



SOCIAL COMMITMENT

Esparity, S.L.

Calle San Vicente Mártir 90, 3ª planta, 46007-València, España

info@esparitysolar.com www.esparitysolar.com

CIF: B90329178



INDEX

1	INTRODUCTION
2	MISSION, VISION & VALUES THAT DEFINE ESPARITY
3	ESPARITY IN 2020
4	ETHICAL PRINCIPALS INTEGRITY COMPLIANCE WITH THE LAW CONFIDENTIALITY OPTIMISATION OF RESOURCES BUSINESS PLANNING AND MONITORING FRAUD, ASSET PROTECTION AND ACCOUNTING CONFLICT OF INTEREST AND LOYALTY TO THE COMPANY FAIR COMPETITION PROFESSIONALISM TRANSPARENCY RESPECT RESPECT FOR THE ENVIRONMENT RESPECT FOR PEOPLE RESPECT FOR HUMAN RIGHTS EQUAL OPPORTUNITIES AND ACCESSIBILITY PREVENTION AND AVOIDANCE OF DISCRIMINATION AND HARASSMENT



5

HEALTH AND SAFETY

PREVENTION OF OCCUPATIONAL RISKS

ACCIDENTS AT WORK
OFFICE ERGONOMICS
PSYCHOSOCIAL FACTORS

CORONAVIRUS MEASURES



1. INTRODUCTION

This Social Commitment outlines Esparity Solar's ("**Esparity**") basic principles of conduct and corporate values to ensure appropriate behaviour in the performance of the professional activity of its employees and managers. These principles must be followed on a day-to-day basis in all professional relationships, thus constituting the basic pillars of the way of working.

It is also helpful to continuously implement the establishment of certain non-negotiable minimum standards of behaviour applicable to all key areas of the company.

The nature of this Commitment is therefore not intended to cover all possible situations that may arise, but to provide a framework against which any activity can be measured.

In terms of the scope of its application, the Commitment is addressed to each Esparity employee, regardless of their position.

In addition, the company understands that all external collaborators or companies working with Esparity must abide by these principles and ensure that they are effectively practised.





2. MISSION, VISION AND VALUES WHICH DEFINE ESPARITY

MISSION

To make our contribution to achieving a more sustainable world, promoting the implementation of renewable solutions to the environmental crisis by being key participants in energy transition.

VISION

As a company dedicated to renewable energy, Esparity has in its DNA a sustainable vision. This is complemented with our commitment to contribute to the sustainable development of the energy transition in which photovoltaic solar energy is a driving force.

Esparity considers the protection of the social environment to be of paramount importance, based on business ethics and honesty.



VALUES WHICH DEFINE ESPARITY



- ✓ **Corporate responsibility:** Responsibility towards the environment, employees and stakeholders.
- ✓ **Working as a team:** Encouraging collaboration, freedom of expression, adaptability and equal opportunities.
- ✓ **Honesty:** Total transparency and honesty in the actions that define Esparity.
- ✓ **Pursuit of excellence:** At both company and project level with diligence, perseverance, quality of service and professionalism.



3. ESPARITY IN 2020

OBJECTIVES

1GW



586 MW with connection point

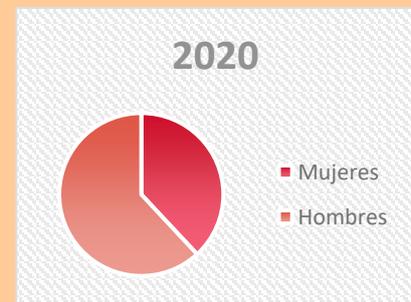
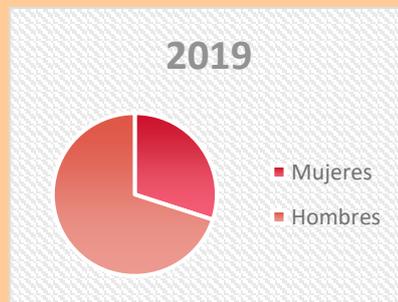
ESG POLICY IN 2021



+ 60%

Staff increase

INCREASING THE PRESENCE OF WOMEN



HOURS SPENT ON TRAINING

2020
1.674,31 h

2019
595,41 h

CREATING YOUTH EMPLOYMENT

Average age
2020
35 years

Student interns
2020
4.5%

% STAFF USING A CAR TO COMMUTE TO WORK

5%

FAVOURING PERMANENT CONTRACTS

% permanent contracts	
2020	2019
92.3%	87.5%



4. ETHICAL PRINCIPLES

All employees must carry out the business of the company in accordance with the principles of integrity, professionalism and respect as defined below.

