

MATRIX RENEWABLES (Spain), S.L.U.
ENVIRONMENTAL AND SOCIAL POLICY
2022

I. INTRODUCTION

Matrix Renewables (Spain) S.L. (hereinafter, "**Matrix**", or the "**Company**") is committed to conducting its business activities with honesty and fairness. An important part of honoring that commitment is making sure that everyone at Matrix upholds our standards of ethical business conduct. All the policies approved by Matrix shall be applied by all companies included within the Group, as well as to its parent company, Matrix Renewables (Spain) Holdings, S.L.U.

Matrix strives to conduct business in a way that promotes good environmental and social (E&S) practices and minimizes adverse E&S risks and impacts. Furthermore, as a company operating in the renewable energy sector, we are determined to contribute to decarbonization and tackle climate change in a just and responsible manner,

We believe the above is not only important to mitigate E&S risks and impacts but also to create value for Matrix and our stakeholders whilst operating in a sustainable and responsible fashion. Moreover, we strive to contribute to achieving the Sustainable Development Goals (SDGs) via robust E&S management practices.

Additionally, we use our best endeavors to ensure that all those acting on our behalf, whether they are employees, developers, contractors, third party intermediaries or agents, are aware of and share our commitment to conducting business ethically and in alignment with Matrix's policies.

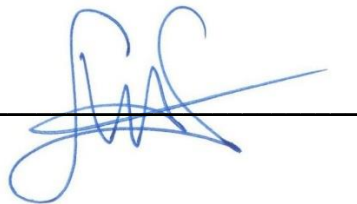
In accordance with these objectives, Matrix has approved this E&S Policy ("Policy") which refers to the need to comply with applicable laws and regulations but also borrows from international E&S standards, including United Nations' Universal Declaration of Human Rights, the ILO Fundamental Conventions, the IFC Performance Standards and other applicable international E&S standards. We understand that going above and beyond compliance with applicable E&S laws and regulations and achieving alignment with international E&S standards may take time and effort. In some cases, Matrix may need to put in place action plans to progressively achieve alignment with international standards within a reasonable timeframe. In any case, we believe that following good international E&S standards creates additional value to the company, its shareholders and society.

The Policy is intended to supplement other Matrix's policies. The Chief Operating Officer is responsible for overseeing Matrix's Environmental and Social Policy and the ESG Manager is responsible for the day-to-day implementation. You may reach them directly or by e-mail to raise any questions or issues (these may be raised anonymously). You may also seek advice or anonymously report any concerns through Matrix's dedicated whistleblowing channel, described in [Matrix's Whistleblowing Channel Policy](#). You will never be punished or face any retaliation in any way for raising questions or reporting possible issues in good faith.

Sincerely,

Luis Sabate

President and COO



II. DEFINITIONS

“Child” means a person under age 18.

“Child Labor” means any work performed by Child that is economically exploitative or is likely to be hazardous or to interfere with the Child’s education, or to be harmful to the Child’s health or physical, mental, spiritual, moral, or social development. Refer to ILO Conventions No. 138 – Minimum Age Convention and No. 182 – Worst Forms of Child Labour Convention.

“Employee” means any director, officer, contractor, or intern, both temporary or permanent, of Matrix and its subsidiaries, regardless of whether they develop their functions within the Spanish territory or abroad, as well as any other person affiliated with Matrix whom the Chief of Staff determines this Policy should cover.

“Forced Labor” means any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This covers any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. Refer to ILO Conventions No. 29 – Forced Labour Convention and No. 4 – Abolition of Forced Labour Convention.

“Good International Industry Practice” means the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances, globally or regionally.

“Group” means Matrix Renewables (Spain) Holdings, S.L. and its corresponding subsidiaries. This Policy shall be applied by the companies included within it.

“ILO” means International Labour Organization.

“ILO Fundamental Conventions” means the Following ILO Conventions: (i) Forced Labour Convention, 1930 (No. 29) , (ii) the Abolition of Forced Labour Convention, 1957 (No. 105) , (iii) the Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) , (iv) the Right to Organise and Collective Bargaining Convention, 1949 (No. 98) , (v) the Equal Remuneration Convention, 1951 (No. 100) , (vi) the Discrimination (Employment and Occupation) Convention, 1958 (No. 111) , (vii) the Minimum Age Convention, 1973 (No. 138) , and (viii) the Worst Forms of Child Labour Convention, 1999 (No. 182) .

