



HUMAN RIGHTS POLICY

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1. OBJECTIVE

Through this policy, Greenergy is committed to support, respect and contribute to the protection of fundamental human rights recognised nationally and internationally.

In addition, by means of this policy, Greenergy defines the principles to be applied in the corporate due diligence process in human rights and environmental matters, the aim of which is to avoid abuse or violation of the aforementioned, in the stakeholders with whom Greenergy relates in the context of its own operations, or in the framework of the products or services it provides by virtue of its commercial relations.

2. SCOPE

This document applies to all GREENERGY employees, as well as to all Group companies, including investee companies in which it has effective control or the possibility of effective control.

It is the responsibility of the above-mentioned natural and legal persons, regardless of their function within the organisation or company of the Group to which they belong, to be familiar with this document, to ensure that it is respected and complied with.

The group's internal regulations are part of the employee's contractual obligations and therefore any breach of them will lead to the appropriate disciplinary sanctions.

3. HUMAN RIGHTS POLICY

3.1.- International Referencies

In this Policy, the following international and European law treaties are taken as a reference:

1. The International Bill of Human Rights of the United Nations (UN).
 - The Universal Declaration of Human Rights.
 - The International Covenant on Civil and Political Rights.
 - The International Covenant on Economic, Social and Cultural Rights.
2. The fundamental conventions of the International Labour Organisation (ILO) Nos. 29, 87, 98, 100, 105, 111, 138 and 182, as well as the ILO Declaration on Fundamental Principles and Rights at Work.
3. The UN Convention on the Rights of the Child.
4. The European Convention on Human Rights.

In addition, the following corporate standards and voluntary initiatives have been taken into account in the drafting of this policy:

1. The UN Global Compact principles.
2. The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.
3. The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
4. The UN Guiding Principles on Business and Human Rights (Principles 16 to 24)

In relation to Greenergy's internal regulations, the following rules, protocols and procedures are aligned with this Policy:

1. Greenergy Code of Conduct.
2. Code of Conduct for Greenergy Suppliers and Third Party Intermediaries
3. Sustainability Policy
4. Global policy on preventing and combating harassment in the workplace
5. General risk management and control policy
6. Articles of Association of Greenergy
7. Management Commitment to Equality and 1st Equality Plan

3.2.- Basic principles for action in Greenergy

Greenergy assumes and promotes the following basic principles of action that ensure the protection of human rights within its sphere of influence.

3.2.1.- RESPECT FOR HUMAN RIGHTS AT WORK

- **Rejection of forced labour.** Greenergy rejects forced or compulsory labour, as well as any manifestation of physical, psychological or moral harassment or abuse of authority, or any other conduct that intimidates or offends the rights of individuals.

In no case shall it confiscate money or identity documents at the beginning of the employment relationship for the purpose of holding workers against their will.

- **Prohibition of child labour.** Greenergy rejects, does not practice or permit the use of child labour in any of its activities, in any region, in accordance with the legislation in force in the country in which such activities are carried out and respecting, in any case, the minimum age established in ILO Convention 138.
- **Elimination of discrimination in the workplace.** Greenergy does not accept any discrimination based on age, race, ethnicity, colour, sex, religion, political opinion, national extraction, sexual orientation, social origin, disability or

any distinction, exclusion or preference that has the effect of nullifying or impairing equality of opportunity or treatment in employment.

Women's participation at management and middle management level and equal opportunities are promoted.

The universal accessibility of the facilities is guaranteed to allow the integration of all people.

- **Defending freedom of association and collective bargaining.** Greenergy defends freedom of association and the effective recognition of the right to collective bargaining. Employees therefore have the right to associate, form and participate in the different organisations whose purpose is to promote and defend their interests. In turn, Greenergy recognises the right to employee representation.
- **Promotion of occupational health and safety.** Greenergy is committed to promoting a culture of health and safety at work through the necessary prevention tools, which promote the prevention of occupational risks that result in safe working environments.
- **Working conditions.** Greenergy promotes a culture of respect with zero tolerance for any form of verbal, physical, sexual or psychological harassment, as well as inhuman or degrading treatment. It complies with laws on working conditions and ensures fair remuneration for all the group's employees, enabling them to lead a full life without lacking basic necessities. In addition, employees are encouraged to be flexible at work and to be able to reconcile work and family life, without this affecting their career prospects.
- **Individual rights.** Greenergy is committed to respecting the rights of the individual, including but not limited to the right to life, equality before the law, the right to privacy, individual and collective property.
- **Communications.** Greenergy's communications are non-discriminatory and guided by respect for all cultures.