4.1 INTEGRITY

4.1.1 LAW ENFORCEMENT

During business hours every Esparity employee must comply with the applicable laws and legal regulations in force at any given time.

In addition, employees must adhere to internal rules and regulations as applicable in any given situation. Such internal rules are company-specific and may go beyond the requirements of the law.

This responsibility also involves taking appropriate action after becoming aware of any irregularities practised by third parties that may compromise the name or interests of the company.

Esparity aims to create an atmosphere of trust at all levels within the company, inviting employees to express themselves freely. It also recognises the freedom to organise and not to practise any kind of discrimination related to its activities.

4.1.2 CONFIDENTIALITY

All employees must observe professional secrecy and keep confidential any information to which they have access owing to their position and duties. The disclosure and publication of such information may affect Esparity's interests should there be any breach in confidentiality. At the same time, such information must not be disclosed internally, unless its use is necessary for the normal performance of their duties.

In addition, employees must use their best efforts to prevent unintentional disclosure of information by taking special care when storing or transmitting confidential information.

If an employee believes that access to proprietary information by a third party requires a legal requirement or agreement, he or she should consult with those responsible for determining access to such information.

This obligation continues even after the termination of the employee's employment with the company.



4.1.3 OPTIMISATION OF RESOURCES

All employees must use the company's economic and material resources in a responsible manner, seeking to always optimise their use and not to obtain personal benefit from their use.

The company's facilities, equipment, services and economic resources are at the employee's disposal for the development and execution of their professional activity.

The use of the company's resources, intellectual property, time or facilities, including office equipment, photocopiers, company e-mail and any other items must be carried out in an efficient and appropriate manner.

Employees who are responsible for handling company funds are responsible for ensuring that they are used appropriately and efficiently, and always under authorisation and following the guidelines established for this purpose.

4.1.3.1 PLANNING AND MONITORING OF ACTIVITY

Esparity will plan its activities through strategic plans which will be known to all its employees and which will allow for a better control and monitoring system of the entity's activities.

4.1.3.2 FRAUD, ASSET PROTECTION, ACCOUNTING

Esparity undertakes to comply with the tax regulations in force in the jurisdiction where it resides. This is in accordance with the criterion of maximum transparency thus avoiding illegal tax evasion or obtaining undue tax benefits.

Legislation, regulations, as well as legal and commonly accepted accounting principles must be strictly complied with. This is in relation to the way entries and reports, that enable the disclosure and evaluation of all the company's financial records and results, are generated.

Employees must never engage in any fraudulent action or dishonest conduct involving Esparity's or any third party's assets or accounting. Such behaviour will not only result in disciplinary action but may also have criminal consequences.

4.1.4 CONFLICT OF INTERESTS AND LOYALTY TO THE COMPANY

Each employee is a representative of Esparity's interests and image during the performance of his or her professional activity and shall therefore avoid any conduct or situation that may damage the reputation or harm the interests of the company. Acting loyally and defending Esparity's interests is important.

Both partners and employees of Esparity shall conduct themselves honestly and responsibly in the performance of their activities, and shall not put their personal, professional, or financial interests before the interests of the company.



The selection of Esparity's partners and suppliers shall always be carried out solely and exclusively according to professional criteria and shall never be guided by personal gain. No gifts, cash or anything of value may be accepted directly or indirectly from any person or company that has or seeks to do business with the Company, except for non-cash gifts generally used for promotional purposes by the donor or courtesy gifts.

4.1.5 FAIR COMPETITION

Fair competition must be a basic element in all company operations. That is why Esparity competes legally and complies strictly with the provisions of applicable antitrust laws.

In addition, staff members are required to share and use information about our competitors provided it is legally and ethically permissible to do so. Just as Esparity values and protects its own confidential information, the confidential information of other companies must also be respected.

It shall therefore be ethical and legal to extract information from publicly available documents such as publicly available presentations, public speeches, annual reports and news, newspaper articles and publications.

It is strictly prohibited to engage in illegal or unlawful activities to obtain protected information (theft, eavesdropping, hacking, invasion of privacy, bribery, etc.). The employee is also prohibited from accepting, disclosing or using protected information that he or she knows or believes has violated a confidentiality agreement between a third party and a competing company.

4.2 PROFESSIONALISM

Esparity's employees should be characterised by a high level of professionalism, based on efficient and excellence-focused activity, and their behaviour should be based on the following principles:

4.2.1 TRANSPARENCY

All employees undertake to communicate information, both internally and externally, in a transparent, honest and truthful manner. Under no circumstances should any information be intentionally communicated that is incorrect, incomplete, inaccurate or could be misinterpreted by the recipient.

