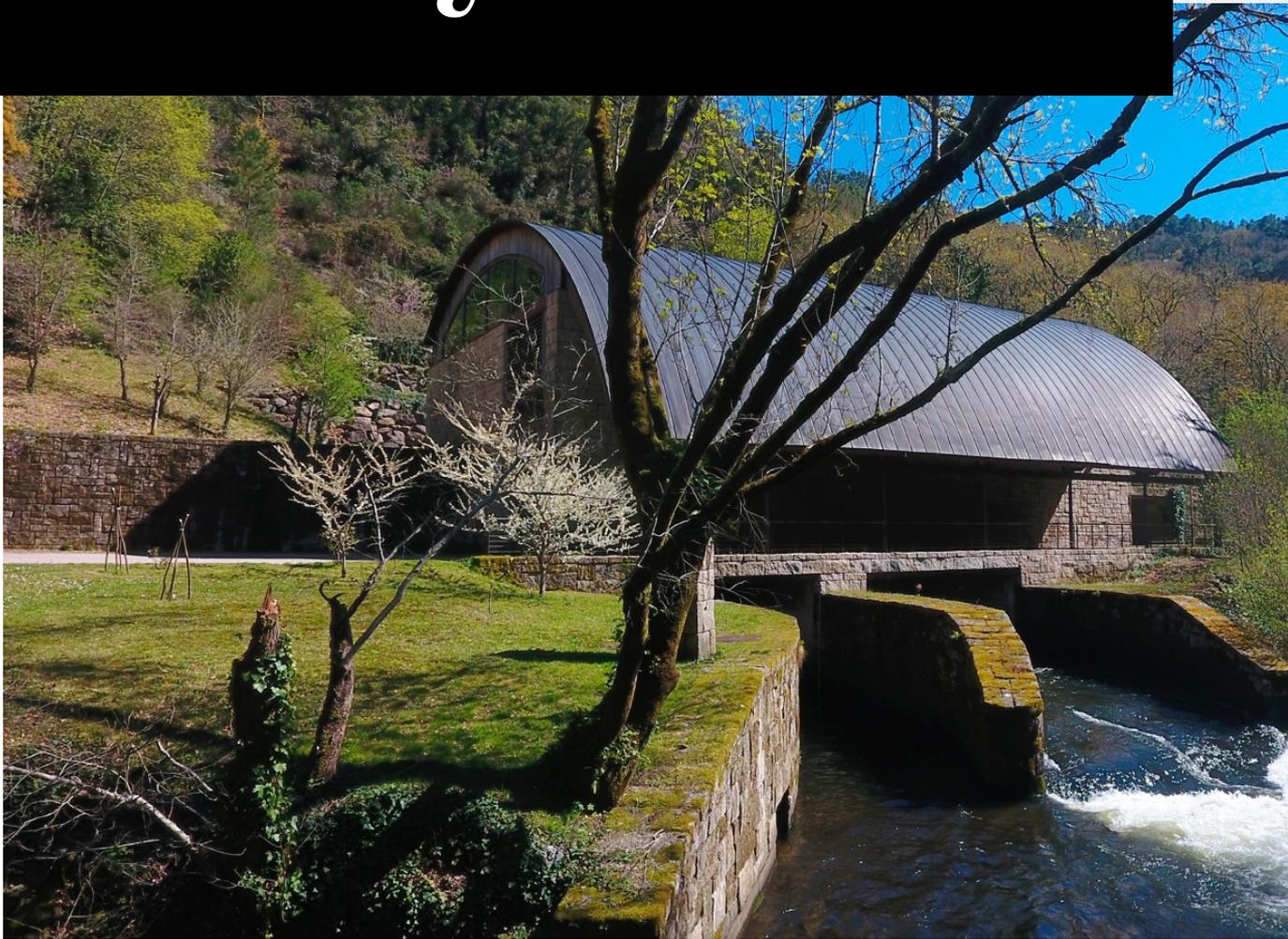


2020

# Community Relations Policy



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# 1. Introduction

A unique energy company

## 1.1 Justification

Ecoener has the aim of **impelling sustainable development** to preserve the natural environment and contribute to social development. This involves seeking the balance and maximum respect for the natural and social environment of the places where it carries out its projects.

