



NON-FINANCIAL
INFORMATION STATEMENT
2022

Content

1.	Introduction	3
2.	Business Model	4
3.	Information about environmental matters	7
3.1.	Circular economy and prevention and management of waste	10
3.2.	Sustainable utilization of resources	13
3.3.	Climate change	14
3.4.	Protection of biodiversity	15
3.5.	Environmental risks	16
4.	Information on social matters and personnel	16
4.1.	Employment	16
4.2.	Work organization	23
4.3.	Health & Safety	24
4.4.	Social Relations	25
4.5.	Training	26
4.6.	Universal accessibility for disabled persons.	27
4.7.	Equality	28
5.	Information on respect for human rights	29
6.	Information on fighting corruption and bribery	31
7.	Commitment to society	32
7.1.	To sustainable development	32
7.2.	Awareness and sensitization campaigns	34
7.3.	Subcontracting and suppliers	35
7.4.	Consumers and clients	36
7.5.	Tax information	37
8.	Annexes	39
8.1.	Compilation of communication and awareness campaigns.	39
8.2.	Operational details of the Group companies	50
8.3.	Subjects pursuant to Law 11/2018 on Non-financial and Diversity Reporting: material subjects for Gransolar and reporting criteria	51

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1. Introduction

The European Commission has implemented a set of proposals to **adapt the EU policies on climate, energy, transport and taxation in order to reduce net greenhouse gas emissions by at least 55% by 2030**. In 2019 it worked on a policy to provide the EU with a sustainability strategy for Europe 2030. Since then, the new European Commission (2019-2024) designed and defined the EU Green Deal.

In view of this, an ambitious sustainability report has become indispensable. These reports allow for disclosure and reporting of the environment, social and governance objectives (also known as ESG), in which companies report their progress towards these goals. The aforementioned goals also allow companies to be more transparent regarding the risks and opportunities they face, providing stakeholders with a better understanding of their performance beyond purely economic matters.

The most widely accepted format at world level is the Global Reporting Initiative (GRI), which has published several guides or documents that organizations can use to help them prepare their reports. The main benefits of sustainability reporting include the following items:

- a. It permits performing a comprehensive assessment of the organization's performance.
- b. It serves as the basis for continuing improvement of the results.
- c. It consolidates links with stakeholders.

At Gransolar, we base our management on excellence, responding to the needs of our stakeholders, providing value to society and seeking economic and environmental sustainability.

We believe that our stakeholders are all collective groups in society who are, or could be, affected by the company's activity, either now or in the future, and/or who legitimately affect, or could affect, the company's activity, and consequently, our results.

The organization's stakeholders are as follows:

- Our employees, including all office staff, site staff, factory staff and senior management.
- Our customers, understanding such to be not only the entities or organizations we build photovoltaic projects for, but also the Public Administrations and local communities who benefit from our projects.
- Suppliers and contractors.
- Shareholders and investors.
- The environment, as the physical and biological factors that are affected by and which affect the work we carry out.

At Gransolar Holdings we have chosen APlanet as the tool to guide us and help us to be more efficient in compiling and managing all the necessary ESG data required for non-financial reports and CSR reporting as it brings all the GRI indicators together.

Furthermore, in view of the socio-economic instability throughout 2022, Gransolar believed it was necessary to identify some personalized ESG KPIs for the coming years for decision-making purposes and also to tackle the challenges we face in an ever-changing environment. Consequently, we kicked off a complete exercise taking market trends, new demands by our stakeholders and possible disruptions in the future into account. The objective of this exercise is to focus our efforts on issues that have gained more relevance, and thereby manage any related risks more effectively.

2. Business Model

GRANSOLAR HOLDINGS, S.L. and its Group companies make up a business group (hereinafter, the "Holdings" or "Gransolar"). The Group's activities mainly consist of the construction of the components required for photovoltaic projects, and the design, construction and management of the solar facilities.

Gransolar Holdings carries out its different activities nationally and internationally in over 17 countries. The countries where our main operations take place are: Spain, Australia, USA, Portugal, South Africa, Brazil, Mexico, Chile, Saudi Arabia, United Arab Emirates, Türkiye, Italy and Bulgaria. Annex I of the Financial Statements shows the details of these companies and their geographical locations. We have offices in Australia, USA, United Arab Emirates, Brazil and South Africa, and Holdings is the owner or joint owner of different photovoltaic plants in Italy, Bulgaria and Brazil, among others. A factory in Saudi Arabia was opened this year, which is now fully operational.

We currently have three operating factories, two in Spain and the third one in Saudi Arabia. In addition to our head offices in Madrid, we have an engineering office in Almeria, and a laboratory/industrial building in La Gineta (Albacete). We also operate many photovoltaic facilities in Spain, Australia, United Arab Emirates, Portugal and Bulgaria, among other locations.

Holdings covers the design, manufacture, construction and maintenance processes of our Photovoltaic Plants.

- **Manufacture of components:** We produce and supply innovative industrial designs, specializing in solar components. The following activities are carried out in this line of our business:
 - Manufacture, supply, assembly and commissioning of trackers and their components.
 - Development and implementation of photovoltaic solar plant monitoring and control software, both at industrial and commercial levels.
- **Controllers,** a panel position optimization system to optimize power generation.
- **Engineering:** Gransolar Holdings has an independent quality control laboratory for its photovoltaic modules, and performs on-site inspections and performance tests at photovoltaic plants. Moreover, our team of engineers are in charge of design and optimization projects of large photovoltaic projects and industrial self-consumption

facilities. We have a sustainable energy research and development division which is currently applying the finishing touches to Green Hydrogen projects using rain water.

- **Development and construction** We carry out development and installation projects for photovoltaic facilities, and for components developed by Gransolar Holdings.
- **Operation and maintenance:** We provide maintenance services, and support in the event of any incidents at the photovoltaic plants once construction has been completed.
- **Product development and research:** New products to be manufactured and sold to customers are researched and developed. In addition to ongoing upgrades of current models to make products that better exploit sunlight anywhere and in any situation.

Gransolar has the goal of becoming the leader in the solar energy sector, and a benchmark in the construction of solar trackers and other components, and management of photovoltaic solar facilities. Gransolar also has the aim of providing its customers with value for money through the construction and management of photovoltaic solar facilities, whilst conferring social and environmental value through our commitment to the environment. Gransolar Holdings is committed to supporting the transition towards a sustainable energy system, through continuous innovation to offer the necessary technological solutions and to address the energy challenges of the future, whilst being a reference in the photovoltaic solar panel and solar energy market. Likewise, we develop and promote our corporate values which define the culture of Gransolar at international level by:

- Adapting to our customers' expectations and needs and those of our other stakeholders, providing a complete, professional, personalized service.
- Being committed to effectiveness and continuing improvement in all the company's processes and management systems.
- Transparency and cooperation with subcontractors, suppliers, customers and our social environment.
- Training, motivation and preparation analysis and management, as required by our personnel to ensure full guarantees of the skills that are necessary for each post, for their professional development and training on environmental aspects related to their activities, and the importance of their contributions to the organization's daily activity.
- Respecting the environment and preventing pollution, personal injury and harm to the health of all stakeholders.
- Extending environmental care and prevention of pollution practices to subcontractors during works execution processes.
- Availability of the resources required to permit correct quality and environmental management.
- A strong commitment to Human Rights as the company considers its people to be the backbone of the organization.

- Complying with legal requirements, requirements established by our customers and those that the organization itself subscribes to. Special emphasis is placed on any related to the environment and sustainability.
- Being strongly committed to recycling through a recycling program for each of its companies.
- Implementing a suitable reference framework to establish and review the company's objectives, guaranteeing that the policy is duly documented, implemented, maintained and reported to everybody who works for or on behalf of the company, so that strong trust can be built with customers, entities and official organizations.
- Achieving a working atmosphere leading to personal satisfaction of all our personnel.
- A risk measurement and control-based approach.

Gransolar's main customers are energy producing companies, plant constructors, and to a lesser degree, buyers of electrical energy. Gransolar is present in all markets, which are becoming increasingly more competitive through the arrival of new companies attracted by stable returns over time.

At company level, Gransolar Holdings has identified a number of risks, as described in section 3 of the Management Report.

At project level, risk assessments are conducted, leading to Country Risk Reports. The main risks that have been assessed are those listed as follows:

- Tax
- Human Resources
- Geopolitical
- Cultural
- Legal
- Environmental

Gransolar Holdings, S.L. (formerly, Global Aduar, S.L.) bought 100% of the company shares of Grupo Gransolar, S.L. on April 19 2022 to become the Group's new parent company. Given that the company Gransolar Holdings, S.L. (formerly Global Aduar, S.L.) had no activity prior to the aforementioned date on which the Group was incorporated when the shares of Grupo Gransolar, S.L. were acquired, the indicators contained in this report have been calculated from the date of incorporation of the Group and, therefore, do not present comparative information.

3. Information about environmental matters

Gransolar's business activity comprises the construction of photovoltaic solar farms, the necessary infrastructure to obtain solar power and the manufacture of components for this purpose. The company's business model is based on solutions that enable sustainable development. The construction and manufacturing processes release CO₂ into the atmosphere, which is fully neutralized as of the third year of operation of the plant. Through different measures, Gransolar Holdings contributes to minimizing its impact on the environment, and complies with local legislation in all the countries where it operates. Furthermore, the Company guarantees reliable, quality work, without neglecting the prevention of pollution, optimization of resources and energy efficiency. The low impact of construction is set off over a short period of time after the plants start to produce power. Gransolar Holdings is aware that society demands increasingly high standards of living, and therefore the conservation and preservation of the valuable multiple natural resources on our planet.

Gransolar implements a Quality and Environmental Policy that encompasses all the Company's environmental prevention activities. This policy is sent to all third parties with whom Gransolar Holdings works in order to ensure that they are aware of it and to inform suppliers, contractors and customers about the policy. It is also posted on the websites of the different companies comprising the Holdings. Gransolar is certified in accordance with the ISO 9001 and 14001 standards at its main sites, and implements an environmental management system covering the following Company sites: the building in Parque Empresarial Omega in Alcobendas (Madrid); the Pitágoras building in Almería; and the factories in Cheste and Chiva in Valencia.

We were also certified in accordance with the ISO 20400 standard in 2022, which defines sustainable procurement, focusing on ensuring environmental, social and economic impacts are as positive as possible.

Furthermore, Gransolar implements an internal Code of Conduct and a Code of Conduct for Suppliers, which both establish our environmental commitments as priority goals within the scope of Corporate Social Responsibility, and we expect all the stakeholders related to Gransolar Holdings companies to form a part of this:

- Commitment to protect and conserve the environment.
- Commitment to prevent pollution.
- Commitment to abide by legislation applicable to the activities in question.
- Application of the "3Rs" rule: reduce, recycle and reuse.
- Rational utilization of resources.
- Cooperation with the authorities and organizations in the development of provisions designed to protect the environment.
- Environmental risk assessment regarding all activities.
- Implementation of environmental improvement programs.

