INFORME DE VERIFICACIÓN INDEPENDIENTE DEL ESTADO DE INFORMACIÓN NO FINANCIERA CONSOLIDADO

A los accionistas de **SOLTEC POWER HOLDING SA (en adelante, SOLTEC)**

En virtud de lo establecido en la Ley 11/2018 de 28 de diciembre (en lo sucesivo, la "**Ley 11/2018**") hemos procedido a la verificación del Estado de la Información no Financiera Consolidado (en lo sucesivo, el "**EInFC**") **SOLTEC** correspondiente al ejercicio cerrado a **2025.**

En nuestra opinión, sobre la base de los procedimientos aplicados y las evidencias obtenidas durante la verificación objeto de este informe, no ha llegado a nuestro conocimiento ninguna cuestión que nos lleve a pensar que la información verificada contenga incorrecciones materiales.

Metodología y equipo verificador

La metodología para la verificación a que se refiere este informe ha consistido en procedimientos de auditoría y mecanismos de verificación de información e indicadores, comúnmente aceptados en el ámbito de actuación de los Organismos de la Evaluación de la Conformidad (según la definición del Reglamento (CE) n.º765/2008), como son las directrices de auditoría contenidas en la norma ISO 19011, y en particular:

- Entrevistas con el personal responsable de la obtención y preparación de los datos
- Revisión por muestreo de documentos y registros (tanto internos como públicos)
- Comprobación por muestreo de la fiabilidad y trazabilidad de los datos
- Evaluación de los sistemas para la obtención, gestión y tratamiento de la información e indicadores

El equipo verificador estuvo formado por personal calificado por SGS International Certification Services Ibérica, S.A.U.

Independencia

Somos independientes de **SOLTEC** de conformidad con los requerimientos de ética, incluidos los de independencia que resultan aplicables a nuestras actividades.

Responsabilidad de los administradores con relación al Estado de la Información no Financiera

De conformidad con lo establecido en el apartado 6 del artículo 44 del Código de Comercio aprobado por Real Decreto de 22 de agosto de 1885 (según redacción dada por la Ley 11/2018) los administradores de la sociedad responden de la veracidad del estado de la información no financiera.

Responsabilidad del verificador independiente

El objetivo de la misión que nos ha sido encomendada se ha limitado a obtener una seguridad limitada de que la información no financiera está libre de incorrecciones de carácter material, debidas a fraude o error y a emitir un informe independiente de verificación de la información incluida en el Estado de Información no Financiera que contiene nuestra opinión.

Firmado: Juan José Fontalba
SGS International Certification Services Ibérica, S.A.U

INDEPENDENT VERIFICATION REPORT OF THE STATE OF CONSOLIDATED NON-FINANCIAL INFORMATION

To the shareholders of **SOLTEC POWER HOLDING SA (hereinafter, SOLTEC)**

Pursuant to the provisions of Law 11/2018 of December 28 (hereinafter, the **"Law 11/2018"),** we have proceeded to verify the Consolidated Non-Financial Information Statement (hereinafter, the **"EInFC") SOLTEC** corresponding to the financial year ending in **2025.**

In our opinion, based on the procedures applied and the evidence obtained during the verification covered by this report, no issue has come to our attention that would lead us to believe that the verified information contains material inaccuracies.

Methodology and verification team

The methodology for the verification referred to in this report has consisted of audit procedures and mechanisms for verifying information and indicators, commonly accepted in the field of action of Conformity Assessment Bodies (according to the definition of Regulation (EC) No. 765/2008), such as the audit guidelines contained in the ISO 19011 standard, and in particular:

- Interviews with the staff responsible for obtaining and preparing the data
- Sampling review of documents and records (both internal and public)
- Verification by sampling of the reliability and traceability of the data
- Evaluation of systems for obtaining, managing and processing information and indicators

The verification team consisted of personnel qualified by SGS International Certification Services Ibérica, SAU

Independence

We are independent of **SOLTEC** in accordance with the ethical requirements, including those of independence, that are applicable to our activities.

Responsibility of administrators in relation to the Statement of Information not Financial

In accordance with the provisions of section 6 of article 44 of the Commercial Code approved by Royal Decree of August 22, 1885 (as worded by Law 11/2018) the directors of the company are responsible for the veracity of the non-financial information.

Responsibility of the independent verifier The objective

of the mission entrusted to us has been limited to obtaining limited assurance that the non-financial information is free from material misstatements, whether due to fraud or error, and to issue an independent report verifying the information included in the Statement of Non-Financial Information containing our opinion.

25/03/2026
Firmado digitalmente por Juan José Fontalba

Signed: Juan José Fontalba SGS
International Certification Services Ibérica, SAU

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NON-FINANCIAL INFORMATION STATEMENT
2025

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INTRODUCTION

Law 11/2018, of December 28, 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, on Auditing of Accounts, in matters of non-financial information and diversity (hereinafter, “Law 11/2018”).

This law replaced Royal Decree-Law 18/2017, of November 24, which had partially transposed into Spanish law Directive 2014/95/EU of the European Parliament and of the Council, relating to the disclosure of non-financial and diversity information.

In accordance with the provisions of Law 11/2018, certain companies, including Soltec Power Holdings, SA (hereinafter, the “Parent Company”), as well as its subsidiaries (hereinafter, “Soltec Power Holdings” or the “Group”), are required to prepare a consolidated non-financial information statement that is included in the management report or presented as a separate report corresponding to the same financial year.

This statement must contain the information necessary to understand the evolution, results and situation of the Group, as well as the impact of its activity in relation to environmental, social, labor issues, respect for human rights, the fight against corruption and bribery, and measures adopted in matters of equality, inclusion of persons with disabilities and universal accessibility.

In this context, the parent company presents the consolidated non-financial information statement within the management report that accompanies the consolidated annual accounts for the year ended December 31, 2025.

This statement has been prepared in accordance with current commercial regulations, following the provisions of Law 11/2018, as well as, where possible, the Sustainability Reporting Global Reporting Standards The Group has selected the Global Innovation Research Initiative (GRI). Furthermore, the Group continues to make progress in aligning itself with the European Sustainability Reporting Standards (ESRS) established by Directive (EU) 2022/2464 (CSRD), which is pending transposition in Spain.

During 2025, the Soltec Group's activity has developed in an environment marked by the execution of the restructuring plan and the strengthening of the Group's asset structure, including the implementation of corporate operations associated with recapitalization and access to instruments to support operations, according to the information communicated to the market.

In preparing this report, the principles of **relevance, materiality, reliability and comparability** established by current legislation and international reference frameworks have been applied.

Note: Operations interrupted

In 2024, the Group adopted a strategy of concentrating on its core industrial activity, which led to the definitive cessation of activities in areas such as EPC and asset management. These business lines have been formally classified as discontinued operations, in accordance with current accounting standards. Although their impact on the non-financial indicators for this year and the previous year has been limited, it should be noted that this situation could affect the future year-on-year comparability of certain indicators included in this Non-Financial Information Statement, as it reflects a different scope of activity than in years prior to 2024.

"During 2025, progress has been made towards a more efficient operating model, supported by reorganization and stabilization measures, with the aim of consolidating operational normality and strengthening competitiveness, building a stronger Soltec aligned with the best ESG practices."

Looking ahead, Soltec will continue to evolve as a company, aiming to strengthen its market perception as a technological, innovative company prepared to meet the challenges of a transforming energy environment. Throughout 2026, this vision will be progressively integrated into its value proposition, corporate positioning, and the way it develops solutions, processes, and distinctive capabilities.

Mariano Berges
CEO of Soltec

1. OUR BUSINESS

1.1 BUSINESS MODEL

During fiscal year 2025, the company implemented a strategic evolution of its business model, consolidating its transformation into a predominantly technology-driven company. This strategic reorientation aims to enhance the scalability of our solutions and optimize the value proposition towards a comprehensive services model, strengthening our competitiveness in the global renewable energy sector . This core business is complemented by the development of photovoltaic projects, conceived as a driver of value creation and pipeline optimization, and by operation and maintenance (O&M) services, which act as a safeguard and preservation of value throughout the asset lifecycle, reinforcing revenue recurrence and long-term customer relationships.

Provider of solar tracking technology solutions as main activity

Soltec's core business model revolves around the manufacture and supply of single-axis solar trackers, an area in which it has a long and successful track record. Since launching its first tracker in 2007, the company has strategically evolved to become a leading provider of comprehensive technological solutions for the photovoltaic sector. This transformation has allowed it to establish itself as a key international player, with a presence in major markets such as the United States, Europe, and Latin America, where its cutting-edge technology has been selected for flagship projects.

Technological innovation is the differentiating factor in Soltec's market position. The company designs and markets solar tracking solutions in 1P and 2P configurations, integrating advanced engineering. to adapt to the technical needs of each site and maximize energy performance in the face of any challenge of solar resource, topography or environmental conditions.

Furthermore, Soltec integrates advanced digital control and optimization capabilities into its technological ecosystem, designed both to maximize the efficiency of radiation capture and to guarantee the operational robustness of the assets. Through intelligent protection algorithms against extreme weather events and wind gusts, our technology reinforces structural safety and operational availability, ensuring the stability of the invested capital throughout its entire life cycle.

As a result of this leadership in engineering and technological development, Soltec validates its value proposition with a superior *track record* to the 20 GW supplied globally. This operational scale consolidates our position as a strategic technology partner, driving the deployment of the global energy transition with precision solutions.

Development of photovoltaic projects as a generator of value

Soltec promotes the development and co-development of photovoltaic projects with a focus on value creation and financial discipline: advancing assets to maturity stages "Ready to Build" (RTB) and, where appropriate, proceed to its rotation through operations with third parties. This approach allows monetizing the project in pre-construction phases, favoring the generation of liquidity and the reduction of exposure to execution risks, while contributing to structuring a commercial pipeline linked to the demand for solar trackers through agreements and synergies with purchasers and industrial partners.

This model facilitates the optimization of cash flow generation and strengthens Soltec's position within the photovoltaic value chain, consolidating its role as a technological and industrial partner for the deployment of new renewable capacity. Based on its market knowledge and presence in key regions, the company identifies opportunities with potential, manages technical and administrative development, and configures transaction schemes that maximize asset value according to the regulatory, grid, and market context.

Furthermore, the development and rotation strategy allows Soltec to align interests with clients and investors, enabling medium and long-term relationships and contributing to sustaining recurring demand for its solar tracking solutions, consistent with the evolution of the business and the needs of the sector.

Operation and Maintenance activities as a value insurer

Operation and maintenance (O&M) activities constitute a high value-added service for Soltec's clients, contributing to preserving the performance and availability of photovoltaic plants throughout their entire lifecycle. Through this offering, the company provides operational monitoring and supervision, preventive and corrective maintenance, and performance analysis, with the aim of optimizing energy production, reducing incidents, and minimizing downtime.

This approach strengthens customer relationships and provides continuity in asset management, ensuring that solar trackers operate within design parameters and at peak efficiency. It also allows for anticipating deviations, planning interventions more efficiently, and contributing to system durability, facilitating its integration into long-term operating strategies by project owners.

1.2 MISSION, VISION AND VALUES

Soltec's corporate purpose is to contribute to a cleaner, more sustainable, and fairer world through energy, in line with the United Nations' 2030 Agenda and Sustainable Development Goals (SDGs). Based on this, the company articulates its identity and way of operating through a mission, vision, and values that guide its strategy, decision-making, and relationships with its stakeholders. These principles are summarized in the following concepts:

Mission

We work every day to offer more reliable and advanced solutions, generating maximum value and satisfaction, always with a transparent, responsible approach and a commitment to people and the environment. The development of this mission is supported by different types of capital, which form our foundation for sustainable growth:

- **Financial capital:**
  - Strengthening of the capital structure following the signing of our restructuring plan.
  - Two distinct business divisions: Industrial and Energy, which optimize the company's efficiency and resilience.
  - Responsible management of resources to ensure the sustainability of the business.
- **Share capital:**
  - We are committed to ecovoltaics in the projects we develop.
  - Integration of social and environmental clauses into contracts with suppliers.
  - Close collaboration with local communities and stakeholders to generate a positive impact.
- **Human capital:**
  - Diverse, multicultural and highly qualified team.
  - Presence of local workers in the projects.
  - Ongoing training in all areas.
  - Focus on end customer satisfaction.
- **Intellectual capital:**
  - Extensive experience and great track record record in the sector
  - Promoting innovation in solutions and processes
  - Collaboration with technology and industrial partners
- **Natural capital:**
  - Sustainable management of materials used in the company's operations
  - Promoting the circular economy and reducing environmental impact

Vision

Soltec's vision is to consolidate itself as an international benchmark in solar energy, recognized for the reliability of its solutions, technical excellence and a commitment to transparency, innovation and people.

We aspire to strengthen the trust of our partners by being a solid, responsible, and consistent partner in every project. Soltec's key stakeholders, which it aims to serve as a benchmark for, are: clients, suppliers, employees, regulators and financial markets, and society as a whole.

Values

At Soltec, our values guide every action and decision.

Honesty, transparency, and reliability are the foundation of our relationships with clients, partners, and collaborators. These values underscore our commitment to sustainability and environmental responsibility, as well as to equality and innovation as drivers of positive change.

We rely on proactivity and loyalty to our mission, fostering strong teamwork and trust that drives the company's development and success.

- **Honesty:** We act with integrity in all our relationships, ensuring that our actions always reflect what we say.
- **Transparency** : We share information clearly and openly, fostering trust with clients, partners, and collaborators.
- **Reliability:** We fulfill our commitments and offer consistent, high-quality solutions, generating security and trust.
- **Teamwork:** We collaborate in a solid and coordinated manner, combining talent and diversity to achieve common goals and generate a positive impact

Contribución a los ODS

Los Objetivos de Desarrollo Sostenible (ODS), aprobados por todos los estados miembros de las Naciones Unidas como parte de la Agenda 2030 para el Desarrollo Sostenible, constituyen un llamamiento universal a la acción para poner fin a la pobreza, proteger el planeta y mejorar las vidas y las perspectivas de las personas en todo el mundo. Soltec, gracias a su modelo de negocio y el sector en el que desarrolla su actividad, contribuye de forma directa a alcanzar los objetivos resaltados en la imagen.

Adicionalmente, la compañía busca contribuir a alcanzar los demás objetivos realizando actividades complementarias de voluntariado y acción social. Estos principios permiten a Soltec avanzar en su estrategia de crecimiento sostenible, alineada con su compromiso de impulsar la energía fotovoltaica como motor del cambio hacia un futuro más limpio y eficiente.

1.3 STAKEHOLDER GROUPS

The following details Soltec's main stakeholder groups, along with their areas of interest and the communication channels used to interact with them:

Table 1Stakeholder groups

Main stakeholder groups		
Stakeholder group	**Main areas of interest**	**Existing communication channels**
Customers	- Development of sustainable products	

soltec

	- Quality control - Value for money - Global position and market share - Corporate social responsibility - Facility security - Contract conditions	- Trade fairs and conferences - Instant messaging - Social networks - Videoconferences - Jira System
Financial market	- Transparent and truthful information - Financial stability and soundness - Efficient resource management - Inclusion of sustainability in the processes - Ethical commitment and regulatory compliance - Sustainability and the environment	- Shareholders' Meeting - Shareholder/investor relations *One- on -one* meetings - Corporate Access - Shareholder website - Webinars - CNMV Communications - Financial publications
Employees	- Clear and transparent communication - Work-life balance - Stability and professional training - Payroll and withholding management - Equality and diversity - Safety and health	- Town halls, formal and informal meetings - Solnews (internal newsletter) - Solpeople - Engage and Jira - Instant messaging - Social networks
Regulator	- Regulatory and legal compliance - Ethics and corporate responsibility - Transparency in information	- Corporate website - Corporate communications
Suppliers	- Joint solution development - Ethical commitment - Contract conditions - Continuity of supply - Homologation processes - Knowledge exchange	- Private and/or public competitions - Trade fairs, congresses and conferences - Payment platform - Visits to facilities - Payment management
Society	- Job creation and social development. - Ethics and sustainability. - Clean energy production. - Volunteering and social impact. - Transparency in communication. - Efficient use of resources.	- Conferences. - Social dialogues. - Media. - Social networks.

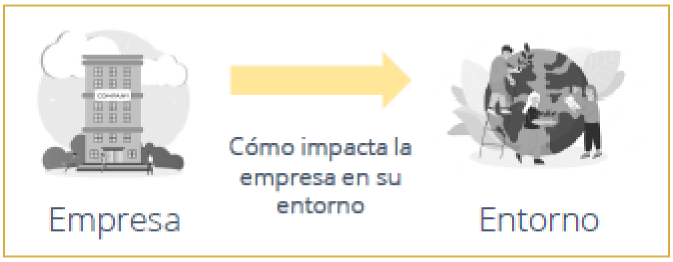
In an environment marked by increased regulatory, social, and market demands, stakeholders require organizations not only to demonstrate consistent economic performance but also to practice responsible, transparent, and sustainable management. Their ability to influence—whether through purchasing decisions, financing, collaboration, regulation, or reputation—can directly impact business continuity and long-term value creation.

In this context, building and maintaining trust with stakeholders is a cornerstone of Soltec Power Holdings' strategy. The company implements regular processes to identify and prioritize the most relevant groups, analyzing both their degree of influence on business activity and the impacts—both positive and potentially adverse—that the company may have on them.

To ensure structured and effective communication, Soltec maintains specific dialogue channels and relationship mechanisms tailored to each group, enabling continuous interaction, understanding of expectations, and the development of appropriate responses. This approach helps strengthen trust and corporate reputation, facilitates the early detection of risks and opportunities, and supports innovation and the development of solutions aligned with market needs and the company's ESG commitments.

1.4 MATERIALITY

In the 2025 fiscal year, Soltec has carried out a dual materiality analysis in compliance with Directive (EU) 2022/2464 (CSRD) and the European Sustainability Reporting Standards (ESRS), applying the documented internal corporate methodology (SP-EHS-0032_es_v00_Metodologia_Doble_Materialidad).



The process has included the following phases: identification of the universe of IROs (Impacts, Risks and Opportunities), technical assessment of impact and financial materiality, integration of stakeholder perceptions and determination of material issues according to predefined thresholds.

Impact identification

Impacts have been identified:

- Real and potential.
- Positives and negatives.
- In own operations and value chain (upstream and downstream).
- In the short, medium and long term.

The identification has been carried out considering the operating model in force in 2025, the internal and external context, the certified management systems, the corporate risk analysis and the list of sustainability issues of AR 16 of ESRS 1, in order to ensure comprehensiveness.

Technical evaluation

In the materiality of impact:

- The actual impacts have been assessed according to their severity (magnitude, scope and irremediability).
- The potential impacts have been assessed considering severity and probability of occurrence.

In financial materiality:

- Risks and opportunities have been assessed according to potential economic magnitude (impact on revenue, OPEX, CAPEX, margins or access to financing), probability of materialization and time horizon.

Homogeneous quantitative scales and objective materiality thresholds defined in the internal methodology have been applied.

Consultation with stakeholders

The process has incorporated structured consultation with relevant stakeholders:

- **Working people:** survey sent to 100% of the staff.
  - Responses received: 174.
- **Customers:** analysis of the 2025 satisfaction survey.
  - Responses received: 5.
- **Suppliers:** use of internal records of homologation and social and contractual evaluation in force in 2025 (no additional specific survey was carried out).
- **Civil society and external agents:** direct consultations carried out with 6 entities (ANSE, Ecologistas en Acción, Columbares , Greenpeace, APPA and regional sector representative).
- **Senior Management and Board:** specific ESG financial assessment questionnaire sent in 2026; the responses received were incorporated into the analysis.

The perceptions obtained were integrated using structured indicators of Stakeholder Perceived Impact (SPI) and Valued Financial Importance (VFI), which complement the internal technical evaluation.

Organizational scope

The analysis covers the actual operating scope for fiscal year 2025, including:

- Design, manufacture and supply of solar trackers.
- Project development up to the Ready to phase Build .
- After-sales and O&M services.
- Associated value chain (suppliers, logistics, customers and operators).

Activities classified as discontinued operations are not part of the main operating scope of the 2025 analysis, except for residual consideration when necessary to ensure consistency and comparability.

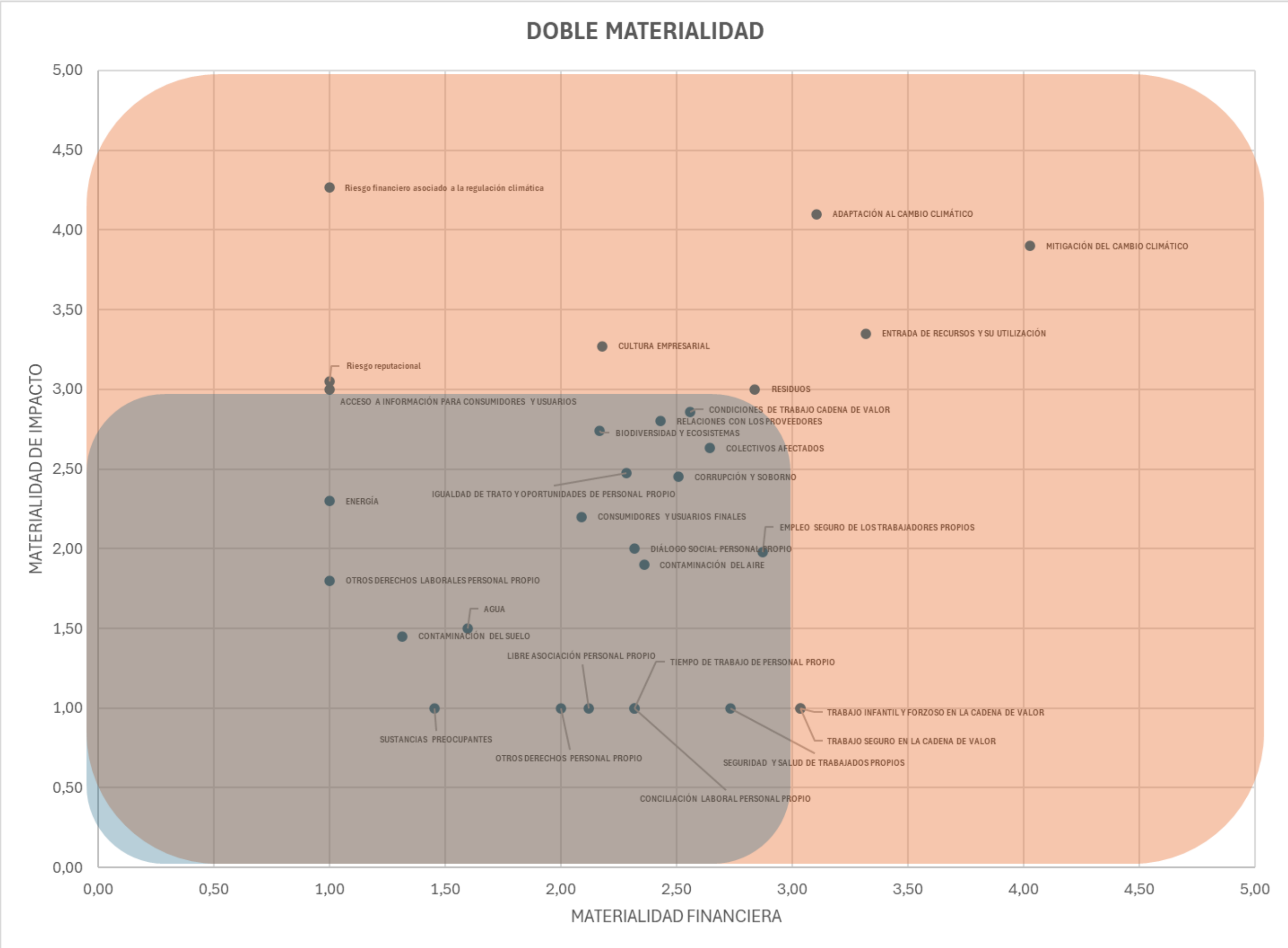
The identified IROs have been grouped into a total of 30 material topics. The IROs have been evaluated on a scale of 1-5. Topics with a score of 3 or higher have been considered material.

Main Relevant Aspects

Material Topic	Materiality Impact	Financial Materiality
Change mitigation climatic	4.03	3.90
Input of resources and their use	3.32	3.35
Adapting to change climatic	3.11	4.10
Child and forced labor in the value chain	3.04	1.00
Safe work in the value chain	3.04	1.00
Secure employment for own workers	2.88	1.98

Material Topic	Materiality Impact	Financial Materiality
Waste	2.84	3.00
Safety and health of own workers	2.74	1.00
Affected groups	2.64	2.63
Working conditions in the value chain	2.56	2.86
Corruption and bribery	2.51	2.45
Supplier relations	2.43	2.80
air pollution	2.36	1.90
Personal work-life balance	2.32	1.00
Working time of own staff	2.32	1.00
Personal social dialogue	2.32	2.00
Equal treatment and opportunities for own staff	2.29	2.48
Corporate culture	2.18	3.27
Biodiversity and ecosystems	2.17	2.74
Free personal association	2.12	1.00
Consumers and end users	2.09	2.20
Other rights of the company's own workers	2.00	1.00
Water	1.60	1.50
Substances of concern	1.46	1.00
Soil pollution	1.32	1.45
Financial risk associated with climate regulation	1.00	4.27
Reputational risk	1.00	3.05
Access to information for consumers and users	1.00	3.00
Energy	1.00	2.30
Other labor rights of own personnel	1.00	1.80

The materiality analysis performed is presented in the following matrix and serves as the basis for structuring this Consolidated Non-Financial Information Statement, ensuring the connection between the most relevant impacts and the sustainability strategy of Soltec Power Holdings.



are highlighted as **material aspects** for Soltec Power Holdings in fiscal year 2025:

- **Climate change mitigation:** Soltec's contribution to decarbonization through the supply of solar trackers and, at the same time, the management and reduction of emissions associated with its operations and supply chain.
- **Resource input and utilization:** management of the intensive use of materials (especially steel) and their efficiency/recyclability, minimizing dependence on raw materials, environmental impacts and exposure to cost volatility.
- **Climate change adaptation:** strengthening the resilience of businesses and projects to extreme events (wind, heat waves, rain) by incorporating design, technology and operation that reduce damage, delays and cost overruns.
- **Child and/or forced labor in the value chain:** prevention, detection and mitigation of the risk of child or forced labor in suppliers and subcontractors, especially at indirect levels and higher risk geographies, through due diligence and control
- **Safe work in the value chain:** guaranteeing adequate health and safety conditions for workers of suppliers and contractors, avoiding accidents, operational interruptions, penalties and reputational risks.
- **Waste :** Minimization and proper management of hazardous and non-hazardous waste generated in manufacturing, logistics and projects, prioritizing prevention, segregation, recovery and regulatory compliance.
- **Corporate culture:** strengthening an ethical and compliance culture (integrity, internal control, whistleblowing channel) that reduces risks of misconduct and increases the trust of employees, customers and investors.
- **Financial risk associated with climate regulation :** business exposure to increased costs and requirements arising from ETS/CBAM and climate regulations (traceability, carbon footprint, logistics), with potential impact on margins and competitiveness

- **Reputational risk:** possible negative impacts on the trust of customers, investors and society due to ESG incidents, due diligence failures or controversies, with direct effects on contracts, financing and brand value.
- **Access to information for consumers and users:** to ensure clear, complete and verifiable technical, contractual and sustainability information for customers and users, reducing risks of claims, penalties and loss of trust.

1.5 BUSINESS AREAS

Soltec Power Holdings has consolidated its business model around the design, supply, and optimization of solar tracking technologies. However, over the years it has complemented its value proposition with a subsidiary for the development of photovoltaic projects, Soltec Desarrollo, and with a division for premium after-sales services and plant O&M, Solmate .

Soltec's activities throughout the photovoltaic project value chain

Manufacturing of solar trackers

The manufacture and supply of solar trackers has historically been the core of Soltec's business. The company designs, develops, and supplies high-efficiency solar tracking technology aimed at maximizing energy capture through the dynamic positioning of photovoltaic modules throughout the day, contributing to improved production and competitiveness of power plants.

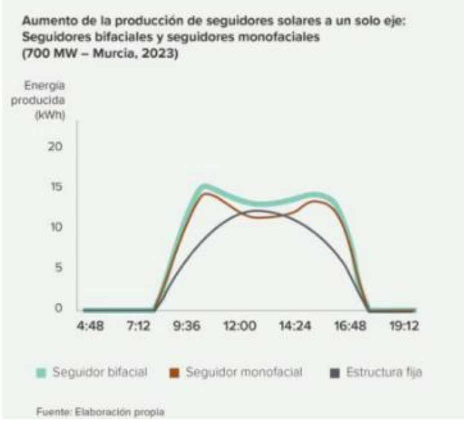
Since launching its first tracker in 2007, Soltec has maintained continuous technological evolution, incorporating design and performance improvements in 1P and 2P solutions, adapted to different project types, terrain conditions, and climate scenarios. It has also integrated advanced control functionalities and optimization algorithms that, in addition to increasing energy efficiency, reinforce operational robustness and structural safety, including protection strategies against wind and weather events, with a direct impact on asset availability.

As an extension of this industrial proposal, Soltec offers support services throughout the entire life cycle of the plant through Solmate , which cover the supply of spare parts, warranty management and technical assistance, as well as preventive and corrective maintenance activities and operation and maintenance (O&M) services, aimed at preserving the performance and useful life of photovoltaic installations.

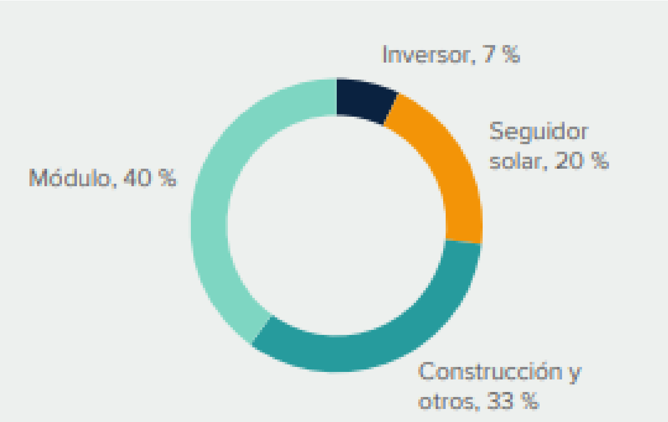
Through this combination of tracker manufacturing and O&M services, Soltec maximizes value creation for its customers, ensuring the long-term reliability and profitability of solar plants.

a) The value proposition of the solar tracker

A solar tracker is a mechanical and control (electromechanical) system that orients photovoltaic modules to maintain a more favorable angle of incidence with respect to the sun's rays, following the sun's path from sunrise to sunset (east-west) in the case of single-axis trackers. In the photovoltaic industry, this technology offers a particularly robust value proposition, as it allows for increased energy production compared to fixed structures—typically by **15% to 25%** , depending on variables such as latitude, solar resource, project configuration, and environmental conditions.



The increase in generation is explained by the fact that the tracking maximizes the capture of radiation throughout the day, extending the effective hours of production and significantly improving the energy contribution in the first and last hours (morning and afternoon), as reflected in the comparative graph.



In relation to the total CapEx of a plant, solar trackers represent on average 20% of the total, as can be seen in the attached graph.

b) Types of solar trackers

Trackers can be differentiated by their design and configuration, which vary mainly between one vertical (1P) and two vertical (2P), referring to the positioning of the photovoltaic modules that the tracker itself has:

- 1P Trackers: A 1P solar tracker is a solar tracker that mounts a panel vertically on the axis of the structure.
- 2P Trackers: A 2P solar tracker is one that mounts two panels vertically on the axis of the structure. Trackers with a 2P configuration can obtain higher performance from bifacial panels.

The choice of solar tracker configuration for a photovoltaic project will depend, among other factors, on the orography, the hardness of the soil and the slopes of the terrain, the wind speed or the country's regulations.

c) Soltec's portfolio of solar trackers

- **SFOne US** : Launched in 2023, this tracker was designed specifically for the US market. Its optimized configuration reduces the number of parts and electronic systems by up to 50%, simplifying installation and lowering costs. Furthermore, it adapts to terrain with slopes of up to 15% and can be manufactured in the USA, reinforcing Soltec's commitment to sustainability and local production.

- **SFOne :** Introduced in 2021, the SFOne is a dual-row tracker with a 1P (one vertical) configuration, designed for large modules (72 to 78 cells). It stands out for its fully wireless system , which allows for complete control with the lowest latency on the market. Furthermore, its optimized design reduces the number of pile drivings by 5% compared to the competition and shortens installation time by 75%.

- **SFOne X:** This single-axis, double-row tracker is the longest in Soltec's portfolio, with a range of up to 125 meters. Thanks to its flexibility, it can adapt to terrain with slopes of up to 15% in the north-south and east-west directions, maximizing land utilization.

- **SF7 USA:** Designed in 2023 for the US market, the SF7 US is a 2P (two vertical) tracker that allows for more efficient installation on uneven terrain and slopes of up to 17%. Its optimized structure reduces the number of piles and parts, speeding up assembly and lowering installation costs.

- **SF7 and SF7 Bifacial:** The SF7 is a 2P tracker that stands out for its adaptability to uneven terrain and its optimized design, which allows for more modules per row, maximizing project density. The bifacial version of the SF7 increases energy production by up to 2.1% compared to a 1P tracker, by harnessing radiation reflected from the ground.

- **4x4 Solution:** This Soltec innovation allows for superior adaptation to any type of terrain, offering operation on constant slopes of up to 15% in north-south and east-west directions, and on non-constant slopes of up to 20%. Its integrated software system optimizes the distribution of trackers on the site, minimizing earthworks and reducing installation time and costs.

Soltec is characterized by being a multi-product and multi-technology supplier of solar trackers in order to offer the customer the most competitive solution adapted to their project:

SFONE (1P)

- Fewer engines
- Fewer electronic components
- Less steel
- Better performance in windy regions
- Less visual impact

SF7 (2P)

- Suitable for steeper slopes and better installation tolerances
- High performance in difficult terrain when drilling is required (fewer pile drives)
- Greater bifacial gain and better cooling
- Wider aisles for the same GCR

Additional services

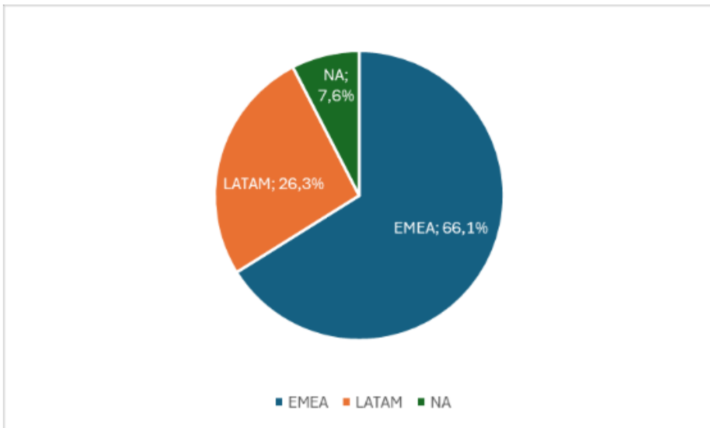
Soltec offers a comprehensive range of services to support its clients in the realization of each project, using a personalized approach tailored to the specific needs of each site and lifecycle phase. This offering includes consulting and support in key areas such as defining optimal orientation and configuration, logistics planning, technical training, commissioning and installation support, as well as operation and maintenance services, with the aim of ensuring efficient execution and reliable, cost-effective long-term performance of the asset.

- **Project engineering:** manufacturer-optimized design to achieve maximum performance in every project.
- **On- site services** : include plant installation guidance, logistics, training, commissioning, installation and operation, and maintenance.
- **Logistics service:** includes the storage and logistics system, which delivers the tracker components to the project location and within the agreed timeframes, without intermediary companies.
- **Commissioning :** Soltec offers the service of commissioning the plant, the proper control of the solar trackers of the project by specialized engineers.
- **Solteach Pro Training :** This is a comprehensive training program for the design and installation of photovoltaic power plants using solar trackers. This professional program is aimed at companies and professionals in the solar industry specializing in the design and installation of solar trackers for large-scale photovoltaic projects.
- **After-sales service (Solmate):** customer service through a platform for the comprehensive management of warranty, care, operation and maintenance of plants.

- **Operation and Maintenance Activities:** Soltec provides continuous monitoring, preventive and corrective maintenance, and performance analysis, optimizing energy production and minimizing facility downtime.

Soltec's main markets in the solar tracker business are structured around three priority regions:

- **Europe (mainly Spain and Italy):** leading markets in southern Europe, with a favorable regulatory base and sustained deployment of new photovoltaic capacity, which continues to generate demand for plant performance monitoring and optimization solutions.
- **United States:** one of the largest and most dynamic photovoltaic markets, with very high installation volumes and an incentive framework that continues to drive investment and activity (including guidelines and developments related to **inflation) . Reduction Act – IRA**).



- **Latin America:** region where Soltec has a track relevant record and recognition, with sustained commercial activity and opportunities linked to renewable growth in key markets.

Innovation in DNA

Soltec constantly drives innovation in the photovoltaic sector, developing advanced solutions such as agrivoltaic systems, which contribute to maximizing energy efficiency and optimizing land use, while responding to the main global challenges in sustainability.

Agrovoltaics: integration of solar energy and agriculture

La agrovoltaica es una innovadora solución que combina la producción de energía solar con actividades agrícolas y ganaderas en el mismo terreno, generando sinergias que benefician a ambos sectores. Sus principales beneficios son:

- Uso eficiente del terreno: permite la coexistencia de cultivos, ganado y paneles solares, optimizando el uso del suelo y ofreciendo una fuente adicional de ingresos.
- Protección de cultivos: los paneles solares brindan sombra parcial, protegiendo los cultivos de condiciones extremas como el calor y reduciendo la evaporación del agua del suelo.
- Biodiversidad y sostenibilidad: fomenta la biodiversidad al crear microclimas favorables para diferentes especies, contribuyendo a prácticas agrícolas sostenibles.

Intelligent **algorithms for** agrivoltaics :

Soltec has developed specific algorithms to optimize the interaction between solar systems and agricultural and livestock activities:

- Machinery: The solar panels can be adjusted to a horizontal position or to a maximum angle (back to back), allowing the passage of agricultural machinery for activities such as tilling, mowing, sowing or harvesting.
- Crops: The trackers adjust to the maximum angle to allow optimal radiation on the crops and adapt the tracking angle according to the crop's growth.
- Livestock: The panels can be configured in a horizontal position or at a restrictive angle to facilitate grazing activities, ensuring the well-being of the livestock.

Solutions like this demonstrate Soltec's commitment to innovation in the photovoltaic sector, integrating advanced technology that improves energy production while supporting agricultural and livestock sustainability.

Development of photovoltaic projects

Soltec also participates in the development of photovoltaic projects, with a focus on structuring and maturing assets to the "Ready to " phase. Build " (RTB). This work includes the identification and selection of opportunities, the processing and obtaining of permits, the performance of technical, environmental, access and connection studies, as well as the financial analysis and the formalization of strategic agreements necessary to ensure the viability and value of the project.

Once the RTB phase is reached, the company proceeds to rotate its assets through sales to third parties or through agreements with clients and partners, which allows:

- Generate liquidity and optimize the financial position, reducing exposure to higher risk execution phases.
- Secure a recurring pipeline of demand for your solar tracking solutions, leveraging commercial and supply synergies.