Success is not measured only with numbers: the greatest success for Ecoener is the satisfaction of a job well done. This way of acting requires real commitment and respect for principles of integrity, responsibility and long-term vision. Moreover, it requires an excellent relationship with communities: **creating value in local communities must be a premise** in each of the projects.

Ecoener acknowledges that when it undertakes a project, the engineering work **must take into account both the natural and social aspects**. Only in this way can the installations blend into nature, **forming part of the community** and its surroundings. It is because of this, that just as each installation needs a specific design to safeguard the environment, it also needs a specific commitment to the communities.

Ecoener is a unique energy company, with its own culture and a unique way of being. Thus, this Community Relations Policy **establishes the commitments and the principles that will guide the actions** of the company when engaging with the communities that live in the regions where it carries out its activity.

## 1.2 Goal

The goal of the Community Relations Policy is to **facilitate value creation and establish solid relations of trust with the communities** that live in the territories where Ecoener is present.

Ecoener acknowledges that initiatives carried out at the local level can contribute to strengthening ties with the communities.

This Policy establishes the bases that will allow the strengthening of existing and future ties with the local communities.

## 2. Regulatory framework

### 2.1 International standards and references

Ecoener will act in accordance with **international reference standards** and voluntary initiatives, among which are included, but not limited to, the following:

- The United Nations Sustainable Development Goals (SDGs)
- The 10 Principles of the United Nations Global Pact.
- The United Nations Principles of Social Investment.
- The Guidelines of the Global Reporting Initiative (GRI)
- The Principles of Corporate Social Responsibility (ISO 26000)
- Conventions 107 and 169 of the International Labour Organization (ILO) on Indigenous and Tribal Peoples
- The Equator Principles.
- The Tripartite Declaration of Principles on Multinational Enterprises and Social Policy of the International Labour Organization (ILO).
- The Basic Principles and Guidelines of United Nations on Evictions and Displacement induced by Development.
- Other pertinent standards.

### 2.2 Internal References

The Community Relations Policy must be interpreted jointly with the following internal policies:

- Code of Conduct.
- Human Rights Policy.
- Sustainability Policy.

### 3. General Commitments

**Social involvement** with the territories forms part of the business activity of Ecoener.

With the aim of contributing to the development of the social environment of the places where it operates, respecting the identity, the customs and the culture of the people, and maintaining an open and respectful dialogue with the communities, Ecoener assumes the following general commitments with regard to community relations:

- **To listen to, know and analyse the expectations and needs of the communities.**
- To seek **long-term value creation** for the local communities through the programs and activities carried out in the territory.
- To reinforce respect for the rights of ethnic minorities in all communities where the company is present.
- To build ties and facilitate **effective participation** of the communities at all times, during the design, development, construction and operation of the projects.
- **To ensure the processes of Informed Consultation and Participation** when the project so requires.
- To define mechanisms and procedures to **facilitate the development of programs** and actions of support for communities.
- **To respect Human Rights** in all actions.
- To act in accordance with the various international reference standards.
- To adjust the activities of the company according to the social and cultural reality of the different places where it operates.
- **To communicate and verify compliance with the Policy.**

To build long-term relationships of trust, the general commitments materialize through all of the actions carried out by the company through the following three stages of action:

Stage 1: **Listening**.

Stage 2: **Respecting**.

Stage 3: **Progressing** with the communities.

## 4. Listening

Ecoener acknowledges that there are many **details that make the difference**. In each of the projects it carries out, it wants to plan ahead to know and **manage as well as possible the social risks and impacts associated** with the project, always ensuring the recognition of the capacities of people and of the territory.

Ecoener assumes the following commitments to **understand the local context and to listen to the communities**:

- To have the mechanisms necessary to **understand the local context**.
- To identify the relevant information and key monitoring indicators that make it possible to analyse and understand the initial situation of the community in the social, economic and environmental areas.
- **To identify all communities present** in the territory, including vulnerable groups, indigenous peoples and ethnic minorities.
- To maintain contact with the most representative stakeholders of the territory.
- To establish channels of communication and mechanisms that promote the **building of solid relations**, based on trust, good faith and mutual respect.
- To have permanent **listening tools and spaces**, that make it possible to know the concerns and interests of the local communities.
- To promote **respectful, continuous and transparent dialogue** during the stages of design, development, construction and operation of the projects.
- **To encourage the exchange of information**, providing clear and comprehensible information to the stakeholders.
- To identify, through listening processes, the main expectations, needs and interests of the community with regard to the project.
- **To adapt the consultation processes** (when required) depending on the decision-making processes, the linguistic preferences and the specific needs of the communities.