Gransolar Holdings has conducted a risk assessment on its environmental management system (legal, regulatory, commercial, logistics, etc. risks associated with establishing in other countries), bearing in mind external and internal factors concerning the organization's context, the needs and expectations of its stakeholders, and other environmental questions, aspects and emergencies related to our activities. This analysis highlights the relevance of specific environmental requirements wherever construction activities agreed with our customers are carried out. The contracts for this type of activities include clauses to secure guarantees that will be applied to prevent environmental risks or the occurrence of them, in fulfilment of the established environmental regulations in the countries where the activity is being undertaken.

From an environmental point of view, Gransolar carries out 3 types of activities:

- **Office Activity:** located in our head offices. Environmental impact is considered to be minimal. The environmental aspects are appropriately managed, e.g.: contracting 100% green electricity, the "0" paper policy and recycling of IT equipment.
- **Factory Activities:** These activities entail a higher environmental impact:
 - Consumption of electricity.
 - Generation of Toxic and Hazardous Waste, which is specifically managed through the services of recycling companies.
- **Plant Activities:** From an environmental point of view, site development and construction are the activities that have a higher environmental impact owing to the nature of construction work, which among other items includes earth works, scrub clearing, opening up roadways and digging trenches over large areas of land. The parties ultimately responsible for consumption and generated waste are the site developers or the owners of the buildings, as applicable, and they are also ultimately responsible for complying with environmental regulations, even though the obligations concerning the items that the site developer should comply with are always transferred to Gransolar in the construction contracts. These activities are carried out nationally, and to a large extent internationally. We do highlight the fact that all our projects include a procedure for obtaining environmental permission before construction begins, and which is closely monitored during the construction stage. Environmental projects are centralized from Spain mainly because of the complexity associated with knowledge of the environmental requirements that are applicable in each country, and the low qualifications of local staff. Nevertheless, we reiterate that the environmental impact is completely set off after three years of construction and operation of the plant.

Considering the current situation, Gransolar has fundamentally focused its strategy on securing projects outside Spain. Considering our international experience, environmental factors in any activities undertaken in developing countries are extremely critical. Therefore, we are committed to raising environmental awareness among our personnel in order to delve further into environmental matters during the development / bidding stage, and also during construction.

Gransolar Holdings assigns different resources to environmental protection. On the one hand, Gransolar hires specific personnel to coordinate the environmental aspects of different actions and projects. This team consists of 30 people who are located at strategic points and who coordinate environmental actions nationally and internationally. On the other hand, different companies specializing in these matters are subcontracted to deal with the environmental specifics of each project and are in charge of the direct action at the sites where Gransolar carries out its activities, always coordinated by the internal team at Gransolar Holdings.

Finally, a specific KPI on recycling has been defined in each of the companies in line with the 2021-2025 Action Plan. It has been called the "Design and distribution of the 365 sustainable recycling procedure" and in 2022 the Energy Storage Solutions Manual/Procedure was prepared, which will be delivered to each customer along with the rest of the documentation.

In our efforts to prevent and reduce emissions into the atmosphere, Gransolar promotes the production of renewable energies through its activity, thus managing to reduce emissions of greenhouse effect gases.

Gransolar implements an environmental management system which is periodically reviewed by the Management. The system assesses different environmental aspects through which monitoring of fulfilment of our environmental goals is carried out, as established for our offices in Madrid, Almeria, the factories in Valencia, Saudi Arabia and operations and maintenance at our photovoltaic solar farms.

We do not consider our activity to be significant in terms of noise or light pollution since our photovoltaic solar farms are located in fairly remote areas, the factories are in industrial areas and our offices do not have an impact in terms of noise or light pollution. Nevertheless, these items are monitored and so far, there have been no complaints or claims regarding them.

In our fight to prevent and reduce carbon emissions that could seriously affect the environment, Gransolar applied for adhesion to The Climate Pledge, an organization that promotes bringing forward zero CO2 emissions plans by 10 years. Furthermore, Gransolar has set itself the environmental goal of energy optimization for its offices in Madrid, Almeria and also its factories in Valencia, by applying the following measures set forth in our CSR Policy, along with raising awareness among our employees on the environment and energy saving.

Type	Measures
Lighting	Using natural light as much as possible and a rational use of lighting; awareness and sensitization
	Installation of LED lighting
	Light zoning
	Installation of light sensors
	Installation of timer switches
	Installation of presence detectors
Power supply	Renegotiating contracted power

Electrical equipment	Contracting green energy
	Procuring efficient equipment with energy saving modes
	Use of multiple power strips with switches and/or programmable plugs
	Configuring the energy saving mode of equipment and managing consumption

3.1. *Circular economy and prevention and management of waste*

Gransolar Holdings continues implementing an environmental strategy based on the circular economy and responsible waste management (reutilization, recovery and recycling of the waste produced through its activities, both at its offices and its factories or on construction sites), with the purpose of reducing any possible negative impacts its activity could have on the environment. Furthermore, a circular economy has been planned to start in 2022 with E22 and ending with 100% of the Gransolar companies by 2025. This plan consists of recycling procedures for 100% of the products installed at our plants or any of the products sold by Gransolar companies.

In order to manage the waste that it produces, Gransolar implements different operational controls at each of its sites. Among other issues, these controls are related to managing hazardous and non-hazardous waste. Gransolar's Environmental Policy, its Best Environmental Practices Guide, its Environmental Operational Control Procedure, Site Management Procedure at Photovoltaic Facilities and Emergency Plans feature different mitigation and control guides, such as the following:

- Any hazardous waste is not removed from the site/facility unless it is sent to a duly accredited authorized waste management company.
- Mixing hazardous waste with other waste is not permitted, and sorting waste by type is compulsory.
- The waste container and dumping area must be properly indicated.
- Hazardous waste is only allowed to be stored for 6 months at the most, whereas any non-hazardous waste can be stored for a maximum of 2 years.
- In the case of construction related activities, the contractor is responsible for waste management, which is carried out in two ways depending on the type and amount produced:
 - A waste storage area will be properly fitted out and sign-posted, or there will be a separate container for each type of waste.
 - Any large amounts of or bulky waste (soil, building rubble, etc.) will be directly loaded onto trucks for removal by the authorized waste manager and/or hauler.
 - Abandoning, dumping, burning or any other form of uncontrolled elimination of hazardous waste is strictly forbidden.

Gransolar Holdings produced the following hazardous and non-hazardous waste in 2022:

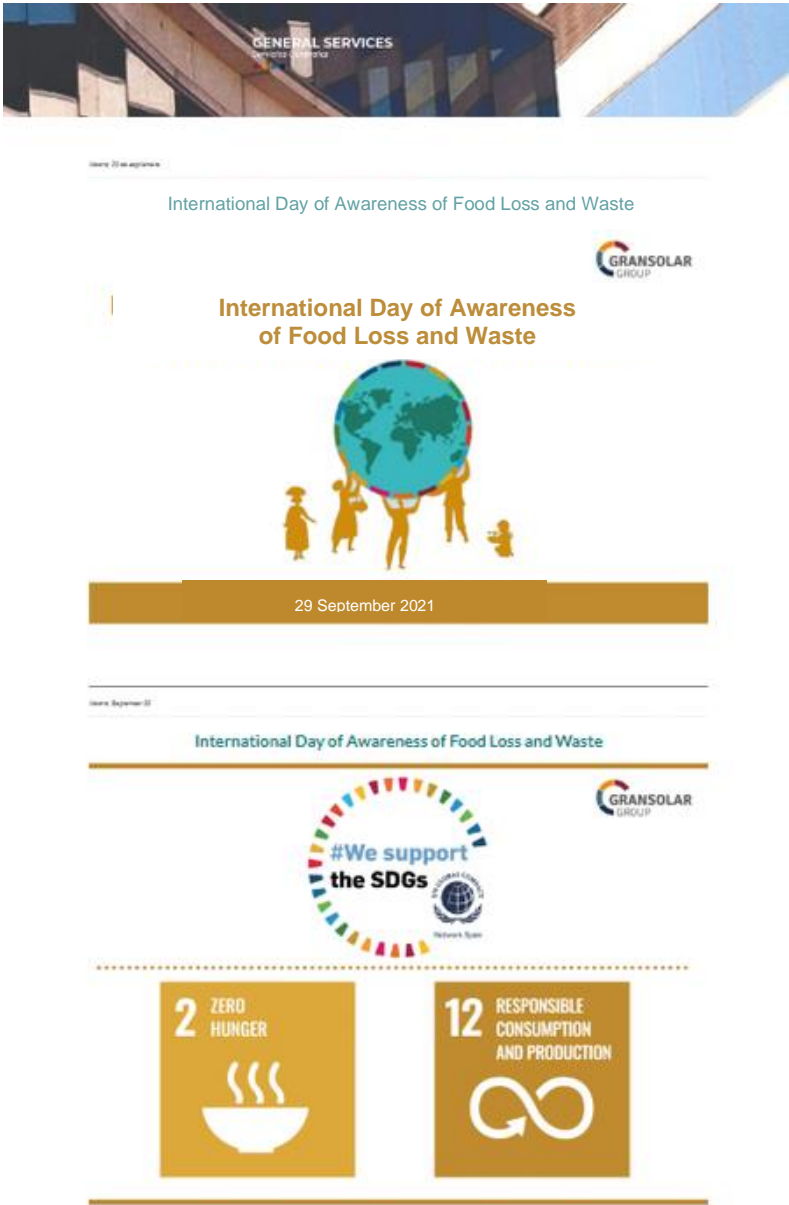
Produced hazardous waste	Quantity	Unit of Measure
Contaminated absorbent material. Mainly contaminated wiping cloths (EWC 150202)	13,725	t
Machining emulsions and solutions free of halogens (EWC 120109)	0,900	t
Mineral-based, non-chlorinated mineral engine oil (EWC 130205)	3.993,5	t
Packaging containing residues of or contaminated by hazardous substances (paint, oil, solvents, etc.) (EWC 150110)	2.028	t
Metallic packaging containing a hazardous solid porous matrix, including empty pressure vessels (EWC 150111)	0,08	t
Mineral-based, non-chlorinated hydraulic engine oil (EWC 130110)	0,004	t
Spent waxes and fats (EWC 120112)	0,600	t
Waste paint and varnish containing organic solvents or other hazardous substances (EWC 080111)	1.380	t
Lead batteries (LER 160601)	1.062	t
Accumulator batteries (EWC 200133)	0	t
Inorganic acid solution waste (EWC 060106)	0,921	t
Chemical waste (EWC 160506)	0	t
Inorganic waste containing hazardous substances (EWC 160303)	0,009	t
Paint, ink and water-based adhesives (EWC 080312)	0	t
Solid resin or adhesives (EWC 080409)	0	t
Mercury-containing batteries (EWC 160603)	0	t
Antifreeze fluids (EWC 160114)	0	t
Photovoltaic modules	0	t

Produced non-hazardous waste	Quantity	Unit of Measure
"Other" waste (EWC 200108)	0	t
Printing toner (EWC 080318)	18	Units
Paper and cardboard packaging (EWC 150101)	51.237	t
Plastic waste	10.515	t
Wood waste	143.806	t
Bulky waste (EWC 200307)	33.413	t
Scrap iron and steel (EWC 170405)	8.561,40	t
Glass (EWC 150107)	0	t
Construction and demolition waste (EWC 170405)	0	t
Mixed metals (EWC 170407)	0	t
Batteries (EWC 160604)	0	t
Mill scale (EWC 100210)	0	t
Discarded equipment (EWC 160214)	0	t

The procedure used to obtain data is through controlling waste collection, checking the delivery notes of managed waste by dates, and also the control and follow-up documents in the case of hazardous waste.