This model helps maintain a competitive position in the photovoltaic market by combining disciplined development capabilities with Soltec's technological value proposition, strengthening medium- and long-term relationships with customers and investors, and aligning value creation with the needs of the sector.

In this business area, the company focuses on developing projects intended for sale to third parties.

- **Co-development agreements :** These constitute a strategic approach to maximizing the potential of photovoltaic projects. This model allows the parties to share resources, technical capabilities, and risk exposure, fostering more efficient development and ensuring alignment with the partners' commercial and operational objectives.
- **Creating synergies:** Collaboration on photovoltaic projects not only facilitates the progress of the project through its permitting and development, but also generates commercial synergies that strengthen Soltec's value proposition as a technology partner. In practice, these agreements help boost the purchase of solar tracking solutions, supporting the generation of a recurring pipeline of demand.
- **Divestments (asset rotation):** the rotation of projects in the "Ready to " Build " allows you to realize the value of your assets, generate liquidity, and optimize the return on invested capital during development. This approach strengthens financial discipline and provides the capacity to reinvest in new opportunities, maintaining a balance between growth and risk management.

Within this framework, project development activity focuses on the evolution of assets from their inception (greenfield) to their maturity for construction (ready-to-build). The objective is to rotate assets—fully or partially—at different stages of the process, either during development itself or once the RTB (Ready-to-Build) status has been reached, depending on market conditions and corporate strategy.

Solmate , plant life cycle

after-sales services , plant operation, and maintenance will take center stage. This is driven by the progressive aging of the plant fleet in Soltec's traditional markets and by operators' interest in maintaining them in optimal condition in an electricity market with tight profitability.

On the one hand, Solmate will strengthen its service offering to Soltec's customers with older plants by providing preventative maintenance, retrofits of electronics and other components, as well as algorithm updates. In this regard, it's worth noting that Soltec is the leading European tracker and the third largest in the world in terms of power supplied to plants 10 years old or older.

For its part, the Operation and Maintenance (O&M) division Solmate Care represents an important asset for the company, as it has accumulated more than 15 years of experience in plant management, ensuring the optimal performance not only of the trackers , but of the entire plant throughout its useful life.

The objective of these customer support services throughout the lifespan of their plants is to maximize efficiency, extend the durability of equipment and ultimately contribute to ensuring a return on investment.

2. CORPORATE SUSTAINABILITY, ETHICS AND RISK MANAGEMENT

2.1 CORPORATE GOVERNANCE

Soltec Power Holdings maintains a corporate governance model aligned with best practices, which is fundamental to ensuring transparency and strengthening the confidence of investors and other stakeholders.

During 2025, strengthening corporate governance has been a key element in managing Soltec's restructuring and transformation process, reinforcing the mechanisms of supervision, control and transparency to the market.

At the close of fiscal year 2025, the **Board of Directors** will consist of seven members, 57% of whom are independent directors. The current composition is as follows:

- **Independent Director and Chairman** : Mr. Marcelino Oreja Arburua.
- **Chief Executive Officer (CEO)** : Mr. Mariano Berges del Estal.
- **Independent Directors** :
  - Mr. Alberto José Artero Salvador.
  - Mr. Luigi Pigorini.
  - Ms. Marta Martínez Queimadelos.
- **Sunday Counselors** :
  - Mr. Ignacio Casanova Sánchez de Ocaña.
  - Mr. Íñigo Barcaiztegui Quiroga.

The Council has three delegated committees, each chaired by an independent director:

- **Audit Committee, chaired by Mr. Alberto José Artero Salvador** : Oversees the integrity of financial information, internal control, risk management and the relationship with auditors.
- **Appointments and Remuneration Committee, chaired by Mr. Luigi Pigorini** : Manages appointments and remuneration policy, and evaluates the performance of the Council
- **Sustainable Development Commission, chaired by Ms. Marta Martínez Queimadelos:** Oversees the ESG strategy, compliance with corporate governance and non-financial communication.

Soltec Power Holdings has developed its governance model taking into account **international best practices** in transparency, accountability, and sustainability. In line with its regulatory compliance strategy and commitment to good governance, the operation of its corporate bodies adheres to the recommendations established in the **Code of Good Governance for Listed Companies** approved by the **Spanish National Securities Market Commission (CNMV)** , applying the principle of **"comply or explain** . "

Specifically, the company pays close attention to recommendations related to **corporate sustainability** , in accordance with current European regulations (CSRD and ESRS). Thus, Soltec Power Holdings has approved a **Sustainability Policy** , overseen by the Board of Directors through the **Sustainable Development Committee** , and regularly reports non-financial information to the market in accordance with the main international frameworks (GRI, TCFD, EU Taxonomy).

2.2 ETHICS AND INTEGRITY AND REGULATORY COMPLIANCE PROGRAM

In **2025, Soltec reaffirms** its commitment to integrity, business ethics, and corporate responsibility, applying good governance principles at every stage of its business, from corporate governance to daily operations and the supply chain. The company maintains a **zero-tolerance policy** toward fraud, bribery, or any corrupt practices, and operates with strict respect for human rights, the environment, and applicable laws.

In this context, Soltec maintains a robust and comprehensive **Compliance Program** , designed as a complete set of management tools to ensure effective compliance with applicable legislation, as well as with the ethical principles of integrity and transparency that define the company's corporate culture. This Program is a **key pillar of Soltec's governance strategy** , is tailored to the specific risks of its business, and is aligned with international compliance frameworks.

Objectives of the Regulatory Compliance Program

The main objectives of Soltec's Regulatory Compliance Program are:

- Establish an **effective prevention model** , aimed at identifying, evaluating and controlling the most relevant criminal and regulatory risks for the company, implementing measures for their prevention, early detection and proper management.
- Strengthen the **zero-tolerance policy** towards any conduct that may lead to the commission of criminal offenses or violations of ethical principles and good governance.
- Involve all Soltec **staff** in compliance with the regulatory framework and internal policies, promoting a culture of integrity, responsibility and shared supervision.
- To guarantee, in relation to third parties (clients, suppliers, partners, authorities, judicial bodies and society in general), that Soltec effectively exercises its **supervisory and control duties** , applying measures aimed at preventing and mitigating the commission of crimes by administrators, directors, employees and persons linked to the company.

This Program has been designed on the basis of a **rigorous analysis of the criminal and regulatory risks** that may impact the organization in the development of its activity, and is articulated through a set of policies, procedures, protocols and controls aimed at preventing, detecting, managing and sanctioning the possible materialization of said risks.

Key milestones achieved in 2025

During the 2025 fiscal year, Soltec has continued to strengthen its corporate integrity framework, highlighting the following milestones:

- **A comprehensive diagnosis of the Regulatory Compliance Program** was carried out by an **independent external consultant** , who globally assessed the effectiveness and maturity level of the compliance system, including the criminal risk prevention model, associated policies and procedures, as well as the **ethics and reporting channel** .
- **Identification of recommendations and opportunities for improvement** , derived from the external diagnosis, aimed at strengthening the coherence, effectiveness and robustness of the Compliance Program, whose implementation will be addressed progressively during the year 2026.
- **Maintenance and consolidation of the certifiable framework** in management matters, including the most relevant certifications for the company:
    - UNE 15896:2015 (Value-added purchasing management)
    - ISO 9001:2015 (Quality)
    - ISO 14001:2015 (Environment)
    - ISO 45001:2023 (Health and Safety)
    - ISO 20400:2017 (Sustainable Procurement)
- **Management and strengthening of the ethics and reporting channel** , guaranteeing its accessibility, confidentiality, anonymity and traceability, as a key tool for the early detection of possible breaches and the promotion of a culture of integrity.

Compliance Program Structure

Soltec's compliance system is structured around the following key instruments:

- **Code of Conduct** , as an ethical framework for corporate behavior.
- **Criminal Compliance Policy** , focused on the prevention of criminal risks.
- **Tax Compliance Policy** , which promotes responsible, transparent and voluntary tax compliance.
- **Anti-Corruption Protocol** , as a specific measure against improper practices, bribery and conflicts of interest.
- **Ethics and reporting channel** , as a confidential and secure mechanism for communicating possible irregularities.
- **Compliance Body** , as an independent and specialized body responsible for the monitoring, evaluation and continuous updating of the compliance system.

This framework helps to strengthen the trust of stakeholders and positions Soltec as an organization committed to legality, business ethics and the sustainability of its business model.

Code of Conduct

Soltec has a **corporate Code of Conduct** , approved in **2020** and **fully in force in 2025** , which establishes the ethical guidelines and mandatory action guidelines for all people who are part of the organization, regardless of their position, function or geographical location.

The Code of Conduct establishes the **ethical framework** for the daily professional performance of employees, managers, and governing bodies, and regulates how relationships with various stakeholders, including clients, suppliers, public administrations, shareholders, local communities, and society at large, should be managed. Through this instrument, Soltec promotes a culture based on **transparency, honesty, integrity, social and environmental responsibility** , and efficient resource management.

The Code of Conduct is **fully integrated into** the company's internal processes and its application is structured through the following actions:

- Delivery and explanation of the Code during the **process of incorporating** new members.
- Inclusion of the Code as a **mandatory document** in the employment and professional contracts signed by Soltec.
- Integration of the Code into the **periodic training activities** promoted by the Compliance area.
- Permanent availability of the Code on **internal communication channels** (intranet, employee portal, among others) and on the **corporate website** .

The Code of Conduct is based on Soltec's **mission, vision, and corporate values** and aligns with leading international standards on ethics and fundamental rights. Its content incorporates, among others, the following principles:

- **Honest, transparent and efficient** management of resources.
- Strict respect for **Human Rights and Public Freedoms** , in accordance with the Universal Declaration of Human Rights and the United Nations Guiding Principles.
- **Equal treatment and non-discrimination** , as well as the promotion of a safe, healthy and harassment-free work environment.
- **Express rejection of all forms of corruption, fraud or conflict of interest** .
- **Environmental** protection and promotion of a culture of sustainability integrated into decision-making and business development.

Anti-Corruption Protocol

Soltec has an **Anti-Corruption Protocol** integrated into its Regulatory Compliance System, whose objective is **to prevent, detect and, where appropriate, sanction** any conduct that could be related to corrupt practices, both in the public and private spheres.

The Protocol applies to **all persons within the organization** , including employees, managers, administrators and company representatives, regardless of their hierarchical level, geographical location or contractual arrangement, and establishes the **guiding principles for action** regarding business integrity and relations with third parties.

General principles of the Protocol

The Anti-Corruption Protocol expressly prohibits:

- Offering, promising or delivering, directly or indirectly, **payments, gifts, favors or benefits of any nature** to public officials or private entities in order to obtain an undue advantage or to improperly influence commercial or contractual decisions.
- Soliciting or accepting **gifts, gratuities, favors, or any other form of incentive** that may compromise objectivity or independence in decision-making is prohibited, except for those that:
    i. have a symbolic character or of little economic value, in accordance with customary business courtesy, and
    ii. are not linked, directly or indirectly, to the expectation or attainment of undue favors, advantages or awards.

These provisions apply to both **institutional relationships** and **commercial ties with suppliers, customers and strategic partners** , reinforcing Soltec's commitment to ethical, transparent business behavior aligned with the highest ethical standards.

Institutional commitment and regulatory compliance

Soltec strictly complies with national and international regulations in this matter, including **Organic Law 8/2007, on the financing of political parties** , whose reform expressly prohibits **donations by legal entities** to political parties and related entities.

In compliance with its Anti-Corruption Protocol, Soltec declares that **it has not made, nor will it make,** any type of donation or financial contribution to:

- Political parties, coalitions or electoral groups
- Trade unions or business organizations
- Foundations, associations or other entities directly or indirectly linked to the above
- Political campaigns, lobbying groups, trade associations or tax-exempt entities whose purpose is to influence legislative or political decisions

This ethical commitment reinforces Soltec's position as a transparent, ethical company aligned with the highest international standards in corporate governance and the fight against corruption.

Whistleblowing Channel

As part of its commitment to **transparency, legality and ethical behavior** , Soltec maintains an operational **Whistleblowing Channel** , accessible to both its internal staff and third parties with a professional relationship with the company (suppliers, contractors, clients and other partners).

This channel is designed as a **confidential, secure and effective mechanism** for anyone to **report irregular conduct, regulatory violations or breaches** of the Code of Conduct, Soltec's internal policies or the Compliance Program framework.

Open lanes

- **Reporting channel** : canaldenuncia@soltec.com Allows you to confidentially and substantiatedly report any suspicion or knowledge of improper behavior, breaches or bad practices.
- **Compliance query channel** : consultascompliance@soltec.com Aimed at resolving doubts, interpretations or clarifications related to the Regulatory Compliance Program or any of its associated policies and protocols.

Both channels are managed by **Soltec's Compliance Body** , guaranteeing independence, impartiality and confidentiality in the handling of the information received.

Whistleblower Protection Policy

Soltec has an **Internal Complaint Management Policy** , in accordance with the requirements of **Directive (EU) 2019/1937** , which establishes a structured procedure for the **receipt, analysis, investigation and resolution** of all communications received through the channel.

Among the fundamental principles included in this policy are:

- **Absolute confidentiality** regarding the identity of the complainant.
- **Express prohibition of reprisals** against people who make complaints in good faith.
- **Right to legal protection of the whistleblower** , even when the reported breach is not ultimately proven, provided that the communication was made on a legitimate basis.
- **Commitment to respond and follow up** on the status and resolution of the case, respecting the established legal deadlines and conditions.

Key Indicators	2025	2024
Number of complaints received through the established channel	10	12
% of complaints resolved in the same year	100	92
Relevant risks identified of a possible breach of human rights	0	0
Complaints of human rights violations	0	0

Any action that represents retaliation against a whistleblower will be considered a serious breach of the **Code of Conduct** and, where appropriate, may be subject to disciplinary investigation.

Whistleblowing Channel is an essential element of the internal control system and prevention of legal and reputational risks, and reinforces the culture of integrity, transparency and continuous improvement within the organization.

Prevention of Money Laundering and Terrorist Financing

Soltec remains firmly committed to **preventing money laundering and terrorist financing** , embracing this responsibility as an essential component of its culture of compliance, transparency, and legality. The company operates in accordance with the principles and recommendations of the **Financial Action Task Force (FATF)** and the regulations in force in each country in which it operates.

Soltec has conducted a **money laundering risk assessment** in the context of its business activities, and no critical elements or relevant risk factors were identified. Nevertheless, the organization maintains a **proactive approach to vigilance and enhanced prevention** through controls proportionate to its level of exposure.

Principles of action

- **Do not establish business relationships** with individuals or legal entities that do not comply with legal obligations regarding the prevention of money laundering and the financing of terrorism, or that do not provide sufficient and verifiable information.
- **due diligence** measures in relationships with clients, suppliers, strategic partners and other third parties, ensuring **proper identification, traceability of operations and the lawful origin of funds** .
- Having internal protocols that include **control, review and early warning mechanisms** , as well as consultation and reporting channels for possible signs of risk or irregularity.
- Updating **internal control criteria** , aligned with recent legislative reforms and European standards.
- Continuous monitoring of regulatory compliance and the performance of **periodic internal checks** to detect deviations or gaps in established procedures.

This framework allows Soltec to preserve the integrity of its operations, contribute to the **global fight against illicit activities** , and maintain a solid reputation with its stakeholders.

Competition Law

Soltec maintains its commitment to **fair competition, transparency and the proper functioning of markets** , promoting a fair competitive environment based on quality, innovation and strict compliance with applicable regulations on competition and consumer protection.

The company has a **consolidated internal regulatory framework** and a **specialized Compliance function** , which ensures the correct application of competition rules in all jurisdictions where Soltec operates. This approach is integrated across the Group's strategic and operational decision-making processes.

Since implementing its **Corporate Compliance Program in 2020 , Soltec has evolved towards a mature, proactive, and risk-oriented** compliance model , tailored to the specific characteristics of its sector and the international scope of its operations. The Program includes the identification, assessment, and control of key criminal and regulatory risks, both at the corporate level and in its subsidiaries, including, among others:

- Crimes relating to the **market and consumers** .
- **Business corruption** offenses .

Controls implemented

In order to reduce exposure to the risk of infringement in matters of competition law, Soltec applies a set of **preventive controls** , including:

- **Specific and periodic training** aimed at teams with greater exposure to risk, focusing on business ethics, relations with competitors, participation in tenders and obtaining market information.
- **Joint power of attorney structure** , which guarantees the collegial review of decisions with relevant legal or economic impact.
- **Prior review of contracts and operations** by the Legal and Risk areas, paying special attention to those clauses and practices that are sensitive from the perspective of competition regulations.
- **Dissemination and accessibility of the Ethics and Reporting Channel** , open to both employees and third parties, to report any indication of conduct contrary to applicable regulations.

Ethical and conduct principles

In accordance with the **Code of Conduct** , Soltec commits to:

- To compete fairly **and responsibly** in all markets in which it operates.
- Reject unfair business practices, including **misleading advertising** or the unlawful obtaining of information about third parties.
- Respect current regulations on **competition and consumer protection** , both nationally and internationally.
- Promote **transparency and equitable access** to business opportunities, avoiding any behavior that may distort free competition.

Additionally, Soltec provides employees and partners with a **Compliance Inquiry Channel** (consultascompliance@soltec.com), through which it is possible to request specific guidance on competition law or other areas of the Regulatory Compliance Program.

This commitment to free competition reinforces Soltec's position as an **ethical, transparent, and long-term sustainability-oriented organization** .

Data Protection

Soltec maintains its commitment to the protection of personal data, guaranteeing compliance with applicable privacy regulations, in particular Regulation **(EU) 2016/679 (GDPR)** , **Organic Law 3/2018 (LOPDGDD)** and applicable local regulations in the countries in which it operates.

The company manages information security and personal data protection through **policies and controls aligned with current regulations and international standards** , and no **significant incidents were identified during the**

year . It also integrates the principles of *privacy by design* and *privacy by default* into its processes and data handling, and has a **Data Protection Officer (DPO)** duly appointed and registered with the Spanish Data Protection Agency **(AEPD**).

Annual audit of analysis and compliance

During 2025, the company conducted an audit to update its Record of Processing Activities (RPA). The RPA is the essential document that forms the basis of the entire system for the proper handling and processing of personal data. This record includes a description of the various data processing activities carried out by the company or organization and must be kept up-to-date with the company's current situation and made available to the Supervisory Authority if required.

Specifically, the following has been done:

- **Addition of new data processing and deletion of others** that had fallen into disuse (such as the processing related to facial recognition).
- Modification of the **data controllers** .
- data **transfers carried out by the entity.**
- Update the names of those **responsible for each department** according to the data processing.

In addition, the daily activities of the various departments involved in data processing were verified, with the aim of identifying and resolving any doubts or non-compliance that might be occurring in the day-to-day operations of the entity.

Supervision and continuous improvement

The Data Protection Officer (DPO), together with the specialized external consultant hired for this purpose, maintains a firm and ongoing commitment to regulatory compliance and the protection of information security within the company. This proactive approach allows them to act diligently and in a coordinated manner to avoid, prevent, and resolve any situation that could affect the integrity, confidentiality, or availability of data, such as security breaches, data leaks, unauthorized access, or incidents arising from technical or organizational vulnerabilities. Continuous monitoring and advisory services are also provided, and internal training in these areas is promoted.

With this comprehensive approach, Soltec reinforces its position as an **ethical, responsible organization aligned with the principles of privacy and information security** , protecting the trust of all its stakeholders.

2.3 INFORMATION SECURITY AND CYBERSECURITY

Information Security Management System (ISMS)

In a context marked by increasing digitization of corporate processes and greater exposure to technological and cyber risks, Soltec maintains information security as a critical element for business continuity, the protection of corporate assets and the trust of its stakeholders.

Throughout 2025, the Company continued to strengthen its **Information Security Management System (ISMS)** , implemented across all critical processes and systems. The ISMS is aligned with international best practices and has been certified to ISO **27001:2022** since 2020, serving as the framework for protecting, managing, and controlling information within the organization.

The system allows for the identification, assessment and treatment of risks associated with information security, ensuring a structured and systematic approach to the protection of data, systems and technological services that support the Group's activity.

Guiding principles of security policy of the information

Soltec's Information Security Policy establishes the principles that govern the management and use of information throughout the organization, and which are mandatory for employees, collaborators, and third parties who have access to corporate systems or data. These principles are structured around the following key areas:

- **Confidentiality** : Information is only accessible by duly authorized persons, ensuring that access occurs in the appropriate context, time and conditions.
- **Integrity** : We ensure that the information is accurate, complete, and reliable, preventing unauthorized modifications that could compromise its truthfulness or usefulness.
- **Availability** : Systems and information remain accessible to authorized users when needed, even in the event of contingencies or operational incidents.
- **Regulatory compliance and legality** : The processing of information is carried out in accordance with applicable regulations and contractual commitments assumed, with special attention to the protection of personal data and privacy.

Cyber risk management and business continuity

Soltec has a **Business Continuity Plan (BCP)** designed to ensure the organization's operational resilience in the face of events that could affect the availability of information systems or the delivery of critical services. This plan addresses risk scenarios associated with, among others:

- Serious disruptions at corporate headquarters or data centers.
- Server outages, corporate systems or network services (including VPN).
- Cybersecurity incidents or unavailability of key personnel

The BCP relies on a structured risk analysis and defines specific preventive and recovery measures for the organization's main critical assets:

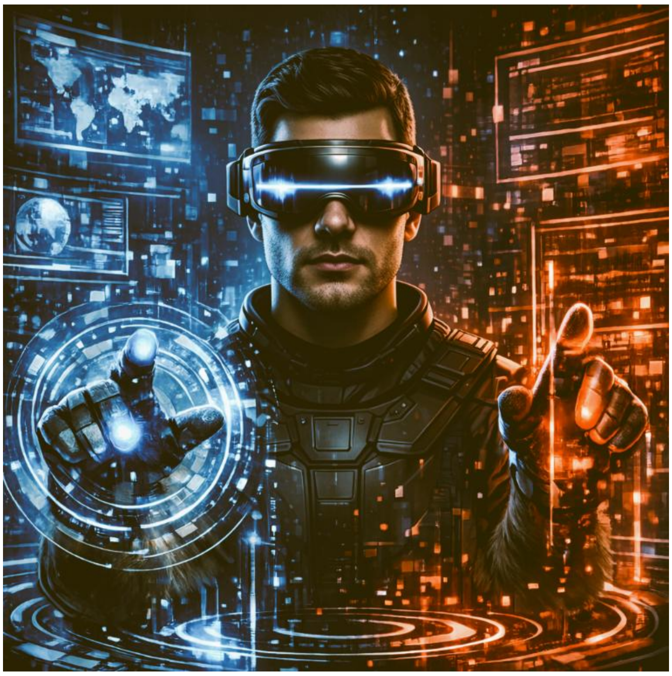
- **Technological infrastructure (servers)** : Systems backed up by redundant backups and external storage, which allow the recovery of operations without significant loss of information.
- **Critical applications and software** : Key solutions equipped with automatic backup mechanisms and external support for priority restoration in case of incident.
- **People and organization** : Procedures and structures that guarantee functional continuity through replacement plans and knowledge transfer.
- **Information and data** : Performing daily and external backups of relevant information, reducing the risk of loss, unauthorized access or security incidents.
- **Communications** : Availability of alternative connection lines that allow maintaining connectivity and basic operation in the event of network failures.

As evidence of the effectiveness of this approach, during the **widespread power outage in 2025** , Soltec maintained business continuity without significant impacts on corporate activity or the availability of critical systems. The organization was able to continue operating normally thanks to the preventive and contingency measures implemented, demonstrating the robustness of its Business Continuity Plan and its ability to respond to unforeseen external events.

This approach strengthens Soltec's ability to anticipate, manage, and respond effectively to technological and cyber risks, aligning information security with business objectives and with the internal control and governance requirements demanded by applicable regulatory frameworks.

Cybersecurity

Cybersecurity is integrated into Soltec as a **cross-cutting element of its management and governance model** , with a direct impact on operational continuity, the protection of digital assets, and the trust of its various stakeholders. In an increasingly digitalized environment exposed to technological risks, information security is an essential pillar for the proper development of the Group's activities.



Cybersecurity management is centrally **and globally coordinated** , relying on technical, human, and organizational resources designed to ensure the protection of critical systems, strengthen operational resilience, and guarantee compliance with the applicable regulatory framework in the countries where Soltec operates.

Throughout 2025, Soltec continued to strengthen its **internal cybersecurity culture** , understood as a key element in preventing and managing technological risk. Key areas of action include:

- **Training and awareness programs** aimed at employees and collaborators, with content focused on threat detection, the safe use of information systems and the correct management of corporate information.
- **Simulations of social engineering attacks** , such as controlled phishing campaigns, aimed at reducing the risk associated with the human factor and reinforcing good practices in the use of digital systems.
- **Review and continuous improvement** of the technical and organizational procedures of the Information Security Management System (ISMS), incorporating the lessons learned from audits, tests, incidents and the evolution of the technological and regulatory context.

This comprehensive approach allows Soltec not only to maintain alignment with international standards in information security, but also to consolidate a **corporate culture focused on prevention, resilience and responsible management of digital risks** .

ISMS Governance Reference and Alignment with International Standards

Information security is a structural element of Soltec's governance model and a key factor in protecting the confidentiality, integrity, and availability of the digital assets that support the Group's operations. Its proper management is essential to ensure business continuity, regulatory compliance, and the trust of various stakeholders.

In a context characterized by the increase and sophistication of cyber threats, Soltec adopts an approach based on **international standards and recognized frameworks** , which allow for a solid, coherent management system oriented towards continuous improvement.

ISO 27001:2022 Certification

Soltec has maintained its certification under the international standard **ISO 27001:2022** , a benchmark in information security management, since 2020. This standard provides the methodological framework for the **Information Security Management System (ISMS)** , enabling:

- Systematically identify and assess the risks associated with information security.
- Define and implement technical, organizational and legal controls appropriate to the organization's risk profile.
- Periodically evaluate the effectiveness of the implemented controls and promote their continuous improvement.

The certification is subject to **periodic external audits** , which verify compliance with the requirements of the standard and the suitability of the system to the evolution of the technological, operational and regulatory context.

Complementary frameworks in cybersecurity

In addition to complying with ISO 27001, Soltec integrates various **international frameworks into its cybersecurity strategy** . These frameworks serve as guides to strengthen technological risk management and incident response capabilities. Key examples include:

- **NIST Cybersecurity Framework (National Institute of Standards and Technology):** used as a framework to structure the processes of identification, protection, detection, response and recovery against cyber threats.
- **MITRE ATT&CK Framework:** used as a knowledge base for the analysis of attack techniques and tactics, contributing to improved preparedness, detection and response to advanced threats.
- **Directive (EU) 2022/2555 – NIS2:** considered as a regulatory framework of reference for strengthening cybersecurity governance, technological risk management and improving capabilities for prevention, notification and response to security incidents.

The combined application of these frameworks allows Soltec to strengthen its ability to anticipate, detect and contain incidents, aligning its security practices with the most demanding standards and with current and future regulatory expectations.

Focus on continuous improvement and adaptation to risk

Soltec maintains a permanent commitment to the **continuous improvement of its information security system** , periodically reviewing and updating its policies, procedures and controls to adapt them to the evolution of technologies, threats and the applicable regulatory framework.

This preventive and standards-based approach reinforces the maturity of the Company's technology governance model and contributes to consolidating a responsible and resilient management of risks associated with information and cybersecurity.

Organizational Resilience and Cyber Resilience

In a global environment characterized by high technological interdependence and increasing uncertainty, Soltec considers **operational resilience and cyber resilience** as structural elements of its management and governance model. Both concepts are key to preserving business continuity, protecting critical assets, and maintaining the trust of various stakeholders in the long term.

The Company has developed a systematic approach focused on **anticipating, resisting, responding to, and recovering** from disruptive events, with special attention to cyber risks and their potential impact on critical processes, information systems, and the provision of essential services.

Contingency and Recovery Plans

Soltec has **Contingency Plans** and **Disaster Recovery Plans** designed to manage different risk scenarios in an orderly and effective manner, including:

- Cybersecurity incidents, such as ransomware attacks or security breaches.
- Critical failures of the technological infrastructure or information systems.
- Situations of operational unavailability arising from internal or external causes.

These plans enable a rapid and coordinated response, limit the operational impact, and ensure the gradual recovery of affected services and processes. The associated procedures are subject to **periodic review** , supported by drills, technical tests, and internal audits that allow for the evaluation of their effectiveness and the identification of opportunities for improvement.

Crisis Management Protocol

The Crisis Management Protocol is a central element of Soltec's resilience model and establishes the framework for action in the event of particularly serious incidents. This protocol:

- Define the roles, responsibilities, and communication channels necessary for the immediate activation of response mechanisms.
- It involves the main corporate areas and functional departments, which act in a coordinated manner according to a previously defined scheme.
- It integrates cybersecurity, technological continuity, data protection, and internal and external communication management in a cross-cutting manner.

This approach allows for agile and aligned decision-making, reducing uncertainty and promoting effective management of critical situations.

Continuous improvement and organizational learning approach

In line with its culture of anticipation and prevention, Soltec maintains a **continuous review** of its plans, protocols and recovery capabilities, adapting them to:

- The evolution of cyber and technological threats.
- Regulatory changes and international requirements regarding risk management.
- The experience accumulated from simulations, audits and, where applicable, real activation scenarios.

This approach helps to strengthen the organization's ability to adapt to critical situations and to maintain the confidence of customers, investors, employees and other stakeholders, even in complex or highly uncertain contexts.

Detection, monitoring and response to cyber threats

Soltec maintains a proactive approach to protecting its technological infrastructure and digital assets against a constantly evolving cyber threat environment. To this end, the company has consolidated a model for early detection, continuous monitoring, and correlation of security events during 2025, aimed at reducing the risk of incidents and minimizing their operational impact.

The organization has a Security Information and Event Management (SIEM) system that centralizes and analyzes, in near real-time, information from multiple internal sources, including networks, servers, endpoints, and critical applications. This system allows for the proactive identification of anomalous behavior and potentially relevant events using correlation rules defined and tailored to Soltec's risk profile and operational characteristics.

Additionally, the SIEM environment incorporates advanced analysis and decision support capabilities based on the automated processing of large volumes of security logs. These functionalities facilitate the interpretation of complex technical information by the responsible teams, contributing to a more agile, consistent, and effective response to security incidents.

Thanks to this model, Soltec can:

- Identify risk patterns in early stages.
- Prioritize incident management based on its criticality and potential impact.
- Execute initial containment actions according to previously defined procedures.

This approach reinforces the Company's ability to maintain high levels of digital vigilance, improve its incident preparedness and strengthen the cyber resilience of its operations, in line with international cybersecurity standards and the frameworks adopted for technology risk management.

Independent Verification and Vulnerability Management

In line with its approach of **continuous improvement** and **proactive prevention of technological risks** , Soltec applies a structured model of independent verification, internal control and vulnerability analysis, aimed at strengthening the robustness of its cybersecurity posture and the resilience of its critical systems and infrastructures.

Compliance audits and independent verification

Soltec's information security management model is subject to periodic reviews, both internal and external, which allow for the evaluation of its alignment with reference standards and the evolving risk landscape. These reviews include:

- **External audits for ISO 27001:2022 certification** : carried out by accredited independent entities, with the objective of verifying compliance with the requirements of the international standard and ensuring the maintenance of the certification of the Information Security Management System (ISMS).
- **Internal technical audits** : carried out by the teams responsible for cybersecurity, focused on the review of policies, procedures, technical and organizational controls, as well as the identification of deviations and opportunities for improvement.

These reviews help ensure the effectiveness of the system and its alignment with international best practices.

Active vulnerability management

Soltec has a **Vulnerability Management System** designed to identify, assess, and address technical weaknesses that could affect the security of its infrastructure, applications, and services. This system allows for:

- Proactively detect technical vulnerabilities.
- Classify and prioritize them based on their criticality and potential risk to the operation.
- Define and implement corrective or compensatory measures in a documented manner and in accordance with established procedures.

Management relies on **automated analysis tools and periodic scanning** , complemented by specialized technical reviews when necessary.

Penetration testing and system hardening

Soltec regularly conducts **penetration tests and ethical hacking exercises** to evaluate the robustness of its defenses against potential real-world attack vectors. The results of these exercises are translated into action plans designed to strengthen the security of the systems and services tested.

Additionally, the Company applies **system hardening practices** to hardware and software components, including disabling unnecessary functionalities, strengthening secure configurations, and systematically applying security patches and updates.

Continuous improvement and organizational learning approach

With the aim of maintaining an adequate level of preparedness against emerging threats, Soltec promotes a culture of continuous improvement in cybersecurity, which includes:

- Participation in cybersecurity forums, conferences and specialized spaces, promoting continuous learning and the exchange of best practices.
- Conducting **cyber crisis simulations** allows testing the response capacity to serious incidents, validating crisis management protocols, and strengthening coordination between the different areas involved.

This set of actions contributes to strengthening Soltec's cybersecurity model, increasing its ability to anticipate technological risks, and protecting the interests of its stakeholders with a rigorous and responsible approach.

2.4 RISK MANAGEMENT

In the area of risk control and mitigation, the **Board of Directors and the Audit Committee** consider **risk management** a key element of the **Internal Control System (ICS)** and a fundamental pillar of the Group's strategy.

Therefore, the Risk function—created in 2019 and funded with its own resources—leads the implementation of risk management mechanisms, as well as providing support to the operational areas responsible for the first line of defense.

Soltec Power Holdings has a **Global Risk Management Policy** , approved in 2020 and updated to reflect the evolving business context, which establishes the guidelines for the risk management system at the group level. This policy enables the identification, classification, and prioritization of risks, their regular monitoring, and the leveraging of emerging opportunities, all in line with the company's corporate and sustainability strategy.

Risk management is a cross-cutting activity integrated into all processes at **Soltec Power Holdings** , and is structured through a **three-line-of-defense model** , in line with internationally recognized frameworks (COSO ERM, ISO 31000).

At the **first level** , the company's various operational departments assume direct responsibility for the identification, assessment and control of risks associated with their activities, relying on specific policies and procedures aligned with the Group's strategy.

The **second line of defense** is represented by the **corporate risk management function** , which provides methodological support, monitoring, and coordination of risk management. This area leads the implementation of the **Group's Risk Management System** , organizes specific committees, validates risk maps, and collaborates in the design of mitigation plans in coordination with the relevant departments.

The **third layer** is comprised of the **Internal Audit Department** , which operates independently and objectively, overseeing the effective functioning of the internal control system and assessing the maturity level of the risk management model. Its scope encompasses both financial and operational aspects (logistics, procurement, human resources, project execution, compliance, etc.), defining the scope of audits based on the risk analysis conducted during the annual planning phase.

Since 2021, the company has progressively deployed the **Internal Control System for Financial Reporting (ICSIF)** , adapted to the specific characteristics of the different companies within the Group. Currently, this system is fully operational and is periodically reviewed by Internal Audit and the Audit Committee.

During 2025, the SCIIF has continued to evolve to adapt to the Group's operating context, strengthening the traceability of critical processes, the segregation of duties and the documentation of control evidence, in line with best practices in corporate governance.

With the progressive strengthening of the non-financial governance framework, Soltec has developed and implemented an **Internal Control System for Sustainability Information (SCIIS)** , whose objective is to guarantee the reliability, traceability, integrity and regulatory compliance of the information reported in the Non-Financial Information Statement.

The SCIIS is structured on the following pillars:

- **Definition of responsibilities and segregation of duties** , assigning to each area that owns the information (EHS, Finance, HR, Operations, Purchasing, etc.) the responsibility for generating, validating and reporting data.
- **Collection and consolidation of information** , including homogeneous calculation criteria, hypotheses used and data sources.
- **First and second level controls** , carried out by the information owner area and by the EGS area respectively, aimed at verifying the coherence, consistency and reasonableness of the reported indicators.

- **Document traceability** , ensuring the preservation of evidence and supporting documents that allow review by the external verifier.
- **Oversight by senior management and governing bodies** , including review of the NFI by the Sustainable Development and Audit Committee.

With this model, Soltec reinforces the robustness of its internal control framework in matters of sustainability, aligning the non-financial reporting process with standards equivalent to those applied to financial information.

During fiscal year 2025, the Internal Audit Department's activities were impacted by the corporate restructuring process, which led to the **approval and implementation of a reduced Audit Plan** , concentrated in the second half of the year. This plan was prioritized based on the most significant risks and approved by the Audit Committee. Furthermore, follow-up on recommendations and key internal controls was maintained, ensuring adequate oversight within the new organizational context.

Soltec's risk management system is based on three fundamental pillars:

This model allows the organization to anticipate threats, strengthen its resilience capacity, and take advantage of operational and strategic improvement opportunities at all levels.

Effective risk management is key to strengthening **stakeholder confidence** and contributing to business sustainability. Proper anticipation of and response to risks allows **Soltec Power Holdings** to reduce uncertainty, increase its adaptability, and offer greater confidence in its future outlook.

In 2025, the Group faces a particularly complex financial, operational, and geopolitical environment, which will affect its short- and medium-term activities. Within this context, the company has managed a financial restructuring and operational downsizing process that has involved adapting its organizational structure and strategically focusing on its priority business lines.

This process involves risks associated with the correct execution of the approved plan, compliance with the commitments made to creditors and the consolidation of the new operating model, aspects that are subject to specific monitoring by the Board of Directors and the Audit Committee.

The main **strategic and market risks** identified include:

- **Strategic and corporate planning risk** , associated with focusing on priority business lines and the ability to adapt to market evolution.
- **Market and competition risk** , derived from demand volatility, pressure on prices and margins and the evolution of sector costs.
- **Geopolitical and international trade risk** , linked to international tensions, trade restrictions and changes in the conditions of access to certain markets.

In the **operational and technological sphere** , the most relevant risks include:

- **Risk of project and operations execution** , related to the correct planning, development and control of projects in multiple geographies, as well as with product quality and contract management.
- **Supply chain and supplier risk** , associated with dependence on critical suppliers and the stability of global logistics.
- **Technological risk, systems and innovation** , which integrates cybersecurity, the continuity of critical systems, the protection of intellectual property and the management of emerging technologies.
- **Physical security and operational continuity risk** , related to the protection of assets, facilities and operations.
- **Occupational health and safety risk** , linked to the prevention of occupational risks in industrial and construction environments.
- **Human capital risk** , related to the retention of key talent, turnover and adequate organizational adaptation.

