



Windar renewables

# CSR policy

Ethic conduct & human rights

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## Statement

The balance between environmental protection, social inclusion and economic growth and development without violating people's fundamental Human Rights, constitute for the company's Senior Management what is considered "SUSTAINABLE". That is, this concept includes, within the WINDAR Group's Sustainability Strategy, protecting and not violating fundamental human rights, nor the necessary working conditions for its workers. This is how we intend to achieve a more sustainable world in human values.

As a starting point, we understand that it is essential to respect the reference regulations on this matter at the national and international level, both through current legislation and the standards on Human Rights and working conditions applicable in each and every one of the countries where we operate, thus covering those places where rights have not developed in the same way as in developed countries.

For this reason, WINDAR Group is committed to carrying out its activities in an ETHICAL and RESPONSIBLE manner, in accordance with the values, principles and behaviors established internally and aimed at generating and maintaining the necessary value for its shareholders, employees, clients. and society in general, among other parties.

Senior Management is aware of these responsibilities for each of the local communities where it operates and as a whole in general, especially when it comes to respecting people's fundamental Human Rights.

With the aim of strengthening the Corporate Governance System and carrying out responsible, integral and ethical management of activities, a corporate responsibility (CSR) model has been adopted based on the international standard ISO 26001.

## Responsibilities

The objectives of this Policy will be applicable in all WINDAR Group companies and production centers in the world, where its principles of action must be met. Among them:

- ⇒ **Align with the company's mission, vision and corporate values.**
- ⇒ **Establish the general framework of action** of the company in relation to the management of corporate social responsibility practices to comply with the indicated principles.
- ⇒ **Constitute the driving element of responsible behavior** that must strengthen its people both internally and throughout the supply chain.
- ⇒ **Promote a culture of respect and awareness** among all people who are part of the WINDAR Group companies; especially, those that contain a greater risk of violation of human rights, and
- ⇒ **Transmit to all stakeholders** the commitment and relevance of Human and Labor Rights for WINDAR.

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### CSR Framework

#### General action framework

Our model is characterized by the ethical relationship with stakeholders, looking a balance between the interests of the company (business) and the expectations that the community has about the company: preservation of the environment, job creation, local wealth, conduct and behavior and many other issues.

However, issues related to the ethics and integrity of our people, respect for Human Rights and working conditions are of special relevance, which include a very wide range of risks and potential impacts.

Managing these issues requires mechanisms based on a due diligence model, which includes existing procedures in different areas and internal management systems, such as health and safety, the environment, regulatory and normative compliance, or security of the company. information and cybersecurity among other possible.

Therefore, this corporate responsibility (CSR) model is summarized in these key elements:

1. Due diligence in matters of Human Rights
2. Responsible management of the company,
3. Ethical relationship with stakeholders, and
4. Balance between business interests and community expectations.

To develop and advance the fulfillment of these four key elements, the WINDAR Group Senior Management has adopted and promoted principles of action based on the most recognized reference frameworks related to business sustainability, which are set out below:

- ⇒ The **Sustainable Development Goals (SDGs)** of the United Nations 2030 Agenda for Sustainable Development that we have integrated into our business model.
- ⇒ The **Principles of the United Nations Global Compact** to which we have adhered and related to the protection of Human Rights, adequate labor practices, the preservation of the environment and the fight against corruption.
- ⇒ The **UNGPs** or **United Nations Guiding Principles for Business** that we firmly adopt.
- ⇒ The **OECD guidelines** for multinational companies.
- ⇒ The **ILO conventions** (International Labor Organization).

Internally we have tools aimed at promoting and guaranteeing the strengthening of these reference frameworks and identifying potential risks and impacts in terms of business sustainability. Thus, we will be able to prevent, mitigate and determine effective repair and remediation mechanisms in the face of these impacts. For this reason, the policies, procedures, guides and internal regulations related to the above will also be part of the reference framework, among which are:

1. The WINDAR Guide to Human Rights;
2. The Code of Ethics for workers;
3. The Compliance Policies of the Crime Prevention System;
4. The Personal Data Protection Policy that guarantees this right to all natural persons;
5. The Supplier Relationship Policy and Supplier Code of Conduct;
6. The Occupational Health and Safety Policy and Golden Rules of safety;
7. The equality plans and Protocols against harassment established by the company;

## ➤ Social responsibility policy (CSR)

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#### Due diligence and remediation framework

To achieve the objectives of our business and sustainability strategy, WINDAR makes sure to promote the following fundamental commitments that will direct all its actions in each of its companies:

- Promote a culture of knowledge and respect for fundamental human and labor rights in all our societies, through periodic measures and actions aimed at training, awareness and sensitization.
- Integrate into our corporate management system the recommendations of the SDGs and the United Nations Principles regarding the management and mitigation of any possible impact on human and labor rights.
- Identify and evaluate the potential risks and impacts that our societies may generate on fundamental human rights through the activities and operations that we carry out, directly or through third parties.
- Implement a due diligence model on human rights to address, prevent and mitigate risks in those activities and operations with the greatest impact in this area, periodically evaluating its effectiveness.
- Provide all internal and external interested parties to WINDAR with a public complaint channel where they can anonymously report any case of violation of human rights, internally establishing management procedures for these complaints that guarantee adequate resolution for complainants.
- Develop remediation mechanisms that allow for the repair of human rights impacts, when these cases have materialized.
- Periodically monitor and follow the status of the due diligence model, paying attention to companies in which there may be greater risks of violation of human rights.