Likewise, Gransolar applies the 3Rs rule whenever possible, in this case reutilizing paper, cardboard and wood waste. This action reduces the amount of non-hazardous waste that we produce.

In addition to the waste listed in the table above, Gransolar promotes different initiatives to combat food waste on sites. Given the fact that most of our sites are away from urban areas, Gransolar allows workers to use any leftover foods and take them home for their personal use. See item 7.4 of this document describing the awareness campaigns carried out by the Group. The campaign on food waste is shown as follows.



3.2. Sustainable utilization of resources

Gransolar is committed to the sustainable use of resources, particularly optimizing the use of water, energy and raw materials.

Gransolar currently uses renewable energy at its facilities.

As far as water is concerned, the main risks for Gransolar are spillages into watercourses. The highest impact is related to construction site activities at our photovoltaic solar plants, although all these construction projects implement an environmental monitoring plan featuring operational controls to minimize the impact in the event of any of these situations arising. Construction of photovoltaic plants requires very little water consumption. This is mainly used for wetting tracks and cleaning the modules.

The details of water and electricity consumption by Gransolar in 2022 are shown in the following table:

Consumption	Volume	Unit of Measure
Water consumption ²	4.382,25	M3
Electricity consumption ³	2.976.896	Kwh

² the reported water consumption data include: the two factories in Cheste and the factory in Chiva, and also the offices in Madrid and Almeria.

³ the reported energy consumption data include: the two factories in Cheste, the factory in Chiva, the factory in Saudi Arabia and also the offices in Madrid, Almeria and Brisbane.

The scope of reference includes our factory in Saudi Arabia and the branch in Brisbane, Australia.

Gransolar seeks to optimize the use of material resources in all stages of its activities. In regard to this matter, the main activity where consumption takes place is in industrial manufacturing, which can be split into two parts: battery manufacturing (factory located in Chiva) and manufacturing of components for solar farms (factories in Cheste and Saudi Arabia).

The figures on the consumption of materials used by Gransolar in its industrial activities at the factories in Cheste, Chiva and Saudi Arabia, where Gransolar carries out its industrial activity, are shown as follows:

Consumption of materials (Cheste)	Volume 2022	Unit of Measure
Metallic elements (steel + aluminium)	121.821,35	t
Plastic	18,876	t
Technological elements (controllers + batteries)	443.640	UN
Batteries	16	M3
Batteries	195	M2
Others	24	t

Consumption of materials (International)	Volume 2022	Unit of Measure
Metallic elements (coils + beams)	7.148,04	UN

The details of material consumption through office activity by Gransolar in 2022 are shown in the following table:

Consumption of materials (Offices)	Volume	Unit of Measure
Paper	0,225	t
Toner	18	UN

3.3. *Climate change*

Gransolar's activity is closely linked to the environment and mitigating climate change, since our main activity is manufacture of key components for the development and construction of photovoltaic solar farms, and therefore reducing the carbon footprint is a challenge that is inherent to our business.

The measures implemented by Gransolar to adapt to the consequences of climate change and the goals of reducing Greenhouse Gas emissions, voluntarily established by the Holdings, therefore include a section on pollution, as discussed previously, and we also carry out different actions which are described in the various Policies published by our Holdings, in particular CSR, with the aim of reducing greenhouse gas emissions, such as:

- The use of electric vehicles to travel between the different factories.
- Our vehicle renting fleet includes hybrid and electric vehicles.
- Gransolar's offices have MyQ printers, which is a system that stores print requests and prints them via a code.
- The car park at our Head Offices has three electric vehicle charging points, and we also have incentives for the purchase and use of electric vehicles. In 2022 we carried out a study to install two quick charging points.
- The Head Offices have been BREEAM certified.
- LED lighting and movement detection lighting activation systems have been fitted in the facility.
- Participants in the UN Global Compact, The Climate Pledge and Forética.
- Contracting green energy at our offices.
- "0" use of paper target.
- Studies for photovoltaic installation for self-consumption at our factories in Chestre.

The Ministry of Ecological Transition and Demographic Challenge has not published the emissions factors for 2022 yet, and therefore the data shown as follows are a rough estimate based on our consumption data for 2022, and applying the 2021 emissions factors published by MITECO. The 2022 estimate stands at 771,02t CO₂eq., bearing in mind the mix of the Spanish electricity grid published by CNMC [National Commission on Markets and Competition] on April 20 2022, i.e.: 259 g CO₂eq/kWh.

3.4. Protection of biodiversity

Gransolar carries out its activities according to each customer's specifications, based on the environmental impact surveys that they conduct. In addition, Gransolar implements its own environmental management system at all the projects it builds, and passes this on to its subcontractors to ensure compliance with environmental requirements.

In the initial stages, Gransolar identifies the project requirements based on different factors: country, contract, legislation and specific environmental permits, surveys, environmental impact statements, etc. When all the requirements have been identified, specific environmental surveillance plans are designed to ensure that they include and take into account all the applicable requirements during construction of the plant. These plans consist of a requirements and good practices guide to be used during project construction. The objective of this is to ensure that all the mandatory environmental requirements are observed throughout the process by Gransolar's own personnel and any subcontractors who take part in the project.

On the one hand, attention is brought to how nearby vegetation can be affected by our activities, and the different policies and procedures defined by the Holdings are observed, in particular Quality and Environment, with the following proposed measures:

- Removal of the topsoil to set it aside for conservation and subsequent use in the areas that are going to be replanted.
- Replanting of land that has been cleared of vegetation immediately after the work, during the most suitable sowing and/or planting season for each variety.
- Establishing good environmental practices in order to minimize any fire risks, such as:
 - Clearing away plant remains and bulky items in order to prevent fire risks.
 - Preventive maintenance of machinery and proper use thereof in order to avoid sparks or flames.

Furthermore, depending on each project, Gransolar establishes wildlife protection and conservation programs including rescue, protection and recovery of habitats for flora and fauna which could be affected by our activities. The following activities are carried out in order to implement these programs:

- We track and identify wildlife before starting any site preparation activities, also during the operation of heavy plant machinery on the site, and afterwards during construction and erection.
- These activities are followed by transport, relocation and release into the wild of any fauna found during the search.

The biggest impact on biodiversity takes place during the construction of photovoltaic solar farms.

Finally, the number of projects under construction and in commissioning increased considerably in 2022, both in Spain and abroad.

As established in applicable requirements (legal and contractual), prior to entering the site, all workers need to undergo induction training, where the applicable Environmental and Health & Safety aspects are specified. The items listed as follows are included in this induction training:

- Rescue of wildlife (flora and fauna)
- Proper waste management
- Good environmental practices

3.5. *Environmental risks*

There is zero possibility of environmental damage or catastrophe caused by direct or indirect action by the Group. Owing to the nature of our activities, both in the field and in our factories, there is no direct risk for the health of our workers or the populations in the areas of influence of our business activity. As for the safety of our employees at their work posts, each post is individually assessed, and specific PPE is provided for each post in line with the activities that our employees perform.

No activities or operations were carried out in protected zones in 2022. There is therefore no impact in these areas or their proximities. Furthermore, Gransolar has a Manual of Good Environmental Practices, which is delivered to all employees in order to increase our level of commitment.

4. Information on social matters and personnel

4.1. *Employment*

Gransolar's workforce is distributed all over the world owing to the large number of international projects we work on. This has a positive impact on the areas of influence of our projects, creating quality employment and helping to further development in those territories. The total number of employees is shown as follows, and their distribution at the year close:

Employees by country	Total 2022
Saudi Arabia	76
Australia	132
Brazil	5
Chile	8
United Arab Emirates	21
United States	14
Spain	835

India	5
Italia	1
Mexico	19
Portugal	6
United Kingdom	1
South Africa	106
Turkey	7
Total	1236

The workforce consisted of 1236 employees at the 2022 year close, of which 295 are women and 940 are men, accounting for 23.9% and 76.1% respectively of all our employees.

The number of employees at the 2022 closure is shown as follows, distributed by gender, age and professional category, and by the type of working week and contract:

Employees by gender	Total
	2022
Male	941
Female	295
TOTAL	1236

Employees by age	Total
	2022
Up to 30 years	299
Between 30-50	790
Over 50	147
TOTAL	1236

Employees by category	Total
	2022
Councillor	1
Executives	29
Technicians/Graduates	470
Administrative staff	228
Skilled workers	179
Labourers	329
TOTAL	1236

Distribution by contract type and working hours	Total
	2022

Permanent	1.055
Temporary	181
TOTAL	1.236
Full time	1.227
Part time	9
TOTAL	1.236

The following table shows the monthly information on additions and departures. The following explanatory notes are required: The table of cancellations includes dismissals, which are later reported on and analysed separately.

Additions	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOT
PVH	3	35	23	25	24	12	23	32	17	194
GRS. Construcción de Proyectos	3	8	11	12	14	26	19	18	13	124
GRS. Operación y Mantenimiento	1	0	3	1	1	2	6	3	0	17
GRS. Desarrollo de Proyectos	0	2	0	0	0	0	0	0	0	2
Gransolar Servicios Compartidos	1	3	4	3	1	3	0	0	0	15
Gransolar Holdings	1	0	0	0	0	0	4	2	4	11
Gransolar Holding	0	0	0	0	0	1	0	0	0	1
ISE	0	3	2	2	1	0	4	2	0	10
E22	0	0	1	0	0	0	0	2	0	3
Deeptrack	1	2	0	1	0	0	0	3	1	14
Total	10	53	44	44	41	44	56	62	35	389

Departures	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOT
PVH	1	11	3	6	4	8	8	8	3	52
GRS. Construcción de Proyectos	3	4	4	7	3	7	11	8	8	55
GRS. Operación y Mantenimiento	0	3	3	0	0	4	1	0	2	13
GRS. Desarrollo de Proyectos	1	0	1	0	1	0	4	0	1	7
Gransolar Servicios Compartidos	1	5	2	1	2	4	0	0	0	15
Gransolar Holdings	0	0	0	0	0	0	4	2	0	6
Gransolar Holding	0	0	0	1	0	1	0	1	0	3
ISE	0	3	1	1	0	1	1	4	2	13
E22	0	0	0	1	0	0	1	0	1	3
Deeptrack	0	1	1	0	0	0	0	0	1	3
Total	6	27	15	17	10	25	30	23	18	170

The data for 2022 show Gransolar's evolution, where we can see that hiring has been uniform throughout the year. Gransolar hired 77% males and 23% females in 2022. Bearing in mind the distribution by age group, we can see that hiring was distributed as follows: <30 years = 30%; 30-50 years = 58%; and >50 years = 12%. If we look at the professional category data, Gransolar increased its number of hires due to needs and increases in manufacturing and sales, in order to meet the demands of the sector. The general trend is for Gransolar to create new jobs and to improve the working conditions through permanent, full-time contracts.