From a **financial perspective** , the following risks stand out:

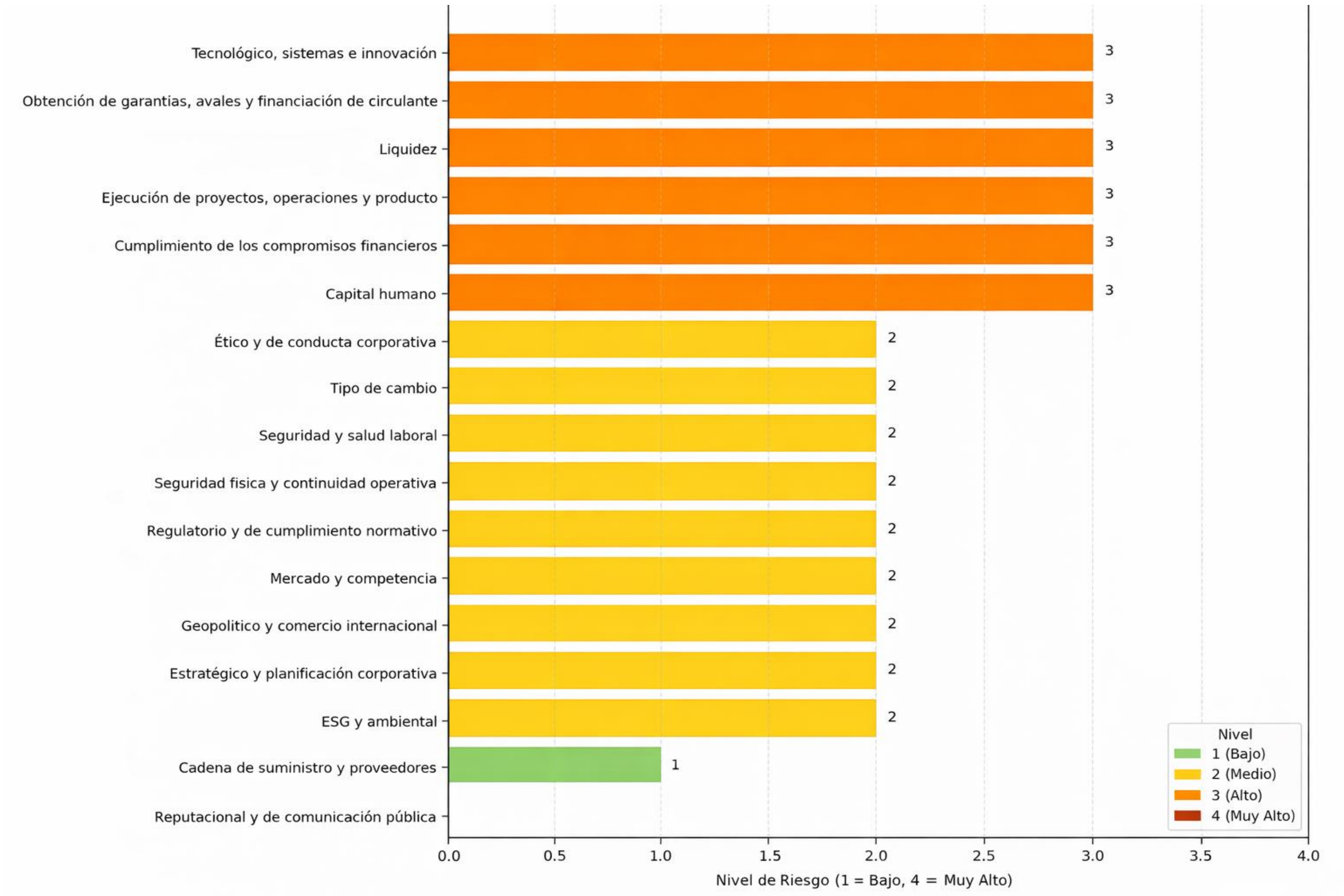
- **Risks associated with compliance with the financial commitments arising from the restructuring agreement,** including covenants, amortization schedules and conditions linked to the current financing.
- **Risk of obtaining guarantees, sureties and working capital financing** necessary for the execution and securing of contracts
- **Liquidity risk** , aggravated by the concentration of projects and tight execution deadlines
- **Exchange rate risks** , especially in transactions involving USD, BRL, and MXN

Additionally, the Group highlights the **following regulatory, ESG and reputational risks** :

- **Regulatory and compliance risk** , derived from the evolution of the regulatory framework in energy, tax, commercial, criminal and sustainability matters.
- **ESG and environmental risk** , associated with the integration of environmental, social and governance criteria, as well as the impacts derived from climate change and extreme phenomena.

- **Ethical and corporate conduct risk** , linked to the prevention of fraud, corruption and the maintenance of a culture of integrity.
- **Reputational and public communication risk** , related to the perception of stakeholders and its potential impact on commercial activity and access to financing.

The following matrix shows the classification of these risks according to their level of criticality (Critical, High, Medium or Low), according to the internal assessment model based on probability and impact applied during the 2025 fiscal year.



2.5 CONTRIBUTION TO SUSTAINABLE DEVELOPMENT

Soltec Power Holdings bases its commitment to sustainability on generating a positive, real, and measurable impact on its stakeholders. The products, services, and projects the company develops offer its clients efficient, innovative, and responsible energy solutions, while also contributing to the socioeconomic and environmental development of the communities in which it operates.

Within this framework, Soltec has evolved its approach to sustainability applied to photovoltaic projects, integrating it across the design, development, and implementation of its technological solutions. During 2025, the company specifically promoted the development of agrivoltaic projects, focusing on models that reconcile renewable energy generation with agricultural land use, fostering a balanced coexistence between productive activity, environmental protection, and rural development.

This progress has materialized through **Agrisun** , Soltec's agrivoltaic solution, designed to maximize land use, preserve agricultural activity, and provide added value to local communities without compromising the technical efficiency of photovoltaic installations. Agrisun thus positions itself as a solution aligned with the principles of sustainability, innovation, and adaptation to the land that guide the Group's strategy.

The integration of agrivoltaics into Soltec's value proposition reinforces its alignment with the objectives of the energy transition, the European Union's green taxonomy, the CSRD and the new European sustainability reporting standards (ESRS), consolidating itself as a strategic lever for the development of responsible and resilient projects.

Projects developed under this approach are characterized by their ability to reconcile clean energy generation with environmental protection, efficient use of resources and the promotion of local socio-economic development, adapting to the particularities of each territory and the needs of its stakeholders.

With **AgriSun, the need to choose between energy generation** and **agricultural activity** is eliminated . The solar trackers adapt to the farm, allowing crop growth, livestock grazing, and machinery operation to continue normally, without interruption.

Whether on agricultural, livestock or mixed farms, **AgriSun** facilitates the **dual use of land** in a simple and efficient way.

The solution incorporates **adjustable height** and **intelligent modes** adapted to different scenarios:

- **Harvest Mode:** free and safe passage for machinery
- **Crop Mode:** Light management to optimize plant development conditions
- **Livestock Mode:** configuration focused on safety and animal welfare

Agrivoltaics is a sustainable solution that integrates **renewable energy generation** and **agricultural activity** , also providing **added value** to the territories.

Combining **food production** and **electricity generation in the same system allows for the creation of synergies that improve economic and environmental** performance , by integrating two key sectors for sustainable development and contributing to the **protection of biodiversity** .

The implementation of these projects relies on a **collaborative approach with local authorities and communities** , aimed at identifying specific needs and maximizing the positive impact on the environment. By fostering value creation at the local level, agrivoltaics can act as a driver of **sustainable economic growth** and contribute to improving the **quality of life** in the communities where it is developed.

The elements that characterize and differentiate the agrovoltaic proposal are:

- **Sustainability:** integrates renewable generation, sustainability and employment, also contributing to reducing **greenhouse gas emissions** associated with the agricultural sector.
- **Integration:** It fosters **synergies** between energy and agriculture, promoting a more sustainable and efficient agricultural activity.
- **Versatility:** The **SF7 tracker** can act as a windbreak and a protective element against extreme heat radiation and high light intensity. Its tracking system allows the device to be fixed in a specific position at night.
- **Optimization:** The presence of solar panels can reduce **evaporation** and increase **soil moisture** , optimizing irrigation water consumption. Additionally, the reduced temperature of the solar panels can contribute to improved electrical efficiency and increased energy production.
- **Profitability:** It allows for **greater profitability per hectare** of cultivated land. The associated electricity generation can help support crop **financing and improve income stability.**
- **Productivity:** the use of **modules with bifacial cells** allows for increased energy performance, achieving a production **20–30% higher** than a fixed structure photovoltaic plant.

Commitment to the social and economic environment

Circular economy and environmental management

Biodiversity protection

Corporate Sustainability Policy and ESG Governance (CSRD/ESRS and SDGs)

Soltec Power Holdings maintains its **Corporate Sustainability Policy** , approved in previous years and revised to ensure its alignment with the European regulatory framework and the expectations of its stakeholders. Through this policy, the company reaffirms its commitment to sustainable and responsible value creation for employees, customers, suppliers, shareholders, and society, integrating environmental, social, and governance (ESG) criteria into decision-making and business management. This framework is consistent with the **new requirements arising from the CSRD and ESRS** , as well as the **Sustainable Development Goals (SDGs)** .

The implementation and compliance with this policy is overseen by the highest governing body, through the **Board of Directors' Sustainability Committee** , established in 2020 as a specialized body for ESG matters. This committee regularly monitors the Group's non-financial performance, promotes the definition of sustainability priorities and action plans, and assesses exposure to risks and opportunities associated with ESG factors, ensuring the integration of sustainability within the corporate governance and control framework.

Creating **value for society** is one of the cornerstones of Soltec's sustainability approach. Through its products, technological solutions, and solar power generation projects, the company directly contributes to the **decarbonization of the economy** and the advancement of the energy transition. In addition, it promotes positive socioeconomic impacts by **generating employment** , boosting the local economy, and strengthening relationships of trust with communities and stakeholders in the areas where it operates.

During 2025, Soltec has reinforced its positive social impact approach by integrating shared value criteria throughout the life cycle of projects and the supply chain, incorporating, among others, **circular economy principles** , responsible and inclusive procurement practices, local training and capacity-building initiatives, and dialogue and participation mechanisms with communities, with the aim of improving impact management and promoting a measurable and sustainable contribution over time.

Furthermore, alignment with international initiatives and frameworks remains a key lever for consolidating corporate commitment to ESG best practices. In this area, the following stand out:

- Soltec maintains its commitment to the principles of responsible action in matters of human rights, labor standards, environmental protection and the fight against corruption, integrating them across its corporate policies, internal procedures and management models.
- **Alignment with the 17 Sustainable Development Goals (SDGs)** , with a strategic focus on those directly linked to its activity and capacity to contribute:
    - **SDG 7** – Affordable and clean energy
    - **SDG 8** – Decent Work and Economic Growth
    - **SDG 9** – Industry, Innovation and Infrastructure
    - **SDG 12 –** Responsible production and consumption
    - **SDG 13** – Climate Action
    - **SDG 17 –** Partnerships for the Goals

Soltec promotes social, environmental and educational actions aimed at these objectives, with the aim of strengthening the measurement of impact, improving the traceability of results and ensuring the continuity and scalability of initiatives in the medium and long term, in line with its sustainability strategy and governance framework.

Soltec Power Holdings integrates the **Sustainable Development Goals (SDGs)** as a complementary reference framework to the **CSRD** and the **European Sustainability Reporting Standards (ESRS)** , ensuring consistency between its ESG strategy, the identified impacts, risks and opportunities and the Group's sustainability priorities.

During **2025** , Soltec's contributions to the **2030 Agenda** will materialize through policies, processes and operational actions linked to the environmental, social and governance areas, with special emphasis on the following SDGs:

- **SDG 7 – Affordable and Clean Energy (ESRS E1, E2):** The Group's core business focuses on the development and supply of photovoltaic solutions and solar tracking technologies that contribute to the decarbonization of the energy system. These activities generate positive impacts on reducing greenhouse gas emissions and expanding renewable generation capacity, mitigating climate transition risks and driving opportunities associated with the energy transition.

- **SDG 8 – Decent Work and Economic Growth (ESRS S1, S2):** Soltec promotes safe and fair working conditions, prioritizes local hiring and technical capacity building, and implements human and labor rights due diligence mechanisms throughout its value chain. These measures contribute to the creation of quality jobs and the mitigation of social risks associated with inadequate labor practices.

- **SDG 9 – Industry, Innovation and Infrastructure (ESRS E1, E5, S2):** Technological innovation and the development of proprietary solutions (e.g., advanced solar trackers and performance optimization solutions) contribute to improving the operational and energy efficiency of projects and incorporating circularity criteria into the design and lifecycle management (durability, maintenance, repairability, efficient use of materials, and end-of-life management). Furthermore, the industrialization and deployment of these solutions require active value chain management, integrating technical, environmental, and social requirements into relationships with suppliers and contractors.

- **SDG 13 – Climate Action (ESRS E1):** The Group implements measures aimed at mitigating climate change, including managing its carbon footprint, using renewable electricity at its operational centers, and promoting sustainable mobility practices. These actions align with European climate objectives and contribute to reducing environmental impacts and regulatory and market risks associated with climate change.

- **SDG 17 – Partnerships for the Goals (ESRS G1, S3):** Soltec participates in cooperation and partnership initiatives with international organizations, industry associations, and other relevant stakeholders, integrating collaboration as a lever for impact management and the development of sustainable solutions. These partnerships contribute to strengthening ESG governance and the coherence of the Group's sustainability strategy.

2.6 SUSTAINABLE FINANCE TAXONOMY

In July 2020, **Regulation (EU) 2020/852** , known as the Taxonomy Regulation, entered into force, establishing the framework for determining whether an economic activity can be considered environmentally sustainable. According to Article 8, all companies subject to **Directive 2014/95/EU** (NFRD), and therefore to its transposition into Spanish law through **Law 11/2018** , must include information in their **Non-Financial Information Statement (NFIS)** on the degree to which their activities are aligned with the Taxonomy.

To develop the reporting requirements, the European Commission adopted **Delegated Regulation (EU) 2021/2178** , which details the key indicators that must be disclosed, as well as the required qualitative content. This regulation has been evolving since 2022, progressively expanding the scope of economic activities covered and the level of detail required.

In 2025, Soltec Power Holdings maintains its commitment to **transparency and regulatory compliance** in matters of sustainability, and presents in this report the information required by Article 8 of Regulation (EU) 2020/852 and its delegated acts, in relation to the financial year ended December 31, 2025.

The year 2025 is the fifth year in which Soltec analyzes and reports on the proportion of its economic activities that can be considered environmentally sustainable, in accordance with the application requirements introduced by the EU Taxonomy .

Specifically, Soltec discloses the following indicators, calculated in accordance with the provisions of the current regulatory framework:

- **Proportion of eligible economic activities aligned with the Taxonomy** , in relation to turnover, investments (CapEx) and operating expenses (OpEx)
- **Additional qualitative explanations** in accordance with Annex I of Delegated Regulation (EU) 2021/2178, where relevant
- **Methodology applied, limitations and estimation criteria** , in accordance with the guidelines issued by the European Commission
- **Analysis of evolution compared to previous exercises** , including methodological adjustments and expansion of the scope of application

Additionally, Soltec is working on progressive alignment with the new European Sustainability Reporting Standards (ESRS), within the framework of Directive **(EU) 2022/2464 (CSRD)** , whose application will be mandatory for the company **from the year in which the Directive is transposed into the applicable legal system and becomes applicable to Soltec** .

information corresponding to Section 1.2 of Annex I of Delegated Act (EU) 2021/2178

Accounting policies

The accounting policies applied by **Soltec Power Holdings** are detailed in **Note 2 to the consolidated financial statements for the year 2025.** In this regard, it should be noted that the **Group's consolidated annual accounts** have been prepared in accordance with the **International Financial Reporting Standards adopted by the European Union (IFRS-EU)** and the interpretations issued by the International Financial Reporting Interpretations Committee (IFRIC) in force as of December 31, 2025, as well as with the commercial legislation applicable to entities that prepare financial information in accordance with IFRS.

The application of these standards allows the consolidated annual accounts to show a **true and fair view of the assets, consolidated financial position** , consolidated results of operations of the Group, changes in its consolidated net worth and consolidated cash flows for the year ending on that date.

The figures contained in the documents comprising the consolidated annual accounts—the consolidated statement of financial position, the consolidated profit and loss account, the consolidated statement of comprehensive income, the consolidated statement of changes in equity, the consolidated statement of cash flows, and the notes to the financial statements—are expressed in **thousands of euros** , unless expressly stated otherwise. Figures have been rounded to the nearest thousand, which is the **functional and presentation currency of the parent company** . The use of rounded figures may, in some cases, result in **immaterial differences** in the totals or in the changes between financial years.

The preparation of these consolidated financial statements in accordance with IFRS requires the use of **critical accounting estimates** and the exercise of **professional judgment by management** in applying certain Group accounting policies. Note 2 above identifies those areas that involve a greater degree of judgment, complexity, or significant estimates in the preparation of the financial information.

In the specific case of **Soltec** , as a non-financial entity that reports under IFRS standards and in accordance with the **Sustainable Finance Taxonomy** , the **categories applied** for the presentation of the required indicators (turnover, investments in fixed assets –CapEx– and operating expenses –OpEx–) have been determined according to the methodological criteria defined in **Delegated Regulation (EU) 2021/2178** , to the extent that they are applicable.

The information on the financial indicators has been extracted from the financial accounting systems to ensure its consistency with the information in Soltec's annual accounts. To ensure the correct allocation of the financial indicator values to the taxonomic activities, Soltec has assessed each contract based on the type of activity performed, assigning only one activity per contract, and has followed the same process to assess the CapEx items, thus avoiding any **risk of double counting** .

In the case of **Soltec Power Holdings** , as a **non-financial company** that applies **International Financial Reporting Standards (IFRS)** , the classification of the indicators required by Article 8 of Regulation (EU) 2020/852 and its Delegated Regulation 2021/2178 —turnover, investments in fixed assets (CapEx) and operating expenses (OpEx)— is carried out in accordance with the following accounting criteria:

- **Turnover**

It includes income recognized as defined in Article 2(5) of **Directive 2013/34/EU** and included in the consolidated financial statements in accordance with **IAS 1** , paragraph 82(a), as set out in **Commission Regulation (EC) No 1126/2008** adopting certain International Accounting Standards pursuant to Regulation (EC) No 1606/2002 of the European Parliament and of the Council.

- **Investments in fixed assets (CapEx)**

It includes investments accounted for in accordance with the following sections of IFRS:

- **IAS 16 – Property, plant and equipment** , paragraph 73, letter e), sections i) and iii)
- **IAS 38 – Intangible Assets** , paragraph 118, letter e), subparagraph i)
- **IFRS 16 – Leases** , paragraph 53, letter h)

These categories include both acquired assets and improvements made, provided they meet the capitalization criteria established by these rules.

- **Operating Expenses (OpEx)**

It includes direct operating costs that are not capitalized and that relate to:

- Research and development activities
- Measures for the renewal, maintenance, or repair of physical assets
- Short-term leases
- Outsourced costs associated with the ongoing maintenance of assets
- Other direct expenses related to the efficient and sustained operation of the assets

These expenses are specifically identified in the financial statements and are expressly excluded from the CapEx calculation to ensure the integrity of the reported data.

- **Mechanisms for controlling and eliminating duplicates**

To ensure that **amounts are not duplicated** between indicators, Soltec applies control mechanisms based on:

1. Strict compliance with the accounting criteria established in IFRS, which ensures that the same item is not recorded simultaneously in more than one key indicator.
2. The elimination of **intragroup transactions** , whose amounts are adjusted to zero in the consolidated financial statements, and are correctly charged to the original generating items.

Analysis of eligible activities

The information disclosed pursuant to the Taxonomy Regulation covers all **entities that are part of the consolidation perimeter of the consolidated annual accounts of Soltec Power Holdings SA**

With the aim of facilitating the analysis and classification of economic activities in accordance with the eligibility and alignment criteria established by European regulations, the group companies have been **grouped according to the nature of the main activity carried out by each of them** :

a) Soltec Power Holdings: Holding Company (not eligible)
b) Soltec Energías Renovables SLU: Company dedicated to the manufacture, supply, installation and maintenance of solar trackers.
c) Soltec Development SAU: Company dedicated to the promotion and execution of projects for energy production through photovoltaic solar energy.
d) Soltec Asset Management SLU: Company dedicated to the management of construction and operation assets of photovoltaic parks.

Based on the **eligible and ineligible activities** of Soltec previously identified in relation to the **environmental objectives of Mitigation** during the previous year, in 2025 an analysis has been carried out in two complementary aspects:

- **assessment** has been carried out of the possible fit of the Group's activities with the **four additional environmental objectives** established by the EU Taxonomy (sustainable use of water and marine resources, circular economy, pollution prevention and control, and protection of biodiversity and ecosystems).

- **eligibility of new contracts and projects incorporated during the 2025 fiscal year** has been analyzed , considering their impact on the different **financial KPIs to be reported** (revenue, CAPEX and OPEX), according to the consolidation perimeter of the FY25 fiscal year.

Given that Soltec carries out its operations within the **renewable energy sector** , and in particular in the field of **photovoltaic solar energy** , the analysis carried out during the 2025 fiscal year confirms that **the company's main contribution to sustainable development** , under the environmental objectives defined by the European Commission, continues to be the **mitigation of climate change** .

Following a detailed review of the economic activities defined in the **new environmental objectives incorporated into the EU Taxonomy** , no **new activities applicable** to Soltec's operations have been identified that would complement the sustainable activities reported in previous years. Consequently , the activities currently reported by the Group remain within the **scope of eligibility and alignment defined by the Climate Change Mitigation** objective , through the following categories:

- **Activity 3.1 "Manufacturing of renewable energy technologies"** corresponds to the **design, manufacturing, and supply of solar trackers** carried out by the **industrial division (Trackers)** . This technology is considered a key enabler for the generation of clean energy from photovoltaic sources.

- **Activity 7.6 "Installation, maintenance and repair of renewable energy technologies"** Includes the services provided by the **Trackers division** related to the **commissioning, repair of solar trackers, technical support and maintenance** of solar infrastructure, in line with the classification applied in previous years.

- **Activity 4.1 "Electricity generation using photovoltaic solar technology"** Encompasses the activities led by the **Energy division** , including the **development, construction, operation and maintenance of photovoltaic plants** , thus covering the entire life cycle of the renewable asset.

Following a review of the **latest updates to Delegated Regulation (EU) 2021/2139** , published during 2023, concerning the **establishment of new technical criteria** to determine the conditions under which an economic activity can be considered as a substantial contributor to **climate change mitigation** or **adaptation** , it is noted that **no relevant modifications have been introduced** that provide a **more precise or restrictive definition of the concept of "renewable energy technologies"** .

the interpretation applied by Soltec remains valid , according to which the **solar trackers** designed, manufactured and supplied by the Group **are properly included in this concept** , taking into account their technological nature, their specific function within the photovoltaic solar generation system, and their direct contribution to the optimization of the energy performance of the installations.

Alignment analysis

For the analysis of alignment with the EU Taxonomy, Soltec considered the **three eligible economic activities framed within the objective of Climate Change Mitigation** , as these activities **contribute directly to the reduction of greenhouse gas (GHG) emissions** and, therefore, to the decarbonization of the economy. This analysis was carried out in accordance with the **technical criteria established in Annex I of Delegated Regulation (EU) 2021/2139 on Climate** .

Furthermore, in order to assess whether these activities meet the requirements of:

- **Substantial contribution to the environmental objective (CCS)** ,
- and **not cause significant harm to the other objectives (DNSH)** ,

Soltec has conducted a thorough review of the **technical evaluation criteria defined in the Delegated Climate Regulation** , supplemented by the **collection, analysis, and validation of** relevant internal documentation. This documentation includes corporate policies, operating procedures, records, technical and environmental reports, and evidence of the management system, with the aim of **verifying compliance with the requirements established** by the applicable regulatory framework.

➢ Substantial Contribution Criteria (SCC)

The **three eligible economic activities developed by Soltec** meet the **criteria for substantial contribution (CCS)** to the objective of **Climate Change Mitigation** , by virtue of their own technological and operational nature, which allows for an effective reduction of emissions and an improvement in the environmental performance of the energy system.

With regard to compliance with the **minimum social safeguards** , as established in **Article 18 of Regulation (EU) 2020/852** , Soltec has a set of **policies, procedures and control mechanisms** aimed at ensuring:

- Respect **for human and labor rights** in all its operations and in the supply chain;
- The **prevention of corruption and bribery** ;
- **Responsible and transparent fiscal** management ;
- And the promotion of **fair and ethical competition** in the markets where it operates.

The details and evidence supporting compliance with these safeguards are set out in **Chapter 2 "Corporate Sustainability, Ethics and Risk Management"** and Chapter **4 "Social Commitment, People and Stakeholder Relations"** of this report.

➢ Non-significant harm (DNSH) criteria on remaining targets

Soltec has reviewed its eligible economic activities in accordance with the **Do Not Cause Significant Harm (DNSH) principle** with respect to the five additional environmental objectives defined in the EU Taxonomy, in accordance with the technical criteria established in **Delegated Regulation (EU) 2021/2139** . The measures and systems implemented by the company are detailed below:

- **Climate Change Adaptation (activities 3.1, 4.1 and 7.6)** Soltec has a physical climate risk analysis, accompanied by an adaptation solutions plan to mitigate the identified risks, thus meeting the DNSH requirements linked to this objective. The company has also developed **internal monitoring tools** , establishing metrics and targets that allow for continuous monitoring of these risks.

- **Sustainable use and protection of water and marine resources (activity 3.1)** Soltec's industrial facilities have an **Environmental Management System certified according to ISO 14001** , which regulates the management of wastewater, water consumption, and the control of associated impacts. The photovoltaic plants undergo **environmental impact assessments** that guarantee the protection of water quality and the prevention of water stress.

- **Transition to a circular economy (activities 3.1 and 4.1)** In manufacturing (3.1), Soltec sets **waste reduction and recovery targets , incorporating designs that improve the durability and efficiency of solar trackers, even in adverse weather conditions. In electricity generation (4.1), material reuse and recycling** practices are promoted during the construction and operation phases of photovoltaic plants, in accordance with the **environmental management plans for construction** defined by the company.

- **Pollution prevention and control (activity 3.1)** In addition to ISO 14001 certification, Soltec ensures that the materials used in the manufacture of solar trackers (such as steel and electronic components) **do not generate restricted or hazardous substances** , in accordance with the Delegated Climate Regulation. The industrial facilities hold all **required environmental licenses and permits** , guaranteeing regulatory compliance.

- **Protection and restoration of biodiversity and ecosystems (activities 3.1 and 4.1)** Soltec integrates biodiversity protection criteria into its **environmental management system** , including specific assessments for its industrial activities and power generation projects. **Environmental impact assessments include mitigation and compensation** measures to minimize the disruption of natural habitats and ecosystems, both at photovoltaic plants and production facilities.

Methodology for calculating economic indicators according to the EU Taxonomy

Once the exercise of classifying economic activities described in the previous section has been carried out, the **economic indicators required by Article 8 of Regulation (EU) 2020/852 have been calculated** , in accordance with the methodology established in **Annex I of Delegated Regulation (EU) 2021/2178** , specifically in points 1.1.2.1 and 1.1.2.2.

a) Eligible and aligned activities (that conform to the taxonomy and are environmentally sustainable)

📊 Income Indicator (INCN)

- **Calculation of the Denominator:** Includes the revenue recognized by Soltec in accordance with International Accounting Standard (IAS) 1, paragraph 82(a), adopted by Commission Regulation (EC) 1126/2008. In the case of Soltec, the net amount of turnover is shown in note 16 of the Consolidated Annual Accounts.

- **Numerator Calculation:** This corresponds to the part of the consolidated net income that is part of the denominator and that meets the criteria of substantial contribution (CCS), not causing significant harm (DNSH) and minimum social guarantees.

CapEx indicator (Investments in fixed assets)

- **Calculation of the Denominator:** This includes additions to tangible and intangible assets for the year before depreciation, amortization, and any revaluations, including those resulting from revaluations and impairments, for the year, excluding changes in fair value. The denominator also includes, where applicable, additions to tangible and intangible assets resulting from business combinations. In the case of Soltec, the value of these additions is included in the Consolidated Financial Statements for 2025 as follows:
  - Note 6: Increases in intangible fixed assets: 3,989 thousand euros
  - Note 7: Increases in tangible fixed assets (property, plant and equipment): 311 thousand euros

- **Numerator Calculation:** This corresponds to the proportion of investments in fixed assets that are part of the denominator and that are linked to assets or processes associated with eligible and aligned economic activities.

OpEx (Operating Expenses) Indicator

- **Denominator Calculation:** This includes direct, non-capitalized costs related to research and development, building renovations, short-term leases, maintenance and repairs, as well as other direct expenses related to the daily maintenance of tangible fixed assets of Soltec or a third party to whom activities are subcontracted, and which are necessary to ensure the continued and effective operation of said assets. In the case of Soltec, the accounting accounts considered are those relating to:
  - 621. Leases and royalties
  - 622. Repairs and conservation

The amounts reported for the OpEx indicator are consistent and traceable with the table included in Note 16, “Other operating expenses”, of the Consolidated Annual Accounts.

- **Numerator Calculation:** The numerator includes the operating expenses included in the denominator that meet the criteria of substantial contribution, not causing significant harm (DNSH) and Minimum Social Guarantees.

b) Eligible but not aligned activities (that fit the taxonomy, but do not contribute substantially)

Indicator for Revenue, CapEx and OpEx:

- **Denominator Calculation:** The same criteria are used as those mentioned in the section on “eligible and aligned activities (which conform to the taxonomy and are environmentally sustainable).

- **Numerator Calculation:** The portion of the numerator that is associated with eligible activities that do not meet the criteria of substantial contribution and/or not causing a significant harm (DNSH).

c) **Ineligible activities (which are not associated with activities covered by the Climate Regulation).**

Indicator for Revenue, CapEx and OpEx:

- **Denominator Calculation:** The same criteria are used as those mentioned in the section on "eligible and aligned activities (which conform to the taxonomy and are environmentally sustainable).
- **Numerator Calculation:** Part of the numerator that is associated with activities not eligible by the taxonomy, mainly associated with activities carried out by the holding companies

Contribution to multiple objectives

In compliance with section **1.2.2.2 of Annex I of Delegated Regulation (EU) 2021/2178** , it is indicated that **all economic activities identified as eligible by Soltec Power Holdings** are included in both:

- Annex **I** , relating to the **objective of mitigating climate change** , as in
- Annex **II** , relating to the **objective of adaptation to climate change** , of **Delegated Regulation (EU) 2021/2139** .

In this regard, the **economic indicators presented** in this document —relating to the proportion of turnover, investments in fixed assets (CapEx) and operating expenses (OpEx) linked to eligible activities according to the Taxonomy— **correspond to activities that can potentially contribute to both objective (a) mitigation of climate change and objective (b) adaptation to climate change** , as defined in Article 9 of **Regulation (EU) 2020/852** .

The data collected corresponds to the **2025 fiscal year** , once the classification and measurement system has been applied in accordance with the criteria of the aforementioned regulations.

Quantitative summary of economic indicators – fiscal year 2025:

Activities taxonomic	Income (Mn €)	% Total	CapEx (Mn €)	% Total	OpEx (Mn €)	% Total
0.0 Activity No eligible	-	0.00 %	0.034	0.80 %	0.836	28.18 %
3.1 Manufacturing of technologies of energy renewable	63,408	90.93 %	0.194	4.55%	0.887	29.92 %
4.1 Generation of electricity through technology solar photovoltaics	-	0.00%	3,795	89.02%	-	0.00%
7.6 Facility, maintenance and repair of technologies of energy renewable	6,326	9.07 %	0.240	5.63%	1,242	41.90%
Eligible and aligned (A1)	**69,734**	**100.00 %**	**4,229**	**99.20 %**	**2,129**	**71.82 %**
Total	**69,734**	**100.00 %**	**4,263**	**100.00 %**	**2,965**	**100.00 %**

INGRESOS	CAPEX	OPEX
100%	99,20%	71,82%
Elegible y alineado	Elegible y alineado	Elegible y alineado

Comparison of results 2025 and 2024

% of Eligibility and Alignment	% Income	% CapEx	% OpEx
2025	100%	99.20%	71.82%
2024	100%	89.91%	74.29%

In accordance with the supplementary Delegated Act on climate, based on the amendments to Delegated Regulation 2022/1214, **there is no involvement with activities related to nuclear energy or fossil gas** for the Group:

Activities related to nuclear energy and fossil gas		
Activities related to nuclear energy	**Yeah**	**No**
The company carries out, finances or has exposure to the research, development, demonstration and implementation of innovative electricity generation facilities that produce power from nuclear processes with minimal fuel cycle waste.		**X**
The company undertakes, finances or has exposure to the construction and safe operation of new nuclear facilities to produce electricity or process heat, including for district heating purposes or industrial processes such as hydrogen production, as well as their safety improvements, using the best available technologies.		**X**
The company operates, finances, or has exposure to the safe operation of existing nuclear facilities that produce electricity or process heat, including for district heating purposes or industrial processes such as the production of hydrogen from nuclear power, as well as their safety improvements.		**X**

Activities related to fossil gas	Yeah	No
The company carries out, finances or has exposure to the construction or operation of electricity generation facilities that produce electricity from gaseous fossil fuels.		X
The company carries out, finances or has exposure to the construction, renovation and operation of combined heat/cooling and electricity generation facilities that use gaseous fossil fuels.		X
The company carries out, finances or has exposure to the construction, renovation and operation of heat generation facilities that produce heat/cold from gaseous fossil fuels.		X

3. PROTECTION OF THE ENVIRONMENT AND BIODIVERSITY

In 2025, Soltec maintains its commitment to environmental protection and biodiversity as a cross-cutting theme in its operations and as a necessary condition for the sustainable development of renewable energy. In an increasingly demanding global context—marked by greater pressure on resources, intensified physical risks associated with climate change, and rising expectations from regulators, customers, financiers, and local communities—the company is reinforcing a management approach focused on preventing, minimizing, and controlling its main environmental impacts and promoting increasingly robust environmental performance throughout the life cycle of its activities.

This approach translates into the progressive integration of environmental criteria into the planning and execution of activities, with particular attention to aspects such as emissions, resource consumption, waste management, land use, and the protection of habitats and species. Soltec also promotes mitigation and adaptation measures, encouraging practices that contribute to the resilience of its operations and, where applicable, to the improvement of the environment through restoration or environmental enhancement projects. In parallel, the company continues to strengthen its measurement, monitoring, and reporting capabilities, advancing its alignment with European standards such as the ESRS, with the aim of ensuring increasingly consistent, comparable, and robust environmental information.

3.1 SOLTEC'S COMMITMENT TO THE ENVIRONMENT

Soltec Power Holdings' corporate purpose remains unchanged in 2025: "to create a cleaner, more sustainable, and fairer world through energy." This statement takes on even greater relevance in an international context marked by the acceleration of the energy transition, increasing exposure to climate risks, and the need to strengthen the resilience of the electricity system. Within this framework, respect for the environment and the preservation of biodiversity continue to be central pillars of Soltec's identity, which focuses its activity on designing and implementing solar solutions capable of contributing to decarbonization, improving project efficiency, and reducing impacts throughout the life cycle of its operations.

Aware of the potential impact of its activities and its commitment to its stakeholders—customers, investors, local communities, and public administrations—the company will strengthen its internal environmental governance mechanisms by 2025, integrating environmental criteria into decision-making and day-to-day business operations within a demanding corporate environment that requires operational discipline and maximum traceability. Key elements in this regard include the Integrated Quality, Environmental, and Occupational Health and Safety Policy, along with the environmental planning and control tools applicable to the Group's various activities. These frameworks are implemented with an approach adaptable to the specific characteristics of each project and region, based on criteria of regulatory compliance, impact prevention and minimization, resource efficiency, and environmental responsibility. Furthermore, monitoring and reporting capabilities are being strengthened to ensure increasingly consistent and comparable information.

Key Indicators	2025	2024
Greenhouse gas emissions – Scope 1 (tCO2eq)	1.018 (1)	3.804 (2)
Greenhouse gas emissions – Scope 2 (tCO2eq)	114 (1)	169 (2)
Greenhouse gas emissions – Scope 3 (tCO2eq)	7031 (3)	103.727 (4)
Electricity consumption (kWh)	680,972	979.056
Self-consumption of electricity (kWh)	78.144	19,420
Steel consumption (tons)	1,397	37,901
Steel from recycled sources (%)	20.56	27%
Aluminum consumption (tons)	3.65	24

Key Indicators	2025	2024
Water consumption (m3)	11,453	13,326
Fuel consumption (liters)	201.035	259,005
Diesel consumption (liters)	215,387	1,204,817
Production of hazardous waste (tons)	10	10
Production of non-hazardous waste (tons)	896	1.133
Recyclable Waste (tons) (5)	791	281
Recycled Waste (% of total recyclable waste)	100	100

All reported data has global reach.

(1) *Data pending verification.*

(2) *Values corrected with respect to those reported in 2024, once verified and with the FE published in 2025.*

(3) *Value taking into account 60%-70% of total Scope 3 emissions. Total Scope 3 emissions will be calculated and verified during 2026.*

(4) *Value verified, taking into account all (100%) scope 3 emissions .*

(5) *Hazardous and non-recyclable waste is sent to landfills through authorized companies.*

Environmental milestones achieved in 2025

During 2025, Soltec has consolidated significant progress in environmental performance and responsible resource management, highlighting the following milestones:

- **Carbon footprint verification (Scopes 1, 2, and 3)** in accordance with the **GHG Protocol** , reinforcing data robustness and transparency in emissions monitoring. In 2025, a reduction of over 92% was recorded, as a result of the significant decrease in activity stemming from the company's restructuring process.
- **Reduction in water consumption of 14%** , as a result of efficiency measures and operational control.
- **A 24% decrease in electricity consumption** , accompanied by an improvement in the energy mix : **self-consumption increased by 8.4%** , strengthening the contribution of internally generated energy.
- **A 72% reduction in fossil fuel consumption** , demonstrating a substantial decrease in energy dependence associated with conventional sources.
- **A 21% decrease in total waste generation** , with a particularly positive performance in recovery: **recyclable waste increased by 281%** compared to the previous year, almost tripling, reflecting a strengthening of source segregation and recycling circuits.

Environmental Challenges and Objectives 2026

In 2026, Soltec will focus its environmental agenda on consolidating the progress achieved and strengthening the implementation of efficiency and decarbonization measures, adapted to the current operational and financial context, with a particular emphasis on meeting intermediate targets. The main challenges and objectives are:

- **Decarbonization:** continue deploying and updating the **Decarbonization Plan** , prioritizing measures with greater impact and feasibility, and strengthening the monitoring of intermediate milestones.
- **Regulatory alignment and reporting** : **Consolidate alignment with ESRS** within the framework of the **CSRD** , strengthening environmental data traceability, governance, and reporting processes.
- **Circular economy** : deepening the circularity approach by improving prevention, reuse and recovery, and strengthening source segregation.
- **Operational efficiency objectives** (2026 improvement lines):
  - Reduce water consumption.
  - Reduce electricity consumption.
  - Increase energy self-consumption.
  - Reduce the consumption of (fossil) fuels and advance in alternatives when feasible.
  - Reduce total waste generation.
  - Increase the recyclable fraction and its valorization.
- **Internal culture and capabilities:** enhance and strengthen internal training in ESG, with a focus on good environmental practices.

Environmental management approach

Soltec integrates environmental management into its internal control model, with the aim of **preventing, minimizing, and controlling** the impacts associated with its activities related to the design, manufacture, and supply of solar trackers, including the operation and maintenance of photovoltaic plants. This management is structured around a focus on **regulatory compliance, operational control, and continuous improvement** , with consistent criteria applicable across the different regions in which the Group operates.

The company has an **Environmental Management System certified according to ISO 14001** , implemented in its main centers of activity in **Spain, North America, and Latin America** . This system establishes responsibilities, procedures, and controls for identifying environmental aspects, defining objectives, periodically monitoring performance, and implementing corrective and preventive actions, including maintaining evidence for audits and verifications.

