

SUPPLIERS AND PROCUREMENT 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.

In accordance with the foregoing and as Enerside intends to comply with current legislation, with the best international practices, social responsibility and correct corporate professional behavior, the Board of Directors has approved this Suppliers and Procurement Policy (“the Policy”).

1. Purpose

The purpose of this Policy is based on the full and strict development and application of the principles, values and obligations described in the Company's Code of Ethics, which includes the action criteria that must govern the relationships that Enerside establishes with its suppliers.

Since the purchasing activity constitutes one of the important functions of the company, Due to its high economic, environmental and social impact, it is considered that this Policy is essential to maintain consistency and effectiveness in Enerside's action principles.

2. Scope

This Policy is applicable to all members of the management team and professionals of Enerside, the subsidiaries, branches and non-Enerside investee companies over which Enerside has effective control.

In those affiliated companies in which Enerside does not hold a dominant position, Enerside will promote, through its representatives in its Administrative Bodies, the alignment of its policies with those of Enerside.

3. Basic principles of action

Enerside establishes the following basic principles of action so that the professional purchasing activity is carried out correctly, in accordance with the criteria and purposes of corporate interests:

- a) In all areas and levels of action, strict compliance with the current legislation and regulations.
- b) Enerside's relationships with its suppliers must be based, at all times, on the criteria of integrity, confidentiality, honesty and transparency. Additionally, the people who carry out purchasing and supply functions must act in accordance with the provisions of the Code of Ethics.
- c) Interactions with suppliers must be long-term oriented, ensuring that the commitments made by the contracting parties are met and allowing traceability of the purchasing process.
- d) At the time of the evaluation, suppliers with a social function and/or with greater geographical proximity to Enerside's activities will be taken into account.
- e) For the selection of suppliers, criteria of competition, objectivity, professionalism, transparency, sustainability, and equal opportunities will be applied.
- f) Suppliers must comply with the Anti-Fraud and Corruption Policy established by Enerside, avoiding any practice of corruption, extortion or embezzlement.
- g) The purchasing processes must ensure the best market price, the quality of the service, in the best conditions and with the minimum environmental impact, preserving the safety and health of the workers and guaranteeing compliance with Enerside's Health and Safety Policy.
- h) The organization maintains a permanent commitment to the environment in each of its business processes according to its established Environmental Policy.
- i) The contracting of goods, products and services will be adjusted at all times to the criteria of need, suitability and cost containment.
- j) The general conditions of the contracts must clearly include the suppliers' commitment to respect and act in accordance with the guiding principles of human rights of the United Nations, the Code of Ethics established by Enerside, its Environmental Policy and Health and Safety Policy. Finally, the inclusion of abusive clauses or those that are contrary to good faith will not be accepted.
- k) Enerside guarantees compliance with the European Data Protection Regulation (RGPD) 2016/679 and organic law 3/2018 on the Protection of Personal Data and guarantee of

digital rights, as well as the rest of the applicable regulations on the matter in each jurisdiction where it is present.

4. Responsible Management

To offer the highest quality to our customers, it is essential to have a solid and reliable supplier registry, which allows us to achieve a high level of business performance. For this reason, Enerside has as its basic principles competition, transparency, equality and non-discrimination, confidentiality, "best value for Money", zero tolerance for corruption and the commitment to establish a framework of collaboration and trust with the Goods and service suppliers.

In this line, the relationship with suppliers must be carried out on the basis that they are business partners of the organization and, therefore, the treatment must be among equals and within the current legal framework. At the same time, the organization prioritizes relations with suppliers that incorporate in their activity:

- a) Criteria of quality, sustainability and regulatory compliance.
- b) Sufficient technical, organizational and risk control capacity.
- c) Proper diligence in their activity regarding the protection of personal data.
- d) The absence of relevant incidents that may affect their professional or commercial reputation.
- e) The promotion of purchases from local suppliers and contractors to promote the development of the business fabric and the creation of employment in the surrounding towns with which it is related.
- f) A Regulatory Compliance management system.
- g) Diligence in its activity with respect to occupational risks, complying with the Enerside Health and Safety Policy.
- h) Firm commitment to the environment and responsible purchasing, pursuing management that minimizes the impact of its operations on the environment and preserves resources natural.
- i) Monitor the environmental performance of suppliers main

In this Policy, Enerside includes the procedures for selecting suppliers and making purchases, seeking to avoid conflicts of interest and obtain mutual benefit, strengthening its ideology of remaining a responsible and sustainable company.