The following tables show the average workforces at Gransolar, itemized by professional category:

Average employees by category	Total
	2022*
Councillor	1
Executives	29
Technicians/Graduates	450
Administrative staff	200
Skilled workers	158
Labourers	287
TOTAL	1.125

(*) The average number of employees considering the business combination detailed as stated in point number 2, Business Model, of this NFR.

As of January 1st, 2022 the number would have been 1.078 employees

The tables showing the averages of total data for Gransolar are provided as follows: Average contracts in 2022 by contract type and working hours distributed by gender, age, and professional category, and by the type of working week and contract:

Average contracts by gender	Distribution by gender	
	Male	Female
	2022	2022
Permanent	732	232
Temporary	121	40
TOTAL	853	272
Full time	850	269
Part time	3	3
TOTAL	853	272

Average contracts by age	Distribution by age		
	Up to 30 years	Between 30-50	Over 50
	2022	2022	2022

Permanent	211	638	115
Temporary	46	92	23
TOTAL	257	730	138
Full time	255	725	138
Part time	2	5	0
TOTAL	257	730	138

Average contracts by professional category	Employees by professional category				
	Executives (*)	Technicians/Graduates	Administrative staff	Skilled workers	Labourers
	2022	2022	2022	2022	2022
Permanent	29	394	168	109	263
Temporary	1	56	32	49	24
TOTAL	30	450	200	158	287
Full time	29	394	198	157	284
Part time	1	56	2	1	3
TOTAL	30	450	200	158	287

(*) In the Executives category we have included the 29 executives as the Councilor

Gransolar maintains stable development, which is reflected in the average number of contracts, from which it can be seen that the average number of workers employed by the company in 2022 has increased. Gransolar has increased permanent, full-time employment.

The number of dismissals in 2022 is shown as follows, distributed by gender, category and age:

Dismissals by gender	Total
	2022
Male	24
Female	14
TOTAL	38

Dismissals by age	Total
	2022
Up to 30 years	7
Between 30-50	25
Over 50	7
TOTAL	38

Dismissals by professional category	Total
	2022
Executives	0
Technicians/Graduates	10

Administrative staff	7
Skilled workers	5
Labourers	16
TOTAL	38

The number of dismissals in 2022 also show they are in line with the most suitable hiring policies and processes for the development of Gransolar's business activity.

Average remuneration by gender	Total €
	2022
Male	€ 43.639
Female	€ 39.719

Average remuneration by age	Total €
	2022
Up to 30 years	€ 31.350
Between 30-50	€ 44.086
Over 50	€ 58.330

Average remuneration by professional category	Total €
	2022
Councillor	*
Executives	€ 186.462
Technicians/Graduates	€ 56.301
Administrative staff	€ 34.884
Skilled workers	€ 36.143
Labourers	€ 56.301

(*) The councillor's remuneration shall be provided together with the average remuneration of the members Board of Directors.

The Board of Directors consists of 8 members, of which 7 are males and 1 is female. The average remuneration of all directors is €209.669, bringing the gap for directors up to 57%.

The remuneration model features two different parts: A set amount considering the level of responsibility, the functions carried out and the career of each employee, the principles of internal equality and the value in the market, which comprises the most significant part of the total remuneration. A variable amount which is associated with the different levels in the company.

This means that approximately 27,6% of all employees are paid this variable amount linked to previously established objectives, which are divided into Company, Department and Personal objectives.

Furthermore, Gransolar's employees have other benefits such as medical insurance, life insurance and a flexible crèche cheque, restaurant tickets, transport tickets and key

personnel have a company car. This has all been defined in what we call the Emotional Salary, which was presented in conjunction with other measures:

- Teleworking.
- Annual medical check-ups.
- Day off work on birthdays if it is on a weekday.
- Training agreements with Business Schools.
- Healthy Life Project.

Gransolar's remuneration policy promotes non-discrimination between men and women, ensuring pay equality. The remuneration model rewards employees for their level of responsibility and their track record, whilst striving to ensure internal equality and external competitiveness. The minimum remuneration (€15,547.08) was 11% over the minimum wage in 2022, as established in Spanish legislation by the Employment Ministry.

The pay gap is shown as follows (measured as the difference in average remuneration between men and women, both nationally and internationally, expressed as a percentage over the average remuneration of men). It is stated by scope and professional category for 2022.

Salary Gap (€)	Salary Women/Men (%)
	2022
Councilor	(*)
Executives	14%
Technicians/Graduates	12,19%
Administrative staff	19,38%
Skilled workers	19,95%
Labourers	22,99%
Company	8,98%

(*) The Councilor's salary gap is shown together with the Board of Directors'

Salary Gap (€)	Salary Women/Men (%)
	2022
National	5,73 %
International	9,48 %
Group	8,98%

We highlight at this point that the difference between national and international is due to expat workers joining the company, the appointment of senior management personnel outside of Spain and the personnel hired in Saudi Arabia. Regarding our expat personnel, they are males with higher salaries because of their expatriation situation, in the categories of Technicians/Graduates and Executives. This is because of the high degree of

specialization required for these categories which cannot be found locally, as is the case of the other positions.

In addition, in line with the principle of Integrity on which Gransolar's commitment to its employees is based, we employ 6 people with disabilities of 33% or over, the same as in the previous year. In 2022 Gransolar contributed to the ASINDOWN Association and the ASALSIDO Association in fulfillment of its commitment to the Disability Law.

4.2. Work organization

Gransolar Holdings is governed by the applicable legal provisions at the sites where it hires workers. Our workers in Spain account for 70% of the total number of employees, where Gransolar is subject to the Spanish legal system.

Our workers in Madrid are governed by the Collective Workers Agreement of the Metal Industry of Madrid, whereas those located at the factories in Valencia and our employees at our offices in Almeria are governed by the Collective Workers Agreements of the Metal Industry of Valencia and Offices in Almeria respectively. All of them work an average of 40 hours a week.

In the case of our workers contracted outside of Spain, the applicable Collective Workers Agreements depend on the countries where they are working. In 2022 in Brazil, the "*Sindicato da Industria de Instalações elétricas, Gás, Hidráulicas e Sanitárias do Estado de São Paulo*" was applied.

Gransolar allows its workers a certain degree of flexibility regarding the times when they start and end their working days. In Madrid and Ingenia in Almeria, our employees are allowed to start work between 8 and 9 o'clock in the morning, whereas on Fridays they work from 8 or 9 o'clock in the morning to 13:30-14:30, to complete their 40 hours. In the months of July and August, they work an unbroken shift of 7 hours. Our factories run three shifts with working weeks of 40 hours, and sometimes four shifts if this is necessary due to production requirements. Site personal work 40-hour weeks.

Gransolar currently implements a flexitime and teleworking system to allow our workers to balance their working and private life.

From a Health & Safety point of view, the Collective Workers Agreements subscribed by Grupo Gransolar's different companies include aspects regarding:

- Compulsory accident prevention training
- Breaches of prevention measures
- Minimum regulations on the prevention of occupational hazards
- Business activity coordination
- Training on the Prevention of Occupational Hazards

Disconnection from work is considered in each of the collective workers agreements applicable to each post and territory, and which are binding for Grupo Gransolar.

4.3. Health & Safety

The health and safety risks concerning Gransolar Holdings are those that are inherent to the industrial production, construction and maintenance of high voltage facilities. Gransolar implements protocols and standards, and it also has a Health & Safety Policy, which are all part of the risk mitigation measures to ensure the health and safety of our employees.

Moreover, Gransolar has been certified in accordance with ISO 14001. The certificates accrediting that the Health and Safety Management systems at the companies comprising Gransolar comply with the provisions of the international standard ISO 45001:2018 were renewed in 2022 and are valid until 2024. Our Health & Safety Management system was subjected to a thorough audit to ensure it complies with the requirements established in the ISO 45001:2018, standard without any non-conforming items being identified during the audit. This rule focuses on Health & Safety at work, with the ultimate goal of improving performance. The main benefits that implementing a certified Health & Safety Management system confer according to OHSAS are:

- To reduce workplace accidents by identifying, assessing and controlling the risks associated with each post, and to avoid the causes leading to workplace accidents and illnesses.
- To comply with legislation on the prevention of workplace accidents, integrating prevention in the organization's processes.
- To promote a culture of accident prevention through the integration of prevention in the company's general system and engagement by all workers.

Gransolar implements a perfectly designed PPE delivery system. The tool for requesting PPE is available on the employees' portal, bearing in mind the variables such as the company, season, region or work post. This is all supervised by the Health & Safety Department and features an approval process by the managers. Among other items, sunscreen, insect repellent and other mandatory site equipment is delivered to our workers.

Insofar as workplace-related illnesses are concerned, none were reported in 2022 or 2021.

The accidents, associated accident and absenteeism rates in 2022 and 2021 are shown in the following table:

	2022
No. of accidents	21
Frequency index ¹	13.27
Severity index ²	0.23
Absenteeism (hours) ³	24.756

1 Calculating the accident frequency index was performed as follows: (No. of accidents*1,000,000/No. of hours worked)

2 Calculating the accident severity index was performed as follows: (No. of hours lost*1,000/No. of hours worked)

3 This calculation includes hours of absenteeism caused by common illnesses, accidents and workplace-related illnesses.

In order to reduce the increasing trend of the accident frequency index (13.27), we have implemented an incentives process for the factory managers. Despite the fact that an increasing trend in accident severity was reported, accident severity still remains a relatively insignificant factor in terms of the types of accidents that were reported in 2022.

4.4. Social Relations

70% of Gransolar's total workforce were covered by a collective workers agreement or trade union in 2022, with these agreements also including clauses on health and safety and other matters. The distribution of the employees covered by collective workers agreements in 2022 is shown in the following table:

Employees by country	Employees at 2022 year close	Employees covered by Collective Workers Agreements	Percentage of employees covered by Collective Workers Agreements
	2022	2022	2022
Saudi Arabia	76	0	0%
Australia	132	0	0%
Brazil	5	5	100%
Chile	8	0	0%
United Arab Emirates	21	0	0%
United States	14	0	0%
Spain	835	835	100%
India	5	0	0%
Italy	1	0	0%
Mexico	19	0	100%
Portugal	6	0	100%
United Kingdom	1	0	0%
South Africa	106	0	0%
Türkiye	7	0	0%
Total	1,236	835	70%

On the other hand, the company does not have a specific approach for participation by stakeholders, such as trade unions or collective negotiation since these items are currently not present in Gransolar.

4.5. Training

Gransolar assigns part of its annual budget to training activities in each of the companies and departments in order to fulfil its training plan in accordance with the Organization's strategy and needs, and the needs of its employees.

