



Windar renewables

Corporate sustainability policy

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Statement

Through this policy, the WINDAR Group defines the commitments that constitute the basis for implementing the necessary principles that allow the Corporate Sustainability Strategy to be directed toward the fulfillment of business objectives in the development of the organization's operations and activities, promoting its contribution to sustainable development and achieving value for all its stakeholders.

To this end, the WINDAR Group, within the framework of its Governance System, understands sustainability as the advancement of objectives related to social development, environmental balance, and economic growth that permeate each of the company's actions wherever it operates, both at its national and international headquarters, seizing opportunities and minimizing negative impacts on society and the environment throughout the entire value chain.

Sustainability currently constitutes the frame of reference upon which the WINDAR Group has established the principles that guide all of the company's actions at each of its locations around the world in relation to environmental preservation and social progress.

Following the roadmap outlined by sustainability, the company strives to create a culture in which its activities are carried out according to a set of values and principles that promote social development, preserve the environment, and foster corporate governance based on principles of responsibility, ethics, integrity, and transparency in each of its actions.

Considered a cross-cutting element, sustainability is integrated and complemented by the rest of the WINDAR Group's policies related to issues of relative importance to its stakeholders and associated with respect for human rights, the application of fair labor practices, environmental protection, and the prevention of corruption, among others.

Sustainable Development Strategy

Sustainability demands a focus on creating economic, social, and environmental value for the WINDAR Group's stakeholders through the sustainable development of business activities. In compliance with this mandate, the WINDAR Group has defined and developed a Sustainability Strategy aimed at creating this value across its business lines.

The Sustainability Strategy includes, among other priorities, the fight against climate change through the decarbonization of the global economy. To this end, it offers innovative, quality products that provide the market with clean, renewable electricity.

In line with its governance and sustainability models, the company works diligently and firmly with its stakeholders, such as employees, customers, suppliers, and communities, among others, to decarbonize the economy through the wind tower sections for wind turbines and substructures for onshore and offshore wind farms it supplies worldwide.

In this way, the organization's activities contribute to an increase in the emission-free renewable energy capacity introduced into the global energy system in the medium and long term, in line with the global energy transition objectives set at the European and global levels.

However, the Sustainability Strategy not only includes climate change as a framework for action, but also includes objectives related to respect for human rights, the development of fair labor practices, the environment, and the fight against corruption, among other goals.

The Sustainability Strategy is public and available to stakeholders on the corporate website.

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Commitments to Sustainable Development

Regarding sustainable development, the WINDAR Group has defined the following commitments:

1. Promote the company's Mission and Vision and promote corporate values by developing an operating model that includes sustainable environmental, social, and governance guidelines that create value.
2. Identify and manage material impacts, risks, and opportunities (IROs) related to the company's stakeholders through the Corporate Sustainability Strategy.
3. Facilitate the achievement of the strategic objectives that guide the company's Sustainability Strategy regarding environmental issues, respect for human rights, development of fair labor practices, and prevention of corruption.
4. Promote sustainable development through the integration of global objectives aligned with recognized reference frameworks such as the United Nations Global Compact and the United Nations Guiding Principles for Business on Human Rights (UNGPs), among others.
5. Promote the integration of sustainability at all levels of the organization through information and training on material issues related to impacts, risks, and opportunities.
6. Continuously improve the Corporate Management System, promoting effective governance as a way to ensure the creation of a culture of responsibility and ethics that fosters sustainable development through the best decisions regarding business operations.
7. Implement the necessary methods and controls to manage sustainability risks and opportunities, including regulatory and statutory compliance.
8. Share the success of the WINDAR Group with its stakeholders by reporting periodic, sufficient, accurate, and transparent information on the company's performance in relation to compliance with the Sustainability Strategy and the results of its sustainability policies.

Principles of Action

Grupo WINDAR is a member of the Spanish Network of the Global Compact of Nations. By joining this internationally recognized organization, we have adopted its ten principles related to the environment, human rights and labor practices, and the fight against corruption as a reference in our actions. As the organization responsible for implementing the United Nations Sustainable Development Goals (SDGs) of the 2030 Agenda, we also embrace these global objectives.

Regarding sustainability from a global perspective

Taking these frameworks of action into account, Grupo WINDAR has established the following sustainability principles:

- Integrate sustainability into the company's business model, management system, and at all levels of the organization and at all locations around the world, as a path to creating a culture of sustainable development for all participants in the value chain and stakeholders.
- Apply sustainability due diligence to each business process as a basis for identifying and assessing material impacts, risks, and opportunities related to the company's operations and the upstream and downstream phases of the value chain.

