

SUSTAINABILITY REPORT 2021



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1. A word from our CEO

And so the time has come for us to publish our 2021 Sustainability Report in which the company's non-financial information is made available to all our stakeholders. The purpose of the report is to provide a **transparent insight into all the company's activities** and highlight the initiatives we have introduced to achieve our goals. Our initiatives reflect the principles that underpin our efforts to foster development in the areas of our business operations and, make a positive impact through our activity.

2021 was another year in which the pandemic took its toll not only on health, but also on the economy, the environment and society in general. The latest waves of this pandemic have disproportionately affected the countries in which SOLARPACK is active. The company has consequently had to adapt its operations in order to bring its projects to a successful completion while prioritising the health of its employees and partners.

The financial system has also experienced significant challenges such as supply chain disruption which has affected deliveries on every international market and pushed up the price of raw materials, caused high inflation, etc. SOLARPACK has shown its ability to deliver a robust response to these challenges and has

left no stone unturned in the pursuit of its objective to minimise their impact on its operations.

This is the context in which **SOLARPACK completed the construction of 186 MW and achieved a total installed capacity of 670 MW, up 23% on 2020.** Moreover, by the end of the year, we started the construction of 343 MW and our **Backlog reached 671 MW, up 60% on 2020.**

Operation and maintenance services climbed to 916 MW while asset management services amounted to 747 MW.

Our results reflect our capacity to take these challenges in our stride and, as a result, we ended the year in profit despite the setbacks and the fearsome challenges we faced domestically and internationally.

On the other hand, **one of the most noteworthy events of 2021 was EQT's acquisition of SOLARPACK and the subsequent delisting from the Spanish Stock Market.** It is a particular source of pride for us that, in recognition of the work that SOLARPACK has done since its foundation, EQT submitted a successful public purchase offer which was accepted by 96% of the body of shareholders.



While the company has had to make immediate changes, especially at governance level, the acquisition is testament to SOLARPACK'S strategy and offers significant support for the implementation of new strategic initiatives that will promote faster growth.

In this new era with EQT as a strategic partner, **our commitment to sustainability remains as steadfast as ever.** We aim to do much more than generate economic value: our objective, based on a balanced business model, is to do our best to assist the development of society in general, by continuing to do what we have done for the past 16 years.

In keeping with this commitment, in 2021, **we approved our Strategic ESG Plan for 2021-2023.** The Plan sets out a series of objectives towards which the entire organisation will work. They are designed to ensure that all our day-to-day activities are sustainable. The Plan revolves around

six fundamental axes the ESG strategy, organisation and governance, corporate culture, social action and promotion of sustainable development, managing a sustainable value chain and energy transition and climate change.

True to our purpose to 'Accelerate the transition to clean and affordable energy for all', **our strategy continues to prioritise contribution to society, quality of life and environmental protection.** That is why, in 2021, we made significant progress in terms of our strategic plan for 2021-2023, while remaining true to the company's commitment to Sustainability.

During the year, **as our Health and Safety, Environment and Quality systems were certified in accordance with leading international standards ISO 45001, ISO 9001 and ISO 14001,** we were able to reinforce our commitment to the continuous improvement of processes

and activities, and enhance the expertise of our staff and the capacity of the organisation in these areas.

The commitment and specific actions taken in the interest of Sustainability were recognised by the rating agency ESG Sustainalytics whose rating places us in the low risk level (11.6) and qualifies us as "strong" in all the areas under analysis. We can therefore **claim to be the world's fifth most sustainable renewable energy company,** within Sustainalytics universe.

We will continue to develop the established Plan to improve ESG aspects across every area of activity and at every stage of the value chain with a view to maximising the positive impact we can have on the local communities in which our projects are based.

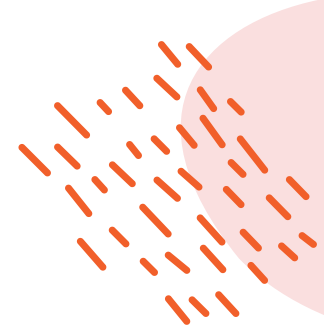
A key component of the Sustainability Plan is the **2021-2023 Social Action Plan**

THE RATING AWARDED BY SUSTAINALYTICS PLACES THE COMPANY IN THE TOP 5 OF RENEWABLE ENERGY PRODUCERS AND QUALIFIES US AS LOW RISK (11.6) AND "STRONG" IN ALL THE AREAS UNDER ANALYSIS

which prioritises economic and social development, the objectives of making clean energy universally accessible and promoting socio-economic development through education in areas where we are active, **according to an allocated budget of more than € 2.6 million during the period.**

Last but by no means least, I would like to **thank our employees for the commitment** they continue to show in the face of their day-to-day challenges. They should know that the success of SOLARPACK would not be possible without them. I would also like to extend my gratitude to our customers and suppliers for the trust they place in our company. They should know that we will continue to strive for excellence in our relations and in the services we provide. I am convinced that, by drawing on our vast experience, our pioneering instincts

and our responsible commitment to society, **we will enthusiastically embrace the new challenges and opportunities that await us in 2022.** The idea is to deliver a solution that is appropriate both for the company and for society as a whole and, at **SOLARPACK, we have the technical capacity, the resources and the determination to make it happen.**



This report on Non-Financial Information is based on the recommendations of the *Task-force on Climate-related Financial Disclosure* (TCFD), and the guidelines of the *Global Reporting Initiative* (GRI) - core option.

It is produced to guarantee compliance with the requirements of Act 11/2018, of 28 December, amending the Spanish Commercial Code, the consolidated text of the Capital Company Act approved by Royal Legislative Decree 1/2010, of 2 July, and Auditing Act 22/2015, of 20 July, in respect of non-financial information and diversity. The Company is also seeking to increase the transparency of aspects related to governance and non-financial risk control, environment and the people who make up the Company, as well as the management of its supply chain and all issues related to the protection of Human Rights and the prevention of corruption and bribery, etc.

This report refers to the 2021 reporting period and its scope covers significant events that occurred between 1 January 2021 and 31 December of the same year. This document, which constitutes the Company's second Sustainability report, is published on an annual basis. The report deals with the activities carried out by SOLARPACK in the countries in which it operates.

Any queries about this report should be addressed by e-mail to info@SOLARPACK.es or by post to SOLARPACK Corporación Tecnológica S.A, Avenida Algorta,16, 48992 (Getxo, Biscay).



2. About this report

3.

2021 in figures



Operational details

670 MW in operation **23** projects under AMS services

929 GWh of energy produced

Financial data

€98,510 thousand economic value generated

€3,297 thousand tax on profit paid

€71,369 thousand Economic value distributed

Employees

266 employees at end of 2021 **5,863** hours of training

16% wage gap

Good governance

4 new policies introduced

31% Women members in the Management Committee

3 Integrated Management Systems implemented ISO 45001 - 9001 - 14001

Society

93% local employees **13** Social Action projects

€364,578 donated to non-profit foundations

Environment

€371,121 allocated to environmental initiatives

2,982 tCO₂ Emissions produced

658,481 tCO₂ Emissions avoided

SOLARPACK'S OPERATIONS

At the end of 2021, SOLARPACK had **670 MW (545 MW at end of 2020) in projects in operation, 343 MW (192 MW at end of 2020) under construction and 8,050 MW in development (8,477 MW at the end of 2020)**. The geographic distribution of these megawatts were as follows:

3,832
MW In America

2,900
MW In Europe

987
MW In Africa

1,345
MW In Asia

Furthermore, by 31 December 2021, SOLARPACK was providing **operation and maintenance services for projects totalling 916 MW and 747 MW of asset management in the service provision stage**.

The economic value generated has contributed to the creation of wealth in the communities and countries where the Company operates. It is calculated on the basis of cash flow. It includes personnel costs and operating expenses, payments to capital providers and to the different governments, as well as investments made in the communities.

In 2021, SOLARPACK distributed a total of € 71,369 thousand (€ 130,138 thousand in 2020). **of which 46% (59% in 2020) were related to operating expenses**.

As for its financial results, SOLARPACK ended the 2021 with a pre-tax profit of (-€ 11,442 thousand) (€ 526 thousand in 2020), and paid a total of € 3,297 thousand in profit tax to the Tax Authorities (€ 2,439 thousand in 2020).

In view of the business activity's impact on the economy, SOLARPACK generated economic value which amounted to € 98,510 thousand (€ 150,799 thousand in 2020), of which € 97,063 thousand (€ 149,103 thousand in 2020), i.e. 98.5% (99% in 2020), relates to turnover. The remaining 1.5% relates to interest from financial loans, dividends from share packages or direct revenue from assets.

The pre-tax profit and tax on profit are presented according to country:

PROFIT(LOSS) BEFORE TAXES

| <i>Thousands of EUR</i> | 2020 | 2021 |
|---------------------------|------------|-----------------|
| Spain | 12,722 | 11,895 |
| Peru | (2,784) | 8,673 |
| Chile | 4,399 | (5,770) |
| India | (495) | 2,774 |
| Malaysia | 801 | 319 |
| Colombia | (237) | (280) |
| United States | (336) | (699) |
| Singapore | (17) | (14) |
| Uruguay | 199 | 110 |
| Consolidation adjustments | (13,726) | (28,450) |
| GROUP TOTAL | 526 | (11,442) |

TAX ON PROFITS

| <i>Thousands of EUR</i> | 2020 | 2021 |
|-------------------------|--------------|--------------|
| Spain | 1,467 | 445 |
| Peru | 147 | 62 |
| Chile | 823 | 2,585 |
| India | 0 | 33 |
| Malaysia | 0 | 163 |
| Uruguay | 2 | 10 |
| GROUP TOTAL | 2,440 | 3,297 |

The organisation received the following grants according to country:

GRANTS RECEIVED

2020

Spain 14
Thousand of EUR

TOTAL 14
Thousand of EUR

2021

Spain 0
Thousands of EUR

TOTAL 0
Thousands of EUR

4.

SOLARPACK'S value proposition

Business model and geographic presence

Purpose and values geared towards the challenges of the future





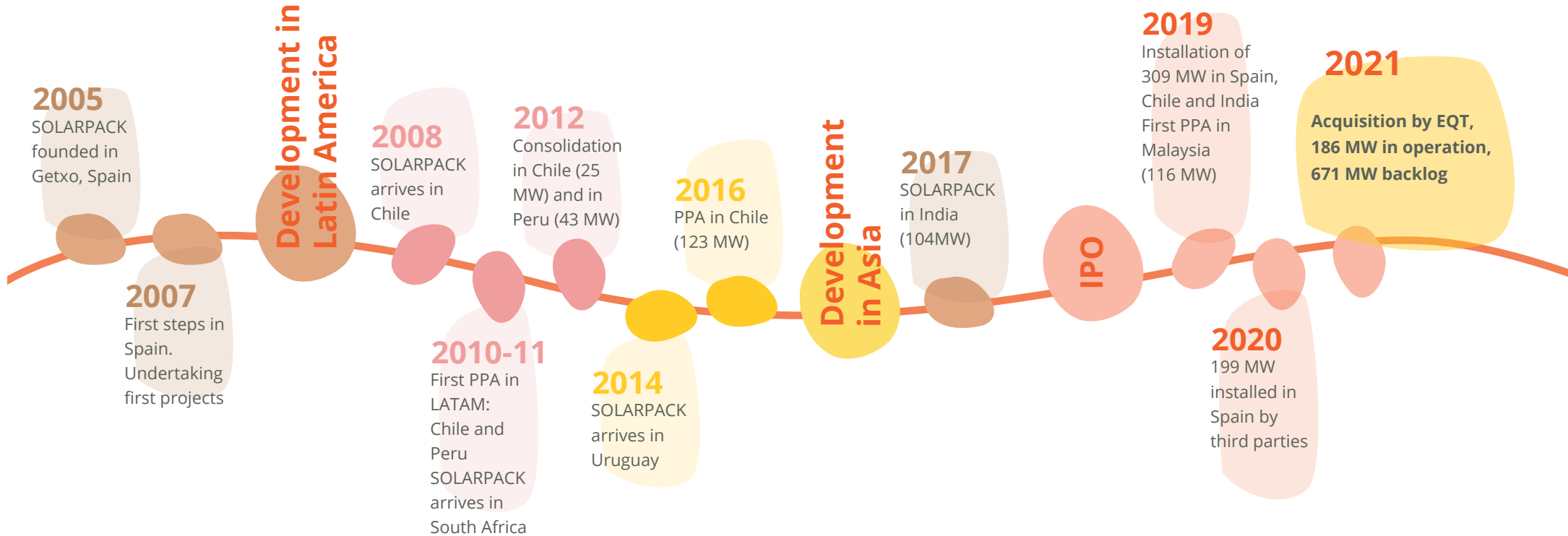
4.1. Business model and geographic presence

SOLARPACK is a multinational company established in Getxo (Spain). It specialises in the development, construction and operation of large-scale photovoltaic solar projects and has a foothold on the European, American, Asian and African markets. In these respective markets, SOLARPACK operates out of **offices located in Getxo and Seville (Spain), Santiago de Chile (Chile), Bogotá (Colombia), Lima (Peru), Atlanta (USA), New Delhi (India), Kuala Lumpur (Malaysia) and Johannesburg (South Africa)**; moreover, it undertakes operation and maintenance (O&M) projects in Uruguay.



Since SOLARPACK was formed in 2005, its business activity has predominantly focused on **three key areas: the development and construction of projects, power generation and the provision of operation and maintenance/asset management services in operational plants.**

SOLARPACK'S approach is based on a model of profitable growth, underpinned by a geographic diversification strategy and the integration of all activities related to the development, construction and operation of photovoltaic plants.



SOLARPACK analyses the feasibility of every project by reviewing the various financial, technical and environmental risks that may materialise at any stage of execution and operation. It is therefore able to identify the corresponding risks and introduce appropriate corrective or preventive measures. For further information, see section 6.3.1 Overall Risk System.

SOLARPACK was one of the first companies to focus exclusively on the development and generation of photovoltaic power in Spain and blazed a trail on a number of the other markets in which it is currently active. **The Company's business activities are currently split into three divisions:**



DEVCON *Development and Construction*



SVCS *Services*

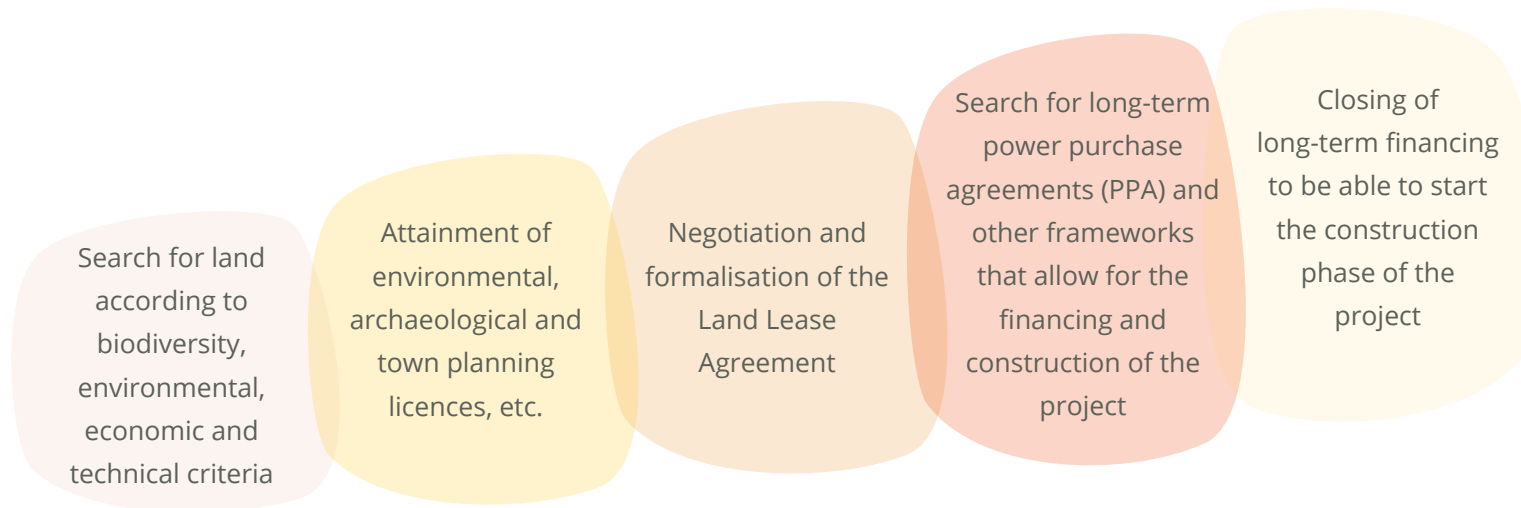


POWGEN *Power Generation*



DEVELOPMENT AND CONSTRUCTION - DEVCON DIVISION

DEVCON is responsible for the development and construction of photovoltaic projects. This stage of the project involves different phases: Firstly, SOLARPACK identifies suitable land for the construction of these plants according to several criteria (environmental, social, legal and financial), the site's proximity to the electricity grid, etc. The development process is not only about making sure that the land and connection point are suitable, but also obtaining all the permits and licences required to construct and operate a photovoltaic plant. Moreover, for the purposes of financing the project, it is necessary to secure agreements for the long-term sale of energy, which often involves PPA with solvent counterparties. On this basis, it is possible to structure and finalise financing arrangements.



Once these prior steps have been taken, SOLARPACK launches the engineering, procurement and construction (EPC) phase. SOLARPACK undertakes the highly technical tasks of the EPC phase for projects that will be managed by the company (Build & Own), for projects that will be sold to third parties upon completion (Build & Sell), and for the projects of other companies whose development phase has taken place without the intervention of SOLARPACK.

| <i>As of 31 December</i> | 2018 | 2019 | 2020 | 2021 |
|--|-----------|------------|------------|------------|
| Projects commissioned during the period | 20 | 309 | 199 | 186 |
| “Build and Own” Projects | - | 288 | 0 | 126 |
| Other projects | 20 | 21 | 199 | 60 |

In 2021, projects totalling 186 MW (199 MW in 2020) were commissioned in the DEVCON division, of which 126 MW (68%) were Build & Own.

DEVELOPMENT AND CONSTRUCTION - DEVCON DIVISION

Projects in the development phase are classified into three groups according to the progress that each one has made; this classification is then used to determine the project's likelihood of success:

PROJECTS IN THE DEVELOPMENT PHASE

| CLASSIFICATION | PROBABILITY | DESCRIPTION |
|---------------------------------|---------------|---|
| IDENTIFIED OPPORTUNITIES | 10-30% | A preliminary viability analysis has been produced |
| | | INTERNAL PROJECTS |
| | | <ul style="list-style-type: none"> • They have contractual or legal rights related to the control of land and inter-connection rights • There is at least a 50% chance of obtaining the necessary permits |
| PIPELINE | +50% | <p>PROJECTS FOR THIRD PARTIES</p> <ul style="list-style-type: none"> • Request for tender to act as an expert provider and for which the Company is on a process short-list |
| | | <ul style="list-style-type: none"> • A PPA is in place • Applicable PPA secured. As preferred bidder, the Company is making preparations for the implementation of the agreement • Non-recourse financing secured for the project without the need for a PPA • <i>Build & Sell</i> Projects • Project with EPC agreement |
| BACKLOG | +90% | |

By the end of 2021, SOLARPACK had 4,987 MW in Identified opportunities, 2,392 MW in Pipeline projects and 671 MW in Backlog projects.

SOLARPACK also had 343 MW in the construction phase.

| <i>As of 31 December</i> | 2018 | 2019 | 2020 | 2021 |
|---------------------------------|--------------|--------------|--------------|--------------|
| Identified Opportunities | 1,826 | 4,724 | 4,938 | 4,987 |
| Pipeline | 1,112 | 1,609 | 3,120 | 2,392 |
| Backlog | 362 | 138 | 419 | 671 |
| In construction | 144 | 350 | 192 | 343 |
| TOTAL | 3,444 | 6,821 | 8,699 | 8,393 |

In 2021, SOLARPACK had a total of 8,393 MW in projects managed by the DEVCON division.

SERVICES – SVCS DIVISION

The SVCS division provides O&M services for internal and third-party projects, as well as administrative, financial and asset management services.

TECHNICAL OPERATION AND MAINTENANCE SERVICES

Its tasks include monitoring and supervision, inspections, preventive maintenance of plants, repair and replacement of plant equipment, and incident response. These services are coordinated at SOLARPACK'S remote control centre based in Getxo (Biscay) and executed by plant operators.

ADMINISTRATIVE AND ASSET MANAGEMENT SERVICES

Provision of marketing, accounting, financial, tax and corporate services for photovoltaic plants in operation. This service ultimately seeks to guarantee regulatory compliance, to advise customers on optimised plant operations, to refinance senior debt and to oversee the day-to-day management and optimisation of PPA.

SOLARPACK MANAGES 916 MW IN OPERATION AND MAINTENANCE AND 747 MW OF ASSETS IN THE SERVICE PROVISION STAGE

As of 31 December

| | 2018 | 2019 | 2020 | 2021 |
|---|------|------|------|------|
| Projects involving O&M services (in MW) | 160 | 377 | 742 | 916 |
| Projects involving asset management services (in MW) | 330 | 578 | 694 | 747 |



POWER GENERATION – POWGEN DIVISION

Once the DEVCON division completes the construction of the solar PV plant, the POWGEN division assumes its operation, which primarily involves the **generation of income by selling the electricity produced by PV plants under PPA or other sales models, including regulated schemes and spot market sales.**

Income from this division depends on two fundamental factors: the sale price of electricity and the quantity of energy produced by the plant. Our energy buyers include government and state agencies, such as the national grids of Spain, Chile and Peru, and state distribution companies in India, Chile and Malaysia. Private companies, such as the Chilean

mining companies of Collahuasi and Codelco, also purchase the energy we produce.

The projects are structured with SPV according to which the assets and liabilities of each project are isolated. This approach enables *Project Finance Debt* to be secured, the primary advantage is that no guarantees are required other than those of the project itself.

| <i>As of 31 December</i> | 2018 | 2019 | 2020 | 2021 |
|--------------------------|------|------|------|------|
| TOTAL MW | 252 | 417 | 545 | 670 |
| Attributable MW | 141 | 345 | 450 | 575 |

POWER GENERATION

| <i>As of 31 December</i> | 2018 | 2019 | 2020 | 2021 |
|---|------|------|------|------|
| Energy generated during the period. (on a proportional basis, In GWh) | 240 | 305 | 863 | 929 |

OUR PURPOSE AND VALUES

SOLARPACK strives to universalise access to clean energy, on the understanding that this kind of energy is a driving force for development and environmental sustainability, and because it believes in the positive impact it has on the well-being of all people.

With this goal in mind, SOLARPACK defines its corporate purpose, expresses its aspirational aims and maps out a clear path for its business activities, while instilling a real sense of purpose into its day-to-day operations and the organisation as a whole. SOLARPACK'S stated purpose expresses the way in which it can help to tackle global challenges by creating and sharing value with and for all stakeholders.



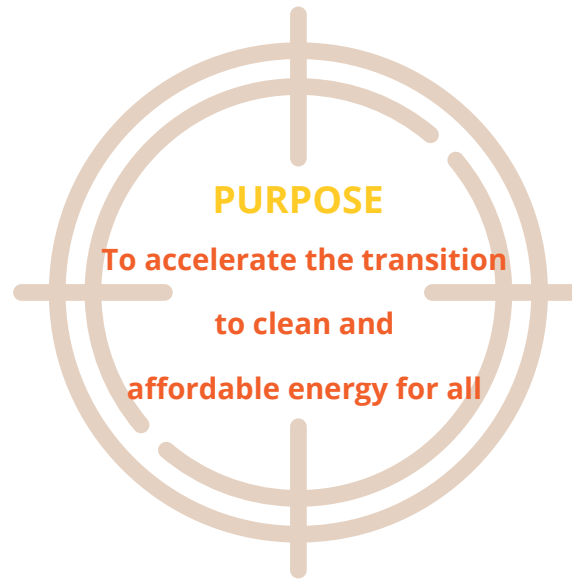
This is the company's statement of intent and the driving force behind the commitments it makes and the goals it aspires to achieve. In short, it lies at the very heart of everything SOLARPACK does.

4.2. Purpose and values geared towards the challenges of the future



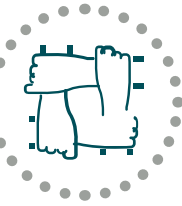
This purpose is sustained by the company's values which underpin our activities, create a space in which diversity can prosper, and help SOLARPACK to fulfil its purpose. **These values shape individual and collective behaviour and reflect the relevance not only of the activities SOLARPACK undertakes, but also of the procedures it implements to carry them out.**

The long-term corporate success of SOLARPACK, which involves optimising its social impact, will depend on its ability to incorporate this purpose and these values into its corporate strategy and operating model. **These values are a source of motivation and inspiration for the company as they underscore the importance of the work it does and define the positive impact that SOLARPACK can have on the world.**



Integrity

We always do the right thing and keep our word. We are honest, trustworthy and reliable. All this in an inclusive environment, where we treat all people as we would like to be treated



Openness

We challenge the established and are curious to know and explore new possibilities. We encourage ingenuity, innovation, and creative thinking in everything we do



Agility

Speed matters. We are bold in our approaches and cultivate a sense of anticipation and initiative to give the best response, quickly and effectively, to our customers



High Performance

We pursue excellence in all our activities, with effort and dedication until we achieve it. By working as a team and sharing information we achieve the highest standards in everything we do and confirm this with positive results for all our stakeholders. It is our way of life and the engine of long-term competitiveness



OUR VALUES

SOLARPACK'S ACHIEVEMENTS IN 2021

The pandemic caused by COVID has been an added difficulty to SOLARPACK's performance during 2021. In November 2021, as SOLARPACK was delisted from the Spanish Stock Market, it started the implementation of a large-scale internal transformation. However, during the year, the company was able to make significant progress in respect of its 2021 Strategic Plan, completed projects and successfully introduced new procedures.