The following are the most noteworthy goals of Gransolar's training plan:

- To improve the organization's effectiveness and efficiency through suitable development of our employees.
- To help deal with the changes arising from an evolving environment and the organization's future projects.
- To promote personal development, motivation and enhance the professional competence of our employees.
- To help resolve internal problems.
- To help with the costs of Master's type studies with discounts with different organizations as a part of Gransolar's Emotional Salary.

One of the most noteworthy training programs implemented in 2022 and 2021 is the Extraordinary Leader leadership program. This is a specialized program aimed at improving the effectiveness of our leaders and business results.

The total number of training hours by Gransolar's employees in 2022 amounted to 15,045 hours.

These hours were distributed as follows, broken down by professional category:

Professional category	Training hours
	2022
Executives	485
Technicians/Graduates	8.722
Administrative staff	2.845
Skilled workers	1.389
Labourers	1.633
TOTAL	15.045

Employees by gender	Training hours
	2022
Male	10.446
Female	4.600

Although it is not shown in the table, interns were provided a total of 97 hours training.

Gransolar is running a program known as the Talent School, which consists of 6 month grants to train students in PLC programming, automatization and robotics. Different filters

are applied for the selection process, consisting of reviewing their résumés, interviews held by telephone and dynamics at Gransolar.

On the back of the success of this program, Gransolar decided to continue its strong commitment to Grants, with the aim of ensuring sustained growth of the different departments and to create a pool of young talent in order to continue growing, and through this to commit to training and integrating young people in the job market.

7 interns on university degrees joined our workforce, located in Madrid, Almeria and Valencia, with the idea of them taking on more functions and responsibilities on a daily basis and to eventually end up as employees of the company.

Gransolar currently holds educational cooperation agreements with different universities in the Region of Madrid such as the Polytechnic University of Madrid, the Autonomous University of Madrid, Carlos III University of Madrid, King Juan Carlos University, the Alcalá de Henares University, the Complutense University of Madrid and the Colegio Universitario de Estudios Financieros (CUNEF) (University College of Financial Studies).

Gransolar is committed to young talent and is constantly searching for it. With a view to this, we collaborate with the FP Dual Program. This program consists of one year theory training and another year practical training. The idea is to adapt teachings to the requirements of the job market and socio-economic situation. They annually take part in the Economic-financial, IT, Procurement and Electronic and Software Design departments.

4.6. *Universal accessibility for disabled persons.*

Gransolar believes that accessibility by disabled persons is a basic factor for the layout and distribution of our work posts. Therefore, we take sustainability certifications as the basis to comply with these requirements.

Gransolar's head offices in Madrid (Parque Empresarial Omega, Av. de la Transición Española, 32, Edificio A) is awarded with the BREEAM ES In Use certificate (Building Research Establishment Environmental Assessment Methodology), which consists of a method to assess and verify sustainable construction.

Furthermore, with the start of construction work on our future new ISE building in Almeria, Gransolar started a study and evaluation process to obtain the LEED certificate.

These accreditations assess and certify sustainability applicable to existing, non-residential buildings that are at least two years old. This guarantees a healthy, productive structure for the building's occupants, and efficiency in the use of the resources through a set of tools and procedures that measure, assess and weight the building's sustainability levels from the design stage through to execution and maintenance.

It permits assessing the real performance of the building through information on environmental performance, invoices and other consumption records related to the building. In order to obtain this accreditation, the following items were assessed:

- Management

- Health and Welfare
- Energy
- Transport
- Water
- Materials
- Waste
- Use of land and Ecology
- Pollution and Innovation

On the other hand, Gransolar fosters a position of absolute commitment to promoting and respecting equal opportunities for disabled persons, and counts among their employees a total 6 with different disability. Furthermore, as part of our commitment to the General Law on the Rights of Disabled Persons and their Social Inclusion, in 2022 we hired an office cleaning service for our head offices through a special employment center.

4.7. Equality

Gransolar ensures strict compliance with current legislation, in accordance with the provisions of local laws, and in regard to this matter equality at work is a fundamental pillar.

Today, Gransolar implements an Equality Plan at its company PV Hardware Solutions, which is the only Gransolar Holdings company that this regulation applies to.

This Plan comprises an ordered set of measures which were implemented following a study of the situation with the aim of ensuring equality in terms of treatment and equal opportunities between women and men, and to eliminate all forms of discrimination.

The PVH Equality Plan came about with the following objectives:

- To eliminate any form of discrimination regarding gender, respecting the singularity of all persons and their cultures.
- To modify any conduct based on discriminatory ideology and to establish inclusive language and images in all areas of work.
- To ensure equal opportunities for both genders.
- To prevent any situations of sexual or gender-based harassment.
- To improve personal, family and work balance.
- To ensure the work by our human resources departments remains true to these objectives and remains focused on the search for and progress of the best professionals.

Moreover, as a measure to counter any form of discrimination, Gransolar implements a Code of Conduct that deals with the subject of equality in the treatment of persons and dignity for all forms of diversity.

Distribution of the Group's workforce at the 2022 year closure, was as follows, itemized by professional category and gender:

Professional category	Male (%)	Female (%)
Executives (*)	2,11%	0,24%
Technicians/Graduates	26,58%	11,51%
Administrative staff	11,1%	7,37%
Skilled workers	13,37%	1,13%
Labourers	29,93%	3,65%
TOTAL	76,1%	23,9%

(*) The Executives category includes the 29 executives and the Counsellor

Distribution of the Group's workforce at the 2022 year close, was as follows, itemized by professional category and age group:

Professional category	Up to 30 years	Between 30 and 50 years	Over 50 years
Executives (*)	0%	1,22%	1,13%
Technicians/Graduates	8,91%	25,36%	3,81%
Administrative staff	5,02%	10,53%	2,92%
Skilled workers	4,13%	8,67%	1,7%
Labourers	6,2%	16,77%	3,65%
TOTAL	24,80%	61,99%	13,21%

(*) The Executives category includes the 29 executives and the Counsellor

5. Information on respect for human rights

Gransolar Holdings has defined a CSR Policy that specifically deals with Human Rights. Gransolar has a specific Regulation for this subject, in which, among other matters related to human rights, eliminating bonded or forced labour, a due diligence procedure and a system to prevent any risks concerning these subjects have been defined.

Gransolar also has a Code of Conduct which was reviewed in 2022 and was approved by the Board of Directors last July, which promotes compliance with human and labour rights. We undertake to apply the regulations and good practices regarding employment and health and safety at work.

The aforementioned code specifies the different whistleblowing channels to report any possible cases of violations of human rights. In order to guarantee fulfilment of the code of ethics, Gransolar has an Ethics Committee consisting of:

- The President
- The Human Resources Director
- The Quality Manager

Any communication received through this channel, whether queries or reports, must be sent via any of the following means:

- By ordinary post to the following address: Avenida de la Transición Española 32, Parque E. Omega, Edificio A 28108 (Alcobendas) MADRID, for the attention of the Ethics Committee.
- By e-mail to: comitedeetica@gransolar.com

A new whistleblowing channel was set up in 2022 in order to comply with the obligations pursuant to Directive EU 2019/1937 and Spanish Law 2/2023 on the protection of persons who report breaches of Union Law. All the information on our whistleblowing channel can be found via the following link: <https://gransolar.integrityline.com/frontpage>

Additionally, Gransolar is currently working on a Lessons Learned Plan, through which it will analyse all the Group's conduct with the aim of guaranteeing legal and ethical compliance and the Group's integrity. This plan aims to provide the organization with the tools it needs to be able to act and anticipate possible future conducts that could expose it to financial and reputational risks.

In 2022 there were no confirmed cases of reports on violations of human rights or discrimination following the investigations into possible cases reported through the whistleblowing channel.

On the subject of abolishing child labour, bonded labour or modern forms of slavery, Gransolar is uncompromising. We fully respect the rights of all the organization's workers in all the countries where we operate. This is a commitment that is established in our Code of Conduct, CSR Policy and in our Human Rights Regulations. Furthermore, we are members of the United Nations Global Compact, and we take onboard its directives regarding Human Rights and Business, as the main guiding lines of our conduct.

To ensure these obligations are passed on to our suppliers, in 2022 we approved an update of the Procurement Policy, establishing a new process for approving our suppliers. Pre-approval of suppliers is carried out, consisting of conducting an evaluation of potential suppliers who are able to supply materials and/or services for the company's projects. Approval of these suppliers is limited to those described in the critical supplies procedure.

As part of the pre-approval procedure, suppliers must sign the Code of Conduct in order to continue their progress in the process.

The objective of this Code is to ensure and promote professional, ethical, and responsible conduct by all the Companies' Suppliers during the undertaking of their activities anywhere in the world, in line with ethical business culture established in the Companies. All persons, whether natural persons or legal entities, who directly or indirectly hold labour, economic, social and/or industrial relations with the Supplier shall be treated fairly and in a dignified manner.

In their relations with their employees, all Suppliers must act in accordance with the principles of respect, dignity and fairness, considering the different cultural sensitivities of each individual, and forbidding any form of violence, bullying or abuse at work, non-discrimination in terms of race, religion, age, nationality, gender or any other personal or social condition unrelated to their merits and capabilities. Special attention is brought to labour integration of disabled persons, and those belonging to any ethnic, religious or other minorities.

On the matter of promoting the precepts of the ILO, Gransolar hereby states its commitment to respecting the freedom of association and the right to collective negotiation through applicable collective agreements. Furthermore, the Code of Conduct, CSR Policy and in greater detail in the Human Rights Regulations, reference is made to Gransolar's commitment to combat any form of discrimination, bonded labour and effective abolition of child labour, and all these matters are specifically set forth as standard clauses in the contracts that we sign with our contractors and suppliers.

6. Information on fighting corruption and bribery

Gransolar implements a CSR policy which includes a specific section on Sponsorship and Patronage, and a Regulation on Investment in the Community. In 2022 we completed preparation of the Criminal Compliance Model to combat corruption and bribery among Senior Management. This Model will be presented at the first meeting of the Board of Directors in 2023. It will come into force as of the date it is approved and will be applicable to the entire organization. This Compliance Model consists of the Management System Manual, the Criminal Compliance Model, the Criminal Compliance Policy, the Anti-corruption Policy, the Conflicts of Interest Policy and the Whistleblowing Channel Procedure. As mentioned previously, the Group has a whistleblowing channel that is open to all our stakeholders, through which any suspicions about misconduct can be reported.

Gransolar also has a Code of Conduct with the aim of ensuring compliance with the Group's governance principles, with the ultimate goal of ensuring integrity throughout our organization. This Code of Conduct requires all people who are bound by these regulations to behave in an honest, upright manner, which includes prohibiting workers, contractors or suppliers from delivering any kind of economic benefit to any public employees under any pretext or circumstances.

Another of the measures the Code establishes is that no Gransolar employee may directly or indirectly offer, grant, request or accept gifts, handouts, favours or compensation of any kind to or from any authority or public employee.

