

ANTI - HARASSMENT 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.

Enerside being aware that the human team is its main strategic asset and key to its business success and in the global improvement of all conditions, at the human level and the Environment as a whole, the Board of Directors approves this Anti-Harassment Policy (the "Policy").

1. Purpose

Enerside is committed to establishing and maintaining a healthy and safe work environment for its human team, where the dignity of people prevails as a fundamental value. This Policy ratifies Enerside's commitment to strict compliance with the Compliance Manual and the Code of Ethics and, specifically, with the rejection of abuse of authority and workplace, physical, moral or sexual harassment in any of its aspects.

Through this document, Enerside identifies what is understood by workplace, social and sexual harassment and establishes the investigation and response protocol in the event of detecting any constitutive conduct.

2. Scope of Application

The Policy is intended to involve all Enerside employees in favor of their own colleagues, executives and Enerside partners, as well as with third parties with whom employees establish relationships in the professional field. Likewise, Enerside does not accept these behaviors in their private sphere.

All workers, including middle management and senior management, must be aware of and comply with this Policy and, in the event of incurring any irregular or contrary behavior or action, they will be subject to the corresponding sanctions in accordance with the regulations. in force, the Workers' Statute and the applicable Collective Agreement, without prejudice to other civil or criminal responsibilities that the offender may incur.

3. Objective

Because Enerside is a company committed to the comprehensive protection of people, its workers are expected to act, at least, with the same level of diligence and respect for their colleagues, for third parties with whom a relationship is established professional, as well as the development and enjoyment of its private life.

Enerside is committed to:

- a) Establish a “zero tolerance” action with harassment in all its forms, as well as with respect to any discriminatory attitude, for whatever reason (gender, nationality, disability, personal or physical condition, sexual orientation, age, religious belief, political opinion, etc.), contrary to Enerside's values
- b) Adequately train the staff, especially those who have staff under their charge
- c) Provide the tools to communicate irregular behaviors, safeguarding the confidentiality of those involved
- d) Impose the corresponding disciplinary measures in the event of detecting breaches of this Policy

4. Factual Assumptions

The generic definition of Harassment is established as the performance, by one person against another, of actions, omissions or behaviors that result in harassment, persecution, aggression, physical or moral, or any other type of annoyance that it generates in the person affected discomfort or dissatisfaction.

Harassment can occur between Enerside workers, with or without a work dependency relationship. It can also occur with third parties (suppliers, clients, partners or other people) with whom a professional relationship is established, as well as the development and enjoyment of their private life.

Without considering the following relationship as a numerus clausus, and without prejudice to the fact that some of said behaviors may receive criminal reproach by their perpetrators, the following behaviors are considered Harassment:

- Yelling, bullying or insulting another person
- Assign objectives or projects with objectively unattainable or impossible to meet deadlines, and tasks that are manifestly endless at that time

- Purposely and unequally overloading the rest of the team, with an excessive workload and putting excessive pressure on them
- Threaten or coerce people
- Defame people, spreading malicious or slanderous rumors that undermine their reputation, image or professionalism
- Relegating the level or position of responsibility for no objective reason, offering routine tasks or even no work to do
- Treat in a discriminatory way with the aim of stigmatizing you in front of others
- Withholding information crucial to job performance or manipulating it to mislead you in your job performance, and then accuse you of negligence or professional misconduct
- Ridiculing a person for their work, their ideas or the results obtained
- Invading people's privacy by tapping their mail, their telephone, their documents, cabinets, drawers, etc.
- Steal, destroy or steal items
- Attacking your personal convictions, ideology or religion

4.1.- Workplace Harassment

Workplace harassment or "mobbing" is a form of labor abuse, mainly psychological or moral, characterized by persistent, systematic and continuous harassment of an employee.

In addition to the list of behaviors contained previously in this section, workplace harassment can also consist of recurring comments with bad intentions or exaggerated criticisms about performance, physical appearance, condition, opinion or other, or the performance of an act intended to harm physically or psychologically to the other person or other form of abuse.

4.2.- Sexual Harassment

Sexual harassment occurs when a person takes advantage of a work, personal or service provision relationship to request sexual favors from another who is in the same field, causing the victim an objective and seriously hostile, humiliating and intimidating situation.

Sexual harassment is materialized through any action of siege, harassment, offense, whether expressed verbally or physically with terms, concepts, signs, images that have a sexual, lewd or body exhibitionist connotation, or takes advantage of any circumstance of need or disadvantage of the victim, to one or more people of any sexual condition, without the victim having given his express consent that has the purpose, or produces the effect of undermining the dignity of the person, in particular when it is created an intimidating, degrading or offensive environment.

4.3.- Moral harassment

It consists of vexatious behaviors that threaten the dignity and moral integrity of the person in order to unbalance him psychologically.

Usually, the behaviors can become subtle and imperceptible for the recipient or their environment, but they can result, among other behaviors, in the emission of lies, words, defamations or deformations of reality in order to socially destabilize the person receiving, undermine their self-

confidence and achieve a feeling of helplessness and anxiety that can lead to depression and, in extreme cases, suicide.

This type of harassment can be carried out physically, by telephone and even digital media or social networks.

4.4.- Physical harassment

It consists of constantly and invasively persecuting the victim in order to establish contact against her will, carrying out behaviors such as:

- To Spy
- To Pursue
- To Make phone calls or attempts to contact
- To Threaten
- Violent behavior towards the harassed person, even with the result of aggression

5. Protocol for Investigation and Response to the Complaint

The procedure begins with the notification to the Compliance Committee through the channel that Enerside has established for this purpose: compliance@enerside.com

The Compliance Committee, after the investigation of the case, will transfer the conclusions with a resolution proposal to the People Department.

The complaint may be made by the person allegedly harassed or by any other person who is aware that behavior contrary to this Policy is taking place.

This channel will guarantee the confidentiality of communications and the absence of retaliation as long as they act in good faith. Likewise, the channel will be available for questions or suggestions from any employee.

5.1.- Investigation of the Case

The Compliance Committee will decide if the complaint received is admitted for processing and in this case, it will initiate the investigation process.

The investigation will consist of gathering information and, if necessary, conducting interviews with those affected (complainant, accused and witnesses).

5.2.- Resolution

After the investigation phase, the Committee will present to the Department of People a report with the description of the procedure, the proven results, the conclusion of the case and a resolution proposal.

The Department of People will be in charge of sentencing the case, which may be:

- a) File the complaint due to lack of reason or insufficient evidence
- b) Filing a disciplinary file in the event of clear indications of committing workplace, sexual or gender-based harassment
- c) Filing of a disciplinary file for the commission of other conduct, other than harassment, that could be malicious, offensive or not honest

6. Control and evaluation

The Compliance Committee is the body in charge of acting to prevent unwanted behavior, contrary to the law or this Policy.

Controlling the effective application of this Policy is a function attributed to the Compliance Committee, as well as promoting its knowledge among employees, supervising and ensuring compliance as far as possible, and applying, where appropriate, the corresponding disciplinary measures in accordance with the procedure described, the current regulations, the Workers' Statute and the applicable Collective Agreement, without prejudice to other civil or criminal responsibilities that the offender may incur.

7. Validity

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

Tomàs Casanovas Martínez



p.p. OPEN LEARNING SPAIN, S.L.
Chairman of the Board

Joatham Grange



p.p. LOPTEVI INVESTMENTS, S.L.
Secretary of the Board