COMMITMENT TO SUSTAINABILITY

Esparity Solar, S.L.
Calle San Vicente Mártir 90, 3ª planta, 46007-València, España
info@esparitysolar.com www.esparitysolar.com
CIF: B90329178

CONTENTS

1 INTRODUCTION

2 AREAS OF APPLICATION

3 BENEFITS, PREVENTATIVE & CORRECTIVE MEASURES – COMPENSATORY MEASURES WITHIN PV PLANTS

3.1 CLIMATE CHANGE

3.2 IMPACT ON SOIL

3.3 SOCIAL EFFECTS

3.4 WATER RESOURCES

3.5 LANDSCAPE / VISUAL IMPACT

3.6 BIODIVERSITY

3.7 WASTE

3.8 FOSTER COORDINATION AND JOINT WORK BETWEEN DEVELOPERS

3.9 ENCOURAGE R&D WITH POSITIVE ENVIRONMENTAL IMPACTS

3.10 PROMOTING R&D WITH POSITIVE ENVIRONMENTAL IMPACT

4 COMPLIANCE AND MONITORING

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1 INTRODUCTION

Esparity Solar SL (known as "**Esparity**") from the outset has always strived to contribute to slowing down climate change by committing to renewable energies, through its activity as a developer of photovoltaic projects and its commitment to protecting the environment and biodiversity.

Therefore, this document aims to specify and formalise its commitment by establishing preventive, corrective and compensatory measures with the aim of minimising the impact of the company's economic activity on the environment.

2 SCOPE OF APPLICATION

The current Commitment to Sustainability encompasses both Esparity Solar S.L. Unipersonal and all its subsidiaries and related companies, both current and those that may be set up in the future. Likewise, Esparity will promote knowledge of this Commitment to Sustainability to third parties and interested parties with which it maintains a relationship.

3 BENEFITS, PREVENTATIVE, CORRECTIVE & COMPENSATORY MEASURES REGARDING PV PLANTS

3.1 CLIMATE CHANGE

COMMITMENT	MEASURES
Development and promotion of PV plants	✓ Encourage the implementation of renewable energy in the electricity production system, with photovoltaic solar energy being the preferred technology to prevent current climate change problems and contribute to achieving global targets for reducing greenhouse gas emissions. (PNIEC 2021-2030, Paris Agreement...)

COMMITMENT	MEASURES
Reduce the Carbon Footprint of PV plants:	✓ Employ local personnel. ✓ Purchase local products, raw materials and building materials where possible. ✓ Use of low emission or electric vehicles in construction and maintenance. ✓ Reduction in use of concrete.

COMMITMENT	MEASURES
Offset the emissions which cannot be avoided:	✓ Possibility of installing solar panels in the plant's buildings. ✓ Possibility of CO^2 absorption projects: forestation or reforestation (prioritising areas close to the plant and use of local facilities) ✓ Possibility of installing solar panels in municipal buildings.

3.2 IMPACT ON SOIL

COMMITMENT	MEASURES
Selection of most ideal locations:	Prioritising the location of the installations in: ✓ Areas of low environmental value ✓ Croplands with low agrological value. ✓ Places with proximity to where energy is generated.

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COMMITMENT	MEASURES
Respect the natural formation of the topsoil:	✓ Minimum distance of 0.80 metres between the photovoltaic modules and the ground to allow for homogeneous vegetation cover. ✓ Prohibition of herbicide use, to be replaced with mechanical control and/or grazing. ✓ The arrangement of the photovoltaic panels should always respect large trees in solar parks.

COMMITMENT	MEASURES
Use of existing roads. If not possible, on new roads:	✓ Maximum use of plot boundaries. ✓ Minimise the impact on existing vegetation. ✓ If, due to construction needs, some roads need to be widened, replanting of vegetation and restorative actions will be carried out in the areas that may have been affected.