Therefore, all information provided must be truthful, objective, timely, complete, accurate and clear.

4.3 RESPECT

Esparity is committed to acting in accordance with universal principles in the areas of human rights and labour rights, as well as environmental protection.



4.3.1 RESPECT FOR THE ENVIRONMENT

Esparity places special emphasis on reconciling each of its projects with the demands of the environment; thus, in turn considering and incorporating the various socio-environmental factors of the territory in question. This is in strict compliance with legal obligations specific to the project to achieve harmonious integration into the ecosystem. To achieve this level of integrity, it is fundamental, and a cornerstone for Esparity, that the dialogue is transparent with stakeholders; in particular, with public institutions, civil organisations and interested individuals.

Furthermore, Esparity incorporates a minimum requirement of voluntary measures in project development primarily focused on the preservation of the environment and the socio-economic development of the localities where projects are developed. This is aside from the measures requested by the local authorities and is derived from the need for the mitigation of the potential risks related to the projects. The ultimate goal for Esparity is to give a seal of environmental responsibility to each of its projects.

Finally, in relation to external collaborating companies, Esparity staff members should transmit the company principles and demand compliance with the environmental procedures and requirements applicable in each case.

4.3.2 RESPECT FOR PEOPLE

Esparity considers people as a key business factor. Esparity also defends and promotes compliance with human and labour rights and is committed to the application of regulations and good practices in terms of employment conditions as well as health and safety in the workplace.

Company personnel will collaborate in strict compliance with applicable labour regulations and in the prevention, detection, and eradication of irregularities in this area. All employees are obliged to act, in their working relations with other employees, in accordance with the criteria of cordiality, respect, dignity and fairness, regardless of hierarchical position or function. Threats or harassment of any kind will not be tolerated.

All employees are responsible for strict compliance with occupational health and safety standards, and for the safety of themselves and others affected by their activities.

Esparity undertakes not to remove or restrict the rights granted to its employees by law, collective bargaining agreements or individual contracts.



4.3.3 RESPECT FOR HUMAN RIGHTS

Each employee undertakes to always act in accordance with internationally accepted ethical practices, with full respect for Human Rights and civil liberties.

Esparity complies with both national and international laws relating to child labour. Under no circumstances will the Company work with children under 16 years of age. It is also essential that all collaborating entities comply with this premise, following the guidelines set out by the ILO and the current regulations relating to child labour.

Any type of forced labour or service performed against one's will and under threat of punishment is strictly forbidden, as work is considered a right and not an obligation.

4.3.4 DISCRIMINATION AND HARASSMENT

Esparity respects the personal dignity, privacy and individual rights of each employee and is committed to maintaining a workplace where there is no discrimination or harassment based on race, nationality, origin, religion, gender, sexual preference, social class, marital status, age, weight, height, physical disability or other personal characteristics.

Therefore, any discriminatory treatment of employees, suppliers or customers that violates Esparity's ethical values will be met with appropriate disciplinary action.

4.3.5 EQUAL OPPORTUNITIES AND ACCESSIBILITY

All company employees shall have equal access to employment opportunities.

The potential of each individual and his or her own personal and professional qualifications should be the key factors to consider in the following processes: identification, recruitment, assignment of challenges and responsibilities, growth and training opportunities, performance evaluation, definition of remuneration and benefits.

Esparity seeks the integration of people at risk of social exclusion; thus eliminating any kind of hindrances to the integration of such people, as well as facilitating the marriage of work in the Company with personal and family life.

At Esparity, we promote equal opportunities and equal treatment of people, regardless of their sex, religion or beliefs, disability, age, sexual orientation and career. We believe that equality creates value and strengthens group culture.



4.3.6 ENCOURAGING THE HIRING OF PEOPLE FROM DISADVANTAGED GROUPS

The inclusion of people belonging to the following disadvantaged groups in the workplace is promoted:

- ✓ Women: Under no circumstances will there be discrimination based on sex in selection processes and equal opportunities between women and men will be promoted.
- ✓ Young people: When a vacancy arises, the post will be filled in accordance with agreements with specialised universities for the inclusion of this sector and subsequently, if this person fits in, they will be hired by the company.
- ✓ Immigrants: It will not be a hindrance, if you are from another country, to be hired at Esparity.
- ✓ Over 45s: Recruitment of qualified people over 45 years of age will be encouraged.

