

ANTI-HARASSMENT POLICY

CHAPTER I - INTRODUCTION

Solaria Energía y Medio Ambiente, S.A. (“Solaria” or the “Company”) promotes a healthy, safe and appropriate work environment that is respectful of the dignity of individuals. This anti-harassment policy (“Policy”) underscores the Company’s commitment to compliance with the principles set forth in the corporate code of ethics and, specifically, to rejection of abuse of authority and all types of workplace and sexual harassment.

In this document, Solaria defines workplace, sexual and gender-based harassment and establishes a protocol of investigation and response in the event that any such conduct is observed.

CHAPTER II - PURPOSE

Solaria is committed to the following aspects in order to ensure a harassment-free workplace environment of openness and trust:

- Prohibit all types of harassment and any discriminatory conduct in relation to gender, nationality, race, disability, sexual orientation, age, religion, politics or any other conduct that conflicts with the Company’s values.
- Promote a culture of respect and dignity, providing employees with suitable training, especially those in charge of others, and facilitate awareness of the points of this Policy through available resources.
- Provide the tools needed to report inappropriate conduct, safeguarding the confidentiality of involved parties.
- Carry through corresponding disciplinary actions in the event of violation of this Policy.

CHAPTER III – SCOPE OF APPLICATION

This Policy applies to all Solaria employees.

All male and female employees, including middle and senior management, are required to understand and comply with this Policy. Employees whose conduct or actions deviate from or conflict with the points of this Policy will be subject to the consequences established by current legislation, the Workers' Statute and the applicable labour agreement, without prejudice to other civil or penal liabilities in which the employee may incur.

CHAPTER IV – DEFINING HARASSMENT

WORKPLACE HARASSMENT

Workplace harassment or mobbing is a form of abuse that occurs in the workplace and usually targets the psychological aspects or the spirits of others and is often characterised by persistent, systematic and ongoing bullying of an employee. This kind of abuse may appear in different forms and is sometimes difficult to detect.

Sources of harassment may be superiors, colleagues, subordinates or management.

Workplace harassment involves repeated mean-spirited comments and may also include villainous actions or constant and exaggerated criticism of an employee's performance, physical appearance, gender or race, or any other kind of physical or psychological abuse.

SEXUAL HARASSMENT

Sexual harassment is any action that verbally or physically attacks, pursues or offends in terms, concepts, signals or images of a sexual or lascivious nature or that takes place through indecent exposure or by taking advantage of any circumstance of necessity or disadvantage of the victim, targeting one or more individuals of any gender who have not expressly accepted such actions, the purpose or result of which is to degrade the victim, especially when it creates a climate of intimidation, degradation or offensiveness.

CHAPTER V – INVESTIGATION AND RESPONSE PROCEDURES

FILING A COMPLAINT

The process begins with notification of the Ethics, Compliance and ESG Committee through Solaria's dedicated channel: canalcompliance@solariaenergia.com

The Ethics, Compliance and ESG Committee then submits the notification to Human Resources management.

The complaint may be filed by harassed employees or by any other person who is aware of any conduct that conflicts with this Policy. This channel ensures that reported cases will remain confidential and free of retaliation, provided that the complaints are filed in good faith. The channel may also be used by any employee to convey concerns or suggestions.

INVESTIGATION

Human Resources examines all complaints received and, when a case is accepted, an investigation is launched.

In the course of the investigation, information is gathered and interviews are conducted with the affected parties (the alleged victim, offender and witnesses), when necessary.

RESOLUTION

After investigation, Human Resources submits to the Ethics, Compliance and ESG Committee a report that describes the process, the proven results and its conclusion. The Committee decides on the resolution, which may be:

- Closing of the case due to lack of motive or insufficient evidence.
- Disciplinary proceedings on clear indications of workplace, sexual or gender-based harassment.
- Disciplinary proceedings due to conduct other than harassment that may be malicious, offensive or dishonest.

CHAPTER VI - COMPLIANCE

The Ethics, Compliance and ESG Committee is in charge of preventing undesirable conduct that violates the law or conflicts with this Policy.

The Ethics, Compliance and ESG Committee is responsible for verifying the effective application of this Policy, in addition to promoting awareness of the Policy among all employees, overseeing and ensuring compliance to the greatest possible extent, and applying, when applicable, the corresponding disciplinary measures in accordance with established procedures, current legislation, the Workers' Statute and the applicable labour agreement, without prejudice to other civil or penal liabilities in which the offender may incur.

CHAPTER VII – APPROVAL AND COMING INTO EFFECT

This Policy was submitted by the Ethics, Compliance and ESG Commission to the Board of Directors of Solaria, who approved it at their 28 July 2020 meeting, and it came into effect the day after its approval.