

2020

# Sustainability Policy



# TABLE OF CONTENTS

<b>1</b>	<b>Introduction</b>	<b>2</b>
<b>2</b>	<b>Goal</b>	<b>3</b>
<b>3</b>	<b>Scope of application</b>	<b>4</b>
3.1	General commitments	4
3.2	Sustainable economic growth	5
3.3	Good Governance	6
3.4	Environment	7
3.5	People	9
3.5.1	Employees	9
3.5.2	Suppliers	9
3.6	Communities	10
<b>4</b>	<b>Compliance procedures</b>	<b>11</b>
4.1	Execution and control	11
4.2	Communication	11
4.3	Approval	11
4.4	Revision	11

# 1. Introduction

## The importance of creating long-term value

Ecoener is a different energy company, with its own culture and a different way of being. Thus, from the beginning, Ecoener has had a clear and inescapable commitment to sustainability. The creation of long-term value, environmental conservation, respect for Human Rights and the commitment to the communities where it carries out its activity have been, among others, principles it has respected and has assumed as its own.

Ecoener believes in and recognizes the importance of sustainability. It has done this from the beginning and will continue doing this in each of its projects. Ecoener has the firm intention to stimulate sustainable development, to preserve the natural environment and to contribute to social development.

In this regard, it has undertaken to preserve the most valuable legacy we have as a society: nature. In its projects, it always ensures maintenance of social, economic and environmental balance. One of the main goals at Ecoener is to take care of the environment and to treat each location as what it is: something unique, a space that must be preserved.

The commitment to sustainability is also evident in the long-term view of each of its projects, and in the responsibility it has assumed to create value. Ecoener has always ensured, and will continue to ensure, maximum respect not only for the natural, but also the social environment, as it continues overseeing the protection of investments and of the people involved in carrying out its activity.

The Ecoener Sustainability Policy is based on the unique model for action that characterizes the company, a different energy company, that does things well and that prioritizes the creation of value for its interest groups with a long-term view. This is a commitment that transcends, and that in any case, goes beyond the optimization of short-term economic performance.

This Policy shows how the company has carried out its activity throughout its history and contains the vision and the main commitments that guide its action in the area of sustainability.

## 2. Goal

Sustainability is and always has been a strategic priority for Ecoener; thus, it has established the goal of ensuring that in each of its actions, the balance is respected between creation of profitability, social development and the reduction of environmental impact of its activity, ensuring the preservation of the legacy of nature and promoting the development of the communities where it operates.

The goal is and will be to do things well and to encourage the long-term creation of value, with special care and responding to the expectations of the main stakeholder groups of the company.

Considering the above statement, the goal of the Ecoener Sustainability Policy is:

- To develop ethical, responsible and transparent behaviour in its actions.
- To maximize the positive impact of the activity on the different territories where it carries out its projects.
- To minimize the possible negative environmental and social impacts to prevent damages to people, company assets and the environment.
- To responsibly manage the risks and opportunities of each of the projects.
- To develop relations of credibility and trust with the main stakeholder groups.
- To facilitate transparent communication with the stakeholder groups and especially with the local communities of the regions where it is present.
- To impel the achievement of the United Nations Sustainable Development Goals (SDGs).
- To ensure compliance with the 10 principles of the United Nations Global Pact.
- To respect and comply with the provisions of the Equator Principles.
- To provide information regarding the economic, social and environmental performance as recommended in the standards of the Global Reporting Initiative (GRI).

## 3. Scope of application

Sustainability is an integral part of the Ecoener business model

Ecoener understands sustainability, not as an isolated everyday activity, but instead as a transversal value that must be incorporated into each of the interventions and actions it carries out. It is because of this that Ecoener acknowledges that sustainability must be integrated cross-sectionally into all businesses and at all levels. Thus, the Sustainability Policy establishes the basic principles of conduct for management of sustainability and consolidates the commitment of the company in the economic, social, environmental and good governance areas.

The principles established in this Policy are applied to each of the projects, businesses and activities of the company, regardless of the place where they are carried out.

The Sustainability Policy ensures and facilitates the adoption of the best practices with regard to sustainability in the different projects and businesses undertaken by the company. It also makes it possible to have the mechanisms necessary to know and analyse the expectations of the main stakeholder groups.

The Sustainability Policy is structured in six blocks:

1. General commitments.
2. Sustainable economic growth.
3. Good Governance.
4. Environment.
5. People.
  - Employees.
  - Suppliers.
6. Communities.

### 3.1 GENERAL COMMITMENTS

Ecoener is a different energy company; thus, when it undertakes a project, it not only acts honestly and responsibly, but it ensures that the engineering work takes into account the environmental, the industrial and the social aspects.