3.2.2.- RESPECT FOR HUMAN RIGHTS AT LOCAL COMMUNITY LEVEL

Our commitment to upholding human rights also extends to local communities potentially affected by our activities, with a special focus on the most vulnerable.

- **Recognition of indigenous peoples' rights.** Greenergy is committed to ensuring public and specific recognition of indigenous peoples, in line and defined by international standards, regardless of whether or not they are protected by the laws of the host state.
- **Right to universal access to basic services.** Greenergy ensures full recognition of the right to energy, access to food, water and sanitation, education, health and housing in the communities in which it operates.

- **Rejection of retaliation.** Greenergy does not accept any form of retaliation against any whistleblower, legal threats, intimidation, physical or legal attacks against human rights and environmental defenders in relation to its operations.
- **Recognition of the human right to a clean, healthy and sustainable environment.** Greenergy recognises with reference to Human Rights Council resolution 48/13 of 2021, the promotion of a clean, healthy and sustainable environment.
- **Promotion of local capacities.** Greenergy is committed to promoting local capacity building through cooperation and multilateralism in order to boost local procurement.
- **Communication channels.** Greenergy has established communication channels for stakeholders through which it facilitates the collection and identification of threats to human rights, in order to be able to define possible responses to these scenarios.

3.2.3.- RESPECT FOR HUMAN RIGHTS IN THE VALUE CHAIN (SUPPLIERS AND CUSTOMERS)

3.2.3.1 Commitment to the client

At Greenergy we are committed to respecting the human rights of our customers based on the following commitments:

- **Commitment to security.** Greenergy is responsible for providing a secure and reliable infrastructure of services and products to maintain data protection by preventing any unauthorised access, misuse or loss of data.
- **Commitment to privacy.** Greenergy ensures the correct treatment of personal data thanks to our data protection and privacy policy.
- **Commitment to freedom of expression.** Greenergy works to protect freedom of expression by seeking to avoid or minimise the impact of government restrictions, consistent with national and international laws and standards.

3.2.3.2 Commitment to suppliers

Greenergy is aware of the risk of human rights and environmental violations in its supply chain. This is why we are very committed to our suppliers and contractors, as evidenced by our purchasing policy and procedure, supplier code of conduct, as well as ESG clauses.

In addition to the above, we undertake the following commitments:

- Approval process of our suppliers through the completion of questionnaires with ESG criteria by means of an official supplier management platform.
- Commitment that our suppliers sign and accept the Supplier Code of Conduct in the General Terms and Conditions.

- Conducting ESG audits of selected suppliers against ESG criteria.
- Periodic evaluation of human rights and environmental due diligence exercises of suppliers/subcontractors for different projects in different countries.
- Work with our suppliers to promote good practices in the protection of human rights and the environment.

3.3.- Human Rights and environmental due diligence Process.

In order to ensure that the commitments contained in this document are fulfilled and respected at Greenergy, a due diligence process has been established to facilitate the implementation and monitoring of these commitments.

Based on the due diligence process, Greenergy integrates, identifies, prevents, mitigates, monitors and communicates potential and/or actual adverse human rights and environmental impacts of its activities.

In this way, and through the due diligence process, the objective of having adequate human rights and environmental risk management both in business operations and in relations with the supply chain is met, in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

STEPS IN THE HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE PROCESS

1.- Integration of due diligence into management policies and systems.

Greenergy ha integrado el proceso de debida diligencia en materia de derechos humanos y medioambiente en su operativa diaria, asegurando así el cumplimiento de los principios contenidos en esta política.

2.- Identification and assessment of potential adverse impacts.

Greenergy has put in place appropriate measures to help identify and assess actual and/or potential adverse human rights and environmental impacts arising both from its own activities and from its relationship with its supply chain.

3.- Establishment of measures for prevention, remediation and mitigation of adverse impacts.