SOLARPACK is the world's fifth most sustainable renewable energy company



SOLARPACK took part in the Sustainalytics ESG Risk rating which measures the extent to which a company implements ESG and good governance strategies.

SOLARPACK'S rating of 11.6 places the company in the TOP 5 of Renewable Energy Producers and the TOP 8 of Sustainalytics Utilities.

This feat is a measure of the progress that the company has made in the management of environmental, social and governance aspects and suggests that it is well on its way to becoming a sector leader in this respect. For further information: [link](#)

SOLARPACK is ISO certified

In 2021, the company focused on the introduction of several integrated management systems in Spain: **ISO 9001: Quality System; ISO 14001: Environmental System; ISO 45001: Health and Safety System** SOLARPACK has introduced the processes and deployed the resources required to improve performance, increase efficiency, enhance consumer services and maintain high standards in service quality.



SOLARPACK is acquired by



In November 2021, EQT, a Swedish fund, acquired SOLARPACK for € 880 million. As a result, the company was delisted from - and cease trading on - the Spanish Stock Market in early 2022. As a consequence, SOLARPACK will implement a structural transformation involving a considerable investment and capitalisation.

SOLARPACK updates its Compliance processes

As a way of ensuring that crime prevention mechanisms are fit for purpose, and setting in stone the company's ethical principles, the following documents have been approved and implemented:

- Code of Ethics
- Code of Ethics for Suppliers
- Anti-Corruption and Anti-Fraud Policy

SOLARPACK extends its PROJECTS

- 252 MW project awarded in Colombia
- Construction of 186 MW in Malaysia, Chile and Spain
- Started the construction of 343 MW project in Spain and Chile, 289 MW of which are for third parties

WHAT THE FUTURE MAY HOLD

Economic outlook

The economic outlook of every industry, including the renewable energy sector, will inevitably be linked to the pandemic caused by COVID. The pace of global recovery will vary according to the level of a country's access to vaccines: countries will either be able to wait until business returns to normal at the end of the year (almost all advanced economies) or face a spike in positive cases and a rise in the number of COVID victims. However, recovery is not assured even in countries with very low infection rates while the virus spreads freely in others.

The global economy is expected to grow by 4.9% in 2022 according to forecasts published in October 2021 by the International Monetary Fund¹, i.e. down 0.1 percentage points on the forecasts from July 2021. The downward revision reflects a downgrade for advanced economies - in part due to supply disruptions - and for low-income

developing countries, largely due to worsening pandemic dynamics.

This is partially offset by stronger near-term prospects among some commodity-exporting emerging market and developing economies. Rapid spread of Delta and Omicron and the threat of new variants have increased uncertainty about how quickly the pandemic can be overcome. In Latin America, a market on which SOLARPACK is active, the FMI predicts (October 2021) that, while the economic recovery is underway, the pandemic still casts shadows on the region. GDP is projected to grow by 3% in 2022 but will not catch up with pre-pandemic trends in the medium term as persistent weakness in labour markets raises risks of scarring in the longer term.



¹[Regional Economic Outlook \(imf.org\)](https://www.imf.org/)

WHAT THE FUTURE MAY HOLD

Sectoral outlook

According to the World Economic Forum² (WEC) and its ranking of the 10 most severe risks on a global scale, **the most concerning risks are climate action failure, natural disasters and biodiversity loss, followed by social risks such as social cohesion, pandemics and geopolitical instability.**

On this basis, and in respect of the renewable energy sector, **the outlook is positive** in view of the need to counter these risks, and the increased investment in this area for the same reason. In short, the sector is presented with an opportunity due primarily to the fact that the very essence of its activities involves halting climate change through the decarbonisation of energy production.

In turn, *Bloomberg New Energy Finance* (BNEF³) analysts estimate that the 200

GW mark of new global photovoltaic capacity should be surpassed this year and **the price of photovoltaic modules is expected to fall by 15%**, which will give further impetus to these projects.

In Europe, **analysts predict a substantial increase in power purchase agreements (PPA)** for photovoltaic systems. They named Poland, Denmark and Germany as countries in which this type of agreement will flourish this year. This will hopefully be the case for Spain once the fog of political uncertainty lifts. In the EU, with 1.4 GW in 2021, almost 72% of PPA photovoltaic projects have been connected to the network. However, temporary market restrictions in September halted market momentum to a certain extent. **BNEF anticipates that, between 2022 and 2025, new photovoltaic plants with PPA totalling 13.1 gigawatts will be commissioned in Europe.**

Demand for photovoltaic energy is not the only thing on the rise. **The number of installations combining photovoltaic energy and storage will also double this year** according to analysts' forecasts. The BNEF database shows that 278 of these plants are now operating around the world and have an installed photovoltaic capacity of 12.5 GW and storage systems with production of 2.7 GW and capacity of 7.7 GWh. China and the United States are the lead.

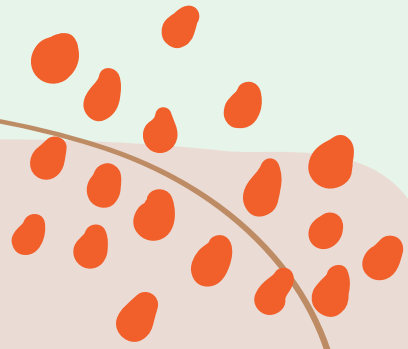
In Spain, the targets set out by the Ministry for Ecological Transition (MITECO) in the National Integrated Energy and Climate Plan (PNIEC) 2021-2030 establish a scenario in which the number of photovoltaic installations will continue to grow year by year. It is therefore reasonable to suggest that the PNIEC will increase GDP in the coming years, in light of the positive impact that renewable investments have,

while improving efficiency across supply networks and savings.

In light of the current economic and social environment, SOLARPACK does its bit by mitigating a number of the 10 most severe risks identified by WEC: both environmental risks such as climate action failure or human environmental damage, and social risks such as social cohesion erosion. The measures introduced by SOLARPACK involve recruiting local human resources for its projects and taking part in a range of social initiatives.

²Global Risks Report 2022 reveal top threats - what can we do? | World Economic Forum (weforum.org)

³Solar - 10 Predictions for 2022 | BloombergNEF (bnef.com)



5. Sustainability as a cross-cutting issue

Our Strategic ESG Plan

Our relationship with stakeholders

Materiality Analysis

2030 Agenda





29,132.74
32,613.85



35,729.4
 22,479.6

5.1. Our 2021-2023 Strategic ESG Plan

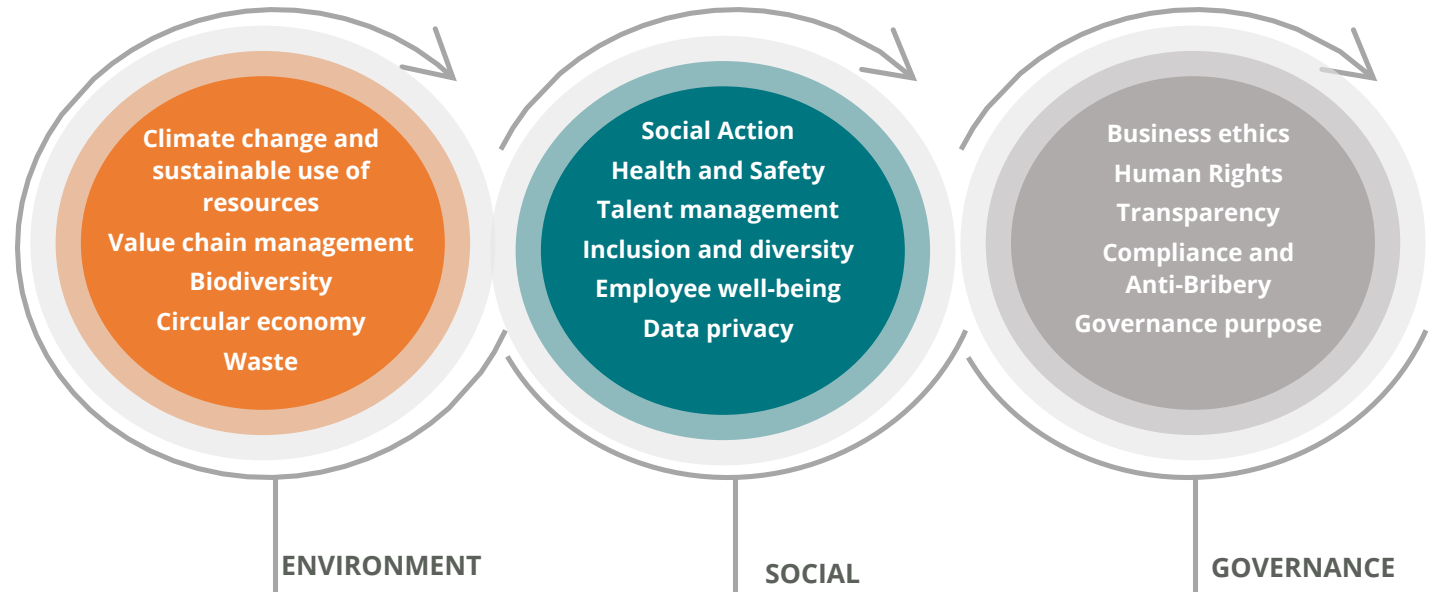
SOLARPACK was one of the first companies to focus exclusively on the development and construction of photovoltaic power plants in Spain and blazed a trail on a number of other markets in which it is currently active.

Despite its activities being 100% sustainable, the Company wants to go a step further and aspires to become a beacon of sustainability in the sector.

In its 2020 Sustainability Report, SOLARPACK highlighted its unwavering commitment to ESG and the considerable progress it had made during the year. In 2021, in its pursuit of excellence, **SOLARPACK launched its new 2021-2023 Strategic ESG Plan which is woven into the fabric of its business model and underpinned by its purpose and values.**

The primary source of information for the Strategic ESG Plan was the materiality analysis of the internal and external governance, social and environmental factors deemed to be most relevant by all the company's stakeholders.

SOLARPACK factors sustainability into the Company's strategy based on the following aspects:



OBJECTIVES OF THE 2021-2023 ESG PLAN

1. To become a **beacon** of sustainability in the renewable energy sector.
2. To respond to the **needs and expectations** of its **stakeholders** and to the **demands** of future **investors**.
3. To factor **ESG considerations** into all areas of activity and into the **business strategy** in order to overcome current environmental and social challenges.
4. To adopt best practices and remain ahead of the regulatory curve in order to control **potential risks** to reputation, climate risks, etc. and to deliver a **robust response to future challenges**.

The 2021-2023 Strategic ESG Plan identifies 6 strategic axes around which the lines of action are able to coalesce

1. ESG Strategy

To produce a particular ESG management model that promotes the incorporation of sustainability into the Company's strategy. To establish lines of communication and distribute the ESG management model to stakeholders with a view to addressing needs and expectations, also in terms of sustainable finance.

- Framework
- Stakeholders
- Sustainable finance
- Reporting

2. Organisation and governance

In pursuit of ESG excellence, SOLARPACK will produce governance, organisation and risk management models underpinned by considerations of sustainability, to prepare the business for future global challenges.

- Governance Structure
- Risk management and compliance
- Business ethics

3. Responsible corporate culture

To foster a responsible and inclusive corporate culture in which all employees feel comfortable. The ability of SOLARPACK to deliver a robust response to the challenges of the future will depend largely on this initiative.

- Attracting and retaining talent
- Equality and diversity
- Health & safety training

4. Social action and promotion of sustainable development

To make a positive global impact particularly in communities in which we operate, by promoting and introducing a programme of social measures underpinned by our purpose and our commitment to the Principles of the Global Compact, the 2030 Agenda and the Sustainable Development Goals which we hold in extremely high regard.

- Social action and relations with local communities

5. Managing a sustainable value chain

To build an ESG mechanism that promotes a sustainable value chain. Such a mechanism will be central to ensuring that the Company and its stakeholders (suppliers or customers) follow suit.

- Supply chain
- Customers

6. Energy transition and climate change

Adaptation to - and the mitigation of - climate change present a whole range of opportunities for the industry in which SOLARPACK operates. That is why the Company must continue to advocate environmental sustainability.

- Environmental management
- Climate change and sustainable use of resources
- Circular economy
- Biodiversity

Objectives

Lines of action

The various governing bodies have played a key role in the planning, introduction and monitoring of the ESG Strategy, for instance the Board of Directors approved and continuously monitors the progress made in this field.

While information about the activities of the various points is provided in the corresponding sections, the following initiatives of the first axis (ESG strategy) are particularly notable: emphasis on the operational incorporation of sustainability, the forging of alliances with various associations that champion sustainability or the review and update of materiality analysis, etc.

In addition to the steps taken to improve performance, **SOLARPACK and its governing bodies have improved ESG reporting in all its processes**, having this report verified by a third party and participating in specific ratings such as Sustainalytics.

SUSTAINABLE FINANCE

In the interest of sustainable finance, and with a view to establishing a global financing framework, **SOLARPACK has created a sub-committee, which reports to the ESG Committee, to oversee the general governance of its green financing structure. The committee monitors market guidelines for sustainable finance products and shapes the Group's financing strategy in view of these guidelines. It is specifically responsible for:**

- **Approving the eligibility of projects for the Eligible Project List**
- **Reviewing the projects of the Eligible Project List based on established assessment criteria**
- **Approving the annual report for investors**
- **Reviewing the eligibility criteria to reflect any change in respect of the Group's ESG strategy and initiatives, and any change in market standards and the selection of criteria**





In a bid to guarantee compliance with its obligations towards stakeholders and the local community, the Company has updated the Corporate Social Responsibility Policy.

This Policy **was approved by the Board of Directors in 2021 and guides the activities of SOLARPACK to a sustainable business management model which prioritises the interests of stakeholders.** This Policy is communicated and understood within the organization. It is available via the reporting and communication channels that the Company makes available to all its stakeholders.

The general principles and foundations set out in this Policy are developed and specified in other specific corporate policies that address certain needs and expectations of the Company's main stakeholders and which further develop the specific commitments in such areas. Information on the various regulatory instruments is made available to all stakeholders in section 6.2 Regulatory Instruments.

THE GENERAL SUSTAINABILITY POLICY EMANATES FROM ITS CORPORATE PURPOSE AND VALUES

5.2 Our relations with stakeholders

COMMITMENT TO STAKEHOLDERS

Transparency and participation

GOVERNANCE COMMITMENTS

Compliance with current legislation

Responsible taxation

Best practices in corporate governance

Risk and opportunity management

Ethical development of operations

Promotion of sustainable development

ENVIRONMENTAL COMMITMENTS

Environmental management and sustainability

Protection of resources

SOCIAL COMMITMENTS

Favourable Labour Framework

Talent promotion

Fostering diversity and equality

Looking after people

Promotion of social action

Protection of Human Rights

Responsible Value Chain

These principles and any related potential risks are identified, assessed and monitored in accordance with SOLARPACK'S Risk Management and Control Policy, as outlined in section 6.3 Risk management and compliance.

In 2021, **SOLARPACK also approved a Code of Ethics** which sets out the general ethical principles and general rules of conduct applicable to the relationships between all employees, executives and Board members, on the one hand, and the company's stakeholders, on the other.

While employees remain the Company's most important asset, SOLARPACK always has the best interests of all its other stakeholders at heart. Its supplier management system includes an approval procedure based on environmental, social and governance criteria.

SOLARPACK also considers its suppliers, contractors and external partners to be important members of its stakeholder group and key to the success of the

company's objectives. In 2021, the Board of Directors **approved a Code of Ethics for Suppliers based on its own Code of Ethics. Under the Code, suppliers, contractors and partners are expected to embrace the values of SOLARPACK'S corporate culture and to adopt best practices**, while complying at all times with internationally accepted standards in respect of Transparency and Corporate Ethics, Human and Social Rights, Health & Safety, Quality and Environment.

Another important stakeholder for the Company are local communities. In order to prioritise local interests and needs, **SOLARPACK has devised a community relations programme** to address issues such as the availability of open communication channels with communities, and a **Social Action Plan** to ensure that its operations have a positive impact on local communities.

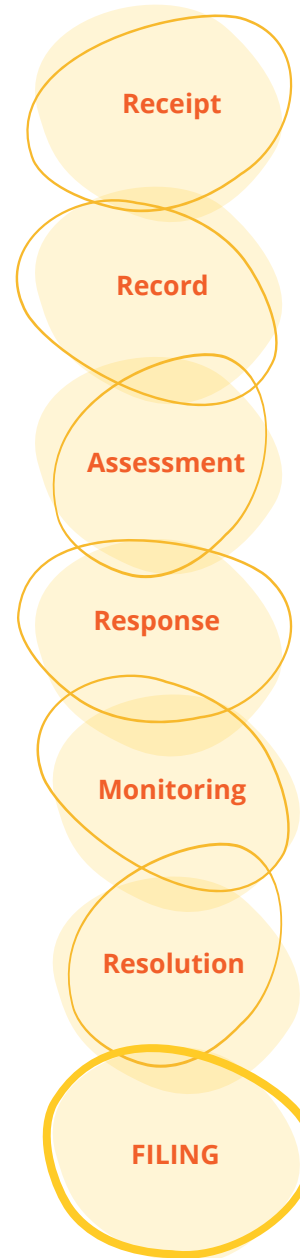
COMMUNICATION WITH STAKEHOLDERS

SOLARPACK has an **external communication procedure** whereby all stakeholders, including employees, contractors and authorities, are able to submit suggestions and proposals for improvements or report problems or complaints at any stage of the project, including the environmental assessment process.

Complaints and suggestions are filed in the communications register and subsequently reported to the project manager. The suggestion or report is then classified. In the case of a problem or a complaint, measures are identified and a coordinator is designated to resolve the issue. In the case of a suggestion or proposal, a coordinator is designated to

review it; to the extent that the employee proposes to introduce a new process or system and his/her idea is given due consideration, a coordinator is designated to oversee the process. Subsequently, the party concerned is informed of the measures to be introduced as well as the scheduled timeline for the introduction and monitoring of the measures.

The supervisor in charge of community relations then checks that the identified measures have been correctly introduced, and the case is closed. Finally, the process, along with the measures taken, is duly documented and closed.



In 2021, SOLARPACK received 2 complaints which were resolved without any further action being taken, in accordance with the established procedure

In Q3 2020, to identify the ESG aspects deemed to be most relevant by SOLARPACK, and in keeping with best practices, the Company conducted a materiality study based on the advice of an independent external consultant. It was duly updated in 2021.

The materiality analysis primarily involved a comprehensive assessment of external sources of information, including the direct global competitors of SOLARPACK, the various non-financial disclosure standards, stakeholders within the investor community and sectoral promoters with business influence, and a detailed analysis of the risks to which the Company is exposed both in countries of operation and the sector in which it is active.

In a bid to faithfully reflect the relevance of the various identified aspects, the company enhanced the study by producing an internal analysis based on surveys, in which the criteria of the most important governing bodies of the Company were assessed along with other relevant stakeholders for SOLARPACK.

INTERNAL SOURCES

- Board of Directors
- Management
- Business units
- Suppliers
- Consultants
- Financing parties

EXTERNAL SOURCES

- Sustainability Standards
- Competitors
- Investors
- Opinion leaders
- Press analysis
- Country risk factors
- Sector risk factors



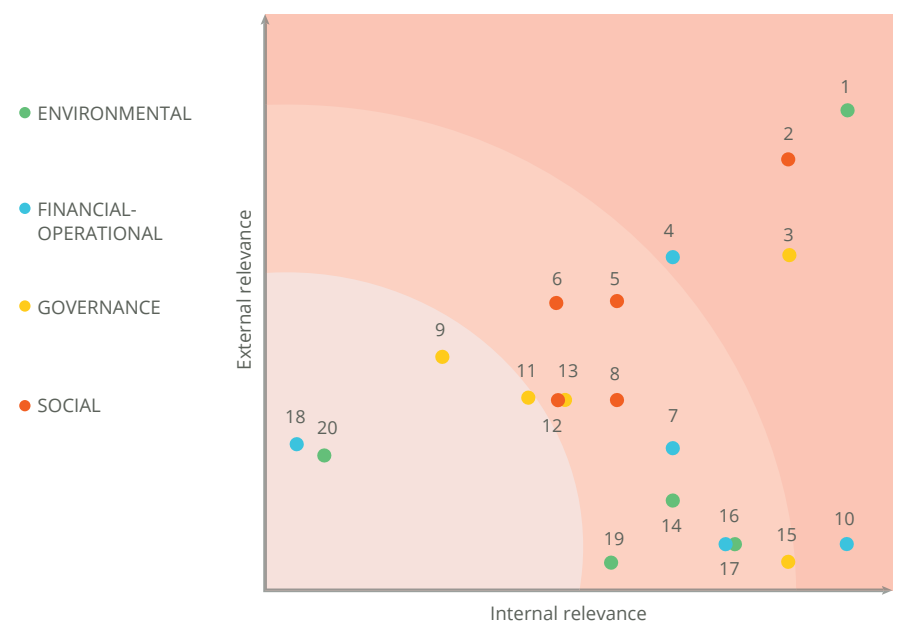
5.3 Materiality analysis

IDENTIFIED MATERIAL ASPECTS

This analysis identified 20 material aspects for SOLARPACK. These matters are classified into four groups or dimensions:

- Environmental ● Financial-operational
- Governance ● Social

As a result of cross-referencing and weighting the different scores obtained in the external and internal analysis, the 20 material aspects are distributed into the following matrix, which orders the external priority along the vertical axis and the internal priority along the horizontal axis:



| MATERIAL TOPICS | RELATED CHAPTER |
|--|---|
| 1 Energy transition and climate change | 7.1 Climate action |
| 2 Health and Safety of employees and suppliers | 8.1 Health and safety 9.3 Suppliers |
| 3 Ethics and corruption | 6. Setting an example through governance 6.2 Regulatory instruments |
| 4 Supply chain control | 9. Managing a sustainable value chain |
| 5 Promoting local diversity, social support and dialogue in disadvantaged communities | 5.2. Our relationship with stakeholders 9. Managing a sustainable value chain 9.1 Social action |
| 6 Diversity and equality | 8.4 Equality and diversity |
| 7 Economic and financial performance | 3. 2021 in figures |
| 8 Attracting and retaining talent | 8.2. Human resources to the fore |
| 9 Digitalization and cybersecurity | 6.3 Risk management and compliance |
| 10 R&D investment | 6. Setting an example through governance |
| 11 Integration of ESG criteria in strategies and decision-making processes | 5. Sustainability as a cross-cutting issue 5.2 Our relationship with stakeholders |
| 12 Human Rights | 6. Setting an example through governance 9.2 Respect for Human Rights |
| 13 Good corporate governance | 6. Setting an example through governance |
| 14 Comprehensive Environmental Management System | 6.2 Regulatory instruments 7. The type of planet we want to inhabit |
| 15 Risk (financial and non-financial) management | 6.3 Risk management and compliance |
| 16 Protection of biodiversity | 6.2 Regulatory instruments 7.3 Protection of biodiversity |
| 17 Customer satisfaction | 9.4 Customers |
| 18 Green financing | 5 Our 2021-2023 Strategic ESG Plan |
| 19 Circular economy and waste management | 7.2 Circular economy and waste management |
| 20 Sustainable resource use | 7.1 Climate action |

SOLARPACK endorses the Principles of the UN Global Company and is committed to the 2030 Agenda.

In 2015, the UN approved the 2030 Agenda on Sustainable Development, consisting of a total of 17 goals. The aim of these goals is to transform our world for the better and to bring all stakeholders together with a view to achieving inclusive and sustainable economic growth, sustained social development and environmental protection, in the interest of making the world a better place for future generations.

In light of the business model on which it is based, the commitment is intrinsically linked to SDG 4,5, 7, 8, 9, 10, 13 and 17.

5.4. 2030 Agenda

SUSTAINABLE DEVELOPMENT GOALS



The primary indicators used to determine SOLARPACK'S performance in relation to the aforementioned SDGs are presented below.

| SDGs | CONTENT | METRICS |
|------|---------|---------|
|------|---------|---------|



QUALITY EDUCATION

While enrolment in primary education has climbed to 91% in developing countries, still 57 million children do not go to primary school. More than half of the children who have not been enrolled in primary education live in Sub-Saharan Africa. It is estimated that 50% of the children that do not go to primary school live in conflict zones. 617 million young people in the world lack basic numeracy and literacy skills.

12 education centres are supported
1,861 pupils have benefited





ACHIEVE GENDER EQUALITY AND EMPOWER ALL WOMEN AND GIRLS

Worldwide, women only make 77 cents for every dollar earned by men for the same work. One in every three women has experienced either physical and/or sexual violence and approximately 750 million women and girls were married before the age of 18. Moreover, only 13% of land owners were women and only 24% of national parliamentarians were women as of November 2018.

