



HUMAN RIGHTS POLICY



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INTRODUCTION

For Solaria Energía y Medio Ambiente, S.A. (hereinafter "Solaria" or the "Company") and its subsidiaries (hereinafter "Solaria Group" or the "Group"), compliance with human and labor rights in its relations with its stakeholders is fundamental.

The purpose of this document (hereinafter "The Human Rights Policy") is to formalize the commitment that the Solaria Group has in relation to human rights established in national and international regulations as well as international reference standards and to develop the principles and values that the Solaria Group applies to the respect of human rights, developing what is established in its Code of Business Ethics as well as in the reference norms and standards.

The Human Rights Policy is conceived as an integral part of the set of rules created by the Company in order to manage risks and minimize violations in the business environment, all of which constitute Solaria's Corporate Rules and Policies, accessible through its website: www.solariaenergia.com.

REGULATORY FRAMEWORK

The Human Rights Policy includes the principles that inspire Solaria's commitment to the protection of human rights, in line with the main international declarations, which are applied by Solaria in all its relations:

- The International Bill of Human Rights, formed by the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and its two protocols and the International Covenant on Economic, Social and Cultural Rights.
- The International Labor Organization's Declaration on Fundamental Principles and Rights at Work and its eight fundamental conventions.
- The International Labor Organization Tripartite Declaration on Multinational Enterprises and Social Policy.
- The United Nations Guiding Principles on Business and Human Rights.
- The National Action Plan on Business and Human Rights.
- The OECD Guidelines for Multinational Enterprises.
- The ten principles of the United Nations Global Compact.
- The Equator Principles.
- Convention on the Rights of the Child and its two protocols.
- The United Nations Principles for Responsible Investment.

It should be noted that Solaria is a member of the United Nations Global Compact, through the Spanish Network, expressing and reinforcing its firm commitment to the Ten Universally Accepted Principles in the areas of human rights, labor standards, environment and anti-corruption, as well as to the adoption of measures in support of the United Nations objectives currently embodied in the Sustainable Development Goals (SDGs) and the 2030 Agenda.

For the protection and respect of nationally and internationally recognized human rights, in addition to strict compliance with applicable current legislation and benchmark standards, Solaria has its Corporate Standards and Policies, among which the following are noteworthy:

- Solaria's Code of Business Ethics.
- Supplier Code.
- Sustainability Policy.
- Equality and Diversity Policy.
- Anti-harassment Policy.
- Environmental respect policy.
- Privacy and personal data protection policy.

SCOPE

The Human Rights Policy applies to the Solaria Group and will bind all its personnel, regardless of their position and function, as well as any other natural and/or legal person linked to the Solaria Group by any relationship, including suppliers, customers or investors and any third party related to Solaria.

ANALYSIS OF RISKS ASSOCIATED WITH HUMAN RIGHTS

Solaria is committed to respecting the human rights of its employees, suppliers, customers, investors and society in general.

Solaria's human rights performance is based on the identification and minimization of risks associated with human rights, through:

- Commitment and awareness, through the implementation of policies, internal plans and training for employees and their suppliers, customers and intermediaries.
- Analysis of risks associated with human rights, based on the probability of occurrence of a damage or violation, distinguishing between low risk, if the probability is remote, medium risk, if there is a probability of occurrence or high risk, if it is detected that there is a high probability of occurrence. The risk analysis includes both the Solaria Group's

own risks and the risks of its suppliers or intermediaries, taking into account the jurisdiction in which they operate and internal management.

- Enabling of communication channels, whistle-blowing and/or complaints.

PRINCIPLES OF ACTION

Solaria is committed to respecting human and labor rights and its actions will be governed, in addition to compliance with applicable legislation, national and international standards of reference, the Code of Business Ethics and other Corporate Rules and Policies, by the following rules and principles of action, which are not limited to, but not limited to, the following.

- **HUMAN RIGHTS IN THE WORKPLACE**

Solaria respects all the labor rights of its employees and people associated to the Group, taking all the measures within its reach to avoid violations, specifically:

- Equal opportunities and non-discrimination: Solaria declares its zero tolerance for discrimination and any practice contrary to the dignity of individuals, promoting equal opportunities in terms of access to employment, training and benefits.

Solaria guarantees that no employee performs work that is incompatible with his or her physical or mental capacity and guarantees non-discrimination in the workplace on the grounds of nationality, race, ethnicity, religion, political affiliation, marital status, social status, age, disability, culture, sex, gender identity, sexual orientation or any other condition.

Solaria has in place the Diversity and Equality Policy, which details the specific commitments acquired in the area of diversity, as well as the Anti-Harassment Policy, the selection and hiring protocol and has specific internal human resources policies and plans.

Solaria periodically measures the data on female representation in the company and the salary gap and establishes annual objectives.

- Freedom of association: Solaria respects the freedom of association and collective bargaining rights of its employees and guarantees that employees who exercise their union rights in a non-violent manner will not be penalized or subjected to harassment or intimidation.

- Forced labor: Solaria declares its zero tolerance for any kind of labor exploitation, forced, compulsory or involuntary labor, any kind of human trafficking or servitude, as well as any threat, deception or abuse of physical integrity, sexual or labor harassment or other forms of intimidation, including verbal abuse. Employees will not be allowed to pay recruitment fees or any other fees for the commission of intermediaries or other fees related to their recruitment.

For its part, Solaria, as a company domiciled in Spain, complies with current labor legislation and, among other measures, signs a labor contract with all its employees. In addition, all employees are covered by the applicable Collective Bargaining Agreement.

