

SUSTAINABILITY POLICY

Date of approval	28 February 2019
Last update	28 February 2024
Updated by	Appointments and Remuneration Committee
Approved by	Board of Directors

I. INTRODUCTION

1.1. Commitment of Alantra's Board of Directors and regulatory framework

In accordance with the provisions of article 249 bis of Royal Legislative Decree 1/2010, of 2 July, approving the revised text of the Capital Companies Act (the "**Capital Companies Act**"), the Board of Directors of Alantra Partners, S.A. (the "**Company**") is responsible for determining the general policies and strategies of the Company and, in particular, the Board of Directors is responsible for approving the sustainability policy in environmental and social matters of the Alantra Group (the "**Sustainability**" and, jointly, the "**Policy**").

The Regulations of the Board of Directors, in the terms of recommendation 12 of the Good Governance of Listed Companies Code, establish that, in addition to compliance with the laws and regulations and behaviour based on good faith, ethics and respect for commonly accepted customs and good practices, the Board of Directors shall endeavour to reconcile its own interests with, as appropriate, the legitimate interests of its employees, its suppliers, its customers and other stakeholders that may be affected, as well as the impact on the company's interests, the Board of Directors shall endeavour to reconcile its own corporate interest with, as appropriate, the legitimate interests of its employees, its suppliers, its customers and other stakeholders that may be affected, as well as the impact of the Company's activities on the community as a whole and on the environment.

Assuming the principles of recommendation number 55 of the Good Governance of Listed Companies Code, the Board of Directors of the Company has decided to include in this policy the **principles or commitments** that the company assumes in its relationship with the different stakeholders and identifies at least:

- a) The objectives of sustainability policy in environmental and social matters and the development of supporting instruments.
- b) Corporate strategy related to sustainability, environment and social issues.
- c) Specific practices on issues related to: shareholders, employees, customers, suppliers, social issues, environment, diversity, fiscal responsibility, respect for human rights and prevention of illegal conduct.
- d) The methods or systems for monitoring the implementation of the specific practices referred to in the previous point, the associated risks and the management of such risks.
- e) Non-financial risk oversight mechanisms, ethics and business conduct.
- f) The channels of communication, participation and dialogue with stakeholders.
- g) Responsible communication practices that avoid manipulation of information and protect integrity and honour.

Without prejudice to the principles relating to Sustainability set out in this Policy, most of them are reflected, or are subject to development and regulation in different policies and codes of the Alantra Group.

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1.2. Sustainability in the Alantra Group's strategy

An essential element of Alantra's long-term strategy is the achievement of sustainability objectives and the integration of such objectives into Alantra's internal risk management and control processes.

Customers, markets and society as a whole not only expect companies in the financial sector to create value, but also to contribute positively to society.

Given the important role of companies in the financial sector in this transition towards a more sustainable world through their financial activity, the Alantra Group aims to play a relevant role, as demanded by society, and to help its customers and employees, as well as its shareholders, investors, suppliers and other stakeholders, in the transition towards this sustainable future.

As part of this aspiration, in addition to adhering to various international commitments such as the United Nations Principles for Responsible Investment (UNPRI), the Alantra Group promotes sustainability objectives through its advisory and asset management activities and businesses.

Therefore, this Policy aims to provide Alantra's vision and the general principles and guidelines for the treatment of sustainability in the Alantra Group (hereinafter, the "**Policy**").

II. **DEFINITION, PURPOSE AND SCOPE**

2.1. Definition and purpose

In accordance with the definition set out by the United Nations, Alantra understands "sustainable development" (or "sustainability" in general) as meeting the needs of the present generation without compromising the ability of future generations to meet their own needs. Sustainable development has emerged as the guiding principle for long-term global development, seeking to achieve, in a balanced way, economic development, social development and environmental protection.

Sustainability is oriented towards satisfying and informing stakeholders' expectations and needs, through the generation of processes that integrate their social, environmental and ethical concerns into business operations and strategy, so as to generate value not only for shareholders but also for all stakeholders and society. Sustainability is multidimensional in nature as it affects different areas of company management:

- human rights
- work placements and employment
- health protection
- environmental issues
- fight against fraud and corruption

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- interests of clients.

In this sense, for Alantra, sustainability implies, among other factors:

- Mandatory compliance with existing applicable legislation and especially with international labour and human rights standards in force.
- The assumption of objective ethical commitments that become an obligation for the Company.
- The identification, prevention and mitigation of potential adverse social, environmental and economic consequences of business activity.

Alantra faces the challenge of sustainable development as a fundamental pillar of its long-term strategy and aims to generate a positive impact through the activities of its clients, its own activity, as well as its relationship and commitments to society.

In this sense, the purpose of this Policy is to establish the principles and guidelines that will guide Alantra's corporate governance in terms of Sustainability, that is, in the management of the impacts that its activity generates on all its stakeholders, among others, its customers, employees, shareholders, local communities, environment and society in general.