Greenergy has implemented adequate measures to prevent or, where prevention is not possible or not immediately possible, to sufficiently mitigate adverse effects that could impact on human rights and the environment.

To this end, Greenergy has established an internal assessment system to prevent adverse impacts and, if materialised impacts are identified, to mitigate and remediate them appropriately.

In addition, as a preventive measure, a complaints channel has been established to report any non-compliance detected, encouraging the participation of individuals and groups to raise concerns about potential human rights or environmental abuses they may have detected.

4.- Monitoring implementation and results.

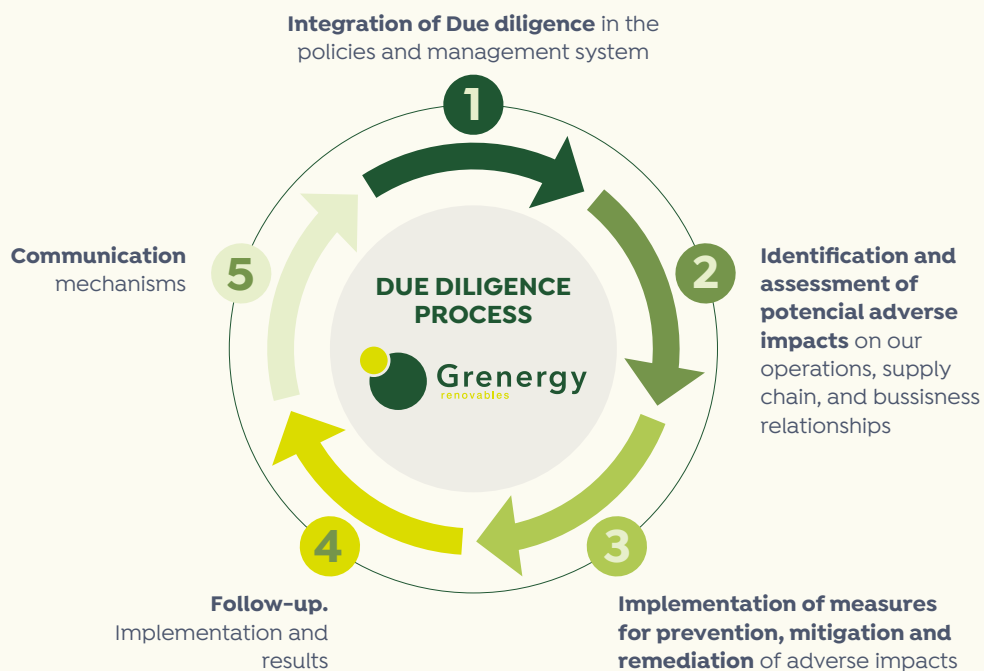
Greenergy conducts regular assessments of both its own operations and its supply chain to monitor the effectiveness of detection, prevention, mitigation and elimination activities of the potential extent of adverse human rights and environmental impacts.

5.- Communication.

Greenergy undertakes to publicly report to stakeholders in its Non-Financial Statements Report on its compliance with human rights, both in the event that it detects any human rights violations and in the event that there is no threat to human rights.

Greenergy assumes the importance of generating dialogue with workers, communities, customers and stakeholders whose human rights may be affected by its actions.

To facilitate communication by any person, employee, or stakeholder of Greenergy, a whistleblower channel has been provided to ensure confidentiality and, if requested by the complainant, anonymity, for the receipt of any communication or concern about any breach of the principles described in this Policy and thus, to put in place the appropriate mechanisms for its effective mitigation, remediation and/or remediation.



4. RESERVATION CLAUSE

GREENERGY and the different companies that make up the same expressly reserve the right to unilaterally modify, update and/or eliminate any matter regulated in this regulation, without, therefore, any condition contained in the same being understood to be consolidated.

5. TRANSITIONAL PERIOD

There is no transitional period for this rule.

6. ANNEXES

Annex No.	Title
1	

7. ABBREVIATIONS AND DEFINITIONS

Abbreviation	Description
M&A	Mergers and Acquisitions
EPC	Engineering, Procurement and Construction
ESG	Environmental, Social, Governance

8. MAJOR CHANGES COMPARED TO THE LAST REVISION

Versión:	Date:	Description of change
1.0	2021	Initial version
2.0	2023	Extending the basic principles Introduction of Due Diligence