25.6% of SOLARPACK'S workforce is female
31% of the Management Committee is female

| SDGs | CONTENT | METRICS |
|---|--|---|
|  <p>7 AFFORDABLE AND CLEAN ENERGY</p> <p>ENSURE ACCESS TO AFFORDABLE, RELIABLE, SUSTAINABLE AND MODERN ENERGY FOR ALL</p> | <p>13% of the global population still does not have access to modern electricity services and it is estimated that some 3 billion people have had to depend on wood, vegetable carbon or animal waste to cook and heat food. 60% of global greenhouse gas emissions are caused by power generation. In 2015, 17.5% of final energy consumption stemmed from renewable energy sources.</p> | <p>SOLARPACK has constructed facilities with total power of 1,151 MW</p> <p>In 2021, SOLARPACK produced 929GWh of 100% clean energy</p> |
|  <p>8 DECENT WORK AND ECONOMIC GROWTH</p> <p>PROMOTE SUSTAINED, INCLUSIVE AND SUSTAINABLE ECONOMIC GROWTH, FULL AND PRODUCTIVE AND DECENT WORK FOR ALL</p> | <p>In 2017, the global unemployment rate stood at approximately 5.4% and in 2019 61% of employees did not have a formal employment contract. Moreover, of the 40 countries for which data is available, men are paid more than women (approximately 12.5% per month) and the gender pay gap is estimated at 23% globally. In any event, and despite their greater prominence in public life, women are 2.6 times more likely than men to stay at home and take care of the family.</p> | <p>85% of the workforce is employed on an open-ended contract</p> <p>93% of jobs go to locals</p> <p>100% of employees are covered by a collective bargaining agreement (Spain)</p> <p>€ 98,510,000 in value generated</p> <p>€ 71,369,000 in value distributed</p> |
|  <p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> <p>BUILD RESILIENT INFRASTRUCTURE, PROMOTE INCLUSIVE AND SUSTAINABLE INDUSTRIALISATION AND FOSTER INNOVATION</p> | <p>In many developing countries, basic infrastructure (roads, IT and communication, sewage, electricity and water) is scarce. This scarcity can affect the productivity of businesses in African countries by up to 40%. Moreover, in developing countries, less than 30% of agricultural production is processed, as opposed to 98% in high-income countries.</p> | <p>Projects totalling 186 MW in operation</p> <p>PV plants with 670 MW in operation</p> <p>PV plants with 343 MW under construction</p> <p>Projects totalling 8,050 MW in development</p> |



| SDGs | CONTENT | METRICS |
|--|--|---|
|  <p>REDUCE INEQUALITY WITHIN AND AMONG COUNTRIES</p> | <p>Social protection has become an issue of great concern in recent years, and some groups, such as people with disabilities, are up to 5 times more likely to face catastrophic health care expenses.</p> <p>In respect of maternal mortality, women who live in rural areas (in developing countries) are up to 3 times more likely to die during childbirth than those who live in urban areas.</p> <p>By and large, women are more likely than men to live with less than 50% of average earnings.</p> | <p>Our workforce includes 2 employees with disabilities</p> <p>246 local employees recruited</p> <p>24 supplier inspections according to social criteria</p> |
|  <p>TAKE URGENT ACTION TO COMBAT CLIMATE CHANGE AND ITS IMPACTS</p> | <p>Global carbon dioxide emissions have increased 50% since the baseline year of 1990. In the decade between 2000 and 2010, emissions increased by more than 3 times the amount of the previous 3 decades put together. In a bid to hold the global average temperature increase to 2°C above pre-industrial levels, we must adopt a series of measures and change our behaviour.</p> | <p>Financial resources totalling € 371,121 allocated to environmental aspects</p> <p>658,481 tCO₂ of emissions avoided</p> |
|  <p>REVITALISE THE GLOBAL ALLIANCE FOR SUSTAINABLE DEVELOPMENT</p> | <p>Inclusive associations which are formed to promote principles and values, and which are set out to ensure that decisions are made in the interests of people and the planet, guarantee due compliance with the development programme.</p> <p>Approximately 4 billion people are still without access to internet and almost 90% of them live in developing countries.</p> | <p>13 Social Action projects during the 2021 financial year</p> <p>11 Countries impacted</p> <p>€ 364,578 donated</p> <p>9 alliances or partner organisations</p> <p>16,297 beneficiaries</p> |



6.

Setting an example through governance

- Good governance and transparency**
- Regulatory instruments**
- Risk management and Compliance**



6.1. Good governance and transparency

The governance structure of SOLARPACK is currently in transition after the company was acquired by the fund *EQT Infrastructure* in 2021 and subsequently delisted from the Spanish Stock Market. It has since embarked on a reorganisation of its governing bodies.

The commitment to good corporate governance and transparency is one of the **cornerstones of the strategy adopted by the Company to fulfil its purpose and meet its targets.**

SOLARPACK guarantees the transparency of the actions of its governing bodies by adhering to a number of regulatory instruments established by the Company, and promoting effective risk and ESG management procedures.

GOVERNING BODIES - STRUCTURE EFFECTIVE THROUGHOUT 2021

Board of Directors

EXECUTIVE CHAIRMAN

- Ignacio Artázcoz

DEPUTY CHAIRPERSON

- Jose María Galíndez

CEO

- Pablo Burgos

PROPRIETARY DIRECTORS

- Inés Arellano
- Rafael Canales

INDEPENDENT DIRECTORS

- Begoña Beltrán de Heredia
- Gina Domanig
- Luis Barallat

NON-BOARD MEMBER SECRETARY

- Joseba Olamendi

Auditing and Compliance Committee

The Auditing and Compliance Committee is an internal reporting and advisory body which has the authority to report, advise and make proposals within its field of activity. The Committee predominantly monitors the effectiveness of the company's internal control and risk management system. The Auditing and Compliance Committee comprises three members, two female directors, one male director and a non-board member secretary; it is chaired by an independent female director:

CHAIRWOMAN

- Begoña Beltrán de Heredia

MEMBERS

- Gina Domanig
- Rafael Canales

Appointments and Remuneration Committee

The Appointments and Remuneration Committee is an internal reporting and advisory body which has the authority to report, advise and make proposals within its field of activity. It consists of three members and its basic functions include the formulation of proposals on new members of the Board of Directors and on the remuneration of the members of the Board and of the Executive Chairperson and CEO in their executive functions and of Senior Management.

CHAIRWOMAN

- Gina Domanig

MEMBERS

- Begoña Beltrán de Heredia
- Inés Arellano

Strategy and Investments Committee

The Strategy and Investments Committee is an internal reporting and advisory body which has the authority to report, advise and make proposals within its field of activity. It consists of five members and its basic functions include the formulation of proposals on growth, development or business diversification strategies, the issuance of recommendations for improvements to strategic plans and a seat on the board when resolutions are adopted about investments, divestments and any transactions and contracts of considerable amounts for the Company.

CHAIRMAN

- Jose María Galíndez

MEMBERS

- Gina Domanig
- Ignacio Artázcoz
- Pablo Burgos
- Luis Barallat



GOVERNING BODIES - CHANGES IN 2022

After the company was acquired in late 2021 and subsequently delisted from the continuous market, SOLARPACK set about restructuring its governing bodies.

Board of Directors

Updated composition of the Board

NON-EXECUTIVE CHAIRMAN

- Xabier Etxeberria

CEO

- Pablo Burgos

MEMBERS

- Javier Vega De Seoane
- Jose Galíndez
- Asis Echániz
- Maria García Arguelles

NON-MEMBER SECRETARY

- Joseba Olamendi

Auditing and Compliance Committee

This committee assists the Board with particular internal tasks in an informative and advisory capacity. While it has no executive function, it has the authority to report, advise and make proposals within its respective fields of activity.

Managerial team

Updated composition of the team

HEAD OF FINANCE

- Jaime Aldámiz-Echevarría

CHIEF FINANCIAL OFFICER

- Luis Alvargonzález

HEAD OF CORPORATE DEVELOPMENT

- Javier Arellano

HEAD OF ADMINISTRATION AND CONTROLLING

- Luján De La Rica

HEAD OF CONSTRUCTION AND EPC SALES

- Miguel De La Rosa

HEAD OF SUSTAINABILITY AND PEOPLE

- Arantza Díaz De Olarte

HEAD OF SOLARPACK LABS

- Ana Ferrero

HEAD OF TECHNICAL AREA

- Fátima Fernández

HEAD OF POWER SALES

- Iván Nieto

HEAD OF LEGAL

- Joseba Olamendi

HEAD OF BUSINESS DEVELOPMENT WEST

- Jaime Solaun

HEAD OF POWER GENERATION & SERVICES

- Tomás Parladé



INTERNAL MANAGEMENT COMMITTEES

Management Committee

This committee meets once a month and is attended by the whole managerial team of SOLARPACK. It is tasked with ensuring that the directives of the Board of Directors are applied by the CEO throughout the company.

IMS Committee

The Integrated Management System Committee meets every quarter and reports to the Quality, Health & Safety, Environment and Community Relations Unit. It is tasked with guaranteeing compliance with the quality, environmental and health & safety policy, and monitoring/supervising the established management programme.

Project Committees

The Project Coordination Committees convene fortnightly, monthly or twice a month depending on the project and the extent to which it has progressed. They analyse the progress of projects and identify potential risks and solutions to ensure that projects are executed in accordance with established plans and objectives.

ESG Committee

This Committee meets every quarter and is chaired and coordinated by Sustainability and People Unit. It outlines and supports the company's environmental, social and governance work and commitment.

Open Innovation Committee

This Committee meets every month and is chaired and coordinated by SPK Labs. It gives greater impetus to Solarpack's Open Innovation processes and defines their objectives.

Health and Safety Committee

This Committee meets every quarter and is chaired and coordinated by the Director of Health & Safety, Environment and Community Relations. It provides the resources and defines the procedures required to guarantee health and safety in the workplace.





6.2. Regulatory instruments

In response to increasingly stringent regulations, SOLARPACK has put in place various procedures by which it defines and establishes the principles, criteria and acceptable and unacceptable forms of conduct in the Company's various departments.

All internal regulations approved by SOLARPACK have been distributed to and are understood by all stakeholders of the organisation. They are available via the reporting and communication channels that SOLARPACK makes available to all its stakeholders.

CORPORATE SOCIAL RESPONSIBILITY POLICIES

General Sustainability Policy

Sets out the principles underpinning the company's sustainable development strategy.

Environmental Policy

Includes the environmental sustainability commitment and its efforts to tackle climate change.

Social Action Policy

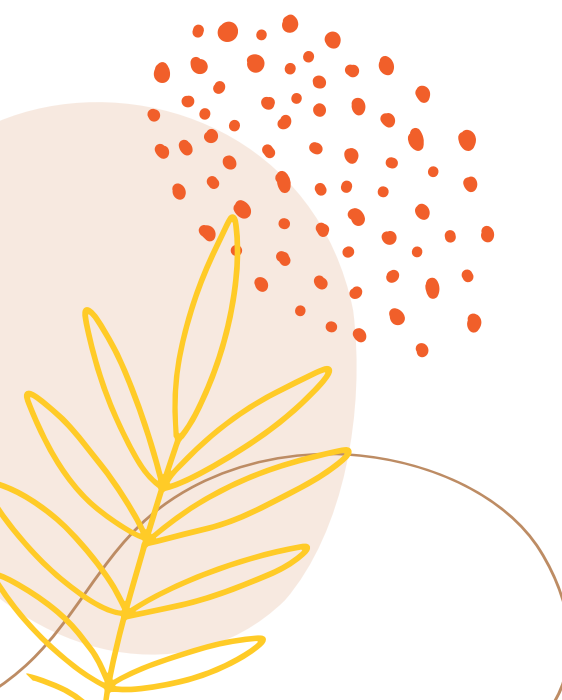
Commitment to make a positive social impact, especially in the communities in which SOLARPACK operates; and to promote and implement a programme of social measures underpinned by SOLARPACK'S purpose.

Health and Safety Policy

Outlines the measures introduced by SOLARPACK to protect the Health & Safety not only of employees but also of third parties during the activities it carries out around the world.

Human Rights Policy

Company's commitment to the UN Universal Declaration of Human Rights, the ILO Declaration, the Principles of the Global Compact, the OECD Guidance on Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights.



CODES OF CONDUCT

Code of Ethics

Sets out the purpose and all values, ethical principles and general rules of conduct applicable to all employees, executives and members of management bodies.

Code of Ethics for Suppliers

Establishes the guidelines to which suppliers, contractors and external partners are expected to adhere in accordance with SOLARPACK'S corporate culture and the laws of every country in which it operates.

OTHER POLICIES

Control and Risk Management Policy

Commitment to duly identify, monitor, manage, prioritise and control all kinds of risks.

Corporate Tax Policy

Promotes responsible tax practices in all territories in which SOLARPACK is active, in view of the interests and sustainable economic development of local communities, and subject to best tax practices.

Quality policy

Commitment to comply with our customers' specifications, and to continuously improve the quality management system.

Anti-Corruption and Anti-Fraud Policy

Defines the commitments and principles governing anti-corruption and anti-fraud in accordance with the values, general ethical principles and general rules of conduct upheld by SOLARPACK in its Code of Ethics.





6.3. Risk management and compliance

OVERALL RISK SYSTEM

SOLARPACK has introduced a continuous risk management process which aims to identify any existing risks, with the dual objective of providing a corrective solution and giving reasonable assurances that the organisation's targets will be met.

IDENTIFYING AND ASSESSING RISKS

Determine the main strategic, operational, financial and regulatory compliance risks affecting the strategy and targets of the company, by assessing their likelihood and potential impact

DEFINING MONITORING PROCEDURES

Define existing monitoring procedures within the company to mitigate previous risks

ASSESSING EFFECTIVENESS

Assess the effectiveness of procedures for monitoring the mitigation of identified risks

DEVISING ACTION PLANS

Establish action plans to reduce the residual risk to an acceptable level in view of a cost-benefit analysis of the action plans

The Risk Management Control System is structured into three lines of defence: the first concerns Management control, the second relates to the various compliance monitoring and control functions and the third is the independent assurance of internal control compliance overseen by the internal auditing unit.

In view of the increasing complexity of risk management, SOLARPACK has implemented several mechanisms to monitor risks according to their classification as short, medium or long term risks, with a view to identifying, assessing and managing the most pressing concerns in any given situation.

FIRST LINE OF DEFENCE

Departments are responsible for maintaining an effective internal control system and performing the necessary checks to identify, assess and mitigate risks

SECOND LINE OF DEFENCE

The compliance oversight and control departments make sure that processes and controls are correctly designed within the first line of defence, and that they are operating effectively

THIRD LINE OF DEFENCE

The Internal Auditing department gives an independent assurance based on subjective oversight of the two previous lines of defence, assesses the internal control system, identifies weaknesses and proposes improvements

- Control and Risk Management Policy
- Internal Control over Financial Reporting System (ICFRS)
- Crime Prevention and Detection System Manual
- Code of Ethics and Code of Ethics for Suppliers
- Integrated Management System
- Corporate Risk Map

Every year, SOLARPACK reviews and updates the model and methodology of its risk management system in order to ensure that the Risk Map information is up-to-date and can be used by the Management and Board of Directors in their management operations. As a result, effective and timely action can be taken in response to these risks.

PRINCIPAL RISKS IDENTIFIED BY THE COMPANY

Strategic risks

- Board not functioning effectively
- Lack of ethics and culture
- Absence of internal control
- Adjust the risk tolerance level in relation to objectives
- Inadequate strategic planning
- Risk of Competitors
- Business partners and partnerships
- Influence of macroeconomic factors
- Risk of supplier concentration
- Customer and staff dependence risk
- Difficulty in selecting and training staff

Financial risks

- Interest rate risk
- Exchange rate risk
- Liquidity risk
- Hedging transactions risk
- Inadequate accounting management, reporting and presentation of financial information
- Inadequate management of available economic resources
- Inadequate planning and review of activity profitability
- Risk of mistakes or inconsistencies in financial information
- Inadequate tax management
- Incorrect transfer prices
- Geopolitical risk (regulatory, political, credit)
- Credit risk of the counterparty

Compliance risks

- Compliance risks
- Violation of Code of Ethics
- Inadequate crime prevention model
- Inadequate award process management
- Suspected breach of rules and regulations
- Risk of inadequate external communications
- Ignorance of tax/legal/regulatory implications
- Inadequate production of contracts
- Breaches of contract
- Breaches by contractors of requirements of health & safety, quality and environmental systems
- Third-party liability
- Breaches by company staff of internal procedures



Operational Risks

- Difficulty in obtaining information (financial and non-financial) from systems
- Possible vulnerability to cyber-attacks and/or possible loss of relevant information.
- Unauthorised access to information systems
- Absence or inadequacy of business case for new projects
- Inadequate management of projects awarded
- Breach of quality requirements in products delivered by the Company
- Inadequate selection, recruitment and assessment of contractors
- Failure and/or inability to exploit assets
- Supply chain disruption
- Inadequate geotechnical risk assessment in the selection of land
- Rise in inflation
- Loss of Profit due to Loss Event
- Asset Losses due to Material Loss Events

Moreover, to guarantee a comprehensive approach to the management of various risks, SOLARPACK has formulated a series of medium and long-term plans which include:

- Adjust the risk tolerance level in relation to objectives.
- Assess the capacity and restrictions of systems related to non-financial matters.
- Produce a Combined Assurance Model which determines the criticality of every risk in real time, in view of various contributions (auditing recommendations, indicator result, ICFRS, Crime Prevention Model, ICNFRS, etc.).
- Introduce matters of sustainability or the concept of a Non-Financial Information Control System into the ICFRS.

ESG risks

- Environmental impact
- Biodiversity
- Local communities
- Risks of HSE accidents
- Risk of damage to reputation
- Climate Change
- Breach of the environmental and archaeological requirements to which the project developer is subject



COMPLIANCE AND CODE OF ETHICS

SOLARPACK underscores its commitment to continuous improvement and the development of a genuine corporate culture of compliance by carrying out several procedures, all of which are outlined in the Crime Prevention and Detection System, which includes the Crime Prevention and Detection System Manual, the Compliance Body Regulations, the Criminal Risk Analysis Report, the Reporting Procedure and the Disciplinary System.

In 2021, the Code of Ethics was produced and implemented in support of the Crime Prevention and Detection System. It outlines all the ethical values that are supposed to inspire and govern the conduct of SOLARPACK'S employees,

executives and management officials at all times. The values of the Code of Ethics are intrinsically linked to the following commitments:

- **Regulatory compliance**
- **Respect for Human Rights**
- **Tackling corruption and money laundering**
- **Contribution to the social and economic development of communities**
- **Preservation of and respect for the environment**
- **Transparency**
- **Relations with main stakeholders: Shareholders, Customers, Suppliers and Regulators**

Before the Code of Ethics was introduced, SOLARPACK had included the aforementioned ethical values in the Employee Handbook and regulated aspects related to the day-to-day organisation of employees in SOLARPACK (e.g. working hours, holidays, etc.). For the sake of clarity, the Code of Ethics has been introduced to supplement existing regulatory instruments. The Employee Handbook has been maintained exclusively to address aspects of the employment relationship between SOLARPACK and employees.



As SOLARPACK considers the following topics to be particularly important, they are addressed at some length in its internal regulations:

Tackling corruption and bribery

Both acts are prohibited under the Code of Ethics and under the Code of Ethics for Suppliers, which means they are completely unacceptable at every stage of the value chain. Details of these prohibited acts are outlined in the Anti-Corruption and Anti-Fraud Policy.

Money laundering

SOLARPACK undertakes not to engage in any practice or to carry out any operation in which there is a suspected or confirmed link to money laundering, terrorist financing or any other criminal activity, as outlined in its Code of Ethics and in the Code of Ethics for Suppliers.

Human Rights Violation

As established in its internal mechanisms, not least its Human Rights Policy, the company undertakes not to countenance any human rights violation at any stage of its value chain. Its commitment to human rights is also outlined in its Code of Ethics and in the Code of Ethics for Suppliers.

SOLARPACK'S employees, executives, management officials and suppliers have access to a **Reporting Channel** denuncias@solarpack.es, as a way of reporting complaints or suspicions anonymously and confidentially in relation to:

- Any breach of the Code of Ethics, protocols, instructions and other internal regulations of SOLARPACK;
- Any unethical behaviour;
- Any behaviour that contravenes current legislation;
- Any irregularity or noncompliance related to financial or accounting practices;
- Any event that may call into question the reputation of SOLARPACK.

The Reporting Channel inbox will be accessible not only to the Compliance Officer, but also to the Chair of the Auditing and Compliance Committee.

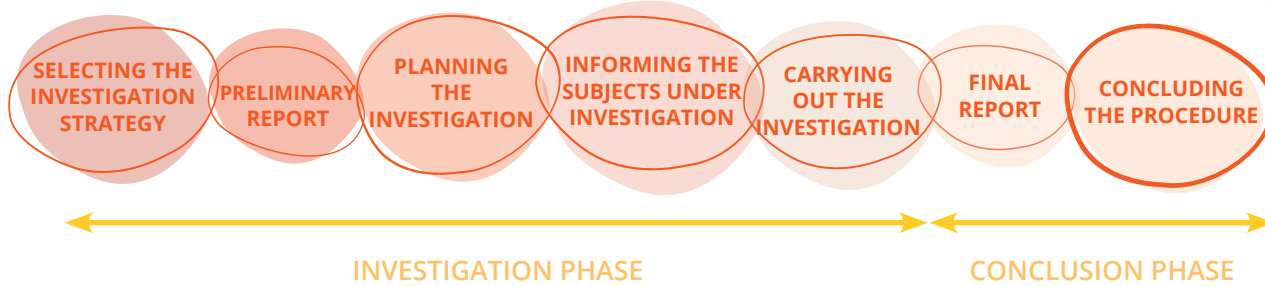
If, in view of the situation, the Compliance Office is in any way involved, compromised or concerned by a conflict of interest, the **Alternative Direct Channel** e-mail operated by the Auditing and Compliance Committee of the Board of Directors may be used (exclusively for this purpose): comisiónauditoria@solarpack.es.



IN THE EVENT THAT A REPORT IS RECEIVED

For reports received via any methods other than those specified in this procedure (verbal, telephone, etc.), attempts will be made to redirect them in accordance with the requirements of this procedure. Failure to comply with legal provisions or the provisions of the Code of Ethics and other implementing regulations will lead to disciplinary measures being taken in accordance with labour law and the applicable collective bargaining agreement. The Disciplinary System will be used to classify the conduct according to severity.

The Compliance Officer will confidentially inform the reporting party that the report is being processed, within five business days of receipt of the report, provided that it has not been submitted anonymously. If appropriate, the investigation will begin and a procedure will then be undertaken to close the report.



Notwithstanding the role of the Compliance Officer in the Reporting Procedure, the Compliance Body Regulations will regulate the procedural options available to the various groups and bodies of SOLARPACK who are tasked with monitoring the continuous control mechanisms for the detection of any criminal risks and other risks related to SOLARPACK'S activities; and with assuring the effective implementation of the Crime Prevention and Detection System.

The tools and resources which are used to guarantee **compliance with crime prevention and detection regulations** are structured as follows:

Board of Directors

Supreme decision-making authority with ultimate responsibility for the existence and effective implementation of the Crime Prevention and Detection System, and for the promotion of an ethical culture across all departments of the Company.

Compliance officer

Responsible for implementing the measures, initiatives, policies and controls to ensure and check that the organisation operates with integrity and strictly complies with the laws, regulations and internal and external policies to which it is subject.

Auditing and Compliance Committee

Responsible for oversight and effectiveness of the Crime Prevention and Detection System.

Internal Audit

Responsible for regular oversight of the Crime Prevention and Detection System.

Senior Management

Members of SOLARPACK'S Management Committee responsible for introducing, guaranteeing and distributing the measures established by the Compliance Officer; also responsible for promoting the highest ethical standards through the example they set.

Employees

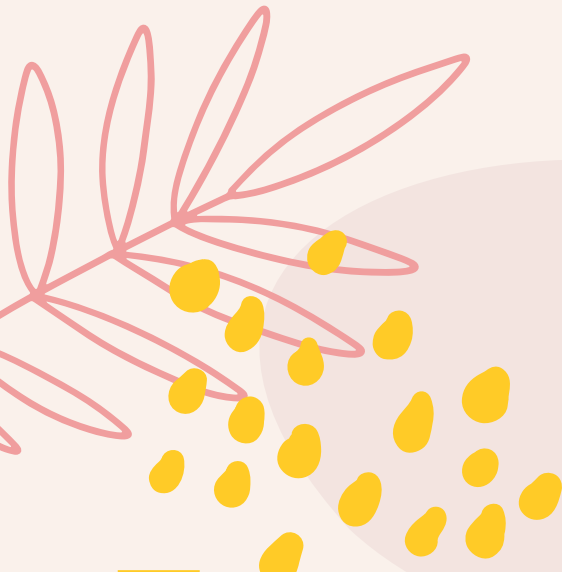
Responsible for acting in accordance with the necessary due diligence measures introduced by the Compliance Officer to guarantee compliance with laws and internal and external regulations.