COMMITMENT	MEASURES
Reduction in the use of concrete in the construction of the installations	✓ Decrease the amount of concrete used in making foundations ✓ Fences and structures to be placed only where it is technically viable. ✓ Use of concrete in ditches and paths to be avoided. Gravel or compacted stone to be the alternative. ✓ Solar trackers will be used instead of fixed structure panels to avoid cementing and to increase the efficiency of the installation.

COMMITMENT	MEASURES
Respect the soil:	✓ Dual land use (grazing, agriculture, beekeeping...) when the conditions of the land make it possible. ✓ The ground will not be waterproofed in the project, except at the base of the huts and the substation. ✓ Fertile soil should not be removed and, if permitted, the necessary criteria and procedures should be followed for the restoration of the plant cover and ecological processes of the land. ✓ A decommissioning project or plan should be drawn up to return the land to its original state at the end of the useful life of the installation.

COMMITMENT	MEASURES
Reducing earth movement:	✓ Favour the location of facilities in flat areas. ✓ If earthworks are necessary, priority will be given to the reuse of the land within the area of activity. ✓ Where appropriate, an earthworks study will be carried out at the development stage to minimise environmental impact.

3.3 SOCIAL EFFECTS

COMMITMENT	MEASURES
Reduce the carbon footprint, contribute to rural development and the fight against depopulation:	✓ Create local jobs in the construction and operation of the plants. ✓ Prioritise the contracting of goods and services according to the distance from the plant. Local suppliers will be used, provided that they meet the required technical and competitive pricing conditions. ✓ Corporate Social Responsibility (CSR): o Activities with people at risk of exclusion. o School visits. o Awareness-raising days. o Training. ✓ Avoid the displacement of livestock farming activities from the area where the facilities are built. Encourage the use of the land of the facility (once built) for grazing if it is feasible in terms of proximity to such livestock farming activities. If the area has a pastoral activity or is close to transhumance routes, shepherds will be allowed to pass through to the required facilities if need be.

3.4 WATER RESOURCES

COMMITMENTS	MEASURES
Maximum efficiency in the use of water for cleaning purposes:	✓ Reduction in the use of chemical products in water used for cleaning. ✓ Use of the most efficient technologies and techniques, prioritising the use of recycled water without chemicals that could affect the ecological quality of the land. ✓ Existing watercourses will be respected, paying special attention to areas of Public Hydraulic Domain. If drainage is necessary, it will be carried out with the least possible impact and favouring the use of natural materials (DPH protection zone).

3.5 LANDSCAPE/ VISUAL IMPACT

COMMITMENTS	MEASURES
The orographic characteristics of the area should be considered to locate the PV installation where it will have the least visual and landscape impact. The layout of the evacuation line will be optimised to reduce its impact.	✓ Move the route of the evacuation line away from the existing populated areas and, as far as possible, from all housing developments. ✓ Design the route on flat terrain, avoiding the use of steep slopes. ✓ Prioritise the location of the evacuation line supports in places with existing access.

COMMITMENTS	MEASURES
Maintenance of corrective measures to reduce landscape impact:	✓ Mitigate the visual impact, through natural elements such as shrub islands or plant barriers. Always use native plant species. ✓ In areas where the project is implemented, a landscape integration study will be carried out. ✓ Priority will be given to locating the trenches parallel to existing roads and minimising their length. In addition, they will be covered with the excavated topsoil to allow for revegetation. ✓ Trenches will not be made for connection wiring between panels. The wiring will be run conveniently fastened underneath the panels. ✓ Limits to maximum height for photovoltaic installations on the ground where there are special landscape effects (2-3m). ✓ The auxiliary installations of the plant will be carried out taking advantage, where appropriate, of the existing constructions on the land where the plant is located. If they do not exist, the auxiliary installations will be built where the land has less agrological value within the plot ✓ The evacuation power lines will be laid underground. If, for justifiable reasons, the above is not possible, legal provisions will apply.