Gransolar's Corporate Legal Counsel Department is not aware of any cases related to corruption or bribery concerning authorities, public administrations, political parties and/or representatives, whether such are monetary or in kind, that the organization has carried out either directly or indirectly. Furthermore, no legal proceedings have been filed related to unfair competition and antitrust or to free competition.

7. Commitment to society

7.1. *To sustainable development*

As mentioned previously, Gransolar's vision is to provide its customers with value for money through the construction and management of photovoltaic solar facilities, whilst at the same time contributing value to society and the environment.

In order to achieve this, Gransolar implements a Corporate Social Responsibility Policy with the goal of making further progress in sustainable development, making occasional or regular donations, promoting solidarity however small it may be, and actively contributing to improving society and the environment. Gransolar is committed to fulfilling the 17 sustainable development goals established by World leaders in 2015. These goals are as follows:

1. No poverty
2. Zero hunger
3. Good health and well-being
4. Quality education
5. Gender equality
6. Clean water and sanitation
7. Affordable and clean energy
8. Decent work and economic growth
9. Industry, innovation and infrastructures
10. Reduced inequalities
11. Sustainable cities and communities
12. Responsible consumption and production
13. Climate action
14. Life below water
15. Life on land
16. Peace and justice
17. Partnerships to achieve the goals

Gransolar contributes to 12 of these 17 goals in 2022, and our aim is to continue working on them in the coming years. Proof of this is our ongoing continuation in projects of different types. As proof of our commitment to the United Nations' SDG, we are participating members of the UN Global Compact, which was confirmed through the publication of our Sustainability Report.

For the period assessed in this document, the company contributed with €154.275 to different social projects, monetary donations to foundations and non-profit entities, donations in kind and sports sponsorships.

The following is a list of entities with whom we cooperated in 2022:

Sponsorships:

- ISE Almería Club de Baloncesto Femenino
- Charity runs (Run for the Earth; III Carrera por la discapacidad)
- Torneo Club de Rugby Fuencarral
- Pádel Chulapa Alcobendas
- Para-triathletes sponsorship
- Club de fútbol infantil El Progreso (Spain)
- I Torneo Pádel Grupo Gransolar
- Sotileza Rugby Club (Spain)
- CAU Rugby Club Valencia infantil

Other social action cooperation:

- AUARA (Europe)
- HURTAPLAS (Spain)
- ONG ENVOL VERT (France)
- Cordones Unoentrecienmil (Spain)
- Donation to Fundación Banco de Alimentos (Spain)
- Donación Waqful Waqifi Foundation (South Africa)
- Technology training grants for two young women (India)
- 'Kardoefie' PV Installation for Nelson Mandela Day (South Africa)
- Donation to the Kardoefie (South Africa) school of infant education for reconditioning and installation of solar panels
- Donation to the Asociación Española Contra el Cáncer AECC (Spain)
- Donation to The SeaCleaners (International)
- Donation to the Federación Española de Bancos de Alimentos FESBAL (Spain)

- Christmas campaign donation to children at the "San Agustin" Children's Residence (Spain)
- Financial and furniture donation to the FareShare soup kitchen (Australia)

Finally, Gransolar is committed to preserving the environment through actions such as:

- The use of electric vehicles to travel between the different factories.
- Our vehicle renting fleet includes hybrid vehicles.
- Gransolar has implemented a culture of "0" paper, and also uses MyQ printers, which is a system that stores print requests and prints them via a code. This action has led to continuous savings on paper.
- In line with our "0" paper culture, at Gransolar, we have removed physical files from our offices and we have digitized information and made it available to users.
- The car park at our Head Offices has three electric vehicle charging points, and we also have incentives for the purchase and use of electric vehicles.
- For efficient use of our car park, a draw is held on a daily basis for the places that are not being used by their users, so that employees who have not been assigned a parking place can park there.
- The Head Offices have been fitted with movement detection lighting.

Gransolar was awarded public subsidies in and 2022⁷. As of December 31, 2022, the amount of subsidies received by the company amounted to and €21,850.49 in 2022.

⁷ Any financial contribution paid by a public organization to the company for implementing specific action in the current year is defined as a public subsidy. This does not include any social security allowances awarded for training or other items.

7.2. Awareness and sensitization campaigns

Gransolar not only takes onboard ethical and social commitments at corporate level, including the Sustainable Development Goals and the ESG metrics in our daily activity, but we also want our employees to join us in this through their participation. We have therefore adopted a proactive position of communication through the dissemination of internal awareness and sensitization campaigns. We strive to place our employees as cornerstones in each campaign, since we believe that we will achieve personal fulfilment through different collective objectives.

Healthy lifestyle habits, environmental awareness, participation in social initiatives and reporting on progress in social action are just some of the campaigns we carried out in 2022.

Furthermore, so that all our employees can cooperate directly, in 2022 we kicked off a Corporate Volunteering campaign, in which we help our employees to take part in social actions managed through our CSR Department. This Corporate Volunteering campaign was designed to give a voice to our employees in all Gransolar Holdings so that they can make their concerns and worries known.

Annex 1 shows the details of the different campaigns held in 2022.

7.3. *Subcontracting and suppliers*

Gransolar has internal rules on the corporation's supply of goods, services and works execution. These rules include the requirements that companies who bid in our tenders must meet. Furthermore, in 2022 Gransolar was certified according to the ISO 20400 standard.

Depending on the type of services we contract, Gransolar requires different sets of conditions:

- In the case of suppliers for the development and construction of photovoltaic solar farms, Gransolar requires all significant new suppliers (main suppliers) to sign the "Code of Conduct for Suppliers". The objective of this code is to ensure and promote professional, ethical and responsible conduct by all Gransolar Companies' suppliers during the undertaking of their activities anywhere in the world, in line with the ethical business culture established in Gransolar. Among the commitments entered into by both parties, we highlight the following:
 - Application of the regulations and good practices in terms of employment conditions, workplace health and safety and in their relations with their employees in accordance with the principles of respect, dignity and fairness, considering the different cultural sensitivities of each individual, and not tolerating any form of violence, bullying or abuse at work, or discrimination of any kind.
 - Our commitment to the environment is a priority objective in Gransolar's social responsibility. This code obliges companies to commit to strict compliance with international, national, regional and local legislation, as well as complying with the principles defined by Gransolar.
- When contracting suppliers of parts or raw materials for component development, Gransolar requires the supplier to sign an environmental commitment in which the supplier states compliance with environmental regulations, correct waste management and acceptance of emergency plans or compliance with its own environmental emergency plans. As stated previously, our suppliers are assessed on completion of their work, and this assessment includes environmental matters through certificates.
- For general services contracting, in most cases for the Gransolar Corporate offices, and since the amounts are relatively insignificant, Gransolar considers suitability criteria and not necessarily environmental or social factors. Despite this, Gransolar has also procured goods and services based on social criteria, such as the purchase of water from the company Auara, a social, sustainable bottled water company.
- In order to encourage procurement of local goods, Gransolar cooperates with Amazon Business Prime to give priority to local trade.

- Finally, in regard to the contracting of services, Gransolar implements an internal culture that gives priority to subcontracting local services in the countries where our projects are being carried out, thus promoting local job creation despite the fact that this has not been formalized in a specific procedure. These subcontractors are required to sign a document in which special emphasis is placed on the health and safety of their workers in addition to complying with all environmental regulations. These documents are specific for each country in order to adapt to and comply with applicable local legislation.

In 2022 we assessed and approved the suppliers of our main development and construction equipment, accounting for 80% of our purchases, of which 26 were eventually approved and 3 were rejected. In regard to parts and materials, we assessed and approved suppliers accounting for 80% of the invoiced amount in the previous quarter, of which 22 were approved and 1 was rejected, in line with the criteria established in the Procurement Policy.

7.4. Consumers and clients

Gransolar engages in different businesses and therefore deals with a varied customer portfolio and end users/beneficiaries of the services we provide. In terms of turnover, our most relevant customers are the major private corporations in business to business operations (B2B).

Quality and customer satisfaction are essential matters for all of Gransolar's divisions. Therefore, Gransolar implements different reporting systems in order to respond to applications, queries or standard documented requests. Two different channels can be used depending on the moment when the claim is lodged:

- **If it arises during the project**, both the customer and the Gransolar branch company can file an NCR (Non-Conformity Report), specifying the incident in order to review and resolve it. The Site Manager for the project and Gransolar's site quality manager are responsible for resolving the claim. This is all supervised by Gransolar's quality department.

Any quality-related complaints or claims are managed through the document and quality control mail of the different Gransolar companies. Moreover, Gransolar implements an NCRS Procedure and Improvement Actions that guide consumers on the process on filing claims and standard forms that can be used in the event of the customer not having its own forms.

Claims filed against Gransolar can be for different reasons, and the most appropriate measures are taken depending on the type of claim to ensure a satisfactory response is made as quickly, clearly and effectively as possible. Nevertheless, the most common claims lodged with Gransolar are as follows:

- Shipment clarifications
- Equipment clarifications
- Documentation and site procedures

- Construction details

No voluntary breaches of the currently applicable regulations or codes occurred or were detected in 2022 leading to warnings or penalties.

Furthermore, Gransolar has been implementing an integrated activity improvement initiative known as SPINE, which takes place every 15 days with representatives from all the Gransolar companies. This initiative has the aim of exchanging information about what each business unit is doing on its sites, customer and supplier relations, etc.

	During the construction stage (NCR)	During the Warranty period (WNT)
	2022	2022
No. of registered claims*	17	190
No. of ongoing claims	120	-
No. of closed claims	214	98
Total	351	288

- **If an incident arises after commissioning**, there is a warranty period during which any claims can be filed related to the plant. Gransolar implements a guarantee management procedure, which states that all claims must be accompanied by a warranty notification claim (WNT) through the use of a specific form. The warranty management procedure consists of 3 stages, the notification stage, the execution or rejection stage and the final closure stage.

The person appointed to the project by the Warranty Department is in charge of managing these notices through to resolution.

The received complaints and claims are as follows:

In 2022 an ad hoc tool was developed to manage Non-Conformities. All NCRs are managed at corporate level through this application in a consolidated manner. This includes external and internal NCRs, resulting from our Internal Audits. Implementation and monitoring of the Action Plan (Based on the PDCA cycle) is also carried out through this software to facilitate monitoring of the complete NCR management cycle.

7.5. Tax information

Gransolar's tax information is presented as follows.

	Profits before tax	Corporate income tax (paid)
	2022	2022
Europa	3.635	5.777
USA	1.129	11
LATAM	-1.673	29

Africa & Asia	-4.528	4.269
Australia	21.815	3.941
Total	20.378	14.028

8. Annexes

8.1. *Compilation of communication and awareness campaigns.*

Madrid, 2 December

International Volunteer Day

Charity through volunteering

December 5 is the day the relentless work by volunteers as the driving force for development and common welfare is recognized. At Grupo Gransolar we would like to have a positive impact through our social action and corporate volunteering programs.

We would like to take this opportunity to invite you to visit our section on [CSR on the Intranet](#), where you will find [Aplanet Community](#), our new Volunteering initiatives tool.