GOVERNANCE INITIATIVES UNDERTAKEN IN 2021

- **Renewal of Board of Directors**
- **Creation of new internal committees: Integrated Management System Committee, ESG Committee, Open Innovation Committee and Health & Safety Committee**
- **Update of risk map**
 - Identification of new emerging risks in light of the analysis conducted by the Management Committee and General Management
 - Review of all identified risks
 - Risk indicator monitoring plan
 - Business opportunity identification
- **Introduction of the Integrated Management System and achievement of ISO 14001, 9001 and 45001 certification.**
- **Reviews of ICFRS and Crime Prevention and Detection System based on internal audit.**
- **Training initiatives for relevant staff, to achieve COSO ERM (*Enterprise Risk Management*) certification**
- **Production and implementation of new Codes:**
 - Code of Ethics
 - Code of Ethics for Suppliers
- **Launch of the Reporting Channel for suppliers**
- **Development and implementation of the following policies:**
 - Anti-Corruption and Anti-Fraud Policy
 - Human Rights Policy
 - Social Action Policy
 - Quality Policy
- **Update of the following policies**
 - General Sustainability Policy
 - Health & Safety Policy
 - Environmental Policy

MAJOR CHALLENGES IN 2022

- Update of the Board's matrix of skills according to the new composition
- Maintain the link between variable pay and ESG KPIs
- Continuous improvement of risk management and compliance system
- Internal regulations kept up-to-date in accordance with best corporate governance practices
- Compliance training for the entire workforce: Code of Ethics and Anti-Corruption and Anti-Fraud Policy
- Forging alliances with entities and associations that promote ESG causes



7.

The type of planet we want to inhabit

Climate Action

Circular economy and waste management

Protection of biodiversity





7.1. Climate Action

SOLARPACK'S business activities have an inherently positive impact on the environment, given the extent to which renewable energies help to reduce global greenhouse gas emissions.

However, SOLARPACK'S commitment to sustainability and environmental responsibility go much further, as shown by the measures it implements to control and minimise the environmental impact of all its activities.

It should be noted that, for the purpose of obtaining the relevant permits for all its projects, the company carries out preliminary environmental assessment procedures to analyse the environmental feasibility and impact of every project. One step in this process involves producing individual environmental impact prevention or minimisation plans and deploying an official to oversee the relevant protocols.

More effective use of natural resources by SOLARPACK:

USE OF RAW MATERIALS AND INITIATIVES INTRODUCED TO MINIMISE THE USE OF MATERIALS

SOLARPACK uses raw materials as part of its field operations and for the administrative tasks it performs in the office environment.

- **In plants:** Sand and gravel are used predominantly in the construction phase of every project. It is either produced when the earth of the project site is shifted, or extracted from approved quarries.
- **In offices:** The materials used in this environment largely consist of office products such as toner, paper and recyclable batteries.

RAW MATERIALS USED IN PLANTS⁴

| T | 2020 | 2021 |
|-----------------|------|------|
| Sand and gravel | 41.5 | 57.3 |

To minimise SOLARPACK'S consumption of raw materials in plants, the company has introduced an environmental indicator monitoring system in a bid to control and promote the effective use of resources as well as to establish an appropriate waste removal system.



⁴ The data about the consumption of raw materials by offices are not reported as they are not deemed to be relevant

WATER CONSUMPTION AND INITIATIVES INTRODUCED TO MINIMISE THE USE OF WATER

While SOLARPACK only uses this resource on a limited basis, it remains central to the performance of the company's activities:

- **In plants**, it is used predominantly to water roads during construction and to clean modules during the operation of the plants.
- **In offices**, water consumption can be, bottled water for human consumption; or mains water.

WATER CONSUMED IN PLANTS⁵

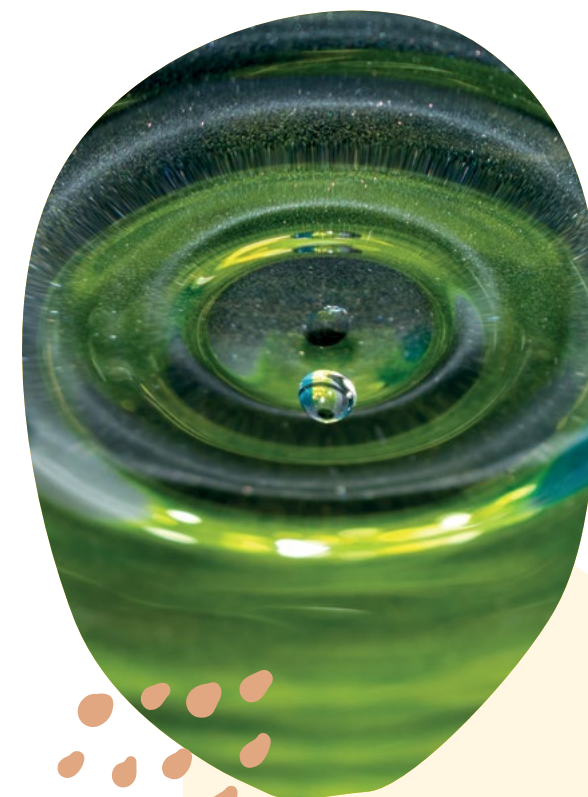
| L | 2020 | 2021 |
|--------------------------|------------------|-------------------|
| Water for industrial use | 5,247,994 | 10,956,093 |
| Drinking water | 109,530 | 147,036 |
| TOTAL | 5,357,524 | 11,103,129 |

WATER CONSUMED IN OFFICES⁶

| L | 2020 | 2021 |
|---------------|---------------|----------------|
| Supply | 67,680 | 108,880 |
| Bottled water | 5,212 | 8,406 |
| TOTAL | 72,892 | 117,286 |

The following measures have been introduced by the company to **minimise water consumption**:

- **In plants**, during operation and maintenance, dry cleaning tests take place in various locations with a view to reducing water consumption, especially as part of projects located in desert areas where access to water is limited.
- **In offices**, employees are encouraged to use water more effectively by informative e-mails and best practice notices.



⁵ Drinking water data from 2021 do not include the 2,212,000 litres used in the construction of 3SP (Malaysia) in light of an extraordinary and exceptional circumstance which is not, therefore, comparable to the standardised consumption of all other projects.

⁶ The reported office information relates to data collected from the two main offices of the Company (Seville and Getxo). SOLARPACK is currently developing a reporting system whereby the data from other locations can also be provided in future reporting periods. It should be noted that the supply data are estimates and the values of 2020 have been recalculated for comparison. In 2020, only 9 months of office consumption have been calculated due to the COVID-19 lockdown.

GREENHOUSE GAS EMISSIONS

SOLARPACK'S primary source of greenhouse gas emissions is the energy consumed during the performance of its operations in:

- **In plants**, during construction, operation and maintenance, the primary source of energy consumption is the use of fuel for auxiliary systems, such as electric generating sets and transport. Occasionally, energy from the grid and, in some cases, the energy generated by the plant may be used.
- **In offices**, the consumption of energy stems from the electricity used for the lighting, heating and air conditioning of the facilities.
- **The transport** of employees due to use of fuel.

As for other kinds of significant atmospheric pollution, **no emissions of other substances that affect the ozone layer have been identified.** Despite that, to minimise any potential atmospheric pollution, SOLARPACK introduces measures designed to minimise the generation of dust by frequently watering areas and cleaning vehicles on site.

No material noise or light pollution has been detected. Despite that, to minimise any potential impact during construction, construction procedures factor in these considerations.

The **greenhouse gas emissions** categorised by scope are shown below.

GREENHOUSE GAS EMISSIONS*

| <i>tCO₂ equivalent</i> | 2020 | 2021 |
|-----------------------------------|------------|--------------|
| Scope 1 | 652 | 684 |
| Scope 2 | 85 | 81 |
| Scope 3 | 185 | 271 |
| TOTAL | 922 | 1,036 |

*2020 data recalculated according to homogeneous criteria from 2021

In 2021, SOLARPACK employees traveled a total of **1,901,691 km** in different means of transportation. In light of the situation caused by the pandemic, the number of kilometres has risen considerably, especially for journeys travelled in vehicles hired or owned by the Company's employees.

KILOMETRES COVERED BY MEAN OF TRANSPORT

| <i>Km</i> | 2020 | 2021 |
|--------------|------------------|------------------|
| Plane | 1,014,128 | 1,476,568 |
| Train | 47,910 | 48,868 |
| Vehicle | 35,979 | 376,255 |
| TOTAL | 1,098,017 | 1,901,691 |

ENERGY CONSUMED AND ENERGY EFFICIENCY INITIATIVES

While the potential for energy efficiency improvement is limited, on account of the type and size of the installations, SOLARPACK encourages all its stakeholders to use the company's equipment and facilities more efficiently, and generally undertakes its operations with a view to improving energy efficiency.

- **In plants**, efficient use of energy resources is promoted through signage.
- **In the offices** of Getxo and Seville, to minimise electricity consumption, air conditioning systems are only operated during working hours and are unavailable between 8 p.m. and 8 a.m.
- Energy audits have been conducted at work sites in Spain in order to identify possible areas for improvement, as part of the environmental management programme.

ENERGY CONSUMED IN PLANTS

| | Ut | 2020 | 2021 |
|----------------------------|----|-----------|-----------|
| Electricity kWh | | 3,777,473 | 4,269,548 |
| Diesel fuel ⁷ L | | 226,758 | 212,145 |

ENERGY CONSUMED IN OFFICES*

| | 2020 | 2021 |
|-------------------|--------|--------|
| Electricity (kWh) | 81,350 | 89,407 |

⁷ The diesel fuel data include the fuel consumed during construction projects and in operational plant

*Includes offices in Spain

93% OF ENERGY CONSUMED IN PLANTS AND 43% OF ENERGY CONSUMED IN OFFICES STEMS FROM 100% RENEWABLE SOURCES



SOLARPACK ALLOCATES € 373,121 AND HAS A TEAM OF 29 OFFICIALS TO OVERSEE ENVIRONMENTAL ASPECTS

RESOURCES DEDICATED BY SOLARPACK TO ENVIRONMENTAL PROTECTION

The company deploys 6 staff members to monitor environmental aspects during all project stages, and contracts 23 suppliers to perform related tasks. These staff members are tasked with assessing and monitoring the environmental impact of construction and operation projects.

Fewer human resources were deployed to oversee environmental aspects because the number of projects in the year fell by comparison to 2020 figures.

Besides these staff resources, SOLARPACK also makes available financial resources for the purpose of protecting the environment. In 2021, the Company allocated a total of € 371,121 to cover the costs of suppliers and staff working in this field.

Moreover, SOLARPACK does not have any provisions and guarantees for environmental risks.

STAFF RESOURCES ASSIGNED TO OVERSEE ENVIRONMENTAL ASPECTS

| <i>Number of resources</i> | 2020 | 2021 |
|----------------------------|-----------|-----------|
| Employees | 12 | 6 |
| Suppliers | 28 | 23 |
| TOTAL | 40 | 29 |

FINANCIAL RESOURCES DEDICATED TO ENVIRONMENTAL ACTIVITIES

| <i>Number of resources</i> | 2020 | 2021 |
|----------------------------|----------------|----------------|
| Staff | 173,948 | 56,495 |
| Suppliers | 293,888 | 314,626 |
| TOTAL | 467,836 | 371,121 |



7.2. Circular economy and waste management

As part of its circular economy action plan, SOLARPACK encourages all its stakeholders to optimise their use of resources, to reduce their consumption of raw materials and to recycle or repurpose their waste.

Waste is predominantly generated during the project construction phase. Approved waste disposal companies are generally contracted to manage and recycle the waste produced at work centres/sites. It should be noted that waste management varies according to the country in which the project is based.

WASTE PRODUCTION

SOLARPACK collects information on a monthly basis to monitor waste production and management, and classifies the waste as hazardous and non-hazardous waste. This waste produced in offices or plants is managed by approved companies which sort and transport the waste to special containers or to a clean point.

- **In offices**, much of SOLARPACK'S waste is produced during administrative tasks: paper, toners, batteries, obsolete IT devices, cardboard, common use of the office, plastic packaging, food leftovers...it is managed by approved companies which sort and transport the waste to special containers or a clean point. The toners of some offices are recycled by the NGO *Red Madre*.
- **In plants**, waste is predominantly

produced during construction in the form of cardboard, wood and plastic primarily from the packaging of modules and equipment. It should be noted that topsoil waste increased in 2021 due to the projects in Malaysia, where a substantial amount of vegetable material was produced.

The data recorded in 2020 and 2021 are presented below:

WASTE PRODUCED IN PLANTS

| Hazardous | Ut | 2020 | 2021 |
|---------------------------|-----------|-------------|-------------|
| Waste oils | Kg | 143 | 61 |
| Contaminated packaging | Kg | 484 | 68 |
| Contaminated material | Kg | 325 | 106 |
| Aerosols | Kg | 374 | 101 |
| Contaminated land | Kg | 8,860 | 230 |
| Other hazardous waste | Kg | 5 | 193 |
| Non-hazardous | | | |
| Waste/topsoil | Kg | 479,612 | 2,696,642* |
| Municipal solid waste | Kg | 66,027 | 61,698 |
| Liquid waste | L | 40,825 | 87,499 |
| Defective modules | U | 1,011 | 1,113 |
| Concrete remains | Kg | 900,000 | 7,000 |
| Cardboard | Kg | 221,983 | 123,673 |
| Wood | Kg | 553,820 | 323,690 |
| Plastics | Kg | 36,180 | 55,808 |
| Scrap metal | Kg | 126,688 | 16,571 |
| Mix of industrial waste | Kg | 284,700 | 251,750 |
| Other non-hazardous waste | Kg | 146 | 8 |

* Malaysia is excluded (21,156,000) from comparison due to the exceptional nature of the project

WASTE PRODUCED IN OFFICES*

| Hazardous | Ut | 2020 | 2021 |
|-----------------------------|----------------|-------------|-------------|
| Fluorescents | Ut | 2 | 0 |
| Non-hazardous | | | |
| Urban solid waste | Kg | 25,774 | 41,808 |
| Toner | Kg | 5 | 2 |
| Batteries | Kg | 11 | 11 |
| Electronic devices | Kg | 120 | 56 |
| Paper and cardboard | Kg | 3,607 | 3,858 |
| Plastic, packaging and cans | Kg | 1,222 | 1,944 |
| Rubble | m ³ | 50 | 0 |

* Scope Offices in Spain: MSW and plastics data based on estimates (LER) for 12 months in 2021 and 9 months in 2020 due to COVID-19

The measures introduced by SOLARPACK to **raise awareness of the environmental issue of waste management** include:

- Measures have been implemented in office environments to reduce the consumption for printing materials, such as mandatory two-sided printing.
- To minimise plastic consumption, it is now compulsory to use biodegradable cutlery and plates; plastic coffee stirrers have been replaced by ones made from bamboo; and glass bottles have been distributed to all employees.
- Appropriate containers for paper, cardboard and batteries are now available in offices to encourage staff to adopt the practices of approved waste management procedures.
- Clean points and temporary stockpiling areas are available on the project sites; they include different containers to promote appropriate separation and management practices.
- Communications are sent to employees to raise awareness of recycling practices. Training programmes covering waste management guidelines are provided in advance of all projects.

It should be noted that, as food waste is not currently considered to be a primary concern for SOLARPACK, no special measures have been introduced to tackle the issue.

Despite our efforts to reduce consumption, the use of disposal materials increased during the reporting period on account of the pandemic and the measures put in place to keep employees safe.

SOLARPACK ensures that every project in which it is involved complies with the requirements of applicable biodiversity protection regulations.

Its Environmental Policy is underpinned by its steadfast commitment to the protection of ecosystems, biodiversity and the cultural heritage of the natural environments in which its projects are based.

In identifying the location of its projects, SOLARPACK **avoids locating their projects in protected species habitats**. In the interest of reducing the impact on these areas, the Company conducts studies to identify possible impacts. If the study identifies the existence of a protected area, analyses are carried out to determine possible mitigation measures. These measures must be acceptable and cover at least the design, construction and operation of the project.

In 2021, a total of 6 projects were located in an area covered by some degree of protection in accordance with local, state or international regulations.

7.3. Protection of biodiversity



Whenever a new project is launched or new PV plants are constructed, SOLARPACK comprehensively analyses and assesses their potential environmental impacts and, if necessary, subsequently introduces measures to counter and reduce the impact. If the risks are unable to be completely mitigated, compensatory measures are put in place.

The **tools used to minimise the impact on biodiversity** include:

- **Territorial Planning Instruments (TPI)**
- **Geotechnical studies**
- **Hydrological studies**
- **Assessment of various environmental aspects to make sure there is no significant impact on natural resources such as soil quality, water courses, animal and plant life, archaeological heritage, landscape, local communities, etc.**

In 2021, the Company did not record any incident that could have impacted biodiversity.



BIODIVERSITY PROTECTION PROJECTS

In the context of **Panimavida Project** (Chile), artificial shelters have been created in an exclusion area to serve as settlements for amphibians.

To this end, as part of projects in close proximity to tern nesting areas, SOLARPACK has convened with "Red de Observadores de Aves y Vida Silvestre de Chile" (non-governmental environmental organisation committed to the conservation of birds and biodiversity in Chile) to develop a clearer understanding of the measures needed to defend and protect this endangered species.

In the context of **Tejeda Solar Project** (Spain), approximately 2 hectares of land have been allocated to the natural restoration of animal and plant life. The project restricts access by people and vehicles to the site.



AGROVOLTAICS

SOLARPACK has conducted a viability study in relation to the use of land for both agricultural and photovoltaic power generation purposes. The aim is to produce solar energy and agricultural products using the same amount of land, while optimising links between the two industries.

The concept is designed to increase the reliability of renewable energy and the robustness of agricultural practices by creating a hybrid system of agricultural and photovoltaic energy infrastructure. This dual-use system is advantageous in a number of other ways. For instance, it can serve to improve the management of unwanted vegetation, to remove any obstacles that cast shadows over solar modules and, last but by no means least, to enhance relations with local communities, since the system minimises potential displacement of agricultural land.

Agrovoltaics is an overwhelmingly positive solution for all parties as it:

- Mitigates displacement of arable and pastoral farming land
- Stimulates economic activity in the area by combining arable/pastoral farming and photovoltaic plants on the same site
- Optimises the sustainable use of the land for the generation of solar energy and arable/pastoral farming
- Manages unwanted vegetation
- Promotes eco-friendly arable/pastoral farming based on a zero-tolerance approach to herbicides
- Minimises the risk of fires
- Controls the deterioration and erosion of the land



AGROVOLTAIC PROJECTS: 3SP (MALAYSIA) AND LLERENA (SPAIN)

In 2021, as part of a pilot project coordinated by SOLARPACK, a **ginger plantation** was established under the photovoltaic panels of the **3SP plant in Malaysia**. In light of expert studies into the potential benefit that the shade of panels may have on these crops, an initial plantation was established on two separate sites to determine the extent to which growth and rooting are affected by different climatic conditions. The results of this experiment are currently under assessment.

Steps were taken at the **Llerena plant (Spain)** to prepare the land and improve the vegetation cover with **legume seeds and Hamel oats** which are typically used in livestock feeding. It should be noted that all agricultural practices are eco-friendly and farmers are not allowed to use any form of herbicides. The quality of the resulting pasture land is superior to the grass produced by the naturally occurring process and this practice maintains a thin layer of vegetable cover to protect against soil deterioration.



ENVIRONMENTAL INITIATIVES UNDERTAKEN IN 2021

- **Environmental audits** were carried out as part of projects in Chile and Spain by external contractors
- On the basis of ISO 14001 certification, an **Integrated Environmental Management System** has been introduced to standardise the company's environmental operations; it enables environmental identification and assessment procedures to be established for every work site
- **Energy audits** have been conducted at work sites in Spain in order to identify possible areas for improvement, as part of the environmental management programme
- Improvements in fuel consumption monitoring
- **Internal communication** campaign to promote good environmental practices
- Special internal **training** programmes
- on the sustainable use of resources
- Use of semi-automatic robotic devices to clean modules with a view **minimising water consumption**
- Participation in the '**Climate change accelerator**' initiative endorsed by **the Global Compact** to set emissions reduction targets
- Improving **waste management** procedures by contracting approved waste management operators
- **Biodiversity protection projects:** settlements for amphibians in Chile; restoration of animal and plant life in Tejeda (Spain); projects promoting the use of land involving arable/pastoral farming practices

MAJOR CHALLENGES IN 2022

- Update the Environmental Policy **to reaffirm the commitment to the management and reporting of climate change risks** and other environmental aspects
- Analyse emissions and **set an emissions reduction target in accordance with SBTi**
- **Improve biodiversity impact programmes and reporting** in order to minimise impacts
- Devise **plans to offset the impact** that projects have on biodiversity and ecosystems
- Continuous improvement of **Quality Management System**



8.

Responsible corporate culture

- Health and Safety of employees
- Human resources to the fore
- Attracting and retaining talent
- Equality and diversity

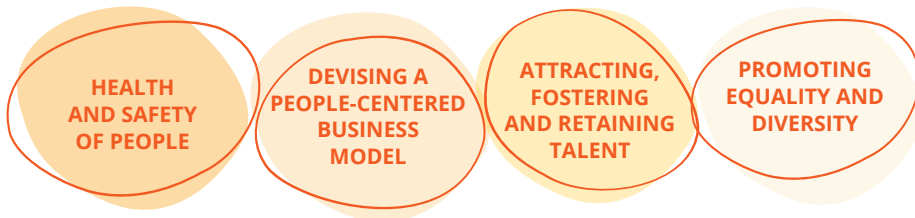
People and Organisation area is responsible for defining and enforcing the policies for attracting, managing and retaining the talent that the Company needs to achieve its objectives. It also checks that legal and financial obligations with regard to personnel management are being fulfilled in all the countries where SOLARPACK is active.

SOLARPACK considers people to be the bedrock of its business model. That is why it pulls out all the stops to create an environment of respect, tolerance and cooperation, especially given the effect that such an environment has on

employee satisfaction and the efficiency of the overall organisation.

In respect of HR management, SOLARPACK prioritises the following aspects:

SOLARPACK'S PRIORITIES





8.1. Health & Security

SOLARPACK'S Health and Safety area provides the equipment and implements the practices in the interests of creating a healthy and safe working environment for all employees. SOLARPACK has established a multi-functional department to address all the needs, commitments and obligations in respect of environment, health and safety and community relations at all operating sites and for all the company's business activities.

As occupational health and safety is a top priority for SOLARPACK, every year special health & safety indicators are incorporated into the annual corporate objectives established for the entire organisation.

The Health & Safety Management System has been introduced to consolidate the work done by a multi-functional department that manages all the Company's data, with a view to setting targets, increasing the health and safety awareness of employees, and improving procedures.

SPECIAL HEALTH & SAFETY INDICATORS ARE INCORPORATED INTO THE ANNUAL CORPORATE OBJECTIVES ESTABLISHED FOR THE ENTIRE ORGANISATION

Health & Safety and Environment, coordinated by the Technical Department, is responsible for managing SOLARPACK'S Integrated Management System (IMS), including all forms of certification, policies and procedures related to health & safety and the environment.

The Integrated Management System (IMS) sets out the procedures and tools used to control, supervise and improve the Company's Health & Safety and Environment record. The system enables the Company to demonstrate to stakeholders that their requirements have been met, to identify potential hazards, to put in place safeguards to mitigate or prevent damage, to involve employees, and to urge contractors to prioritise safety in their day-to-day operations.

The company has also contracted a prevention service in Spain to monitor occupational risk prevention throughout

the company by conducting risk assessments of work positions/areas and devising preventive plans.

SOLARPACK aims to provide an Occupational accident-free, disease-free, healthy and safe working environment by effectively preventing occupational risks.

The major risks observed throughout the Company occur in the construction activity which relies on a high number of subcontracted personnel. SOLARPACK considers health & safety across its value chain to be as important as the health & safety of its own employees, which is why **the company has introduced a risk control system in every plant.**

The systems specifically require all subcontractors to comply with SOLARPACK'S **Health and Safety Plan** or otherwise to develop their own individual

procedure which must be approved by SOLARPACK.

The objectives of the plan are as follows:

- Compliance with legal provisions applicable to these matters.
- Encouraging a proactive approach towards personal health and safety.
- Protecting the integrity and health of the workers involved through the application of preventive measures.
- Promoting safety as the top priority in the design, planning, training and undertaking of work.
- Encouraging employees to adopt safe and clean work practices.

SOLARPACK AIMS TO PROVIDE A OCCUPATIONAL ACCIDENT-FREE, DISEASE-FREE, HEALTHY AND SAFE WORKING ENVIRONMENT

Contractors and subcontractors are subject to contractually established minimum environmental and occupational health & safety (H&S) requirements which are applicable at every site in which SOLARPACK operates, and include the following key measures:

- Preparation and monitoring of the management of all health & safety documentations: details of company, employees, work teams, etc.
- Appointment of a Health & Safety supervisor to coordinate the company's preventive plan, adapt the working environment in preparation for the introduction of preventive measures, and implement and maintain these measures; he/she will be present to oversee the most hazardous operations.
- Management of indexes and monthly monitoring of health & safety indicators by SOLARPACK.

It should be noted that, in addition to the Health & Safety Plan (H&SP), all SOLARPACK'S internal Health & Safety procedures and the aforementioned Corporate Health & Safety Policy must be put into practice.

SOLARPACK keeps a record of all accidents involving its own staff and those of its contractors. The following Health & Safety data relate to its own staff.

⁸Frequency is calculated by dividing the number of accidents with absence from work, by the number of worked hours and multiplying the answer by one million.