2.2. Scope of application

This Policy applies both to the Company and to the different companies that make up its group ("**Alantra**" or "**Alantra Group**").

In its application, the nature, scale and complexity of the risks inherent to the business model and the activities carried out by each Alantra Group entity shall be taken into consideration in all cases, as well as respect for the local and sectorial regulations applicable in each case.

The references in this Policy to different areas, units, commissions and committees of the Group shall be understood to refer to those that perform their relevant functions at any given time, and their nomenclature may undergo changes.

III. **PRINCIPLES FOR ACTION ON SUSTAINABILITY**

Alantra, in the area of Sustainability, assumes the following principles, which operate as guidelines for its strategy in this area (the "**Sustainability Principles**"):

- Respect for legality:** Accept and respect the rule of law by complying with the applicable laws, regulations and rules in the different countries in which Alantra operates. And in particular, in this area, to develop a fiscal policy based on the principles of responsibility, prudence and transparency, in accordance with current legislation.
- Respect for **human rights** by recognising their importance and universality, the dignity of individuals and **zero tolerance of abuse or discrimination** based on any grounds, in particular race, sex, religion or social origin.

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3. Maintaining **corporate governance practices** based on ethics, business transparency, respect for the rules of the free market and free competition, rejecting any type of illegal, fraudulent or anti-competitive practice, and implementing effective mechanisms to prevent, monitor and sanction irregularities.
4. **Respect for the environment**, showing commitment to the protection and conservation of the natural environment and the fight against climate change.
5. **Promoting the energy transition**, committing to develop its activity generating positive environmental impact, advising its clients on sustainability, and focusing its investment activity on technologies and companies in the energy transition.
6. **Commitment to the promotion of investment in clean and renewable energies.**
7. **Promoting diversity and equal** opportunities in the process of attracting and training talent.
8. Maintaining high **standards of work and business ethics.**
9. **Responsible use of confidential information and personal data**, committing to implement high standards of diligence in the use of confidential and personal information through the adoption of policies, awareness-raising activities and employee training.
10. **Commitment to the economic and social development** of the communities in which it operates.
11. Contribution to meeting the **United Nations Sustainable Development Goals for 2023 in the area of** activity, and commitment in the area of asset management to the *United Nations Principles for Responsible Investment (UNPRI)*.

IV. SUSTAINABILITY IN RELATION TO DIFFERENT STAKEHOLDERS

The translation and practical application of the Sustainability Principles will be carried out through activities, projects and initiatives in relation to the different stakeholders of the Alantra Group: customers, shareholders and investors, employees, suppliers and the communities in which it operates. In the different areas of activity and for each stakeholder group, Alantra contributes to the fulfilment of the United Nations Sustainable Development Goals.

4.1. Clients

In its relationship with its clients, Alantra assumes the firm commitments to offer services and products of the highest quality and adapted to their needs, to maintain and manage conflicts of interest under the principles of loyalty and transparency, and to ensure the confidentiality of its clients' information and personal data.

In the development of its different activities through its business areas, Alantra carries out different activities with a social and environmental impact.

- a) Asset management:

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Alantra, through its asset management activity, is committed to continuing to contribute directly to economic and social development and to the energy transition within the framework of a free market economy.

By promoting various sustainable investment strategies and products, Alantra will embrace the principles of responsible investment as an approach to investing that aims to incorporate environmental, social and governance (ESG) factors into investment decisions to better manage risk and generate long-term sustainable returns.

In addition, in the provision of its investment services, in the attraction of investors for its asset management activities and in the search, selection and execution of investments for managed investment vehicles, Alantra undertakes the following commitments:

- To offer customers and investors services and products tailored to their needs with marketing policies reviewed by the relevant departments.
- Promote the highest quality of service and ensure, in asset management activities, the utmost diligence and integrity in investment processes.
- Maintain processes for managing conflicts of interest under the principles of loyalty and transparency.
- Ensure the protection of clients and investors personal data and ensure the confidentiality of non-public information made available by such clients and investors.

b) Advice:

Through Alantra's advisory activities, Alantra will seek to contribute to indirect social transformation by, on the one hand, integrating sustainability principles into financial advice and, on the other hand, promoting solutions in the field of energy transition through the provision of consultancy services such as renewable solutions, storage, renewable gases, energy efficiency, electrification, self-consumption, among others.

4.2. Shareholders and investors

In its relations with its shareholders and investors, the Company is committed to transparency and good corporate governance practices, and in this regard will assume the highest standards of transparency and alignment of incentives and, in particular:

- Will ensure equal treatment of all shareholders.
- Shall provide the market and shareholders with relevant information in a clear, complete and truthful manner.
- Shall facilitate the informed participation of shareholders in general meetings and the exercise of their other rights under applicable law.
- Shall maintain policies and mechanisms in place to manage conflicts of interest that may affect investors.

