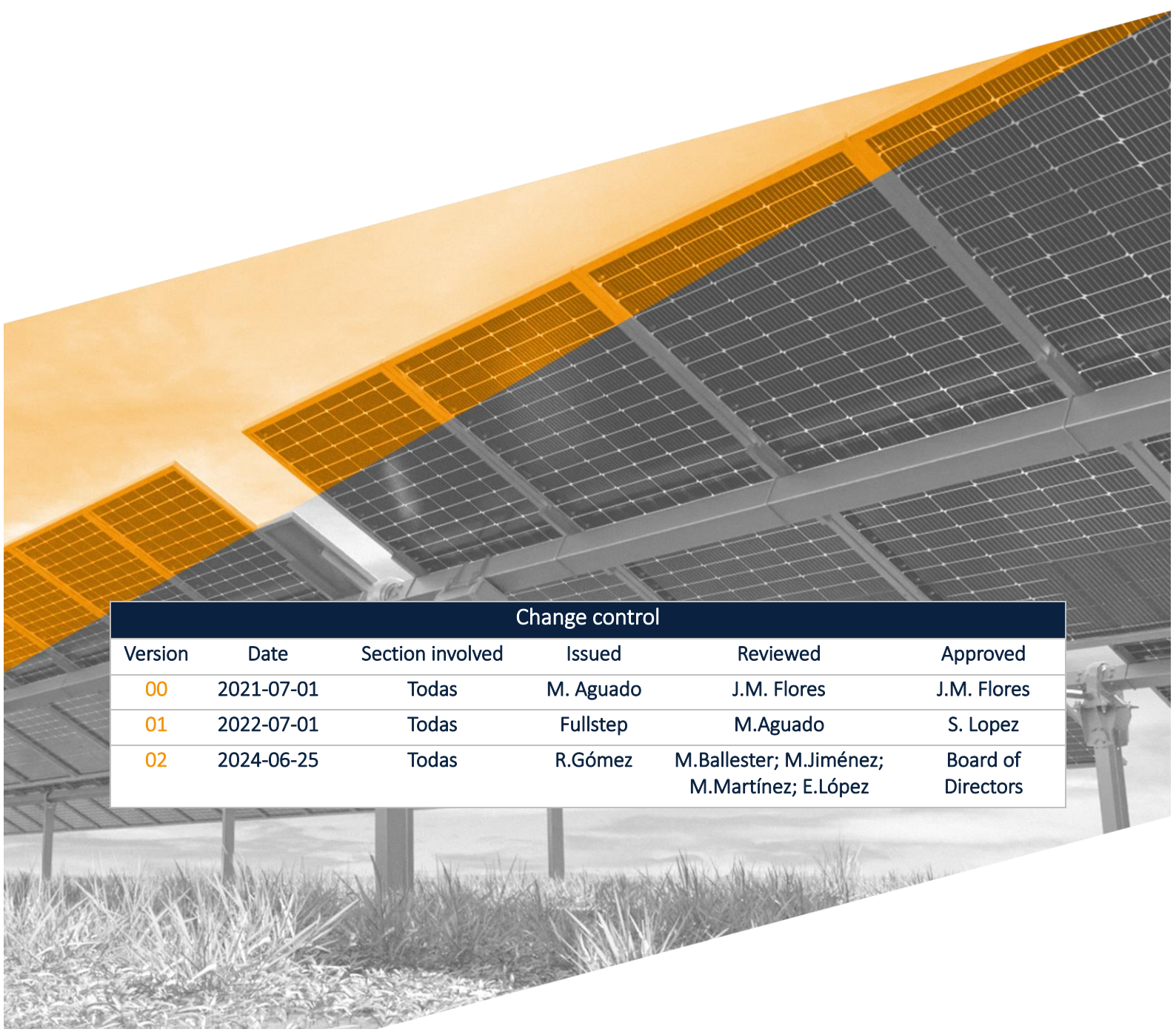




Purchasing Policy

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Change control					
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00	2021-07-01	Todas	M. Aguado	J.M. Flores	J.M. Flores
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1 Purchasing Policy

As a leading company in the photovoltaic market, Soltec has established a purchasing policy that applies to acquisitions made by the Procurement department globally in all its headquarters. This policy is applied from the sourcing phase, the approval and selection of a supplier for an acquisition, as well as its continuous evaluation. Soltec's purchasing policy is based on the fundamental principles of Procurement, on the certifications of continuous improvement and sustainability in purchasing that sustain and align with Soltec's values, support the achievement of its objectives and promote sustainability in its supply chains. supply in accordance with the commercial strategy.