⁹Severity is calculated by dividing the number of lost work days by the number of worked hours and multiplying the answer by one thousand

NUMBER OF OCCUPATIONAL ACCIDENTS BY SEX

| | 2020 | 2021 |
|--------------|----------|----------|
| Men | 5 | 7 |
| Women | 1 | 1 |
| TOTAL | 6 | 8 |

NUMBER OF OCCUPATIONAL DISEASES BY SEX

Number of occupational diseases

| | 2020 | 2021 |
|--------------|----------|----------|
| Men | 0 | 0 |
| Women | 0 | 0 |
| TOTAL | 0 | 0 |

NUMBER OF FATALITIES BY SEX

Number of fatalities (including subcontractors)

| | 2020 | 2021 |
|--------------|----------|----------|
| Men | 0 | 0 |
| Women | 0 | 0 |
| TOTAL | 0 | 0 |

ACCIDENT RATES BY GENDER

| rates | 2020 | | 2021 | |
|--------------|-----------------|----------------|------------------------------|-----------------------------|
| | Frequency index | Severity index | Frequency index ⁸ | Severity index ⁹ |
| Men | 5.72 | 0.13 | 10.55 | 0.05 |
| Women | 0 | 0 | 0 | 0 |
| TOTAL | 4.28 | 0.10 | 7.92 | 0.04 |

RISK AND INCIDENT MANAGEMENT

With a view to preventing any potential risk and/or accident, SOLARPACK has a system to ensure that whenever an employee is deployed to perform a new activity, he/she is informed of the risks, personal protective equipment (PPE) and nature of the new task.

It is important to note that if a occupational accident occurs, besides reporting it immediately to SOLARPACK, the contractor or service provider is required to investigate the accident and identify the preventive and/or corrective measures needed to appropriately control the risks. If it comes to light that a process fails to comply with the health and safety requirements specified in the H&SP, a preventive safety report must be produced for the company concerned so that corrective measures can be introduced.



8.2. Human resources to the fore

SOLARPACK'S primary HR objective is to offer an employee value proposition which successfully attracts, develops and retains the talent that the Company needs to meet its strategic objectives.

People and Organisation area is responsible for promoting the following corporate values: Integrity, Openess, Agility and High Performance. All employees are expected to embrace these values. They are designed to shape behaviour and reflect the manner in which we strive to achieve our corporate purpose.

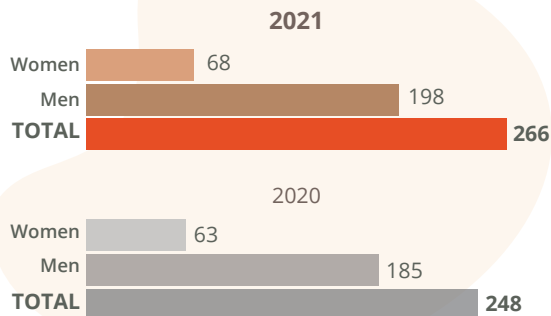
SOLARPACK believes the way we work is just as important as the things we do which is why we have used these values to create a corporate culture that permeates the entire organisation and is reflected in a range of internal regulations such as the Employee Handbook (updated in 2021) or the recently approved Code of Ethics.

AT SOLARPACK, THE WAY WE WORK IS JUST AS IMPORTANT AS THE THINGS WE DO

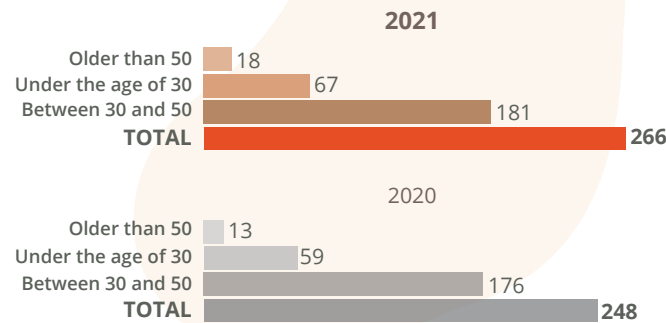
EMPLOYEES

At the end of 2021, the company employed a workforce of 266 people, characterised as follows:

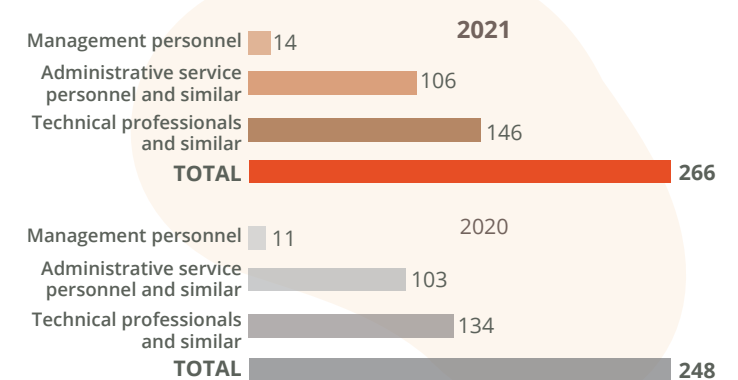
NUMBER OF EMPLOYEES AT END OF YEAR BY SEX



NUMBER OF EMPLOYEES AT END OF YEAR BY AGE



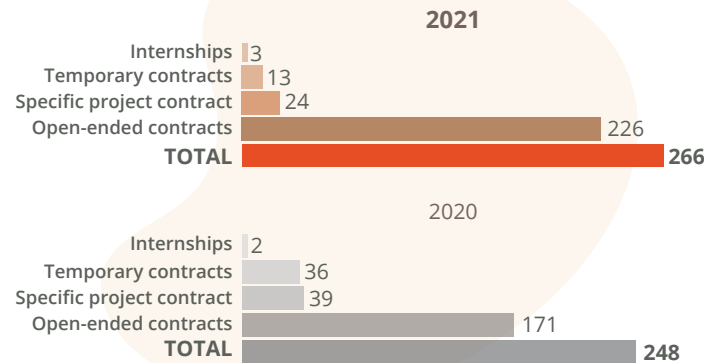
NUMBER OF EMPLOYEES AT END OF YEAR BY PROFESSIONAL CATEGORY



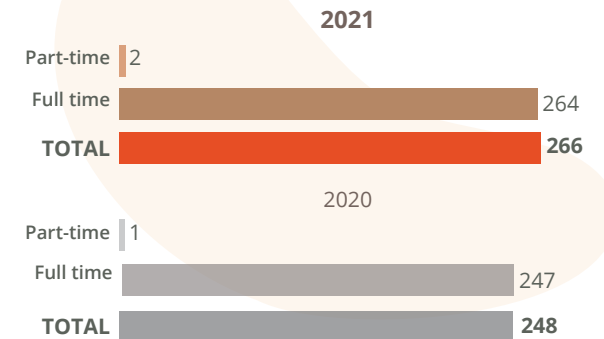
NUMBER OF EMPLOYEES AT END OF YEAR BY COUNTRY

| Number of employees | 2020 | 2021 |
|---------------------|------------|------------|
| Spain | 135 | 155 |
| Chile | 62 | 55 |
| India | 21 | 24 |
| Malaysia | 12 | 12 |
| Uruguay | 3 | 3 |
| Colombia | 2 | 3 |
| Peru | 10 | 11 |
| USA | 3 | 3 |
| TOTAL | 248 | 266 |

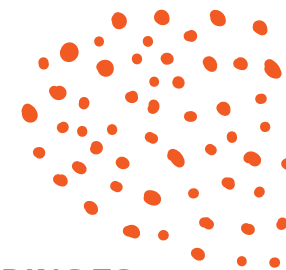
NUMBER OF EMPLOYEES AT END OF YEAR BY TYPE OF EMPLOYMENT CONTRACT



NUMBER OF EMPLOYEES AT END OF YEAR BY WORKING DAY



The data relating to the annual contract averages during the reporting period, itemised by type and sex, age and professional category, are presented below:



AVERAGE NUMBER OF EMPLOYEES ACCORDING TO CONTRACT TYPE

| | Open-ended | | Temporary | | Specific to project | | Internships | |
|--|------------|------|-----------|------|---------------------|------|-------------|------|
| | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 |
| SEX | | | | | | | | |
| Men | 147 | 118 | 22 | 17 | 23 | 42 | 0 | 1 |
| Women | 57 | 43 | 2 | 6 | 8 | 7 | 2 | 1 |
| AGE | | | | | | | | |
| Under the age of 30 | 43 | 29 | 10 | 9 | 8 | 9 | 2 | 1 |
| Between 30 and 50 | 148 | 122 | 14 | 14 | 19 | 38 | 0 | 1 |
| Older than 50 | 12 | 10 | 0 | 0 | 4 | 2 | 0 | 0 |
| PROFESSIONAL CATEGORY | | | | | | | | |
| Management personnel | 14 | 12 | 0 | 0 | 0 | 0 | 0 | 0 |
| Technical professionals and similar | 122 | 85 | 5 | 4 | 13 | 30 | 1 | 2 |
| Administrative service personnel and similar | 68 | 64 | 19 | 19 | 18 | 19 | 1 | 0 |

AVERAGE NUMBER OF EMPLOYEES ACCORDING TO WORKDAY TYPE

| | Full-time | | Part-time | |
|--|-----------|------|-----------|------|
| | 2021 | 2020 | 2021 | 2020 |
| SEX | | | | |
| Men | 192 | 176 | 1 | 1 |
| Women | 66 | 58 | 1 | 0 |
| AGE | | | | |
| Under the age of 30 | 63 | 48 | 1 | 0 |
| Between 30 and 50 | 179 | 175 | 1 | 0 |
| Older than 50 | 16 | 11 | 0 | 1 |
| PROFESSIONAL CATEGORY | | | | |
| Management personnel | 14 | 12 | 0 | 0 |
| Technical professionals and similar | 140 | 189 | 0 | 0 |
| Administrative service personnel and similar | 104 | 33 | 2 | 1 |



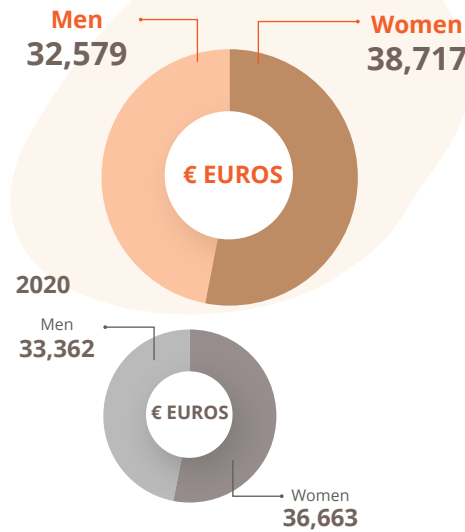
During 2021, SOLARPACK only dismissed 6 individuals, all of whom were between the ages of 18 and 50 and qualified as technical professionals, administrative service personnel and similar; six were men and one was a woman.

During 2021, as the workforce included 2 disabled employees, the company undertook another services of initiatives in accordance with the Spanish General Disability Act.

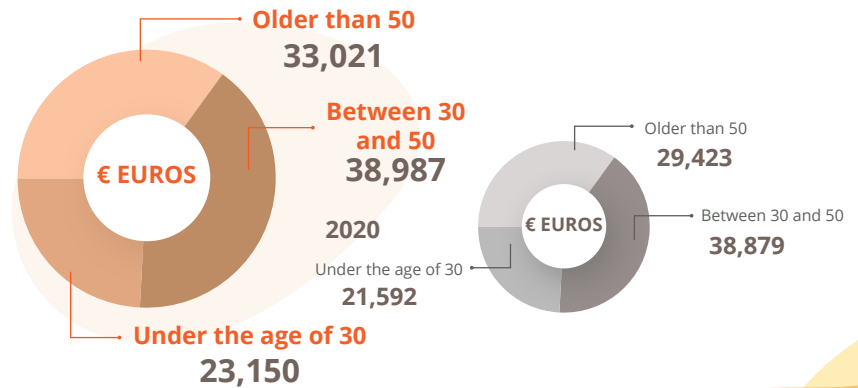
In respect of the company's remuneration policy, SOLARPACK offers an attractive pay package in keeping with sectoral and geographic trends, and subject to principles of internal equality and merit. All benefits are paid in accordance with the compulsory regulations of the respective local market.

SOLARPACK OFFERS AN ATTRACTIVE PAY PACKAGE IN KEEPING WITH SECTORIAL AND GEOGRAPHIC TRENDS, AND SUBJECT TO PRINCIPLES OF INTERNAL EQUALITY AND MERIT

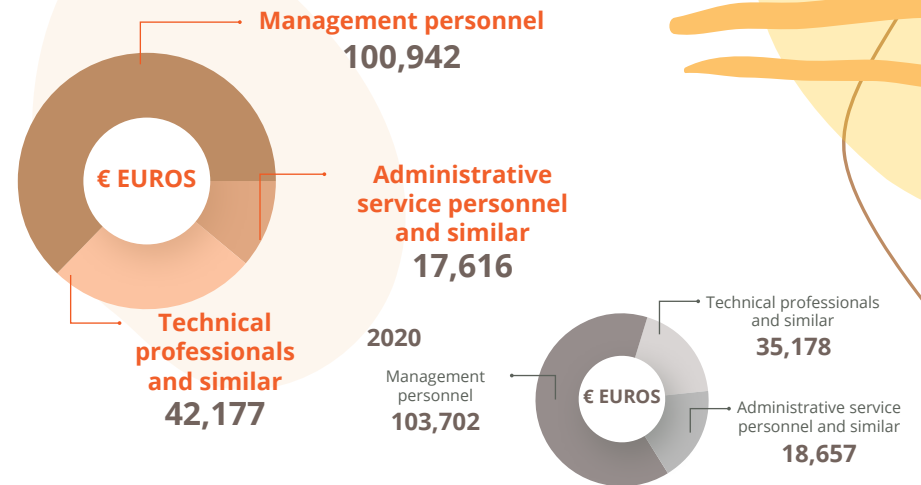
AVERAGE REMUNERATION BY SEX*



AVERAGE REMUNERATION BY AGE*



AVERAGE REMUNERATION BY PROFESSIONAL CATEGORY*

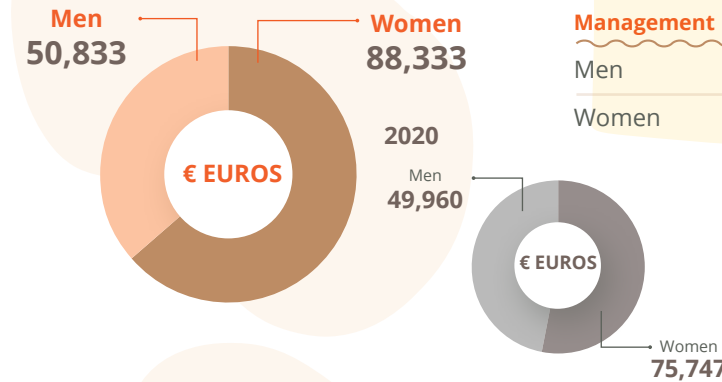


* Whole workforce considered, this is the average annual gross fixed and variable remuneration of all employees

In 2021, as professional categories were redefined, the data from 2020 were adjusted for traceability and data comparison purposes.

The following tables display the average remuneration of members of SOLARPACK'S Board of Directors and Management personnel.

AVERAGE REMUNERATION OF NON-EXECUTIVE DIRECTORS

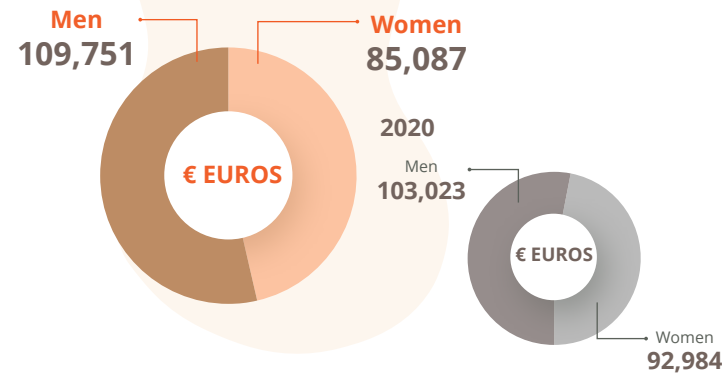


AVERAGE REMUNERATION OF EXECUTIVE DIRECTORS*

Euros (€)

| Management | 2020 | 2021 |
|------------|---------|---------|
| Men | 436,500 | 472,500 |
| Women | - | - |

AVERAGE REMUNERATION OF MANAGEMENT PERSONNEL*



* Whole workforce considered: Annual gross fixed and variable remuneration.



RELATIONS WITH EMPLOYEES

Regardless of the compulsory nature of the insurance, SOLARPACK has voluntarily subscribed to an insurance policy that covers all employees in the event of an accident occurring both on and off the work.

In 2021, SOLARPACK introduced further measures to improve social relations among its workforce, by encouraging employees to interact and learn more about the company.

In one initiative from 2021, **100% of employees took part in 'Meetings with Management'**, where groups of 10 people from different geographic locations and company departments were invited to share their doubts or concerns with the Management. A total of 20 meetings were

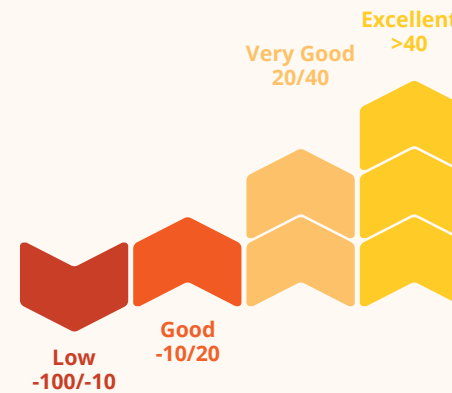
held during the year.

Another initiative involved the **suggestions mailbox yourvoice@solarpack.es**, made available to all employees for the purpose of submitting their criticisms, praise and proposals; a wide range of messages were submitted in relation to a variety of actions. As this mechanism provides a permanent line of open communication, **all SOLARPACK'S employees are given the chance to voice their opinions with the company commitment to consider any matter they wish to address.**

It should also be noted that SOLARPACK monitors the satisfaction and commitment of employees every year as part of the Organisation Climate Survey. The survey, aimed at all company employees and designed to protect anonymity and

confidentiality, was answered by 69% of the workforce.

According to the results, **95% of employees are satisfied or very satisfied to work for SOLARPACK** and the Employee Net promoter score (ENPS: % of Promoters - % of Detractors), which indicates the loyalty of our employees, was recorded at a level deemed to be very good (+31).



Source: 2018 BEX Study

In respect of employee participation and consultation, **the company has channels of communication by which every employee can express his/her opinion about any aspect of his/her professional or personal life**, such as the suggestions mailboxes. Once received, their opinions are analysed and duly processed.



WORK TIME ORGANISATION

As the company is firmly committed to helping its employees to strike the right work-life balance, it has introduced appropriate measures,

beyond those required under law, that will affect business activities and the various geographic locations in which it is active.

Work organisation procedures are set out in the Employee Handbook which specifies the work timetable, as approved by the CEO, and holiday timetable for every work site. However, project staff have a different timetable as every project is dependent on the site where the work is taking place. **The company operates according to a policy of flexible working hours (start and end times and lunch hour)** which is tailored to the particular personnel needs of the country in question.

The company also has a system to monitor absenteeism whereby the reports produced by the ERP tool are used to control the time that every employee is away from his/her work area, as well as the reason for his/her absence. As a result, in 2021, there was a total of 11,338 hours of absenteeism for a number of reasons including illness, maternity/paternity leave and unjustified absences.

On the other hand, the existing "Structure standard" has been replaced by an **'Organisation Handbook' which describes the governing bodies of SOLARPACK, and includes the functional organisation chart.** The scope of this Handbook covers all functional areas and people who are part of Solarpack, and basically defines what, how and who does the different tasks.

As regards the organisation the different job positions within the organisation, in 2021, **a 'Job Description Handbook' was produced to identify and all the job profiles which are currently part of SOLARPACK'S operations** according to its structure standard, and to specify the corresponding functions, responsibilities and minimum technical and prevention training requirements for each one.



WORK-LIFE BALANCE MEASURES

SOLARPACK has introduced various measures to help employees to strike the right work-life balance, as outlined in the Employee Handbook. They are all designed to ensure that employees are able to meet their professional objectives while still having the time for recreation and family, in light of SOLARPACK'S commitment to guaranteeing the quality of life and health of our employees.

FLEXIBLE WORKING HOURS:

Allows employees to arrange their work timetable from Monday to Friday. Flexibility in times at which employees start and finish work, and take their lunch breaks. Early-finish Fridays every week of the year (morning hours without lunch break).

FLEXIBILITY IN HOLIDAY TIMETABLE:

Holidays all year round according to professional requirements.

REDUCED WORKING DAYS:

by 2 hours in the week of local festivals.

WORKING HOURS REDUCED FOR FAMILY REASONS

WORKING REMOTELY:

In 2021, the Company gave its employees the chance to work remotely, provided that their tasks were at least partly compatible with such arrangements, in order to limit close contact during periods of peak COVID-19 infection rates, and to manage personal situations which would otherwise have been difficult to resolve. As these arrangements also limited journeys to and from work, employees were able to use that time more effectively and save on travel costs, which came as a boost to their work-life balance.

MEETINGS AND TRAINING DURING WORKING HOURS:

Meetings will be scheduled to take place before 6 p.m. Steps will also be taken to streamline meetings to save time and increase efficiency. Nor will training programmes take place outside of an employee's working hours, unless there is no other available option and the employee agrees to the scheduled time.



DIGITAL DISCONNECTION

SOLARPACK endeavours to promote the well-being of its employees according to a series of Digital Disconnection guidelines and internal recommendations, as outlined in the Employee Handbook and reproduced below:

- If several teams are working in different **time zones**, attempts will be made to maintain oral communication between the various parties during overlap times or as close as possible to the overlap, especially if the representatives' intervention is required at the same time.
- Employees should not expect to receive an immediate response to written communications which may be sent by any means outside of working hours. If the situation requires the recipient to read the communication immediately, he/she will be instructed to do so by any recorded means of delivery (telephone call, instant message, etc.).
- Telephone calls will not be made outside of the caller and recipient's working hours, except in emergencies.
- The digital tools made available by the Company will be used rationally by the employee. Whenever possible, these tools will not be used outside of the employee's working hours, except in emergencies.
- Whenever employees send e-mails outside of business hours, they should configure the delivery settings to ensure that the e-mail is delivered within the recipient's working hours. This practice will be promoted across the organisation.
- When employees are on holiday, they should indicate the contact details of colleagues who are available to address any matters or issues in their absence, by creating automatic replies with a reference to the contact details of these colleagues.



These disconnection guidelines have been implemented in light of the results of previous surveys and seek to promote a culture of respect and to help employees strike the right work-life balance, which was one of our primary objectives from last year.





8.3. Attracting and developing talent

SOLARPACK believes that professional development represents the key to attracting and retaining talent.

COMPREHENSIVE TALENT MANAGEMENT

SOLARPACK'S People management model is based on its comprehensive talent management model which applies to all employees and countries of the group. On the basis of the company's values, it inventories the skills and behaviours that are expected of our employees in the working environment. They are used to review and implement all HR procedures (recruitment, training, development and performance).

The company's training procedures are regularly reviewed and adapted to meet the needs of the company and its employees. The reorganisation of content continued in 2021 and new content has been analysed with a particular emphasis on the development of skills and technical expertise.

Development interviews determine the need for training plans which aim to enhance the skills sets and expertise of employees by improving their performance in the short term and enhancing their skills in the long term.

Based on model 70-20-10 where:

70%

of a professional's learning comes from work experience (*learning by doing*)

20%

is acquired through dialogue and continuous feedback

10%

comes from structured training courses and programmes

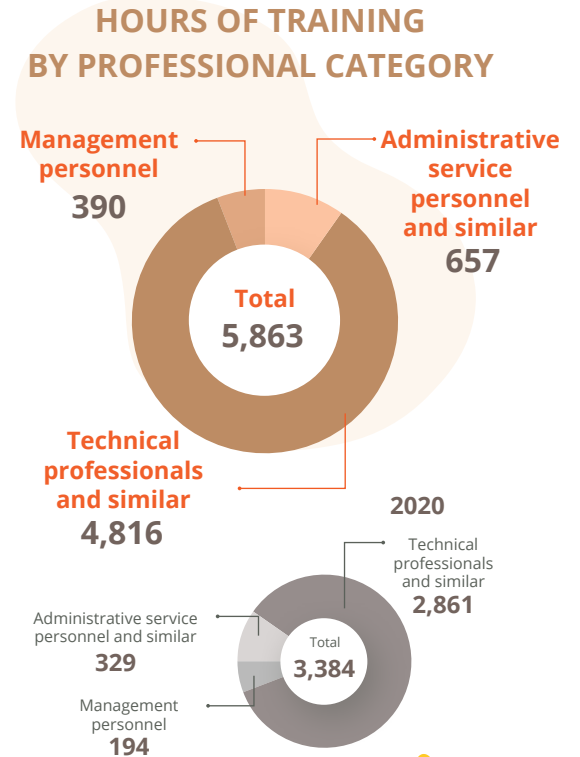
In 2021, SOLARPACK also opened a **Language School at which all employees are invited to enrol**. The teaching model involves both digital materials and one-to-one lessons.