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- Maintain and reaffirm our commitment to quality management, occupational health and safety, the environment, information security and cybersecurity, compliance, and the fight against corruption in accordance with the WINDAR Group Policies.
- Collaborate with international organizations, entities, or agencies that pursue social development goals in the area of sustainability, both environmental and social, in order to combine efforts within the community.

Regarding sustainability from an environmental perspective

The WINDAR Group has established the following principles regarding environmental sustainability:

- Adopt the fight against climate change and the circular economy as key strategic objectives.
- Contribute to mitigating the effects of climate change and the circular economy by acting as a driving force for members of the value chain in achieving these objectives.
- Integrate climate change and the circular economy into decision-making processes, as well as in the identification, assessment, and management of impacts, risks, and opportunities, both in the short, medium, and long term; Incorporating appropriate measures and tools for climate change adaptation and circularity.
- Deploy a decarbonization plan for our activities and sites with the goal of reducing greenhouse gas emissions globally and achieving long-term carbon neutrality.
- Promote the transition to a circular economy through "Zero Waste to Landfill" in our activities and sites with the goal of increasing the amount of waste recovered globally, thus minimizing landfill waste in the long term.
- Apply an approach to preventing and minimizing the environmental impacts resulting from the organization's activities related to climate change, the circular economy, air quality, environmental noise, water use and consumption, as well as biodiversity, forests, and land use, in order to ensure that the processes applied employ high quality standards.

Regarding sustainability from a social perspective

Grupo WINDAR has established the following principles regarding social sustainability:

- Generate value in the geographic locations where the company operates by creating jobs and promoting the local business community.
- Ensure the implementation of social policies that address the needs and expectations of stakeholders. These policies will cover aspects such as human rights, diversity, equal opportunities and non-discrimination, fair remuneration, occupational health and safety, and professional promotion and development.
- Respect and protect internationally recognized fundamental human rights, such as freedom of association and collective bargaining, the absence of child labor, and the elimination of forced or compulsory labor, among others.
- Absolutely reject any form of modern slavery and human trafficking, as well as any labor practice that may violate people's fundamental rights, including their dignity.
- Take into account vulnerable groups or people with special needs when developing social policies.

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- Maintain and reaffirm our commitment to quality management, occupational health and safety, the environment, information security and cybersecurity, compliance, and the fight against corruption in accordance with WINDAR Group Policies.
- Collaborate with international organizations, entities, or agencies that pursue social development goals in the area of sustainability, both environmental and social, in order to join forces with the community.
- with special needs.
- Provide safe and healthy work environments, adopting the principle of equal opportunities and non-discrimination based on race, nationality, social origin, gender, marital status, sexual orientation, age, religion, political ideology, disability, or any other personal, physical, or social condition.
- Promote diversity and inclusion, attracting and retaining talent through action plans such as training, development, and professional growth.
- Support a balanced professional and personal life through the implementation of appropriate work-life balance measures.
- Deploy social actions aligned with the business model and local needs, enhancing community participation, fostering integration within the region, contributing to social well-being, and improving people's quality of life.
- Promote education, cultural wealth, and industrial and cultural heritage, health, and research.

Regarding sustainability from a governance perspective

The WINDAR Group has established the following governance principles:

- Identify the interests and opinions of the main stakeholders in the value chain for the development of the dual materiality analysis process, through which the significance of impacts (potential and actual, positive and negative), risks, and opportunities with financial effects on the organization related to people and the environment are identified, evaluated, prioritized, and ultimately determined.
- Apply the principles of due diligence and responsibility through ethics and transparency in accordance with the company's Code of Ethics.
- Prevent the commission of crimes by promoting policies related to regulatory compliance, the fight against corruption, bribery and fraud, competition, and conflicts of interest, among others.
- Promote excellence in quality, innovation and research, and continuous process improvement, using the Sustainability Strategy as a lever for development.
- Ensure the continuity of business operations and activities through information security and cybersecurity practices, measures, and controls to minimize the risks of potential cyberattacks and avoid damage to the company or its image and reputation.
- Establish channels of communication, participation, and dialogue with stakeholders to identify their needs and expectations and manage the associated risks and opportunities.

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- Implement responsible communication practices to ensure fidelity and trust in financial, non-financial, and corporate information, as well as the privacy and security of the information provided.
- Report on performance and ensure accountability for compliance with the WINDAR Group's sustainability commitments through periodic reporting of reliable, rigorous, truthful, transparent, and relevant information for stakeholders.

Supervision and Control

The Board of Directors is responsible for promoting, implementing, and supervising the application of this Sustainability Policy. However, as it includes issues of relative importance related to environmental, social, and corporate governance aspects, specific functions are assigned to other internal bodies related to sustainability.