Creating long-term value, acting ethically and responsibly, responding appropriately to the expectations of the main stakeholder groups, is one of the main objectives of the company. Therefore, Ecoener assumes the following general commitments with regard to sustainability. Commitments that must be considered in each of the projects and business dealings it undertakes:

- Maintaining the long-term creation of value as a premise and part of its business model.
- Adopting and impelling the best practices for sustainability management.
- Providing and having the necessary resources to progress in the implementation of sustainable actions, taking into account in each of its projects, the impact caused in the economic, social and environmental areas.
- Listening, learning and analysing the expectations of the main stakeholder groups.
- Developing relationships of trust with the stakeholder groups.
- Complying with the current legal requirements in the places where it is present, paying special attention to the places where it is present, paying special attention to matters such as: respect for human rights, environmental protection and the efficient use of natural resources.
- Taking care of nature and the natural surroundings of the places where it carries out the projects.
- Developing a culture of caring for the environment and respect for the dignity of people among the employees.
- Establishing its own objectives to contribute to the goals defined in the Sustainable Development Goals.
- Respecting the provisions in the Universal Declaration of Human Rights, the Declaration of the International Labour Organization, and in the international reference standards with regard to sustainability, good work practices, and corporate governance.
- Complying with the Principles of the Global Pact.
- Establishing and respecting the company guidelines for conduct, among them the provisions in the Human Rights Policy, the Code of Conduct and the Community Relations Policy.
- Continuing to develop and ensuring the generation of renewable energy.

## 3.2 SUSTAINABLE ECONOMIC GROWTH

In Ecoener, sustainability and the long-term view of projects are main way to protect the environment, investments and to ensure the sustainable growth of the company. This is and has always been its way of acting. It is because of this that in the economic area and with the objective of growing in a sustained manner, Ecoener is committed to:

### Investments and resources

- Ensuring sustained and sustainable economic performance.
- Protecting investments ensuring the creation of long-term profitability.
- Encouraging the responsible and efficient use and management of the company resources.

## Projects

- Making, developing and operating projects of investment responsibly and honestly.
- Placing value on knowledge, trajectory and experience in the execution of the projects.
- Continuing to develop innovation and the adoption of the best technologies for the implementation of projects, always ensuring the long-term growth of the company.

## Risk Management

- Ensuring and overseeing the appropriate management of financial and non-financial risks, at all company levels.
- Appropriately identifying the risks that could affect the proper implementation of the projects.

## Relations with partners and investors

- Establishing a balanced, transparent and clear relationship with partners and investors.
- Offering clear, complete and true information to the partners and investors.

## 3.3 GOOD GOVERNANCE

Ethics, integrity and responsibility: principles that are part of the business model

Ecoener promotes the best practices of Corporate Governance, ensuring compliance with the legislation and regulations of the countries where it operates, assuming the commitments in international protocols and standards as its own.

To ensure management that is responsible and in line with the highest standards of corporate governance, Ecoener is committed to:

### Ethics and transparency

Acting in an ethical and transparent manner in all business dealings and projects is the greatest commitment assumed by the company: this is its way of acting.

With regard to ethics and transparency, Ecoener also establishes the following commitments:

- To comply with the principles of conduct and commitments established in the Code of Conduct.

- To have mechanisms for receiving reports of possible breaches of the principles established in the Code of Conduct, guaranteeing the confidentiality of people and that there will be no retaliation against the whistle blower.
- To ensure transparency in information and communication with the main stakeholder groups.
- To manage efficiently and effectively the communication with the different media when so required.

## Regulatory and fiscal compliance

- To ensure compliance with the law in all the countries where it is present.
- To comply with the tax regulations applicable to the places where the projects are carried out.
- To identify, prevent and avoid assuming tax risks derived from poor interpretation of the fiscal requirements applicable to the countries where Ecoener is present.
- To supply sufficient financial and tax information, always complying with the provisions in tax regulations.

## Relation with third parties

- To be committed to building lasting alliances with suppliers and partners.
- To build transparent relationships with authorities, public administrations and institutions with whom there are relations, based on trust, respect and collaboration.
- To have the channels of communication necessary to inform, involve and maintain a continuous dialogue with the main stakeholder groups.

## 3.4 ENVIRONMENT

Ecoener ensures protection for the environment in each of its actions. It is committed to ensuring not only compliance with legislation with regard to environment, but it reiterates through the following commitments the intention to continue developing the adoption of the best practices and technologies for environmental protection.

Since its beginning, Ecoener has assumed and adopted as a priority in its projects the protection of the natural environment, caring for nature and having the resources necessary to cause the least impact possible with the performance of its activity. In this regard, the company is committed to progress in the responsible management of natural resources, to comply with and respect due diligence with regard to the environment, and to continue contributing through the development of projects of renewable energy.

