



# **ENVIRONMENTAL, ENERGY MANAGEMENT AND CLIMATE ACTION POLICY**

***CODE: GGR-MS-POL-0001***

***VERSION: A1***

***DATE: 27/05/2026***

SUMMARY:

|                                   |                                                                                                               |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------|
| TITLE                             | Environmental, Energy Management and Climate Action Policy                                                    |
| SUBJECTIVE SCOPE OF APPLICATION   | Gransolar Group (as defined below)                                                                            |
| GEOGRAPHICAL SCOPE OF APPLICATION | Global                                                                                                        |
| DISCIPLINE                        | Health, Safety and Environment, Quality and Sustainability                                                    |
| CATEGORY                          | Policy                                                                                                        |
| PREPARED BY                       | HSEQ Department                                                                                               |
| RESPONSIBLE DEPARTMENT            | HSEQ Department                                                                                               |
| APPROVAL DATE                     | 27/05/2026                                                                                                    |
| APPROVING BODY                    | Board of Directors (as defined below)                                                                         |
| REPLACED VERSION                  | Environmental and Energy Management Policy (GGR-HS-POL-0001_A2)<br>Climate Action Policy (GGR-SU-POL-0001_A2) |
| CURRENT VERSION                   | A1                                                                                                            |
| USE                               | Public                                                                                                        |

VERSION HISTORY:

| VERSION | DATE       | PREPARED BY     | CHANGES MADE                        | REVIEWED BY           |
|---------|------------|-----------------|-------------------------------------|-----------------------|
| A1      | 27/05/2026 | HSEQ Department | Creation through policy unification | Governance Department |

APPROVAL HISTORY:

| VERSION | DATE       | APPROVED BY        |
|---------|------------|--------------------|
| A1      | 27/05/2026 | Board of Directors |

TABLE OF CONTENTS

1. INTRODUCTION .....1

2. OBJECT AND PURPOSE .....1

3. SCOPE OF APPLICATION .....1

4. PRINCIPLES OF ACTION .....1

5. COMMUNICATION .....2

6. REVIEW AND UPDATE.....2

7. APPROVAL.....2

8. ADDITIONAL PROVISIONS .....2

## 1. INTRODUCTION

This environmental, energy management and climate action policy (hereinafter, the “**Policy**”) is approved under the framework of the *Health, Safety, Environment, Quality, and Sustainability Corporate Macro Policy* (hereinafter, the “**Macro Policy**”) of “**Gransolar Group**” - a group of companies within the meaning provided for in Article 42 of the Spanish Commercial Code, whose parent company is GRUPO GRANSOLAR, S.L., and of which, among other companies, PV HARDWARE SOLUTIONS, S.L.U., GRANSOLAR OYM, S.L.U., GRANSOLAR CONSTRUCCIÓN DE PROYECTOS, S.L.U., ISE ENERGIA, S.L.U., as well as their respective subsidiaries, form part - and shall be governed by the general principles set forth in the Macro Policy.

This Policy is established in line with Gransolar Group’s strategy and has the commitment of its senior management to its implementation and continuous improvement.

## 2. OBJECT AND PURPOSE

To establish the principles that must guide the actions of Gransolar Group in matters of environment, energy management and climate action, with the aim of establishing Gransolar Group's framework of reference for the protection of the environment (including the prevention of pollution), the efficient management of energy, and climate action, and ensuring compliance with applicable legislation and other relevant commitments.

## 3. SCOPE OF APPLICATION

This Policy applies to all companies comprising Gransolar Group, as well as to all their employees, executives, and any person acting on their behalf or representation.

## 4. PRINCIPLES OF ACTION

In addition to the general principles established in the Macro Policy, in the development of its activities regarding environment, energy management and climate action, Gransolar Group shall act in accordance with the following principles:

- (i) Governance, compliance, and performance: Gransolar Group is committed to complying with applicable legal requirements and other requirements to which the organization subscribes regarding Gransolar Group’s environmental and energy aspects, ensuring their periodic evaluation and a commitment to the continuous improvement of energy and environmental performance and the management system. Gransolar Group ensures the availability of the information and resources necessary to achieve its measurable environmental and energy objectives and targets, using verifiable environmental indicators (EnPI) and parameters as a framework for their establishment, monitoring, and review.
- (ii) Climate action and decarbonization: Gransolar Group integrates the fight against climate change into its operations by transparently measuring and reporting greenhouse gas emissions in accordance with international standards. In addition, Gransolar Group drives the decarbonization of its operations by promoting the use of renewable energy and alternative sources, as well as fostering adaptation to climate risks and the resilience of its business.
- (iii) Environmental protection and the circular economy: Gransolar Group is committed to protecting the environment, including preventing pollution and preserving biodiversity and ecosystems, by applying a management hierarchy aimed at avoiding, minimizing, and, ultimately, offsetting the impacts resulting from its activities. Likewise, Gransolar Group adopts a life-cycle perspective to optimize the use of natural resources, promoting circular economy principles that drive efficiency, reduce waste, and minimize environmental impact.



- (iv) Energy efficiency and sustainable design: Gransolar Group conducts a preliminary assessment of the environmental and energy impacts of any technological or organizational change. Gransolar Group promotes efficient energy management throughout the entire life cycle of its projects, integrating sustainability criteria into the design and prioritizing the procurement of energy-efficient products and services that contribute to improving overall performance.
- (v) Data-driven decisions and risks and opportunities: Gransolar Group applies a preventive approach based on the identification and monitoring of environmental, energy, and climate risks and opportunities, and promotes the use of digital tools and verifiable data to ensure the traceability of information, thereby guaranteeing that decision-making and external communication are accurate and transparent.
- (vi) Commitment to the value chain and stakeholders: Gransolar Group promotes a collaborative approach involving employees, suppliers, and strategic stakeholders in the achievement of its objectives, and fosters awareness and commitment throughout its value chain to ensure responsible, safe environmental and energy performance aligned with Gransolar Group's values of excellence.

## 5. COMMUNICATION

This Policy shall be published on (i) Gransolar Group's corporate intranet, so that it is disseminated among and accessible to all its employees, and (ii) Gransolar Group's websites, so that its stakeholders can access it.

Gransolar Group will provide the necessary training, education, and awareness to ensure that this Policy is properly understood and implemented at all levels of the organization.

## 6. REVIEW AND UPDATE

This Policy shall be reviewed periodically (at least every three years) by the HSEQ Department, in coordination with the Governance Department, and may be updated sooner in the event of regulatory, organizational, or risk profile changes, or when otherwise deemed appropriate.

In any case, any amendment proposal must be reported to Gransolar Group's ESG Committee, which shall be responsible for submitting said proposal to the Board of Directors of Grupo Gransolar, S.L. (the "**Board of Directors**") for approval.

## 7. APPROVAL

This Policy has been approved by the Board of Directors, as part of its general and non-delegable power to approve the general policies and strategies of Gransolar Group.

## 8. ADDITIONAL PROVISIONS

This Policy shall be interpreted in accordance with applicable regulations and the Internal Regulatory System.



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