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4.3. Employees

In the field of labour relationships, Alantra will take on the following practices:

- Respect the human and labour rights recognised by the national legislation of the countries in which it operates or by the relevant international organisations.
- Provide employees with a safe and healthy working environment.
- Promote healthy lifestyles.
- Respect equal opportunities in recruitment and human resources management.
- Promote diversity and encourage non-discrimination.
- Promote the training and qualification of employees and encourage professional promotion.
- Promote job stability and work-life balance.
- Encourage internal dialogue and communication.

4.4. Society

With regard to the communities in which it operates, Alantra will assume the following principles of action:

- Assume the impact of its activities on society, by assessing and managing the non-financial risks that may arise from such activities.
- Support reasonable and viable initiatives arising from its professionals aimed at contributing to the development of society.
- Promote solidarity actions focused on the promotion of equal opportunities, social inclusion, and the eradication of hunger and poverty.

4.5. Environment

In relation to the preservation of the natural environment, the Alantra Group will apply the following principles:

- Integrate environmental aspects into the assessment of investment opportunities.
- Adopt energy saving measures and reasonable waste management.

4.6. Suppliers

Alantra will develop supplier selection practices that guarantee respect for human rights, sustainability and respect for the environment. In any case, Alantra will ensure that its suppliers are not involved in practices contrary to the rights of their employees, exploitation, mistreatment or any other form of violence, political or economic corruption, bribery or money laundering.

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Alantra is thus committed to contributing to the goal of sustainable development for peace, justice and fair institutions.

V. MONITORING AND SUPERVISION OF THE POLICY

The monitoring and control of compliance with this Policy shall be subject to the Alantra Group's non-financial risk supervision mechanisms.

In this regard, the responsables for the monitoring, supervision and control of this Policy shall be:

- The Board of Directors, as the highest body supervising the decisions of the Group's executive management. In its deliberations, appointments, decisions regarding remuneration, communications with shareholders and any other stakeholders, in its strategic planning, in the approval and design of other policies, as well as in any other matters within its competence, the Board of Directors shall be subject to the contents of this policy, assuming the firm commitment to apply and develop it.
- The Appointments and Remuneration Committee, which assumes as one of its powers the supervision of this policy and must report to the Board of Directors any breaches or deviations therefrom that it may observe.
- The Risk Committee, a body reporting to the Audit and Risk Control Committee, which must supervise and monitor the policy in day-to-day business decisions, applying the principles and commitments of this policy to conflicts of interest and other non-financial risk situations within its remit.
- The Risk and Compliance Department, which must supervise situations that may constitute a conflict, contradiction or breach of this policy by any Alantra Group team in all its areas of activity at a global level.
- Any advisory, executive or supervisory bodies that may be created by the Board of Directors or any body with executive power for the purpose of supervising and ensuring compliance with this policy.

VI. CHANNELS OF COMMUNICATION AND INFORMATION ON THE POLICY

Alantra is committed to maintaining the highest standards of transparency in its communications and to promoting the participation of different stakeholders in decision-making in the different activity areas. In an environment where information flows rapidly through mass digital media, Alantra recognises the importance of responsible, honest and truthful communication. In this regard, Alantra will apply the following guidelines:

- Alantra will report annually to its various stakeholders on the degree of compliance with sustainability objectives through a sustainability and social impact report¹. This report will

¹ This report may be called by different names and may overlap with the Non-Financial Information Statement.

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describe Alantra's situation and degree of compliance with the principles and commitments of this Policy, and will contain information on the initiatives and activities that generate social and environmental impact, as well as good corporate governance practices (the "**Sustainability Report**").

- In order to disseminate both the Sustainability Report and any other information of interest in relation to the promotion of Sustainability actions by the Company, Alantra will maintain open communication channels for its different stakeholders as provided for in its Financial and Non-Financial Communication Policy (available on Alantra's website).

In particular, Alantra will make this report available at the Annual General Shareholders' Meeting on the occasion of its approval, which will be made public on the Alantra Group's corporate website in the "Shareholders and Investors" section.

- As an entity under the supervision of the Spanish Securities and Exchange Commission ("**CNMV**"), Alantra shall submit all financial and non-financial information (including the Sustainability Report) to the CNMV when the Board of Directors prepares the Company's annual accounts.
- Alantra will maintain a corporate website available to shareholders, investors and general public with information about the company, news about the company and information for its investors. The Sustainability Report will also be published on this website.
- Alantra will maintain an open channel of communication with the Company (whistleblowing channel) to report or inform about any irregularity or breach of this Policy, or any other Alantra Group policy, and to analyse the facts reported in order to take the appropriate action for their solution.
- Alantra may disseminate any information in relation to this Policy through the media, social networks (i.e. press releases, institutional communications, news published by the media, etc.) or through the permanent attention to the queries and requests of shareholders, analysts and institutional investors through the Alantra's Investor Relations whose contact details are available on Alantra's corporate website.

28 February 2024