



The sky is the limit

# SUSTAINABILITY STRATEGY

2024-2026

# ESG, THE HEART OF GREENERGY

*Reasons to invest in and promote ESG issues*



Greenergy is renewable by nature. We are aware that the excellence and sustainability of our business depends on our ability to anticipate and manage risks and opportunities while ensuring respect for and protection of nature and local communities. Our ESG strategy, aligned with our business strategy, is proof of this.

## What do we want to achieve?

## Why do we want to achieve it?

## How?



- Energy transition: increasing installed solar and storage capacity
- Carbon Neutrality (Net Zero following SBTi in 2040) and Climate Change Adaptation (TCFD)
- Caring for the planet

- Greenergy contributes to the energy transition to a low-carbon economy through its renewable energy generation.
- We want to lead by example by taking care of the planet in our own operations, reducing as much as possible our negative impacts on the environment, and those of our value chain.
- Rigorous climate risk studies are key to protecting the value of our assets.



- Attracting and retaining talent
- Diversity, equality and inclusion
- Alignment with human rights standards

- People are our most important asset and creating an environment that fosters excellence, promotes our values and encourages diversity is key to Greenergy's success.
- The photovoltaic renewable energy value chain is particularly vulnerable to HRDs.

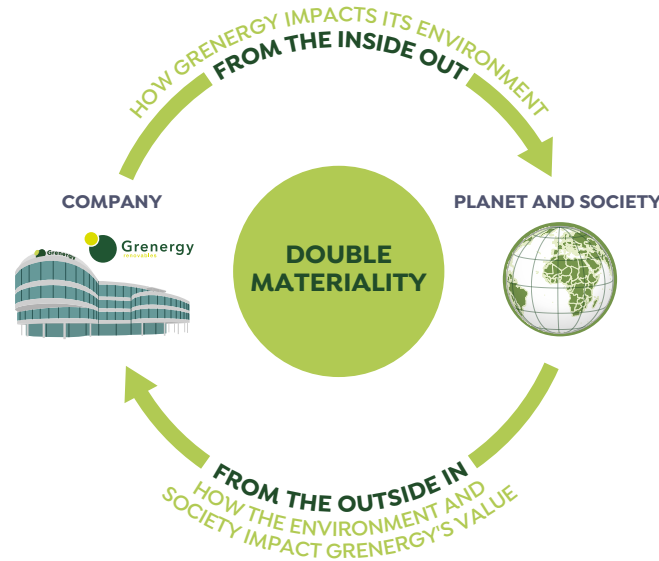


- Good governance and corporate conduct
- Risk management culture
- Responsible value chain

- As a listed company, operating in a multitude of countries, our responsibility is to foster a culture of compliance, transparency and prudent risk management.
- The value chain presents risks in terms of respect for human rights, emissions, corruption and traceability, while a well-managed value chain presents competitive advantages.

**Greenergy Sustainability  
Strategy 2024-2026**

## DUAL MATERIALITY ANALYSIS



### FINANCIAL MATERIALITY

Matters that have a significant financial impact on companies, generating significant risks and opportunities that may have an impact on future cash flows and therefore on the value of the company in the short, medium or long term.

### MATERIALITY OF IMPACT

Issues that result in significant actual or potential significant impacts of the company on people or the environment in the short, medium or long term.

### METHODOLOGY

#### 1. Context of the organisation

ESG and business strategy, purpose, sector, business relationships, value chain, economic, environmental, social challenges and identification of *stakeholders* and their impacts.

#### 2. Identification of ESG impacts

levels according to the typology of the source of the identified impact:

- I. *Agnostic*: cross-cutting issues for all companies
- II. Sectoral: relevant issues for companies in the sector
- III. Company: relevant topics according to specific activities

#### 3. Impact materiality analysis

- Identification of the actual and potential positive and negative impacts of Greenergy on the environment and people.
- Assessment of the impacts generated in terms of likelihood and severity according to scale, scope and irremediable character

#### 4. Financial materiality analysis

- Identification of actual and potential positive and negative impacts on Greenergy that may pose a financial risk or opportunity for the company.
- Assessment of the impacts suffered based on their likelihood and financial effects. Internal methodology following the interpretation of the EFRAG and SASB standard.