The Group's environmental management framework is structured around the following elements:

- **Environmental management plans by country** , adapted to the legal and administrative requirements applicable in each jurisdiction.
- **Environmental monitoring plans** , defined based on the analysis of risks and impacts, aimed at verifying compliance with environmental conditions and detecting deviations early.
- **Integrated management system** for quality, environment and health and safety, which allows coordinated management of controls, incidents, corrective actions and audits, maintaining ISO 14001 certification.
- **Environmental impact assessment with a life cycle approach** , prioritizing impacts associated with the use of raw materials, waste generation, visual impact and emissions derived from energy consumption, in addition to the specific impacts conditioned by the site and applicable permits.
- **Periodic internal audits** , developed by the **Environment , Health and Safety (EHS) area** in centers and sites where activities are carried out, to verify the degree of implementation of the system, the effectiveness of the controls and regulatory compliance.
- **Environmental training and awareness** , aimed at employees in all areas, focused on reinforcing good practices, efficient use of resources and circular economy, supported by an internal manual of good environmental practices and internal communications.

Environmental management is based on the **Integrated Quality, Environment, and Health and Safety Policy** , which establishes the corporate principles and commitments applicable globally. Specifically, the policy incorporates the following commitments:

- **Compliance with applicable regulations and other requirements** , including regulatory, contractual and customer requirements.
- **Continuous improvement and prevention** , focused on pollution prevention and impact reduction through operational control and corrective and preventive actions.
- **Responsible management of impacts and efficient use of resources** , promoting efficiency in raw materials, energy and natural resources.
- **Protection of biodiversity** , through measures to avoid, mitigate and, where appropriate, compensate for impacts on ecosystems in the environments where the activity takes place.
- **Quality of service and customer satisfaction** , incorporating environmental and safety criteria in the provision of services.
- **Proactive relationship with stakeholders** , fostering continuous communication with customers, suppliers, employees and other interest groups.
- **Training and awareness** , through continuous training and awareness programs in quality, environment and safety.

- **Internal participation in safety and health** , establishing mechanisms that favor the contribution of workers to the continuous improvement of safety and health conditions.

In relation to the **precautionary principle** , Soltec applies a preventive approach in all its operations, especially regarding environmental impact and the protection of biodiversity. The company's activities, in their current state, do not generate impacts that could lead to serious or irreversible damage to the environment and biodiversity.

During the last five fiscal years, Soltec has not received any significant fines or penalties related to environmental or ecological issues. For the purposes of this report, the company considers any penalty equal to or greater than €10,000 to be significant.

3.2 CLIMATE CHANGE

Greenhouse Gas (GHG) Emissions

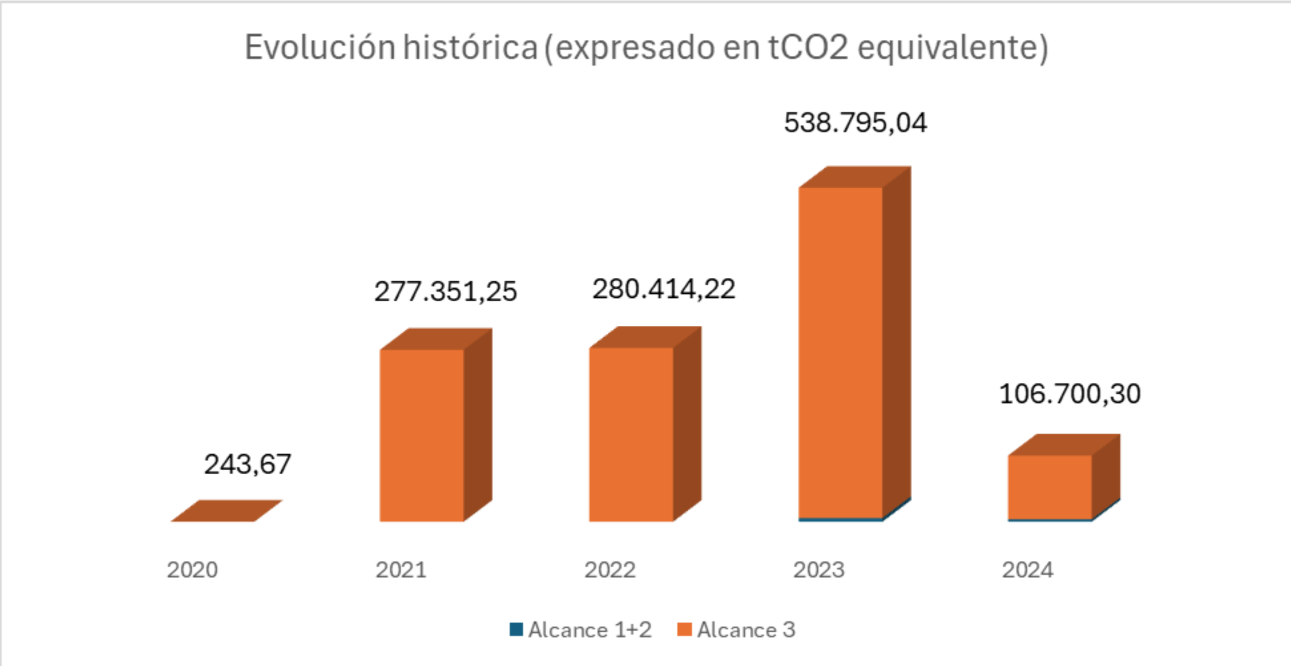
Each year, Soltec calculates and publishes its carbon footprint data in its Integrated Annual Report and on its website, endorsed by the ISO 14064 standard and the GHG Protocol framework .

Over the years, the company has established a continuous improvement process through which it evolves and deepens its carbon footprint calculation each year:

- 2016 was the first year that Soltec calculated its Carbon footprint, but only for its Headquarters located in Molina de Segura and for scopes 1 and 2.
- 2020 was the first year in which Soltec began calculating scope 3, although it could only include information related to business travel.
- For the 2021 calculation, the first calculation was made with the complete Carbon Footprint of the organization (scopes 1, 2 and 3), although without including information from subsidiaries outside of Spain.
- With the 2022 calculation, Soltec took the opportunity to publish according to the ISO 14064 measurement system and the GHG Protocol .
- In 2023, Soltec managed to calculate the carbon footprint of the entire organization (including subsidiaries), finalizing the calculations and verification in June 2024 according to the GHG Protocol measurement system .

- In 2024, Soltec continued calculating the carbon footprint of the entire organization (including subsidiaries). The calculations were verified by an external entity in October 2025 according to the GHG Protocol.

- Regarding the 2025 fiscal year, as of the date of this report, Soltec is in the process of calculating its organizational carbon footprint, having already calculated approximately 60-70% of its emissions. The organization's most significant emission sources have been calculated, including raw material purchases (steel, gearboxes, motors, aluminum, batteries, and electrical and electronic components), business travel, waste, T&D losses, and end-of-life product disposal. Scope 1 and 2 emissions for the entire organization are also available. Verification of this footprint is planned for 2026, once the emission factors are published.



Historical evolution of verified emissions (*expressed in tCO2 equivalents)*

The graph reflects an irregular historical evolution of the carbon footprint (tCO_2e), with a very significant jump between 2022 and 2023 (to 538,795.04 tCO_2e) and a sharp decrease in 2024 (to 106,700.30 tCO_2e). Throughout the period, the main contribution corresponds to scope 3, consistent with an industrial and supply chain business model, while scopes 1 and 2 maintain a comparatively smaller contribution.

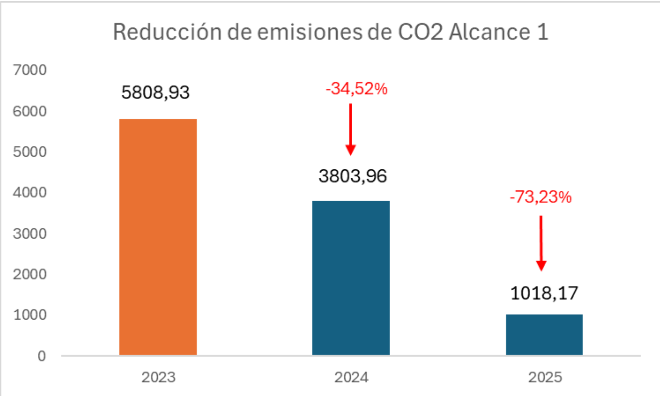
The increase in 2023 is mainly due to steel procurement for projects to be executed in 2024. The decrease in 2024 is explained by the previous year's procurement and the company's situation and the resulting reduction in activity/operating volume, which directly impacts indirect emissions associated with purchasing, logistics, travel, and other Scope 3 components. In this context, and given that 2025 will continue to be conditioned by the same adjustment dynamics, the downward trend observed in 2024 is expected to continue throughout 2025.

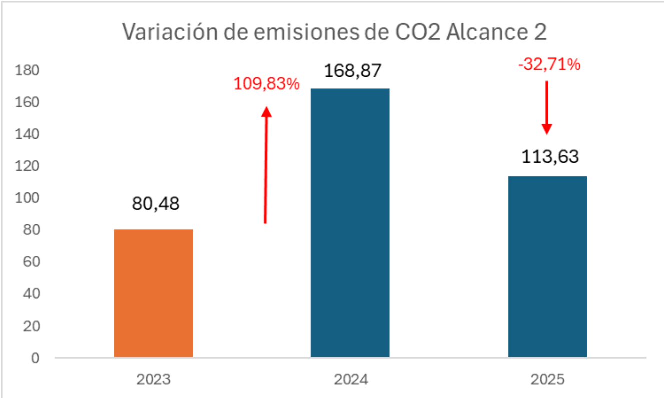
2023, the base year for our Decarbonization Plan

Since 2023 was the first year in which Soltec calculated its emissions for 100% of its operations, it was decided to use that year as the basis for the group's Decarbonization Plan.

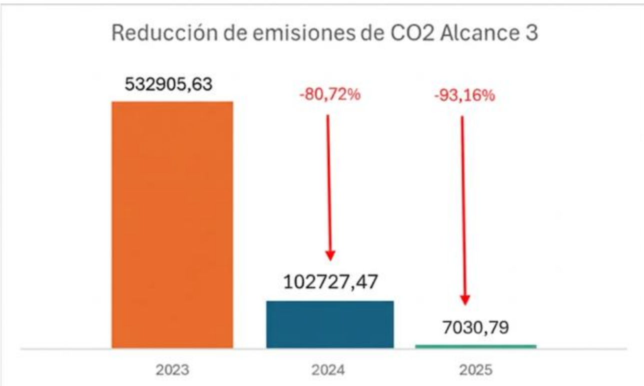
- 5,808.96 tons of CO_2 equivalent in direct **Scope 1** emissions , representing 1.08% of the total inventory. The largest sources of emissions came from mobile combustion (both diesel and fuel in machinery). For 2024 **, direct Scope 1** emissions were 3,803.96 tons of CO_2 equivalent, representing a reduction of 34.52%. % compared to the previous year . For the **2025 fiscal year,** pending verification, **Scope 1 emissions** amount to 1,018.17 t of CO_2 equivalent, representing an 82.5% reduction compared to the base year and a 73.23% reduction compared to 2024.

- Regarding **Scope 2 emissions** , in **2023** they reached 80.48 t CO_2 equivalent and represented 0.01% of the total inventory. These emissions came from the energy consumption of our facilities at the company's various locations. In **2024, Scope 2** emissions were 204.96 t CO_2 equivalent, representing an increase of 109.8% compared to the baseline year. In **2025** , Scope 2 emissions **,** which are pending verification, amount to 113.63 t CO_2 equivalent , representing an increase of 41.19% compared to the baseline year, but a decrease of 32.71% compared to 2024. At company locations where electricity is not billed (because it is included in a contract), emissions were calculated based on the square meters of occupied space.





- **Scope 3** emissions sources for **2023** were categorized according to the different categories established by the GHG Protocol methodology, reaching a total of 532,905.63 t of CO_2 equivalent. This figure represents 98.91% % of Soltec's total Greenhouse Gas Emissions Inventory. The company focuses its reduction and improvement efforts on those categories that account for more than 1%. % of total emissions. Among them, the category of " Goods and services purchased " is the most significant source of emissions , with the purchase of primary and secondary steel standing out as the main contributor to this impact. In **2024,** emissions Scope **3** emissions amounted to 102,727.47 t CO_2 equivalent, with emissions from steel purchases totaling 64,995.99 t CO_2 equivalent. This represents a significant reduction of 80.72% of total emissions compared to the baseline year, primarily due to decreased steel purchases in 2024. In 2025, **calculated Scope 3** emissions , pending verification, amount to 7,030.79 t CO_2 equivalent. Emissions from steel purchases account for 31.58% of total Scope 3 emissions.

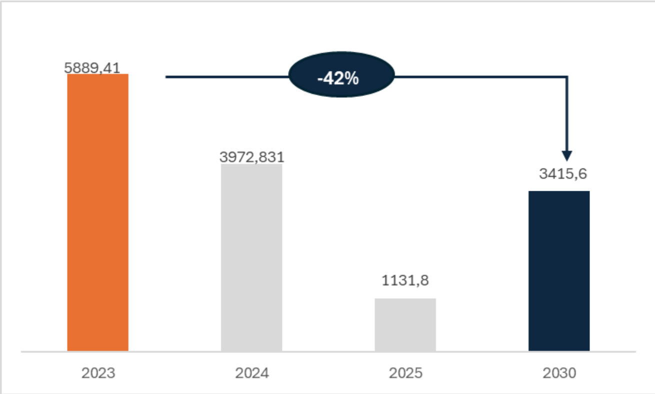


Reduction targets until 2030:

Using the 2023 Carbon Footprint as a basis for calculation, and applying science-based criteria (SBT), our decarbonization targets are:

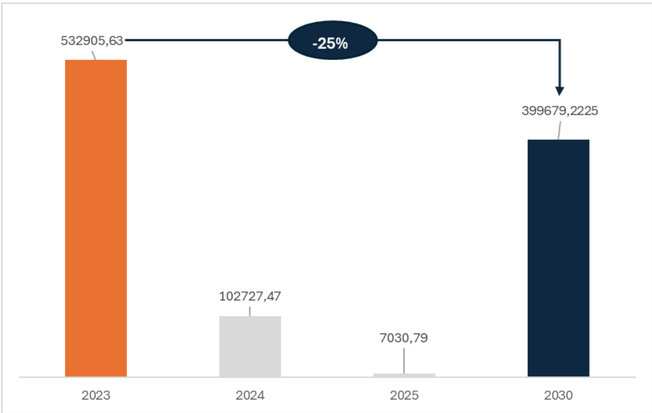
Scopes 1 and 2:

Regarding Scopes **1 and 2** of the company, and recording the data obtained in our 2023 Carbon Footprint, we obtain, following the SBTi criteria of staying below 1.5ºC, an **ABSOLUTE reduction target of 42%** for both scopes in 2030.



Scope 3:

Considering the absolute emissions in the base year 2023 of 532,905.63 tons of CO2e, the **ABSOLUTE reduction target of 25%** for the year 2030 implies reducing these emissions to 399,673.22 tons of CO2e, complying with a scenario of limiting global warming to below 2°C.



2040 reduction targets:

Within the framework of its Decarbonization Plan, Soltec has established an interim climate target to 2040 that reinforces its commitment to the transition to a low-carbon economy and its progress towards net zero emissions.

Using 2023 as a baseline year—the first year with verified global carbon footprint—the company recorded 5,889.44 t of CO_2 equivalent in Scopes 1 and 2 and 532,905.63 t of CO_2 equivalent in Scope 3. Based on this, Soltec states:

- **Reduce absolute Scope 1 and 2 emissions by at least 90% by 2040** , to around **588.94 t CO_2 equivalent** , through the electrification of equipment, the replacement of fossil fuels, and the use of renewable energy. This target is consistent with a pathway aligned with the **1.5°C scenario** .

- **Reduce absolute Scope 3 emissions by between 50% and 60%** , to an estimated range of between **266,452.82 and 213,162.25 t of CO_2 equivalent** , by promoting the decarbonization of the supply chain, the use of materials with a lower emission factor and the optimization of logistics.

Comparability Context 2024–2025: Fiscal years 2024 and 2025 show anomalous emissions performance due to the extraordinary situation experienced by the company and the restructuring and adjustment process. During this period, the reduction in operating volume and certain supply chain flows has had a direct impact on emissions levels, particularly Scope 3. Looking ahead to the coming fiscal years, a gradual recovery of activity towards normalized levels is expected, which will foreseeably lead to an increase in emissions compared to 2024 and 2025. However, Soltec will maintain its climate management discipline and the Decarbonization Plan roadmap to ensure compliance with the established objectives, decoupling activity growth from the proportional increase in emissions through structural reduction measures.

Taken together, this commitment would prevent more than 300,000 tons of CO_2 equivalent compared to the baseline year, ensuring an ambitious and technically feasible climate transition, aligned with the criteria of Science. Based Targets initiative (SBTi). Soltec will periodically review these targets to ensure progress towards net zero before 2050.

Positive Impact and Vision for the Future

In a particularly demanding market and financing context, Soltec reaffirms in 2025 its commitment to a business model oriented towards sustainable growth, based on operational efficiency, technological innovation and the integration of environmental respect into management.

Following the financial difficulties experienced in 2024 and their continuation in 2025, the company maintains a medium- and long-term vision focused on preserving its competitiveness in the photovoltaic sector and strengthening its value proposition through differentiated technological solutions. In this regard, Soltec's solar tracking technology allows for the dynamic orientation of modules according to the sun's path, optimizing production per installed area and contributing to a reduction in the levelized cost of energy (LCOE), as well as the emissions associated with electricity generation.

Looking ahead to the coming years, Soltec will continue to prioritize selective investments with tangible returns, focused on efficiency, sustainability and product reliability, with the aim of ensuring the long-term viability of the Group and maximizing its effective contribution to the energy transition.

In parallel, and consistent with its continuous improvement approach, Soltec maintains its environmental control and management systems operational in all phases linked to its activity —production, storage, transport and O&M—, preserving environmental performance standards even in an operational adjustment scenario.

Soltec continues to incorporate Solhub , its proprietary logistics and warehousing solution designed to ensure on-time delivery. This system strengthens component traceability and facilitates systematic monitoring of relevant environmental aspects, including tracking emissions associated with logistics and waste management, in line with the principles of environmental responsibility and operational efficiency.

Throughout 2025, the company will continue to implement measures to minimize its significant environmental impacts, with particular attention to reducing emissions associated with transportation and steel procurement, a major source of carbon footprint in the supply chain. At the operational level, responsible purchasing criteria are being strengthened to reduce embodied emissions in materials, prioritizing, where feasible, suppliers with greater environmental traceability, optimizing logistics (reducing routes and empty loads), and implementing transportation efficiency measures, as well as analyzing alternative supply sources that contribute to reducing the carbon intensity of the steel purchased.

Regarding the use of industrial gases, Soltec does not use gases in its production process, limiting their use to the air conditioning systems of its facilities. The equipment undergoes regular inspections and is managed according to the principles of the ISO 14001-based environmental management system implemented in the Group's main facilities. Furthermore, a proactive approach to leak control and responsible refrigerant management is maintained. No refrigerant recharges took place during 2025.

In ongoing projects, specific measures are maintained for the control of acoustic impact, among which the following stand out:

- verification of manufacturers' certificates of conformity;
- use of low noise level equipment (e.g., compressors and pile drivers);
- periodic noise level measurements where appropriate;
- regular machinery inspections and preventive maintenance.

These actions allow us to maintain consistent environmental performance in line with best industry practices, reinforcing Soltec's commitment to responsible management aligned with international benchmark standards.

3.3 ENERGY SUSTAINABILITY AND THE FIGHT AGAINST CLIMATE CHANGE

Soltec maintains a fully implemented, comprehensive approach to energy sustainability and combating climate change, integrating energy efficiency and emissions reduction as structural drivers of its operational management. This model is supported by an existing framework of policies, objectives, and controls, geared towards the continuous improvement of energy performance and data-driven decision-making.

Within this framework, the company has implemented energy efficiency measures in its facilities (optimized climate control, consumption monitoring, and technological upgrades), as well as established initiatives for the dematerialization of processes and internal communications to reduce indirect consumption. Furthermore, self-consumption is in place at its headquarters , which in 2025 accounted for **14.21%** of total energy consumption, reinforcing the organization's direct contribution to the use of renewable energy sources.

In addition, Soltec has a structured carbon footprint reduction plan and periodic emissions monitoring mechanisms, which allow for identifying reduction opportunities, prioritizing actions, and ensuring regulatory compliance.

In terms of mobility and operations, measures to optimize travel and promote collective transport remain in place, prioritizing, whenever technically and operationally feasible, the rental of hybrid or electric vehicles and machinery, with the aim of reducing the consumption of fossil fuels and associated emissions.

In addition, the installed electric charging infrastructure remains operational, consisting of 47 charging points for vehicles and 10 points for motorcycles, free for the use of staff, contributing to facilitating the electrification of mobility associated with corporate activities.

This set of actions consolidates an energy performance consistent with the Group's environmental strategy and allows for sustained progress in efficiency and decarbonization, even in a demanding operating environment.

3.4 RESPONSIBLE USE OF RESOURCES AND CIRCULAR ECONOMY

The traditional linear economic model—based on extraction, manufacturing, use, and disposal—has shown its limitations in the face of resource depletion and increasing environmental impacts, especially those associated with fossil fuels and waste generation. In this context, Soltec maintains and strengthens its circular economy approach as a key element for improving material efficiency, reducing waste, and minimizing impacts throughout the life cycle of its products and operations.

In line with its Integrated Quality, Environmental, and Occupational Health and Safety Policy, the company is consolidating a circular management system for the waste generated throughout its operations and promoting the involvement of its internal and external stakeholders. This approach is implemented through preventive measures (reduction at source), reuse, and recovery, prioritizing recovery and recycling over disposal whenever feasible.

As part of this strategy, Soltec maintains an internal donation and reuse program for discarded materials, aimed at giving a second life to certain items in good condition that would otherwise be managed as waste. This system facilitates reuse for non-industrial purposes by staff, contributing to waste reduction at the source and more efficient use of available resources.

The company uses a standardized methodology for comprehensive waste management, which is communicated to all personnel involved and reinforced through regular training sessions for employees and contractors. These training sessions consolidate best practices and ensure proper segregation to maximize recovery and recycling. The waste generated is mostly non-hazardous (plastic, paper/cardboard, wood, and metal) related to office, logistics, manufacturing, installation, and maintenance activities. To a lesser extent, hazardous waste (oils, absorbents, contaminated containers) is generated and managed in accordance with current regulations and by authorized waste management companies.

Soltec believes that the principles of circularity should be integrated across its operations and value chain. Therefore, it promotes responsible production practices, minimizing waste generation and the consumption of raw materials, energy, and water, and advancing environmental criteria in purchasing, logistics, and design.

Main measures implemented

- **Extended life cycle of the solar tracker** , designed for an estimated lifespan of up to 40 years, with a high percentage of potentially recyclable materials at the end of its use.
- **Reuse and revaluation of materials in situ** , when technically feasible, as functional elements within the facility or, where appropriate, as supports for local biodiversity.
- **Promoting the use of recycled raw materials** , including the use of steel with recycled content in structural components, where applicable.
- **Selection and evaluation of suppliers** through homologation processes that incorporate environmental and traceability criteria.
- **Logistics optimization and production close to the project** when feasible, to reduce transport and associated emissions.
- **Reducing the use of plastics** in packaging and components, replacing them with more recyclable materials (e.g., aluminum) where possible.
- **Gradual elimination of single-use plastics** in project environments and auxiliary activities.

All Soltec projects include waste measurement, control, and reporting systems, allowing for monitoring of waste evolution and the identification of improvement actions. Waste is labeled and stored in designated and marked areas according to type and volume. The Health, Safety, and Environment department conducts regular inspections to verify regulatory compliance and identify opportunities for improvement in internal management. In Spain, workplaces maintain the corresponding records as waste producers with the competent environmental authority, and this level of compliance is replicated in the countries where the Group operates, in accordance with applicable local regulations.

Waste recyclables	2025	2024
Metal (Steel) (tons)	257	20
Paper-Cardboard (tons)	82	49
Plastic (tons)	46	30
Wood (tons)	341	170
Photovoltaic panels and electronic waste (tons)	64	13
Total recycled (%)	100	100

Throughout 2025, Soltec maintains its commitment to continuous improvement in waste management, strengthening traceability, source segregation, and the recovery of recyclable fractions. Data shows an increase in the volumes managed for recycling in the main fractions, in line with the greater degree of control and record-keeping, progress in the management of end-of-life materials, and the consolidation of operational practices geared towards circularity. In particular, the increase in metal (steel) and wood stands out, as well as the growth in the fraction of photovoltaic panels and electronic waste, associated with a more systematic approach to their identification and channeling to authorized waste management companies.

Overall, waste management in 2025 is considered consistent with the Group's circular economy approach, ensuring the recovery of 100% of reported recyclable waste and consolidating preventive and reuse measures that reduce waste generation and improve resource efficiency.

Responsible Water Management

In line with its commitment to sustainability and the protection of natural resources, Soltec maintains efficient and responsible water management in all its operations. The Environment , Health and Safety (EHS) department implements measures aimed at optimizing water use, preventing its degradation, and avoiding unnecessary consumption, integrating water monitoring within the Group's environmental control systems.

The company monitors the volume of water consumed on a monthly basis, which allows it to identify trends, assess water intensity based on the activity carried out, and define improvement actions when appropriate.

During the 2025 fiscal year, total water consumption amounted to **11,453 m^3** , representing a **14% reduction compared to 2024** (13,326 m^3). This volume is broken down as follows:

- **9,760 m^3 of non-potable water** , primarily used for dust mitigation in construction projects, helping to minimize the environmental impact on construction sites. This represents a **9.7% reduction** compared to the previous year (10,804 m^3 in 2024).
- **1,693 m^3 of potable water** , intended for human consumption in offices and operational facilities. This represents a **33% reduction** compared to the previous year (2,522 m^3 in 2024).

These data reflect a significant improvement in both total consumption and differentiated management by type, demonstrating a more efficient use of resources and operational optimization on construction sites and in corporate facilities.

Soltec does not use water in its manufacturing processes, so virtually all consumption is linked to auxiliary activities or environmental mitigation measures. In the case of non-potable water used for dust control, all collection points have the required permits granted by the competent environmental authority in each territory, guaranteeing regulatory compliance and traceability in its use.

The progress recorded in 2025 consolidates a positive trend in the Group's water management, characterized by reduced consumption, the responsible use of non-potable water sources for technical purposes, and strict regulatory compliance. This efficient water management reinforces Soltec's commitment to protecting natural resources in a global context of increasing water stress.

Efficient consumption of materials

Soltec integrates the efficient and responsible consumption of materials as a structural axis in the design, manufacture and installation of its solutions, prioritizing the reduction of environmental impact, the use of materials with a smaller footprint and the incorporation of circular economy principles throughout the entire value chain.

The design processes of solar trackers are geared towards optimizing the use of resources, promoting the reuse and recyclability of components and extending the useful life of the equipment, thus contributing to reducing the environmental footprint associated with the manufacture and life cycle of the product.

In the industrial sector, the company promotes the use of recycled raw materials—with particular emphasis on steel—and the gradual replacement of materials or configurations with alternatives that offer better environmental performance. Steel is Soltec's primary raw material and is mainly used in the manufacture of pile drivers, structural tubes, and module supports.

During 2025, total steel consumption decreased significantly compared to 2024, consistent with the lower volume of industrial and manufacturing activity associated with the year's operating context. At the same time, Soltec continues to integrate circularity criteria into the purchase and use of materials, incorporating recycled steel whenever technically and logistically feasible.

Main Indicators	2025	2024
Steel consumption (t)	1,397	37,901
Percentage of recycled steel out of the total (%)	20.55	27

The value of steel consumption in 2025 decreased considerably due to the limited activity at Soltec due to the restructuring process.

Additionally, Soltec maintains the process of replacing lead-acid batteries with lithium-ion batteries in new projects, based on environmental and operational criteria:

- One lithium battery can replace two lead-acid batteries in terms of supply capacity;
- its estimated useful life is longer (≈10 years versus ≈5 years);
- require less volume and maintenance;
- They offer better conditions for end-of-life management, promoting recyclability.

Currently, **100% of new projects** incorporate lithium batteries, reinforcing the company's commitment to material efficiency, technological sustainability and the reduction of impacts associated with the maintenance and replacement of components.

Soltec's operations take place in corporate offices, logistics centers, and photovoltaic projects, where food consumption is exclusively for individual employee use. The company does not manage food services, cafeterias, kitchens, or any collective services that could lead to food waste. For this reason, the organization does not have specific food waste prevention programs, as the generation of this type of waste is minimal or nonexistent and is not part of its value chain. However, proper waste segregation through available recycling systems is generally promoted in the workplace.

3.5 BIODIVERSITY PROTECTION

Soltec's Environmental Management Plan is a key operational tool for integrating environmental considerations into the design, execution, and monitoring of photovoltaic projects. It ensures that activities associated with the company's products and solutions are carried out according to criteria of prevention, impact minimization, and regulatory compliance. Its application is tailored to the characteristics of each site and project phase, incorporating environmental requirements from the planning stage through to the construction phase and, where applicable, to the operation and maintenance phase.

The plan specifically addresses the identification and control of potential impacts on flora, fauna, soil, water, landscape, and other elements of the natural environment. For projects located outside established industrial areas or in environmentally sensitive environments, preventive, corrective, and, where applicable, compensatory measures are established to ensure effective biodiversity protection. These measures include environmental monitoring protocols, waste and soil management, dust and noise control, and habitat and species protection measures.

Soltec possesses specialized technical capabilities for the development and implementation of environmental management tools associated with projects, including support for impact assessments, the design of avoidance and mitigation measures, and the monitoring of their effectiveness through verifiable controls and evidence. These actions are carried out before work begins and are updated during execution, reinforcing continuous improvement in environmental management and the proactive management of risks associated with biodiversity.

Furthermore, the company's Integrated Quality, Environment and Occupational Health and Safety Policy outlines its commitment to:

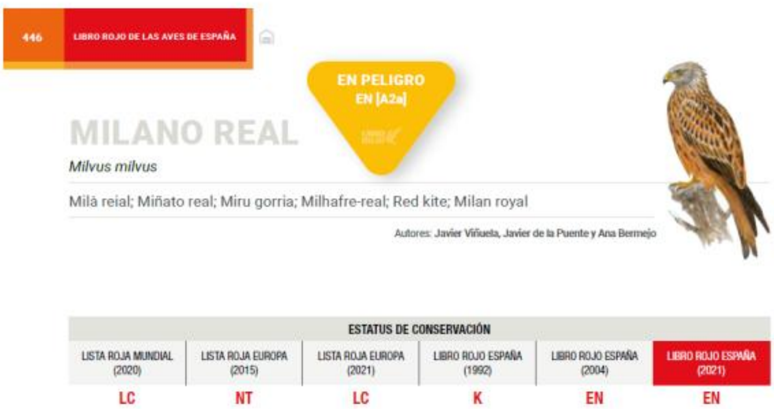
- The protection of biodiversity and the ecosystems in which it carries out its activity.
- No deforestation in its operations and supply chain, in accordance with applicable requirements.
- The prevention of damage and deterioration of the natural environment.
- Promoting good environmental practices among business partners and stakeholders.

Key actions for biodiversity conservation include the implementation of specific measures tailored to the environment and the type of impact identified, with actions focused on the fauna, flora, and ecological values of the site. These measures are applied preventively and correctively in projects where a significant potential environmental impact is identified, helping to mitigate risks, ensure compliance with the project's environmental obligations, and promote the compatibility of infrastructure with the natural environment.

Actions concerning wildlife

Soltec applies specific measures aimed at protecting wildlife in the different phases of the project, prioritizing a preventative approach and adapting actions to the environmental sensitivity of the site. The main measures implemented include:

- **Preventive planning** of activities to avoid alteration, fragmentation of habitats or displacement of species.
- **Installation of game fences** with high visibility elements (e.g., reflective sheets) to reduce the risk of bird collisions and improve the permeability and safety of the environment where appropriate.
- **Prior surveys** to detect nests, burrows, shelters or breeding areas, activating protection, marking and, where appropriate, rescue protocols in accordance with applicable regulations.
- **Monitoring of birdlife** during the construction phase, with records and corrective measures in case of incidents.
- **Construction of artificial shelters** using natural materials and/or plant remains from the construction site, when appropriate and compatible with the environment.
- **Identification and study of wildlife** , and, if required, **relocation** under technical criteria and with specialized supervision, guaranteeing animal welfare and regulatory compliance.
- **Specific signage on construction sites** regarding fire risk and the presence of wildlife, reinforcing preventive measures and good practices.
- **Information and training** for construction personnel on protected or sensitive species, applicable restrictions and protocols for action in the event of sightings or findings.



446 LIBRO ROJO DE LAS AVES DE ESPAÑA

EN PELIGRO
EN [A2a]

MILANO REAL

Milvus milvus

Milà reial; Miñato real; Miru gorria; Milhafre-real; Red kite; Milan royal

Autores: Javier Viñuela, Javier de la Puente y Ana Bermejo

ESTATUS DE CONSERVACIÓN					
LISTA ROJA MUNDIAL (2020)	LISTA ROJA EUROPA (2015)	LISTA ROJA EUROPA (2021)	LIBRO ROJO ESPAÑA (1992)	LIBRO ROJO ESPAÑA (2004)	LIBRO ROJO ESPAÑA (2021)
LC	NT	LC	K	EN	EN

Actions on flora

Soltec implements specific measures to minimize impacts on vegetation and promote the conservation of the area's botanical values, applying a preventative approach from the planning stage through project execution. Key actions include:

- **Preventive planning** of activities to reduce occupancy and avoid unnecessary impacts on the vegetation cover.
- **Delimitation and marking** of the action areas (including access, authorized stockpiles and auxiliary areas) to avoid impacts outside the defined perimeter.
- **Dust control** through targeted and controlled irrigation when there is a risk of deposition on adjacent vegetation, prioritizing water use efficiency criteria.
- **Express prohibition** of stockpiling of materials, parking or unauthorized transit in areas with natural or sensitive vegetation.
- **Sustainable management of vegetation cover** through **grazing with sheep** where feasible, reducing the use of mechanical means and avoiding herbicides, while improving the environmental integration of the project.
- **Restriction of the use of herbicides and pesticides** , strictly limiting it to authorized areas and in accordance with the environmental conditions of the project; **prohibition** outside the permitted area.
- **Preventive measures against fires** , including the availability of extinguishing equipment in operational areas and the implementation of good practices to reduce the risk of ignition.
- **Protection and, where appropriate, rehabilitation of ecological corridors** when the works may interfere with them, restoring connectivity and environmental conditions according to technical criteria.

Protection of ecological heritage

Soltec incorporates specific measures to preserve the ecological values of the environment and avoid impacts on sensitive areas, especially in projects located in protected environments or with natural features of interest. The main actions include:

- **Planning of the work** to minimize occupation and reduce as much as possible the impact on areas of ecological interest, sensitive habitats or adjacent natural areas.
- **Physical protection** of areas identified as sensitive through signage, temporary fencing or other isolation measures, preventing unauthorized access and alterations to the environment.
- **Specific monitoring of earthworks** in vulnerable environments, applying controls to prevent erosion, runoff, compaction and damage to elements of ecological value.

- **Prior collection of information** from competent bodies and comparison with applicable environmental maps; **signage and delimitation** of sensitive areas and **restriction of the transit** of heavy machinery and auxiliary activities outside the authorized perimeter.

4. SOCIAL COMMITMENT, PEOPLE AND RELATIONSHIP WITH STAKEHOLDERS

4.1 STAKEHOLDER RELATIONSHIP MODEL

In 2025, Soltec reaffirms that its relationship with stakeholders is a structural pillar of its responsible management model and a critical element for advancing towards solid, credible sustainability aligned with the company's current context. In a year marked by the ongoing financial stabilization process, adaptation to the new European regulatory framework (CSRD/ESRS), and a demanding sector environment, active dialogue with stakeholders has taken on an even more strategic character.

Throughout 2025, the company strengthened its **active and bidirectional listening mechanisms** , integrating them into key processes such as dual materiality analysis, ESG risk management, supplier qualification, relationships with financial institutions, and monitoring of ongoing projects. This approach allows the company to identify emerging risks, anticipate regulatory and market expectations, and define responses aligned with criteria for sustainability, resilience, and long-term value creation.

In a context where investors, customers, employees, suppliers and public administrations exert a growing influence on strategy and non-financial performance, Soltec prioritizes relationships based on **transparency, ethics, consistency and accountability** , reinforcing institutional credibility at a particularly relevant time for the organization.

With the aim of consolidating the creation of shared value, Soltec keeps its stakeholder map up to date, identifying and prioritizing stakeholders based on their level of influence on the company and the impact that the Group's activities have on each of them. This analysis, reviewed in 2025 as part of the dual materiality process, allows for the definition of specific communication channels, the establishment of monitoring mechanisms, and ensures structured and traceable dialogue.

The following table lists the main stakeholder groups, the most relevant aspects of their relationship with Soltec in 2025, and the communication channels established to maintain a continuous, bidirectional, and transparent dialogue.

Categories general stakeholder groups	Main points of interest that this cluster has in relationship with the company	Existing communication channels with he Cluster of interest	
Society	■ Local job creation and economic stability ■ Business ethics, regulatory compliance and transparency ■ Sustainable products and solutions ■ Contribution to the energy transition ■ Relationship with local communities ■ Efficient use of resources and environmental performance ■ Corporate volunteering and social commitment	■ Conferences ■ Media ■ Meetings with local representatives	**Social networks:** ■ LinkedIn ■ Instagram ■ YouTube **Web page corporate common for everyone.**
Customers	■ Development of efficient and sustainable technological solutions ■ Product quality and operational reliability ■ Commitment to delivery deadlines and after-sales service ■ Competitive quality-price ratio. Regulatory compliance and ethics in the business relationship. ■ Adaptation to safety and sustainability standards in projects ■ Transparency in contractual and technical conditions ■ Financial strength and continuity as a strategic partner	■ Trade fairs and conferences ■ Media ■ System of Tour	
Market financial	■ Clear, truthful and up-to-date economic information ■ Transparency in risk management and decision-making ■ Evidence of a realistic and sustainable financial strategy ■ Operational strength and cash generation capacity ■ Commitment to legality, ethics, and good governance ■ Regulatory compliance (CNMV, ESRS, EU Taxonomy, etc.) ■ Effective integration of ESG criteria into the business model ■ Commitment to environmental sustainability and the energy transition	■ Shareholders' Meeting ■ Shareholder/Investor Attention ■ Corporate meetings access ■ Communications to the CNMV ■ Media	

<table>
<tr><th>Categories general stakeholder groups</th><th>Main points of interest that this cluster has in relationship with the company</th><th colspan="2">Existing communication channels with he Cluster of interest</th></tr>
<tr><td>Suppliers</td><td>
- Commitment to a stable and transparent business relationship
- Clarity in contracting conditions and payment compliance
- Efficiency in supply chain planning and execution
- Integration of sustainability criteria into products and processes
- Rigorous quality control of materials and components
- Ethical, regulatory and contractual compliance in the business relationship
- Prioritizing responsible and certified suppliers
- Technical and operational collaboration for cost optimization</td><td>
- GoSupply
- SERES Platform
- Media
- Formations</td><td rowspan="3">Social networks:
- LinkedIn
- Instagram
- YouTube

Web page corporate common for everyone.</td></tr>
<tr><td>Regulator</td><td>
- Strict compliance with applicable national and international regulations
- Transparency in financial, non-financial and sustainability information
- Active and diligent collaboration with regulatory authorities
- Ethical, responsible behavior aligned with the public interest
- Commitment to sustainability standards (ESRS, Taxonomy, GRI, TCFD)
- Prevention of legal, tax, criminal and environmental risks
- Reliability in traceability and reporting of relevant data</td><td>
- CNMV (Submissions of privileged information or other relevant information)
- Media</td></tr>
<tr><td>Employees</td><td>
- Clear, transparent and accessible internal communication
- Job stability and clarity in organizational evolution
- Continuing education adapted to new challenges and technologies
- Availability of adequate resources for professional performance
- Work-life balance
- Equal opportunities, inclusion and respect for diversity
- Safety and health in the workplace
- Recognition of effort and maintenance of corporate commitment</td><td>
- Formal and informal meetings
- Internal communication channels
- Jira System
- Media
- Formations
- Inquiry channel</td></tr>
</table>

4.2 HUMAN RIGHTS

In a context of increasing social and regulatory demands, and in a business environment shaped by restructuring and financial difficulties, Soltec continues to consider **human rights** a strategic pillar of its sustainability and governance model. The company reaffirms its commitment to respecting and promoting fundamental rights in its operations and throughout its value chain, fostering responsible and consistent practices that meet the expectations of its stakeholders.

