingly, the Company applies this Policy's scope of action and its commitments to its stakeholders: distributors, contractors, service providers and other relevant third parties throughout their contractual relationship.

## 3. Principles for action

This Procurement Policy is based on the basic principles of action defined by Greenergy and assumed by the Board of Directors in its Sustainability Policy. These principles are embodied in basic foundational goals from which the company's specific commitments to each stakeholder group stem in turn.

The commitments identified by Greenergy in its Sustainability Policy are in line with the Sustainable Development Goals that the company has designated as priority SDGs 5, 7, 8, 13 and 15.





**Fig 1.** Diagram of the relationship between the basic principles of action, the foundational goals and the implementation in commitments undertaken with stakeholders, as defined by the Company in its Sustainability Policy.

Procurement, in addition to the primary objective of seeking and optimising the supply of goods and services, shall be oriented towards developing a long-term relationship with suppliers. Accordingly, Greenergy shall seek to control, mitigate and reduce as far as possible the risks associated with the quality and sustainability of the materials and equipment purchased, as well as work and service procurement.

Relations with suppliers shall be based on legality, efficiency, the principles of business ethics and transparency, the search for continuous improvement and mutual benefit, the application of good environmental practices, and the promotion of innovation and development activities. This Policy shall be applied by means of a procedure that guides the process of purchases made by tender, and direct purchases and contracts between Group companies, aiming to ensure adherence to principles and ethical behaviour during the procurement process, in addition to compliance by suppliers with the contractual terms and conditions.

Technical specifications and other technical documentation shall be defined in a non-exclusive manner, and shall be clear and objective, promoting competition and equal opportunities

The procurement procedure shall be applied in compliance with Greenergy's **Code of Business Ethics** and **Crime Prevention Protocol**, with zero tolerance for any behaviour included in the Catalogue of Prohibited Conduct in this protocol, which identifies, *inter alia*, those related to bribery and corruption. Other behaviour contrary to current legislation, which may not be included in the Catalogue and which is also prohibited, shall also be rejected.

In the event of signs of any crime or irregularity, the measures defined in the response policy of the Crime Prevention Protocol shall be taken for their investigation and resolution

## 4. Extending principles to the supply chain

### 4.1 Adherence to ethical principles

During the process of entering into a contractual relationship with the Supplier, through a contract, commercial agreement or order, the Supplier involved in the activities contracted by Greenergy must expressly accept and adhere to the Business Code of Ethics and the Suppliers' Code of Ethics.

Suppliers shall also be required to accept and adhere to Greenergy's Human Rights Policy.

### 4.2 Assessment of sustainability issues

Greenergy has a proactive attitude to its stakeholders, pays special attention to its supply chain, and is satisfied that its behaviour complies with its Sustainability Policy.

The commitments undertaken by Greenergy in its Sustainability Policy for its supply chain are in line with Sustainable Development Goals 5 and 8, and the environmental commitments are in line with SDGs 7, 13 and 15. In this respect, **the ethical, environmental and social issues** that directly contribute to promoting compliance with these commitments shall support the decision-making process for the procurement or contracting of goods or services. For this purpose, Greenergy shall use **supplier risk maps** as a tool for controlling and managing supply chain risk, after collecting the relevant information.

The **environmental criteria**, aligned with SDGs 7, 13, 15, used in the risk assessment shall include, *inter alia*, those that help the company to reduce its carbon footprint, promote biodiversity and the conservation of the natural environment, comply with environmental legislation and reduce the potential impact that the full life cycle of the services or goods procured may have on the environment.

**Ethical and social criteria**, aligned with SDGs 5 and 8, shall include health and safety, respect for human rights, fair treatment of workers and equal opportunities.

## 5. Complaints channel

In order to allow any person, whether Greenergy employee or not, to report any breach of the principles set out in this Policy, a whistleblowing channels is provided on the website, which guarantees confidentiality.

Greenergy undertakes to implement mechanisms to remedy any non-compliance identified.

## **6. The Policy's Public Nature**

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This policy is public and shall be permanently hosted on Greenergy's website, and on its subsequent modifications.

## **7. Approval and monitoring of the Policy by the Board of Directors**

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This Policy has been approved by the Board of Directors, which is supported by the Appointments and Remuneration Committee to supervise its compliance.