



SUSTAINABILITY POLICY



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1 SUSTAINABILITY IN GRUPO IGNIS

Grupo IGNIS (or the "Company") is committed to conducting all aspects of its business in compliance with the highest legal and ethical standards. To this end, it has developed the **Policy** (hereinafter, "Policy") that will enable Grupo IGNIS to drive an agile and fair energy transition through a value-generating operation methodology for its stakeholders.

This Policy is developed based on the Company's mission, vision and values and is aligned with the rest of the Grupo IGNIS internal policies and codes, as well as with the achievement of the Sustainable Development Goals and the ten principles of the United Nations Global Compact.

All employees, directors, officers of Grupo IGNIS or any person acting on its behalf, and in general, all personnel of Grupo IGNIS (hereinafter, the "Employees" or, individually, the "Employee") shall act in accordance with this Policy and all other internal policies and codes that have been previously approved by the Company in order to prevent and detect the commission of any unlawful act.

Grupo IGNIS will make this Policy available to all Employees, undertaking the necessary actions for its communication, implementation, training and awareness.

2 SCOPE OF APPLICATION

The Policy is aimed at Employees in the exercise of their activity, regardless of the contractual modality defining their work and/or professional relationship, or the place where they perform their duties, seeking that they act under the same purpose in terms of human rights and contribute to make these values an integral part of its operational strategy and global value chain.

The Policy must be respected by all Employees and its observance does not exempt from compliance with any other applicable rules in accordance with the legislation in force in the areas where Grupo IGNIS operates.

The provisions of this Policy, as well as the rest of the Company's internal regulations, are subject to the regulations in force in each country. In the event of any discrepancy between this Policy and the other policies of Grupo IGNIS and the regulations in force in each geography, the Company shall make every effort to apply at least the basic criteria governing this Policy proportionally to its sphere of influence. However, in case



of discrepancy, prior consultation with the Grupo IGNIS Sustainability and Compliance Department is required.

3 PRINCIPLES OF SUSTAINABLE ACTION

Grupo IGNIS principles of sustainable action cover three main areas, environmental, social and governance, and govern its business decisions and actions and its relationship with its stakeholders.

The following are considered sustainable action principles of Grupo IGNIS:

3.1 ENVIRONMENTAL AREA

3.1.1 Climate change transition and mitigation

- ▢ **Promoting swift and sustainable energy transition:** To develop and offer our clients technological solutions that accelerate the change towards a low-carbon energy model.
- ▢ **Adaptation strategies:** To assess climate risks and implement measures to protect our operations against the impacts of climate change, ensuring the resilience of our activities.
- ▢ **Mitigation measures:** To reduce greenhouse gas emissions with objectives aligned with the Paris Agreement, promoting the use of efficient technologies and renewable energies.
- ▢ **Energy efficiency:** To promote energy efficiency in our operations and in the solutions offered to our customers, contributing to reduce resource consumption and associated emissions.

3.1.2 Preservation and promotion of biodiversity

- ▢ **Assess biodiversity in early stages:** To integrate biodiversity assessment from the initial stages of projects, avoiding, whenever possible, location in ecosystems of high ecological value, areas of connectivity and key habitats for species conservation.



- **Apply the mitigation hierarchy:** To follow the principle of avoiding, minimizing, restoring and ultimately offsetting impacts on biodiversity, ensuring a "no net loss" approach and prioritizing actions that improve the status and extent of affected species and ecosystems.
- **Implement measures to increase biodiversity:** To carry out specific actions to restore degraded habitats, protect endangered species and promote biodiversity in the Company's facilities and their immediate surroundings.
- **Develop monitoring plans:** To design and implement monitoring plans to evaluate and ensure the preservation and/or improvement of the status of ecosystems and species in the implantation areas.
- **Create collaboration networks:** To establish partnerships with local communities and other entities to restore ecosystems, enhance species conservation and promote biodiversity in areas of operation and influence.

3.1.3 Circular economy

- **Promote technology and digitalization:** To encourage the use of advanced technologies and digitalization to increase operational productivity, optimize processes and reduce material and energy consumption.
- **Extending the useful life of assets:** To plan maintenance activities strategically, prioritizing practices that extend the useful life of assets and reduce the need for new resources.
- **Application of the waste hierarchy:** To implement the waste hierarchy principle in all operations, prioritizing the reduction, reuse and recycling of materials, minimizing the consumption of non-renewable resources.

3.1.4 Pollution

- **Prevent and reduce pollution:** To identify and minimize, whenever possible, polluting emissions to air, water and soil derived from our operations.
- **Responsible management of hazardous substances:** Proper handling, storage and disposal of potentially polluting chemicals and materials, prioritizing environmental safety and improving traceability in our activities.



