



Sustainability Policy

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Purpose



Purpose



commitment

values

compliance

knowledge

decarbonization

The Sustainability Policy (hereinafter, the “Policy”) **seeks to establish the guiding principles and commitments in terms of Sustainability that must underpin the strategy adopted by Nexus Energía, S.A.** (hereinafter, Nexus, Nexus Group, Group or the Organization), the management of business and corporate activities, all other existing internal policies and regulations, and relations with our stakeholders, the goal being to create value sustainably.

This policy reaffirms the purpose of Nexus Energía, which is to accompany and empower people, companies and cities along the energy transition path, thereby promoting a change in their relationship with energy towards a more responsible and efficient use thereof that contributes to the decarbonization of society, while also promoting a commitment to the values established in our Code of Ethics and Conduct.

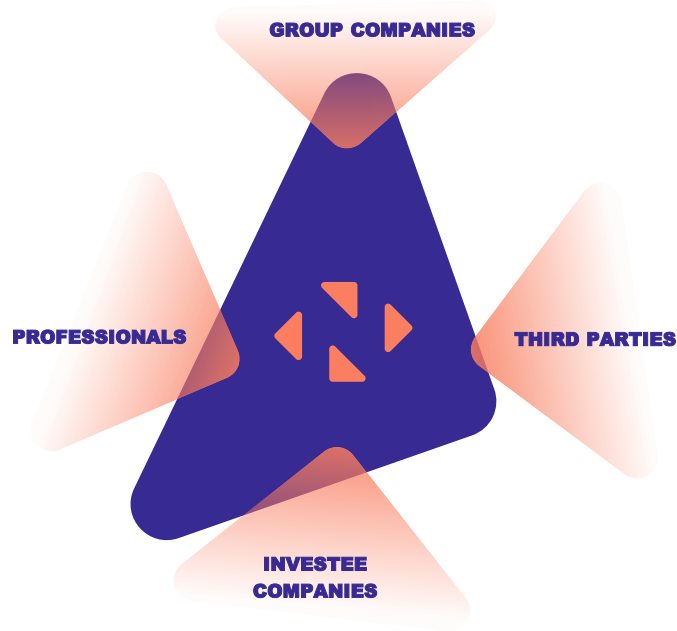
The guiding principles and commitments reflected in this Policy may be developed and further detailed in other internal regulations for the purpose of drawing up directives and guidelines on the management of businesses and activities with regard to the environment, society and corporate governance and compliance.



Scope of application



→ Scope of application



This Policy applies **to all companies that make up the Nexus Group and over which effective control or responsibility for management and operation is exercised.**

Furthermore, this Policy will also **apply to all those investees not forming part of the Group over which control is not exercised, the companies and partners that act in the name or on behalf of Nexus, business partners¹ and suppliers.**

At Nexus, we will encourage our professionals² and business partners to adopt practices and conduct guidelines that respect the principles of this Policy and those of the Code of Ethics and Conduct.

The Group may adopt measures aimed at maintaining business relationships only with counterparties that engage in their activity while respecting this Policy.

1. Any counterparty with which Nexus has or intends to engage in any kind of business relationship.

2. "Professionals" means all the group required to comply with the values, principles and conduct guidelines contained in the Code of Ethics and Conduct: Nexus employees, regardless of their level within the organization, and all members of the Board of Directors, the Audit and Sustainability Committee, the Executive Committee and of any other committee created within the Board, both of Nexus Energía, S.A. and of any other investee company over which Nexus has effective control or for which it has management and operational responsibility.



Guiding Principles





Guiding Principles

At Nexus, we have defined the Guiding Principles that must steer the Nexus Sustainability Strategy. These principles are inspired by the Group's purpose and values. **They will be further developed and specified in the future Sustainability Roadmap.**



Firm commitment to the energy transition and efforts to build a more sustainable world, ensuring responsible environmental, social and economic management.



Creation of shared value for all stakeholders of the Group and in response to their expectations, linking business success and return for shareholders and financiers to the contribution to a more decarbonized world, empowering represented parties, employees, customers, partners, suppliers, agents and communities to generate mutual benefits and strengthen their positive impact on the environment and society.



Customer focus, offering the best possible service and response, and providing products and services that streamline their costs while reducing environmental impact, ensuring that everyone wins by being more sustainable.



Ongoing and inclusive innovation, with a service mentality. Always abiding by regulatory requirements and cutting-edge technological advancements to improve our portfolio of products and services, our processes and activities, so that we can use them to serve our stakeholders and support the energy transition and decarbonization.