“Matrix” means Matrix Renewables (Spain), S.L. However, this Code shall be applied to all Matrix’s group companies, as well as to its parent company, Matrix Renewables (Spain) Holdings, S.L.U. Consequently, whenever Matrix is referred to in this Code, such a reference shall be understood as Matrix and/or any company within its group of companies.

“Third Parties” means anyone who performs services for or on behalf of Matrix, and whose actions could be attributed to Matrix, including, among others, agents, consultants, advisors, lobbyists or other intermediaries, as well as developers, contractors and other individuals or entities that aim to perform services for or on behalf of Matrix in the course on Matrix's business including intermediaries who deal with government officials or private commercial parties on Matrix’s behalf.

“Trafficking” means the recruitment, transportation, transfer, harboring, or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

"Suppliers" means a third party in charge of the procurement of goods and services to Matrix, provided that it is not in a position to win business or to obtain or retain business advantages for Matrix.

III. SCOPE OF APPLICATION

This Policy applies to all Matrix (as well as its subsidiaries) employees, including directors, non-executive directors and other corporate officers, and staff, as well as agency workers, secondees, consultants and contractors, irrespective of their location, function, grade or standing, engaged by Matrix on its behalf and under its effective control.

Employees whose conduct or actions deviate from or are in conflict with this Policy will be subject to the consequences established by Matrix’s policies, the current applicable legislation, the Spanish Workers’ Statute and other applicable regulations (Spanish or otherwise), and the corresponding collective bargaining agreement, without prejudice to other civil or criminal liabilities in which the Employee may incur.

Additionally, as stated below, we expect our contractors to operate in accordance with this Policy and with Matrix Suppliers Code of Conduct. Failure to operate in accordance with Matrix’s policies may lead to the termination of the contracts between Matrix and Third Parties.

IV. PURPOSE

The Group understand that good environmental and social performance is key to achieve a positive impact and outcome in all the countries we operate in. This Policy captures Matrix’s key environmental and social commitments.

V. COMMITMENTS

The Company/Group is committed to the following:

A. Environmental, labor, health and safety and social laws and standards

- Comply with applicable environmental, labor, health and safety and social legal and regulatory requirements, including international agreements, conventions, treaties and/or standards applicable to the Group.
- Conduct business in a way that strives to achieve the goal of no environmental, health and safety accidents, no harm to people and no damage to the environment by taking a robust and

systematic approach to avoiding and, where not possible, appropriately managing environmental and social risks and impacts.

- Apply sound E&S management systems in our projects in alignment with Good International Industry Practice (GIIP).
- As appropriate, implement corrective action plans to ensure that we achieve alignment with GIIP and, more broadly, good international E&S standards within a reasonable timeline.
- Comply with any other international environmental, labor, health and safety and social requirements applicable to a Group company and/or a specific project (e.g. lenders' requirements).

B. Human Rights

- Respect the human rights recognized in the United Nations' Universal Declaration of Human Rights.
- Respect our people (including workers and contractors) and offer a safe workplace that is free from harm, intimidation, harassment, or fear. We commit to treat all people equally, with respect and dignity.

C. Labor and Working Conditions

- Not employ or make use of Forced Labor and not get involved in or facilitate the Trafficking of persons.
- Not employ or make use of Child Labor.
- Not discriminate in terms of recruitment, progression, terms and conditions of work and representation, on the basis of personal characteristics unrelated to inherent job requirements, including race, color, sex, religion, political opinion, disabilities, age, sexual orientation, national extraction or social origin.
- Not discourage workers from electing worker representatives, forming or joining workers' organizations and respect the right of all workers to join or form workers' organizations of their own choosing, to bargain collectively and to carry out their representative functions in the workplace.
- Pay wages which meet or exceed industry or legal national minima.
- Respect the maximum working hours established by the applicable laws and regulations and by international agreements and/or any other applicable to the Group.
- Ensure there is an appropriate grievance mechanism for all Employees and for Third Party workers involved in the construction, operation and/or maintenance of projects.

D. Health and safety

- Provide a safe and healthy work environment for our employees and require contractors to do the same for their workers and subcontracted workers.
- Ensure that all the projects have robust health and safety management plans in alignment with GIIP.
- Promote a safety culture across Matrix and Third Parties.