- **Incident and emergency prevention:** To implement measures to prevent incidents and manage emergency situations related to pollution, ensuring a swift and effective response that minimizes environmental impacts and protects human safety.

3.1.5 Water management

- **Promote efficient water use:** To streamline water consumption in our operations by adopting reuse technologies and water management systems, progressively moving towards greater water sustainability.
- **Protect aquatic ecosystems:** Implement preventive measures to avoid negative impacts on water sources and nearby water ecosystems, in order to preserve the quality and availability of the resource.



3.2 SOCIAL AREA

3.2.1 Working conditions and human rights

- **Compliance with fundamental principles:** To respect and apply the rights set forth in the Universal Declaration of Human Rights and the ILO's Fundamental Principles and Rights at Work, regardless of the country in which we operate.
- **Occupational health and safety:** To promote policies that prioritize occupational safety and employee health, reducing occupational risks and ensuring a safe and healthy work environment.
- **Diversity and inclusion:** To ensure selection and hiring processes that promote equal opportunity, non-discrimination and diversity.
- **Care for human capital:** To offer a work environment that facilitates continuous training, professional development, personal and work conciliation, in a climate of respect and equality.

3.2.2 Due Diligence in the value chain

- **Application of due diligence:** To implement assessment processes to identify, prevent and mitigate risks throughout the value chain, aligning ourselves with the OECD Guidelines and the United Nations Global Compact and European regulations on corporate due diligence in sustainability.
- **Promote responsible practices in the value chain:** To collaborate with suppliers and business partners to promote sustainable practices, ensuring compliance with social and environmental standards.

3.2.3 Relationship with local communities

- **Engagement with local communities:** To promote proactive and transparent dialogue with local communities, ensuring their participation in the design and development of projects.
- **Fostering the local economy:** To promote local hiring and purchasing to generate economic benefits in the communities near our projects.



- **Collaboration in social initiatives:** To participate in cultural, environmental and social projects that respond to local needs and demands.
- **Minimization of negative impacts:** To implement measures to avoid negative impacts on the health, way of life, culture and traditional work of the communities in the areas of operation.
- **Social innovation:** To promote innovation in the energy sector as an driver to promote fundamental rights and social welfare.

3.2.4 Safe and accessible products and services

- **Regulatory compliance:** To ensure that communication and marketing comply with regulations, avoiding misleading advertising and discrimination in the supply of products and services.
- **Data protection:** To establish specific mechanisms to ensure the confidentiality and security of customer and user data.
- **Information for customers and users:** To provide customers and users with the information necessary to fully understand our products and services, being able to make informed decisions and defend their interests.
- **Customer satisfaction:** To implement monitoring systems to measure and improve our customers' satisfaction, adapting our solutions to their needs.



3.3 GOVERNANCE AREA

3.3.1 Organization and composition of the Board of Directors

- **Diversity and balance:** To encourage a Board of Directors formed of diverse profiles, seeking to reflect the Group's reality.
- **Adequate counterweights:** To ensure the presence of directors who provide balance and effective management.
- **Responsible compensation:** To establish compensation policies aimed at attracting and retaining key talent, aligned with strategic and sustainability objectives.
- **Periodic renewal:** To implement a staggered renewal process to maintain continuity and adaptability in the face of environmental challenges.
- **ESG Oversight¹:** Oversight of ESG objectives as part of the Board's responsibilities.
- **Promoting corporate culture:** The Board must act as guarantor and promoter of a corporate culture that reflects the company's values, aligning strategic decisions with these principles.

3.3.2 Business Ethics

- **Code of Ethics:** To consolidate a Code of Ethics and Conduct that promotes values of integrity and responsibility, supported by training and awareness programs at all levels of the organization.
- **Absolute commitment against illegal acts:** To reject any form of bribery or corruption, ensuring access to protected and accessible whistleblowing channels.

¹ Environmental, Social and Corporate Governance



- **Transparent relationship with public administrations:** To establish a professional and collaborative dialogue with administrations, avoiding any undue advantage or favoured treatment.
- **Ethical and corporate culture:** To promote an ethical culture that reinforces the Company's commitment to sustainability, transparency and accountability, integrating these values in decision making and organizational behaviour.

3.3.3 Transparency

- **Clear and accessible information:** To publish accurate, complete and understandable financial and non-financial information, ensuring its alignment with applicable legislation.

3.3.4 Taxation

- **Tax compliance:** To ensure compliance with tax regulations in all jurisdictions where the Group operates, contributing to local economic and social development.
- **Fiscal transparency:** To clearly and publicly report fiscal contributions, aligned with the transparency expectations of European reporting regulations.



4 SUSTAINABILITY MANAGEMENT

Sustainability management in Grupo IGNIS is based on a comprehensive approach that ensures the creation of shared value, continuous improvement and regulatory compliance in all its operations.

