



# **Political neutrality behavior policy**

**December 2022**

## 1. Purpose

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The Board of Directors of Greenergy Renovables, S.A. ("GREENERGY" or the "Company") has the legal power to determine the Company's general policies and strategies.

Through this policy, Greenergy is committed to political neutrality. Greenergy's activities with respect to politicians, parties and various political offices will be non-partisan and will be based on the conclusion that such activities clearly support Greenergy's commercial interests and business objectives, always in compliance with the law and our internal rules of conduct.

## 2. Scope

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The Political Engagement Policy applies to all Greenergy Group companies, including subsidiaries in which Greenergy has effective control or the possibility of effective control.

Likewise, this Policy applies in all geographies where Greenergy develops its operations, of any nature, i.e., in any geographical area and at any stage of the corporate value chain.

In the case of subsidiaries in which Greenergy does not have effective control, Greenergy will do its best to promote that the actions of such companies are aligned with the commitments set out in this document.

Likewise, Greenergy will make its best efforts and use its levers of influence to procure a behavior aligned with this Policy among its stakeholders, especially in the supply chain.

## 3. Principles of action

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This policy prohibits donations, sponsorships or other contributions without consideration to political parties, political offices, or individuals who are members of political parties, or organizations related to any of these.

Likewise, Greenergy undertakes to disclose in its Sustainability Report the expenses incurred in hiring pressure groups or lobbyists, in the event that they are hired.

## 4. Whistle-blowing channel

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In order to facilitate communication by any person, employee or not of Greenergy, regarding any breach of the principles described in this Policy, a whistleblower channel is provided on the website that guarantees confidentiality.

Greenergy undertakes to put in place mechanisms for the remediation of any identified non-compliance.

## **5. Public nature of the Policy**

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This Policy is public and will be permanently posted on the Greenergy website, as well as any subsequent modifications.

## **6. Approval and supervision of the Policy by the Board of Directors**

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This Policy has been approved by the Board of Directors, which will rely on the Audit Committee for the supervision of its compliance.