The objective of this policy is to guarantee transparency, equity, efficiency and sustainability in all procurement processes. Therefore, it is presented and approved by the Board of Directors on June 25, 2024.

2 Action principles and objectives of procurement

All procurement activities must comply with applicable laws, regulations and industry standards. Ethical conduct, fairness and integrity will be maintained throughout the procurement process and any conflict of interest must be disclosed and managed as established within Soltec. The parties involved in a purchasing process and, especially, the Procurement staff, will act with professionalism, efficiency, a critical spirit and an attitude of dialogue.

Among others, the aim will be to achieve:

- **Best Value for money** in the purchases made, where the optimal point is sought between the relationship quality, price and delivery time. This allows us to achieve the best price that guarantees the quality of the contracted products and services according to the required technical specifications, adjusting the supply to the deadlines stipulated by the project.
- **Fairness and confidentiality** in the management of purchases towards its suppliers.
- **Transparency** in purchasing management and supplier management processes.
- **Integrity, objectivity and impartiality** of the members of the purchasing team, in order to always obtain the best interest for Soltec.
- **Sustainability** in purchasing, based on the 10 principles of the United Nations Global Compact and developing appropriate actions to increase each year the level of purchasing contribution to the company's strategic SDGs:
 7. Ensure Access to affordable, reliable and sustainable energy.
 8. Promote inclusive and sustainable economic growth, employment and decent work for all.
 9. Build resilient infrastructure and foster innovation.
 13. Take urgent action to combat climate change and its impacts.
 17. Revitalize the global partnership for sustainable development.

2.1 Certifications in continuous improvement and sustainability in purchasing

SOLTEC's purchasing area:

- It is focused on continuous improvement and the search for adding value. Certification in UNE 15896 helps the department identify and develop these best practices.
- Commits to sustainable purchasing processes, which integrates the sustainability criterion in all purchasing decisions, in the approval and selection processes of suppliers, as well as in the supply and service contracts that are awarded. Soltec will ensure that its suppliers reinforce the implicit values of sustainability in their supply and/or service, making this premise the subject of continuous verification. ISO 20400 certification will mark the roadmap with annual milestones for the sustainable development of the supply chain with the objective of achieving the maximum % compliance with the standard in 2030.
- Contributes to the organization's strategic SDGs, applying the appropriate levers to increase that level of contribution each year:
 - Soltec establishes as a requirement for closing a framework supply contract with its suppliers, the protection of fundamental Human Rights involved within its sphere of influence. And it does so through the express commitment of suppliers to comply with the provisions of the United Nations Universal Declaration of Human Rights charter.
 - Soltec is committed to compliance with international labor standards both in relation to its workers and those of its suppliers, in compliance with the ILO Declaration on fundamental principles and rights at work. Likewise, Soltec promotes equal opportunities and non-discrimination in the management of the human team.
 - Innovation as a differentiating and development element that preventively favors the fight for the Environment. With global actions, it promotes greater environmental responsibility both in its internal processes and in those of its suppliers.
 - Through its Corporate Compliance program, Soltec fosters a work culture that values the integrity and ethical conduct of all its workers with respect to suppliers; For this reason, a code of conduct is established with special attention to anti-bribery measures and avoiding possible conflicts of interest.
- Soltec is fully aligned with the spirit of the Directive on Due Diligence of companies in matters of sustainability and develops the tasks of the ISO20400 roadmap to advance regulatory compliance when transposition into Spanish legislation occurs.

3 Purchasing Strategy

The purchasing strategy addresses supply chain risks, improving its resilience and transparency. It is based on the following strategic objectives:

- Purchasing Organization: Establish a formalized process of continuous evaluation of purchases by the internal user areas, define purchasing responsibilities with respect to the internal stakeholders of the organization and development and preparation of a strategic purchasing plan aligned with the purchasing strategy. the organization.
- Suppliers: development of strategic alliances with suppliers and service providers considered core, diversification and internationalization of suppliers and supplies to

guarantee the global quality of the supply chain, development of a vertical integration strategy with suppliers and ESG development of the supply chain.