#### 5. Prioritisation of the impacts suffered and generated

- Establishment of a methodology for prioritisation of impacts suffered and generated following the EFRAG dual materiality report narrative and the GRI 3 standard.
- Identification of a threshold for determining which topics are material for reporting categorised as critical relevance level.

#### 6. External analysis

Engaging the perspective of funders, shareholders and investors, employees and the Board of Directors

#### 7. Mathematical weighting

Mathematical intersection in a matrix, x-axis (impact) and y-axis (financial) Same ponderation for internal and external analysis

### STANDARDS



## RESULT OF THE DUAL MATERIALITY ANALYSIS



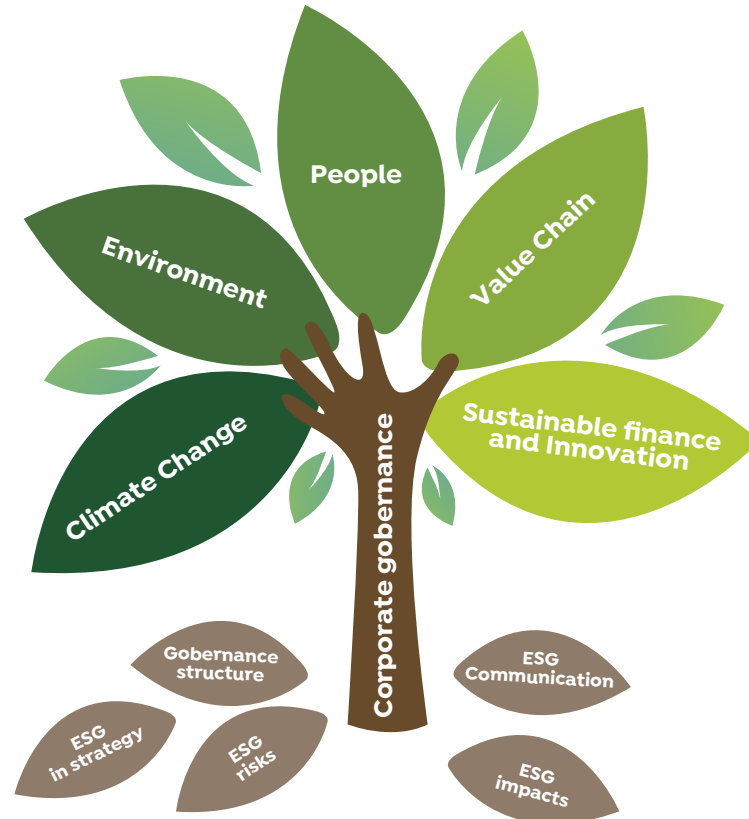
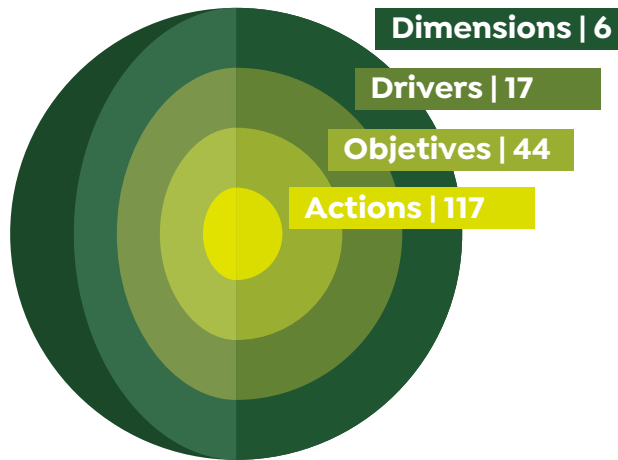
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|----|--|
| 1  | Climate Neutrality and Energy Transition                             |
| 2  | Conservation and restoration of biodiversity and ecosystems          |
| 3  | Circular economy and efficient consumption and waste management      |
| 4  | Responsible management of water resources                            |
| 5  | Contribution to the development and involvement of local communities |
| 6  | Diversity, equality and inclusion                                    |
| 7  | Health and safety  |
| 8  | Attracting, developing and retaining human capital                   |
| 9  | Sustainable supply chain   |
| 10 | Respect for and protection of human rights                           |
| 11 | Transparency and responsible taxation                                |
| 12 | Financial and non-financial risk management system                   |
| 13 | Good governance and fair corporate conduct                           |
| 14 | Cybersecurity and information security                               |
| 15 | Commitment to the customer and supplier                              |
| 16 | Financial economic performance and green finance                     |
| 17 | R&D&I in new markets and renewable technologies                      |