To control and monitor the Sustainability Policy, as well as the impacts, risks, and opportunities related to this matter and its management, the Company adopts the following mechanisms:

- ⇒ Promote the commitment to developing a sustainable business management model focused on value creation through the Sustainability Strategy, the Climate Action Plan, and other supporting instruments and specific actions that, aligned with the Company's Strategic Plan, encompass the medium- to long-term framework for action in this area and enable compliance with the principles, commitments, and objectives established in this Policy regarding environmental and social matters.
- ⇒ Promote the implementation and monitoring of sustainability due diligence, in accordance with the process described in the international instruments of the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.
- ⇒ Conduct a continuous assessment of the progress made on the commitments made and projects established in the area of sustainability, establishing measurable and evaluable objectives. To this end, the various Committees will meet periodically to discuss these matters.
- ⇒ Communicate the commitments made by the Company in the area of sustainability, and their monitoring and evaluation, through appropriate communication and reporting mechanisms.
- ⇒ Ensure that the Board of Directors, through the Sustainability and Climate Action Committee and other specific Committees depending on the subject matter, approve, monitor, and supervise the principles and guidelines set forth in this Policy.

The aforementioned supervision and control mechanisms are complemented by those established in the Risk Control and Management Policy and other Company policies.

Declaration of Principles

Achieving success and sustainability over time requires determining, establishing, and communicating to all our people, customers, suppliers, and other stakeholders the management commitments we have adopted that will allow us to achieve the objectives in the environmental, social, and economic aspects of our businesses worldwide.

This Sustainability Policy constitutes the guide that allows us to continuously improve the performance of our processes and meet the requirements across the entire scope and lines of business.

It will be applicable to all of the company's locations worldwide, covering management systems for quality, health and safety, the environment, information security, artificial intelligence (AI), CSR, sustainability, and compliance, and will be deployed through the following lines of business.

- **Technology and innovation.** Design and calculation of wind towers. IS management for systems that support corporate services of commercial, technology and innovation, HR, purchasing, administration, operations, quality and HSE, as well as the design and manufacturing processes of wind towers and offshore foundations.
- **Capital goods for the generation of onshore and offshore wind power.** Manufacture of tubular structures for onshore and offshore WTG. Manufacturing of offshore foundations.
- **Logistics services and storage areas.** Assembly of internal elements and transportation, storage, conservation and shipping of structures and equipment.
- **Steel treatment and processing services.** Storage, distribution, cutting, forming, assembly and welding, shot blasting and painting of steel products.

Orlando Alonso
PRESIDENT
Fecha: 01/08/2025



1

Strategy aligned with the energy transition

Actively collaborating in the decarbonization of our activities, calculating and reducing our carbon footprint and promoting the fight against Climate Change. Commitment to the UN Agenda 2030

2

Sustainable business management model

Generating initiatives that ensure that environmental, social and economic needs are integrated into business processes and improvement of the MS

3

Focused on stakeholders

Including especially customers, employees, suppliers, as well as the rest of the stakeholders and identifying and evaluating the needs and expectations to effectively address the opportunities they provide us

4

Ethical & responsible behavior

Complying the principles of the UN Global Compact, avoiding violations of human rights, transparently communicating our behavior and respect for the legitimate interests of the community and stakeholders

5

Well-being and safety of people & the environment

Establishing decent, quality, safe and healthy working conditions to prevent injuries and deterioration of health, as well as the preservation of ecosystems and the biodiversity of our environments and pollution

6

Responsible consumption of resources

Applying measures to reduce energy and water consumption and promoting the circular economy in our supplier supply chain through responsible purchasing and sourcing processes

7

Integration of risk management

Leading safe and firm practices that eliminate hazards and reduce risks in each area of action: employees, health and safety, environmental contamination, compliance, CSR and information security throughout the life cycle

8

Investment in continuous improvement

Determining investments and planning human and material needs that allow us to meet the needs and expectations of our stakeholders

9

Compliance and Crime prevention

Implementing and supervisory processes control for H&S, environment and information security, in addition to any other subscribed requirements, including clients

10

People's skills

Fostering the development of labor skills so that they are trained through training and information processes and can meet our objectives and promote themselves

11

Fight against corruption

Establishing a model of policies on corruption, competition, conflict of interest, money laundering and international operations, based on the analysis of criminal risks

12

Safe use of Information & AI

Protecting personal data, assets and key technological infrastructures in the facilities, ensuring that the information managed is accurate, available and not distributed without authorization

13

Participation, consultation and information

Promoting opportunities for participation of people and their labor representatives, through mechanisms made available to them to support the performance of the Management System

14

Deployment of policies

Complementing this Corporate Policy with other commitments and principles of action regarding the environment, human rights, labor practices and the fight against corruption