- Child labor: Solaria guarantees that none of its employees are under the minimum legal age for employment, in accordance with community and local regulations in each of the jurisdictions in which it operates and, in any case, over sixteen years of age.

For its part, Solaria, as a company domiciled in Spain, complies with current labor legislation and, among other measures, signs a labor contract with all its employees. All employees are also covered by the Collective Bargaining Agreement applicable to the Company.

- Fair remuneration and favorable working conditions: Solaria ensures that the working conditions and environment (including fair and competitive wages, working hours, work-life balance, promotion of a safe and harassment-free working environment, etc.) are consistent with applicable international labor standards, and that it promotes and maintains the highest degree of physical, mental and social well-being of its employees and subcontractors.
- Occupational health and safety: Solaria ensures the safety of its personnel, committing itself to comply with current labor and social security legislation, as well as with the requirements established by the International Labor Organization, being up to date in the remuneration of its personnel and in the payment of all contributions related to Social Security and Occupational Accidents.

Solaria guarantees that its personnel work in safe and healthy working conditions.

For this purpose, Solaria has an Occupational Health and Safety Policy, performs an annual risk assessment of all work positions, carries out internal audits in the work centers to verify that safety measures are complied with, and monitors accident and accident rates.

In addition, in relation to suppliers, Solaria requests all the social and labor documentation of the supplier's personnel that will provide services for the Company, requests the acceptance of Solaria's policies, including the Suppliers' Code of Ethics and

the Occupational Health and Safety Policy, and carries out evaluation questionnaires on social, labor and environmental matters of its suppliers.

- **OTHER HUMAN RIGHTS**

Solaria respects and expresses its commitment to the fulfillment of all human rights included in the civil, political, economic, social or cultural reference standards, complying with the applicable legislation in force and with the reference standards, among others:

- Freedom of expression, conscience, opinion and religion.
- Right to information and participation.
- Right of assembly, demonstration and association.
- Right to health.
- Right to education.
- The right to participate in economic, political and cultural life.
- Right to the use of water and to work in dignified conditions: Solaria guarantees that all people who work for Solaria directly or indirectly, or any person who has to go to a Solaria work center, work in a dignified and safe environment, where the applicable legislation in force is complied with.
- Respect for ethnic minorities and indigenous peoples in the places where it carries out its activities, and encourage an open dialogue that integrates different cultural frameworks.
- Respect for the environment.
- Right to privacy, intimacy and protection of personal data: Solaria guarantees the right to data protection of all individuals who are related to the Group; ensuring respect for the right to honor and privacy in the treatment of the different types of personal data and undertakes to keep the most absolute secrecy regarding the personal data to which it has access, to provide it only to authorized personnel and to observe all the legal provisions contained in the current regulations.

Solaria has a Privacy and Data Protection Policy and requests written consent for the processing of personal data from all individuals with whom Solaria has a relationship.

Any additional questions regarding the processing of personal data should be sent by e-mail to dpdatos@solariaenergia.com.

RELATION WITH INTEREST GROUPS

With regard to the involvement of Solaria's stakeholders in relation to respect for human rights, the following must be taken into account:

- a. Employees: Solaria's personnel must show strict respect for the human rights recognized in the applicable legislation in force, reference standards and Solaria's Corporate Rules and Policies in the development of its activity in all the countries in which it operates, and in particular, they will ensure compliance with the Human Rights Policy and the human rights regulatory framework. All Solaria's professionals are expected to act as a first line of defense of human rights, reporting, through the channels provided for this purpose, any possible impact on human rights or any breach of Solaria's Corporate Policies and Standards.
- b. Suppliers: Solaria Group suppliers must also show strict respect for the human and labor rights recognized in national and international legislation in the development of their activities, as well as in the Universal Declaration of Human Rights of the United Nations, the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work and other reference standards.

For Solaria, its suppliers are a key ally for the fulfillment of the Human Rights Policy. For this reason, Solaria has in force the Suppliers Code, accessible through its web page www.solariaenergia.com, to which all Solaria suppliers adhere and must comply with and which includes, in addition to the content of the Human Rights Policy, the applicable legislation in force and the national and international reference standards.

Solaria requires that its suppliers extend the Supplier Code to their supply chain or subcontractors and demand the same compliance that Solaria requires from its suppliers, who are solely responsible.

DISCLOSURE AND COMPLIANCE

Solaria and its employees, as well as its suppliers, customers and third parties with whom the Group interacts, must be aware of, accept and comply with this Human Rights Policy.

This Policy will be available to all employees of the Solaria Group as well as to all the Company's stakeholders through the corporate website (www.solariaenergia.com).

The Policy will be the object of all communication and training actions required for its knowledge and understanding.

Solaria may carry out as many controls as it deems appropriate to verify compliance with the provisions of the Human Rights Policy.

The Board of Directors of Solaria, through the Ethics, Compliance and ESG Committee, is responsible for approving this Policy, as well as for supervising and periodically evaluating its general integration.

Solaria has established a communication channel, to which both employees and third parties can address, in order to communicate any doubts or suggestions, as well as to denounce unethical or illegal behaviors of which they are aware.

Canalcompliance@solariaenergia.com.

RELEASE AND COMING INTO EFFECT

This document was approved by the Board of Directors of Solaria, at the proposal of the Ethics, Compliance and ESG Committee, on May 13, 2021 and its publication took place the day after its approval.