It not only provides information, it is also a **cooperation platform** designed for you to suggest ideas and ways of collaborating with organizations and institutions, which will be considered and may become interesting social action and environmental projects.

If you are interested in making suggestions, post it in the suggestions section!

- If you already cooperate with an organization, post it on Aplanet Community!
- If you have a suggestion to make, post it on Aplanet Community!
- If you are concerned about any social interest and/or environmental issue, but you do not have a definite suggestion, post it on Aplanet Community!

Aplanet Community is a living, dynamic tool in constant evolution.

APLANET COMMUNITY



Madrid, 19 October

International Day against Breast Cancer

Grupo Gransolar cares about your health and the health of your environment.

Therefore, to celebrate **International Day against Breast Cancer** we have launched this campaign on information about prevention and early detection.

Find out about early detection and treatment here

You can take part in this campaign too. Take a photo wearing something pink or you ribbon, and tag it as #Gransolar on your social media.



Madrid, 30 November



Disability Week

Mid-life crisis

On 3 December the International Day of Persons with Disabilities is held. This is a special year since it commemorates the 40th anniversary of the first General Law on the Rights of Persons with Disabilities and their social inclusion.

A lot of progress has been made over these 40 years, but a lot still needs to be done, which is why, in conjunction with the Adecco Foundation, Grupo Gransolar implemented in 2022 the “Plan Familia” to continue supporting full inclusion of persons with disabilities in the job market. If you would like to find out more about this project, you can e-mail us at rsc.csr@gransolar.com

Mid-life crisis

Have we achieved full inclusion after 40 years? The answer to this is no. We have not achieved it, and that is why we are going through the #CrisisDeLos40. We've had enough of being thrown out of discos in summer, of our disabilities overshadowing our talent in recruitment processes, of being bullied at school, of being pitied or of us being considered a percentage or a quota. With your help, this mid-life crisis will not last long, because we are not prone to crises, we are prone to action.

And here we are, in our wheelchairs, our 21 pairs of chromosomes, our prosthetic limbs, walking sticks and treatment, but above all, over everything else, we are here with our talent to continue with our revolution.

[Read More](#)

Madrid, 21 December 2022



This Christmas we donated €3,100 to the Food Bank

Good morning!

We would like to thank you for your contributions made during the Christmas lottery purchase.

Through your help, and Grupo Gransolar's commitment, together we managed to raise €3,100 which we donated to the Food Bank.

Thank you for contributing to providing food for the poor and people at risk of social exclusion.

Best regards and have a good day.

Madrid, 29 June

Gransolar contributes its CSR experience to the Forética social impact cluster



Good morning

Gransolar is a member of the [Forética](#) Social Impact Group, business association focusing on driving commitment among businesses in regard to sustainability, human rights and equality.

As a company operating globally, with employees all over the world and customers and suppliers in different countries with different cultures, we believe that Gransolar sharing its experience is very positive at forums of this type, and they are also an opportunity to learn from other companies with similar concerns.

[Further information](#)

Best regards

Madrid, 7 June 2022

WE HOLD THE FIRST GRANSOLAR PADEL TOURNAMENT

Sign up for the first Gransolar Padel Tournament!

As a show of our commitment to sport and the values inherent to doing and playing sport, the CSR Department is organizing the first Gransolar Padel Tournament, which will be held in Almeria, Madrid and Valencia, with a Grand Finale pitting the winners against each other.

The winning couple of the Tournament will be given a gift voucher and Grupo Gransolar will make a donation to an NGO to be decided later on.

In Almeria the tournament will be held on Saturday, 2 July between 17:00 and 20:30, at [Club Elite Pádel Indoor](#).

In Madrid the tournament will be held on Saturday, 2 July between 17:00 and 20:00, at [Club de Tenis y Pádel de Fuencarral](#).

In Valencia the tournament will be held on 2 July between 10:00 and 13:00, at [DREAM PADEL Club](#).

Afterwards, we will hold the awards ceremony and a small snack to the end the day in the best possible way.

Anyone who is interested in taking part, please contact us at rsc.csr@gransolar.com, providing the details of your partner and the site. You have until 14/06 to register.

If you don't have a padel partner, don't worry! E-mail us and tell us your level. We'll find a partner for you.

Best regards

Madrid, May 31, 2022

WE SUPPORT THE EMPLOYABILITY OF DISABLED PERSONS



We help to improve the quality of life of disabled persons!

As an example of our commitment to Society and also to our people, in collaboration with the Adecco Foundation, we kick off the Family Plan. This is a training and intervention project in order to promote the employability and autonomy of disabled persons and their environments.

Through this program, there will be experts on disabilities that will help your relative to improve his/her development, autonomy and inclusion at work.

Anyone who is interested either in joining the program or just for information should please contact us at rsc.csr@gransolar.com. Any information you provide will be treated confidentially.

Best regards

Madrid, 3 June



We celebrate Environment Day

El domingo 5 de junio celebramos el Día Mundial del Medioambiente. 🌱

En **Gransolar** nos unimos a esta celebración porque no sólo colaboramos con las energías sostenibles y los objetivos de cero emisiones, adaptamos **nuestros principios empresariales** al compromiso de dejar un planeta mejor a las futuras generaciones.

Todos nosotros contribuimos con **nuestro trabajo diario** a cuidar el medioambiente y a revertir los efectos del consumo de combustibles fósiles.

On Sunday 5 June we will celebrate World Environment Day. 🌱

At **Gransolar** we join this celebration because we not only collaborate with sustainable energies and zero emissions objectives, but we also adjust **our business principles** to our commitment to leave a better planet for future generations.

All of us **contribute with our daily work** to care for the environment and to reverse the effects of the consumption of fossil fuels.

Congratulations to everyone for your wonderful work and, Happy World Environment Day!



PRESERVACIÓN DE LOS ECOSISTEMAS LOCALES

Desde las primeras fases del diseño y la ingeniería adaptamos las instalaciones fotovoltaicas al entorno, siempre cumpliendo la normativa local y respetando el ecosistema autóctono.

PRESERVATION OF LOCAL ECOSYSTEMS

From the early stages of design and engineering, we adapt the photovoltaic installations to the environment, always complying with local regulations and respecting the local ecosystem.

REDUCING WASTE

We observe a strict waste reduction policy throughout the entire value chain. We manufacture our structures and batteries using recyclable materials to reduce their impact on the environment at the end of their useful life.



WASTE REDUCTION

We follow a strict waste reduction policy throughout the value chain. We manufacture our structures and batteries from recyclable materials to reduce the environmental impact after their useful life.



PREVENCIÓN DEL CALENTAMIENTO GLOBAL

Nuestros seguidores y sistemas de gestión y control optimizan la producción de la energía para sacar el mejor rendimiento a la planta. La Agencia Internacional de la Energía (AIE) certifica que la solar ya es "la electricidad más barata de la historia".

PREVENTION OF GLOBAL WARMING

Our trackers and management and control systems optimise energy production to get the best performance from the plant. The International Energy Agency (IEA) certifies that solar is already "the cheapest electricity in history".

REDUCCIÓN DE LA HUELLA DE CARBONO INDUSTRIAL

Ayudamos a las empresas de los sectores considerados hasta ahora como más contaminantes (minería, industria, transporte, plantas de procesamiento, etc.) a reducir su huella de carbono con un sistema de autoconsumo de energía limpia, eficiente y sostenible.



REDUCTION OF THE INDUSTRIAL CARBON FOOTPRINT

We help companies in the sectors hitherto considered the most polluting (mining, industry, transport, processing plants, etc.) to reduce their carbon footprint with a system of self-consumption of clean, efficient and sustainable energy.



IMPULSO AL DESARROLLO LOCAL

Nuestras instalaciones fotovoltaicas se complementan a la perfección con actividades tradicionales como la agricultura y la ganadería, optimizando la rentabilidad de los terrenos mientras se contribuye con la sostenibilidad.

BOOSTING LOCAL DEVELOPMENT

Our photovoltaic installations complement perfectly with traditional activities such as agriculture and livestock farming, optimizing the profitability of the land while contributing to sustainability.

ESTUDIO DETALLADO DEL IMPACTO AMBIENTAL

Nuestros ingenieros ajustan el diseño de la instalación, ya sea para autoconsumo o conexión a red, a las condiciones específicas de cada terreno para preservar el medio ambiente y colaborar con el desarrollo sostenible.



DETAILED ENVIRONMENTAL IMPACT STUDY

Our engineers adjust the design of the installation, whether for self-consumption or grid connection, to the specific conditions of each site in order to preserve the environment and collaborate with sustainable development.

Madrid, 18 October 2022

World Wildlife Day



Good morning,

Today we are celebrating “World Wildlife Day”!

As part of our commitment to the Agenda 2030 and to achieving the SDG, we continue working towards a more sustainable world in order to protect nature.

We would like to take this opportunity to invite you to visit the section on our Intranet where you will find [Aplanet Community](#), a new Volunteering initiatives tool.

Aplanet not only provides information, but it is also a cooperation platform designed for you to suggest ideas and ways of collaborating with organizations that you know. Your suggestions will be considered and may become interesting social action and environmental projects! If you are interested in making suggestions, post them in the “suggestions” area!

Best regards

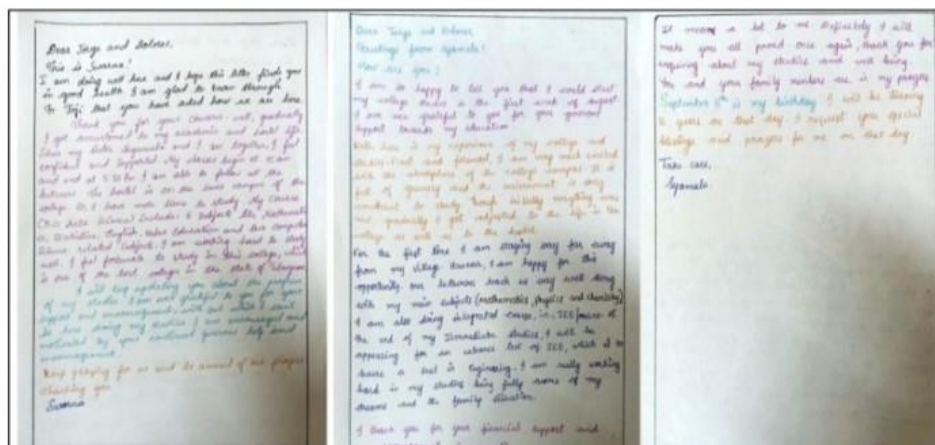
Madrid, 22 September

Swarna and Syamala, beneficiaries of the 22-23 technology training grants for women at Gransolar

Grupo Gransolar has awarded its 2022-2023 technology training grants for women to Swarna and Syamala, two sisters in the Indian state of Telangana. Thanks to this grant, we will provide them both with financial support to complete their studies at Loyola Academy (LA) in Secunderabad.

The aim of this program is to help train young female talent, who would otherwise not be able to take further education at specialized centers.