E. Environmental protection

- Implement measures to avoid, and where not possible, minimize/reduce or, as a last resort, compensate for material adverse environmental and/or biodiversity impacts associated with Matrix's and our contractors' activities.
- Ensure that all the projects have robust environmental management plans in alignment with GIIP.
- Contribute to combating climate change.
- Promote a culture of respect to the environment and biodiversity and efficient use of resources across Matrix and Third Parties.

F. Local communities

- Have a good understanding of how the Group activities may impact communities and their livelihoods and implement the necessary management measures to avoid and, where not possible, mitigate or, as a last resort, compensate for material adverse impacts on communities and/or cultural heritage linked to Matrix's activities.
- In relation to the above, take into careful consideration and appropriately manage any potential adverse impacts which cannot be avoided on vulnerable communities or groups, including indigenous communities.
- Respect the rights of indigenous communities which may be affected by Matrix's operations.
- Engage in an honest, timely and culturally sound manner with those communities impacted by our operations, paying special attention to vulnerable communities. Additionally, ensure that the Group has effective culturally appropriate grievance mechanisms to receive and facilitate the resolution of concerns and complaints.
- Ensure that all the projects have robust social management plans in alignment with international good practice.
- Strive to enhance positive impacts on communities, for example, via creation of employment opportunities for local communities, capacity building initiatives, community development plans and other initiatives.

G. Contractors

- Take the necessary steps to ensure contractors and, as applicable, sub-contractors operate in accordance with this Policy.

H. Suppliers

- Promote good environmental and social management practices across our supply chain. See Matrix Suppliers Code of Conduct.

I. Performance management and continuous improvement

- Monitor the Matrix’s E&S performance via performance indicators and ongoing monitoring.
- Seek opportunities for continuous improvement to enhance the Group’s environmental and social performance.

VI. AWARENESS AND TRAINING

This Policy will be communicated and available to all Employees and, as appropriate, to relevant Third Parties. Information and, as appropriate, training with respect to the Policy will be provided to relevant Parties affected by this Policy.

VII. REPORTING AND INVESTIGATION INTO MISCONDUCTS

Any violations of laws or regulations and/or Matrix's policies and procedures should be reported through the Whistleblowing Channel, available for Employees and external stakeholders in general. Any incident related to this Policy may be reported through said channel, whose complete terms are included in the Whistleblowing Channel Policy of Matrix.

The Chief Operating Officer of Matrix is the main body in charge of leading and supervising the procedure of the internal investigation in relation to this Policy, in accordance with the procedure included in the Whistleblowing Channel Policy of the Company.

Matrix will not directly or indirectly retaliate or discriminate any person who has in good faith reported any suspected violation of this Policy.

VIII. ONGOING REVIEW AND UPDATE

Matrix is fully committed to continuous improvement in all respects including environmental and social matters. Therefore, as part of this commitment, the implementation of this Policy will be monitored and the Policy will be subject to periodic reviews and, as appropriate, updates. The Chief Operating Officer, supported by the ESG Manager, will be responsible for ensuring that those reviews take place at least on a yearly basis.

POLICY OWNER	The Chief Operating Officer owns this Policy
APPROVAL	This Policy has been approved by the Board of Directors
IMPLEMENTATION	The Chief Operating Officer is responsible for ensuring that the governance structures and

	procedures are adequate to meet the requirements of this Policy
LATEST REVIEW	June-July 2022. No material changes made over previous version of this document (approved on June 23 rd , 2021).
DATE APPROVED	14 th July 2022
EFFECTIVE DATE	15 th July 2022
DATE OF NEXT REVIEW AND APPROVAL	No later than July 2024

ENVIRONMENTAL AND SOCIAL POLICY CERTIFICATION

I, _____, hereby certify that:

- I have reviewed the Environmental and Social Policy;
- I agree to abide by the Policy;
- I will review and comply with any future changes or updates to the Policy communicated to me in writing;
- I agree to report any potential violations through the **Whistleblowing channel** or by e-mail to **the Chief Operating Officer or, as the case may be, the Compliance Officer**, and I have already reported any potential violations of which I am aware;
- I understand that failure to comply with the Policy and all applicable laws in this respect may result in immediate termination and in referral for prosecution, with possible penalties including fines and imprisonment.

Signature

Date

Name (please print)

Location and Title

Delivery Instructions

Upon initial roll-out of the Policy, all current employees should complete this form and deliver to the Chief of Staff and the ESG Manager.

New employees should complete this form immediately upon hiring and deliver to the to the Chief of Staff and the ESG Manager.