Throughout 2025, Soltec maintained its Human Rights Policy, approved by the Board of Directors, which remains in effect and operational. This policy continues to serve as the framework for due diligence across all Group companies and guides relationships with employees, suppliers, business partners, customers, and local communities. This commitment is complemented by internal measures aimed at preventing negative impacts, promoting responsible practices, and strengthening transparency in corporate processes and relationships.

The policy is aligned with the following international frameworks:

- The United Nations Guiding Principles on Business and Human Rights.
- The OECD Guidelines for Multinational Enterprises.
- The principles of the United Nations Global Compact.
- The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- The fundamental conventions of the International Labour Organization (including Convention 169).
- The United Nations Sustainable Development Goals (SDGs).
- The Group's Code of Conduct and Compliance Program.

Additionally, this framework is reinforced through the responsible purchasing policy, internal social policies, and the privacy and personal data protection policy.

Soltec remains committed to promoting human rights-respecting practices in all territories where it operates, fostering transparent, equitable and respectful relationships with all its stakeholders, and advancing the continuous improvement of its internal mechanisms for the prevention and management of associated risks.

Employees

Soltec maintains a firm commitment to protecting and promoting the rights of all individuals within its organization, considering its human resources as an essential pillar for the company's sustainability and competitiveness. To this end, it has an internal regulatory framework comprised of corporate policies, specific procedures, and a Code of Conduct that reinforce a culture of respect, fairness, and integrity in the workplace.

Within the framework of this commitment, Soltec respects and actively promotes the following fundamental rights:

- **Freedom of opinion, expression and information** , guaranteeing an environment that fosters dialogue, active listening and diversity of thought.
- **Freedom of association, collective bargaining** , recognizing the role of legal representation of workers and the right to participate in social dialogue processes.
- **Absolute rejection of child labor, forced labor or any form of modern slavery** , both in its own operations and in the supply chain, promoting responsible practices among its suppliers.
- **Right to privacy and protection of personal data** , in accordance with applicable regulations and internal information security standards.
- **Safe and healthy work environment** , in line with the commitments made by the company regarding occupational risk prevention and occupational well-being.
- **Decent working conditions** that ensure adequate remuneration, equal opportunities and non-discrimination on the grounds of gender, ethnicity, age, religion, sexual orientation, disability or other personal or social condition.
- **A work environment free from harassment** , ensuring that any conduct contrary to the dignity of individuals is addressed through established internal channels with full confidentiality, diligence and speed, in accordance with current protocols.

Likewise, Soltec promotes that all employees, within their scope of action and responsibility, respect and disseminate the principles of human rights, actively contributing to the fulfillment of the commitments acquired by the company in this matter.

Suppliers

Soltec is reinforcing its commitment to protecting and promoting human rights throughout its entire value chain, encouraging suppliers, contractors, and employees to adopt practices consistent with the UN Guiding Principles on Business and Human Rights and the ILO's fundamental labor standards. The company expects its suppliers to strictly respect the human rights recognized in applicable national and international legislation in the countries where they operate, as well as to comply with current labor laws and due diligence principles.

Throughout 2025, Soltec continued to strengthen its supplier assessment, certification, and monitoring mechanisms, more systematically integrating ESG criteria that include specific human rights risk analysis. This approach, based on a preventive assessment proportionate to the level of risk, allows for the identification of potential adverse impacts—such as discrimination, precarious employment, restrictions on freedom of association, child labor, or forced labor—and the activation of mitigation measures, monitoring, and, where appropriate, improvement plans.

Soltec also encourages its suppliers to voluntarily adhere to the principles outlined in its Human Rights Policy and Supplier Code of Conduct, fostering explicit commitments to non-discrimination, equal opportunities, decent working conditions, health and safety, respect for diversity, and zero tolerance for child and forced labor. Within this framework, the company promotes awareness and communication of expectations throughout the supply chain and maintains consultation and reporting channels to facilitate the early detection of potential violations and ensure their proper management.

Business partners

Soltec encourages its business and strategic partners to share the same ethical principles and respect for human rights that govern their activities. In this regard, it promotes alignment between its partners ' policies and practices and its Human Rights Policy, integrating it as an essential element of responsible, sustainable collaboration focused on long-term value creation.

The company expects its business partners to:

- **Integrate** explicit commitments to business ethics, regulatory compliance and **human rights due diligence** , paying special attention to the most relevant risks in your sector and operating geographies.
- **Avoid** and prevent any practice that may constitute a violation of fundamental rights, ensuring diligent action in the face of any indications of non-compliance.
- **Promote** fair, safe and inclusive working conditions, including non-discrimination, equal opportunities, freedom of association, health and safety at work and zero tolerance for child and forced labor.
- **Incorporate** control, traceability, and transparency measures into your own value chain, promoting the identification and mitigation of risks and the continuous improvement of your social performance.

Soltec believes that generating responsible alliances is a key lever for consolidating a fairer, more resilient business model committed to social welfare, strengthening the trust of stakeholders and contributing to a more responsible supply chain across the sector.

Customers

Soltec maintains a firm commitment to fairness, integrity, and responsibility in its relationships with clients. The company is committed to preventing any form of unjustified discrimination in access to its products and services, guaranteeing **fair, transparent, and non-discriminatory treatment** at every stage of the business relationship, from the initial offer and contract to execution, after-sales service, and ongoing support.

Soltec also strictly respects the **privacy** and **protection of its clients' personal data** , ensuring compliance with applicable data protection and confidentiality regulations. The information management systems and procedures implemented by the company ensure the **secure custody** , **integrity ,** and **responsible processing** of information provided by its clients, based on criteria of necessity, minimization, access control, and traceability.

During fiscal year **2025** , no claims were registered regarding customer privacy breaches, nor were any confirmed incidents related to the theft or loss of personal data identified. Soltec remains committed to information security, implementing technical and organizational measures aligned with the **General Data Protection Regulation (GDPR)** and the principles of **ISO/IEC 27001** , continuously strengthening the protection, confidentiality, and availability of processed data, as well as its capacity to respond to potential threats.

The company works to ensure that the customer experience is fully aligned with its values of **sustainability, technical excellence and ethical compliance** , contributing to building long-term relationships based on trust, service reliability and transparency in management.

Local communities

Soltec reaffirms its commitment to environmental protection and respect for the rights of local communities as essential elements of its sustainability model and social responsibility. In carrying out its activities, the company operates according to the principle of " **do no harm** ," promoting responsible management focused on the conservation of natural resources, the protection of ecosystems, and a positive contribution to the quality of life of people in the territories where it operates.

local communities are considered to be those groups and individuals that may be affected, directly or indirectly, by the activity of the Group, whether in operating centers, work environments or areas of influence of the projects.

Within this framework, Soltec carries out its activities in accordance with the following principles:

- **Respect for the rights of minorities and indigenous peoples,** promoting open and respectful dialogue and integrating cultural diversity in the territorial contexts in which the projects are implemented.
- **Protection of the right to a healthy and safe environment,** taking into account the social, environmental and cultural expectations of the potentially affected communities and incorporating them, as far as possible, in the planning and execution of projects.
- **Responsible taxation and zero tolerance towards corruption and bribery,** ensuring that economic activity is carried out with integrity and contributes ethically to local development.
- **Promoting fair and equitable access to energy,** collaborating with public administrations and other agents to facilitate sustainable energy solutions, especially for vulnerable groups or those at risk of exclusion.

Soltec also commits to ensuring the proper internal and external dissemination of its Human Rights Policy, encouraging relevant stakeholders to understand its principles and integrate them into their relationship with the company.

In accordance with its compliance model, Soltec provides its stakeholders with a specific channel for inquiries and complaints, managed under criteria of confidentiality, diligence and impartiality, intended to receive, analyze and deal with possible breaches related to the commitments assumed in the area of human rights, environment and relations with communities.

4.3 PEOPLE FIRST

At Soltec, we firmly believe that people are the driving force behind our business. In a particularly challenging economic and organizational environment, the commitment, professionalism, and adaptability of our staff have been crucial in maintaining operations, ensuring business continuity, and advancing the company's strategic priorities.

Throughout 2025, Soltec faced significant challenges stemming from the previous year's economic situation and the organizational changes necessary to ensure business sustainability. In this context, our strategy remains firmly driven by internal talent, continuous innovation, and a customer-centric approach. We continue to champion an employment relationship model based on trust, professional development, and mutual commitment, understanding each relationship with our people as a long-term partnership.

Soltec remains committed to an inclusive, collaborative, and human rights-respecting work environment, promoting job stability and providing real opportunities for growth. Through proactive training, internal mobility, and talent management policies, we continue to enhance each individual's capabilities to successfully meet the challenges of a rapidly transforming industry and further professionalize our organizations.

Despite the complex financial environment inherited from 2024, Soltec has demonstrated a strong capacity for adaptation and resilience. The company has maintained its commitment to a dedicated, diverse, and skilled team, which continues to be one of our most valuable assets for building Soltec's sustainable future and ensuring our competitiveness in a changing global landscape.

Main Indicators	2025	2024
Number of employees	365	961
Percentage of women on staff	26.3%	20.1%
Percentage of women in senior management	27.6%	28.6%
Total training hours (1)	4,344	8.114
Training hours per employee	4.2	3.8
Voluntary turnover rate	14.4%	17.7% (*)
Total turnover rate	64.6%	55.1% (*)

training is included . The decrease in hours compared to 2024 is due, on the one hand, to the reduction in staff and, on the other hand, to adjustments in volume and scope as a result of the company's current economic and operational situation.
(*) Corrected data

Methodological note: The People indicators for fiscal year 2025 were compiled using information from various management systems, within the context of the transition to the new corporate ERP system for people, Factorial. To enhance data reliability, the information was cross-checked between systems and validated with the Group's various subsidiaries. The data migration and cleansing process will continue throughout 2026. Any significant adjustments to the information reported in 2025 will be reflected, where applicable, in the following fiscal year.

What we have achieved by 2025...

Soltec has continued to advance in consolidating a people management model aligned with the strategic challenges of the business and the demands of a transforming organization. This year, key initiatives have been launched to strengthen equality, professionalize processes, and develop talent, reinforcing our culture based on transparency, continuous improvement, and employee experience.

The most significant advances of the exercise have been:

- Promoting equality and specific training: Training actions have been implemented aimed at the LGBTI community and the staff in general, reinforcing awareness, respect and the creation of diverse and inclusive environments.
- Strategic training for business and people: The training offer has been expanded with key content for internal activity and employability, prioritizing transversal skills that support the evolution of the business.
- DPO model focused on operational improvement: A model has been consolidated focused on optimizing critical flows and driving continuous improvement in areas essential to the company.
- More comprehensive performance evaluation: An evaluation model has been applied that combines skills, performance and self-evaluation, complemented by feedback sessions and the definition of Individual Development Plans.
- Global review of selection, onboarding and offboarding processes : The procedures have been reviewed to improve traceability, objectivity and efficiency, ensuring a more consistent and positive candidate and employee experience.

Modernization of management platforms and employee experience: Management tools and systems have been renewed to offer a more intuitive, agile and people-centered experience, facilitating key processes and promoting employee autonomy.

During 2026 we will continue working on...

During 2026, Soltec will continue to advance in building a solid, coherent, and global people model, focused on equality, well-being, organizational simplification, and strengthening our corporate culture. Our efforts will be directed toward the following areas:

- Strengthen equality measures, with special attention to the LGBTI community
- To promote the overall well-being of people
- Review and simplify policies, procedures, and documentation
- Promote operational efficiency and process centralization
- Strengthen the global vision and organizational coherence

Our staff

Soltec has a workforce of **365 employees at the close of fiscal year 2025** , distributed across **9 countries** , representing a **62% decrease** compared to the previous year. This change is primarily due to the implementation of the workforce reduction plan (ERE) and the internal restructuring and reorganization process undertaken by the company, aimed at adjusting its cost structure and capabilities to the new business environment and preserving operational sustainability and business viability.

The profile of the Soltec team

As of December 31, 2025, Soltec's workforce is diverse (by country, gender, age and professional profile) and reflects its commitment to equal opportunities and non-discrimination.

Number of employees distributed in 2025	Men	Women	Total	<30	30-49	>49
Department Director	21	8	29	0	23	6
Person in charge	123	44	167	8	134	25
Technician	88	33	121	25	86	10
Administrative Assistant	2	2	4	2	2	0
Operator	35	9	44	10	26	8
TOTAL	**269**	**96**	**365**	**45**	**271**	**49**

Distribution of number of employees 2024	Men	Women	Total	<30	30-49	>49
Department Director	27	10	37	0	26	8
Person in charge	259	77	336	26	265	48
Technician	208	58	266	63	183	20
Administrative Assistant	18	20	38	12	26	0
Operator	256	28	284	115	125	44
TOTAL	**768**	**193**	**961**	**216**	**625**	**120**

Number of employees per country	2025	2024
Spain	211	348
Chili	6	32
Colombia	0	277
Brazil	80	200
Peru	8	10
Mexico	16	29
USA	32	45
China	6	11
Italy	4	7
Australia	2	2
TOTAL	**365**	**961**

Number of employees by nationality	2025	2024
Colombia	5	274
Spain	194	322

Number of employees by nationality	2025	2024
Brazil	83	203
Mexico	30	47
Chili	5	27
USA	12	21
Argentina	3	5
Peru	10	13
China	6	11
Italy	3	7
Others	14	31
TOTAL	**365**	**961**

Social Relations and Collective Agreements

At Soltec, we maintain a firm commitment to freedom of association, effective collective bargaining, equal opportunities and non-discrimination, promoting equitable working conditions and ensuring the application of equality criteria for work of equal value in the different territories in which we operate, in accordance with applicable regulations.

Throughout 2025, the company continued to foster an open, fluid, and constructive social dialogue with the legal representatives of its employees. In a context marked by restructuring and business adjustments, communication and dialogue were especially important in promoting a climate of respect, transparency, and collaboration, and no significant labor disputes were reported.

Given the Group's international presence and geographical diversity, each Soltec company adheres to the labor regulations in force in its jurisdiction, taking into account the nature of its business and the size of its workforce. Labor rights—including freedom of association and representation—are governed by applicable legislation and, where appropriate, by collective bargaining agreements or contracts signed with the legal representatives of the employees.

% coverage of collective agreements	2025	2024
Spain	100	100
Brazil	100	100

In Spain, the relevant collective agreements that apply to Soltec employees include, among others:

- Collective agreement for the iron and steel industries of the Region of Murcia and Seville and its province.
- Metal Trade Agreement of the province of Badajoz.
- Metal agreement of the province of Cadiz.
- General agreement for the construction sector and framework in Murcia

- Agreement for the engineering companies and technical studies offices sector.
- Agreements for offices and firms in Murcia and Madrid.

In the other countries where Soltec operates, subsidiaries apply sectoral or company agreements when they are formalized or, failing that, are governed by national labor legislation, ensuring in all cases respect for international principles and standards regarding fundamental labor rights.

Digitization of information relating to people in the company

Soltec continues to advance the digitalization of its human resources management processes as a strategic lever to improve operational efficiency, strengthen the traceability and quality of information, and offer a more agile and consistent experience to its employees. This drive enables the availability of more consistent data for decision-making, facilitates compliance with internal and regulatory obligations, and strengthens talent management in an increasingly dynamic environment.

During 2025 , Soltec took a decisive step in the comprehensive modernization of its human resources management systems by implementing **Factorial as its new HR ERP** , consolidating previously scattered processes onto a single platform . This transformation has enabled the creation of more efficient workflows, reduced manual tasks, and provided a more intuitive and user-friendly tool for employees, facilitating their interaction with the company at every stage of the employee lifecycle.

The implementation of the new ERP system has involved the elimination of previous platforms and the integration of several key tools, including the ATS and other management solutions linked to critical processes. This integration has improved traceability, data quality, and the employee experience, fostering more agile and consistent administration.

During this exercise, progress has also been made in reviewing and updating selection, onboarding and offboarding **processes** , aligning them with new technological capabilities and optimizing the journeys of candidates and employees to offer a more cohesive and efficient experience.

In addition , Soltec has maintained the **K - Travel tool** , implemented in the previous year, which continues to be an essential component for managing international travel and related compliance. Furthermore, the company continues to work on its **global digitalization program** , where automation, task simplification, and systems integration are being consolidated as strategic pillars for the coming years.

Looking ahead to 2026, Soltec will continue to advance along this path of modernization, with the aim of **integrating new tools, unifying processes and further simplifying internal management,** reinforcing corporate efficiency and the experience of the people who are part of the organization.

Human Resources

During 2025, Soltec has maintained its commitment to people management focused on respecting labor rights, developing talent and creating safe, inclusive and motivating work environments, in a year marked by a particularly demanding economic and organizational context.

The company has continued to promote its **Human Resources Policy** (approved in 2023) as a framework to consolidate a culture based on equal opportunities, diversity, work-life balance and continuous training, reinforcing the consistency of corporate principles in all territories in which it operates.

Soltec fosters an environment where people actively contribute to the organization's transformation, promoting professional development, collaboration, and continuous improvement. In this regard, internal talent remains a key driver for moving towards a more efficient, resilient, responsible company model aligned with sustainability goals.

Organization of working time

Soltec organizes working hours in accordance with **applicable collective bargaining agreements** and **labor laws** in each of the countries where it operates, ensuring compliance with legal limits regarding working hours, rest periods, and vacations. Work schedules are managed based on principles of fairness, work-life balance, and efficiency, respecting the labor rights of its employees.

In Spain, the ordinary working day is structured from **Monday to Friday** , with the following conditions of flexible working hours:

- **From Monday to Thursday** : flexible entry between **8:30 and 9:30 a.m.** , with departure from **5:00 p.m. onwards** , provided that the corresponding workday has been completed.
- **Fridays** : intensive workday with arrival at **8:30 a.m.** and departure at **2:30 p.m.** In 2025, flexible arrival times will also be available on this day, from 8:30 a.m. to 9:30 a.m.

This organization allows employees to adapt their schedules within a regulated framework, promoting a **better work-life balance** , while ensuring operational coverage of key areas of the company.

Equal opportunities and non-discrimination

Soltec maintains a firm commitment to equal opportunities and non-discrimination as a cross-cutting principle of its sustainability strategy and people management model. The company does not tolerate any type of discrimination, direct or indirect, based on age, race, ethnicity, color, sex, religion or beliefs, political opinion, nationality, sexual orientation, gender identity and/or expression, social origin, or disability, and promotes a respectful, inclusive, and safe work environment for all employees.

This commitment is implemented through a management and control framework that ensures equal treatment and opportunities in all organizational processes. Soltec has a current Equality Policy and Equality Plan, which are reviewed and updated regularly, as well as designated roles and bodies responsible for their implementation, monitoring, and evaluation, in coordination with the Human Resources department and legal representatives where applicable. The current Equality Plan incorporates specific measures and objectives, with monitoring indicators, aimed at consolidating a corporate culture based on equity, shared responsibility, and zero tolerance for any form of harassment or discrimination.

The priority lines of action include, among others:

- **Safety and health at work** , incorporating an inclusive and diversity-sensitive approach.

- **Training and awareness-raising with a gender perspective** , to reinforce unbiased behaviors and decisions.
- **Shared responsibility and reconciliation of personal, family and work life** , promoting measures that favor balance and real equality.
- **Inclusive communication and use of non-sexist language** , both in internal and external environments.
- **Prevention and action against sexual harassment and harassment based on sex** , through specific protocols, communication channels and protection measures.
- **Selection, promotion and hiring processes based on equal opportunities** , guaranteeing objective and transparent criteria.

In 2025, Soltec will have fully operationalized and consolidated the mechanisms implemented in previous years to guarantee a safe, respectful, and inclusive work environment. The company has a specific and confidential channel for reporting potential harassment, as well as a suggestion box for equality and work-life balance issues—tools that remain essential for promoting active listening and the participation of all employees.

Soltec reaffirms as a fundamental principle the right of all individuals to be treated with dignity, respect, and fairness. The organization has internal procedures in place for the prevention, detection, and response to psychosocial risks, including a specific protocol against workplace harassment, which establishes clear measures for prevention, immediate action, and follow-up on any incident. Throughout 2025, these mechanisms have continued to be implemented and strengthened as part of the company's commitment to a safe and healthy work environment.

Soltec also actively works to promote inclusion, equal opportunities, and non-discrimination for people with disabilities, both within its workforce and in access to employment. This commitment translates into the existence of procedures and guidelines designed to identify and appropriately manage situations involving health conditions, disabilities, biological states, or other circumstances that may lead to particular sensitivity to certain working conditions.

Within this framework, Soltec guarantees the specific protection of particularly vulnerable employees, integrating these characteristics into occupational risk assessment processes and applying, where appropriate, reasonable preventive and adaptive measures (organizational, technical, and/or ergonomic). These actions are carried out in compliance with current regulations in each country where the Group operates and under criteria of confidentiality, respect, and non-stigmatization.

Additionally, regarding accessibility, Soltec promotes the employment of people with disabilities, fostering inclusive and barrier-free work environments. The company works to ensure that its facilities—particularly offices and common areas—are accessible, safe, and functional, incorporating progressive improvements and accessibility criteria into its renovation and maintenance activities.

During the 2025 fiscal year, no incidents or complaints related to equality, discrimination or harassment issues were recorded, reflecting the organization's commitment to a safe, respectful and healthy work environment, reinforced through awareness actions, action protocols and internal communication channels.

Equal opportunities management framework

- **Equal Opportunities Policy**

Soltec's Equal Opportunities Policy, integrated within its Global Human Resources Policy, aims to reinforce the company's commitment to genuine equality between women and men and to non-discrimination in the workplace. This framework guarantees equal treatment and opportunities in all people management processes—recruitment, recruitment, training, promotion, compensation, and development—and promotes measures designed to prevent and eliminate any form of discrimination, direct or indirect, within the organization.

- **Standing Committee and Equality Officer**

Soltec has a **Standing Equality Committee** , responsible for overseeing the effective implementation of the principles of equal opportunities and non-discrimination within the company. Its functions include monitoring compliance with the established measures, identifying potential situations of inequality, and proposing preventive and corrective actions, thereby promoting the continuous improvement of the equality framework.

Additionally, the **Equality Officer** plays a key role in promoting and coordinating the Equality Plan, acting as a point of reference for technical advice, energizing initiatives, supporting the committee, and monitoring indicators and actions. Furthermore, they contribute to strengthening **awareness and training** on equality issues among all employees, fostering an inclusive corporate culture aligned with Soltec's values.

- **Equality Plan**

Soltec's Equality Plan, in effect and registered in 2023, includes a set of measures and commitments aimed at guaranteeing effective equality and non-discrimination in the workplace. The plan incorporates specific actions in key areas such as access to employment and recruitment, promotion and professional development, gender-sensitive training, shared responsibility and work-life balance, prevention of and response to sexual harassment and harassment based on sex, as well as occupational health and safety from an inclusive perspective.

The Plan also establishes mechanisms for monitoring and periodic evaluation to analyze its implementation, measure the effectiveness of the measures, and reinforce, where appropriate, new improvement actions. This continuous review allows the Plan to be adapted to the organization's evolution, emerging social challenges, and the applicable regulatory framework in the regions where Soltec operates.

Equal pay

In 2025, Soltec has continued to strengthen its commitment to fair, equitable and merit-based compensation, promoting equal pay for women and men and adapting its salary policy to the economic and organizational context of the year, without abandoning the principles of transparency, sustainability and responsibility that govern the management of people in the company.

Soltec has a structured compensation system, based on objective criteria and performance, that recognizes the value each person brings to the organization, both for achieving results and for aligning with corporate values. The system also includes mechanisms for recognizing exceptional contributions, helping to strengthen motivation, commitment, and talent retention.

The compensation scheme is structured around the following key elements:

- **Fixed remuneration:** determined by the position, professional category, and level of responsibility. It is established with reference to the collective bargaining agreement applicable in each territory and the specific agreements in force in each country, guaranteeing internal equity and external competitiveness.
- **Variable compensation:** linked to the achievement of individual, departmental, and strategic objectives. In 2025, this component was maintained for the entire workforce globally, reinforcing a culture of shared responsibility, results orientation, and performance recognition.
- **Employee benefits:** Soltec offers benefits tailored to the regulations and practices of each country, including:
    - pension plans in the USA;
    - private health insurance in the USA and Brazil;
    - welfare and recognition measures, such as the afternoon off on the employee's birthday.
- **Flexible compensation:** In Spain, the company maintains its flexible compensation system, allowing employees to optimize their salary through products such as restaurant vouchers , childcare, transportation or health insurance, with the corresponding tax advantages in accordance with applicable regulations.

Soltec continues to promote a compensation policy aligned with the principles of **equality and non-discrimination** , applying consistent and verifiable criteria to avoid pay disparities based on gender, both in recruitment and in promotion and professional development. In a year marked by a particularly demanding environment, average employee compensation has evolved in line with the company's activity, organizational structure, and applicable market adjustments in each region.

During the 2025 financial year, the average remuneration of the workforce has shown an evolution in line with market activity and adjustments:

Average employee remuneration by professional category (€)	2025	2024
Department Director	113,952	115.371
Person in charge	40.475	35,598
Technician	27,624	19,622
Administrative Assistant	20.134	13,247
Operator	7,860	5,322

Average employee remuneration by gender (€)	2025	2024
Man	27,460	19,651
Women	31,327	22.005

Compensation policy

In 2025, Soltec updated and approved a new corporate compensation system with the aim of strengthening internal equity, transparency, and strategic alignment with current business challenges. This new model responds to the need for a fairer, more consistent, and more sustainable salary structure, especially in a context of organizational transformation and resource optimization.

This modernization contributes to a more transparent, predictable compensation policy that is aligned with the principles of equality, diversity, and sustainability that are part of Soltec's ethical and strategic framework.

This policy also aims to strengthen talent retention and promote the professional development of employees in all the geographies in which Soltec operates, guaranteeing fair and equitable treatment and avoiding any form of discrimination based on gender, age, origin or any other personal or social condition.

To measure and monitor the gender pay gap, Soltec uses the average salary of women and men by professional category as a benchmark, considering both fixed and variable compensation. However, interpreting this information requires contextual analysis, taking into account, among other factors, the following:

- **Heterogeneity within professional categories:** the same category can group different positions, with different salary ranges depending on the level of responsibility, the function and the geographical area.
- **Structural differences between countries and subsidiaries:** there are relevant particularities in regulatory frameworks, market practices and local remuneration structures that influence comparability.
- **Uneven presence of categories by company or country:** not all categories and positions are represented in all subsidiaries, which may affect the aggregate interpretation of the results.

This approach allows Soltec to monitor trends, identify potential areas for improvement, and guide corrective or reinforcement measures when necessary, consistent with its principles of equality, transparency, and meritocracy.

In this context, the gender pay gap for each category was calculated as the difference between the average pay for men and women, divided by the average pay for men. Based on this data, a **weighted average was also calculated** , taking into account the proportion of each professional category within the total workforce during the year.

In 2025, the average gender pay gap stood at -14.08% , showing a positive trend compared to the previous year **(-12% in 2024)** and confirming that, in aggregate terms, there is no gender pay gap across the organization. This result reinforces the company's commitment to equal pay, which will continue to be implemented through specific measures regarding pay equity and regular reviews of compensation policies and practices.

Furthermore, Soltec remains committed to strictly adhering to legal minimum wages and the compensation conditions established in applicable labor frameworks. In Spain, the ratio between the minimum wage paid by the company and the Interprofessional Minimum Wage (SMI) is maintained above one, ensuring that no remuneration falls below the established legal threshold.

In the other countries where it operates, Soltec ensures strict compliance with local labor regulations regarding wages, as well as collective agreements and applicable agreements in each jurisdiction, integrating these requirements into its internal processes for people management and compensation review.

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Talent selection at Soltec

During 2025, Soltec faced a particularly complex situation stemming from the financial and organizational challenges accumulated over the past year. This situation led to the departure of certain professionals, some of them highly specialized, which had a significant impact on several areas of the business and highlighted the importance of continuing to strengthen employee loyalty and active listening within the organization.

Despite this context, significant opportunities for promotion and growth have also emerged for internal talent, reinforcing Soltec's commitment to recognizing the potential of its people and fostering sustainable career paths. The company has implemented internal mobility processes and positive team restructuring focused on strengthening the capabilities the business needs in this new cycle.

The company continues to apply a global selection model based on the principles of **equal opportunity, non-discrimination, transparency, and objectivity** , with a focus on evaluating **merit** , **skills** , and **cultural fit** . Soltec actively works to ensure that recruitment and hiring processes are free from bias, guaranteeing **equitable access to employment** regardless of gender, age, origin, religion, sexual orientation, disability, or any other personal or social condition.

The selection procedure incorporates the necessary phases to ensure **traceability** and **consistency** , including: identifying and justifying the need, validating the vacancy, publishing and disseminating the job posting, reviewing resumes, conducting competency-based interviews, performing technical assessments when applicable, and conducting final interviews. These stages are supported by **digital tools** and methodologies adapted to the regulatory and operational context of each region, reinforcing the consistency of the process globally.

As part of strengthening its value proposition and progressively rebuilding key capabilities, Soltec maintains its **global referral program** , designed to promote employee participation in talent attraction and facilitate the integration of profiles aligned with the corporate culture. However, during 2025, the program's **operation was limited** , consistent with the reorganization and adjustment of activity experienced by the company.

Professional development

In 2025, Soltec took a decisive step in consolidating a more comprehensive, modern assessment model focused on the holistic development of talent. Throughout the year, work was done on implementing a new core competency assessment model that incorporates three key dimensions in a balanced way: competencies, performance, and self-assessment.

manager evaluations and self-evaluations, fostering a more objective and transparent process. Based on this, each person participated in a structured feedback session designed to encourage dialogue, align perceptions, and establish clear agreements for a Continuous Improvement Plan that will be developed and monitored throughout the following year.

Furthermore, following the formal evaluation phase, the company has conducted a talent analysis and reflection exercise, aimed at defining individual development plans, identifying critical capabilities, and detecting high-potential profiles. potential and key This work allows for the analysis of possible growth paths, as well as the assessment of the implementation of specific plans for retaining strategic talent.

With this model, Soltec reinforces its commitment to meritocracy, transparency and continuous improvement, promoting a culture where professional development is conceived as a shared process, based on quality conversations, clear objectives and support.

Training and promotion of employability

Despite the challenges of 2025, marked by a challenging economic environment and the organizational adjustments necessary to strengthen business sustainability, Soltec has remained steadfast in its commitment to training as a strategic pillar of development and resilience. The company continues to focus on providing its professionals with the tools, knowledge, and skills necessary to successfully meet the current and future challenges of the sector.

During this period, special emphasis has been placed on content critical to the company, promoting training programs focused on cybersecurity, equality and diversity, and EHS (Environment , Health & Safety) and Sustainability. These areas have been positioned as priorities both for protecting the business and for creating safe, inclusive, and responsible work environments.

Training plans continue to be geared towards supporting the integration, technical updating and growth of the entire staff, fostering collaboration between areas and ensuring that each person has real opportunities to advance in their own development and contribute to the collective progress of Soltec.

Main Indicators	2025	2024
Total training hours (1)	4,344	8.114
Training hours per employee	4.2	3.8

(1) EHS training is included.

The objectives of Soltec's training system are as follows:

- **Align training with corporate strategy and priorities** , ensuring its direct contribution to the deployment of the Group's strategic plans, even in a context of business transformation and adaptation.
- **To guarantee the technical and skills training** necessary for the effective performance of each position, at all organizational levels and across all subsidiaries and geographies where Soltec operates.
- **Responding to the new needs of the business and the market** , reinforcing the continuous updating of knowledge related to innovation, quality, digitalization, sustainability and the evolution of products and services.
- **Facilitate the integration and development of teams** , supporting both the onboarding of new members and the updating of existing team capabilities through structured training pathways.
- **Promote professional growth and internal mobility** , favoring promotion, talent retention and participation in cross-functional projects, through development plans and career-oriented training actions.

Work-life balance

In 2025, Soltec maintained its commitment to work-life balance for its employees, even in a more challenging economic environment marked by resource optimization. Despite these circumstances, the company continued to offer accessible flexibility and work-life balance measures for all employees, regardless of their contract type, as part of a corporate culture focused on respect, well-being, and talent retention.

Flexibility and work-life balance measures maintained in 2025:

- **Flexible working hours:** Soltec continues to promote flexible start times, intensive work schedules during the summer period, and flexible work schedules that facilitate better personal planning, always in accordance with the operational needs of each team.
- **Permits and adjustments:** Specific permits are maintained for the attention of personal matters (e.g., moving, administrative procedures or family care needs), as well as the possibility of requesting leaves of absence and reductions in working hours in accordance with current regulations and internal application frameworks.
- **Work-life balance:** The company has preserved key measures such as occasional teleworking (one day a week for structural positions when the position allows it), reduced working hours for childcare and the option between intensive working hours or five free Fridays during the summer, reinforcing co-responsibility and the balance between professional and personal life.

- **Complementary benefits:** Soltec has continued to promote additional benefits linked to the employee value proposition, to the extent that the organizational and economic context allows, prioritizing those initiatives with the greatest impact on well-being and retention.

- **Digital disconnection:** Soltec recognizes and guarantees the right to digital disconnection as an essential element of well-being. This principle, enshrined in the Human Resources Policy, ensures respect for rest periods, leave, and vacations, as well as personal and family life, both in on-site and remote work environments.

During the 2025 fiscal year, a total of **11 men** and **8 women** enjoyed parental leave (in 2024 there were **33 men** and **16 women**).

The staff maintains autonomy to organize their working hours within the framework established by the applicable collective agreements and internal agreements, ensuring in all cases the adequate coverage of the operational needs associated with each position and business unit.

Internal communication

In 2025, Soltec reaffirms internal communication globally as a fundamental pillar of its management, especially in a context of uncertainty. Our goal is to guarantee transparency, offer two-way channels of expression for everyone in the company, and provide truthful, timely, and useful information that allows everyone to understand the reasons behind decisions and their impact on daily operations. This comprehensive approach also seeks to preserve and strengthen the spirit of unity, uniting teams and geographical locations around a common purpose.

With this approach, Soltec continues to strengthen its Internal Communication Plan, ensuring the alignment of corporate messages with the business strategy and the real needs of the teams. Clear communication rhythms, understandable and accessible formats, and listening spaces that encourage feedback and active participation are prioritized . The goal is for everyone to have timely and appropriate information and effective channels to raise questions, proposals, and concerns, thereby reinforcing trust, shared responsibility, and commitment to the challenges of the present and the future.

internal communication policy remains structured around three priority objectives:

- **To strengthen the sense of belonging and corporate pride** , promoting cohesion between divisions, countries and subsidiaries of the Group, especially in a context of organizational transformation and consolidation.

- **To promote an organizational culture based on transparency, collaboration and inclusion** , ensuring that internal communication consistently reflects the values and principles that define Soltec.

- **Supporting change management through agile, clear and results-oriented** communication , aligned with continuous improvement, cross-functional coordination and strengthening internal trust.

Communication channels

To ensure effective communication, Soltec uses a combination of **digital and face-to-face channels** that allow it to reach all employees, regardless of their geographical location, function, or type of position.

Online channels

- **Corporate email:** main channel for sending institutional communications, organizational updates, internal announcements, newsletters and relevant operational messages, all through announcements called SolBit and Special Announcement .

- **Viva Engage (formerly Yammer):** an internal social platform that facilitates communication segmented by areas, promotes bidirectional interaction, and energizes participation through communities and thematic groups.
- **Solnet :** a corporate intranet based on **SharePoint** , which centralizes access to digital tools, shared resources, corporate documentation, and key content for the organization.
- **Microsoft Teams :** a reference tool for meetings, project coordination, collaborative work and quick communication between teams, promoting agility and cross-functional connection.
- **Factorial:** In addition to its function as a centralized people management system, Factorial establishes itself as an additional channel of internal communication for day-to-day operations, especially useful in coordinating exercises, processes, and reminders.

Offline channels

- **Face-to-face meetings and *town halls* :** spaces for direct and two-way communication between management and teams, aimed at strengthening closeness, sharing relevant information and aligning priorities and objectives.
- **Informative signage in plants and offices:** physical support for the dissemination of internal campaigns, operational reminders and institutional messages in productive or operational locations, ensuring reach also to groups with less exposure to digital channels.

Together, these channels complement online media and align with market best practices, reflecting Soltec's commitment to honest, inclusive, consistent communication focused on the well-being of working people.

Employee satisfaction

At Soltec, employee well-being and perceptions of the organization remain key drivers for **continuous improvement** and **strategic decision-making** in people management. The company regularly conducts **annual employee climate surveys** to gather employee feedback and obtain structured information on areas such as innovation, leadership style, diversity and inclusion, internal communication, engagement, and the overall employee experience.

In 2025, Soltec conducted another edition of its global employee climate survey, reaffirming its commitment to active listening, participation, and continuous improvement of the work environment. The company is currently in the detailed analysis phase of the results, aiming to identify patterns, areas of opportunity, and levers for action that will strengthen the employee experience and engagement.

As part of this process, specific working sessions are planned with key teams and areas to deepen the understanding of the results, contextualize the insights gathered, and build shared conclusions. These sessions will allow the data to be transformed into valuable qualitative information to guide decisions and prioritize initiatives.

Soltec intends for the survey findings to serve as a basis for defining and implementing specific improvement actions, with follow-up throughout the following year. These actions will be aimed at strengthening internal communication, team cohesion, leadership, workload, and any other dimension identified as relevant to well-being and performance.

With this approach, Soltec continues to consolidate a culture of transparency, participation and co-responsibility, where the voice of the people is an essential tool to move towards a stronger, healthier work environment aligned with the company's values.

4.4 SAFETY AND HEALTH

Soltec considers the comprehensive protection of the health and safety of its employees to be one of its fundamental commitments. This commitment is realized through the implementation of policies and management systems aligned with international standards, such as **ISO 45001:2023** for occupational health and safety and **ISO 14001:2015** for environmental management, which are applied globally.

Soltec's management system is based on a **preventive and proactive approach** , aimed at identifying, evaluating and controlling the risks inherent in each activity before its execution, ensuring that all operations are carried out in accordance with technical and regulatory criteria that guarantee the physical and mental integrity of the workers.

