

Compliance Policy

ABEI Group



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1. DECLARATION OF INTENT

Currently, ABEI Group (hereinafter also "the Group") is a business group of reference in the renewable energy sector as a result of its focus on excellence and the effort and work of all those who work in the Group. However, the inappropriate behavior of any director, employee or third parties with whom the Group relates by reason of its activity can seriously and immediately damage its image and reputation.

Therefore, we want to actively prevent and avoid this possibility, through the establishment of a robust culture of compliance in the organization. To this end, ABEI Group promotes compliance with ethical principles, good corporate governance, quality and excellence in the Group's activity and corporate values (integrity, flexibility, responsibility, innovation, predisposition and commitment).

The ABEI Group's compliance culture establishes the pillars on which the business model and decision-making are based, in an increasingly global and changing environment. As a result, it is very important that all members (directors, managers and employees), carry out their activities with the firm commitment to comply with current legislation and regulations, as well as with the values and ethical principles contemplated in the Code of Conduct and the rest of the corporate policies, procedures and internal controls that result from application.

2. PURPOSE OF THE POLICY

This **Compliance Policy** is a manifestation of the ABEI Group's express commitment to comply with the regulations applicable to the Group by reason of its activity, as well as to join forces to align itself with the best practices of Corporate Governance and the highest standards of integrity, ethics and transparency.

It is, therefore, a text aligned with the strategic objectives of the Group and, consequently, with its determination **not to tolerate within it any conduct that may constitute non-compliance**. Based on this commitment to compliance, the parameters of conduct expected of all the Group's professionals are established, especially those who hold decision-making among their powers (administrative body).

3. SCOPE OF APPLICATION

This Policy is applicable to each and every one of the directors, managers and employees of the companies that make up the ABEI Group. Any breach of this Policy will be treated as a serious disciplinary offence and may be subject to further disciplinary action in accordance with the Disciplinary Regime.



In the same way, the ABEI Group requires all third parties with whom it relates in its professional activity the highest standards of compliance with the law.

4. PRINCIPLES OF ACTION

The ABEI Group has a Criminal Compliance Model responsible for the management and organization of risks, the supervisory body being the Supervisory and Surveillance Body.

The principles of action by which this Policy is governed are the following:

- a) **Respect for legality:** The activities will be carried out in strict compliance with applicable legislation and current internal regulations.
- b) **Promotion of the preventive culture:** The basic principle of action will be zero tolerance to the commission of illicit acts and in the application of the ethical principles of ABEI Group. To this end, the Group's managers and employees in their decision-making process must integrate the concurrence of four basic premises:
 - that the action is ethically acceptable;
 - that it is legally valid;
 - desirable to the Group; and
 - that the professional is willing to take responsibility for it.
- c) **Ethical integrity in relationships:** The business and professional activities of all ABEI Group professionals (administrators, managers and employees) will be based on the values of integrity, honesty, respect and avoidance of all forms of corruption.

Relations with Public Administrations and other regulatory bodies will be governed by the principles of transparency, mutual trust, good faith and loyalty, providing the necessary cooperation in case they need to verify compliance with legal obligations.

- d) **Maximum transparency:** An environment of transparency will be maintained at all times, maintaining the appropriate internal and external channels to favor the communication of possible irregularities.

Finally, it should be noted that ABEI Group, in order to support the implementation of this corporate culture, has a wide range of internal regulations and has implemented measures to guarantee at all times the legality of the acts that, in the exercise of their professional activities, are carried out by the Group's employees and managers.

It is the responsibility of all ABEI Group professionals to know the regulations that apply to them and, in case of doubt, to contact their hierarchical manager or the Supervisory and Supervisory Body of the ABEI Group (depending on the purpose of the consultation) in the terms and in the manner described in the procedure of the Group's Internal Information Channel.

5. COMMUNICATION OF BREACHES

ABEI Group has enabled an Internal Information Channel so that any employee, manager and third party who works with or for the Group, can report knowledge or suspicion of the commission of irregularities observed in the professional practice.

The terms and channels of the ABEI Group Internal Information Channel are described in the Internal Information Channel Policy.

The communication channel provided for in the aforementioned procedure of the Group's Internal Information Channel is articulated as a confidential system and whose use will not entail any type of retaliation as long as such denunciation is made in good faith.

It should be noted that communications may be made anonymously, if the reporting person so wishes, although this implies that the level of detail of the communications made must be sufficiently exhaustive for their admissibility.