4.1 Stakeholder management

Grupo IGNIS prioritizes the relationship with its Stakeholders as a cornerstone of its sustainability strategy, fostering an active dialogue that allows integrating their expectations and concerns in the corporate strategy and in the identification of material issues.

4.2 Goal setting and continuous improvement

Grupo IGNIS defines objectives for its material issues, ensuring their alignment with the corporate strategy and values. In its commitment to continuous improvement, it performs periodic evaluations on the fulfilment of these objectives and designs actions to optimize both processes and results.

4.3 Integration in daily management

The integration of this Policy in the daily management of the Company is carried out through the periodic evaluation of key indicators and the preparation of reports that allow us to identify and apply the necessary adjustments to achieve the established objectives. Likewise, the involvement of all areas is promoted through training, awareness and implication in the achievement of objectives.

4.4 Regulatory compliance

Grupo IGNIS works to ensure compliance with applicable legislation, international standards and voluntary commitments assumed by the organization. This approach reinforces its ethical and transparent management, contributing to the alignment with emerging regulations and long-term sustainability.



5 COMPLIANCE WITH THE POLICY

Employees in the performance of their duties shall not only strive to do what is legally required, but also what is in accordance with the Sustainability Policy of Grupo IGNIS.

The Company will deploy the necessary means to ensure that all persons to whom this Policy applies act with integrity at all times, assuming the following responsibilities, without prejudice to those previously mentioned:

- ▢ Read, know and understand this Policy and all other Grupo IGNIS policies, codes, principles and procedures.
- ▢ Act in accordance with the Policy in the performance of their duties and comply with other Grupo IGNIS policies, codes, principles and procedures.
- ▢ Ensure that Suppliers and other collaborators affected by this Policy and the other policies, codes, principles and procedures of Grupo IGNIS commit to and comply with it.
- ▢ Demonstrate on a daily basis the commitment to the Policy and the other policies, codes, principles and procedures of Grupo IGNIS, as well as set an example to the rest of the collaborators.
- ▢ Avoid any situation that could lead to illegal practices or practices contrary to the basic principles of action contained in this Policy.
- ▢ Collaborate with compliance and auditing bodies by providing the requested information and being faithful to reality .
- ▢ Consult the Sustainability and Compliance Department when doubts arise regarding how to act in accordance with the provisions of this Policy and the other policies, codes, principles and procedures of the Grupo IGNIS.
- ▢ Communicate any incident arising from knowledge or suspicion of any action contrary to this Policy and the remaining policies, codes, principles and procedures of Grupo IGNIS.

Failure to comply with the provisions of this Policy may result in legal action. In the event of a violation of the provisions of these Principles, the Company and its Employees will react immediately in accordance with the framework allowed by the applicable regulations, executing the legitimate measures to which they are entitled.

The response will be proportional to the seriousness of the facts, regardless of the hierarchy of the persons involved in them.



The Board of Directors shall supervise the correct application of the Policy, ensuring its development and effectiveness, and may assign responsibilities to its different committees to monitor its compliance and periodic evaluation, together with that of the relationship processes with the different stakeholders and the areas related to the Group's non-financial risk management.



6 QUERIES AND COMPLAINTS

Grupo IGNIS makes available to all its Employees, as well as to third parties, the Internal Information System (hereinafter, "Consultation and Complaints Channel" or "CCD") so that any interested party may report incidents, consultations, doubts or complaints regarding non-compliance with the commitments of this Policy, as well as other applicable internal and external regulations.

The CCD is available on Grupo IGNIS corporate website for use by all Employees and third parties who require it.

Any Employee who has knowledge or grounds for reasonable suspicion of a breach of this Policy or of conduct or acts contrary to the law should contact the Supervisory and Oversight Body through the CCD.

Grupo IGNIS CCD complies with the requirements and guarantees established in Law 2/2023 on Whistleblower Protection, guaranteeing:

- ▢ Confidentiality of information.
- ▢ Non-retaliation of the informant.
- ▢ Integrity in the traceability and management of complaints and/or inquiries made in good faith.

The Supervisory and Audit Body shall initiate an investigation in the event that it detects indications of the commission of an irregularity contemplated in the Principles or in the applicable regulations and shall notify the informant and, if applicable, the reported person of the initiation of such investigation.



7 VALIDITY AND REVIEW OF THE POLICY

This Policy was approved by the Board of Directors of Grupo IGNIS on 21 November 2024.

Since its approval, the Policy is integrated into Grupo IGNIS regulations, remaining in force until its cancellation, revocation or updating is approved.

The Policy will be subject to periodic review and updating processes in order to be able to adjust it to the applicable regulations at all times, to the social and labour reality and to the Company's context.

In the event of any update to the Policy, the interested parties will be informed in a timely manner, through the communication mechanisms established by Grupo IGNIS.