Every employee's performance is reviewed on an annual basis with a view to improving skills sets and enhancing career prospects. As part of the annual process and according to the level of responsibility, two kinds of assessments are conducted: Assessment of **individual targets** related to the company's objectives, and performance reviews which analyse **the action taken to achieve the targets**. These behaviours, defined as skills, are based on the corporate values and define the style and culture of SOLARPACK.

The primary aim of performance reviews is to **identify strengths and areas for improvement** so as to

explore professional opportunities and enhance skills and expertise. To this end, Professional Development Interviews seek to identify targets and the actions needed to achieve these targets. The entire process is documented in an **individual development plan** which will be rolled out in the current year.

In 2021, various initiatives to develop the knowledge and abilities of SOLARPACK'S members were carried out on the basis of training courses in management, office automation and finance or relating to improvement of technical skills and languages. **The total number of training hours per professional category increased by 73% in 2021.**



On the other hand, during the execution of the projects, special training courses were provided to raise awareness of the emergency plan, work at heights, working in close proximity to energised areas, commissioning, and procedures for driving and assembling structures.

SOLARPACK held additional **training sessions which all employees were required to attend, in order to distribute its Code of Ethics and its internal Compliance rules**, as well as general awareness sessions on health, safety and cybersecurity.

Furthermore, in 2021, employees continued to attend crime prevention training programmes:

| DESCRIPTION OF INDICATOR | 2020 | 2021 |
|---------------------------------------|------|------|
| Employees trained in crime prevention | 198 | 230 |
| Crime prevention training hours | 198 | 460 |





8.4. Equality and diversity

The promotion of diversity, inclusion, equal opportunities and the well-being of our employees is intrinsically linked to some of the UN Sustainable Development Goals which SOLARPACK holds in extremely high regard, especially SDG 05 (Gender Equality) and SDG 08 (Decent Work and Economic Growth).

For SOLARPACK, the promotion of equal opportunity and diversity is key to the success of our business and our people management strategy.

Non-discrimination and equal treatment and opportunity in employment underpin SOLARPACK'S corporate culture, as set out in all the company's global procedures and its Code of Ethics.

EQUALITY

All SOLARPACK'S policies (selection, induction, training, promotion, etc.) reward **merit, training and suitability** for the required position and do not discriminate against candidates and/or employees on grounds **unrelated to the required skills**.

Moreover, as outlined by its Code of Ethics, the company undertakes to create a working environment in which all people are treated with dignity and respect and where any forms of **abuse, bullying, harassment** and/or discrimination are not tolerated. If an employee encounters any conduct of this kind, he/she must report it immediately via the **Reporting Channel** described above in section 6.3.2 Crime Prevention and Detection System. Working relationships will be courteous and respectful, and there will be a zero-tolerance approach to any form of discrimination and/or abuse or bullying.

While its commitment to equality is about much more than gender, this aspect is a particular focal point of the company's efforts in this regard.

By the end of the period, **25% of SOLARPACK'S workforce was female**; in the case of Spain, this figure rose to 33%

SOLARPACK also endorses the principle of equal pay and **regularly conducts reviews in order to identify potential wage gaps**. Wage rises are awarded on merit and particular steps are taken to ensure that the salaries of women are comparable to all other employees who operate in the same department or who have similar qualifications or occupy comparable roles within the organisation.

GENDER WAGE GAP*

| | Women | Men | Overall total | Gap |
|---|-----------|------------|---------------|------------|
| Administrative personnel and similar | 14 | 92 | 106 | 1% |
| Director | 4 | 9 | 13 | -15% |
| Technical profess. and similar | 50 | 97 | 147 | -2% |
| OVERALL TOTAL | 68 | 198 | 266 | 16% |

* Workforce numbers applicable as of 31 December 2021. Includes projected annual gross fixed and variable salary in Euros. The following formula is used to determine the pay gap: $(\text{Average Women} - \text{Average Man}) / \text{Average Man}$, expressed as a percentage

A more in-depth analysis of wage data shows that locations with a number of employees in excess of 10% and representing 79% of employees on 31 December 2021 produce a wage gap of less than 1%.

In all countries not analysed in this respect, the workforce is less than 10% and their gender and professional category distribution is such that the indicator cannot be validly interpreted.

DIVERSITY

SOLARPACK fosters diversity in its broadest sense, extending to gender, experience, knowledge, age, culture, nationality, seniority, etc. The company believes that it **contributes to the best performance of the organisation and facilitates a proper balance in the organisation as a whole.**

As outlined in the Code of Ethics and SOLARPACK'S Employee Handbook, the Company considers it essential to promote a **quality working environment based on respect, diversity and equality.** Therefore, it forbids discrimination on the grounds of race, ethnicity, religion, political affiliation, trade union membership, nationality, language,

gender, marital status, social status, age, disability, sexual orientation or any other condition.

SOLARPACK engages in **awareness campaigns with all stakeholders to promote a diverse and inclusive culture,** and uses all its communication channels to raise the profile of International Women's Day, International Day of Disabled People, Day for the Elimination of Violence against Women and International Human Solidarity Day.

By recruiting staff with different backgrounds, SOLARPACK promotes an inclusive corporate culture in which different perspectives and experiences are

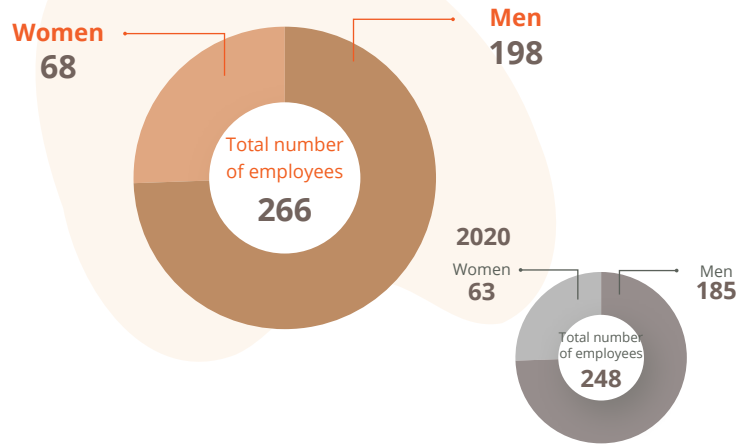
embraced, and every employee is given the opportunity to contribute individually and collectively to the organisation.

In 2021, SOLARPACK'S workforce included 2 disabled persons: one with mobility issues and the other with a visual impairment.

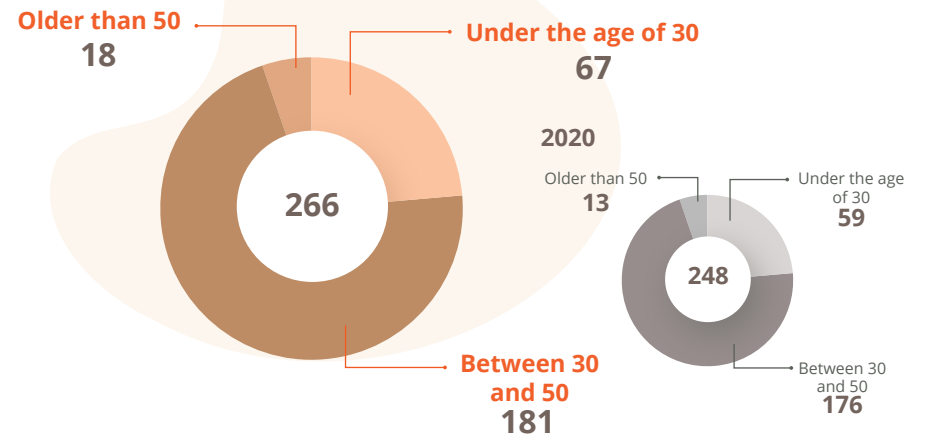
THE WORKFORCE INCLUDES 8 DIFFERENT NATIONALITIES AND THE CREATIVE AND MULTICULTURAL POTENTIAL THAT SUCH DIVERSITY BRINGS TO THE WORKING ENVIRONMENT IS HIGHLY VALUED



NUMBER OF EMPLOYEES AT END OF YEAR BY SEX



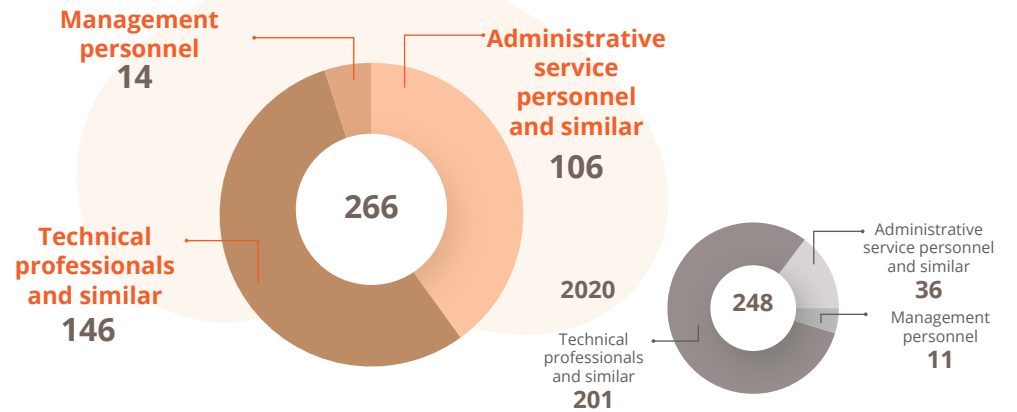
NUMBER OF EMPLOYEES AT END OF YEAR BY AGE



NUMBER OF EMPLOYEES AT END OF YEAR BY COUNTRY

| Number of employees | 2020 | 2021 |
|---------------------|------------|------------|
| Spain | 135 | 155 |
| Chile | 62 | 55 |
| India | 21 | 24 |
| Malaysia | 12 | 12 |
| Uruguay | 3 | 3 |
| Colombia | 2 | 3 |
| Peru | 10 | 11 |
| USA | 3 | 3 |
| TOTAL | 248 | 266 |

NUMBER OF EMPLOYEES AT END OF YEAR BY PROFESSIONAL CATEGORY*



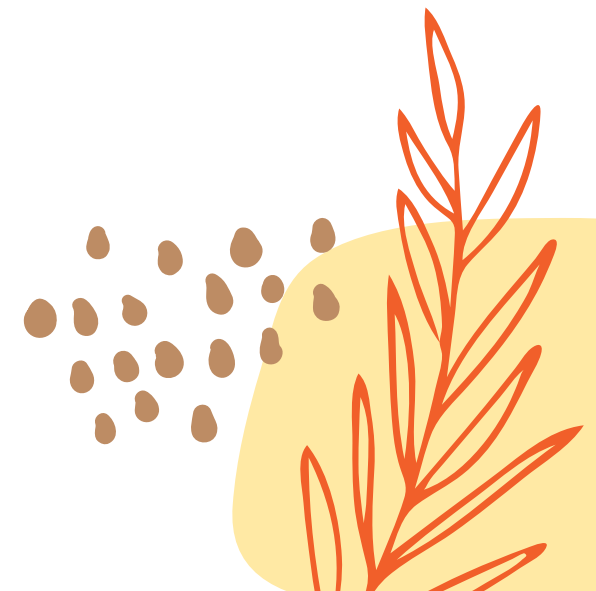
*In 2021, as professional categories were redefined, the data from 2020 were adjusted for traceability and data comparison purposes.

SOCIAL INITIATIVES UNDERTAKEN IN 2021

- Review and approval of the **Health & Safety Policy**.
- **ISO 45001** certification obtained in Spain and **Health & Safety Management System** introduced in working environment in accordance with the requirements of that standard
- **Digital Disconnection** guidelines and internal recommendations established
- **Comprehensive Skills Management System consolidated:** (i) training hours up by 73% and (ii) 77% of the workforce have their own Individual Development Plan.
- **Equality Commitment Letter signed by the Management** to reassert their specific pledge to SDG 5 - gender equality.
- In Spain, a **pay review** has been carried out, an **equal treatment and opportunity assessment** has been produced and an **Equality Plan** has been devised. The presentation of this plan to stakeholders is currently pending; it is expected to be introduced in early 2022.
- **Review of internal People policies** and incorporation of principles of equality, diversity and non-discrimination.
- **Signatory of Women's Empowerment Principles, WEP** <https://www.weeps.org/company/solarpack-corporacion-tecnologica-sa>) to promote gender equality and women's empowerment in the workplace, market and community.
- **Participation in Target Gender Equality (TGE)**, a gender equality accelerator programme for signatories of **UN Global Compact**. Helping businesses to set and achieve ambitious corporate targets regarding the representation and leadership of women.

MAJOR CHALLENGES IN 2022

- Incorporation of Health & Safety targets into corporate objectives related to annual variable remuneration.
- Establish programmes to increase the proportion of women in the global workforce.
- Maintain the % of national employees globally.
- Establish an Equality and Diversity Policy.
- Extend measures to help employees to strike the right work-life balance and introduce internal diversity and equality training programmes.



9. Managing a sustainable value chain

Social Action
Respect for Human Rights
Suppliers
Customers





9.1. Social Action

The commitment to sustainability and social responsibility is a core element of SOLARPACK'S business strategy. The 2021-2023 ESG Plan prioritises Social Action and the Promotion of Sustainable Development.

In this capacity, the Social Action Policy was devised in 2021. It aims to **make a positive global impact** particularly in communities in which SOLARPACK operates, by promoting and introducing a programme of **social measures underpinned by its purpose and commitment to the Principles of the Global Compact, the 2030 Agenda and the Sustainable Development Goals** which the company holds in extremely high regard.

SOLARPACK'S social action is driven not by some legislative requirement - on no account is the objective of the measures it takes compensatory - but by an aspiration to contribute to economic and social development through knowledge, availability and resources.

The Plan interweaves social contribution and business activity through social projects aimed at promoting SDG, especially 4 and 7 which seek to ensure inclusive and equitable quality education and access to affordable, reliable, sustainable and modern energy for all.

THE 2021-2023 SOCIAL ACTION AND SUSTAINABLE DEVELOPMENT PLAN, WITH AN ALLOCATED BUDGET OF MORE THAN € 2.6 MILLION OVER THAT PERIOD, HAS BEEN FORMULATED AND INTRODUCED

THE 2021-2023 SOCIAL ACTION PLAN IS DESIGNED TO SUPPORT COMMUNITIES THROUGH PROJECTS DELIVERING ACCESS TO CLEAN AND AFFORDABLE ENERGY, AND PROMOTING SOCIO-ECONOMIC DEVELOPMENT THROUGH EDUCATION

2021-2023 SOCIAL ACTION PLAN

The Plan is divided into **four strategic axes**. The first involves the **promotion of universal access to energy**, and is directly related to SOLARPACK'S purpose: "to accelerate the transition to clean and affordable energy for all". To this end, SOLARPACK has signed a partnership agreement with the EKI Foundation to supply and fund photovoltaic solar installations with a view to generating electricity in educational centres, healthcare centres and other community service buildings deprived of a stable and clean electricity supply; and to provide professional photovoltaic training programmes.

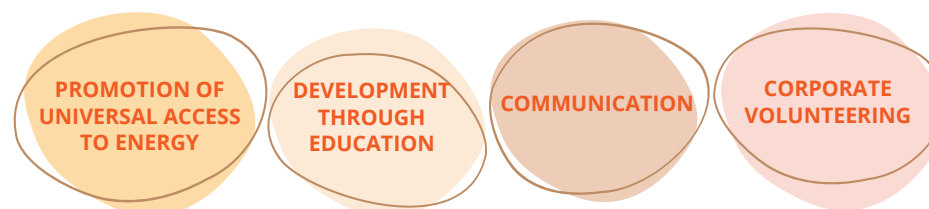
The plan's second strategic axis involves **development through education**, with the aim of advancing and improving the socio-economic system of the communities in which the company's projects are based; in this respect, quality education can drive sustainable development through social, environmental and professional photovoltaic training projects.

The third and fourth axes are **communication and corporate voluntary schemes** respectively. They represent a broad range of measures which seek to promote and foster sustainable development and create

a culture of cooperation and solidarity across the company in general, and among the employees in particular, by nurturing and providing an outlet for their social conscience.

SOLARPACK'S initiatives take place both in Spain and in several developing countries, in cooperation and alliance with public and private entities, foundations and non-profit organisations. This approach guarantees the effectiveness and efficiency of the support provided, as it means that **initiatives and contributions, as well as their impact, can be monitored at all times.**

STRATEGIC AXES



COMMITMENT TO LOCAL COMMUNITIES

For SOLARPACK, it is important to communicate with local communities and to involve them in the company's projects. It incorporates social, ethical and sustainable practices into the design, development and operation of its photovoltaic plants.

At every stage in the life cycle of the plant, SOLARPACK engages with local communities by **listening to and discussing their concerns in a spirit of cooperation and respect**. It also sets out its stall to forge long-term relationships with the communities of the area in which the plant is based, and factors these considerations into its environmental and social impact assessment.

In order to consult and exchange ideas with all stakeholders, the company maintains a fluid and permanent channel of communication with local authorities and community leaders, to explain the scope of projects, respond to their questions, develop a clearer understanding of the social environment and attempt to meet their needs in the best possible way. By working closely alongside local communities, **projects are co-designed from the outset** to prevent or mitigate any risk and to maximise the benefits for the environment and local inhabitants.

In addition to the clean and sustainable energy it produces, **SOLARPACK contributes to local development by creating direct and indirect employment opportunities**. Its commitment to local communities is exemplified by the employment opportunities open to the local population, as shown in the following table:

NUMBER OF EMPLOYEES FROM THE LOCAL COMMUNITIES

| <i>Number of employees</i> | 2020 | 2021 |
|----------------------------|------------|------------|
| Spain | 135 | 149 |
| Chile | 62 | 42 |
| India | 21 | 24 |
| Malaysia | 12 | 12 |
| Uruguay | 3 | 3 |
| Colombia | 2 | 2 |
| Peru | 10 | 11 |
| USA | 3 | 3 |
| TOTAL | 248 | 246 |

SOLARPACK OPERATES A SPECIAL CHANNEL OF COMMUNICATION TO RECEIVE AND PROCESS THE COMPLAINTS AND/OR QUERIES OF THE LOCAL COMMUNITIES IN EVERY COUNTRY IN WHICH IT OPERATES





MANAGING COMMUNITY RELATIONS

During construction of photovoltaic plants, a community relations officer is responsible for ensuring that the needs identified in the community relations programme are met.

The aim of the programme is to put in place an **interactive communication and participation system** for the communities of the area in which the company's plants are based, with a view to fostering social development.

In every country in which the company is active, SOLARPACK operates a **special channel of communication to receive and process the complaints and/or queries of local communities** during construction and operation, not only to guarantee compliance with legal obligations and environmental requirements, but also to give a voice to the communities and implement a feedback system to provide an appropriate response to their needs and considerations.

PROGRAMME OF COMMUNITY RELATIONS

1. To provide the management framework for communications and community relations both internally and between the company, contractors and workers, and the community.
2. To develop sub-programmes to promote the recruitment of local workers and development of local suppliers.
3. To establish a code of conduct and a monitoring and surveillance programme.
4. To generate continuous and fluid communication between the Company, the populations close to the area of influence and the local authorities.
5. To stress the importance of the use of alternative energies and their operating process and contribution to local and international development.

SOCIAL ACTION INITIATIVES UNDERTAKEN IN 2021

SPAIN

Conference of Lo Que De Verdad Importa (What Really Matters Foundation) Bilbao 2021 LQDVI Foundation



Values through Education



Support

for the promotion and dissemination of universal human values such as overcoming adversity, responsibility, respect and solidarity



6,493 views

showing support for sustainability, inclusion and efforts to overcome adversity



10 connected

educational centres

Promotion of educational and inclusive sport Getxo Rugby



Values through Education



People with an intellectual disability can enjoy rugby



Shared values

of effort, overcoming adversity and teamwork are disseminated



Extraordinary support

to the remarkable work done by Getxo Rugby to promote inclusive rugby and women's rugby, and to make rugby the school sport for young children



PARTNERSHIP WITH THE EKI FOUNDATION



In 2021, SOLARPACK signed a **partnership agreement with the EKI Foundation** to install photovoltaic solar installations in educational centres, healthcare centres and other community service buildings in developing countries.

This strategic alliance has enabled SOLARPACK to forge links with Impact Africa, an impact investment fund launched by the EKI foundation and focal point of an ambitious investment vehicle plan for **photovoltaic solar installations in Sub-Saharan Africa**. The aim is to consolidate an imitable, scalable and reproducible electrical infrastructure financing model in order to allocate sufficient resources to this infrastructure which is key to unlocking economic growth and, in the process, extend access to a high-quality electrical service with clean and renewable energy.

Moreover, as a result of this partnership, **professional photovoltaic training programmes** have been organised as part of a second initiative endorsed by the EKI foundation with a view to training local specialists to assist with the installation and maintenance of installations, and creating “green” employment opportunities for the locals.

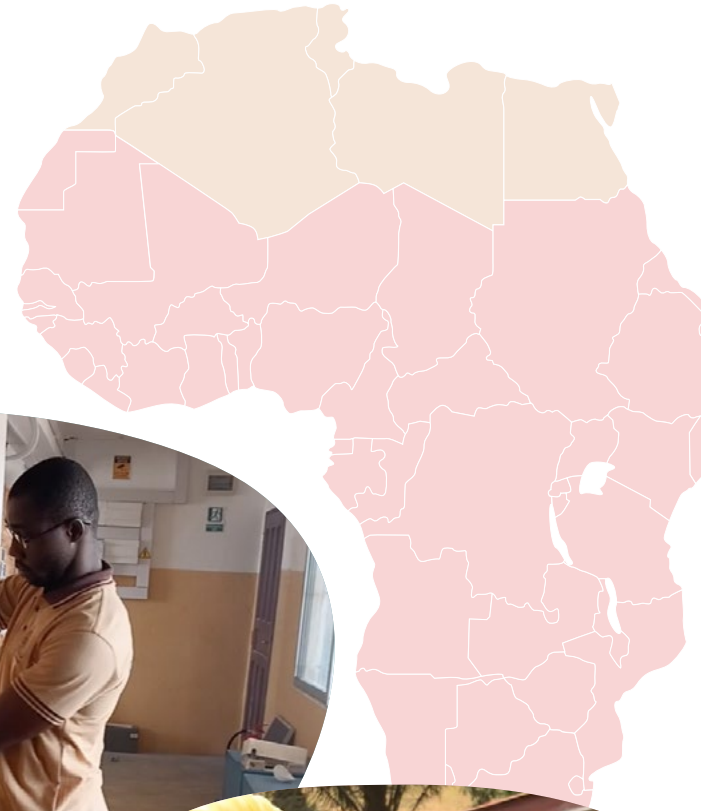


PARTNERSHIP WITH THE EKI FOUNDATION

Supporting the work of EKI to supply and fund photovoltaic solar installations in schools, healthcare centres and community centres



 Sub-Saharan Africa



Access to energy and education



13 installations

supported



6 countries

(Kenya, Malawi, DR Congo, Sierra Leona, Liberia and Mali)



166.17 KW

installed



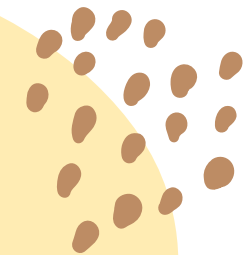
2 initiatives

Launched to provide professional photovoltaic training (Liberia and Burundi)



15 young people

have completed photovoltaic course in Liberia (14 boys and 1 girl)



CHILE



Promotion of dressmaking venture of the women's "Mujeres a tu Medida" association




 La Tirana, Pozo Almonte

Education and business ventures



10 women

female entrepreneurs are trained in sewing techniques and business practices



50 families

are less vulnerable as they receive a larger stable income



600 people

benefit from accessible local trade



Digital literacy and refurbishment of community cyber-space



 Santa Emilia, Pozo Almonte

Education and community development



140 people

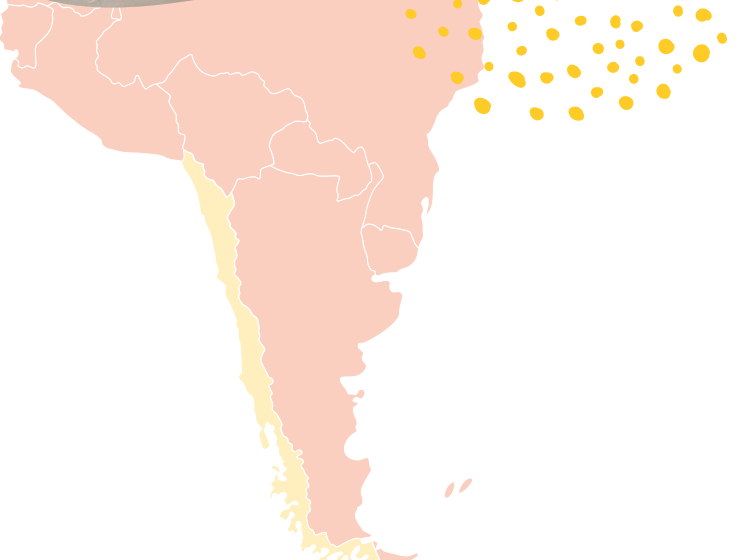
have access to digital literacy workshops



600 people

benefit from cultural recreational activities





CHILE



Support for the community cultural activities of the commune of Pozo Almonte



La Tirana, Pozo Almonte

Education and community development



Support

to organise a range of community cultural activities in La Tirana (children's workshops during the holidays, local cultural events, fairs, etc.)

