



# **Non-Financial Information and Sustainability Statement 2024**

**Audax Renovables, S.A. and subsidiaries**

**For the year ended on 31 December 2024**

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## 1. GENERAL INFORMATION (ESRS 2)

### 1.1 Basis of preparation

#### General basis for the preparation of the Sustainability Statement (BP-1)

The following is the Non-Financial and Sustainability Information Statement of Audax Renovables, S.A. and subsidiaries (hereinafter: "the Group", "Audax" or "the company"), a document which is part of the Directors' Report. The information in this document refers to the period between 1 January and 31 December 2024. The consolidation scope of the Non-Financial and Sustainability Information Statement (hereinafter: "Sustainability Statement" or "Non-Financial Information Statement") is the Group and corresponds to the scope of the financial statements.

The report has been prepared in accordance with Directive 2022/2464 of 14 December 2022 *Corporate Sustainability Reporting Directive* (hereinafter, CSRD) on corporate information on sustainability, however it complies with the general dispositions published in preceding Law 11/2018.

This Sustainability Statement meets the requirements established in Law 11/2018, of 28 December, amending the Commercial Code, the consolidated text of the Corporate Enterprises Act approved by Royal Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on Audit, concerning non-financial information and diversity information. This information can be found in Appendix 5.5 List of requirements under Law 11/2018 on non-financial information and diversity.

It also includes the information specified in article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088, as well as in the Delegated Regulations of the Commission. This information is featured in section 2.1 Disclosure of information under article 8 of Regulation (EU) 2020/852 (the Taxonomy Regulation).

The subsidiaries included in the consolidation scope are exempted from presenting individual or consolidated information on sustainability topics under article 19 bis or article 29 bis section 8 of Directive 2013/34/EU. The company has included explanatory information in the footnotes concerning certain specific indicators which have not been prepared in accordance with the scope of the report.

The Non-Financial Information Statement concerns primarily the core activities of the company. According to the double materiality assessment required by ESRS 1, the company has carried out an analysis of impacts, risks and opportunities of the sustainability topics featured in AR 16, taking into account its direct and indirect business relations as well as its upstream and downstream value chain. The assessment concludes that the company has not detected any material impacts, risks or opportunities related to the analysed sustainability topics in its value chain in neither of its upstream or downstream phases. A detailed explanation is provided in section 1.4 - Management of incidents, risks and opportunities.

The Group has not omitted elements of information on intellectual property, know-how or innovation results, nor has it used exemption from disclosure of upcoming events or matters under negotiation, in accordance with the provisions of article 19 bis, section 3 and article 29 bis section 3 of Directive 2013/34/EU.

#### Disclosure in relation to specific circumstances (BP-2)

##### Time horizons

The company's time horizons coincide with the definition in section 6.4 of ESRS 1, Definition of short-, medium- and long-term time horizons for reporting purposes.

The company establishes 2024 as its base year but includes in its Non-Financial Information Statement retrospective and prospective information on quantitative disclosure requirements reported in previous years in accordance with Law 11/2018 in order to facilitate understanding of the information disclosed with regard to the material sustainability material topics of the Group.

### **Assessment of the value chain**

The company does not have any control over the activities of the upstream and downstream phases of its value chain or of their business relations, therefore it is complicated to obtain certain information on the value chain, especially of its upstream phases.

After undertaking reasonable efforts, the company used indirect information sources as the median values of the sector and other alternative variables in the disclosure requirements concerning sustainability topics of ESRS E1 - Climate change. The information, the basis of its preparation and the degree of accuracy is described in section 2.2. corresponding to ESRS E1.

The company is pondering the implementation in the near future of a management software in order to improve the process of obtaining and improving the quality of the data on sustainability and its own operations and of the value chain in the future.

### **Sources of estimation and outcome uncertainty**

The Group has used sources of estimation and outcome uncertainty to calculate the data required by ESRS E1 on climate change. The information on sources and uncertainty is disclosed individually for each disclosure requirement.

### **Changes in preparation or presentation of sustainability information**

This is the first year in which Audax Renewables prepares its Sustainability Statement in accordance with the ESRS Directive. The company shall provide development data only regarding the information disclosed in previous years which presented the indicators required under Law 11/2018.

### **Reporting errors in prior periods**

During the year 2023 the company informed of 2 employees with errors in their age category, specifically in the subsidiaries located in Italy and The Netherlands.