- Processes: increase the transparency and traceability of contracts, develop the current negotiation process, weightings in the award, consensual decision making and ensure the visibility and control of all information regarding offers and awards; measure the cost of orders, define and implement a supplier development program that has improvement objectives, action plan, specific actions and monitoring of results, establish a purchasing action plan to comply with the strategic purchasing plan and establish satisfaction surveys with suppliers.
- Technology: Implementation of SAP, advance in the implementation of JIRA, implement digital coverage systems for managing requests for offers, comparisons, weightings, formalization of award conditions, which allow transparency, traceability and monitoring of contracts, implement a specific dashboard for purchases.

4 Supplier selection criteria

Soltec has established:

- Criteria and procedures to prequalify suppliers based on their capacity, quality, experience, reputation, financial stability and compliance with applicable regulations and standards.
- Competitive bidding processes requesting quotes from qualified suppliers, ensuring fairness and transparency.
- Evaluation criteria, including price, quality, delivery time, sustainability and supplier performance, to select the most suitable ones to ensure compliance with our standards; especially the reliability, durability, performance and compliance with the specifications of the contracted products and services.
- Supplier evaluation criteria regarding sustainability such as environmental impact, human rights, labor practices, social responsibility and how they transmit their commitment to the entire supply chain. All things being equal, Soltec will prioritize suppliers with the best sustainability evaluation.

Suppliers that do not meet the minimum established in this selection will be excluded from any type of contracting.

5 Quality and sustainability of products and raw materials

Soltec gives preference to products and services that meet our requirements and specifications, are reliable, quality tested with minimal defects or errors, adhere to agreed standards and comply with industry standards and certifications.

In addition, it considers those products and services that are environmentally friendly, energy efficient and have a lower carbon footprint, seeking to minimize the environmental impact of the entire life cycle, from the extraction of raw materials to disposal at the end of the product useful life.

For this reason, Soltec prioritizes the acquisition of raw materials or products manufactured with recycled, recyclable or biodegradable materials and that, to the extent possible, are verified by third parties. In this sense, it encourages its suppliers to obtain their own certifications.

Finally, Soltec pays special attention to the origin of raw materials, carrying out periodic analyzes of their country of origin, ensuring that they do not come from areas relevant to biodiversity.

6 Supply Chain Transparency

Soltec requires suppliers to share information about their supply chain, including the origin of raw materials, manufacturing processes and transportation methods. It also ensures that its suppliers comply with local and international regulations and standards.

Engages with suppliers to promote sustainable practices throughout the supply chain and works collaboratively with them to identify areas for improvement and develop sustainable solutions that benefit both parties.

Ensures that all of its suppliers comply with ethical sourcing practices. This includes fair labor practices, human rights, and avoiding the use of child labor or forced labor.

7 Contract Management

Soltec establishes clear and enforceable contractual terms and conditions that protect your interests and adhere to legal and ethical requirements.

Regularly evaluate supplier performance against key performance indicators (KPIs) agree and take appropriate action to address any deficiencies.

Maintains a strong collaborative relationship with suppliers, including, but not limited to, regular communication, performance reviews and strategic meetings.

It also has a fair and efficient mechanism to resolve disputes with suppliers, encouraging dialogue and mediation whenever possible.

8 Maintenance of records and reports

Soltec ensures transparency, accountability and effective management of activities by maintaining comprehensive records of all Procurement activities, including documentation of supplier selection and evaluation, tenders, contract details and performance reviews.

Monitors performance, identifies opportunities for improvement and supports strategic decision-making by regularly reporting on Procurement activities, including metrics and meeting objectives, to relevant stakeholders.

9 Continuous improvement

Soltec periodically reviews and updates this policy, as well as its purchasing practices, to incorporate best practices, technological advances and the new needs of the organization, both operational and in terms of sustainability. This review is carried out at least annually and whenever necessary for organizational or strategic reasons.

10 Communication and training

Soltec communicates this purchasing policy to its suppliers, employees and interested parties. It also provides training and support to both suppliers and employees to promote understanding and implementation of the collection practices in this policy.