#### Framework for action on information reporting

- Report publicly through annual reports on non-financial information regarding the result of the effectiveness of the due diligence system.
- Reinforce and promote among our suppliers and subcontractors compliance with the commitments acquired by WINDAR regarding human rights, through measures and other actions that are included, among others, in the approval and evaluation processes.
- Inform the competent authorities about any fact that represents a serious violation of human rights and constitutes possible administrative or criminal infractions.

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### Commitments with stakeholders

The relationship of human rights with WINDAR's stakeholders will take into account the following considerations, needs and expectations of the company:

#### In relation to the workforce

The workers of WINDAR companies:

- They will act as a barrier to protect human rights, wherever they are and work.
- They will ensure full respect for fundamental human rights recognized by international legislation in the development of their activities in each of the countries where we are operating.
- They will comply with this Policy and the human rights regulatory framework that it includes.
- They will report any breach of corporate policies through the channels enabled by WINDAR in its internal information system.

#### In relation to the supply chain

WINDAR's suppliers and subcontractors are a key element in the development of this policy, which is why they will show total respect for the fundamental human rights recognized by international legislation in the development of their operations. In particular, supply chain members must meet the following expectations:

- They will take appropriate measures to prevent all forms of forced, compulsory labor or modern slavery in their company;
- They will promote respect for human rights in their own supply chain;
- They will reject all forms of child labor in their organization, as well as in their own supply chain;
- They will respect freedom of union association
- They will respect the right to collective bargaining of their workers,
- They will avoid all forms of discrimination related to the condition or characteristics of people in matters of employment; and
- They will set wages in accordance with applicable laws and respect minimum wages and permitted overtime.

#### In relation to the societies and local communities where we operate

Local communities constitute another key element for the development of WINDAR's human rights policy. In this sense, and where applicable based on the identified risks, respect for the rights of minorities and indigenous peoples in the places where we carry out activities will be reinforced.

#### In relation to partners or investors

Partners and shareholders are another of the necessary interested parties for the application of this policy. Those who have operational control of the WINDAR companies will be monitored through representatives on the committees and administrative bodies, for compliance.

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### Principles regarding the environment

In this framework our commitment is to ensure that we maintain a preventive approach that protects our environment, promoting initiatives that promote greater responsibility in this matter and favoring the development and dissemination of environmentally friendly technologies.

- ⇒ Reduce the environmental impact of our operations, applying new solutions through innovation so that we contribute to sustainable development.
- ⇒ Integrate and promote the fight against climate change by improving our environmental performance and working with industry leaders in the renewable energy sector.
- ⇒ Ensure the minimization of impacts on natural ecosystems, through the rational use of natural resources in operations and the minimization of waste generated, thus contributing to the circular economy and the protection of biodiversity.

### Principles regarding the human rights

Within the human rights framework, our commitment is to ensure that we support and respect the protection of internationally recognized fundamental human rights within our sphere of influence, while not being complicit in the violation of these rights and guaranteeing the inherent rights to all people who ensure their lives in dignity, justice and freedom anywhere in the world.

- ⇒ Integrate and promote the principles of the United Nations Global Compact on human rights, national and international standards, as well as values and principles of responsible conduct.
- ⇒ Ensure compliance with current regulations and legality regarding human rights, at all times and in each of the locations in the world where we operate.
- ⇒ Maintain a Code of Ethics that acts as a model of regulatory compliance, ensuring behavioral conduct that safeguards the reputation and integrity of people and the company.
- ⇒ Prevent negative consequences in terms of human rights resulting from our operations or business relationships with third parties.
- ⇒ Respect freedom of expression and ensure that everyone has all the rights and freedoms proclaimed in the Universal Declaration of Human Rights, without distinction of race, color, sex, language, religion, political opinion or any other type.
- ⇒ Respect and support the rights of vulnerable people and groups (such as indigenous peoples, refugees, migrants and any others considered as such).
- ⇒ Respect the right of non-discrimination of people due to any condition or characteristic such as gender, race, ethnicity, culture, sex,...., that makes them different;

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- ⇒ Monitor and reject all forms or practices of child labor, ensuring compliance with the minimum legal age to work in each country for job applicants, guaranteeing that no one under this age is hired.
- ⇒ Monitor and reject any practice or form of forced, compulsory labor or form of modern slavery, including its elimination in the supply chain, ensuring that it is also complied with and avoiding being complicit in this type of activities.
- ⇒ In the event that activities are going to be carried out in protected areas, or where there are indigenous peoples or ethnic minorities, respect their rights by conducting fluid dialogues with local communities;
- ⇒ Reject all forms of harassment, abuse or violence that people may suffer in the development of their activities, determining disciplinary measures against such events;
- ⇒ Maintain fluid and open dialogues with the local communities where we are present and with which we interact in each of the locations where we operate;
- ⇒ Respect the right of movement of people freely within each territory;