● Environmental  
 ● Social  
 ● Government  
 ● Financial

## STRUCTURE | 4 LEVELS

## DIMENSIONS | 6

## DRIVERS | 17 (9 STRATEGIC)



### Fighters against **CLIMATE CHANGE**

- Climate neutrality and energy transition

### Protectors of **ENVIRONMENT**

- Conservation and restoration of biodiversity and ecosystems
- Circular economy, efficient consumption and waste management
- Responsible management of water resources

### Promoters of the best teams and **PEOPLE**

- Attracting, developing and retaining human capital
- Respect and protection of human rights
- Diversity, equality and inclusion

### Integrators of the **VALUE CHAIN**

- Contribution to the development of local communities
- Sustainable supply chain
- Health and safety
- Commitment with customers and suppliers

### Fulfillers of **SUSTAINABLE FINANCE** criteria and **INNOVATION** drivers

- Economic and financial performance & green financing
- R&D&i in new technologies and markets

### Enhancer of a good **CORPORATE GOVERNANCE**

- Transparency and responsible taxation
- Good governance and fair corporate conduct
- Financial and non-financial risk management systems
- Cybersecurity and information security

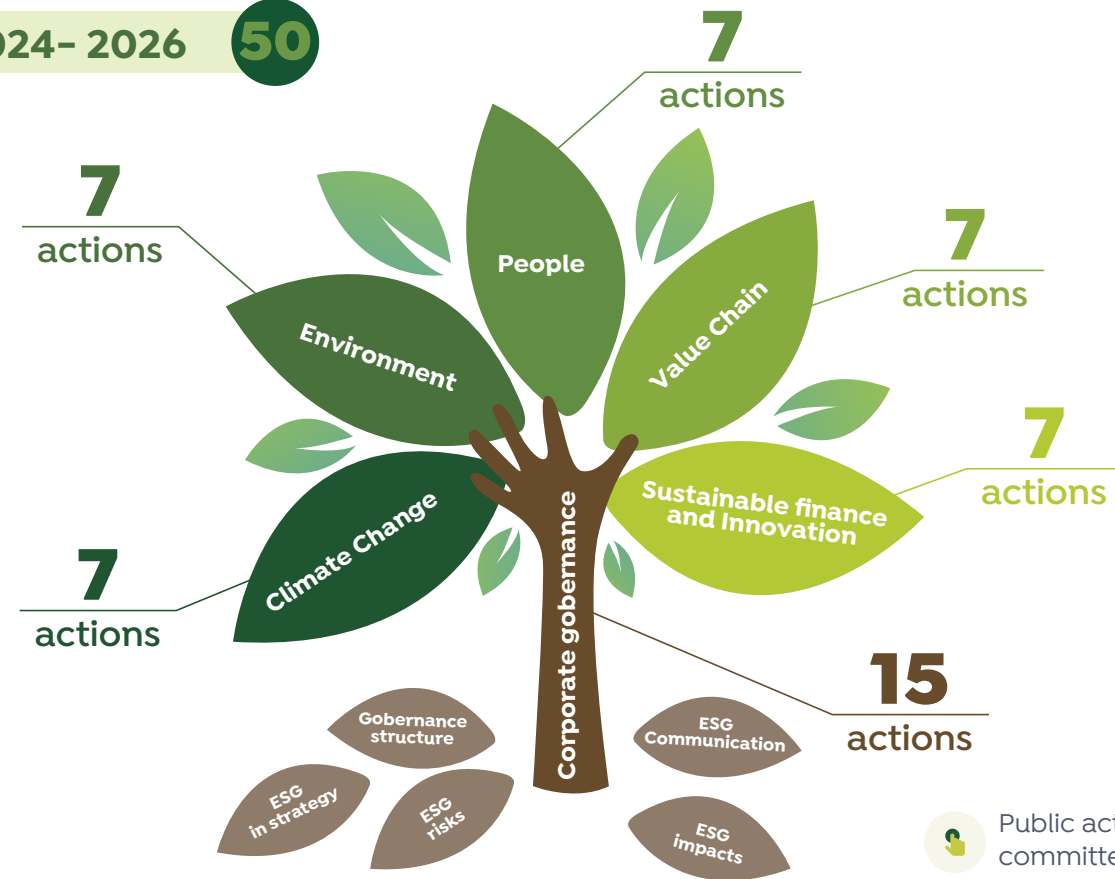
# GREENERGY SUSTAINABILITY STRATEGY (ESG) 2024-2026

