

ANTI-HARASSMENT POLICY

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

Enerside is a company whose economic activity is focused on the development, construction and operation of renewable electricity generation projects, mainly in Latin America, Italy, 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 the development of its activity, the Enerside Group establishes its relationship with its own workers, local communities, suppliers, customers, business partners and other stakeholders. As a result of its business activity and its projects, it generates an impact on the environment, both socio-economic and environmental. One of the objectives of corporate policies is to improve these impacts.

The Corporate Policies contain the good practice guidelines that govern the actions of Enerside and of the companies integrated in the Enerside Group.

Pursuant to the foregoing, Enerside's Board of Directors is empowered to permanently design, assess and review corporate governance and, specifically, to approve and update Corporate Policies.

Being Enerside 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 a human level and in 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 meant by workplace, social and sexual harassment and establishes the investigation and response protocol in the event that any constitutive conduct is detected

2. Scope

This Policy is intended to involve all Enerside workers in favor of their own colleagues, directors and partners of Enerside, as well as with third parties with whom the workers 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 know and comply with this Policy and, in the event of incurring in any irregular behavior or action or contrary to it, they will be subject to the corresponding sanctions in accordance with the regulations in force, the Workers' Statute and the applicable Collective Bargaining 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 towards their colleagues, towards third parties with whom a relationship is established professional, as well as developing and enjoying your private life.

Enerside commits to:

- a) Establish a "zero tolerance" action towards 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) Properly train its staff, especially those who manage other people.
- c) Facilitate the tools to report irregular conduct, safeguarding the confidentiality of those involved.
- d) Impose the corresponding disciplinary measures in the case of detecting breaches of this Policy.

4. Assumptions of facts

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

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

Without considering the following relationship as *merus clausus* and without prejudice to the fact that some of the mentioned behaviors may receive criminal reproach by their originators, the following behaviors are considered harassment:

- Yelling, crushing or insulting another person.
- Assign objectives or projects with objectively unattainable or impossible deadlines, and tasks that are manifestly unfinishable in that time.

- Purposefully and unequally overloading someone as compared to the rest of the team with an excessive workload and putting excessive pressure on him/her.
- Threatening or coercing people.
- Defame people, spreading malicious or slanderous rumors that undermine their reputation, image or professionalism.
- Relegating from level or position of responsibility without objective reason, offering tasks routine or even no work to do.
- Treat someone in a discriminatory manner in order to stigmatize him/her in front of others.
- Withholding information crucial to job performance or manipulating it to mislead you in your job performance, and later accusing you of negligence or professional misconduct.
- Ridicule a person for their work, their ideas or the results obtained.
- Invading people's privacy by tapping into their mail, their telephone, their documents, cabinets, drawers, etc.
- Steal, destroy or remove items.
- Attack someone's personal convictions, ideology or religion.

4.1.- Workplace harassment

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

In addition to the list of behaviors contained above in this section, workplace harassment may also consist of recurrent comments with ill intent or exaggerated criticism about the performance, physical appearance, condition, opinion or other, or the performance of any act intended to harm physically or psychologically to the other person or another form of abuse.

4.2.- Sexual harassment

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

Sexual harassment materializes through any action of harassment, offense, whether expressed verbally or physically with terms, concepts, signs, images that have a sexual, lascivious or corporal exhibitionism connotation, or take 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/her express consent that has the purpose, or the effect of violating the dignity of the person, in particular when creating an intimidating, degrading or offensive environment.

4.3.- Moral Harassment

Moral harassment consists of humiliating behaviors that threaten the dignity and moral integrity of the person in order to unbalance him/her psychologically.

Usually, the behaviors can become subtle and imperceptible to the receiving person or their environment, but they can result, among other behaviors, in the emission of lies, words, defamations or distortions of reality in order to socially destabilize the receiving person, 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 means and even digital media or social networks.

4.4.- Physical harassment

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

- Spy on the victim.
- Pursue him/her.
- Make phone calls or attempts to contact him/her.
- Threaten him/her.
- Violent conduct towards the harassed person, even resulting in aggression.

5. Report Investigation and Response Protocol

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 investigating the case, will transfer the conclusions to the People Department with a resolution proposal.

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

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

5.1.- Instructions of the case

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

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

5.2.- Resolution

At the end of the investigation phase, the Committee will submit a report to the People Department with a description of the procedure, the proven results, the conclusion of the case and a resolution proposal. The People Department will be in charge of making a decision in this regard, which may be:

- a) Filing of the complaint due to lack of reason or insufficient evidence.
- b) Filing of a disciplinary file in the event of clear indications of harassment
- c) Interposition of a disciplinary file for the commission of any other conduct, different from harassment, which could be malicious, offensive or dishonest.

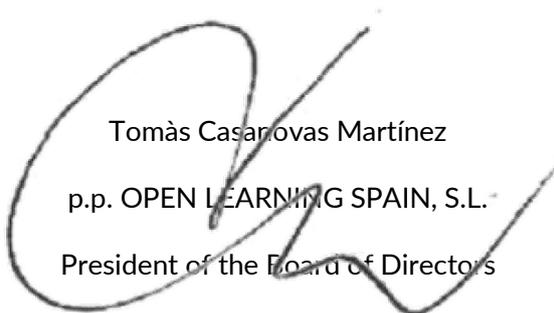
6. Control and evaluation

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

The control of 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 its compliance, as far as possible, and applying, when appropriate, the corresponding disciplinary measures in accordance with the procedure described, 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.

7. Validity

This Policy was approved by the Board of Directors of Enerside Energy, SA on July 29, 2022.



Tomàs Casanovas Martínez
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President of the Board of Directors



Silvia López Jiménez
Secretary of the Board of Directors