3.6 BIODIVERSITY

COMMITMENTS	MEASURES
Protect biodiversity in areas where the facilities are built, with special emphasis on protecting local species:	✓ The most advantageous location will be selected. ✓ In the selection of these projects, priority will be given to establishing collaboration with institutions, associations and groups working to protect local protected species. ✓ Use of permeable fencing for fauna: specially designed with tunnels, to allow for the passage of birds and other animals. Thus in turn ensuring connectivity and continuity and avoiding the fragmentation of the natural habitats of local species. It will have reflective signs along its entire length to prevent damage to wildlife. Alongside the outside of the fence, a band of at least 5 metres wide will be created and reforested with both tree and shrub species to avoid wildlife collisions with the fence. ✓ Use of land that does not have facilities for planting aromatic plants and other native herbaceous species. ✓ Allowing and encouraging the growth of vegetation. ✓ Establishment of ecological corridors in large plants.

COMPROMISOS	MEDIDAS
Protect biodiversity in the environments in which installations are carried out, with special emphasis on protecting local species and cultural heritage:	✓ Introduce in any of the revegetated surfaces: stone cairns, amphibian ponds or water points, wooden posts for birds of prey, beehive nets, nest boxes... ✓ Lighting at night will be strictly essential, avoiding light pollution of the sky. ✓ Infrastructures will be created to support the improvement of the availability of food for animals and insects. Of prime importance is the maintenance and expansion of species destined to feed birds of prey. ✓ Extension of the birdlife monitoring studies already carried out in the phases prior to the operation, monitoring behavioural patterns and modification of habits once the facility has been built and during the first years of its operation. ✓ Choice of the type of supports for the evacuation lines, paying attention to measures for the protection of birdlife. ✓ Priority will be given to carrying out the noisiest work at times when fauna is least affected.

3.7 WASTE

COMMITMENTS	MEASURES
Proper waste management and incorporation of the Circular Economy:	✓ Reduce the use of equipment. ✓ ✓ Increase reuse and recycling. ✓ ✓ Correct storage of stock. ✓ Carry out an exhaustive control of the chemical products used in the park. ✓ Proper waste management in the decommissioning phase. ✓ A waste management study will be drawn up for each of the plant's projects. .

3.8 FOSTERING COORDINATION AND JOINT WORK BETWEEN DEVELOPERS

In areas where there are photovoltaic developments nearby, collaboration between developers will be encouraged to guarantee the global analysis of the environment, as well as the study of the biodiversity of the area based on a holistic approach.

In this way, the study of the cumulative and synergistic impacts of the installations will be integrated into a single analysis, achieving greater effectiveness and efficiency in the treatment and approach to the most relevant environmental aspects, such as birdlife and the landscape and, if possible, sharing the evacuation infrastructures with the rest of the developers.

3.9 PROMOTING R&D WITH A POSITIVE ENVIRONMENTAL IMPACT

The sector is also committed to working with universities and scientific centres that require it to carry out experiments and research projects to improve the environmental integration of the facilities.

4 COMPLIANCE & SUPERVISION

The monitoring of the effective application of this Commitment is a function attributed to the Sustainability, Compliance and ESG Committee, as well as to promote, monitor and periodically review the alignment of current environmental challenges with Esparity's strategy and activity.

The Sustainability, Compliance and ESG Committee supervises and monitors this Policy through objectives and indicators that it must report periodically to the Compliance and ESG Committee.

The Board of Directors, through the Sustainability, Compliance and ESG Committee, is responsible for evaluating and approving this Environmental Policy, as well as periodically monitoring and evaluating the overall integration of this Policy. In the event of a breach of any of the commitments or principles of action contained in the Environmental Policy, Esparity will take the appropriate measures.

Esparity has created a communications channel for both employees and third parties to voice any issues or make suggestions, as well as to report unethical or illegal behaviour which they are aware of: compliance@esparitysolar.com.