Critical Actions and other Actions 2024-2026



## ESG Critical Actions 2024- 2026

50



Public actions | to be reported in committees/board of directors

## Responsible and collaborating areas Greenergy

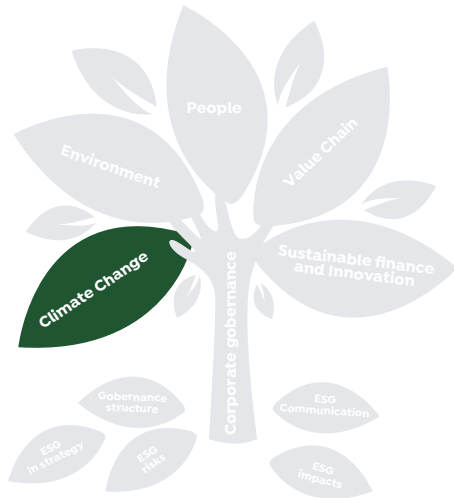
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AM - COMMISSIONS/BOARD - COMPLIANCE - PROCUREMENT - COMMUNICATION & MARKETING - DEVELOPMENT - ESG - EPC - FINANCIAL FISCAL IT& DIGITAL TRANSFORMATION - LEGAL - NEW TECHNOLOGIES - O&M - INVESTOR RELATIONS - RISK & INTERNAL CONTROL HR HEALTH & SAFETY - GENERAL SERVICES

# GREENERGY SUSTAINABILITY STRATEGY (ESG) 2024-2026

CRITICAL Actions - Public - to report to Commissions/Board of Directors

## DIMENSION: CLIMATE CHANGE



Drivers	Objectives	Critical Actions
Climate neutrality and energy transition	60% reduction of GHG emissions in Scope 1 and 2 (in absolute terms) and 50% reduction of Scope 3 emissions (relative unit, per sales) by 2030 (base year 2021). Target higher than supported by science for SMEs (according to SBTi)	Development of a decarbonisation strategy for Scope 3 (value chain) of the carbon footprint  Obtaining our most ambitious science-backed 50% GHG emission reduction commitment (SBTi - for non-SMEs)
	Carbon neutrality (0 net emissions) by 2040: reducing (priority) and offsetting our emissions	Elaboration of the 2040 emissions offset strategy. Carbon credits/internal carbon price
	Promoting climate change adaptation measures in projects	Elaboration of climate risk scenario report according to IPCC  Preparation of the annual climate change report according to TCFD recommendations in accordance with the Climate Change Act.
	Improving transparency and promoting actions to combat climate change through policies	Elaboration and implementation of a climate change adaptation plan in business strategy  Development of the Climate Change action policy