In Spain, Soltec maintains the organizational model implemented through a **joint prevention service** , which provides coverage to all companies in the group in the following specialties:

- **Workplace safety**
- **Industrial hygiene**
- **Ergonomics and applied psychosociology**

health surveillance specialty , the company continues to rely on an **external prevention service** , guaranteeing legal compliance and appropriate medical follow-up.

In the rest of the international subsidiaries, Soltec manages prevention in accordance with the legal requirements applicable in each country, ensuring compliance with the different local regulatory frameworks.

In addition, Soltec has its own organizational resources for prevention, channeled through the **EHS (Environment , Health & Safety) Department** , a functional unit reporting to senior management. This department is responsible for, among other functions:

- Provide specific training in prevention.
- Coordinate periodic audits and inspections.
- Supervise compliance with procedures on site and in offices.
- Ensure the consistent implementation of preventive measures.

The EHS network is structured with a corporate director located at the headquarters in Murcia and EHS managers assigned to each project and international subsidiary.

At Soltec Spain, the company has prevention delegates and **a Health and Safety Committee** , in accordance with national legislation, as part of its commitment to the active participation of employees in preventative management. Similarly, in the other countries where it operates, Soltec guarantees representation in matters of occupational health and safety through the legally established structures in each jurisdiction (for example, **CIPA** in Brazil). This network of representation allows for a consistent preventative approach, respecting local regulations and fostering a safe and collaborative work environment globally.

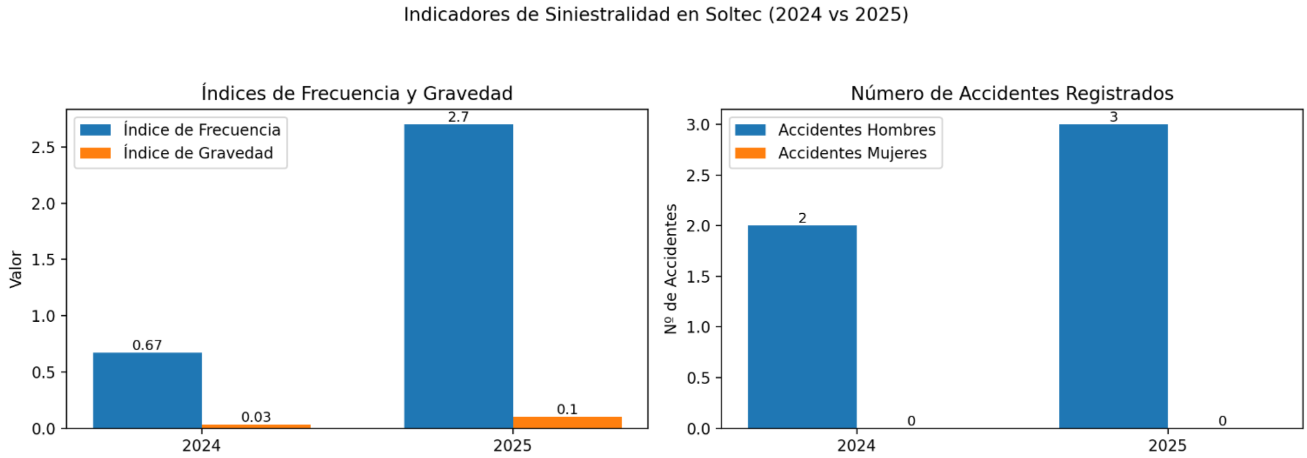
Soltec recognizes that working conditions are key to employee engagement and retention. Therefore, it promotes a safe, healthy, and stable work environment, aligned with applicable regulations and local collective bargaining agreements, which includes measures such as:

- Mandatory provision of appropriate personal protective equipment.
- Training and certification in high-risk tasks.
- Right to stop activities in unsafe conditions.
- Mandatory compliance with safety standards and protocols.
- Conducting occupational medical examinations according to the position.

Performance in accident rate (2025)

In 2025, Soltec recorded **three work-related accidents resulting in lost work time in Spain** (two accidents in 2024), all minor **and** involving **male employees** ; no female employees experienced any accidents resulting in lost work time. As a result, the indicators showed a **frequency rate of 2.7** (0.67 in 2024) and a **severity rate of 0.10** (0.03 in 2024). This increase is explained, on the one hand, by the higher number of accidents resulting in lost work time recorded during the period and, on the other hand, by the significant reduction in working hours, resulting from decreased activity and organizational changes within the company.

In parallel, and as a particularly relevant element, in 2025 there has been a **significant reduction in accidents without lost work time** , with **5 cases** compared to **31 in 2024** , as well as a decrease in **commuting accidents** , with **1 case** in 2025 compared to **10 in 2024.** This trend reflects a substantial improvement in the prevention and control of non-disabling and commuting incidents, while maintaining the focus on reducing accidents resulting in lost work time and consolidating a robust preventative culture, with the aim of reversing the trend in workplace accidents and improving occupational safety and health performance in the coming years.



During 2025, no cases of occupational disease were reported, nor were any high-risk jobs identified.

Soltec is committed to continuing to reduce workplace accidents and promoting an increasingly healthy work environment. In this vein, the company maintains its adherence to the **Luxembourg Declaration** , promoting a comprehensive vision of occupational health that goes beyond legal compliance and incorporates measures aimed at actively improving the physical, mental, and social well-being of all its employees.

4.5 COMMITMENT TO THE CUSTOMER

In a demanding and highly competitive market environment, Soltec prioritizes customer satisfaction, guaranteeing high standards of quality in its products and services and providing continuous technical support throughout the project lifecycle. The company works to build long-term, trusting relationships, responding with agility, personalized attention, and technical expertise to the specific needs of each client and the operational characteristics of each site.

During 2025, Soltec has reinforced its customer focus through initiatives centered on product reliability, efficiency in after-sales service and improving the support experience:

- **Improving the performance and reliability** of solar trackers, prioritizing solutions adapted to the specific conditions of each project (wind, topography, operation, local requirements and environmental conditions).
- **Optimization of after-sales processes** , with greater systematization of incident management, ensuring more consistent response times and more effective coordination with field teams.
- **Customized technical training** for customers and operators, aimed at maximizing availability, performance and correct use of systems.
- **Progressive digitization of support channels** , incorporating tools for incident tracking, traceability, and structured technical communication.

Despite the challenges arising from the economic environment, Soltec maintains its commitment to operational excellence, seeking to generate sustained value for its clients through innovation, service and continuous improvement.

Quality and excellence in our products and services

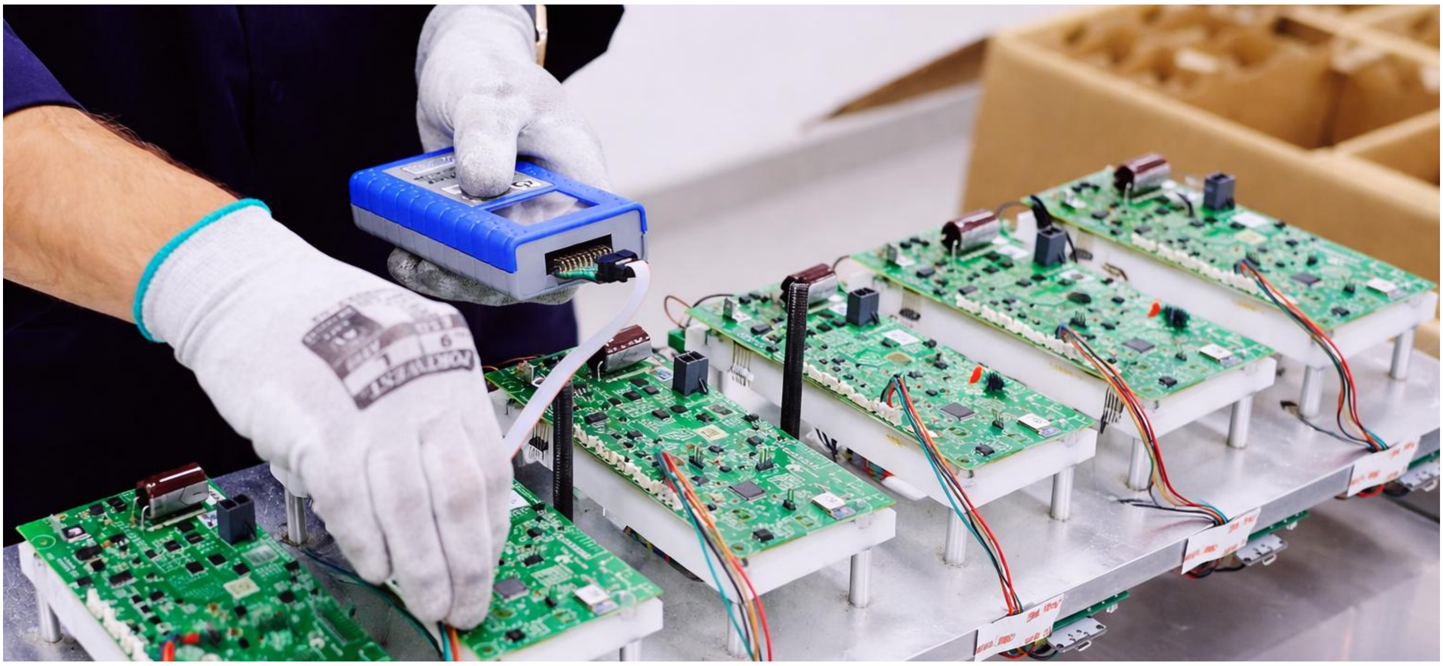
With the aim of maintaining the highest quality standards demanded by its clients, in compliance with applicable regulations and international standards, Soltec has continued to consolidate its focus on excellence in 2025. Throughout the year, the **Integrated Quality, Environmental, and Occupational Health and Safety Policy has remained in effect** , establishing the principles that govern the company's actions in these areas and guiding performance toward maximizing the efficiency of its products and services.

Soltec operates under an **Integrated Quality Management System certified according to ISO 9001** , deployed in the main regions where the company has a presence. Throughout 2025, the continuous improvement of the system was strengthened, consolidating its application in key subsidiaries such as **Brazil and the United States** , in order to guarantee a consistent service and an efficient response to customer needs.

In 2025, the Quality Department continued its work monitoring and improving the management system, ensuring its proper functioning through internal controls and regular audits. During this period, **24 internal quality audits were conducted** , in accordance with the criteria established by **ISO 19011:2018** .

This volume represents **an increase compared to 2024 (23 audits)** , within a context of resource optimization and a more strategic approach to the audit program. In this regard, greater depth and scope have been prioritized in critical areas, maximizing the added value of each audit and strengthening control over processes with the greatest impact on the client and operational performance.

The audits have covered corporate areas and ongoing projects, with the aim of identifying opportunities for improvement, correcting deviations, and strengthening compliance with quality management system standards.



Supplier evaluation and audit

In terms of supply chain management, Soltec continues to use the **GoSupply platform** , maintaining quality criteria that account for up to **40%** of the operational score assigned to each approved supplier. Additionally, specific audits have been conducted on strategic suppliers to ensure the quality of the materials and services purchased, as well as their regulatory compliance and alignment with the Group's ethical and sustainability commitments.

28 supplier audits were conducted , compared to **23 in 2024** , representing an **increase** in the capacity to verify and control key suppliers. This effort has been primarily focused on critical or high-impact suppliers, reinforcing the effectiveness of the assessments and the robustness of preventive controls in a context of operational demands.

Customer complaints and incident management

Customer complaint management at Soltec is handled through the corporate Non-Conformity System, a channel through which all incidents reported by customers are recorded and managed, ensuring a traceable, organized process focused on the continuous improvement of products, processes, and services. During 2025, Soltec registered **20 customer complaints** , compared to **14 complaints in 2024** , representing **an increase** over the previous year.

This behavior is interpreted within a context of high technical and operational demands, in which the company has strengthened its response mechanisms, root cause analysis, and corrective actions. Claims have been managed through measures such as component replacement, on-site repairs, and technical adjustments, ensuring compliance with committed service levels and complete traceability of each case.

The evolution of the indicator has driven the strengthening of preventive measures and organizational learning, consolidating the continuous improvement approach and the systematic use of **lessons learned** from incidents and complaints.

Quality System Improvements by 2025:

In 2025, significant improvements to the system and operational controls have been consolidated and expanded, including:

- **Consolidation of electronic traceability** through QR code reading to ensure quality control of solar tracker components.
- **Reinforcement of internal controls** through electroluminescence, strengthening the validation of field assemblies.
- **Expansion of the work instruction library** , standardizing critical processes at inspection and control points.
- **The interdepartmental procedure has been updated,** revised, and adapted to Soltec's operational and organizational reality in 2025, with the aim of streamlining workflows, clarifying responsibilities, and reducing processing times between departments. This procedure is acting as an enabling framework for information standardization and traceability, and is being used as the structural basis for the progressive rollout of digital transformation.
- **Strengthening the lessons learned system in Quality** , with a structured approach to documenting, sharing and applying knowledge derived from audits, complaints and incidents, aimed at preventing recurrences, optimizing processes and consolidating a culture of continuous improvement .

Product certifications

In addition to having a Quality Management System certified according to the **ISO 9001:2015 standard** , Soltec maintains its commitment to **product certification** as a lever to guarantee the safety, performance and technical conformity of its solutions, in line with regulatory requirements and customer expectations in the different markets in which it operates.

During 2025, the company has reinforced this approach by promoting the acquisition and maintenance of certifications and conformity tests associated with its solar trackers and critical components, with the objective of:

- **Demonstrate compliance with international standards** and applicable technical regulations in each jurisdiction.
- **Validate structural and functional performance** under demanding conditions (wind, loads, fatigue, durability and operation).
- **Reduce technical risk** and strengthen customer confidence through objective, verifiable, and traceable evidence.
- **Facilitate the standardization** of solutions in tenders and projects with specific certification requirements.
- **Ensure consistent quality** throughout the product lifecycle, from design to operation.

This work is structured through a systematic approach that integrates customer requirements, applicable regulations, technical validation through accredited laboratories and organizations, and internal monitoring of compliance, contributing to greater product robustness and continuous improvement of the solutions portfolio.

UL LISTED	**UL 3703 Certification:** Certifies the tracker's reliability, ensuring its mechanical and electrical safety in accordance with solar tracking system standards. It evaluates the tracker's structural design and its mechanical/electrical systems, including the controller, motor, and mounting structure, to prevent risks of electric shock, fire, or mechanical failure.
TÜVRheinland CERTIFIED, CENER, AENOR	**IEC 62817 Certification: An international standard** certification from the International Electrotechnical Commission that qualifies the design and reliability of solar trackers used in photovoltaic plants. It allows for the evaluation and characterization of solar tracker parameters and specifications, such as tracking accuracy, structural load, energy consumption, and durability under environmental conditions.
SGS, ENAC	**EN 1090 Certification:** Certificate of conformity of factory production control that affects manufacturers of metal structures.
ISO 27001	**ISO 27001 Certification:** Certifies that information security is guaranteed and correctly implemented in the company.
ANATEL	**Brazilian Telecommunications Agency (Anatel) Seal:** Certification of the electronic system that controls Soltec's single-axis solar trackers, guaranteeing to customers in Brazil that the installation and use of their solar trackers complies with current regulations regarding safety and regulated technical functionalities.
RWDI	**Dy-WIND System Certification:** Certification of the analysis of dynamic effects due to wind action applied to the design of solar trackers to perform accurate structural dimensioning and provide greater stability of the structure.

Commitment to quality service and customer satisfaction

At Soltec, customer satisfaction is a cornerstone of our business strategy. To ensure high standards of quality in our products and services, the company maintains a robust management system, supported by international certifications, and focused on providing effective, reliable, and safe solutions at every stage of the product lifecycle.

The commitment to customer service goes beyond product delivery and is realized through ongoing support, designed to preserve the efficiency, reliability, and profitability of projects throughout their lifecycle. Soltec believes that a consistent and excellent customer experience is key to building lasting relationships and fostering trust, even in a particularly demanding market environment.

Within this framework, during 2025 Soltec strengthened its After-Sales model, complementing it with two specialized areas: **Operation and Maintenance (O&M)** and **Warranty Management** . This structure allows for the provision of agile and tailored service, supported by local technical teams that address the specific needs of each client in key markets such as **Spain, Brazil, Mexico, the United States, Chile, and Peru** .

One of the key attributes of this model is operational proximity. The company has strategically located **Solhub spare parts logistics centers** , as well as direct technical communication channels, which facilitates a rapid response to incidents, proactive asset tracking, and constant availability to resolve queries or requests.

Furthermore, as part of its Quality System, Soltec has a consolidated procedure for managing **nonconformities** , ensuring a structured, documented response focused on continuous improvement. Each incident is analyzed to identify the root cause, implement the necessary corrective actions, and prevent its recurrence, reinforcing a culture of learning and operational excellence.

In line with its active listening approach, Soltec conducts satisfaction surveys that objectively measure customer perception of its service. In the 2025 survey, the company achieved an **overall score of 4.33 out of 5** , improving on previous results (**4.20 in 2024; 4.00 in 2023; 4.06 in 2022; 4.00 in 2021**), demonstrating a positive and sustained evolution in customer experience.

This customer-centric approach reinforces Soltec's value proposition, not only as a solar technology provider, but as a partner committed to the success of each project from its commissioning to its long-term operation.

4.6 SUSTAINABLE SUPPLY CHAIN MANAGEMENT

In recent years, Soltec has consolidated a supply chain management model based on **agility, flexibility, and proximity** , enabling it to respond more effectively to a global environment marked by cost volatility, logistical challenges, geopolitical uncertainty, and increasing regulatory demands. In **2025** , this model was further strengthened with a focus specifically on **ensuring operational continuity** , fulfilling committed deliveries, and **adapting procurement management** to the company's financial and operational scenario, including **unblocking the supply chain affected by payment defaults during the** pre-bankruptcy phase .

In this context, Soltec has continued to foster collaboration with **local suppliers and subcontractors** in the countries where it operates, promoting greater operational efficiency, a faster response to incidents, and a positive impact on local economies. This approach is particularly relevant for field deployment and project support, contributing to more effective execution and improved responsiveness in complex scenarios.

Main indicators	2025	2024
Total suppliers (Tier 1) (1)	14,934	14,483
Number of new suppliers registered (Tier 1)	491	1.018
Significant Tier 1 Suppliers (360 category) (3)	240	240
Purchase order volume (M€)	62.58	213
% of spending on significant suppliers	28%	37%
% local purchase orders (€M) (2)	15% **(4)**	31%

(1) It includes all suppliers registered in our ERP
(2) We consider local suppliers to be those located in the countries where we operate. Local purchase orders are those where the purchase order, the supplier, and the destination project are all within the same country.
(3) Considering Tracker Spain and Brazil as significant suppliers.
(4) The decline is due to the significant reduction in the total volume of purchases in 2025 and the availability of stock acquired in 2024, reducing the relative weight of local purchases.

Evolution of the management model in 2025

The **Supply Chain Department** remains a cross-functional and strategic area for business execution. By 2025, its operating model has evolved towards a more integrated approach, coordinating **Purchasing, Logistics, Warehousing, and Delivery Tracking** , and reinforcing the definition of interdepartmental boundaries and procedures to increase traceability and efficiency.

During 2025, Soltec has made significant progress in:

- **Completion of supplies** associated with previously committed projects, prioritizing operational continuity.
- **Negotiation with suppliers** on conditions linked to the **restructuring plan** , achieving majority support.
- **Reprogramming/postponement of deliveries** of ongoing orders (between **December 2026 and June 2027**) for an amount exceeding **€20M** , to adapt commitments to the new reality of the company.
- **Reorganization of the Supply Chain area** , more clearly integrating Purchasing, Logistics, Warehouses and Delivery Tracking, with a more precise definition of interdepartmental boundaries.
- **Transformation of warehouse and inventory management** , with a direct impact on accounting closing and the execution of audits, raising the level of control and reliability of information.

- **Improved visibility in SAP/ERP** : systematic incorporation of orders and logistics obligations to provide traceability and forecasting (previously there was no complete visibility at the ERP level).

Planning, control and continuous improvement

In line with the Purchasing Master Plan and the objective of consolidating a more resilient value chain, Soltec has reinforced the continuous improvement of the area in 2025 through:

- **Organization and internal control:** systematic implementation of **expense control** in purchasing, warehouse and logistics, aimed at maximizing cash outflow control.
- **Risk management applied to Supply Chain:** incorporation of specific criteria and assessments on penalties for delays, indexation and freight increases, uncovered guarantees and identified technical risks.
- **Inter-area process improvement:** clarification of the scope of Supply Chain, eliminating the planning part and creating a **cross-functional delivery tracking team** , with more integrated interdepartmental procedures.
- **Digitization and tools:** incorporation of **logistics calculators** and reinforcement of import and market analysis tools to improve decision-making and competitive positioning.

Risks, incidents and lessons learned (2025)

In 2025, the following relevant risks have been identified and/or materialized, primarily:

- **Cost overruns due to project cancellations** .
- **Penalties for late deliveries** , associated with supply chain blockages during the pre-bankruptcy phase resulting from non-payment to suppliers.

data quality and governance in SAP has become evident , especially in areas such as transit warehouses and cross-border operations. trade ”, which generated incidents and blockages in the first months of implementation.

Challenges and lines of work for 2026

Looking ahead to 2026, the area's focus is on adapting the supply chain to the company's new situation and a changing global environment (tariffs, local content policies, CBAM, and raw material volatility). Specifically, the following will be prioritized:

- **Define the target warehouse management model** (analysis and decision on its configuration and operation).
- **Adapt the supply strategy to the sales plan** , sizing capacities and supply commitments.
- **Adapting the supply to local content and tariff policies in the US** , minimizing compliance and cost risks.
- **Staff reorganization** and **consolidation of leadership** in logistics and purchasing.
- **advanced analysis and reporting** (supply, pricing, import and performance) to enhance predictive and control capabilities.
- **Strengthening risk management** and interdepartmental procedures (including updating rates, estimating costs and trends).
- **Strengthen collaborations and alliances with suppliers** , seeking stability and responsiveness.

Emerging risk 2026: the **volatility of steel prices** and the evolution of **CBAM** in the European Union, with potential impact on cost assessment and deferred payments (adjustments and settlements planned from 2027 onwards), increase uncertainty and require enhanced monitoring.

Supply chain management model

Soltec's supply chain management model is structured as a cross-functional role, led by the Supply Chain Department, to support the business lines (manufacturing of solar trackers, project development and after-sales services).

In 2025, this model has evolved with an **organizational and operational redefinition** , reinforcing the integration between **Purchasing, Logistics, Warehouses and Delivery Tracking** , and clarifying interdepartmental interfaces to increase efficiency, traceability and control.

Also, as part of this evolution:

- **The scope** has been redefined , eliminating the planning component within Supply Chain and creating a **cross-functional delivery tracking team** for all areas, products, and regions.
- Control mechanisms, visibility and operational discipline have been strengthened in ERP, with a focus on **data reliability** , compliance with commitments and financial control associated with purchasing and logistics.

Sustainability criteria in the selection and management of suppliers

Soltec maintains a firm commitment to integrating ESG (environmental, social, and governance) criteria throughout its supply chain. Through its Global Purchasing Policy, applicable to all locations and operations, the company consolidates a procurement model based on rigorous supplier qualification, process transparency, and continuous improvement. This framework not only seeks to guarantee legal compliance and the quality of products and services, but also to promote responsible business relationships that generate long-term value.

Throughout 2025, Soltec continued to strengthen its focus on sustainability in purchasing decisions, consolidating the integration of social, environmental, and ethical risk assessments as key criteria in supplier approval, contracting, and monitoring processes. This progress responds to the expectations of both clients and investors, as well as to the gradual adaptation to European regulatory frameworks on sustainability and due diligence, in a demanding market context that requires maintaining high standards of control and traceability throughout the value chain.

In line with this commitment, Soltec requires its suppliers to comply with the principles outlined in the Supplier Code of Conduct and the company's Purchasing Policy, documents proactively shared during the approval and contracting processes. Key requirements include:

Human Rights: adoption of mechanisms that prevent any violation of fundamental rights, in accordance with the Universal Declaration of Human Rights.

Responsible labor practices: prohibition of forced and child labor, respect for freedom of association, promotion of equal treatment and safe and decent working conditions, in accordance with ILO recommendations.

Environmental commitment: implementation of clean production measures, pollution prevention, combating climate change, responsible use of resources and protection of biodiversity, in line with the principles of circular economy.

Ethical practices and transparency: Zero tolerance for corruption, conflicts of interest or anti-competitive practices.

Soltec is committed to responsible procurement that prioritizes sustainability not only as a requirement, but also as an opportunity to generate positive impact and strengthen business resilience. This philosophy is integrated across all contracts and awarded processes, reinforcing sustainability as a verifiable criterion in all business relationships.

In 2025, the company continued to advance in the deployment of its Procurement Master Plan , which establishes annual milestones focused on the sustainable development of the supply chain, maintaining the objective of achieving full alignment with the ISO 20400 guidelines before 2030. Furthermore, Soltec maintained its

UNE 15896 (Value-Added Procurement Management) and ISO 20400 (Sustainable Procurement) certifications, as evidence of the maturity of its Supply Chain model and the consolidation of responsible purchasing practices.

Supplier approval

As part of its sustainability, risk management, and operational efficiency strategy, Soltec has continued the evolution of its supplier qualification process in 2025, consolidating a more agile and digitalized model with greater traceability and consistency at a global level. This process aims not only to ensure technical quality, regulatory compliance, and supply capacity, but also to progressively incorporate ESG criteria into the evaluation and monitoring of the supply chain. With this, Soltec strengthens the resilience of its procurement, transparency in its relationships with third parties, and its shared commitment to responsible environmental, social, and governance standards.

During 2025, Soltec has adopted a sustainable purchasing approach fully aligned with the principles of ISO 20400 and the 7 core subjects of ISO 26000, integrating commitments in human rights, labor practices, environment, fair operating practices, organizational governance, consumer issues and community development.

This approach is implemented through:

- Progressive incorporation of ESG clauses into contracts.
- Supplier segmentation by criticality and ESG risk.
- The deployment of impact and materiality matrices.
- Integrating Sustainable Development Goals (SDGs) into procurement policies.
- KPIs applied to sustainable purchasing.

The approval system is based on a **three-level criticality classification** , taking into account the strategic impact of suppliers on the business. This segmentation allows for the application of controls and requirements proportionate to the type of good or service supplied:

- **360º Suppliers:** They are considered key to the core Soltec's business includes those that supply critical components for solar trackers (profiles, motors, control units, electronics), raw materials, photovoltaic modules, inverters, or cabling. They are classified as significant suppliers and are subject to enhanced approval criteria and periodic monitoring.
- **180º Suppliers:** These are essential, but not critical, partners, primarily involved in the execution of photovoltaic projects. They include assembly subcontractors, electrical equipment distributors, logistics companies, and quality certification bodies. Their approval encompasses technical, economic, and legal compliance aspects.
- **90th-level suppliers:** These suppliers provide functional support goods and services (consulting, auditing, office supplies, general services, etc.) as well as logistics-related purchases. The approval process for this group focuses on ensuring the supplier's technical capacity and solvency, adapting the requirements to the type of service.

Main indicators	2025	2024
Total Tier 1 approved suppliers	678	710
% Approved Suppliers out of total Tier 1 (1)	5%	5%
% of approved significant suppliers	100%	100%
Approved suppliers with high risk	220 **(2)**	276 **(2)**
% of high-risk suppliers that have been blocked	**(2)**	**(2)**

(1) The suppliers that are subject to approval are those that either supply components of solar trackers, raw materials, or perform solar tracker installation services.
(2) In April 2024, the migration to the new SAP ERP system was completed. The first phase of this migration did not include the integration of the GoSupply -SAP interface. This means that suppliers with a high risk rating in GoSupply are not automatically blocked in SAP. This integration is expected to be implemented in 2026.

With the aim of strengthening traceability, transparency, and efficiency in its supply chain management, Soltec has consolidated the use of the digital supplier management platform provided by **GoSupply – Achilles in 2025.** This tool has been integrated as a key element of the approval and monitoring process, facilitating a more structured and consistent evaluation of technical, compliance, and sustainability requirements. It also contributes to strengthening alignment with ESG criteria and international standards for responsible procurement, fostering a more robust and verifiable relationship with the Group's main suppliers.

All suppliers classified as 360° and 180°, considered strategic or critical to Soltec's projects, must register and complete their assessment on the GoSupply – Achilles platform. This system performs a comprehensive supplier evaluation, covering operational, compliance, financial, cybersecurity, and sustainability dimensions, allowing for the assignment of a risk category: *low, medium, medium-high, or high* .

This approach allows Soltec to make more informed purchasing decisions, prioritize controls, and define action and monitoring plans proportionate to the identified risk profile, thus reinforcing its commitment to a responsible, safe, and resilient supply chain.

The level of risk is determined from the combination of: (i) country risk, (ii) information from external sources, (iii) Soltec's prior internal assessment in the case of previous collaborations, and (iv) the result of the questionnaire completed on the GoSupply –Achilles platform.

The questionnaire incorporates environmental, social, governance and strategic variables, weighted differently, as shown in the following figures.

core complementary providers *Businesses (90º or* elementary suppliers) are implementing a more agile evaluation scheme that is proportionate to the scope, criticality, and impact of their activity. This approach optimizes time and resources without compromising the Group's minimum and common requirements for quality, regulatory compliance, and sustainability, ensuring a consistent framework for control and alignment with responsible purchasing principles.

4.7 COMMITMENT TO SOCIETY AND CREATION OF SHARED VALUE

At Soltec Power Holdings, we understand sustainability as the ability to remain and evolve over time, generating not only economic value, but also environmental and social value. To this end, we work to meet the expectations of our stakeholders and maintain an active, respectful, and constructive relationship with the communities in which we operate.

Soltec's commitment to society is realized through initiatives that aim to give back to the community a portion of the value generated, strengthen social cohesion, and contribute to collective well-being. These actions are a key element of the company's corporate identity and reflect how it views its role as a responsible agent in the energy transition.

However, during 2025, and in a context marked by the financial situation and the organizational restructuring process, social and community activity was reduced compared to previous years, with priority given to operational continuity and internal reorganization. Even so, Soltec maintained high-value social initiatives, including:

- **Blood Donation Campaign 2025:** In 2025, Soltec organized an internal blood donation campaign, reaffirming its commitment to making a positive impact beyond its business activities. The initiative involved **24 donors** , all company employees, who directly contributed to the supply of essential blood components for hospitals and healthcare facilities.

Looking ahead to 2026, Soltec plans to progressively strengthen its social focus, recovering and concentrating on broader initiatives related to volunteering, employability, social innovation and environmental conservation, as the stabilization of the organization and the evolution of the context allow for a broader and more structured deployment.

These actions reflect Soltec's commitment to contributing to the well-being of society and maintaining a close relationship with the communities where it operates. The Group's social commitment is not secondary, but rather an integral component of its sustainability vision; therefore, the company remains focused on further consolidating, in the medium term, a social impact agenda aligned with the Sustainable Development Goals (SDGs) and the expectations of its stakeholders.

Soltec's activities also generate a direct positive impact on society through the distribution of economic value among its main stakeholders. A significant portion of revenue is allocated to employee compensation, payments to suppliers, compliance with tax obligations to public authorities, and, where possible, support for initiatives benefiting local communities. This responsible distribution of value is an essential part of Soltec's business model, consistent with its commitment to sustainable development and the well-being of its surrounding community.

Soltec has not made any financial contributions to political campaigns, political parties, or lobbying or pressure organizations.

4.8 SECTORAL PRESENCE

As part of its commitment to the business and sectoral fabric, the Group actively participates in various associations, among which the following stand out:

UNEF	The Spanish Photovoltaic Union (UNEF) represents more than 750 companies, approximately 90% of the sector's activity in Spain, and is the spokesperson for practically the entire industry: producers, installers, engineering firms, manufacturers, distributors and in general any company related to the sector.
appa renovables	The Spanish Renewable Energy Companies Association (APPA) brings together companies and organizations whose purpose is the use of renewable energy sources in all their forms. The Association's primary objectives include defending

	the interests of the sector, providing ongoing, specific information on renewable energy, and offering legal advice and guidelines to its members. APPA represents its members before national, European, and international bodies.
Aremur ASOCIACIÓN EMPRESARIAL DE ENERGÍAS RENOVABLES Y AHORRO ENERGÉTICO REGIÓN DE MURCIA	AREMUR is the business association for Renewable Energies and Energy Saving in Murcia and is integrated within FREMM, the Regional Federation of Metal Entrepreneurs of Murcia, a regional business organization that integrates more than 37 associations and various activity groups in the metal sector: production, repair, installation and maintenance.
cetenma	Cetenma (Energy and Environment Technology Center) is a business association created with the purpose of supporting research, development and technological innovation in companies.
Secartys	Secartys is a non-profit business association that has been dedicated since 1968 to fostering the competitiveness of its members and positioning Spanish industry internationally. It currently represents around 300 companies and knowledge-based organizations in Spain, helping them to increase their competitiveness and develop the sectors in which they operate.
FREMM	The Regional Federation of Metal Entrepreneurs of Murcia (FREMM) is a regional business organization that integrates entrepreneurs from the activities of the metal sector (production, trade, repair, installation and maintenance).
Other memberships and associations	✓ National Union of Metal Industry Workers (Mexico) ✓ Spain-US Chamber of Commerce, Inc. (USA) ✓ Solar Energy Industries Association_SEIA (USA)

4.9 TAX INFORMATION

Fiscal Year 2025 (Thousands of euros)					
	Earnings before taxes	Results after taxes	Taxes accrued	Taxes paid (collected)	Grants received
Spain	67,715	68,434	719	85	251
Brazil	-18,000	-18.653	-653	378	0
Mexico	-209	-212	-3	128	0
Chili	1,897	1,895	-2	1	0
Argentina	-242	-242	-	-	0
Peru	324	324	-	-	0
USA	-7.842	-7.974	-132	137	0
Colombia	-4.875	-4.875	-	17	0
Italy	-10.097	-10.159	-62	210	0
Others	-8.206	-8.204	2	27	0
TOTAL	**20,464**	**20.334**	**-130**	**983**	**251**

Distribution by country of the results and income taxes paid during the **2025** and 2024 financial years

Fiscal Year 2024 (Thousands of euros)					
	Earnings before taxes	Results after taxes	Taxes accrued	Taxes paid (collected)	Grants received
Spain	-20.888	-93.122	-19.885	110	265
Brazil	-9.405	-48.246	-6.685	965	
Mexico	850	-399	-1.249	115	
Chili	-3.369	-3.784	-416	7	
Argentina	1.138	1.138	-	-	
Peru	187	73	-114	-	
USA	-28.724	-29,699	-975	-	
Colombia	-23.148	-24.548	-1.401	1.032	
Italy	-971	-1.472	-501	44	
Others	-3.715	-3.699	16	13	
TOTAL	**-88.044**	**-203.759**	**-31.209**	**2.286**	**265**

ANNEXES

- Annex I: Sustainability Indicators
- Annex II: Taxonomy Indicators
- Annex III: Index of contents required by Law 11/2018
- Annex IV: Interoperability between GRI standards and the ESRS

ANNEX I: SUSTAINABILITY INDICATORS

ENVIRONMENT

Waste

The amount of waste dangerous, fundamentally contaminated soil and batteries), and non-hazardous materials, primarily plastic, paper and cardboard, metal and wood, generated during the exercises 2025 and 2024 They are presented in the following table :

Tons	2025	2024
Dangerous	10	10
Not dangerous	896	1.133

Raw Materials

The main raw materials used during the 2025 and 2024 fiscal years were the following:

Tons	2025	2024
Steel	1,397	37,901
Aluminum	3.65	27

Energy

He total of electricity, diesel fuel and gasoline consumed during the exercises 2025 and 2024, HE presents in the following board:

	2025	2024
Electricity (kWh)	680,972	979.056
Self-consumption (kWh)	78.144	19,420
Diesel fuel (liters)	215,387	1,204,817
Gasoline (liters)	201.035	259,005

Climate change

The emissions for fiscal years 2025 and 2024 amounted to:

	2025	2024
Scope 1 (tCO2eq)	1.018 (1)	3.804 (2)
Scope 2 (tCO2eq)	114 (1)	169 (2)
Scope 3 (tCO2eq)	7031 (3)	103.727 (4)

(1) *Data pending verification.*
(2) *Values corrected with respect to those reported in 2024, once verified and with the FE published in 2025.*
(3) *Value taking into account 60%-70% of total Scope 3 emissions. Total Scope 3 emissions will be calculated and verified during 2026.*
(4) *Value verified, taking into account all (100%) scope 3 emissions*
.

OUR PEOPLE

Employment

The total number and distribution of employees by country and nationality as of December 31, 2025 and 2024 is as follows:

Number of employees per country	2025	2024
Spain	211	348
Chili	6	32
Colombia	0	277
Brazil	80	200
Peru	8	10
Mexico	16	29
USA	32	45
China	6	11
Italy	4	7
Australia	2	2
TOTAL	**365**	**961**

Methodological note:

The People indicators for fiscal year 2025 were compiled using information from various management systems, within the context of the transition to the new corporate ERP system for people, Factorial. To enhance data reliability, the information was cross-checked between systems and validated with the Group's various subsidiaries. The data migration and cleansing process will continue throughout 2026. Any significant adjustments identified to the information reported in 2025 will be reflected, where applicable, in the following fiscal year.

