

Business continuity policy

Objective

The objective of this policy is to reflect the engagement of Zelestra Group's management to establish a Business Continuity Management System.

Zelestra fully recognizes the availability requirements of its operations and, consequently, of resources related to information and communications technologies (ICT) and operating assets (OT). These, together with third-party supplies, are essential to achieve the company's business objectives.

Aware of this and in order to maintain the availability of services, Zelestra's Management is committed to establish a Business Continuity Management System. This BCMS will apply the best international practices, with respect to the current legislative and regulations on the matter, and in an integrated manner with Information Security.

The Senior Leadership Team of Zelestra has the power to design, assess and continuously revise the corporate policies, which contain the guidelines governing the conduct of Zelestra and of the companies belonging to the group.

In fulfilling these responsibilities, in order to lay down the general principles that are to govern all aspects of business continuity and in, the Senior Leader Team hereby approves this Operational Business Continuity Policy (the "Policy").

Basic principles

This Policy establishes the following guidelines within Zelestra's business continuity framework, which will structure the principles of its Business Continuity Management System (BCMS):

- Protection and safety of personnel both in a disaster scenario and in a normal situation.
- Management's responsibility for managing risks relevant to the continuity of the company's operations.
- Review of the business continuity procedures that are developed in Zelestra. These must be implemented properly, with attention to all areas, critical operations and suppliers.
- Management's commitment to ensure that the BCMS will be implemented and updated on a regular basis. It will be reviewed, tested and improved periodically or as a result of relevant changes both in the company and in external factors that may affect Zelestra.
- It will be established the composition of a trained Crisis Committee with the skills required to act in the event of a disaster.
- The development of training plans will be encouraged with the purpose of ensuring that personnel acquire the necessary knowledge to maintain the BCMS.
- It will be developed both internal and external communication plans, with applicability when there is a disaster situation that activates the Continuity Plan.
- The BCMS will aim to ensure that critical services are recovered within acceptable time frames.
- Zelestra will collaborate with authorities in case of need or disaster.

The Policy must be understood and assumed by all Zelestra personnel, as well as its collaborators, and must be available to the company's stakeholders.

Implementation

Based on the BCMS, Zelestra and its Group shall prepare business continuity plans, which shall include details of the tasks to be carried out in each financial year in order to effectively deploy, implement and execute the BCMS. For this purpose, the Digitalization & Cybersecurity function, shall coordinate the preparation of said business continuity plans with the corresponding corporate and business divisions and business units in each area, which undertake to integrate the continuity plans into their daily operations and to provide all the necessary collaboration and support to Digitalization and Cybersecurity.

Monitoring system

The companies of the Group shall adopt the mechanisms necessary to ensure compliance with applicable law in terms of business continuity, as well as the BCMS and the plans that are developed and specified, as part of proper business

management.

In this regard, Zelestra's Digitalization & Cybersecurity function (or such functions as assume the duties thereof at any time), shall monitor the definition, review and implementation of this Policy, the business continuity plans in the territories and for the specific businesses of the Group.

Additionally, the Zelestra's Digitalization & Cybersecurity function (or such function as assumes the duties thereof at any time) shall monitor the status of the BCMS and its global level of implementation.

Communication and stakeholder 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.

The Policy is publicly available on the Zelestra website.

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

Scope

This policy extends not only to internal staff, but also to all persons, entities, institutions or units, both internal and external, that make use of the company's resources.

Consequently, this policy considers a global scope of Zelestra and is applicable to all companies in the group, contemplating the ICT/OT assets that support it.

This Policy applies to all the companies of the Zelestra Group.

In those investees in which the companies of the Zelestra Group do not have effective control, Zelestra shall promote principles and guidelines consistent with those set forth in this Policy.