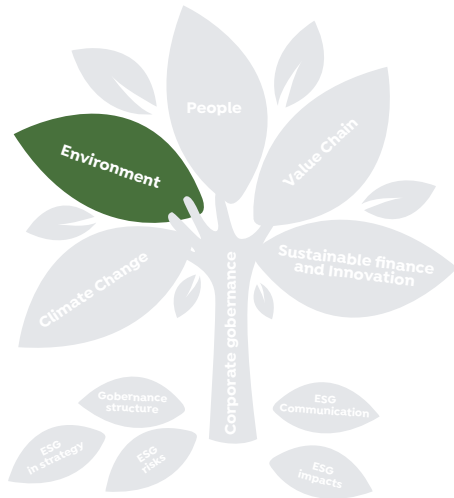




# GREENERGY SUSTAINABILITY STRATEGY (ESG) 2024-2026

CRITICAL Actions - Public - to report to Commissions/Board of Directors

## DIMENSION: ENVIRONMENT



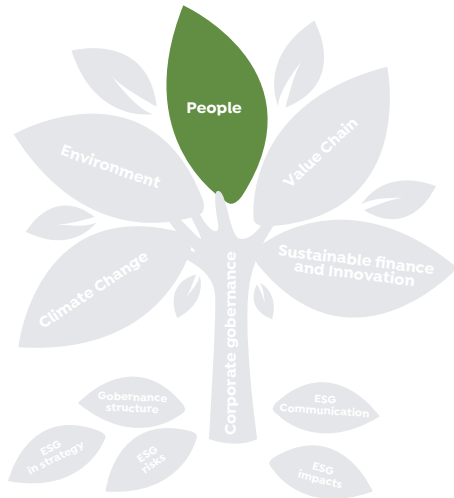
Drivers	Objectives	Critical Actions
<p>Conservation and restoration of biodiversity and ecosystems</p>	<p>Positive footprint on biodiversity</p>	<p>Development/acquisition of biodiversity footprint measurement tool and biodiversity management dashboard</p> <p>Conduct a TNFD-based risk assessment and develop a positive biodiversity impact roadmap</p> <p>Adherence to Science Based Targets for Nature and TNFD</p>
	<p>Improving transparency and promoting actions to care for biodiversity through policies</p>	<p>Biodiversity policy development</p>
	<p>Circular economy and efficient consumption and waste management</p>	<p>Creation of an environmental management strategy at corporate and project level for all countries</p>
<p>Improving waste management (Corporate + Projects)</p>		<p>Development of a corporate circularity plan</p>
<p>Improving transparency and promoting environmental actions through policies</p>		<p>Circular Economy Policy Development</p>



# GREENERGY SUSTAINABILITY STRATEGY (ESG) 2024-2026

CRITICAL Actions - Public - to report to Commissions/Board of Directors

## DIMENSION: PEOPLE



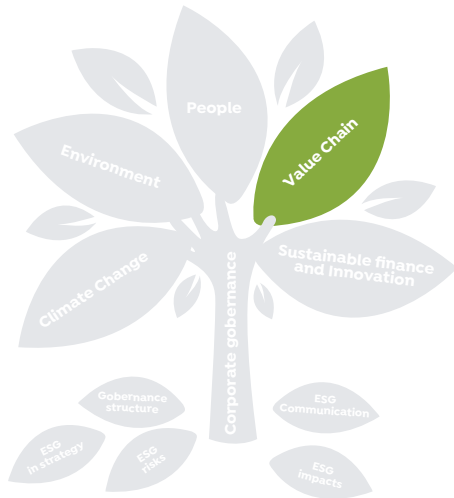
Drivers	Objectives	Critical Actions
Attracting, developing and retaining human capital	Laying the foundations for the drive to attract the best talent	Definition of the strategy "Greenergy Employer Branding"
	Generation of actions as a result of the work climate survey	Periodic presentation of the results of the work climate survey and implementation of actions following its results
	Boosting employees' skills and commitment to sustainability	Development of a corporate volunteering plan and involvement of employees in it  Drawing up a plan to include compliance with the 2024-2026 sustainability strategy in the variable remuneration of employees Implementation from 2025 onwards
Respect for and protection of human rights	Optimal implementation of the Human Rights (HR) respect, protection and remediation procedure in all activities and markets	Preparation of an annual human rights due diligence report in all countries
	Laying the foundations for the creation of the Greenergy Foundation	Technical and economic feasibility study for the creation of the Greenergy Foundation.
Diversity, equality and inclusion	Boosting diversity in all our geographies	Elaboration of the Equality, Diversity and Inclusion Policy



