

# Social investment policy

## Introduction

---

The Board of Directors of ZELESTRA CORPORACIÓN, S.A.U. (hereinafter "Zelestra" or the "Company" and the group of companies of which Zelestra is the parent company, the "Zelestra Group"), has approved the Social Investment Policy (hereinafter, "the Policy"), which is integrated into its Corporate Governance Regulations. This Policy is aligned with the provisions contained in Zelestra's General Sustainability Policy and Stakeholders Engagement Policy.

## General Objectives of the policy

---

The Policy is dedicated to establishing global principles and framework for Zelestra to make a meaningful, positive impact on the communities where the company operates. Its commitment to social contribution extends beyond legal obligations, emphasizing sustainable impact over mere compliance. Driven by its purpose, Zelestra aims to advance social investment initiatives that foster resilient communities, supporting both local development and global environmental goals.

By embedding these initiatives within its business activities, Zelestra strives to promote economic and social growth in the communities where the company operates. By leveraging its long-standing expertise, resources, and commitment, the Company works to create lasting value and drive sustainable growth, leaving a positive legacy for the environment and society.

## Scope

---

This Policy is applicable to all the companies in the Zelestra Group, within the legally established limits.

Where appropriate, the application of this Policy may be extended to any other natural and/or legal person that has a relationship with Zelestra other than an employment relationship.

## Strategic axes and objectives

---

Zelestra's social investment focus on community long-term empowerment and sustainable development. The Company mainly channels its social investment through Zelestra's 3 Es: Education, Energy and Environment.

Furthermore, this approach may also encompass different programs or initiatives built in collaboration with local communities, related to microfinance or capacity building that support local entrepreneurs and job creation, productive development, provision of equipment and basic infrastructure services, environmental sustainability, ecological balance and biodiversity related initiatives or promotion of local art and culture and protection of cultural heritage.

In addition, Zelestra embeds DEI (Diversity, Equity and Inclusion) and Innovation as cross-cutting elements in its social investment strategy, ensuring that all its initiatives respect the inclusion of different social groups and adopt creative and adaptive solutions to maximize their impact. This approach seeks to ensure that initiatives are accessible, equitable and sustainable, paying special attention to vulnerable populations and promoting an inclusive, innovative and transformational environment in all its activities.

While humanitarian aid is not the primary focus of Zelestra's social investment strategy, the company acknowledges the importance of responding to exceptional circumstances that require short-term, immediate relief. Therefore, in cases such as natural disasters Zelestra might consider implementing humanitarian aid initiatives aimed at addressing urgent needs and alleviating suffering within the affected communities where the company operates.

## Commitments

---

Zelestra aligns its social initiatives with its corporate purpose and core beliefs, viewing this approach as essential for making a lasting contribution to societal well-being. To achieve its goals in this area, the Zelestra Group has made the following commitments:

- **Stakeholder Engagement:** Zelestra actively collaborates with stakeholders, integrating their feedback into decisions to meet the unique needs of each community it serves. Social investment initiatives are designed, implemented and communicated in close partnership with local communities to ensure alignment with local demands and priorities.
- **Promotion and Awareness of Sustainable Development:** Zelestra prioritizes raising awareness and fostering sustainable practices, particularly among employees. Corporate volunteering is a cornerstone of its social investment strategy, building a culture of collaboration and enabling employees to contribute meaningfully to social causes.
- **Partnerships with local entities:** Zelestra supports projects of a social nature through collaborations with local organizations, local NGOs and other nonprofit institutions, expanding the impact of its social programs. While we do not intend to replace the state or its authorities at any local, regional, or national level, we are open to reaching agreements with them to leverage our management capabilities to enhance their social programs that align with our principles.
- **Continuous Improvement in Social Investment Programs:** The Company is committed to continuous enhancement of its social programs, defining clear plans, objectives, and long-term goals. Zelestra applies internationally recognized corporate methodologies to evaluate the social and business benefits of each initiative. Stakeholders are encouraged to engage in this process, ensuring that programs are refined and deliver effective outcomes.
- **Measuring Impact:** Zelestra is dedicated to assessing the effectiveness of its social investment initiatives. By employing robust evaluation frameworks and methodologies, the Company measures the social and environmental impacts of its programs to ensure they are achieving the desired outcomes and generating meaningful benefits for communities.
- **Ethics and Transparency:** Maintaining the highest standards of ethical integrity and transparency is fundamental to Zelestra's approach. The Company ensures resources are allocated responsibly, in alignment with its Code of Ethics and Conduct, and its Fraud and Corruption Prevention Policy, social objectives, and conducts thorough due diligence to avoid any misuse or regulatory conflicts.

The Company's aim is not to restrict itself to the commitments outlined above. These commitments might be refined and expanded to incorporate new areas of focus that respond to evolving social and environmental needs.

## Mechanisms of social investment

---

Zelestra implements the defined objectives and commitments through the following mechanisms:

- **Community Development Programs/Initiatives:** design Zelestra's own programs or join forces with other entities' increasing the social, economic and environmental welfare and wealth of the areas where Zelestra's projects are located.
- **Employee Volunteering:** Encourage employees to volunteer in the communities where the company operates, allowing them to have a meaningful and direct impact dedicating their time and skills to community service initiatives.
- **Matching Donations and Grant Programs:** Establish a matching donations program where the company matches employee contributions to social causes or create grant programs for local organizations that align with the company's social impact priorities.
- **Sustainable Supplier Development Initiatives:** Partner with local suppliers to enhance their capabilities, support fair labor practices, and promote sustainability, thereby improving social and economic outcomes within the supply chain.
- **Partnerships with Nonprofit and Public Sector Organizations:** Collaborate with NGOs, government agencies, and other institutions to leverage resources, enhance credibility, and expand the reach and impact of social programs.
- **Sponsorship Programs:** Engage in sponsorship of local events, cultural programs, and community projects that align with the company's values and enhance its visibility and engagement within the community.
- **Corporate Philanthropy and Charitable Donations:** Allocate funds for direct donations to trusted charities and philanthropic causes that align with corporate values.

## Communication and Stakeholders engagement

---

This Policy is communicated and understood within the scope of the organization, and it is available through the information and communication channels that the Company makes available to all its stakeholders.

This Policy is publicly available on the Zelestra website.

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