COMPLETE ARTICLE



8.2. Operational details of the Group companies

Activities by company			
GRS. Construcccion de Proyectos	Construction	Pv Hardware South Africa (Pty) Ltd	Installation
Construcción De Proyectos Pgrs, Lda	Construction	Pv Hardware Turkey Donanim Teçhizat Ticaret Anonim Şirketi	Construction
Gransolar Construction Australia Pty Ltd	Construction	Planchar Hadware Solutions Private Limited	Business development
GRS Construcccion Chile, Spa	Business development	PV Hardware LLC	Installation
Gransolar Desarrollo Y Construcción Mexico, S.A. De C.V.	Construction	Pvh Projetos Renovaveis, Ltda	Installation
Gransolar Construction UK Limited	Construction and Business Development	PV Hardware Solutions S.L.	Manufacturing and Installation
Grs Construction Usa, Llc	Construction and Business Development	Energy Storage Solutions	Installation
Grs Desarrollo Y Construcción Sl Dubai	Construction	GRS. Desarrollo de Proyectos	Business development
Grupo Gransolar Holding Italia, S.R.L	Business development	GRS. O&M	Maintenance
Grupo Gransolar S.L. Sucursal Sudafrica	Construction and Business Development	GRS. Servicios Compartidos	Administration management
Jasper Om (Pty) Ltd	Maintenance	GRS. Holdings	Group Leader and corporate services
Lesedi Om (Pty) Ltd	Maintenance	Grupo Gransolar (Executives)	Group Management
Letsatsi Om (Pty) Ltd	Maintenance	Ingenia Power Solutions	R&D&I
Greenspan II Om (Pty) Ltd		Ingenia Solar Energy	Engineering and self-consumption studies
We would like to inform you that Grupo Gransolar has made a financial			

We would like to inform you that Grupo Gransolar has made a financial contribution to help Ukrainian refugees fleeing from the war against Russia through Educo, an association with experience that supports children in the affected region.

This contribution has been made through the annual budget earmarked for Corporate Social Responsibility (CSR), and also from funds raised through the Christmas tree ball campaign.

If you would like to help the victims of this conflict, you can make donations to Educo (educos@educos.org / Tel.: 900 535 238) or to any other organization working in the region.

**FURTHER
INFORMATION**

8.3. Subjects pursuant to Law 11/2018 on Non-financial and Diversity Reporting: material subjects for Gransolar and reporting criteria

The Board of Directors of Gransolar Holdings, S.L. on March 28, 2023, and in compliance with the requirements established in article 253 of the Capital Companies Law and article 44 of the Commercial Code, regarding the information required in Law 11/2018, of 28 of December, which modifies the Commercial Code, the consolidated text of the Capital Companies Law approved by Royal Legislative Decree 1/2010, of July 2, and Law 22/2015, of July 20, of Audit of Accounts, in matters of non-financial information and diversity, proceeds to formulate the Report of the state of non-financial information integrated between the dates April 19, 2022, to December 31, 2022, which is constituted by the attached document that precedes this writing.

The aforementioned Non-Financial Information Statement Report of 62 pages, pages from 1 to 62 is signed below by the Board of Directors of Gransolar Holdings, S.L., and endorsed by the deputy secretary of the board on all its pages.

Inversiones Silvestrand, S.L. (Presidente) Mr. Domingo Florián Vegas Fernández	Inversiones Frontyard, S.L. Mr. Juan Pedro Alonso Salmerón
Mr. Iván Ernesto Higuera Rivas (Consejero Delegado)	Girasol Investments, SA Mr. Javier Fernando Olascoaga Palacio
Mr. Andrew Stephen Barrett	Mr. Derek Wayne Glanvill
Mr. Víctor García Reymundo	Ms. Blanca Losada Martín

Content of the Non-financial Information Statement

Content of Law 11/2018 NFI			Standard employed	Report section
Business Model	Description of Gransolar's business model	A brief description of the Gransolar business model, which will include its business environment, organization and structure, the markets where it operates, its objectives and strategies, and the main factors and trends that could affect future evolution of the company.	GRI 102-2	Section 2
			GRI 102-4	
			GRI 102-6	
			GRI 102-15	
			GRI 102-7	
Business Model	Policies	Policies applied by Gransolar, including the due diligence procedures applied when identifying, assessing, preventing and mitigating any significant risks and impacts, and verification and control, and also the implemented measures.	GRI 103	Sections 3, 4, 5, 6 and 7
	Main risks	The main risks related to matters linked to Gransolar's activities, including, whenever pertinent and proportionate, business relations, products or services that could have negative effects on these areas, and how Gransolar manages such risks, explaining the procedures used to detect and assess them in accordance with national, European or international frameworks of reference for each subject. This should include information on the identified impacts, providing detailed itemization of such, in particular the main short, mid and long-term risks.	GRI 102-15	Sections 1, 2, 3 and 7
Information about environmental matters	General	Current and foreseeable effects of the company's activities on the environment and, where applicable, on health and safety.	GRI 103	Introduction to Section 3
		Environmental assessment or certification procedures.		
		Resources assigned to the prevention of environmental risks.		
		Application of the principle of precaution.	GRI 102-11	
		Environmental risk provisions and guarantees.	GRI 103	
	Pollution	Measures to prevent, reduce or repair carbon emissions that seriously affect the environment, bearing in mind any specific atmosphere pollution related to an activity, including noise and light pollution.	GRI 103	Section 3.1

Content of the Non-financial Information Statement

Content of Law 11/2018 NFI			Standard employed	Report section
	Circular economy and prevention and management of waste	Prevention measures, recycling, reutilization and other ways of recovering and eliminating waste. Actions to reduce food waste.	GRI 103 GRI 306-2	Section 3.2
	Sustainable utilization of resources	Water consumption and supply in accordance with local limitations.	GRI 303-5	Section 3.3
		Consumption of raw materials and measures implemented to improve efficiency in the use thereof.	GRI 103 GRI 301-1	
		Energy: Direct and indirect consumption; Measures taken to improve energy efficiency; Use of renewable energy.	GRI 103 GRI 302-1	
	Climate change	Greenhouse gas emissions.	GRI 305-1 GRI 305-2	Section 3.4
		Measures implemented to adapt to the consequences of climate change.	GRI 103	
		Voluntarily established mid and long-term goals to reduce GHG emissions and the resources to achieve this.		
	Protection of biodiversity	Measures taken to preserve or restore biodiversity. Environmental impact. Impacts caused by activities or operations in protected areas.	GRI 103 GRI 304-2 GRI 304-2	Section 3.5 Section 3.6
		Employment	Total number of employees and distribution by gender, age, country and professional category.	GRI 102-8, GRI 405-1
	Total number and distribution of labour contract types.			
	Annual average of permanent, temporary and part time contracts by gender, age and professional category.			

Content of the Non-financial Information Statement

Content of Law 11/2018 NFI			Standard employed	Report section
		Number of dismissals by gender, age and professional category.	GRI 401-1. b	
		Average remuneration and evolution thereof by gender, age and professional category or equivalent value.	GRI 405-2	
		Salary Gap.	GRI 103 GRI 405-2	
		Remuneration of equivalent or mean work posts in society.		
		The mean remuneration of executives and directors, including variable remuneration, allowances, compensation, payment to long-term savings systems and any other payments, by gender.		
		Implementation of disconnection from work measures.	GRI 103	
		Disabled employees.	GRI 405-1. b)	
	Work organization	Work time organization.	GRI 103	Section 4.2
		Number of hours of absenteeism.		Section 4.3
		Measures to facilitate work and private life balance and to encourage shared responsibility by both parents.		Section 4.2
	Health and safety	Health and safety at work conditions.	GRI 103	Section 4.3
		Workplace accidents (frequency and severity), itemized by gender.	GRI 403-9	
		Workplace related illnesses (frequency and severity), itemized by gender.	GRI 403-10	
	Social Relations	Organization of social dialogue, including procedures to inform, consult and negotiate with employees.	GRI 102-43	Section 4.4

Content of the Non-financial Information Statement

Content of Law 11/2018 NFI			Standard employed	Report section
		Percentage of employees covered by collective workers agreements by country.	GRI 102-41	
		Balance of collective agreements, particularly regarding health and safety at work.	GRI 403-8	
	Training	Implemented training policies.	GRI 103	Section 4.5
		Total number of training hours by professional categories.	GRI 404-1	
	Accessibility	Universal accessibility for disabled persons.	GRI 103	Section 4.6
	Equality	Measures implemented to promote equal treatment and opportunities between men and women.	GRI 103	Section 4.7
		Equality Plans		
		Measures implemented to promote employment.		
		Protocols against sexual and gender-based harassment.		
		Integration and universal accessibility for disabled persons.		
		Anti-discrimination policy and diversity management, where applicable.	GRI 103 GRI 406-1 GRI 102-17	
	Human Rights	Application of human rights due diligence procedures.	GRI 103	Section 5
		Prevention of risks of violation of human rights and, where applicable, the measures to mitigate, manage and repair any possible breaches.		
		Reports concerning violations of human rights.	GRI 102-17	

Content of the Non-financial Information Statement

Content of Law 11/2018 NFI			Standard employed	Report section
			GRI 103	
		Promotion and fulfilment of the provisions of the fundamental ILO agreements, related to the right to association and right to collective agreement, elimination of any discrimination in employment and occupation, elimination of bonded or forced labour, effective abolition of child labour.	GRI 103	
	Corruption and Bribery	Measures implemented to prevent corruption and bribery.	GRI 103	Section 6
		Measures to combat money laundering.	GRI 205-3	
		Contributions to foundations and non-profit entities.	GRI 103 GRI 413-1	
	Commitment by the company to sustainable development	Impact of the company's activity on local employment and development.	GRI 103	Section 7.1
		Impact of the company's activity on local populations and territory.		
		Relations with the players in local communities and methods of dialogue with them.	GRI 102-43	
		Association or sponsorship actions.	GRI 102-13	
	Subcontracting and suppliers	Inclusion of social, gender equality and environmental issues in the procurement policy.	GRI 103	Section 7.2
		Consideration of social and environmental responsibilities in relations with suppliers and subcontractors.		
		Systems for supervision, auditing and audit results of these relations.		
	Consumers	Consumer health and safety measures.	GRI 103	Section 7.3

Content of the Non-financial Information Statement

Content of Law 11/2018 NFI			Standard employed	Report section
		System for claims, complaints and resolution thereof.		
	Tax information	Benefits for the country.	GRI 103	Section 7.4
		Tax paid on profits.		
		Public subsidies received.	GRI 201-4	Section 8.1

The Board of Directors of Gransolar Holdings, S.L. on March 28, 2023, and in compliance with the requirements established in article 253 of the Capital Companies Law and article 44 of the Commercial Code, regarding the information required in Law 11/2018, of 28 of December, which modifies the Commercial Code, the consolidated text of the Capital Companies Law approved by Royal Legislative Decree 1/2010, of July 2, and Law 22/2015, of July 20, of Audit of Accounts, in matters of non-financial information and diversity, proceeds to formulate the Report of the state of non-financial information integrated between the dates April 19, 2022, to December 31, 2022, which is constituted by the attached document that precedes this writing.

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