# GREENERGY SUSTAINABILITY STRATEGY (ESG) 2024-2026

CRITICAL Actions - Public - to report to Commissions/Board of Directors

## DIMENSION: VALUE CHAIN



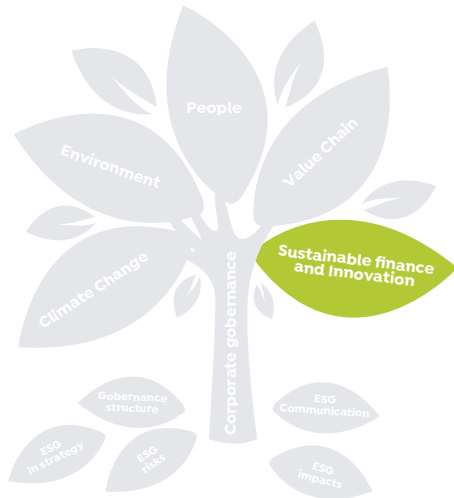
Drivers	Objectives	Critical Actions
Contribution to the development and involvement of local communities	Creation of a social strategy at the corporate and project level for all countries	Creation of a Social Management System (according to IFC/Equator Principles/ISO 45001) Social taxonomy alignment and eligibility exercise (no concrete European launch date yet)
Sustainable supply chain	Extending the scope of application of the supplier risk assessment and management tool	Inclusion of company-wide suppliers in supplier management tool Creating an audit community - conducting annual ESG audits of 100% of panel suppliers
	Mitigating environmental, social and corporate governance risk in the supply chain and creating new sustainable solutions	Update of the Purchasing Policy Development of a standard for third party approval/due diligence, including mitigation and control processes and mechanisms in accordance with the procurement procedure, and updating of the supplier code of conduct Report on the establishment of ESG supplier selection criteria (Go and No Go supplier selection criteria)



# GREENERGY SUSTAINABILITY STRATEGY (ESG) 2024-2026

CRITICAL Actions - Public - to report to Commissions/Board of Directors

## DIMENSION: SUSTAINABLE FINANCE



Drivers	Objectives	Critical Actions
Economic and financial performance and green finance	Increasing installed capacity and improving asset management	Periodic reporting of installed capacity increase (solar and storage) by geography and management of possible deviations Implementing an asset management system (ISO 55001)
	Boosting green finance for our projects	Renewal of the green notes programme and increase of green financing lines with other products
	Investment of >90 % of CAPEX in taxonomic activities	Annual reporting and verification of the alignment of our activities with the European taxonomy of sustainable activities (in accordance with regulatory updates and publications of delegated acts)
I+D+i en nuevos mercados y tecnologías	Boosting storage batteries in our countries. 5% annual increase in investment (open innovation)	Collaboration in one hydrogen-related public-private research project per year Registration in at least 1 association sector-related public-private partnerships in each market
	Boosting the digitalisation of the company	Implementation of the digital transformation plan (reporting of objectives and actions)



## DIMENSION: CORPORATE GOVERNANCE



Drivers	Objectives	Critical Actions
Transparency and responsible taxation	Quality, transparent and digitised reporting	Reporting of strategic indicators to the CNRS/Board of Directors
		Annual preparation of the sustainability report/EINF, to be published together with the annual accounts report, audited by an independent third party. Adaptation to the new CSRD Directive
		Annual response to questionnaires from rating agencies: DJSI, Sustainalytics, MSCI, etc.
	Improving external and internal communication	Review and modification of the General Communication Policy
		Elaboration of Stakeholder Relations Policy
	Improving fiscal transparency and practices through fiscal policy	Fiscal Policy Update



## DIMENSION: CORPORATE GOVERNANCE



Drivers	Objectives	Critical Actions
Good governance and fair corporate conduct	Implementation of state-of-the-art corporate governance practices	<ul style="list-style-type: none"> <li>Update of Sustainability/ESG Policy</li> <li>Development of Sustainable Travel Spending Policy</li> <li>Policy Update of Compliance</li> <li>Updating the Regulations of the Board of Directors and the Committees</li> <li>Creation of a sustainability commission (independent of NRC)</li> <li>Monitoring and reporting on ESG compliance 2024-2026</li> <li>Update of the company's dual materiality (including financial quantification of material issues)</li> </ul>
Financial and nonfinancial risk management systems	Identification and optimal management of financial and onfinancial risks. Integration of ESG risks into overall risk management	Updating the company's complete risk map (financial + onfinancial). Improvement of internal control
Cybersecurity and information security	Information security improvement	Defining an Information Security Master Plan





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