### Principles regarding labor practices

**Within the framework of labor practices, ensure that we support freedom of association and the effective recognition of our people's right to collective bargaining, the elimination of all forms of forced or coerced labor, including child labor, and the abolition of labor practices discrimination in employment and occupation.**

- ⇒ Promote a professional culture based on equal opportunities, diversity, non-discrimination, motivation of talent, safe work, health and well-being of people and society, within an environment and work environment that is as safe and healthy as possible.
- ⇒ Effectively recognize the rights and freedoms of affiliation and collective bargaining, and integrate and promote labor relations based on the same, without taking reprisals of any kind for them.
- ⇒ Ensure the culture of commitment and motivation of the people who are part of the company, ensuring that they perform in their field of action and can develop professionally through learning and continuous training, as well as decent working conditions in terms of salaries and work hours.
- ⇒ Integrate and promote responsible management with suppliers through objective, impartial, transparent processes, ensuring long-term relationships with key suppliers that contribute to common development.
- ⇒ Ensure that we provide relevant, adequate and necessary information about the products we manufacture to both our clients and the interest groups that require it.
- ⇒ Respect the right to have a decent remuneration and salary in accordance with established labor agreements, as well as the rules and regulations applicable in each country.

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- ⇒ Respect the right for people to carry out their activities in a safe and healthy manner;
  - ⇒ Prepare work calendars that include effective work hours, ensuring that these are met and the maximum permitted overtime hours are not exceeded;
  - ⇒ Support people's work-life balance.
  - ⇒ Supervise that private security companies and their personnel will comply with the following fundamental principles:
    - Carry out the contracted services under the requirements of WINDAR and with respect to the provisions of the legislation and regulations in force in each country, as well as policies, procedures and applicable internal regulations.
    - Not to intervene or interfere while they perform their services and functions, in the holding of meetings and demonstrations, nor in the development of possible political or labor conflicts that arise.
    - Not exercise any control over political, union, or religious opinions or the expression of such opinions.
    - Do not proceed in any case to the automated processing, or not, of data related to the ideology, union membership, religion or beliefs of people.
    - Do not communicate to third parties outside of WINDAR, except to judicial and police authorities and in the exercise of their respective functions, any information they know about the company's clients, or about people related to them, as well as about the goods and effects. whose security or investigation they were in charge of.
    - Do not use material or technical means when these may cause damage or harm to third parties, or endanger the general safety of third parties.
    - When exercising the right to strike, abide by what WINDAR provides and current legislation.

### Principles regarding corruption

**Within the framework of the fight against corruption, our commitment is to ensure that we fight corruption in all its forms, including extortion and bribery, thereby earning the trust of our people, clients, communities and other stakeholders.**

- ⇒ Integrate and promote the most recognized international transparency and anti-corruption recommendation and practice guides on the market.
- ⇒ Maintain behaviors and conduct based on ethics, transparency in our actions, and the strength of the Governance System.
- ⇒ Continuously improve the Crime Prevention and Compliance System, to ensure that ethical actions in our businesses generate the necessary trust from clients, society and interested parties.
- ⇒ Ensure fluid dialogue with the company's stakeholders, periodically communicating relevant information about activities, to meet their expectations and increase trust.
- ⇒ Promote and encourage the economic and social development and well-being of the communities in which we operate, through cooperation actions for local development and socially responsible actions within the company.

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## Monitoring and compliance with the CSR policy

The company, through this CSR Policy, informs all people who are part of WINDAR or are in any way related to it, that it has developed and implemented a "Crime Prevention System", the result of the commitment fundamental role of the company in complying, in all its actions and in the relationships it maintains with third parties, with all the regulations and laws that are applicable to it.

For this reason, all our people will act in all cases, complying with the Policies included in this Crime Prevention System (compliance, corruption, fraud,...).

Failure to comply with current legislation by third parties with whom we carry out a contract may result in the termination of the contractual relationship.

As indicated above, the following responsibilities have been assigned:

- Senior Management has the task of supervising and promoting compliance with the Policy and providing appropriate resources to implement it.
- For its part, the Sustainability Committee has the responsibility of annually reviewing and updating the CSR Policy if necessary, and implementing its objectives.
- The Supervisory Body will ensure compliance with the actions in an ethical and comprehensive manner.
- In compliance with the principles of action included in this CSR Policy, all employees personally assume the responsibility of following and supervising the actions, guidelines or indications integrated into the internal procedures, codes and any other information that guarantees their correct application.

In accordance with the above, we make a REPORT CHANNEL available to all people on our website: [www.windar-renovables.com](http://www.windar-renovables.com), for any confidential communication related to crime prevention.