## Management of natural resources

One of the main objectives of the company is to develop and implement the best practices of environmental protection and management to achieve more efficient management, that takes into consideration criteria such as the protection of biodiversity and of the ecosystems, preventing their deterioration. Therefore, Ecoener assumes the following commitments:

- To use natural resources responsibly and reasonably.
- To manage natural resources efficiently and respectfully.
- To prioritize being able to integrate the installations into nature, so that they can form a part of the communities and of their environment.
- To have resources to continue innovating and incorporating the best technologies available, technologies that are eco-friendly and do not compromise the quality of the projects.
- To treat each project site as what it is: something unique, a space that must be preserved.

## Due diligence

Ecoener ensures the process of due diligence with regard to the environment in each of the projects it carries out; thus, it is committed to:

- Performing appropriate management of environmental risks and opportunities.
- Identifying, knowing, preventing, mitigating, and compensating the environmental impacts created by the activity.

## Environmental compliance

- To comply with environmental legislation in each of the countries where the projects are carried out. This includes compliance with international declarations, conventions and treaties, as well as national, regional and local regulations.
- To encourage and extend the environmental commitment with the employees, suppliers and third parties with whom there is relation.

## Climate change

Ecoener is committed to the development of renewable energy projects. For this purpose, it is committed to:

- Recognizing and placing value on its contribution in the fight against climate change.
- Developing the energy efficiency of the projects.

## 3.5 PEOPLE

### 3.5.1 Employees

Ecoener recognizes and respects the dignity of people. Additionally, in each of the places where it carries out its activity, it is committed to developing the best work practices, to respecting Human Rights and to compliance with the provisions in the Human Rights Policy. For this purpose, Ecoener establishes the following commitments:

- To promote decent employment, offering stable, quality jobs.
- To promote professional development and growth, providing processes for training and professional development of its employees.
- To ensure the well-being of the employees, showing concern for their motivation and good performance in the job.
- To have the tools and requirements necessary to ensure the health and safety of all the employees.
- To ensure a decent and safe work environment.
- To ensure the right to exercise the freedom of association.
- To reject all forms of forced and child labour.
- To encourage dialogue and internal communication.
- To comply with the international standards referring to Human Rights and good work practices.
- To comply with the provisions in the Human Rights Policy.

### 3.5.2 Suppliers

- To promote compliance among the suppliers of the provisions in the Code of Conduct and other company policies with regard to Human Rights, work practices, ethics and environmental protection.
- To further the contracting of local suppliers in the regions where the projects are carried out.

## 3.6 COMMUNITIES

Although each project needs a specific design to safeguard the environment, it also needs a commitment to the territories and the people who live in them. Ecoener hopes to contribute to the development of the local communities and the territories where it carries out its activity.

Considering the above statement, the company makes the commitment to:

- Always consider the characteristics and needs of the regions where the projects are carried out.
- Encourage dialogue that is respectful, bidirectional and transparent with the main stakeholder groups, taking special care in relations with the local communities.
- Establish channels of communication and the mechanisms necessary to facilitate the building of solid relations with the stakeholder groups.
- Seek relations with the local communities based on trust and respect.
- Make and prioritize, to the extent possible, purchases from local suppliers and local contracting.
- Finance and support projects of interest for the local communities. Ecoener can make contributions and use financial resources through collaborations, sponsorships or similar, with the aim of developing projects that stimulate local development.
- Maintain an attitude that is respectful, collaborative and participative with the bodies and private and public institutions that are present in the territory.
- Comply with the provisions in the Community Relations and Human Rights Policies

## 4. Compliance procedures

### 4.1 Execution and control

All employees of Ecoener have the obligation to know, understand and comply with the provisions contained in this Policy, regardless of the country or region where they are located. In addition, they must report with regard to any possible related impact or noncompliance. Ecoener expects a great commitment by its employees for compliance with these provisions.

If an employee or an external person considers that there exists a situation contrary to the provisions in the Sustainability Policy, they can communicate this in the following manner:

- By email: [canaletica@ecoener.eu](mailto:canaletica@ecoener.eu)
- By post: Cantón Grande, nº 6, 6º. 15003 La Coruña. Spain.

Ecoener guarantees confidentiality in the matters discussed; in addition, it will act responsibly to protect the identity of the persons who submit consultations or report complaints and it will not tolerate retaliation of any type.

### 4.2 Communication

Ecoener encourages the knowledge of and compliance with the commitments established in this Policy, which will be available on the website permanently.

It also makes the commitment to communicate in a public and transparent manner the programs and actions carried out in the framework of compliance with this policy.

### 4.3 Approval

This Sustainability Policy was approved by Board of Directors, on 10 June 2020.

### 4.4 Revision

This Policy will be revised periodically to ensure its effective implementation, and if necessary, the pertinent adjustments can be made.

All revisions and adjustments must be approved by the Board of Directors and will be made known in the General Shareholders Meeting.

In the event of any significant change, Ecoener will communicate and make known the content of the new Policy to all its employees and other stakeholder groups.



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