Guiding Principles



Excellence in all aspects of management at Nexus, including transparency and responsible, honest and grounded communication with our stakeholders; the quality of our products and services; care for our customers and our represented parties; responsible management of the value and supply chain; and the recruitment, training and care of the best talent.



Responsibility vis-a-vis the human team, fostering equality, diversity and inclusion, professional development, safety, wellbeing and health, as well as fair working conditions. Respect for human rights and the fundamental rights of employees will be encouraged throughout the supply chain.



Ethical conduct and professional responsibility for safely doing business in a highly regulated market under guidance from our ethical principles, guaranteeing the protection of value for shareholders and maximum respect of our customers and other stakeholders.



Commitments



Commitments

At Nexus, we are committed to the following in terms of sustainability:



collaboration

act

rise awareness

responsibility

define

achieve

Cross-cutting collaboration aimed at redefining and maintaining a Sustainability Strategy, and defining a Corporate Sustainability Roadmap with specific targets and responsibilities while considering materiality and the possible specific characteristics of the various geographic regions in which Nexus operates.

The necessary updates to the Organization's Governance and Compliance System, specifically those to the governing and management bodies, to enable compliance with individual and collective responsibilities aimed at achieving the Sustainability objectives and commitments.

The definition of policies and regulations, and the implementation of a compliance oversight system capable of ensuring correct progress on and the achievement of the Sustainability Strategy, the objectives and the future Sustainability Roadmap.

To raise awareness, train and involve employees of the Organization in the Sustainability Strategy, Objectives and Roadmap, and to also involve business partners, suppliers and other stakeholders.

Preparation of Double Materiality and its review over time in order to identify impacts on the value chain, either positive or negative, actual or potential, and to maintain the financial and non-financial risk and opportunity management systems. The principles of extended responsibility and due diligence must be followed while doing so in order to be ready to respond to any eventuality as far as possible.



Commitments



transparency

inform

boost

ease

worth

Transparency in terms of sustainability, through reporting and any other channels deemed appropriate, on all those material topics and always based on active listening to stakeholders and applying the principle of responsible, honest and grounded communication and marketing, with and for all our stakeholders.

To establish information systems that enable complete data on ESG to be obtained and that enable the progress on and achievement of objectives to be assessed and reported.

The inclusion in procurement processes and the official approval of partners and suppliers (supply chain) of factors that enable to assess their commitment to sustainability and to prioritize partnerships with those that respect and collaborate on achieving objectives and the Sustainability Roadmap.

To foster and prioritize green financing at the Group for funding projects and investments that seek sustainability objectives.

Updates to the carbon footprint calculation so as to consider the entire value chain, based on the principle of materiality.



Responsibilities



Responsibilities

Governing Bodies

The Nexus **Board of Directors** is ultimately responsible for the Governance and Compliance System and, via the **Audit and Sustainability Committee**, must promote, incentivise and ensure that the necessary measures are adopted for the correct design, development and implementation of this Policy.

In particular, responsibilities are included in the Regulations governing the various governing bodies and are listed below:

Board of Directors

- ▶ Definition of the sustainability strategy and objectives.
- ▶ Approval of business policies and plans, as well as the organization and resources needed to achieve them.
- ▶ To approve the Sustainability Roadmap and engage in oversight via the Audit and Sustainability Committee.
- ▶ To approve the Double Materiality analysis.
- ▶ Preparation of the Sustainability Report alongside the Annual Accounts.

Audit and Sustainability Committee






- ▶ To exercise internal control via oversight and supervision of strategy implementation, analysis of Double Materiality and the management of Environmental, Social and Governance (hereinafter, ESG) risks.
- ▶ To supervise compliance with the objectives based on clear indicators and metrics, with regulations and with management guidelines on Sustainability.
- ▶ Review of the Sustainability Reports for the timely preparation by the Board of Directors and their final approval by the Shareholders' Meeting.