Photovoltaic solar installation in the "Oasis del Desierto" school



Pintados, Pozo Almonte

Education and access to energy



85 children

between the ages of 5 and 13 and their teachers have permanent access to renewable energy in the school

Support for the "Recetas de Amor" soup kitchen of the Warakusi Cultural Centre



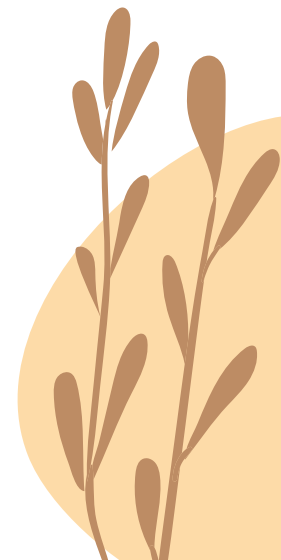
La Tirana, Pozo Almonte

Community emergency



50 elderly people

in a situation of extreme vulnerability receive food and companionship





INDIA

Post-COVID emergency assistance in Telangana



Telangana



Healthcare emergency



10,000 people

living in poverty in the cities, towns and villages of Telangana have their basic needs covered by the distribution of food and hygiene parcels



Improved education standards in Karnataka



Karnataka



BREADS
Bengaluru Rural Educational and Development Society

Education



486 students

from 5 schools have access to equipment and education materials to guarantee their right to quality education



Post-COVID emergency assistance in Karnataka



Kalaburagi y Mysore



BREADS
Bengaluru Rural Educational and Development Society

Healthcare emergency



2,700 people

in a vulnerable situation receive food and hygiene parcels to mitigate the effects of the post-COVID emergency in various communities of Karnataka

PERU **ODP** Jesuitas del Perú

Women of Tacna free from violence



Education, business ventures, women

victims of gender-based violence receive psychological and emotional support **114**
 victims of gender-based violence are trained in business practices **55**



10 women receive seed capital for their business venture
9 female community leaders are trained to promote the prevention of gender-based violence



Entrepreneurs and owners of micro businesses are bolstering their capacities in preparation for the post-Covid economic recovery



Business ventures and education



582 entrepreneurs
 (192 men and 390 women) have received training in business practices



2,328 people have better access to food, education and healthcare



Promoting the Virtual Platform "Moquegua Emprende" (www.moqueguaemprende.pe)





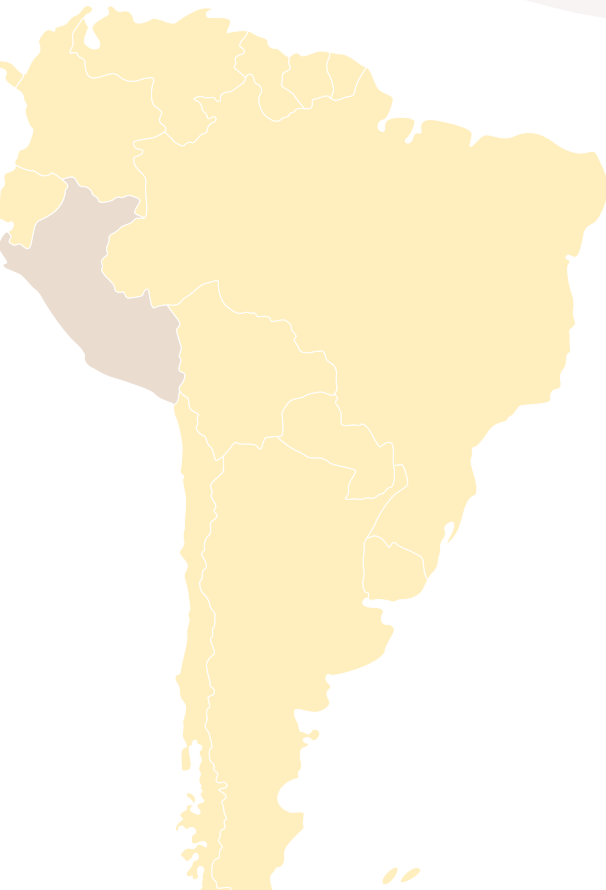
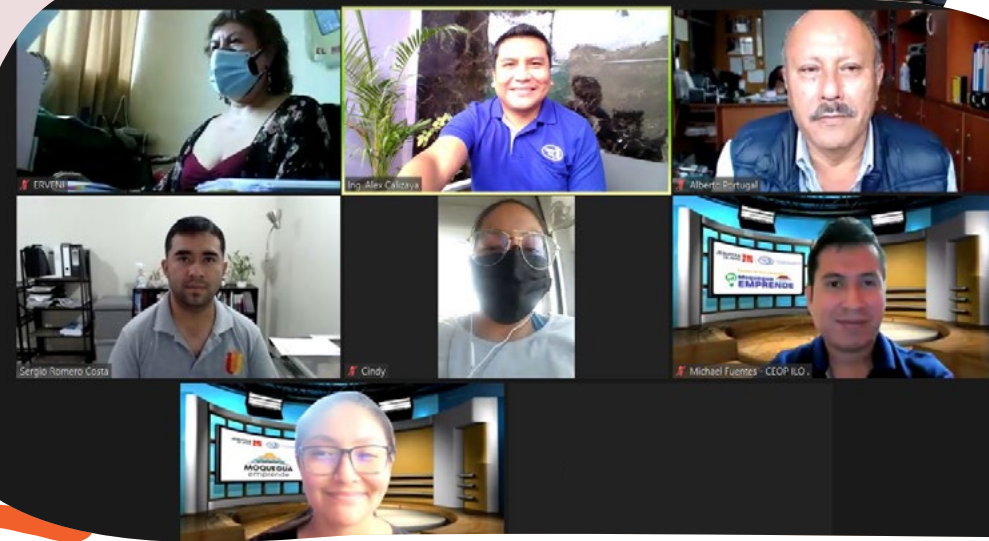
Ecology advocacy campaign: Súmale Energía al Mundo 2021

Sustainable development and education



75 leaders

supported to present an environmental agenda that champions the 2030 National Environment Policy



MAJOR CHALLENGES IN 2022

- Continue and extend the **strategic partnership with the EKI Foundation** as part of a drive to universalise access to clean energy.
- Identify and introduce **new initiatives** to foster social development in local communities by prioritising education.
- Endorse measures to **create employment opportunities** for local populations, especially vulnerable people.
- Continue to promote and incorporate social, ethical, and sustainable practices into the company's plants based on **community relations programmes**.
- Strengthen relationships with local communities to **increase the involvement** of local authorities, beneficiary populations and the various stakeholders of beneficiary communities **in the identification, design and monitoring** of social initiatives.
- Participate in social action forums and encourage **SOLARPACK'S employees to take part in the company's social initiatives**.
- Launch **corporate voluntary schemes**.

CONTRIBUTIONS TO NON-PROFIT ENTITIES

All these projects are carried out in addition to the contributions that SOLARPACK makes to various non-profit entities, as shown in the following table:

CONTRIBUTIONS TO NON-PROFIT FOUNDATIONS AND ENTITIES

| Euros (€) | 2020 | 2021 |
|--------------|-----------------|------------------|
| TOTAL | 99,416 € | 364,578 € |





9.2. Respect for Human Rights

Human rights are the bedrock of SOLARPACK'S responsible corporate approach to its business activities both in Spain and across the rest of the world.

The company maintains the utmost respect for them and for public freedoms in its business activities, guaranteeing respect for fundamental rights, the principles of equal treatment, opportunities, non-discrimination and respect for diversity, rejection of child labour and forced or compulsory labour.

From SOLARPACK'S perspective, respect for human rights is part of an ongoing process to identify, prevent, mitigate, remedy and report the actual or potential adverse effects of its business activities on human rights, in accordance with the Guiding Principles on Business and Human Rights of the United Nations.

SOLARPACK has observed that Human Rights violations are most likely to occur in employment processes, e.g. discrimination or forced labour in the supply chain. All initiatives carried out in 2021 set out to minimise these risks.

IN 2021, SOLARPACK DID NOT RECEIVE ANY REPORTS OF HUMAN RIGHTS VIOLATIONS

HUMAN RIGHTS INITIATIVES UNDERTAKEN IN 2021

- Production and introduction of the Human Rights Policy
- Production and introduction of the Code of Ethics
- Production and introduction of the Code of Ethics for suppliers
- Inspections in accordance with the Supplier Approval Procedure.
- Training for employees in relation to the Crime Prevention System and the use of the reporting channel, as a preventive measure

MAJOR CHALLENGES IN 2022

- To devise a due diligence process in accordance with EU Directives
- To establish supplier and contractor impact controls in accordance with EU Human Rights Directives



9.3. Suppliers

In this day and age, it is becoming more and more important to manage supply chains in a responsible manner. The effective management of suppliers and subcontractors enables businesses to prevent risks to their reputation, operations and ESG.

Consequently, SOLARPACK'S supplier and subcontractor management strategy is based on several criteria relating to environment, quality, health and safety and corporate social responsibility.

The company has developed a risk map to identify certain aspects related to its supply chain that may adversely affect business activities, such as manufacturing delays, specific risks related to technical specifications, price rises in raw materials (especially copper and aluminium) and photovoltaic modules, delays in transport to the plant construction area caused by

weather conditions, delays in customs management or transport price rises, etc.

Other identified supply chain risks relate to issues of human rights violations, corruption, bribery or the health and safety of subcontractors.

SUPPLIER APPROVAL

To ensure compliance with the Company's requirements, mitigate risks and guarantee the quality of goods, equipment, services or contracted work, SOLARPACK will not conclude a commercial relationship with any supplier until it has been approved according to the criteria of the supplier approval procedure, to the extent that the supplier's operations affect the quality of the product or service specified by a Customer or the company deems the approval to be necessary in view of the nature of the activity or service in question.

The approval process will depend on the kind of supplier in question and will therefore require different documentation.

All SOLARPACK'S Suppliers, save for those whose services or products have no bearing on the quality or service of projects, are required to accept the following documents before they are approved:

- **The Supplier Quality, Environment, Health & Safety and Corporate Social Responsibility Requirements**, which cover aspects related to ESG. They set out key health & safety and environmental indicators that contractors are required to report to SOLARPACK on a monthly basis. This document also authorises SOLARPACK to inspect the operations and materials of suppliers and subcontractors at any time during the project work and services. Details of these inspections are included in the specially-adapted Quality Plans for every project. In 2021, site inspections were limited by the COVID-19 situation.
- **The Code of Ethics**, which encourages suppliers, contractors and partners to carry out their activities in accordance with best practices, complying with internationally accepted standards regarding transparency and business ethics, human and social rights, health and safety, quality and the environment.
- **Environmental Management Plan**, a document which contractors are required to accept as part of any project contract. The environmental aspects and related impacts of contractors are assessed and detailed in this Plan.

For non-exempt suppliers, Corporate Social Responsibility consultations are also included (for information purposes) and any existing environmental management documentation is requested. If suppliers (contractors included) do not have a certified environmental management system in place, SOLARPACK generally requires them to confirm that raw materials and resources are used rationally, and to formally pledge that their waste will be appropriately managed in accordance with current regulations; SOLARPACK may instruct suppliers to submit documentation in support of the above.

Furthermore, **any suppliers deemed to be high risk will, in addition to the approval process, be subject to a due diligence procedure** overseen by the

Compliance Officer. SOLARPACK considers high risk suppliers those who provides the contracted services on behalf and in representation of any SOLARPACK company for the purpose of:

- Obtaining the licences or permits needed to connect, construct or interconnect a project
- Purchasing or leasing land for a project
- Obtaining agreements for the long-term sale of energy (PPA) or turnkey construction (EPC)
- Providing the services indicated in the previous points which involve direct or indirect dealings with public authorities

INSPECTIONS OF SUPPLIERS

In 2021, **24 inspections** were conducted. The outcome of **every single one was favourable**. These inspections took place on projects such as Cortijo, Recoleta, Copihue, Moya, San Antonio, 3SP (Malaysia) and Tejada. These inspections included 2 audits carried out at the factories of the module producer by Enertis Solar S.L. in China.

INSPECTIONS OF SUPPLIERS

| <i>Number of inspections</i> | 2020 | 2021 |
|-------------------------------|------|------|
| Number of inspections | 35 | 24 |
| Outcome of inspections | | |
| Rating (%) | 100 | 100 |

SUPPLIER MANAGEMENT INITIATIVES UNDERTAKEN IN 2021

- Production and introduction of the Code of Ethics for suppliers
- Update of Supplier Approval Procedure
- 514 suppliers approved in 2021
- 24 inspections of suppliers, all of them with favourable outcome

MAJOR CHALLENGES IN 2022

- Continue to implement the inspection plan according to the project Quality Plan, the Code of Conduct for Suppliers and in the Supplier Approval Procedure.
- Produce special satisfaction surveys for suppliers and subcontractors, and introduce corrective measures based on the results.
- Select the most important suppliers (by subcontracting levels) and devise scope of audits to be conducted.





9.4. Customers

SOLARPACK prioritises quality and the delivery of appropriate responses to the needs and exceptions of its customers

The security of a job ultimately rests on quality, which is why SOLARPACK prioritises service quality.

That is why the Company has approved a Quality Policy, which is made available to all stakeholders on the [website](#), and devised a Quality Plan for projects in progress. These procedures set out established compliance levels and contain indicators by which to assess quality level according to the following objectives:

- Compliance with the quality requirements specified in the project's technical specifications.
- Resolution of non-conformities in accordance with procedures established by SOLARPACK.
- Continuous improvement based on the analysis and assessment of proposed corrective measures.

As it is in SOLARPACK'S interest to guarantee the security of its customers, the Company securely processes the data of its partners using the resources required to manage accounting and management records in the Company's Administration and Asset Management department or in the department responsible for their management.

DATA PROTECTION

SOLARPACK guarantees that the personal data processed internally is done so with complete respect for peoples' dignity and their fundamental rights and freedoms, in accordance with the provisions of Data Protection regulations currently in force.

The Supervisory and Control Body must be immediately informed of any data protection violations or any suspected or confirmed cases of security breaches.

All SOLARPACK employees are also required to sign a Non-Disclosure Agreement which regulates access to any restricted information to which employees are, or may be, privy in the performance of their professional duties.

ADDRESSING COMPLAINTS AND CLAIMS

SOLARPACK treats the opinions of its customers with the respect they deserve, processes all complaints, and generally acts with due diligence in response to any issues raised by its customers. If any disputes arise, the corresponding project manager maintains fluid interaction with the customer and is responsible for deploying the necessary resources to resolve the matter.

CUSTOMER INITIATIVES UNDERTAKEN IN 2021

- Establishment of the Quality Management System certified in accordance with ISO 9001
- Approval of Quality Policy
- Development of systems to exclusively address customer complaints

MAJOR CHALLENGES IN 2022

- Creation of customer and partner satisfaction surveys, while encouraging them to take part in the process
- Continuous improvement of Quality Management System



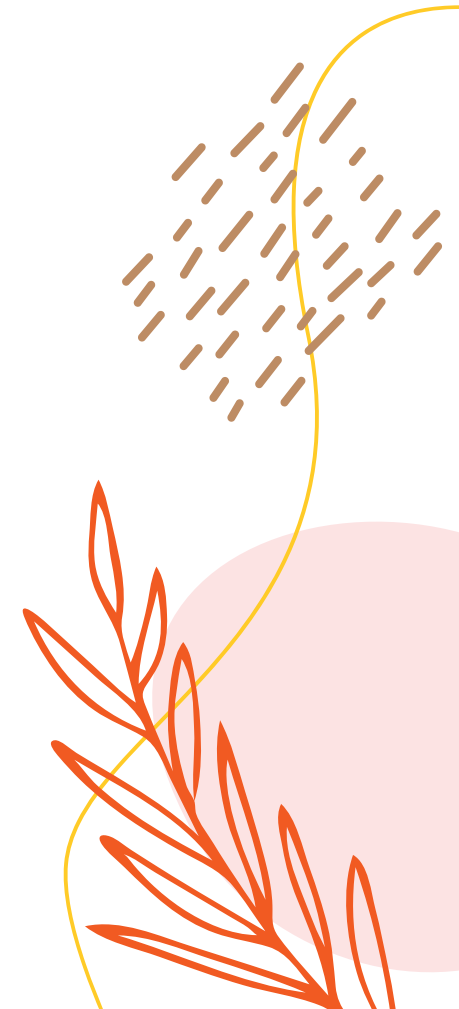
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Annex I:
List of indicators



TCFD

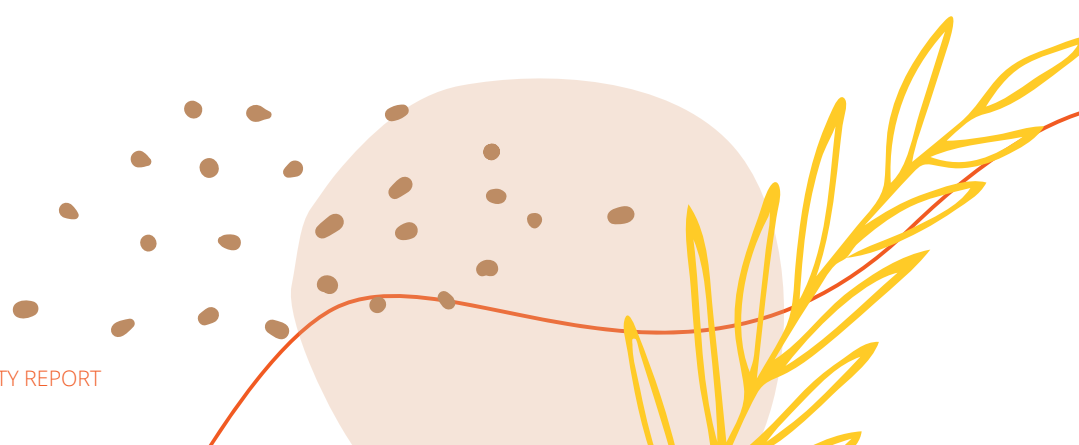
| MATTER | METRIC | CHAPTER OF REPORT |
|------------------------|---|---|
| BUSINESS MODEL | Board Oversight | 5.2 Our relationship with stakeholders 6. Setting an example through governance 6.1 Good governance and transparency 6.3 Risk management and Compliance |
| | Management Function | 5.2 Our relationship with stakeholders 6. Setting an example through governance 6.1 Good governance and transparency 6.3 Risk management and Compliance |
| STRATEGY | Description of risks and opportunities | 6.3 Risk management and compliance |
| | Risk impact and opportunities | 6.3 Risk management and compliance |
| | Resilience | 6. Setting an example through governance 6.3 Risk management and Compliance |
| RISK MANAGEMENT | Organisation to identify and assess risks | 6.2 Regulatory instruments 6.3 Risk management and compliance 7.1 Climate action |
| | Organisation for risk management | 6.1 Good governance and transparency 6.2 Regulatory instruments 7.1 Climate action |
| | Integration in general risk management | 6.1 Good governance and transparency 6.2 Regulatory instruments 6.3 Risk management and compliance 7.1 Climate action |
| METRICS AND OBJECTIVES | Report of metrics and objectives used | 7.1 Climate action |
| | GHG scope 1, 2, 3 emissions report | 7.1 Climate action |
| | Objectives and performance report | 4.2 Purpose and values geared towards the challenges of the future 5.1 Our 2021-2023 Strategic ESG Plan 5.4 2030 Agenda 6.1 Good governance and transparency 7.1 Climate action |



GRI

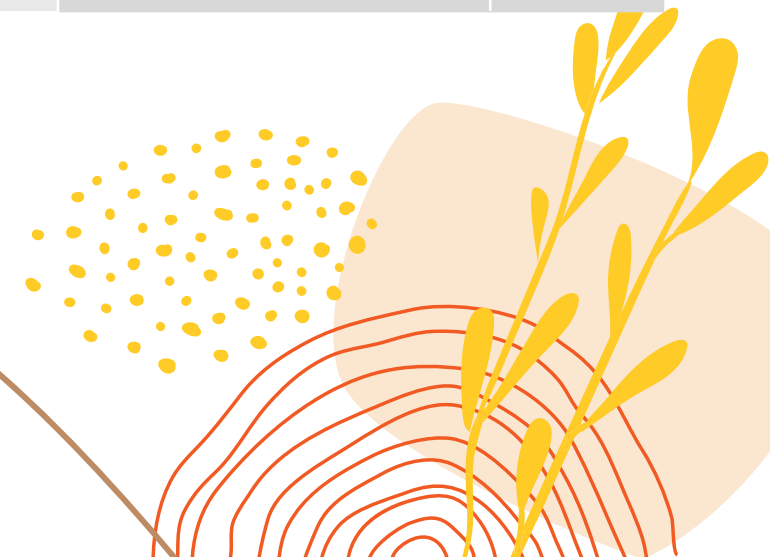
| CONTENT | DESCRIPTION | REFERENCE FRAMEWORK (GRI performance indicators or internal framework) | CHAPTER OF REPORT | PAGES / REASON FOR OMISSION |
|---|--|---|--|-------------------------------|
| GENERAL | | | | |
| BUSINESS MODEL | Brands, products and primary services, including an explanation of any product or service that is banned on certain markets Location of head office Location of operations Size of organisation | 102-2 102-3 102-4 102-7 | 4.1 Business model and geographic presence | 12-18 |
| BUSINESS ENVIRONMENT | Markets served, and include i) the geographic locations in which the products and services are offered; ii) the sectors served; iii) types of customer and beneficiary. | 102-6 | 4.1 Business model and geographic presence 4.2 Purpose and values geared towards the challenges of the future | 12 - 18 19 - 23 |
| OBJECTIVES AND STRATEGIES | A description of the main impacts, risks and opportunities | 102-15 | 5.1 Our 2021-2023 Strategic ESG Plan | 25 - 28 |
| FACTORS AND TRENDS THAT MAY AFFECT PERFORMANCE | A description of the main impacts, risks and opportunities | 102-15 | 4.1 Business model and geographic presence 4.2 Purpose and values geared towards the challenges of the future 5.1 Our 2021-2023 Strategic ESG Plan | 12 - 18 19 - 23 25 - 28 |
| DESCRIPTION AND RESULTS OF GROUP POLICIES | Measures to address the main impacts, risks and opportunities. | Details of every section of this report are provided according to the corresponding topic. 102-15 | 6.2 Regulatory instruments | 43 - 45 |
| PRIMARY NON-FINANCIAL RISKS RELATED TO GROUP'S ACTIVITIES | A description of the main impacts, risks and opportunities of non-financial risks | Details of every section of this report are provided according to the corresponding topic, especially in section 102-15 | 6.3 Risk management and compliance | 46 - 54 |
| REPORTING DECLARATION | Declaration that the report has been produced in compliance with GRI Standards/Reference in report to national, European or international reporting framework used to select key indicators of non-financial results included in every section | 102-54 | 2. About this report | 6 |
| MANAGEMENT APPROACH | Explanation of material topic and coverage Management approach and its components Management approach assessment | 103-1 103-2 103-3 | 5.3 Materiality Analysis 6.2 Regulatory instruments 6.3 Risk management and compliance | 32 - 33 43 - 45 46 - 54 |

| CONTENT | DESCRIPTION | REFERENCE FRAMEWORK (GRI performance indicators or internal framework) | CHAPTER OF REPORT | PAGES / REASON FOR OMISSION |
|---|--|---|---|-------------------------------|
| ENVIRONMENTAL ISSUES | | | | |
| CURRENT AND PROJECTED EFFECTS OF THE COMPANY'S ACTIVITIES ON THE ENVIRONMENT AND, IF APPLICABLE, ON HEALTH AND SAFETY | Explanation of the current environmental impact of the company's activity. Violation of environmental law and regulations | Internal framework: Qualitative description of primary effects. 307-1 | 7.1 Climate action | 56 - 61 |
| ENVIRONMENTAL ASSESSMENT OR CERTIFICATION PROCEDURES | Assessment procedure: New suppliers that were screened and selected using environmental criteria | 308-1 Internal framework: Certified in accordance with ISO 45001, ISO 9001 and ISO 14001 (SOLARPACK S.A) | 9.3 Suppliers 1. A Word from our CEO 6.3 Risk management and Compliance | 110 a 113 3 - 5 46 - 54 |
| RESOURCES DEPLOYED TO PREVENT ENVIRONMENTAL RISKS | Human, financial and/or material resources deployed to the prevention of environmental risks (e.g. money spent on improving the lighting of facility X; staff/working hours dedicated to the development of an energy efficiency plan, etc.) | Internal framework: Qualitative description of resources deployed. | 7.1 Climate action | 56 - 61 |
| APPLICATION OF PRINCIPLE OF PRECAUTION | Precautionary principle or approach | 102-11 | 7.1 Climate action | 56 - 61 |
| QUANTITY OF PROVISIONS AND GUARANTEES FOR ENVIRONMENTAL RISKS | Following financial year's projected deployment of human, financial (provisions) and/or material resources for the prevention of environmental risks. | Internal framework: Qualitative description of provisions and guarantees. | 7.1 Climate action | 56 - 61 |
| POLLUTION | | | | |
| MEASURES TO PREVENT, REDUCE OR OFFSET CARBON EMISSIONS WHICH SERIOUSLY AFFECT THE ENVIRONMENT | Explanation of the measures introduced to prevent, reduce or redress emissions | Internal framework: Qualitative description of the primary measures and action plans. | 7.1 Climate action | 56 - 61 |
| PARTICULAR ATMOSPHERIC POLLUTION OF AN ACTIVITY, INCLUDING NOISE AND LIGHT POLLUTION. | Explanation of the measures introduced to prevent, reduce or redress emissions | Internal framework: Qualitative description of the primary measures and action plans | 7.1 Climate action | 56 - 61 |