4.3.7 FLEXIBLE WORKING HOURS

Flexible working hours will be progressively introduced, with attendance on Fridays being optional. This facilitates family commitments and avoids commuting to work. This in turn reduces the company's carbon footprint.

A reduced working day is also provided for mothers and fathers who request it.

5. HEALTH AND SAFETY

This section aims to establish a guide and specify the measures that Esparity carries out for the protection of its employees in terms of occupational risk prevention with special emphasis on the situation with regards to COVID-19.

In doing so, the company assumes obligations such as:

- ✓ Informing and training employees about the risks and preventive measures regarding their position, as well as emergency measures and evacuation of the workplace.
- ✓ Offering workers the possibility of medical examinations at the company's expense.
- ✓ Document and carry out preventive activity planning

5.1 PREVENTION OF OCCUPATIONAL RISKS

With respect to the prevention of occupational risks, Esparity undertakes to carry out the following measures:



5.1.1 ACCIDENTS AT WORK

Although it is true that within Esparity's offices the probability of suffering an accident at work is very low, there are some factors that can generate some risk. The most probable risks are falls, blows and occasional accidents.

- ✓ Keep passageways clear of obstacles.
- ✓ Ensure that all cupboards, filing cabinets or drawer units in the installations are correctly fixed and anchored.
- ✓ Do not use chairs, wastepaper baskets, drawers or any other similar items to access the upper parts of the cabinets and shelves.
- ✓ Hire external professionals when carrying out the different electrical installations.
- ✓ Check the state of the equipment before use: cables, plugs, sockets, extension cables, etc.
- ✓ Do not touch the installations if they are wet.
- ✓ Everything must be accessible, especially things in common use.
- ✓ In case of anomaly or damage, always call a professional and inform all employees.
- ✓ All glass doors must be marked with a sticker of some kind, visible and located in the middle.

5.1.1 OFFICE ERGONOMICS

Ergonomics refers to the adaptation of the workstation to find the safest, most efficient and comfortable way possible. Therefore, the aim is to find the optimum relationship between the person and the static and environmental elements that make up the workstation.

- ✓ Work furniture:

Divide the work areas, so that people who must do work which is intellectually demanding are isolated from the noisy areas.

Do not exceed 70 decibels at any time, as the recommendation is to remain between 25 and 45 db. to maintain concentration.

Thermal comfort and air quality above:

- ✓ Acoustic comfort:

Limit the generation of indoor pollutants, avoiding their sources of emission as much as possible, such as smoke from work, ozone from photocopiers...



Adequate maintenance of the ventilation and air-conditioning system to ensure that all areas of the office can be adequately ventilated, preventing the distribution of possible sources of infection through ventilation ducts.

Control of windows and air-conditioning by the workers themselves, allowing them to adjust the temperature and humidity conditions to their needs.

Avoid the use of toxic products in the cleaning of the office. This service should be carried out in the absence of the workers.

✓ Lighting:

A good lighting system must ensure that each activity has the right level of lighting, depending on the size of the activity, distance, contrast, position, etc.

5.1.2 PSYCHOSOCIAL FACTORS

Work content and load, lack of participation and control as well as the working environment are some of the factors to be considered when assessing psychosocial risks.

- ✓ Designing the task according to the capabilities of each of the workers, incorporating training plans and training meetings on the work itself and aspects that most concern the workers.
- ✓ Creating a good working atmosphere based on a healthy working environment, guaranteeing respect and fair treatment, always avoiding any inequality or discrimination.
- ✓ Maintain open and flexible channels of communication both vertically and horizontally to transmit all types of information in a clear, dynamic and agile manner.
- ✓ Facilitate the participation of all employees to make them feel involved and encourage their commitment to the company.
- ✓ Establish staff promotion, thus rewarding the effort, commitment and responsibility of employees.
- ✓ Establish flexible shift work and timetables, bearing in mind that the company sets the timetable. Nevertheless, within the various shift options on offer, the health of the workforce should be considered.
- ✓ Establish a conflict resolution protocol.



5.2 CORONAVIRUS MEASURES

In view of the current situation, it is necessary to implement a series of temporary measures to guarantee the health of employees.

- ✓ Use of masks in the office.
- ✓ Air quality meter and ventilation system.
- ✓ Provide 2 FFP2 masks per week to all employees.
- ✓ Distance of more than 2 metres between employees' workstations.
- ✓ Measure temperature every morning before the start of the working day.
- ✓ Distribution of hand sanitisers in various areas inside the office.
- ✓ Facilities for working from home.
- ✓ Protocol established in the event of an employee presenting COVID symptoms.