

2023

Community Relations Policy



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1. Introduction

A unique energy company

1.1 Justification

Ecoener is committed to **promoting sustainable development** with the aim of preserving the natural environment and contributing to social development. This involves seeking balance and maximum respect for the natural and social environment in which it carries out its projects.

Success is not only measured in numbers: the greatest success for Ecoener is the satisfaction of a job well done. This requires real commitment and respect for the principles of integrity, responsibility and long-term thinking. It also requires an excellent relationship with communities: **creating value in local communities must be the premise** of 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**. That is the only way of ensuring that the facilities blend in with nature, and **become part of the community** and its surroundings. That is why, just as each facility needs a specific design to protect the environment, it also requires a specific commitment to the communities.

Ecoener is a unique energy company, with its own culture and unique way of being. This Community Relations Policy, therefore, **sets out the commitments and principles that will guide** the company's **actions** when engaging with the communities that live in the regions where it operates.

1.2 Goal

The goal of the Community Relations Policy is to **facilitate the creation of value for communities and to build solid relationships of trust with the people that** live in the areas where Ecoener is present.

Ecoener acknowledges that local initiatives can contribute to strengthening relationships with communities.

This Policy lays the foundations for strengthening existing and future relationships with local communities.

2. Regulatory framework

2.1 International Standards and References

Wherever possible, Ecoener will act in accordance with **international reference standards** and voluntary initiatives, including, but not limited to, the following:

- The United Nations Sustainable Development Goals (SDGs)
- The 10 Principles of the United Nations Global Compact.
- 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 Organisation (ILO) on Indigenous and Tribal Peoples
- The Equator Principles.
- The Tripartite Declaration of Principles on Multinational Enterprises and Social Policy of the International Labour Organisation (ILO).
- The United Nations Basic Principles and Guidelines on Development-based Evictions and Displacement.
- Other pertinent standards.

2.2 Internal References

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

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

3. General Commitments

Social engagement with communities is part of Ecoener's business activity.

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

- **To listen to, understand, and analyse the expectations and needs of the communities.**
- To seek **long-term value creation** for local communities through the programs and activities carried out in the area.
- To strengthen respect for the rights of ethnic minorities in all communities where the company is present.
- To build ties with the communities at all times.
- To cooperate with the authorities during the **Informed Consultation and Participation stages**, as required by the project.
- To establish mechanisms and procedures to **facilitate the development of programs** and actions to assist communities.
- **To respect Human Rights** in all actions.
- To act, where possible, in accordance with the various international reference standards.
- To align the company's activities with the social and cultural realities of the different places where it operates.
- **To communicate and monitor compliance with the Policy.**

To build long-term relationships of trust, the general commitments are embodied in all of the company's actions through the following three stages of action:

Stage 1: **Listening.**

Stage 2: **Respecting.**

Stage 3: **Moving forward** with communities.

4. Listening

Ecoener acknowledges that it is the **details that make the difference**. In each of the projects it carries out, Ecoener wants to plan ahead to understand and **manage as well as possible the social risks and impacts associated** with the project, while always respecting the capacities of people and the territory.

In order to **understand the local context and to listen to the communities**, Ecoener has made the following commitments:

- To have the necessary mechanisms to **understand the local context**.
- To identify the relevant information and key monitoring indicators that make it possible to analyse and understand the baseline situation of the community in social, economic, and environmental terms.
- **To identify all communities present** in the area, including vulnerable groups, indigenous peoples and ethnic minorities.
- To maintain contact with the most representative stakeholders in the area.
- To establish mechanisms that promote the **building of solid relationships** based on trust, good faith and mutual respect.
- To have **listening tools** that make it possible to know the concerns and interests of local communities.
- To promote **respectful, continuous and transparent dialogue** during the design, development, construction and operation phases of the projects.
- **To encourage the exchange of information**, providing stakeholders with clear and comprehensible information.
- To identify key community expectations, needs and interests regarding the project through listening processes.

5. Respecting

Ecoener's growth cannot be understood without **respect for the communities** in which it operates. From the design stage of its projects, the company wants to build relationships based on recognition, trust and mutual respect. To this end, the company has made the following commitments:

- To recognise communities as territorial stakeholders and **to respect their identity**.
- To respect the opinions and rights of communities, and **treat all persons involved fairly and without discrimination**.
- **To always take into account the characteristics and needs of communities**.
- To recognise diversity and the right to maintain their customs and culture. **To promote and recognise equal opportunities**.
- To respect and **comply with the specific regulatory requirements** of the various territories.
- To work with local authorities to ensure that the activities undertaken and community consultation and participation processes **are free of practices such as tampering, threats, coercion and intimidation**.
- **To report on the** economic, environmental and social **impacts** of the projects. Provide the necessary information in the early stages of the process.
- **To document the results** and the measures agreed on during the consultation and participation processes, where appropriate.
- **To facilitate the participation** of the communities during the different stages of the projects.

6. Progressing

Ecoener wants to make progress to ensure **responsible management** with 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 have been made:

- **To responsibly manage** the effects of its activities and actions in the territory in which the company operates.
- **To promote territorial development**, using local labour whenever possible.
- To give priority, to the extent possible, to **purchases from local suppliers and to the use of resources and materials available in the region.**
- **To accompany and finance projects of community interest** in the areas surrounding its facilities, which must meet the priorities of the local communities and be in line with the company's goals.
- **To take responsibility**, with transparency, when any community is likely to be affected by the implementation of the company's activities.
- To ensure **continuous improvement** processes.

Ecoener will review the contents established in this policy on a regular basis in order to adapt them 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 makes the following commitments:

- To recognise and respect the unique nature of the **indigenous, tribal, aboriginal and native peoples**.
- **To encourage an open dialogue** that integrates the various cultural frameworks.
- To pay special attention to **consensus**.
- To have the necessary means to avoid negatively affecting their way of life, habits and customs.
- To recognise the appropriate procedures through their representative institutions.
- To comply with the existing legislation and ensure the implementation of ILO Convention 169, which includes recognising and respecting:
 - Rights to lands, their territories and resources, including water.
 - The right to their organisation, to their social and economic structure.
 - The right to free, prior and informed consultation, respecting and in accordance with the standards in force in each country.

8. Compliance procedures

8.1 Execution and control

All Ecoener employees are required to know, understand and comply with the provisions of this Policy, regardless of the country or region where they are located. In addition, they must report any possible impact or non-compliance in this regard.

For that purpose, employees will be given a copy of this policy at the time of recruitment and will acknowledge receipt of it by signing a document pledging compliance.

Ecoener expects a great commitment from its employees to comply with these provisions.

8.2 Communication

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

Ecoener is also committed to public and transparent communication of programs and actions in compliance with this policy.

In the event that an employee or an external person* deems that a situation exists which is contrary to the provisions of our Human Rights Policy, they may communicate this in the following manner:

- By email: canaletica@ecoener.es
- By post: Cantón Grande, nº 6, 6º. 15003 La Coruña. Spain.

* Ecoener shall act responsibly to **protect informants' identities**, unless otherwise specified under applicable legislation, **in order to avoid any sort of retaliation, discrimination or penalisation.**

8.3 Approval

This Community Relations Policy was approved by the Board of Directors on 24 March 2023, and compliance with the Policy is effective as of that date.

8.4 Revision

This Policy will be reviewed periodically to ensure its effective implementation and to make any necessary adjustments.

All revisions and adjustments must be approved by the Board of Directors and will be announced at the Annual General 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 stakeholders.



ECOENER, S.A.

CIF: A-70611538
Cantón Grande N°6 – 6º,
15003, La Coruña