Number of employees by nationality	2025	2024
Colombia	5	274
Spain	194	322
Brazil	83	203
Mexico	30	47
Chili	5	27
USA	12	21
Argentina	3	8
Peru	10	13
China	6	11
Italy	3	7
Others	14	28
TOTAL	**365**	**961**

The total number and distribution of employees as of December 31, 2025 and 2024 by gender, age and professional classification is as follows:

Exercise 2025

Distribution of number of employees 2024	Men	Women	Total	<30	30-49	>49
Department Director	21	8	29	0	23	6
Person in charge	123	44	167	8	134	25
Technician	88	33	121	25	86	10
Administrative Assistant	2	2	4	2	2	0
Operator	35	9	44	10	26	8
TOTAL	**269**	**96**	**365**	**45**	**271**	**49**

Exercise 2024

Distribution of number of employees 2024	Men	Women	Total	<30	30-49	>49
Department Director	27	10	37	0	26	8
Person in charge	259	77	336	26	265	48
Technician	208	58	266	63	183	20
Administrative Assistant	18	20	38	12	26	0
Operator	256	28	284	115	125	44
TOTAL	**768**	**193**	**961**	**216**	**625**	**120**

The total number and distribution of employment contract types, by contract type, gender, age and professional category on December 31, 2025 and 2024 is as follows:

Exercise 2025

Distribution of number of employees by type of contract 2024	Men	Women	Total	<30	30-49	>49
Indefinite	260	94	413	44	262	48
Temporary	9	2	13	1	9	1
TOTAL	**269**	**96**	**365**	**45**	**271**	**49**

Exercise 2024

Distribution of number of employees by type of contract 2023	Men	Women	Total	<30	30-49	>49
Indefinite	600	174	774	144	531	99
Temporary	168	19	187	72	94	21
TOTAL	**768**	**193**	**961**	**216**	**625**	**120**

Distribution of number of employees by type of contract and professional category	Indefinite		Temporary		Total	
	2025	2024	2025	2024	2025	2024
Department Director	29	37	0	0	29	37
Person in charge	165	319	2	17	167	336
Technician	118	245	3	21	121	266
Administrative Assistant	4	33	0	5	4	38
Operator	38	140	6	144	44	284
TOTAL	**354**	**774**	**11**	**187**	**365**	**961**

The annual average for the years ending December 31, 2025 and 2024, of permanent and temporary contracts by gender, age and professional category is as follows:

In relative terms

2025	Men	Women	Total	<30	30-49	>49
Indefinite	65.28%	18.52%	83.80%	14.26%	57.42%	12.12%
Temporary	15.04%	1.16%	16.20%	5.04%	8.92%	2.24%
TOTAL	80.32%	19.68%	100%	19.30%	66.34%	14.36%

2024	Men	Women	Total	<30	30-49	>49
Indefinite	55.34%	15.01%	70.35%	16.37%	44.99%	8.98%
Temporary	25.68%	3.97%	29.65%	12.73%	14.55%	2.38%
TOTAL	81.02%	18.98%	100%	29.10%	59.54%	11.36%

2025	Indefinite	Temporary	Total
Department Director	4.07%	0	4.07%
Person in charge	30.46%	1.07%	31.53%
Technician	21.24%	1.45%	22.69%
Administrative Assistant	5.82%	0.10%	5.92%
Operator	22.21%	13.58%	35.79%
TOTAL	83.80%	16.20%	100%

2024	Indefinite	Temporary	Total
Department Director	3.18%	0	3.18%
Person in charge	24.04%	2.06%	26.1%
Technician	19.88%	2.29%	22.17%
Administrative Assistant	2.24%	0.33%	2.57%
Operator	21%	24.98%	45.98%
TOTAL	70.34%	29.66	100%

In absolute values

2025	Men	Women	Total	<30	30-49	>49
Indefinite	673	191	864	147	592	125
Temporary	155	12	167	52	92	23
TOTAL	828	203	1031	199	684	148

2024	Men	Women	Total	<30	30-49	>49
Indefinite	1183	321	1504	350	962	192
Temporary	549	85	634	272	311	51
TOTAL	1,732	406	2.138	622	1.273	243

2025	Indefinite	Temporary	Total
Department Director	42	0	42
Person in charge	314	11	325
Technician	219	15	234
Administrative Assistant	60	1	61
Operator	229	140	369
TOTAL	864	167	1031

2024	Indefinite	Temporary	Total
Department Director	68	0	68
Person in charge	514	44	558
Technician	425	49	474
Administrative Assistant	48	7	55
Operator	449	534	983
TOTAL	1.504	634	2.138

The total number of layoffs by gender, age and professional classification, during the fiscal years 2025 and 2024, is as follows:

Number of layoffs by gender and age	Men	Women	Total	<30	30-49	>49
2025	429	86	515 (*)	131	299	85
2024	648	133	781 (*)	297	391	93

(*) Contract expirations have been taken into account in the dismissals

Number of layoffs by professional category	2025	2024
Department Director	10	13
Person in charge	105	98
Technician	61	123
Administrative Assistant	45	14
Operator	294	533
TOTAL	**515**	**781**

The Company's average remuneration during the 2025 and 2024 financial years was as follows, broken down by gender, age and professional category:

Average salaries (€)	Men	Women	<30	30-49	>49
2025	27,460	31,327	15.175	29,815	38.032
2024	19,651	22.005	9.334	23,636	29.118

Average employee remuneration by professional category (€)	2025	2024
Department Director	113,952	115.371
Person in charge	40.475	35,598
Technician	27,624	19,622
Administrative Assistant	20.134	13,247
Operator	7,860	5,322

The average remuneration of Directors and Senior Management members in 2025, paid by both the parent company and any other subsidiary, including average remuneration, variable compensation, allowances, severance pay and payments to long-term savings plans, is summarized as follows:

Average salaries (€)	2025		2024	
	Women	Man	Women	Man
Advisors	- (*)	106.904	38,985	136,529
Senior Management	161,275	146.234	150,000(**)	147,000 (**)

(*) No woman received remuneration in 2025 as a Councilor

(**) Corrected value

The salary gap by professional category obtained for the years 2025 and 2024 is as follows:

Wage gap (%)	2025	2024
Department Director	- 2, 16	6.40
Person in charge	5.04	1.92
Technician	8.02	2.15
Administrative Assistant	29.22	27.44
Operator	- 65.57	8.87

The ratio between the minimum wage paid by Soltec and the national minimum wage during the years 2025 and 2024 is greater than one for Spain, with the Company committing, in the rest of its subsidiaries, to respect the local regulations in force both at the level of collective agreements or agreements related to the establishment of a local minimum wage.

Work organization

The annual average for the fiscal years ending December 31, 2025 and 2024, of full-time and part-time employees by gender, age, and professional category is as follows:

In relative terms

2025	Men	Women	Total	<30	30-49	>49
Full-time	80.12%	18.91%	99.03%	19.21%	65,66	14.16%
Part-time	0.19%	0.78%	0.97%	0.10%	0.68%	0.19%
TOTAL	**80.31%**	**19.69%**	**100%**	**19.31%**	**66.34%**	**14.35%**

2025	Complete	Partial	Total
Department Director	4.07%	0	4.2%
Person in charge	30.84%	0.68%	31.7%
Technician	22.60%	0.10%	22.64%
Administrative Assistant	5.82%	0.10%	5.95%
Operator	35.69%	0.10%	35.51%
TOTAL	**99.02** %	**0.98%**	**100%**

2024	Men	Women	Total	<30	30-49	>49
Full-time	80.63%	18.57%	99.2%	28.95%	59.03%	11.2%2
Part-time	0.37%	0.42%	0.79%	0.14%	0.51%	0.14%
TOTAL	**81%**	**19.04%**	**100%**	**29.09%**	**59.47%**	**11.36%**

2024	Complete	Partial	Total
Department Director	3.13%	0.06%	3.18%
Person in charge	25.72%	0.37%	26.09%
Technician	21.94%	0.23%	22.17%
Administrative Assistant	2.43%	0.14%	2.57%
Operator	45.98%	0	45.98%
TOTAL	**99.2%**	**0.80%**	**100%**

In absolute values

2025	Men	Women	Total	<30	30-49	>49
Full-time	826	195	1021	198	677	146
Part-time	2	8	10	1	7	2
TOTAL	**828**	**203**	**1031**	**199**	**684**	**148**

2025	Complete	Partial	Total
Department Director	42	0	42
Person in charge	318	7	325
Technician	233	1	234
Administrative Assistant	60	1	61
Operator	368	1	369
TOTAL	**1021**	**10**	**1031**

2024	Men	Women	Total	<30	30-49	>49
Full-time	1724	397	2121	619	1262	240
Part-time	8	9	17	3	11	3
TOTAL	**1732**	**406**	**2138**	**622**	**1273**	**243**

2024	Complete	Partial	Total
Department Director	67	1	68
Person in charge	550	8	558
Technician	469	5	474
Administrative Assistant	52	3	55
Operator	983	0	983
TOTAL	**2121**	**17**	**2138**

The number of employees who have enjoyed parental leave during the financial years 2025 and 2024 is as follows:

Number of employees on parental leave	2025	2024
Men	11	33
Women	8	16
Total	**19**	**49**

The total number of hours of absenteeism during the 2025 and 2024 financial years is as follows:

	Hours of absenteeism	% of total hours
2025	27,291.87	2.08%
2024	109,515.78	3.46%

Safety and Health

The main indicators related to safety and health during the 2025 and 2024 fiscal years are as follows:

	2025			2024		
	Men	Women	Total	Men	Women	Total
Workplace accident frequency index (1)	2.7	0	**2.7**	0.67	0	**0.67**
Workplace accident severity index (2)	0.1	0	**0.1**	0.03	0	**0.03**
Number of work accidents (3)	3	0	**3**	2	0	**2**
Number of fatalities	0	0	**0**	0	0	**0**
Number of occupational diseases (4)	0	0	**0**	0	0	**0**

1. Number of work-related accidents resulting in sick leave per million hours worked.
2. Number of days not worked due to accidents that occurred during working hours, per thousand hours worked.
3. All of the work accidents have been classified as minor.
4. Disease contracted as a result of work performed for others or on one's own account in the activities specified in the table of Occupational Diseases.

Social relationships

The percentages of collective agreement coverage for the most relevant geographical areas during the years 2025 and 2024 are as follows:

% coverage of collective agreements	2025	2024
Spain	100	100
Brazil	100	100

*The rest of the countries are subject to current labor regulations.

Training

The training hours provided by professional category and geographical area during the 2025 and 2024 fiscal years are as follows:

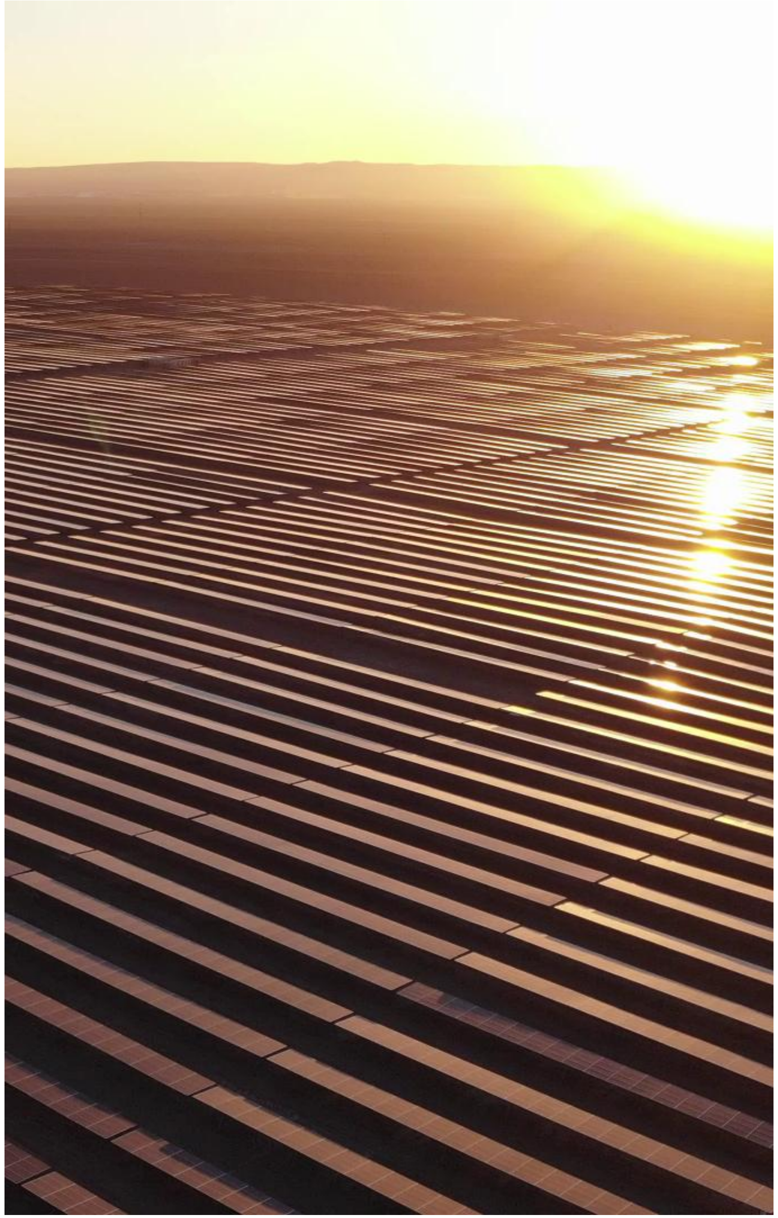
Training hours by professional category	2025	2024
Department Director	192	155.5
Person in charge	961	1,845.5
Technician	926.5	1274
Administrative Assistant	372	3,132.5
Operator	1,892.5	1,706.5
TOTAL	**4,344**	**8.114**

% of total hours by geographic area	2025	2024
Brazil	46.27%	65.43%
Spain	53.22 %	32.27%
USA	0.51 %	2.30%

Accessibility

The distribution of people with disabilities by professional category during the years 2025 and 2024 is as follows:

Number of employees with disabilities by category	2025	2024
Department Director	-	-
Person in charge	-	2
Technician	3	4
Administrative Assistant	-	-
Operator	-	-
TOTAL	3	6



TAX INFORMATION

The distribution by country of the results and the income taxes paid during the 2025 financial year is detailed below:

Fiscal Year 2025 (Thousands of euros)					
	Earnings before taxes	Results after taxes	Taxes accrued	Taxes paid (collected)	Grants received
Spain	67,715	68,434	719	85	251
Brazil	-18,000	-18.653	-653	378	0
Mexico	-209	-212	-3	128	0
Chili	1,897	1,895	-2	1	0
Argentina	-242	-242	-	-	0
Peru	324	324	-	-	0
USA	-7.842	-7.974	-132	137	0
Colombia	-4.875	-4.875	-	17	0
Italy	-10.097	-10.159	-62	210	0
Others	-8.206	-8.204	2	27	0
TOTAL	**20,464**	**20.334**	**-130**	**983**	**251**

Fiscal Year 2024 (Thousands of euros)					
	Earnings before taxes	Results after taxes	Taxes accrued	Taxes paid (collected)	Grants received
Spain	-20.888	-93.122	-19.885	110	265
Brazil	-9.405	-48.246	-6.685	965	
Mexico	850	-399	-1.249	115	
Chili	-3.369	-3.784	-416	7	
Argentina	1.138	1.138	-	-	
Peru	187	73	-114	-	
USA	-28.724	-29,699	-975	-	
Colombia	-23.148	-24.548	-1.401	1.032	
Italy	-971	-1.472	-501	44	
Others	-3.715	-3.699	16	13	
TOTAL	**-88.044**	**-203.759**	**-31.209**	**2.286**	**265**

ANNEX II: TAXONOMY INDICATORS

Table 1: Proportion of turnover from products or services associated with economic activities that conform to the taxonomy – disclosure corresponding to the year 2025

Exercise financial		2025		Criteria of contribution substantial						Criteria for absence of damage significant ("No causes harm significant")									
Activities economic	Codes	Volume of business	Proportion of the turnover, year 2025	Mitigation of the change climatic	Adaptation to the change climatic	Resources water resources and sailors	Economy circular	Pollution	Biodiversity and ecosystems	Mitigation of the change climatic	Adaptation to the change climatic	Resources water resources and sailors	Economy circular	Pollution	Biodiversity and ecosystems	Guarantees minimums	Proportion of turnover that fits the taxonomy (A.1) or eligible according to the taxonomy (A.2), year 2024	Category activity facilitator	Activity category transition
Text		Mn euros	%	S; N; N/EL	S; N; N/EL	S; N; N/EL	S; N; N/EL	S; N; N/EL	S; N; N/EL	S/N	S/N	S/N	S/N	S/N	S/N	S/N	%	F	T
TO. ACTIVITIES ELIGIBLE ACCORDING TO THE TAXONOMY																			
A.1. Activities environmentally sustainable (that HE adjust to the taxonomy)																			
Manufacturing of technologies of energy renewable	CCM 3.1	63,408	90.93%	S	N	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	95.69 %	F	
Generation of electricity through technology solar photovoltaics	CCM 4.1	-	0.00%	S	N	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	0.0 %		
Facility, maintenance and repair of renewable energy technologies	CCM 7.6	6,326	9.07%	S	N	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	4.31 %	F	
Volume of business of activities environmentally sustainable (that HE adjust to the taxonomy) (A.1)		**69,734**	**100%**	**100%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**S**	**S**	**S**	**S**	**S**	**S**	**S**	**100 %**		
Of the which is it: facilitators		69,734	100.00% (1)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	S	S	S	S	S	S	S	100%	F	
Of the which is it: of transition		0.0	0.0	0.0%						S	S	S	S	S	S	S	0.0		T
A.2 Activities eligible according to the taxonomy, but No environmentally sustainable (activities that No HE adjust to the taxonomy)																			
				HE; N/EL	HE; N/EL	HE; N/EL	HE; N/EL	HE; N/EL	HE; N/EL										
Volume of business of activities eligible according to the taxonomy, but No environmentally sustainable (activities that No HE adjust to the taxonomy) (A.2)		**0.0 €**	**0.0%**	**N/EL**	**N/EL**	**N/EL**	**N/EL**	**N/EL**	**N/EL**								**0.0%**		
TO. Volume of business of activities eligible according to the taxonomy (A.1+A.2)		69,734	100 %	100 %	0.0%	0.0%	0.0%	0.0%	0.0%								100%		
B. ACTIVITIES NO ELIGIBLE ACCORDING TO THE TAXONOMY																			
Volume of business of activities No eligible according to the taxonomy		0.0	0.0 %																
TOTAL		69,734	100 %																

(1) **Environmental enabling activities in relation to total turnover**

Table 2: Proportion of turnover/total turnover that meets the taxonomy by objective and proportion of turnover/total turnover eligible according to taxonomy by objective (subscript c Template Annex II Delegated Regulation 2023/2486

	Turnover ratio/total turnover	
	that fits the taxonomy by objective	eligible according to the objective taxonomy
CCM	100%	100%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
EC	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

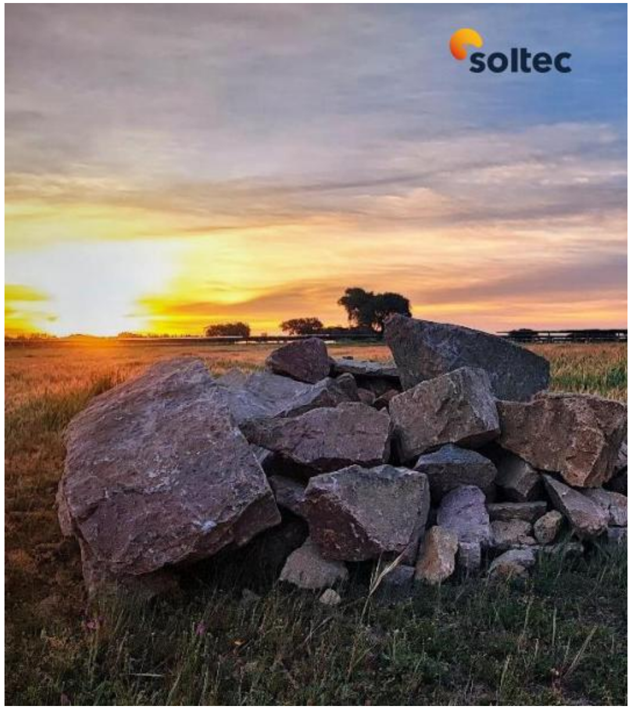


Table 3: Proportion of CapEx from products or services associated with economic activities that conform to the taxonomy – disclosure corresponding to the year 2025

Exercise financial	2025			Criteria of contribution substantial						Criteria for absence of damage significant ("No causes harm significant")									
Activities economic	Codes	CAPEX	Proportion of the CapEx , year 2025	Mitigation of the change climatic	Adaptation to the change climatic	Resources water resources and sailors	Economy circular	Pollution	Biodiversity and ecosystems	Mitigation of the change climatic	Adaptation to the change climatic	Resources water resources and sailors	Economy circular	Pollution	Biodiversity and ecosystems	Guarantees minimums	Proportion of CapEx that fits the taxonomy (A.1) or eligible according to the taxonomy (A.2), year 2024	Category activity facilitator	Activity category transition
Text		Mn euros	%	S; N; N/EL	S; N; N/EL	S; N; N/EL	S; N; N/EL	S; N; N/EL	S; N; N/EL	S/N	S/N	S/N	S/N	S/N	S/N	S/N	%	F	T
TO. ACTIVITIES ELIGIBLE ACCORDING TO THE TAXONOMY																			
A.1. Activities environmentally sustainable (that HE adjust to the taxonomy)																			
Manufacturing of technologies of energy renewable	CCM 3.1	0.194	4.55 %	S	N	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	16.06 %	F	
Generation of electricity through technology solar photovoltaics	CCM 4.1	3,795	89.02 %	S	N	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	64.59 %		
Facility, maintenance and repair of renewable energy technologies	CCM 7.6	0.240	5.63 %	S	N	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	9.26 %	F	
Volume of business of activities environmentally sustainable (that HE adjust to the taxonomy) (A.1)		4,229	99.20%	99.20%	0.0%	0.0%	0.0%	0.0%	0.0%	S	S	S	S	S	S	S	89.91 %		
Of the which is it: facilitators		0.434	10.18% (1)	24.87%	0.0%	0.0%	0.0%	0.0%	0.0%	S	S	S	S	S	S	S	25.32%	F	
Of the which is it: of transition		0.0	0.0%							S	S	S	S	S	S	S	0.0		T
A.2 Activities eligible according to the taxonomy, but No environmentally sustainable (activities that No HE adjust to the taxonomy)																			
				HE; N/EL	HE; N/EL	HE; N/EL	HE; N/EL	HE; N/EL	HE; N/EL										
CAPEX of activities eligible according to the taxonomy, but No environmentally sustainable (activities that No HE adjust to the taxonomy) (A.2)		0.0 €	0.0%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
TO. CAPEX of activities eligible according to the taxonomy (A.1+A.2)		4,229	99.20 %	100 %	0.0%	0.0%	0.0%	0.0%	0.0%								89.91%		
B. ACTIVITIES NO ELIGIBLE ACCORDING TO THE TAXONOMY																			
CAPEX of activities No eligible according to the taxonomy		0.034	0.80 %																
TOTAL		4,263	100 %																

(1) Environmental enabling activities in relation to TOTAL CapEx

Table 4: Proportion of CapEx / Total CapEx that fits the taxonomy by objective and proportion of CapEx / Total CapEx eligible according to taxonomy by objective (subscript c Template Annex II Delegated Regulation 2023/2486)

	CapEx / Total CapEx ratio	
	that fits the taxonomy by objective	eligible according to the objective taxonomy
CCM	99.20%	99.20%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
EC	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

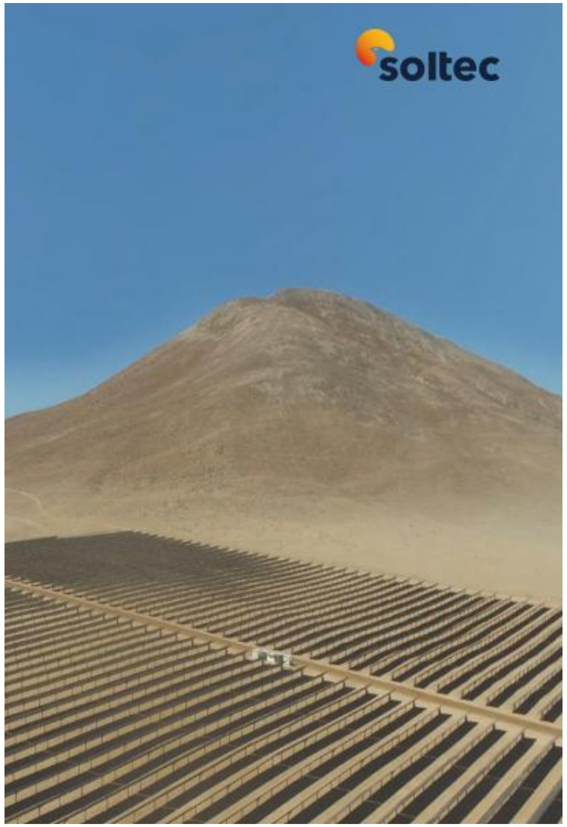


Table 5: Proportion of OpEx from products or services associated with economic activities that conform to the taxonomy – disclosure corresponding to the year 2025

Exercise financial	2025			Criteria of contribution substantial						Criteria for absence of damage significant ("No causes harm significant")									
Activities economic	Codes	OPEX	Proportion of the OpEx , year 2025	Mitigation of the change climatic	Adaptation to the change climatic	Resources water resources and sailors	Economy circular	Pollution	Biodiversity and ecosystems	Mitigation of the change climatic	Adaptation to the change climatic	Resources water resources and sailors	Economy circular	Pollution	Biodiversity and ecosystems	Guarantees minimums	Proportion of OpEx that fits the taxonomy (A.1) or eligible according to the taxonomy (A.2), year 2024	Category activity facilitator	Activity category transition
Text		Mn euros	%	S; N; N/EL	S; N; N/EL	S; N; N/EL	S; N; N/EL	S; N; N/EL	S; N; N/EL	S/N	S/N	S/N	S/N	S/N	S/N	S/N	%	F	T
TO. ACTIVITIES ELIGIBLE ACCORDING TO THE TAXONOMY																			
A.1. Activities environmentally sustainable (that HE adjust to the taxonomy)																			
Manufacturing of technologies of energy renewable	CCM 3.1	0.887	29.92 %	S	N	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	7.16 %	F	
Generation of electricity through technology solar photovoltaics	CCM 4.1	0.000	0.00 %	S	N	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	0.00 %		
Facility, maintenance and repair of renewable energy technologies	CCM 7.6	1,242	41.90 %	S	N	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	67.13 %	F	
Volume of business of activities environmentally sustainable (that HE adjust to the taxonomy) (A.1)		**2,129**	**71.82%**	**71.82%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**S**	**S**	**S**	**S**	**S**	**S**	**S**	**74.29 %**		
Of the which is it: facilitators		2,129	71.82% (1)	71.82 %	0.0%	0.0%	0.0%	0.0%	0.0%	S	S	S	S	S	S	S	74.29%	F	
Of the which is it: of transition		0.0	0.0%							S	S	S	S	S	S	S	0.0		T
A.2 Activities eligible according to the taxonomy, but No environmentally sustainable (activities that No HE adjust to the taxonomy)																			
				HE; N/EL	HE; N/EL	HE; N/EL	HE; N/EL	HE; N/EL	HE; N/EL										
CAPEX of activities eligible according to the taxonomy, but No environmentally sustainable (activities that No HE adjust to the taxonomy) (A.2)		**0.0 €**	**0.0%**	**N/EL**	**N/EL**	**N/EL**	**N/EL**	**N/EL**	**N/EL**								**0.0%**		
TO. CAPEX of activities eligible according to the taxonomy (A.1+A.2)		2,129	71.82%	100 %	0.0%	0.0%	0.0%	0.0%	0.0%								74.29%		
B. ACTIVITIES NO ELIGIBLE ACCORDING TO THE TAXONOMY																			
CAPEX of activities No eligible according to the taxonomy		0.836	28.18 %																
TOTAL		2,965	100 %																

(1) **Environmental enabling activities in relation to TOTAL OpEx**

Table 6: Proportion of OpEx / Total OpEx that fits the taxonomy by objective and proportion of OpEx / Total OpEx eligible according to taxonomy by objective (subscript c Template Annex II Delegated Regulation 2023/2486)

	OpEx / Total OpEx ratio	
	that fits the taxonomy by objective	eligible according to the objective taxonomy
CCM	71.82%	71.82%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
EC	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

ANNEX III: INDEX OF CONTENTS REQUIRED BY LAW 11/2018

Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			**Standard used**	**Chapter of reference**
Model business	**Description of the model of business**	Brief description of the business model, including its business environment, organization and structure, the markets in which it operates, its objectives and strategies, and the main factors and trends that may affect its future evolution.	GRI 2-1 Organization Details GRI 2-2 Societies included in the organization's sustainability reports GRI 2-6 Activities, value chain and other business relationships GRI 2-9 Governance structure and composition GRI 2-13 Delegation of responsibility for impact management GRI 2-23 Strategies, policies and practices GRI 2-29 Approach to stakeholder engagement GRI 3-1 Process for determining materiality GRI 3-2 Material Item List	▪ 1.1 Business model (pages 6 and 7) ▪ 1.4 Materiality (pp. 11-14) ▪ 1.5 Business areas (pages 15 to 22) ▪ 4.5 Commitment to the customer (pp. 103-107) ▪ 4.6 Sustainable supply chain management (pp. 108-113)
Information on environmental issues	**Policies**	Policies that it applies, including the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and for verification and control, as well as the measures that have been adopted.	GRI 2-23 Strategies, policies and practices GRI 2-24 Incorporation of political commitments	▪ 2.5 Contribution to sustainable development (pp. 43-47) ▪ 3.1 Soltec's commitment to the environment (pp. 59-62)
Information on environmental issues	**Main risks**	The main risks related to these issues linked to the activities, including, where relevant and proportionate, business relationships, products, or services that could have negative effects in these areas, and how these risks are managed, explaining the procedures used to detect and assess them in accordance with the relevant national, European, or international frameworks for each matter. Information on any impacts identified should be included, providing a breakdown of these impacts, particularly the main short-, medium-, and long-term risks.	GRI 207-2 Fiscal governance, control and risk management	▪ 2.4 Risk Management (pp. 39-43)

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Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			Standard used	Chapter of reference
Information on environmental issues	Environmental management	Current and foreseeable effects of the company's activities on the environment and, where applicable, on health and safety	GRI 2-23 Strategies, policies and practices	▪ 2.5 Contribution to sustainable development (pp. 43-47) ▪ 3.1 Soltec's commitment to the environment (pp. 59-62)
		Environmental assessment or certification procedures	GRI 2-23 Strategies, policies and practices	▪ 3.1 Soltec's commitment to the environment (pp. 59-62)
		Resources dedicated to the prevention of environmental risks	GRI 2-23 Strategies, policies and practices	▪ 3.1 Soltec's commitment to the environment (pp. 59-62)
		Application of the precautionary principle	GRI 2-23 Strategies, policies and practices	▪ 3.1 Soltec's commitment to the environment (pp. 59-62)
		Provisions and guarantees for environmental risks	GRI 2-27 Compliance with laws and regulations	▪ 3.1 Soltec's commitment to the environment (pp. 59-62) **The Group does not have significant provisions and guarantees for environmental risks**
Information on environmental issues	Pollution	Measures to prevent, reduce or repair carbon emissions that seriously affect the environment, taking into account any form of air pollution specific to an activity, including noise and light pollution.	GRI 305-5 Reduction of GHG emissions	▪ 3.2 Climate Change (pp. 63-69) ▪ 3.3 Energy sustainability and the fight against climate change (p. 69) **Regarding light pollution resulting from the company's activity, there are no adverse effects in this respect.**
	Circular Economy and waste prevention and management	Prevention measures, recycling, reuse, other forms of recovery and waste disposal. Actions to combat food waste.	GRI 301-1 Materials used by weight or volume GRI 301-2 Recycled inputs used GRI 301-3 Recovered packaging products and materials GRI 306-2 Waste by type and disposal method GRI 306-4 Transport of hazardous waste	▪ 3.4 Responsible use of resources and circular economy (pp. 69-73) ▪ Annex I: Sustainability Indicators (p. 118) **Due to Soltec's business model, food waste is not a material issue for the organization.**

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Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			Standard used	Chapter of reference
Information on environmental issues	Sustainable use of resources	Water consumption and water supply in accordance with local limitations	GRI 303-1 Interaction with water as a shared resource GRI 303-2 Management of impacts related to water discharge GRI 303-3 Water Extraction GRI 303-5 Water consumption GRI 303-4 Water Discharge	▪ 3.4 Responsible use of resources and circular economy (pp. 69-73) **This aspect is not considered material since water consumption is primarily for human use, with no water used in the manufacturing process.**
Information on environmental issues	Sustainable use of resources	Consumption of raw materials and the measures taken to improve the efficiency of their use	GRI 3-3 Management of material aspects (with a view to GRI 300) GRI 301-1 Materials used by weight or volume	▪ 3.4 Responsible use of resources and circular economy (pp. 69-73) ▪ Annex I: Sustainability Indicators (p. 118)
Information on environmental issues	Sustainable use of resources	Energy: Direct and indirect consumption; Measures taken to improve energy efficiency; Use of renewable energy	GRI 3-3 Management of material aspects (with a view to GRI 302 Energy) GRI 302-1 Energy consumption within the organization (energy from renewable and non-renewable sources) GRI 302-2 Energy consumption outside the organization GRI 302-4 Reduction of energy consumption	▪ 3.1 Soltec's commitment to the environment (pp. 59-62) ▪ 3.2 Climate Change (pp. 63-69) ▪ Annex I: Sustainability Indicators (p. 118)
Information on environmental issues	Climate Change	Greenhouse Gas Emissions	GRI 305-1 Direct GHG emissions (scope 1) GRI 305-2 Indirect GHG emissions from power generation (scope 2)	▪ 3.1 Soltec's commitment to the environment (pp. 59-62) ▪ 3.2 Climate Change (pp. 63-69) ▪ Annex I: Sustainability Indicators (p. 118)
Information on environmental issues	Climate Change	The measures adopted to adapt to the consequences of Climate Change	GRI 3-3 Management of material aspects (with a view to GRI 300)	▪ 2.4 Risk Management (pp. 39-43) ▪ 2.5 Contribution to sustainable development (pp. 43-47)
Information on environmental issues	Climate Change	Voluntarily established medium and long-term reduction targets to reduce GHG emissions and means implemented for this purpose.	GRI 305-5 Reduction of GHG emissions	▪ 3.2 Climate Change (pp. 63-69) ▪ 3.1 Soltec's commitment to the environment (pp. 59-62)
Information on environmental issues	Biodiversity protection	Measures taken to preserve or restore biodiversity and impacts caused by actions or operations in protected areas	GRI 304-2 Significant impacts of activities, products and services on biodiversity GRI 304-3 Habitats protected or restored	▪ 3.5 Protection of biodiversity (pp. 73-76)

Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			**Standard used**	**Chapter of reference**
Information on social and personnel matters	**Policies**	Policies applied by the company, including the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and for verification and control, as well as the measures that have been adopted.	GRI 2-23 Commitments and Policies GRI 2-24 Incorporation of commitments and policies	▪ 2.5 Contribution to sustainable development (pp. 43-47) ▪ 2.2 Ethics and integrity (pages 25 to 32) ▪ 4.2 Human rights (pp. 81-84) ▪ 4.3 People First (pp. 85-100) ▪ Safety and health of workers (pp. 95-97)
Information on social and personnel matters	**Main risks**	The main risks related to these issues linked to the company's activities, including, where relevant and proportionate, its business relationships, products, or services that may have negative effects in these areas, and how the company manages these risks, explaining the procedures used to detect and assess them in accordance with the relevant national, European, or international frameworks for each matter. Information on any impacts identified should be included, providing a breakdown of these impacts, particularly the main short-, medium-, and long-term risks.	GRI 207-2 Fiscal governance, control and risk management	▪ 2.4 Risk Management (pp. 39-43)
Information on social and personnel matters	**Employment**	Total number and distribution of employees by gender, age, country, and professional classification	GRI 2-7 Employees GRI 405-1 Diversity of governing bodies and employees GRI 401-1 New employee recruitment and staff turnover	▪ 4.3 People First (pp. 85-100) ▪ Annex I: Sustainability indicators (pages 120 to 123)
		Total number and distribution of employment contract types	GRI 2-7 Employees	▪ 4.3 People first (pp. 85-100) ▪ Annex I: Sustainability indicators (pages 120 to 123)
Information on social and personnel matters	**Employment**	Average annual number of permanent, temporary and part-time contracts by gender, age and professional classification	GRI 2-7 Employees Total number of employees by contract (indefinite/temporary and full/part) by gender and region, average age and professional classification.	▪ Annex I: Sustainability Indicators (p. 121)
		Number of layoffs by gender, age, and professional classification	GRI 401-1 New employee recruitment and staff turnover Number of layoffs by professional classification	▪ 4.3 People First (pp. 85-100) ▪ Annex I: Sustainability Indicators (pp. 122 and 123)
		Average remuneration and its evolution broken down by gender, age and professional classification or equal value	GRI 405-2 Ratio between basic salary and remuneration of women and men Average remuneration by gender, age and professional classification and its evolution. For its calculation, the total salary receipts in cash and remuneration in kind must be taken into account, so the benefits referred to in GRI 401-2 must be considered for the calculation.	▪ 4.3 People First (pp. 85-100) ▪ Annex I: Sustainability Indicators (p. 123)

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Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			**Standard used**	**Chapter of reference**
Information on social and personnel matters	**Employment**	Wage gap	GRI 405-2 Ratio between basic salary and remuneration of women and men GRI 202-1 Ratio of standard entry-level salary by gender to local minimum wage (this indicator is used because, as one progresses in a career, various factors can influence the definition of each person's remuneration). GRI 405-2 Ratio between basic salary and remuneration of women and men. *OECD: The gender pay gap is defined as the difference between the average earnings of men and women relative to the average earnings of men	▪ 4.3 People First (pp. 85-100) ▪ Annex I: Sustainability Indicators (p. 123)
Information on social and personnel matters	**Employment**	The average remuneration of directors and managers, including variable remuneration, allowances, compensation, payments to long-term savings plans and any other income broken down by gender.	GRI 2-19 Compensation Policies. GRI 201-3 Obligations arising from social benefit schemes and other retirement schemes. Information broken down by gender.	▪ Annex I: Sustainability Indicators (p. 123)
Information on social and personnel matters	**Employment**	Implementation of work disconnection measures	GRI 3-3 Management of material aspects (with a view to GRI 300)	▪ 4.3 People first (p. 98) Soltec, in its human resources policy, recognizes the right to digital disconnection in the workplace for its employees so that, outside of legally or conventionally established working time, their rest time, leave and holidays, as well as their personal and family privacy, are respected.
Information on social and personnel matters	**Employment**	Employees with disabilities	GRI 405-1 Diversity of governing bodies and employees	▪ 4.3 People first (pp. 90-92) ▪ Annex I: Sustainability Indicators (p. 126)
	Work organization	Organization of working time	GRI 3-3 Management of material aspects (with a view to GRI 300)	▪ 4.3 People first (p. 90) ▪ Annex I: Sustainability Indicators (p. 124)
		Number of hours of absenteeism	Internal work schedule record	▪ Annex I: Sustainability Indicators (p. 125)
		Measures aimed at facilitating the enjoyment of work-life balance and promoting the shared responsibility of both parents in exercising this right.	GRI 401-3 Parental Leave Management approach to other work-life balance measures	▪ 4.3 People first (p. 98) ▪ Annex I: Sustainability Indicators (p. 125)

Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			**Standard used**	**Chapter of reference**
Information on social and personnel matters	**Health and safety**	Health and safety conditions at work	GRI 403-1 Occupational Health and Safety Management System GRI 403-2 Hazard identification, risk assessment and incident investigation GRI 403-3 Occupational health services GRI 403-4 Occupational health and safety issues addressed in formal agreements with the legal representatives of the workers GRI 403-5 Training of workers on health and safety at work GRI 403-6 Promoting the health of workers GRI 403-7 Prevention and mitigation of the impacts on the health and safety of workers directly linked to commercial relationships GRI 403-8 Coverage of the occupational health and safety management system	▪ 4.4 Safety and health (pp. 101 to 103)
		Work accidents (frequency and severity) broken down by gender	GRI 403-9 Workplace Accident Injuries	▪ 4.4 Safety and health (pp. 101 to 103) ▪ Annex I: Sustainability Indicators (p. 125)
		Occupational diseases (frequency and severity) disaggregated by gender	GRI 403-10 Occupational illnesses and diseases	▪ 4.4 Safety and health (pp. 101 to 103) ▪ Annex I: Sustainability Indicators (p. 125)
Information on social issues and relating to personnel	**Social relationships**	Organization of social dialogue, including procedures for informing and consulting staff and negotiating with them	GRI 2-29 Stakeholder Engagement Approach (relating to trade unions and collective bargaining) GRI 2-16 Communicating critical concerns GRI 2-26 Mechanisms for seeking advice and raising concerns	▪ 1.3 Stakeholder groups (pp. 10 and 11) ▪ 4.1 Stakeholder Relations Model (pp. 78-80) ▪ 4.3 People first (pp. 88 and 99-101)
		Percentage of employees covered by collective agreement by country	GRI 2-30 Collective bargaining agreements Percentage broken down by country	▪ 4.3 People first (p. 88) ▪ Annex I: Sustainability Indicators (p. 120)
		Assessment of collective agreements, particularly in the field of occupational health and safety	GRI 403-4 Occupational health and safety issues addressed in formal agreements with the legal representatives of the workers GRI 2-30 Collective bargaining agreements	▪ 4.3 People first (pp. 88 and 89) ▪ Annex I: Sustainability Indicators (p. 120) ▪ 4.4 Safety and health (pp. 101 to 103)
		Mechanisms and procedures that the company has in place to promote employee involvement in the management of the company, in terms of information, consultation and participation	GRI 2-29 Stakeholder Engagement Approach	▪ 4.1 Stakeholder Relations Model (p. 80) ▪ 4.3 People first (pp. 84, 93 and 94)

Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			**Standard used**	**Chapter of reference**
Information on social and personnel matters	**Training**	Policies implemented in the field of training	GRI 404-2 Programs to improve employee skills and programs	▪ 4.3 People first (pp. 95-98)
		Total number of training hours by professional category	Total training hours.	▪ 4.3 People first (p. 97) ▪ Annex I: Sustainability Indicators (p. 125)
	Accessibility	Universal accessibility for people with disabilities	GRI 3-3 Management of material aspects (with a view to GRI 405 Diversity and equal opportunities and GRI 406 Non-discrimination)	▪ 4.3 People first (pp. 91 and 92)
Information on social and personnel matters	**Equality**	Measures adopted to promote equal treatment and opportunities between men and women	GRI 3-3 Management of material aspects (with a view to GRI 405 Diversity and equal opportunities) GRI 405-1 Diversity of governing bodies and employees	▪ 4.3 People first (pp. 90-93)
Information on social and personnel matters	**Equality**	Equality plans. Measures adopted to promote employment, protocols against sexual harassment and harassment based on sex	GRI 3-3 Management of material aspects (with a view to GRI 405 Diversity and equal opportunities and GRI 406 Non-discrimination)	▪ 4.3 People first (pp. 90-93)
		The integration and universal accessibility of people with disabilities	GRI 3-3 Management of material aspects (with a view to GRI 405 Diversity and equal opportunities and GRI 406 Non-discrimination)	▪ 4.3 People first (pp. 91 and 92)
Information on social and personnel matters	**Equality**	Policy against all types of discrimination and, where applicable, diversity management	GRI 3-3 Management of material aspects (with a view to GRI 405 Diversity and equal opportunities and GRI 406 Non-discrimination) GRI 406-1 Cases of discrimination and corrective actions taken	▪ 4.3 People first (pp. 90-93)
Information on respect for human rights	**Policy and risks**	Policies applied by the company and main risks, including among other aspects the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and for verification and control, as well as the measures that have been adopted		▪ 4.2 Human Rights (pp. 81-85)

Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			**Standard used**	**Chapter of reference**
Information on respect for human rights	**Rights Humans**	Application of human rights due diligence procedures	GRI 3-3 Management of material aspects (with a view to GRI 412 human rights assessment) GRI 2-23 Strategies, policies and practices	▪ 4.2 Human Rights (pp. 81-85)
		Prevention of risks of human rights violations and, where appropriate, measures to mitigate, manage and remedy possible abuses committed	GRI 2-27 Compliance with laws and regulations GRI 2-25 Processes for remedying negative impacts	▪ 2.2 Ethics and integrity (pages 25 to 27) ▪ 4.2 Human Rights (pp. 81-85)
		Complaints regarding cases of human rights violations	GRI 2-27 Compliance with laws and regulations GRI 2-25 Processes for remedying negative impacts GRI 406-1 Cases of discrimination and corrective actions taken	▪ 2.2 Ethics and integrity (pages 25 to 27) ▪ 4.2 Human Rights (pp. 81-85)
		Promotion and compliance with the provisions of the ILO's fundamental conventions relating to respect for freedom of association and the right to collective bargaining, the elimination of discrimination in employment and occupation, the elimination of forced or compulsory labor and the effective abolition of child labor	GRI 2-27 Compliance with laws and regulations GRI 2-23 Strategies, policies and practices	▪ 4.2 Human Rights (pp. 81-85)
Information relating to the fight against corruption and bribery	**Policies**	Policies applied by the company, including the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and for verification and control, as well as the measures that have been adopted	GRI 2-23 Commitments and Policies GRI 2-24 Incorporation of commitments and policies	▪ 2.5 Contribution to sustainable development (pp. 43-47) ▪ 2.2 Ethics and integrity (pages 23 to 33)
Information relating to the fight against corruption and bribery	**Main risks**	The main risks related to these issues linked to the company's activities, including, where relevant and proportionate, its business relationships, products, or services that may have negative effects in these areas, and how the company manages these risks, explaining the procedures used to detect and assess them in accordance with the relevant national, European, or international frameworks for each matter. Information on any impacts identified should be included, providing a breakdown of these impacts, particularly the main short-, medium-, and long-term risks.	GRI 207-2 Fiscal governance, control and risk management	▪ 2.2 Ethics and integrity (pages 25 to 27) ▪ 2.4 Risk Management (pp. 39-43)

Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			**Standard used**	**Chapter of reference**
Information relating to the fight against corruption and bribery	**Corruption and bribery**	Measures taken to prevent corruption and bribery	GRI 3-3 Management of material aspects (with a view to GRI 205 Anti-corruption) GRI 205-2 Communication and training on anti-corruption policies and procedures GRI 205-3 Confirmed corruption incidents and measures taken GRI 2-27 Compliance with laws and regulations GRI 2-23 Strategies, policies and practices	▪ 2.2 Ethics and integrity (pages 23 to 33)
		Measures to combat money laundering	GRI 3-3 Management of material aspects (with a view to GRI 205 Anti-corruption) GRI 2-27 Compliance with laws and regulations GRI 2-23 Strategies, policies and practices	▪ 2.2 Ethics and integrity (page 30)
	Corruption and bribery	Contributions to foundations and non-profit organizations	GRI 201-1 Direct economic value generated and distributed	▪ 4.7 Commitment to society and creation of shared value (pp. 114 and 115)
Information about society	**Policies**	Policies applied by the company, including the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and for verification and control, as well as the measures that have been adopted.	GRI 3-3 Management of material aspects GRI 2-23 Commitments and Policies GRI 2-24 Incorporation of commitments and policies	▪ 2.5 Contribution to sustainable development (pp. 43-47) ▪ 4.5 Commitment to the customer (pp. 103-108) ▪ 4.6 Sustainable supply chain management (pp. 108-114) ▪ 4.7 Commitment to society and creation of shared value (pp. 114 and 115)
Information about society	**Main risks**	The main risks related to these issues linked to the company's activities, including, where relevant and proportionate, its business relationships, products, or services that may have negative effects in these areas, and how the company manages these risks, explaining the procedures used to detect and assess them in accordance with the relevant national, European, or international frameworks for each matter. Information on any impacts identified should be included, providing a breakdown of these impacts, particularly the main short-, medium-, and long-term risks.	GRI 3-3 Management of material aspects GRI 207-2 Fiscal governance, control and risk management	▪ 2.4 Risk Management (pp. 39-43)
Information about society	**Company commitments to sustainable development**	Impact of the company's activity on employment and local development	GRI 2-6 Activities, value chain and other business relationships GRI 2-29 Approach to stakeholder engagement GRI 204-1 Proportion of spending on local suppliers	▪ 4.6 Sustainable supply chain management (pp. 108-114) ▪ 4.7 Commitment to society and creation of shared value (pp. 114 and 115)
		Impact of the company's activity on local populations and the territory	GRI 413-1 Operations with local community participation, impact assessments and development programs GRI 2-6 Activities, value chain and other business relationships GRI 2-29 Approach to stakeholder engagement	▪ 3.4 Responsible use of resources and circular economy (pp. 69-73) ▪ 4.7 Commitment to society and creation of shared value (pp. 114 and 115)

Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			**Standard used**	**Chapter of reference**
Information about society	**Company commitments to sustainable development**	Relationships maintained with actors in local communities and the methods of dialogue with them	GRI 2-29 Stakeholder Engagement Approach (Related to Community)	▪ 4.1 Stakeholder Relations Model (pp. 78-80) ▪ 4.7 Commitment to society and creation of shared value (pp. 114 and 115)
		Partnership and sponsorship actions	GRI 2-28 Member Associations	▪ 4.8 Sectoral presence (p. 115)
	Subcontracting and suppliers	Inclusion of social, gender equality and environmental issues in purchasing policy	GRI 2-6 Activities, value chain and other business relationships GRI 2-24 Incorporation of commitments and policies GRI 3-3 Management of material aspects (with a view to GRI 308 and GRI 414) GRI 204-1 Proportion of spending on local suppliers	▪ 4.6 Sustainable supply chain management (pp. 108-114)
		Consideration of social and environmental responsibility in relationships with suppliers and subcontractors	GRI 3-3 Management of material aspects (with a view to GRI 308 and GRI 414) GRI 2-6 Activities, value chain and other business relationships	▪ 4.6 Sustainable supply chain management (pp. 108-114)
		Monitoring and auditing systems and their results	GRI 3-3 Management of material issues GRI 2-6 Activities, value chain and other business relationships GRI 2-24 Incorporation of commitments and policies	▪ 4.6 Sustainable supply chain management (pp. 108-114)
Information about society	**Consumers**	Measures for the health and safety of consumers	GRI 2-16 Communicating critical concerns GRI 3-3 Management of material issues GRI 416-2 Non-compliance cases relating to the health and safety impacts of product and service categories	▪ 4.5 Commitment to the customer (pp. 103-108)
		Complaint systems, complaints received and their resolution	GRI 2-25 Processes for remedying negative impacts	▪ 4.5 Commitment to the customer (pp. 103-108)
	Tax information	Benefits obtained by country	GRI 207-4 Country-by-Country Reporting	▪ 4.9 Tax information (p. 119) and Annex I: Sustainability indicators (p. 127)
		Taxes on profits paid	GRI 207-4 Country-by-Country Reporting	▪ 4.9 Tax information (p. 119) and Annex I: Sustainability indicators (p. 127)
		Public subsidies received	GRI 201-4 Financial assistance received from the government	▪ 4.9 Tax information (p. 119) and Annex I: Sustainability indicators (p. 127)

ANNEX IV: INTEROPERABILITY BETWEEN GRI STANDARDS AND THE ESRS

Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			**Standard used**	**Chapter of reference**
Model business	**Description of the model of business**	Brief description of the business model, including its business environment, organization and structure, the markets in which it operates, its objectives and strategies, and the main factors and trends that may affect its future evolution.	GRI 2-1 Organization Details	Requirement of Directive 2013/34/EU
			GRI 2-2 Societies included in the organization's sustainability reports	ESRS 1 5.1; ESRS 2 BP-1§5(a) and (b) i
			GRI 2-6 Activities, value chain and other business relationships	ESRS 2 SBM-1 §40 (a) to (b)
			GRI 2-9 Governance structure and composition	ESRS 2 GOV-1 §21, §22(a), §23; ESRS G1 §5(b)
			GRI 2-13 Delegation of responsibility for impact management	ESRS 2 GOV-1 §22(c) i ; GOV-2 §26(a); ESRS G1 G1-3 §18(c)
			GRI 2-23 Strategies, policies and practices	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR 1 (b)
			GRI 2-29 Approach to stakeholder engagement	ESRS 2 SMB-2 §45 (a) i to (a) iv; ESRS S1 S1-1 §20(b); S1-2 §25, §27 (e) and §28; ESRS S2 S2-1 §17(b); S2-2 §20, §22 (e) and §23; ESRS S3 S3-1 §16(b); S3-2 §19, §21 (d) and §22; ESRS S4 S4-1 §16(b); S4-2 §18, §20 (d) and §21
			GRI 3-1 Process for determining materiality	ESRS 2 BP-1 §AR 1 (a); IRO-1 §53(b) ii to (b) iv
			GRI 3-2 Material Item List	ESRS 2 SBM-3 §48 (a) and (g)
Information on environmental issues	**Policies**	Policies that it applies, including the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and for verification and control, as well as the measures that have been adopted.	GRI 2-23 Strategies, policies and practices	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR 1 (b)

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			GRI 2-24 Incorporation of political commitments	ESRS 2 GOV-2 §26(b); MDR-P §65(c); ESRS S1 S1-4 §AR 35; ESRS S2 S2-4 §AR 30; ESRS S3 S3-4 §AR 27; ESRS S4 S4-4 §AR 27; ESRS G1 G1-1 §9 and §10 (g)
Information on environmental issues	**Main risks**	The main risks related to these issues linked to the activities, including, where relevant and proportionate, business relationships, products, or services that could have negative effects in these areas, and how these risks are managed, explaining the procedures used to detect and assess them in accordance with the relevant national, European, or international frameworks for each matter. Information on any impacts identified should be included, providing a breakdown of these impacts , particularly the main short-, medium-, and long-term risks.	GRI 207-2 Fiscal governance, control and risk management	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.
Information on environmental issues	**Environmental management**	Current and foreseeable effects of the company's activities on the environment and, where applicable, on health and safety	GRI 2-23 Strategies, policies and practices	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR 1 (b)
		Environmental assessment or certification procedures	GRI 2-23 Strategies, policies and practices	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR 1 (b)
		Resources dedicated to the prevention of environmental risks	GRI 2-23 Strategies, policies and practices	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR 1 (b)
		Application of the precautionary principle	GRI 2-23 Strategies, policies and practices	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR 1 (b)

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		Provisions and guarantees for environmental risks	GRI 2-27 Compliance with laws and regulations	ESRS 2 SMB-3 §48(d); ESRS E2 E2-4 §AR 25 (b); ESRS S1 S1-17 §103 (c) to (d) and §104 (b); ESRS G1 G1-4 §24(a)
Information on environmental issues	**Pollution**	Measures to prevent, reduce or repair carbon emissions that seriously affect the environment, taking into account any form of air pollution specific to an activity, including noise and light pollution.	GRI 305-5 Reduction of GHG emissions	ESRS E1 E1-3 §29(b); E1-4 §34(c); §AR 25 (b) and (c); E1-7 §56
	Circular Economy and waste prevention and management	Prevention measures, recycling, reuse, other forms of recovery and waste disposal. Actions to combat food waste.	GRI 301-1 Materials used by weight or volume	ESRS E5 E5-4 §31 (a)
			GRI 301-2 Recycled inputs used	ESRS E5 E5-4 §31 (c)
			GRI 301-3 Recovered packaging products and materials	Resource outflows related to products and services' and 'Waste' are sustainability matters for E5 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.
			GRI 306-2 Waste by type and disposal method	ESRS E5 E5-2 §17 and §20 (e) and (f); E5-5 §40 and §AR 33 (c)
			GRI 306-4 Transport of hazardous waste	ESRS E5 E5-5 §37 (b), §38 and §40
Information on environmental issues	**Sustainable use of resources**	Water consumption and water supply in accordance with local limitations	GRI 303-1 Interaction with water as a shared resource	ESRS 2 SBM-3 §48(a); MDR-T §80(f); ESRS E3 §8(a); §AR 15(a); E3-2 §15, §AR 20
			GRI 303-2 Management of impacts related to water discharge	ESRS E2 E2-3 §24
			GRI 303-3 Water Extraction	Water withdrawals' is a sustainability matter for E3 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.
			GRI 303-5 Water consumption	ESRS E3 E3-4 §28 (a), (b), (d) and (e)
			GRI 303-4 Water Discharge	Water discharges' is a sustainability matter for E3 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed

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		Consumption of raw materials and the measures taken to improve the efficiency of their use	GRI 3-3 Management of material aspects (with a view to GRI 300)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)
			GRI 301-1 Materials used by weight or volume	
		Energy: Direct and indirect consumption; Measures taken to improve energy efficiency; Use of renewable energy	GRI 3-3 Management of material aspects (with a view to GRI 302 Energy)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)
			GRI 302-1 Energy consumption within the organization (energy from renewable and non-renewable sources)	ESRS E1 E1-5 §37; §38; §AR 32 (a), (c), (e) and (f)
			GRI 302-2 Energy consumption outside the organization	'Energy' is a sustainability matter for E1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.
			GRI 302-4 Reduction of energy consumption	'Energy' is a sustainability matter for E1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.
Information on environmental issues	**Climate Change**	Greenhouse Gas Emissions	GRI 305-1 Direct GHG emissions (scope 1)	ESRS E1 E1-4 §34(c); E1-6 §44(a); §46; §50; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 40; AR §43 (c) to (d)
			GRI 305-2 Indirect GHG emissions from power generation (scope 2)	ESRS E1 E1-4 §34(c); E1-6 §44(b); §46; §49; §50; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 40; §AR 45 (a), (c), (d), and (f)
		The measures adopted to adapt to the consequences of Climate Change	GRI 3-3 Management of material aspects (with a view to GRI 300)	ESRS E1 E1-2 §25 (c) to (d); E1-3 §26; E1-4 §33
Information on environmental issues	Climate Change	Voluntarily established medium and long-term reduction targets to reduce GHG emissions and means implemented for this purpose.	GRI 305-5 Reduction of GHG emissions	ESRS E1 E1-3 §29(b); E1-4 §34(c); §AR 25 (b) and (c); E1-7 §56

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	Biodiversity protection	Measures taken to preserve or restore biodiversity and impacts caused by actions or operations in protected areas	GRI 304-2 Significant impacts of activities, products and services on biodiversity	ESRS E4 E4-5 §35, §38, §39, §40 (a) and (c)
			GRI 304-3 Habitats protected or restored	ESRS E4 E4-3 §28 (b) and §AR 20 (e); E4-4 §AR 26 (a)
Information on social and personnel matters	**Policies**	Policies applied by the company, including the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and for verification and control, as well as the measures that have been adopted.	GRI 2-23 Commitments and Policies	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR 1 (b)
			GRI 2-24 Incorporation of commitments and policies	ESRS 2 GOV-2 §26(b); MDR-P §65(c); ESRS S1 S1-4 §AR 35; ESRS S2 S2-4 §AR 30; ESRS S3 S3-4 §AR 27; ESRS S4 S4-4 §AR 27; ESRS G1 G1-1 §9 and §10 (g)
Information on social and personnel matters	**Main risks**	The main risks related to these issues linked to the company's activities, including, where relevant and proportionate, its business relationships, products, or services that may have negative effects in these areas, and how the company manages these risks, explaining the procedures used to detect and assess them in accordance with the relevant national, European, or international frameworks for each matter. Information on any impacts identified should be included, providing a breakdown of these impacts , particularly the main short-, medium-, and long-term risks.	GRI 207-2 Fiscal governance, control and risk management	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16
Information on social and personnel matters	**Employment**	Total number and distribution of employees by gender, age, country, and professional classification	GRI 2-7 Employees	ESRS 2 SBM-1 §40 (a) iii; ESRS S1 S1-6 §50 (a) to (b) and (d) to (e), §51 to §52
			GRI 405-1 Diversity of governing bodies and employees	ESRS 2 GOV-1 §21(d); ESRS S1 S1-6 §50(a); S1-9 §66 (a) to (b); S1-12 §79
			GRI 401-1 New employee recruitment and staff turnover	ESRS S1 S1-13 §83 (b) and §84
		Total number and distribution of employment contract types	GRI 2-7 Employees	ESRS 2 SBM-1 §40 (a) iii; ESRS S1 S1-6 §50 (a) to (b) and (d) to (e), §51 to §52
Information on social and personnel matters	**Employment**	Average annual number of permanent, temporary and part-time contracts by gender, age and professional classification	GRI 2-7 Employees Total number of employees by contract (indefinite/temporary and full/part) by gender and region, average age and professional classification.	ESRS 2 SBM-1 §40 (a) iii; ESRS S1 S1-6 §50 (a) to (b) and (d) to (e), §51 to §52
		Number of layoffs by gender, age, and professional classification	GRI 401-1 New employee recruitment and staff turnover Number of layoffs by professional classification	ESRS S1 S1-6 §50 (c)

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		Average remuneration and its evolution broken down by gender, age and professional classification or equal value	GRI 405-2 Ratio between basic salary and remuneration of women and men Average remuneration by gender, age and professional classification and its evolution. For its calculation, the total salary receipts in cash and remuneration in kind must be taken into account, so the benefits referred to in GRI 401-2 must be considered for the calculation.	ESRS S1 S1-16 §97 and §98
Information on social and personnel matters	**Employment**	Wage gap	GRI 405-2 Ratio between basic salary and remuneration of women and men	ESRS S1 S1-16 §97 and §98
			GRI 202-1 Ratio of standard entry-level salary by gender to local minimum wage (this indicator is used because, as one progresses in a career, various factors can influence the definition of each person's remuneration).	ESRS S1 S1-10 §67-71 and §AR 72 to 73
			GRI 405-2 Ratio between basic salary and remuneration of women and men. *OECD: The gender pay gap is defined as the difference between the average earnings of men and women relative to the average earnings of men	ESRS S1 S1-16 §97 and §98
Information on social and personnel matters	**Employment**	The average remuneration of directors and managers, including variable remuneration, allowances, compensation, payments to long-term savings plans and any other income broken down by gender.	GRI 2-19 Compensation Policies.	ESRS 2 GOV-3 §29 (a) to (c); ESRS E1 §13
			GRI 201-3 Obligations arising from social benefit schemes and other retirement schemes. Information broken down by gender.	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.
Information on social and personnel matters	**Employment**	Implementation of work disconnection measures	GRI 3-3 Management of material aspects (with a view to GRI 300)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)
Information on social and personnel matters	**Employment**	Employees with disabilities	GRI 405-1 Diversity of governing bodies and employees	ESRS 2 GOV-1 §21(d); ESRS S1 S1-6 §50(a); S1-9 §66 (a) to (b); S1-12 §79
	Work organization	Organization of working time	GRI 3-3 Management of material aspects (with a view to GRI 300)	ESRS E1 E1-2 §25 (c) to (d); E1-3 §26; E1-4 §33

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		Number of hours of absenteeism	Internal work schedule record	
		Measures aimed at facilitating the enjoyment of work-life balance and promoting the shared responsibility of both parents in exercising this right.	GRI 401-3 Parental Leave Management approach to other work-life balance measures	ESRS S1 S1-15 §93
Information on social and personnel matters	**Health and safety**	Health and safety conditions at work	GRI 403-1 Occupational Health and Safety Management System	ESRS S1 S1-1 §23
			GRI 403-2 Hazard identification, risk assessment and incident investigation	ESRS S1 S1-3 §32 (b) and §33
			GRI 403-3 Occupational health services	'Health and safety' and 'Training and skills development' are sustainability matters for S1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.
			GRI 403-4 Occupational health and safety issues addressed in formal agreements with the legal representatives of the workers	
			GRI 403-5 Training of workers on health and safety at work	
			GRI 403-6 Promoting the health of workers	'Social protection' is a sustainability matter for S1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.
			GRI 403-7 Prevention and mitigation of the impacts on the health and safety of workers directly linked to commercial relationships	ESRS S2 S2-4 §32 (a)
			GRI 403-8 Coverage of the occupational health and safety management system	ESRS S1 S1-14 §88 (a); §90
		Work accidents (frequency and severity) broken down by gender	GRI 403-9 Workplace Accident Injuries	ESRS S1 S1-4, §38(a); S1-14 §88 (b) and (c); §AR 82
		Occupational diseases (frequency and severity) disaggregated by gender	GRI 403-10 Occupational illnesses and diseases	ESRS S1 S1-4, §38(a); S1-14 §88 (b) and (d); §89; §AR 82
Information on social issues and relating to personnel	**Social relationships**	Organization of social dialogue, including procedures for informing and consulting staff and negotiating with them	GRI 2-29 Stakeholder Engagement Approach (relating to trade unions and collective bargaining)	ESRS 2 SMB-2 §45 (a) i to (a) iv; ESRS S1 S1-1 §20(b); S1-2 §25, §27 (e) and §28; ESRS S2 S2-1 §17(b); S2-2 §20, §22 (e) and §23; ESRS S3 S3-1 §16(b); S3-2 §19, §21 (d) and §22; ESRS S4 S4-1 §16(b); S4-2 §18, §20 (d) and §21
			GRI 2-16 Communicating critical concerns	ESRS 2 GOV-2 §26(a); ESRS G1 G1-1 AR 1 (a); G1-3 §18(c)

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			GRI 2-26 Mechanisms for seeking advice and raising concerns	ESRS S1 S1-3 §AR 32 (d); ESRS S2 S2-3 §AR 27 (d); ESRS S3 S3-3 §AR 24 (d); ESRS S4 S4-3 §AR 24 (d); ESRS G1 G1-1 §10(a); G1-3 §18(a)
		Percentage of employees covered by collective agreement by country	GRI 2-30 Collective bargaining agreements Percentage broken down by country	ESRS S1 S1-8 §60 (a) and §61
		Assessment of collective agreements, particularly in the field of occupational health and safety	GRI 403-4 Occupational health and safety issues addressed in formal agreements with the legal representatives of the workers	'Health and safety' and 'Training and skills development' are sustainability matters for S1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.
			GRI 2-30 Collective bargaining agreements	ESRS S1 S1-8 §60 (a) and §61
		Mechanisms and procedures that the company has in place to promote employee involvement in the management of the company, in terms of information, consultation and participation	GRI 2-29 Stakeholder Engagement Approach	ESRS 2 SMB-2 §45 (a) i to (a) iv; ESRS S1 S1-1 §20(b); S1-2 §25, §27 (e) and §28; ESRS S2 S2-1 §17(b); S2-2 §20, §22 (e) and §23; ESRS S3 S3-1 §16(b); S3-2 §19, §21 (d) and §22; ESRS S4 S4-1 §16(b); S4-2 §18, §20 (d) and §21
Information on social and personnel matters	**Training**	Policies implemented in the field of training	GRI 404-2 Programs to improve employee skills and programs	ESRS S1 S1-1 §AR 17 (h) People first (pp. 90-92)
		Total number of training hours by professional category	Total training hours.	
	Accessibility	Universal accessibility for people with disabilities	GRI 3-3 Management of material aspects (with a view to GRI 405 Diversity and equal opportunities and GRI 406 Non-discrimination)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c) People First (pp. 86-88)

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Information on social and personnel matters	**Equality**	Measures adopted to promote equal treatment and opportunities between men and women	GRI 3-3 Management of material aspects (with a view to GRI 405 Diversity and equal opportunities)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)
			GRI 405-1 Diversity of governing bodies and employees	ESRS 2 GOV -1 §21(d); ESRS S1 S1-6 §50(a); S1-9 §66 (a) to (b); S1-12 §79
Information on social and personnel matters	**Equality**	Equality plans. Measures adopted to promote employment, protocols against sexual harassment and harassment based on sex	GRI 3-3 Management of material aspects (with a view to GRI 405 Diversity and equal opportunities and GRI 406 Non-discrimination)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)
		The integration and universal accessibility of people with disabilities	GRI 3-3 Management of material aspects (with a view to GRI 405 Diversity and equal opportunities and GRI 406 Non-discrimination)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)
Information on social and personnel matters	**Equality**	Policy against all types of discrimination and, where applicable, diversity management	GRI 3-3 Management of material aspects (with a view to GRI 405 Diversity and equal opportunities and GRI 406 Non-discrimination)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)
			GRI 406-1 Cases of discrimination and corrective actions taken	ESRS S1 S1-17 §97, §103(a), §AR 103
Information on respect for human rights	**Policy and risks**	Policies applied by the company and main risks, including among other aspects the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and for verification and control, as well as the measures that have been adopted		

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Contents of the Law 11/2018 INF			**Standard used**	**Chapter of reference**
Information on respect for human rights	**Rights Humans**	Application of human rights due diligence procedures	GRI 3-3 Management of material aspects (with a view to GRI 412 human rights assessment)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c) Human Rights (p. 77 to 81)
			GRI 2-23 Strategies, policies and practices	
		Prevention of risks of human rights violations and, where appropriate, measures to mitigate, manage and remedy possible abuses committed	GRI 2-27 Compliance with laws and regulations	ESRS 2 SMB-3 §48(d); ESRS E2 E2-4 §AR 25 (b); ESRS S1 S1-17 §103 (c) to (d) and §104 (b); ESRS G1 G1-4 §24(a)
			GRI 2-25 Processes for remedying negative impacts	ESRS S1 S1-1 §20(c); S1-3 §32 (a), (b) and (e), §AR 31; ESRS S2 S2-1 §17(c); S2-3 §27 (a), (b) and (e), §AR 26; S2-4 §33(c); ESRS S3 S3-1 §16(c); S3-3 §27 (a), (b) and (e), §AR 23; S3-4 §33(c); ESRS S4 S4-1 §16(c); S4-3 §25 (a), (b) and (e), §AR 23; S4-4 §32(c)
		Complaints regarding cases of human rights violations	GRI 2-27 Compliance with laws and regulations	ESRS 2 SMB-3 §48(d); ESRS E2 E2-4 §AR 25 (b); ESRS S1 S1-17 §103 (c) to (d) and §104 (b); ESRS G1 G1-4 §24(a)
			GRI 2-25 Processes for remedying negative impacts	ESRS S1 S1-1 §20(c); S1-3 §32 (a), (b) and (e), §AR 31; ESRS S2 S2-1 §17(c); S2-3 §27 (a), (b) and (e), §AR 26; S2-4 §33(c); ESRS S3 S3-1 §16(c); S3-3 §27 (a), (b) and (e), §AR 23; S3-4 §33(c); ESRS S4 S4-1 §16(c); S4-3 §25 (a), (b) and (e), §AR 23; S4-4 §32(c)
			GRI 406-1 Cases of discrimination and corrective actions taken	ESRS S1 S1-17 §97, §103(a), §AR 103
		Promotion and compliance with the provisions of the ILO's fundamental conventions relating to respect for freedom of association and the right to collective bargaining, the elimination of discrimination in employment and occupation, the elimination of forced or compulsory labor and the effective abolition of child labor	GRI 2-27 Compliance with laws and regulations	ESRS 2 SMB-3 §48(d); ESRS E2 E2-4 §AR 25 (b); ESRS S1 S1-17 §103 (c) to (d) and §104 (b); ESRS G1 G1-4 §24(a)
			GRI 2-23 Strategies, policies and practices	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR 1 (b)
Information relating to the fight against corruption and	**Policies**	Policies applied by the company, including the due diligence procedures applied for the identification, assessment, prevention and mitigation of	GRI 2-23 Commitments and Policies	

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Contents of the Law 11/2018 INF			**Standard used**	**Chapter of reference**
bribery		significant risks and impacts, and for verification and control, as well as the measures that have been adopted	GRI 2-24 Incorporation of commitments and policies	ESRS 2 GOV-2 §26(b); MDR-P §65(c); ESRS S1 S1-4 §AR 35; ESRS S2 S2-4 §AR 30; ESRS S3 S3-4 §AR 27; ESRS S4 S4-4 §AR 27; ESRS G1 G1-1 §9 and §10 (g)
Information relating to the fight against corruption and bribery	**Main risks**	The main risks related to these issues linked to the company's activities, including, where relevant and proportionate, its business relationships, products, or services that may have negative effects in these areas, and how the company manages these risks, explaining the procedures used to detect and assess them in accordance with the relevant national, European, or international frameworks for each matter. Information on any impacts identified should be included, providing a breakdown of these impacts , particularly the main short-, medium-, and long-term risks.	GRI 207-2 Fiscal governance, control and risk management	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.
Information relating to the fight against corruption and bribery	Corruption and bribery	Measures taken to prevent corruption and bribery	GRI 3-3 Management of material aspects (with a view to GRI 205 Anti-corruption)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33(a); S4-5 §41 (b) to (c) Ethics and integrity (p. 23 to 30)
			GRI 205-2 Communication and training on anti-corruption policies and procedures	ESRS G1 G1-3 §20, §21 (b) and (c) and §AR 7 and 8
			GRI 205-3 Confirmed corruption incidents and measures taken	ESRS G1 G1-4 §25
			GRI 2-27 Compliance with laws and regulations	ESRS 2 SMB-3 §48(d); ESRS E2 E2-4 §AR 25 (b); ESRS S1 S1-17 §103 (c) to (d) and §104 (b); ESRS G1 G1-4 §24(a)
			GRI 2-23 Strategies, policies and practices	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR 1 (b)
		Measures to combat money laundering	GRI 3-3 Management of material aspects (with a view to GRI 205 Anti-corruption)	ESRS G1 G1-2 §12
			GRI 2-27 Compliance with laws and regulations	ESRS 2 SMB-3 §48(d); ESRS E2 E2-4 §AR 25 (b); ESRS S1 S1-17 §103 (c) to (d) and §104 (b); ESRS G1 G1-4 §24(a)

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Contents of the Law 11/2018 INF			Standard used	Chapter of reference
			GRI 2-23 Strategies, policies and practices	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR 1 (b)
	Corruption and bribery	Contributions to foundations and non-profit organizations	GRI 201-1 Direct economic value generated and distributed	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.
Information about society	**Policies**	Policies applied by the company, including the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and for verification and control, as well as the measures that have been adopted.	GRI 3-3 Management of material aspects	ESRS G1 G1-2 §12
			GRI 2-23 Commitments and Policies	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1 G1-1 §7 and §AR 1 (b)
			GRI 2-24 Incorporation of commitments and policies	ESRS 2 GOV-2 §26(b); MDR-P §65(c); ESRS S1 S1-4 §AR 35; ESRS S2 S2-4 §AR 30; ESRS S3 S3-4 §AR 27; ESRS S4 S4-4 §AR 27; ESRS G1 G1-1 §9 and §10 (g)
Information about society	**Main risks**	The main risks related to these issues linked to the company's activities, including, where relevant and proportionate, its business relationships, products, or services that may have negative effects in these areas, and how the company manages these risks, explaining the procedures used to detect and assess them in accordance with the relevant national, European, or international frameworks for each matter. Information on any impacts identified should be included, providing a breakdown of these impacts , particularly the main short-, medium-, and long-term risks.	GRI 3-3 Management of material aspects	ESRS G1 G1-2 §12
			GRI 207-2 Fiscal governance, control and risk management	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.
Information about society	**Company commitments to sustainable development**	Impact of the company's activity on employment and local development	GRI 2-6 Activities, value chain and other business relationships	ESRS 2 SBM-1 §40 (a) i to (a) ii, (b) to (c), §42 (c)
			GRI 2-29 Approach to stakeholder engagement	ESRS 2 SMB-2 §45 (a) i to (a) iv; ESRS S1 S1-1 §20(b); S1-2 §25, §27 (e) and §28; ESRS S2 S2-1 §17(b); S2-2 §20, §22 (e) and §23; ESRS S3 S3-1 §16(b); S3-2 §19, §21 (d) and §22; ESRS S4 S4-1 §16(b); S4-2 §18, §20 (d) and §21
			GRI 204-1 Proportion of spending on local suppliers	'Communities' economic, social and cultural rights' is a sustainability matter for S3 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.

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Contents of the Law 11/2018 INF			Standard used	Chapter of reference
		Impact of the company's activity on local populations and the territory	GRI 413-1 Operations with local community participation, impact assessments and development programs	ESRS S3 S3-2 §19; S3-3 §25; S3-4 §AR 34(c)
			GRI 2-6 Activities, value chain and other business relationships	ESRS 2 SBM-1 §40 (a) i to (a) ii, (b) to (c), §42 (c)
			GRI 2-29 Approach to stakeholder engagement	ESRS 2 SMB-2 §45 (a) i to (a) iv; ESRS S1 S1-1 §20(b); S1-2 §25, §27 (e) and §28; ESRS S2 S2-1 §17(b); S2-2 §20, §22 (e) and §23; ESRS S3 S3-1 §16(b); S3-2 §19, §21 (d) and §22; ESRS S4 S4-1 §16(b); S4-2 §18, §20 (d) and §21
Information about society	**Company commitments to sustainable development**	Relationships maintained with actors in local communities and the methods of dialogue with them	GRI 2-29 Stakeholder Engagement Approach (Related to Community)	
		Partnership and sponsorship actions	GRI 2-28 Member Associations	'Political engagement' is a sustainability matter for G1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.
	Subcontracting and suppliers	Inclusion of social, gender equality and environmental issues in purchasing policy	GRI 2-6 Activities, value chain and other business relationships	ESRS 2 SBM-1 §40 (a) i to (a) ii, (b) to (c), §42 (c)
			GRI 2-24 Incorporation of commitments and policies	ESRS 2 GOV-2 §26(b); MDR-P §65(c); ESRS S1 S1-4 §AR 35; ESRS S2 S2-4 §AR 30; ESRS S3 S3-4 §AR 27; ESRS S4 S4-4 §AR 27; ESRS G1 G1-1 §9 and §10 (g)
			GRI 3-3 Management of material aspects (with a view to GRI 308 and GRI 414)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)
			GRI 204-1 Proportion of spending on local suppliers	'Communities' economic, social and cultural rights' is a sustainability matter for S3 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.

Contents of the State of Information No Financial				
Contents of the Law 11/2018 INF			Standard used	Chapter of reference
		Consideration of social and environmental responsibility in relationships with suppliers and subcontractors	GRI 3-3 Management of material aspects (with a view to GRI 308 and GRI 414)	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)
			GRI 2-6 Activities, value chain and other business relationships	ESRS 2 SBM-1 §40 (a) i to (a) ii, (b) to (c), §42 (c)
		Monitoring and auditing systems and their results	GRI 3-3 Management of material issues	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)
			GRI 2-6 Activities, value chain and other business relationships	ESRS 2 SBM-1 §40 (a) i to (a) ii, (b) to (c), §42 (c)
			GRI 2-24 Incorporation of commitments and policies	ESRS 2 GOV-2 §26(b); MDR-P §65(c); ESRS S1 S1-4 §AR 35; ESRS S2 S2-4 §AR 30; ESRS S3 S3-4 §AR 27; ESRS S4 S4-4 §AR 27; ESRS G1 G1-1 §9 and §10 (g)
Information about society	Consumers	Measures for the health and safety of consumers	GRI 2-16 Communicating critical concerns	ESRS 2 GOV-2 §26(a); ESRS G1 G1-1 AR 1 (a); G1-3 §18(c)
			GRI 3-3 Management of material issues	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv ; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)
			GRI 416-2 Non-compliance cases relating to the health and safety impacts of product and service categories	ESRS S4 S4-4 §35
		Complaint systems, complaints received and their resolution	GRI 2-25 Processes for remedying negative impacts	ESRS S1 S1-1 §20(c); S1-3 §32 (a), (b) and (e), §AR 31; ESRS S2 S2-1 §17(c); S2-3 §27 (a), (b) and (e), §AR 26; S2-4 §33(c); ESRS S3 S3-1 §16(c); S3-3 §27 (a), (b) and (e), §AR 23; S3-4 §33(c); ESRS S4 S4-1 §16(c); S4-3 §25 (a), (b) and (e), §AR 23; S4-4 §32(c)
	Tax information	Benefits obtained by country	GRI 207-4 Country-by-Country Reporting	This topic is not covered by the list of sustainability matters in ESRS 1 AR §16.

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Contents of the Law 11/2018 INF			Standard used	Chapter of reference
		Taxes on profits paid	GRI 207-4 Country-by-Country Reporting	
		Public subsidies received	GRI 201-4 Financial assistance received from the government	

Y para que así conste, se suscribe el presente Estado de Información No Financiera de Soltec Power Holdings, S.A., en representación de la Sociedad.

En Madrid a 23 de marzo de 2026

Fdo.: Mariano Berges del Estal
Consejero Delegado (CEO)
Soltec Power Holging, S.A.