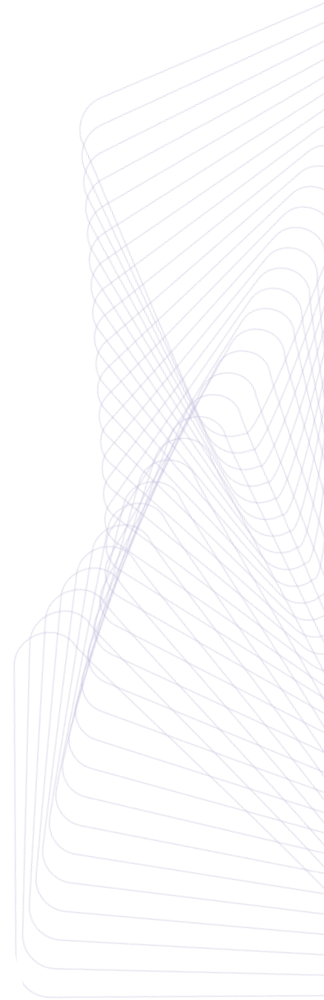


Responsibilities **Management Bodies**

The **General Management Department of the Nexus Group** will be responsible for rolling out the future Sustainability Roadmap at a strategic and tactical level, for ensuring its achievement through objectives and specific metrics, and for reporting its progress to the Board of Directors.

Reporting to the Audit and Sustainability Committee, the (Corporate) Sustainability Department will have the following responsibilities:

-  **To foster, propose, coordinate and supervise development of the sustainability strategy, the objectives and the Sustainability Roadmap.**
-  **To establish information and training plans for progress towards a sustainable corporate culture (internal and external stakeholders).**
-  **To define and assess compliance with policies and procedures that respond to the Impacts, Risks and Opportunities (IROs) identified in the Double Materiality analysis and in ESG risk management.**
-  **To coordinate the reporting team and the information to be reported on Sustainability.**
-  **To establish key ESG topics for inclusion in the communication plan**





Responsibilities

Management Bodies

Reporting to the General Management Department and the Sustainability Department, the **(Corporate) Sustainability Committee** will have the following roles:

1

Sustainability Strategy and its oversight

- ▶ To propose changes and updates to the Strategy, to establish corporate objectives capable of contributing to compliance with the strategy, and to propose the Sustainability Roadmap.
- ▶ To develop specific policies aimed at achieving those objectives.
- ▶ To establish metrics that enable assessment of progress.
- ▶ To understand and review the impact from material sustainability issues on stakeholders and on the financial evolution and results of the Group.
- ▶ To engage in continuous oversight of progress and to assess the impact that those policies have on the environment and society.

2

Risk Management and internal control

- ▶ To identify the impacts, risks and opportunities (IROs) related to sustainability and their management.
- ▶ To integrate the identified sustainability risks into the Corporate Risk Map.
- ▶ To implement the necessary control measures for suitable management of said risks.
- ▶ To provide training in specialized areas for the identification and management of sustainability risks



Responsibilities **Management Bodies**

3 Compliance

- ▶ To define policies and develop rules for compliance with regulations, incorporating existing best practice.
- ▶ To assess compliance with regulations and relevant standards.

4 Integration and promotion of Sustainability

- ▶ To promote a business culture that prioritizes and integrates sustainability into management and decision-making.
- ▶ To implement improvements in operating procedures aimed at reducing environmental and social impact.

5 Stakeholder relations

- ▶ To engage with various stakeholders in order to understand their concerns and expectations vis-à-vis sustainability.
- ▶ To extend the commitment to the value chain and to foster the development of sustainable partnership methods with suppliers and business partners.
- ▶ To work with other organizations and entities on promoting sustainable practices.

6 Reporting, communication and outreach

- ▶ To approve the communication strategy in terms of sustainability.
- ▶ To regularly report on progress and achievements in terms of sustainability objectively, in an understandable fashion and so as to respond to the interest of stakeholders and in accordance with the principle of double materiality.
- ▶ Preparation and reporting of the Sustainability Report, and to submit the information in this regard for verification and auditing.
- ▶ Decision and supervision of inclusion in ESG indices or ratings.
- ▶ To foster training and awareness on sustainable practices among employees and partners.



Responsibilities **Management Bodies**

Furthermore, a number of **Working Groups** will report to the Sustainability Committee and will have a responsibility to engage in the actions and projects approved in the Roadmap for development of the Sustainability Strategy.

The Management Department and executives of the Nexus Group will act under the strongest commitment to the Policy and will be benchmarks within the Organization regarding its responsible and sustainable management and ethical conduct and compliance, demonstrating their unequivocal support for the implementation of this Policy. Furthermore, they will ensure knowledge of and compliance with the Policy by all employees of the Organization.





Responsibilities

Professionals in the Organization

SOMOS
BUENA
ENERGÍA



Environmental, social and governance sustainability must form an integral part of management at the Nexus Group given that it is the best way to create shared value, grow sustainably and be ready for present and future challenges.

For that reason, although the aforementioned governing and management bodies are ultimately responsible, everyone throughout the Group is responsible for compliance with this Policy, since it applies to all professionals.



nexus
energía