

Corporate tax policy

Objective

Zelestra's tax strategy consists of ensuring compliance with the tax regulations applicable in all the territories in which it operates, in line with the tax regulations applicable in all the territories in which it operates, in line with the activity carried on in each of these territories and coordinating such compliance by each of the Group companies.

This objective of respecting and complying with tax regulations must be appropriately combined with the achievement of the corporate interest and the generation of value in a sustained manner over time for the shareholders in order to avoid tax risks and inefficiencies in the execution of business decisions.

Compliance with the objective set out in the Zelestra Group's corporate tax policy is governed by the following principles:

- Compliance with the tax rules in the various countries and areas in which the Group operates, paying the taxes for which it is responsible in accordance with the legal system.
- The adoption of tax decisions by the Group companies based on a reasonable interpretation of the applicable regulations and in close connection with the activity of the Group.
- Prevention and reduction of significant fiscal risks, ensuring that taxation is properly related to the structure and location of the Group's activities, its human and material resources and business risks.
- Fostering a relationship with the authorities in relation to tax matters based on respect for the law, loyalty, trust, professionalism, collaboration, reciprocity and good faith, without prejudice to the legitimate disputes that, respecting the preceding principles and in defence of corporate interest, may arise with the aforementioned authorities in relation to the interpretation of the applicable rules.
- Reporting to the management bodies regarding the main fiscal implications of the transactions or matters submitted for its approval when they are a relevant factor for making their decisions.
- Conceiving of the taxes that the Group companies pay in the countries and areas in which they operate as the main contribution to supporting public expenditure and, therefore, one of the Company's contributions.

Best tax practices

Zelestra aims to comply with its tax obligations in all territories where it operates, as well as maintaining an appropriate relationship with the relevant tax authorities.

In order to incorporate the aforementioned general commitment to compliance, development and implementation of good tax practices into Zelestra's Corporate Governance Regulations, the Company has adopted the following practices:

a. In relation to the prevention of fiscal risks:

- Promote practices that lead to the prevention and reduction of significant fiscal risks through internal information control systems.
- Not to use artificial structures unrelated to the Group's business for the sole purpose of reducing its tax burden nor, in particular, enter into transactions with related entities solely to erode the tax basis or to transfer profits to low-tax territories.
- Avoid opaque structures for tax purposes, which are understood as structures calculated to prevent knowledge by the competent tax authorities of the party ultimately responsible for the activities or of the ultimate owner of the assets or rights involved.
- Not to form or acquire companies that are residents in tax havens to elude tax obligations with the sole exception of cases in which it must do so due to an indirect acquisition in which the Company that is a resident of a tax haven is part of a group of companies acquired.
- Reduce conflicts arising from the interpretation of the applicable legislation using tools established for such purposes by tax regulations.

- Adequately assess in advance those investments and transactions that, a priori, may pose a particular tax risk.
 - b. In terms of relations with the Tax Administrations, these must be governed by the principles of transparency, mutual trust, good faith and loyalty, with Zelestra adopting the following good tax practices:
 - Collaborating with the competent tax authorities in detecting and seeking solutions to fraudulent tax practices of which the Company is aware that may occur in the markets in which the Group is present.
 - Providing tax-related information and documentation requested by the competent Tax Authorities as quickly and completely as possible.
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 - Properly informing and discussing with the corresponding body of the competent tax authorities any matters related to significant events of which it is aware to commence, where applicable, the proceedings in question and to promote, to the extent reasonably practicable and without harming good business management, the agreements and conformities within audit proceedings.
 - Regarding information to the Board of Directors:
 - The Company's Audit and Compliance Committee will have the following reporting functions in relation to tax matters.
 - Reporting to the Board of Directors, on the basis of the information received from the person responsible for tax matters, on the tax policies applied by the Company during the financial year and the degree of compliance with the Corporate Tax Policy. Likewise, in the case of operations or matters that must be submitted for approval by the Board of Directors, it will report on the fiscal consequences when they constitute a relevant factor.
 - Reporting to the market regarding compliance with the best tax practices undertaken in this policy:
 - The Company's Annual Corporate Governance Report will report on the effective compliance of Zelestra with best tax practices.
 - Update of best tax practices:
 - The best tax practices are subject to being updated by the Board of Zelestra within the context of its commitment to constantly improve its Corporate Governance Rules.

Communication

The Company's Board of Directors has the duty of coordinating the policies, strategies and management guidelines of the Zelestra Group, acting for the benefit and common interest of all its member companies. The Company's Board of Directors, through its Chairman, Chief Executive Officer and Executives, will promote the monitoring by the Zelestra Group of the tax strategy and the tax principles and good practices set out in the previous sections, as well as those that may be incorporated into this policy in the future.

Monitoring system

The approval of the Corporate Tax Policy is the responsibility of Zelestra's Board of Directors, which, either directly or through a Committee appointed for such purpose, will supervise it, ensure its compliance and periodically review it for its continuous suitability.

The Company shall establish an internal monitoring system that allows the correct implementation of the Policy at all organizational levels, as well as the monitoring of the relevant associated indicators.

Communication and stakeholder engagement

This Policy is communicated and understood within Zelestra and is available on the information and communication channels that the Company makes available to all its stakeholders.

This Policy is publicly available on the Zelestra website.

In order to make it easier for any person to confidentially and anonymously report any breach of the principles described in this Policy, Zelestra's Ethics Line (<https://zelestra.integrityline.com/>) guarantees independence, impartiality and the absence of conflicts of interest throughout the process of receiving, processing and resolving such reports.

Scope

This Policy applies to all the companies of the Zelestra Group, to ZELESTRA CORPORACIÓN, S.A.U., and to those companies in which a majority of the shares, equity interests or voting rights are held, directly or indirectly, or in whose governing or administrative body it has appointed or has the power to appoint a majority of its members, such that it effectively controls the company. In those investees in which the companies of the Zelestra Group do not have effective control, Zelestra shall promote principles and guidelines consistent with those set forth in this Policy.