

MONEY LAUNDERING AND CRIME PREVENTION 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.

In exercising these responsibilities, the Board of Directors approves this Policy of respect for Crime Prevention and Money Laundering (the "Policy"), which has been prepared taking into account the most demanding international standards.

1. Purpose

This Policy has the purpose of projecting to all professionals, managers and partners of Enerside, as well as to third parties that are related to it, a clear and forceful message that it opposes the commission of any illegal, criminal or any other act of another nature, and that it is willing to combat it and report it in order to prevent a possible deterioration of Enerside's image and reputational value.

Enerside will establish, through the competent bodies, a specific and effective program for the prevention of the commission of crimes (as a set of measures aimed at preventing, detecting and reacting to possible crimes), which will also extend to prevention and control of other fraud, administrative infractions and serious irregularities.

The objective of the aforementioned program is to guarantee the due control that is legally required over its directors, employees and other dependents of the Enerside Group, including the control of potential situations of criminal risk. Likewise, it is also established as an objective the reinforcement of the commitment to fight against fraud and corruption in all its manifestations, including extortion and bribery.

2. Scope of application

This Policy will apply to all professionals, managers, representatives and partners of Enerside. The professionals of the Enerside Group to whom this Policy applies will also comply with the rest of the rules or policies of the countries in which they carry out their activity on behalf of and on behalf of Enerside.

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

This Policy is governed by the following principles:

- a) Integration and coordination of the set of actions necessary to prevent and combat the possible commission of illegal acts by any Enerside professional
- b) Establish the principle of transparency, integrating the different systems developed for the prevention of crimes and correction of fraud, maintaining adequate internal channels to favor the communication of possible irregularities
- c) Scrupulously apply the principle of “zero tolerance” towards the commission of illegal acts and situations of fraud by any Enerside professional, regardless of their hierarchical level and the country in which they work
- d) Apply the criteria established by current legislation and by the Executive Service for the Prevention of Money Laundering (SEPBLAC) in terms of due diligence obligations, information obligations and internal control measures. Specifically, a policy of economic transactions is established, preferably by electronic means and verification of the beneficial ownership of all Enerside partners, as well as third parties with economically relevant relationships
- e) Promotion of self-control processes in the actions and decision-making by professionals, in accordance with the following premises: (i) that the performance is ethically acceptable, (ii) that it is legally valid, (iii) that is desirable for Enerside, and (iv) that the professional is willing to assume responsibility for it
- f) Maintain priority in proactive activities, such as prevention and detection, without prejudice to firmly applying reactive activities, such as investigation and punishment
- g) Investigate any complaint of an allegedly criminal act or fraudulent or irregular act, regardless of its amount, as soon as possible, guaranteeing the confidentiality of the complainant and the rights of the persons under investigation
- h) Seek a fair, non-discriminatory and proportional application of sanctions
- i) Communicate to all Enerside professionals the duty to report any fact constituting a possible criminal offense or fraud or irregularity that they are aware of through the channels that Enerside establishes in this regard
- j) Punish those conducts that contribute to preventing or hindering the discovery of crimes, as well as the violation of the specific duty to inform the control bodies of any breaches that may have been detected

4. Control and evaluation

The control of the application of this Policy corresponds to the Compliance Committee, as well as the development and fulfillment of the program for the prevention of the commission of crimes of Enerside.

For these purposes, the Compliance Committee will have the necessary powers of initiative and control to monitor the operation, effectiveness and compliance of this Policy, ensuring the adequacy of the program for the prevention of the commission of crimes to the needs and circumstances of Enerside at all times.

The evaluation of the application of this Policy corresponds to the Compliance Committee which, at least once a year, will evaluate the compliance and effectiveness of this Policy.

5. 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



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Secretary of the Board