| CONTENT | DESCRIPTION | REFERENCE FRAMEWORK (GRI performance indicators or internal framework) | CHAPTER OF REPORT | PAGES / REASON FOR OMISSION |
|--|--|--|---|--|
| CIRCULAR ECONOMY AND PREVENT AND WASTE MANAGEMENT | | | | |
| MEASURES OF PREVENTION, RECYCLING, REUSE AND OTHER FORMS OF RECOVERY | Measures (including circularity measures) introduced to prevent waste being generated during the activities of the organisation and routine activities at every stage of the value chain, and to manage the significant impact of waste. | 306-2 | 7.2 Circular economy and waste management | 62 - 64 |
| INITIATIVES TO TACKLE FOOD WASTE | Initiatives to tackle food waste | N/A | | No material in view of the Company's sector of activity |
| SUSTAINABLE USE OF RESOURCES | | | | |
| WATER CONSUMED AND SUPPLIED IN ACCORDANCE WITH LOCAL RESTRICTIONS | Water consumption: Water withdrawal by source Recycled water | 303-1 303-3 | 7.1 Climate action | 56 - 61 No material in view of the Company's sector of activity |
| CONSUMPTION OF RAW MATERIALS | Materials used by weight or volume | 301-1 | 7.1 Climate action | 56 - 61 |
| MEASURES ADOPTED TO IMPROVE EFFICIENCY IN THE USE OF RAW MATERIALS | The weight or total volume of materials used to produce and package the main products and services of the organisation in the period to which the report relates, by: i. non-renewable materials used; ii. renewable materials used. | 301-1 | 7.1 Climate action | 56 - 61 |
| DIRECT AND INDIRECT CONSUMPTION OF ENERGY | Energy consumption within the organisation | 302-1 | 7.1 Climate action | 56 - 61 |
| MEASURES TAKEN TO IMPROVE ENERGY EFFICIENCY | Reduction of energy consumption | 302-4 | 7.1 Climate action | 56 - 61 |
| USE OF RENEWABLE ENERGIES | Energy consumption within the organisation | 302-1 | 7.1 Climate action | 60 |

| CONTENT | DESCRIPTION | REFERENCE FRAMEWORK (GRI performance indicators or internal framework) | CHAPTER OF REPORT | PAGES / REASON FOR OMISSION |
|--|---|---|--------------------------------|---|
| CLIMATE CHANGE | | | | |
| IMPORTANT INFORMATION ABOUT GREENHOUSE GASES EMITTED AS A RESULT OF THE COMPANY'S ACTIVITIES | Direct (Scope 1) GHG emissions Energy indirect (Scope 2) GHG emissions Other indirect (Scope 3) GHG emissions. | 305-1, 305-2, 305-3 | 7.1 Climate action | 56 - 61 |
| MEASURES ADOPTED TO ADAPT TO THE CONSEQUENCES OF CLIMATE CHANGE | Financial implications and other risks and opportunities due to climate change | 201-2 Internal framework: Qualitative description of the primary measures | 7.1 Climate action | 56 - 61 |
| MEDIUM AND LONG-TERM REDUCTION GOALS VOLUNTARILY ESTABLISHED TO REDUCE GREENHOUSE GAS EMISSIONS AND THE RESOURCES USED TO THIS END | Reduction targets, GHG reduction plans | 305-5 | 7.1 Climate action | While SOLARPACK does not have any reduction targets, it is actively working on initiatives to establish these targets |
| PROTECTION OF BIODIVERSITY | | | | |
| MEASURES TAKEN TO PRESERVE OR RESTORE BIODIVERSITY | Associations have been set up with third parties to protect or restore habitats other than those supervised by the organisation and for which restoration or protective measures have been introduced | Internal framework: Qualitative description of the primary measures | 7.3 Protection of biodiversity | 65 - 70 |
| IMPACTS OF BUSINESS ACTIVITIES OR OPERATIONS ON PROTECTED AREAS | Significant impacts of activities, products, and services | 304-2 Internal framework: Qualitative description of primary impacts | 7.3 Protection of biodiversity | 65 - 70 |



| CONTENT | DESCRIPTION | REFERENCE FRAMEWORK (GRI performance indicators or internal framework) | CHAPTER OF REPORT | PAGES / REASON FOR OMISSION |
|--|--|--|---------------------------------|-----------------------------|
| SOCIAL ISSUES | | | | |
| EMPLOYMENT | | | | |
| TOTAL NUMBER AND BREAKDOWN ACCORDING TO SEX, AGE, COUNTRY AND PROFESSIONAL CLASSIFICATION | Total number of employees by employment contract (open-ended or temporary) and by sex. Total number of employees by employment contract (open-ended or fixed-term) and by region. | 102-8, 405-1 | 8.2 Human resources to the fore | 77 to 85 |
| TOTAL NUMBER AND BREAKDOWN ACCORDING TO FORM OF EMPLOYMENT CONTRACT | Total number of employees by employment contract (full or part time) and by sex, | 102-8 | 8.2 Human resources to the fore | 77 to 85 |
| ANNUAL AVERAGE OF OPEN-ENDED CONTRACTS, FIXED-TERM CONTRACTS AND PART-TIME CONTRACTS BY SEX, AGE AND PROFESSIONAL CLASSIFICATION | Annual average of open-ended contracts, temporary contracts and part-time contracts by sex, age and professional classification | 102-8, 405-1 | 8.2 Human resources to the fore | 77 to 85 |
| NUMBER OF DISMISSALS BY SEX, AGE AND PROFESSIONAL CLASSIFICATION | Number of dismissals by sex, age and professional classification | Internal framework: Total number of dismissals during the reporting period according to sex, age and professional category | 8.2 Human resources to the fore | 77 to 85 |
| AVERAGE REMUNERATION AND PROGRESSION ACCORDING TO SEX, AGE AND PROFESSIONAL CLASSIFICATION OR EQUAL VALUE | Average remuneration and progression according to sex, age and professional classification or equal value | Internal framework: Average remuneration (including fixed and performance-based pay) | 8.2 Human resources to the fore | 77 to 85 |
| WAGE GAP | Base wage and remuneration ratio of men to women | 405-2 | 8.2 Human resources to the fore | 77 to 85 |
| AVERAGE REMUNERATION OF DIRECTORS AND EXECUTIVES | Base wage and remuneration ratio of men to women | 102-38; 102-39; 405-2; 201-3 | 8.2 Human resources to the fore | 77 to 85 |
| DISCONNECTION POLICIES | Disconnection policies | Internal framework: Qualitative description of available policies | 8.2 Human resources to the fore | 77 to 85 |
| EMPLOYEES WITH DISABILITIES | Diversity of governance bodies and employees | 405-1 | 8.2 Human resources to the fore | 77 to 85 |

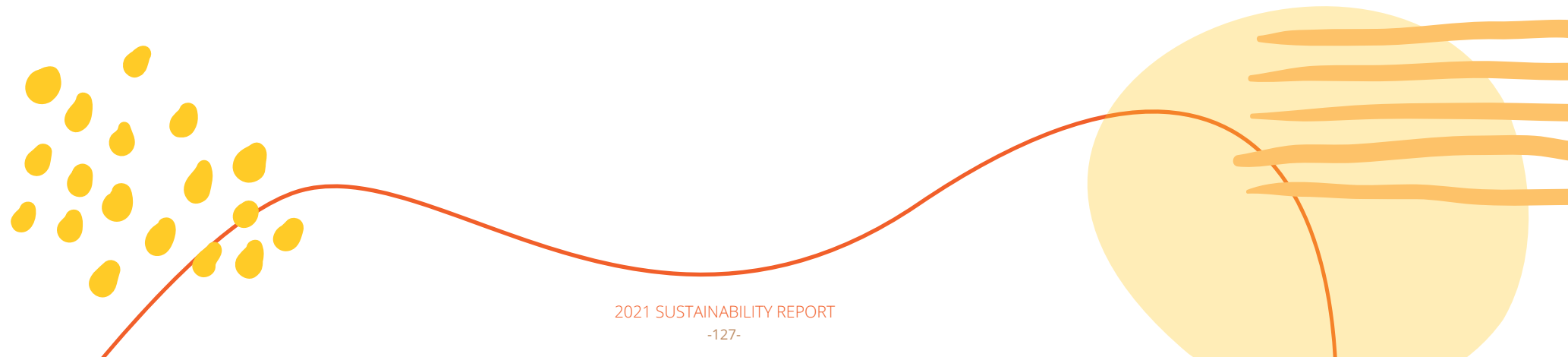
| CONTENT | DESCRIPTION | REFERENCE FRAMEWORK (GRI performance indicators or internal framework) | CHAPTER OF REPORT | PAGES / REASON FOR OMISSION |
|--|--|--|---------------------------------|-----------------------------|
| SOCIAL ISSUES | | | | |
| WORK ORGANISATION | | | | |
| WORK ORGANISATION | Explanation of the way in which the company organises work time: number of annual working hours in relation to the hours established in the collective agreement; how the weekly working hours are distributed, etc. | 102-8 | 8.2 Human resources to the fore | 77 to 85 |
| NUMBER OF ABSENTEEISM HOURS | Number of absenteeism hours | 403-2 | 8.2 Human resources to the fore | 77 to 85 |
| MEASURES TO HELP EMPLOYEES STRIKE THE RIGHT WORK-LIFE BALANCE | Measures designed to help employees strike the right work-life balance and to promote the exercise of shared custody rights by both parents | 401-2; 401-3 | 8.2 Human resources to the fore | 77 to 85 |
| HEALTH AND SAFETY | | | | |
| OCCUPATIONAL HEALTH AND SAFETY CONDITIONS | Measures designed to promote health and safety in the workplace | 102-8, 405-1 | 8.1 Health and safety | 73 to 76 |
| WORKPLACE ACCIDENTS, ESPECIALLY FREQUENCY AND SEVERITY, ACCORDING TO SEX | Number of accidents resulting in absence from work during working hours, for every million hours worked Severity rate | 403-2 403-2 | 8.1 Health and safety | 73 to 76 |
| OCCUPATIONAL DISEASES ACCORDING TO SEX | Diseases caused by occupational activity | 403-2 | 8.1 Health and safety | 73 to 76 |

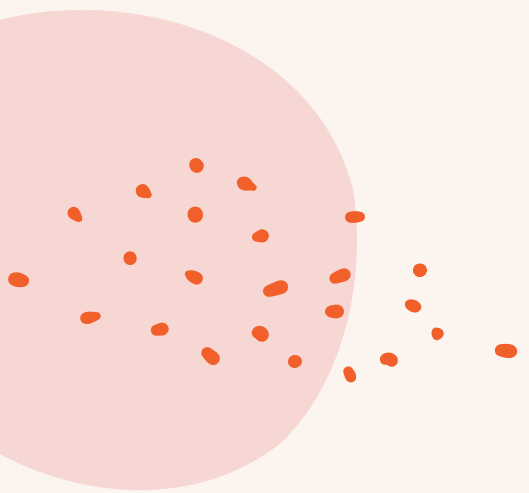
| CONTENT | DESCRIPTION | REFERENCE FRAMEWORK (GRI performance indicators or internal framework) | CHAPTER OF REPORT | PAGES / REASON FOR OMISSION |
|---|---|--|--------------------------------------|---|
| SOCIAL ISSUES | | | | |
| SOCIAL RELATIONS | | | | |
| ORGANISATION OF SOCIAL DIALOGUE, INCLUDING STAFF REPORTING, ADVISORY AND BARGAINING PROCEDURES | Representation of employees in formal employee-employer health and safety committees | 403-1 | 8.1 Health and safety | 73 to 76 |
| PERCENTAGE OF EMPLOYEES COVERED BY A COLLECTIVE BARGAINING AGREEMENT ACCORDING TO COUNTRY | Collective bargaining agreements | 102-41 | 8.2 Human resources to the fore | 77 to 85 |
| ASSESSMENT OF IMPACT OF COLLECTIVE AGREEMENTS ON OCCUPATIONAL HEALTH AND SAFETY | Explanation of whether formal agreements (local or global) with unions address health and safety issues. If so, to what extent, expressed as a percentage, do these agreements address particular health and safety issues? | 403-4 | 8.1 Health and safety | 73 to 76 SOLARPACK'S employees are protected by the relevant sectoral collective bargaining agreements which include the minimum health and safety information required by law |
| TRAINING | | | | |
| TRAINING POLICIES IMPLEMENTED | Programmes introduced to improve the skills of employees | 404-2 | 8.3 Attracting and developing talent | 86 to 88 |
| TOTAL AMOUNT OF TRAINING HOURS ACCORDING TO PROFESSIONAL CATEGORY | Annual average training hours per employee | 404-1 | 8.3 Attracting and developing talent | 86 to 88 |
| UNIVERSAL ACCESSIBILITY | | | | |
| UNIVERSAL ACCESSIBILITY OF PEOPLE WITH DISABILITIES | Concrete measures taken to make the company's facilities accessible to every individual. | 405-1 | 8.2 Human resources to the fore | 77 to 85 |
| EQUALITY | | | | |
| EQUALITY PLANS MEASURES ADOPTED TO PROMOTE EMPLOYMENT, SEXUAL AND GENDER-BASED HARASSMENT PROTOCOLS | Equal treatment measures such as: right to parental leave for employees, diversity in management bodies and employees. | 401-3; 405-1; 405-2 | 8.1 Health and safety | 73 to 76 |
| INTEGRATION AND UNIVERSAL ACCESSIBILITY OF PEOPLE WITH DISABILITIES | Policies designed to integrate disabled workers into the organisation | 405-1 | 8.1 Health and safety | 73 to 76 |
| POLICY AGAINST ALL FORMS OF DISCRIMINATION AND, IF APPLICABLE, DIVERSITY MANAGEMENT | Policies designed to guarantee a diverse workforce | 406 | 8.1 Health and safety | 73 to 76 |

| CONTENT | DESCRIPTION | REFERENCE FRAMEWORK (GRI performance indicators or internal framework) | CHAPTER OF REPORT | PAGES / REASON FOR OMISSION |
|--|---|--|---|-----------------------------|
| SOCIAL ISSUES | | | | |
| HUMAN RIGHTS | | | | |
| DUE DILIGENCE PROCEDURES IN THE FIELD OF HUMAN RIGHTS | Number of operations subject to human rights reviews, safety staff and employees who have received human rights training and agreements or contracts with human rights clauses | 102-16 | 4.2 Purpose and values geared towards the challenges of the future 9. Managing a sustainable value chain | 19 - 23 108 - 109 |
| PREVENTION OF HUMAN RIGHTS VIOLATIONS AND, IF APPLICABLE, MEASURES TO MITIGATE, MANAGE AND COMPENSATE ANY INCIDENTS OF ABUSE | Measures to prevent human rights violations and to manage any cases should they ever arise. | Internal framework: Qualitative description of available measures | 9.2 Respect for Human Rights | 108 to 109 |
| REPORTS OF HUMAN RIGHTS VIOLATIONS | Number of reports | 407-1 | 9.2 Respect for Human Rights | 108 to 109 |
| PROMOTION OF AND COMPLIANCE WITH COVENANTS ON THE FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING, DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION, ELIMINATION OF FORCED OR COMPULSORY LABOUR AND THE EFFECTIVE ABOLITION OF CHILD LABOUR | Respect for freedom of association and collective bargaining rights | 407-1 | 9.2 Respect for Human Rights | 108 to 109 |
| TACKLING DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION | Explanation of measures (plans, policies, etc.) introduced to manage this aspect | Internal framework: Description of measures | 9.2 Respect for Human Rights | 108 to 109 |
| ELIMINATION OF FORCED AND COMPULSORY LABOUR | Explanation of measures (plans, policies, etc.) introduced to manage this aspect | Internal framework: Description of measures | 9.2 Respect for Human Rights | 108 to 109 |
| EFFECTIVE ABOLITION OF CHILD LABOUR | Explanation of measures (plans, policies, etc.) introduced to manage this aspect | Internal framework: Description of measures | 9.2 Respect for Human Rights | 108 to 109 |
| CORRUPTION AND BRIBERY | | | | |
| MEASURES ADOPTED TO PREVENT CORRUPTION AND BRIBERY | Rules of conduct, anti-corruption policies and other measures to counter corruption and bribery, as well as mechanisms regulating unacceptable conduct at work or in dealings with communities and the wider society. | 102-16; 102-17; 205-1 | 6.3 Risk management and compliance | 46 to 54 |
| ANTI-MONEY LAUNDERING MEASURES | Besides anti-money laundering measures, explanation relating to executives and employees who have been informed of or trained in anti-corruption procedures | 205-2 | 6.3 Risk management and compliance | 46 to 54 |
| CONTRIBUTIONS TO NON-PROFIT FOUNDATIONS AND ENTITIES | List of financial contributions in euros | 201-1 | 9.1 Social action | 46 to 54 |

| CONTENT | DESCRIPTION | REFERENCE FRAMEWORK (GRI performance indicators or internal framework) | CHAPTER OF REPORT | PAGES / REASON FOR OMISSION |
|---|--|--|----------------------------|-----------------------------|
| SOCIETY | | | | |
| COMPANY COMMITMENTS TO SUSTAINABLE DEVELOPMENT | | | | |
| IMPACT OF COMPANY'S ACTIVITY ON EMPLOYMENT AND LOCAL DEVELOPMENT | Explanation about the way in which investments in infrastructure and services have developed over time, detailing the significant impact made on local communities | 413-1; 203-1; 203-2 | 9.1 Social action | 95 - 107 |
| IMPACT OF COMPANY'S ACTIVITY ON LOCAL PEOPLE AND COMMUNITIES | Violations of the human rights of indigenous populations and operations with significant negative impacts on local communities | 411-1; 413-2 | 9.1 Social action | 95 - 107 |
| RELATIONS WITH STAKEHOLDERS OF LOCAL COMMUNITIES AND EXISTING FORMS OF DIALOGUE | Operations with programmes whereby local communities are invited to contribute to the environmental and social impact assessment; development programmes and complaint processes for local communities | 102-43; 413-1 | 9.1 Social action | 95 - 107 |
| ASSOCIATION AND SPONSORSHIP INITIATIVES | List of association affiliations | 203-1; 102-12, 102-13 | 9.1 Social action | 95 - 107 |
| SUBCONTRACTORS AND SUPPLIES | | | | |
| INCLUSION OF SOCIAL, GENDER EQUALITY AND ENVIRONMENTAL ISSUES IN THE PROCUREMENT POLICY | Policies introduced to determine whether suppliers fulfil environmental and social criteria | 308-1 | 8.4 Equality and diversity | 89 to 93 |
| CONSIDERATION OF SOCIAL AND ENVIRONMENTAL RESPONSIBILITY IN RELATIONS WITH SUPPLIERS AND SUBCONTRACTORS | Suppliers assessed in accordance with environmental and social criteria during contracting process | 308-2 | 9.3 Suppliers | 110 - 113 |
| OVERSIGHT AND AUDITING SYSTEMS AND THEIR RESULTS | Measures taken to counter adverse effects on the supply chain. Audits of supplier operations carried out | Internal framework: Measures introduced | 9.3 Suppliers | 110 - 113 |

| CONTENT | DESCRIPTION | REFERENCE FRAMEWORK (GRI performance indicators or internal framework) | CHAPTER OF REPORT | PAGES / REASON FOR OMISSION |
|--|--|---|--|------------------------------|
| SOCIETY | | | | |
| CONSUMERS | | | | |
| CONSUMER HEALTH AND SAFETY MEASURES | Products/services to be assessed in respect of their impact on health and safety and the content of the corresponding measures | 416-1; 417-1 | 9.4 Customers | 114 - 115 |
| GRIEVANCE AND COMPLAINT SYSTEMS AND THEIR RESOLUTION | Total cases of violations of regulations on health and safety impacts and product/service safety | 416-2; 418-1 | 9.4 Customers | 114 - 115 |
| TAX REPORTING | | | | |
| PROFIT MADE ACCORDING TO COUNTRY | Pre-corporation tax profit/(loss) according to country | 201-1 | 3. 2021 in figures 6.2 Regulatory instruments 6.3 Risk management and compliance | 8 - 10 43 - 45 46 - 54 |
| TAX ON PROFIT PAID | Corporation tax paid according to country | Internal framework: Tax paid on profit | 3. 2021 in figures 6.2 Regulatory instruments 6.3 Risk management and compliance | 8 - 10 43 - 45 46 - 54 |
| PUBLIC GRANTS RECEIVED | Public grants received according to country | 201-4 | 3. 2021 in figures 6.2 Regulatory instruments 6.3 Risk management and compliance | 8 - 10 43 - 45 46 - 54 |





11.

Annex II:
**Independent
verification
report**



Solarpack Corporación Tecnológica, S.A. (Sole-Shareholder Company) and Subsidiaries

Independent Verification Report of the Consolidated Statement of Non-Financial Information for the year ended 31 December 2021

Translation of a report originally issued in Spanish. In the event of a discrepancy, the Spanish-language version prevails.

Deloitte.

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Translation of a report originally issued in Spanish. In the event of a discrepancy, the Spanish-language version prevails.

INDEPENDENT LIMITED ASSURANCE REPORT

To the Sole Shareholder of Solarpack Corporación Tecnológica, S.A. (Sole-Shareholder Company),

In accordance with Article 49 of the Spanish Commercial Code, we have performed the verification, with a scope of limited assurance, of the accompanying Sustainability Report ("the Report") for the year ended 31 December 2021 of Solarpack Corporación Tecnológica, S.A. (Sole-Shareholder Company) and subsidiaries ("Solarpack" or "the Group"), which forms part of the Group's Consolidated Directors' Report.

The content of the Sustainability Report includes information, additional to that required by current Spanish corporate legislation relating to non-financial reporting and by the Global Reporting Initiative Standards for sustainability reporting in their core version ("GRI standards"), that was not the subject matter of our attestation engagement. In this regard, our work was limited solely to verification of the information identified in the "Appendix I: List of Indicators - GRI" table included in the Report.

Responsibilities of the Directors

The preparation and content of the Group's Report are the responsibility of the Directors of Solarpack Corporación Tecnológica, S.A.U. The Report was prepared in accordance with the content specified in current Spanish corporate legislation and with the criteria of the selected Global Reporting Initiative Sustainability Reporting Standards in their core version (GRI standards), as well as other criteria described as indicated for each matter in the "Appendix I: List of Indicators - GRI" table in the aforementioned Report.

These responsibilities also include the design, implementation and maintenance of such internal control as is determined to be necessary to enable the Report to be free from material misstatement, whether due to fraud or error.

The directors of Solarpack Corporación Tecnológica, S.A.U. are also responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the Report is obtained.

Our Independence and Quality Control

We have complied with the independence and other ethical requirements of the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code), which is based on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Control 1 (ISQC 1) and, accordingly, maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our engagement team consisted of professionals who are experts in reviews of non-financial information and, specifically, in information about economic, social and environmental performance.

Our Responsibility

Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed, which refers exclusively to 2021. The information relating to previous years was not subject to the verification provided for in current Spanish corporate legislation.

We conducted our work in accordance with the requirements established in International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements other than Audits or Reviews of Historical Financial Information ("ISAE 3000 Revised"), currently in force, issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the guidelines published by the Spanish Institute of Certified Public Accountants on attestation engagements regarding non-financial information statements.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and, consequently, the level of assurance provided is also substantially lower.

Our work consisted of making inquiries of management and the various units of Solarpack that participated in the preparation of the Report, reviewing the processes used to compile and validate the information presented in the Report, and carrying out the following analytical procedures and sample-based review tests:

- Meetings held with Group personnel to ascertain the business model, policies and management approaches applied, and the main risks relating to these matters, and to obtain the information required for the external review.
- Analysis of the scope, relevance and completeness of the contents included in the 2021 Report based on the materiality analysis performed by the Group and described in section "5.3 Materiality Analysis", taking into account the contents required under current Spanish corporate legislation.
- Analysis of the processes used to compile and validate the data presented in the 2021 Report.

- Review of the information relating to risks and the policies and management approaches applied in relation to the material matters presented in the 2021 Report.
- Verification, by means of sample-based tests, of the information relating to the contents included in the 2021 Report and the appropriate compilation thereof based on the data furnished by information sources.
- Obtainment of a representation letter from the directors and management.

Conclusion

Based on the procedures performed in our verification and the evidence obtained, nothing has come to our attention that causes us to believe that the Report of the Group for the year ended 31 December 2021 was not prepared, in all material respects, in accordance with the content specified in current Spanish corporate legislation and in keeping with the criteria of the GRI standards in their core version, as well as other criteria described as indicated for each matter in the "Appendix I: List of Indicators - GRI" table of the aforementioned Report.

Use and Distribution

This report has been prepared in response to the requirement established in corporate legislation in force in Spain and, therefore, it might not be appropriate for other purposes or jurisdictions.

DELOITTE, S.L.



15 March 2022