## 5. Respecting

The growth of Ecoener cannot be understood without **respecting the communities** where it operates. From the time of design of the projects, the company wants to establish relations based on recognition, trust and mutual respect. For this purpose, it assumes the following commitments:

- To recognize communities as territorial stakeholders and **to respect their identity**.
- To respect the opinions and rights of the communities, **treating all persons involved in a just manner and without discrimination**.
- **To always consider the characteristics and needs of the communities**.
- To recognize diversity and the right to maintain their customs and culture. **To promote and recognize equality of opportunity**.
- To respect and **comply with the specific regulatory requirements** of the various territories.
- To ensure that the activities carried out and the consultation and participation processes of the communities **will be free of practices such as tampering, threats, coercion and intimidation**.
- **To carry out analysis of risk** and potential opportunities of the project, in order to **know, analyse and evaluate the environmental and social impacts** of the projects.
- **To report in due time the adverse** economic, environmental and social **effects** of the projects. Providing necessary information in the first stages of the process.
- **To document the results** and the measures agreed on during the consultation and participation processes.
- **To facilitate the participation** of the communities during the different stages of the projects.

## 6. Progressing

Ecoener wants to progress to ensure **responsible management** with the local communities. The goal of this progress is to improve the **living conditions** of the communities, while respecting and protecting their culture. To this end, the following commitments are established:

- **To manage responsibly** the positive and negative impacts resulting from activities and actions in the territory of the company.
- **To promote territorial development**, making use of local labour, when this is possible.
- To prioritize, to the extent possible, **purchases to local suppliers and the use of the existing means and materials in the region.**
- **To accompany and finance projects of community interest** in the surrounding areas of the installations, projects that must respond to the priorities of the local communities and which will be in line with the goals of the company.
- **To define and execute an action** of work with the communities, that can be monitored, adapted and updated during the different stages of the projects, and which must provide an answer to the important issues identified in the stage of listening to the communities.
- **To assume the responsibility** with transparency when any community may be affected by the implementation of company activities.
- To ensure **continuous improvement** processes.

Ecoener will periodically revise the content established in this Policy, in order to adapt in accordance with the specific conditions and needs of each project.

## 7. Ethnic minorities and indigenous peoples

Ecoener **respects the rights of the ethnic minorities and indigenous peoples** present in the places where it operates its projects; therefore, it establishes the following commitments:

- To recognize and respect the unique nature of the **indigenous, tribal, aboriginal and native peoples**.
- **To encourage open dialogue** integrating the various cultural frameworks.
- To pay special attention to **consensus**, as provided in Convention 169 of the ILO.
- To have the necessary means to avoid negatively affecting the ways of life, habits and their customs.
- To recognize the appropriate procedures through their representative institutions. The consultations carried out must be made in good faith and in a manner appropriate to the circumstances, with the aim of reaching an agreement or obtaining consent regarding the proposed measures.
- To comply with current legislation and with the Convention 169 of the ILO which includes recognizing and respecting:
  - Rights to lands, their territories and resources, including water.
  - The right to their organization, to their social and economic structure.
  - The right to free, prior and informed consultation, respecting the standards in force in each country.

## 8. Compliance procedures

### 8.1 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 any possible related impact or noncompliance.

Ecoener expects great commitment by its employees for compliance with these provisions.

### 8.2 Communication

Ecoener promotes awareness and compliance with the commitments established in this Policy, which will be **available on the website** permanently.

In addition, is committed to communicating in a public and transparent manner, the programs and actions carried out in the framework of compliance with this Policy.

### 8.3 Approval

This Community Relations Policy was approved by Board of Directors on 10 June 2020.

### 8.4 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.



**GRUPO ECOENER, S.A.**

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