

RESPECT FOR HUMAN RIGHTS POLICY

Enerside Energy, S.A. ("Enerside") is a company committed to the continuous improvement of the company's internal processes, as well as to the social and environmental impacts that it generates, in all those areas and locations in which it has activity, presence and / or influence.

Enerside is a company whose economic activity focuses on the development, construction and operation of renewable electricity generation projects, mainly in South and Central America, the Caribbean and Spain. The operation is carried out directly by Enerside or by any company controlled by it in the different corporate forms legally in force ("Enerside Group"). In carrying out its activity, the Enerside Group engages with its own workers, local communities, suppliers, customers, business partners and other groups of interest. As a consequence of its business activity and its projects an impact is generated in the environment, both social, economic and environmental. One of the policy goals corporations is to improve these impacts.

The Corporate Policies contain the guidelines of good practices that govern the performance of Enerside and the companies that are part of the Enerside Group.

In application of the foregoing, the Board of Directors of Enerside is assigned the competence to design, evaluate and permanently review corporate governance and, specifically, to approve and update the Corporate Policies.

Respect for Human Rights is a fundamental part on which the purpose and values of the Enerside Group are based and, in addition, an aspect inextricably linked to the United Nations 2030 Agenda for Sustainable Development. For this reason, the Board of Directors approves this Policy of respect for Human Rights, based on the most demanding international standards.

1. Purpose

This Policy formalizes the Enerside Group's commitment to Human Rights recognized in national and international legislation and defines the principles applied by the Enerside Group to Human Rights due diligence throughout the whole value chain.

The Policy is consistent with:

- i. the Guiding Principles on Business and Human Rights;
- ii. the OECD Guidelines for Multinational Enterprises;
- iii. the principles on which the United Nations Global Compact is based;
- iv. the Tripartite Declaration of Principles on Multinational Enterprises and Social Policy;
- v. the conventions of the International Labor Organization (including Convention 169);
- vi. the Sustainable Development Goals (SDG) approved by the United Nations;
- vii. Enerside's Compliance and Code of Ethics Program;

The foregoing extends to all documents and texts that may replace or complement those previously mentioned.

2. Scope of application

It is applicable to all companies that make up the Enerside Group within the legally established limits.

Notwithstanding the provisions of the preceding paragraph, the subsidiaries may establish an equivalent policy that, in any case, must be in accordance with the rest of the Enerside Group policies.

In the companies in which the Enerside Group is part and in which it does not have control of the same, Enerside will promote that said companies comply with the Enerside Policies. In addition, this Policy is also applicable, as appropriate, to joint ventures, temporary unions of companies and other equivalent associations, when Enerside assumes its management.

3. Basic principles of action

To achieve the objectives contained in this Policy, the Enerside Group assumes as its own the following basic principles of action that should govern its actions in all areas:

- a) Identification of the potential impacts that the business activity of the Enerside Group may generate regarding Human Rights;
- b) To have a surveillance system that identifies those actions with the greatest potential impact of contravention of Human Rights and, in turn, develop mechanisms for the prevention and mitigation of the same and for repairing the impacts in the event that they materialize;
- c) Periodically evaluate, at least annually, the effectiveness of the surveillance system through monitoring indicators. This evaluation will be based on the internal control systems of the Enerside Group;
- d) Publish, on Enerside's corporate website, the results of the periodic evaluations in the annual public information;
- e) Promote a culture of respect for Human Rights and actions aimed at raising awareness among all professionals in all Enerside Group companies;
- f) Have mechanisms for reporting, claiming and resolving possible breaches of this Policy. These mechanisms must be communicated, both to the professionals of the Enerside Group, and to people and organizations outside the organization. and
- g) Adopt, with the shortest possible time and with the greatest forcefulness, the appropriate measures in case of detecting a possible violation of Human Rights, both within the Enerside Group or its suppliers. Likewise, the competent authorities must be informed of this so that they can take the corresponding legal actions when they may be the subject of an administrative or criminal offense.

4. Normative framework of Human Rights

In addition to this Policy, the following are also part of the Enerside Group's regulatory framework on respect for Human Rights:

- a) Social policies that cover different matters directly related to Human Rights, such as Health and Safety, Equality, Diversity and Inclusion or Quality; and
- b) The Purchasing and Suppliers Policy, which includes the Enerside Group's criteria on shared responsibility with its suppliers and throughout the value chain with regards to respect for Human Rights.

The Enerside Group explicitly assumes the commitment to:

- a) Reject child labor and forced or compulsory labor;
- b) Respect the freedom of association and collective bargaining;
- c) Respect the right to move freely within each country;
- d) Not to discriminate for any condition;
- e) Respect the rights of ethnic minorities and indigenous peoples in the places where they carry out their activity;
- f) Respect the right to the environment of all the communities in which it operates; and
- g) Understand access to energy as a right related and linked to other human rights, collaborating with the different Public Administrations in the implementation of protection systems for vulnerable customers and in plans to extend the service to communities that lack access to energy.

5. Control and Evaluation

To achieve the objectives established in this Policy, Enerside has a People Department. The People Department is responsible for implementing this policy and monitoring its implementation based on the objectives and KPIs (Indicators) defined by Enerside.

The Department of People will define the objectives and those in charge of matters related to human rights, for which it will have the support of the Sustainability Committee, in order to guarantee the same regarding the integration and balance of economic, social and economic interests. environment, and that such an integrated approach is achieved. These objectives will be published in the Sustainability Plan and in its respective report.

6. Validity

This Policy was approved by the Board of Directors of Enerside Energy, SA on September 3, 2021.

Tomàs Casanovas Martínez



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