5. Commitment

To meet the objectives set, Enerside undertakes to:

- a) Carry out a pre-selection of suppliers before contracting, taking into account quality, environmental and regulatory compliance criteria.
- b) Select suppliers under clear procedures, objectively and with equal opportunities, avoiding favoritism that harms free competition.
- c) Not be influenced by personal relationships or by the interest of employees when awarding or contracting a service. No Enerside employee will obtain any benefit for the award of a contract, prohibiting the acceptance of any object or incentive that may influence the objective criteria of contracting.
- d) Select those suppliers with conditions that allow, by means of a contract, the punctual fulfillment of the previously established objectives, ensuring the conditions of sale and purchase in a timely manner.
- e) Comply with the term and method of payment stipulated in the contract.
- f) Evaluate those suppliers committed to complying with current legislation, the Universal Declaration of Human Rights, the fundamental conventions of the International Labor Organization, the principles of the United Nations Global Compact and environmental protection.
- g) Know the expectations and needs of the client to offer the highest quality in their services, processes and their final service.
- h) Offer adequate communication that favors management, decision-making and the commercial relationship, promoting profitability for both parties.
- i) Establish mechanisms for continuous improvement and evaluation that help prevent risks, such as the evaluation of suppliers.

On the other hand, Enerside expects its suppliers to:

- a) Commit to the objectives stipulated in the contract, complying with the agreed commitments in a timely manner.
- b) Meet the highest quality standards in all products and services supplied, these being free of defects.
- c) Comply with Enerside's Anti-Corruption and Fraud Policy and contractual agreements, avoiding any practice of corruption, extortion or embezzlement.
- d) Provide their employees with a safe work environment that protects human rights of their employees and treats them with dignity and respect, without incurring in discriminatory practices, forced labor or child hiring, adopting the commitments established in local and state laws, as well as in the Universal Declaration of Human Rights, the fundamental conventions of the International Labor Organization and the principles of the United Nations Global Compact.
- e) Be respectful of the environment, establishing means to avoid leaks and accidental emissions, in addition to using natural resources responsibly and economically, reducing energy consumption and greenhouse gas emissions.
- f) Have implemented a model of organization and management of Regulatory Compliance following the guidelines determined in the fifth paragraph of article 31 bis of the Criminal Code in order to establish the appropriate measures for the prevention of crimes

(including, among others, scams and fraud, punishable insolvencies, bribery, influence peddling, crimes against intellectual and industrial property, the market, consumers and corruption in business...).

- g) Be aware of and accept the Quality and Environmental Policies, made available to all interested parties on the Enerside website, as well as its Code of Ethics, which describes the mission and vision of our organization and the values they have. that govern the daily activity of managers and employees.
- h) According to the established basis, the supplier undertakes to resolve as soon as possible any good and service supplied that does not comply with what is stated above. To verify that these requirements are met, Enerside will periodically evaluate its suppliers, reserving the right to carry out audits and inspections to ensure compliance with this policy, legal regulations and what is stipulated in the contract.
- i) In the event that the aforementioned principles are not complied with, Enerside will seek solutions to remedy the situation. If a satisfactory agreement is not reached, the sanctions considered appropriate will be applied, and the contract with the supplier may be terminated.
- j) Enerside will be receptive to any proposal that involves continuous improvement in its relationship with suppliers, understanding that this is a benefit for both parties.

6. Environment

Enerside is firmly committed to the preservation of the environment in all its activities, establishing sustainable environmental management, the promotion of a low-carbon economy and the conservation of ecosystems as fundamental objectives set forth in the company's Policies. In this sense, in addition to the necessary strategic and management tools, Enerside has an Environmental Policy that allows it to meet this commitment.

7. Health and Safety

Enerside is firmly committed to occupational health and safety in the performance of its activity. In this sense, in addition to the necessary strategic and management tools, Enerside has a Health and Safety Policy that allows it to meet this commitment.

8. Procedures

The Suppliers and Procurement Policy is complemented/reinforced by what is defined in the following Procedures, which include all the activities included in this process in full:

- a) Supplier Homologation and Evaluation Procedure, which will describe the process to be followed and what documentation will be required to homologate any supplier, as well as how it will be periodically evaluated.

- b) Purchasing Procedure, which will fully understand the process to be followed to make any purchase, depending on its type. This procedure will include:
 - o How to make the selection of Suppliers from whom to request an offer.
 - o How the bid requests have to be made.
 - o What will be the approval flow for the validation of purchase requests and validation of final awards.
 - o What will be the process of purchasing supplies and control and management of stock in the warehouse.
 - o What will be the ordering, billing and payment process.

9. Control and evaluation

The control of the application of this Policy corresponds to the Technical Department.

Likewise, Enerside, through its Quality Committee, Sustainability Committee and the Management Bodies, will periodically review the comprehensive management system, detect areas for improvement, and define and implement the action plan to meet the Environmental and Safety Objectives and Health and Safety.

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

10. Validity

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



Tomàs Casanovas Martínez
p.p. OPEN LEARNING SPAIN, S.L.
President of the Board of Directors



Silvia Lopez Jiménez
Secretary of the Board of Directors