### **Information derived from other legislation or from generally accepted pronouncements regarding information on sustainability**

This Non-Financial and Sustainability Information Statement meets the requirements established in Law 11/2018, of 28 December, amending the Commercial Code, the consolidated text of the Corporate Enterprises Act approved by Royal Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on Audit, concerning non-financial information and diversity information. This information can be found in 5.5 List of requirements under Law 11/2018 on non-financial information and diversity.

It also includes the information specified in article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088, as well as in the Delegated Regulations of the Commission. This information is featured in section 2.1 Disclosure of information under article 8 of Regulation (EU) 2020/852 (the Taxonomy Regulation).

The Non-Financial Information Statement includes information which is complementary to the data required by the applicable industrial regulations on non-financial information, specifically it includes information on Sustainability prepared by the Group corresponding to the year ended on 31 December 2024 (hereinafter, the information on sustainability) according to the provisions of Directive (EU) 2022/2464 of the European Parliament and of the Council, of 14 December 2022, on Corporate Sustainability Reporting (CSRD).

### **Incorporation by reference**

The company has incorporated information by reference to the consolidated financial statements according to the following data points: E1-5 DP 18 and AR 36 e); E1-6 DP 25 b); E1-6 DP 30.

## 1.2 Governance

### **The role of the administrative, management and supervisory bodies (GOV-1)**

The governance model of the company is comprised of the following administrative, management and supervisory bodies:

#### **Board of Directors**

The principal mission of the Board of Directors is to guide, administer and represent the Company within the scope of activities featured in its objects, to define the general strategy and indicate the guidelines for its management, while being committed to the transparency and veracity of the information of the Company in its relations with the shareholders and the markets in general.

The Board of Directors of Audax Renovables is the highest governing body and has two delegated committees: the Audit Committee and the Appointments and Remuneration Committee. The Board of Audax Renovables is unitary and is comprised of the chairman, four members (two of whom are women) and a non-member female secretary.

#### **Audit Committee**

The competence attributed to the Audit Committee includes supervision of the efficacy of the internal audit, the financial and non-financial information, including information on sustainability, internal control systems and systems of financial and non-financial risk management of the Company, as well as the preparation and presentation of the mandatory financial information in accordance with the regulations applicable at any time, which apply to the auditing process.

This committee is comprised of a chairman and two members, one of them female.

#### **Appointments and Remuneration Committee**

The Committee's principal responsibilities involve, among others, the evaluation of the skills, knowledge and experience necessary for the Board of Directors, to suggest to the Board of Directors the directors and senior management's remuneration policy, and to submit to the Board the proposals of director appointments.

At the end of 2022 the Company incorporated the position of Sustainability Manager, who reports directly, from the organisational point of view to the Appointments and Remuneration Committee and is member of the senior management. The Sustainability Manager reports periodically on the company's performance in ESG topics to the Committee and informs about the sustainability-related impacts, risks and opportunities.

Currently the Appointments and Remuneration Committee is comprised of a chairman and two members, one of them female.

#### **Roles and responsibilities of the administrative bodies concerning non-financial information and sustainability reporting**

The roles and responsibilities of the administrative bodies in exercising the supervision of the process of management of the impacts, risks and opportunities related to sustainability are featured in the Regulations of the Board of Directors and Regulations of the Audit Committee, both documents published in the corporate website.

#### **Expertise and skills of the administrative, management and supervisory bodies on sustainability topics**

The administrative bodies of Audax are comprised of the members of the Board and senior management, which, in turn, is comprised of the General Manager, the Group Chief Internal Auditor and the Sustainability Manager.

All its members have extensive experience and expertise concerning the impacts, risks and opportunities related to sustainability in the energy sector and, more specifically, with regard to the activities carried out by Audax. The members of the Board are also directors of other listed and unlisted companies, which also represent reliable sources of information about the management of sustainability topics in other businesses. The information on the expertise of the members of the Board with regard to the activities of the company and the industry in which it operates can be found on the corporate website of Audax.

The Sustainability Manager is the person with the most extensive knowledge in sustainability topics of the company. With her experience as sustainability advisor over a period of more than 8 years, her education and knowledge, she has the necessary expertise for the management of the ESG topics in the Group. The Sustainability Manager received specialised sustainability training designed for managers during the year 2023.

When necessary, the company relies on external specialists such as the Big Four companies and other recognised consulting firms to carry out specific works related to the management of material impacts, risks and opportunities. Moreover, in their reporting duties to the Audit Committee, the external auditors shall inform about the amendments and regulatory changes applicable to the Company, including in the sustainability topics.

**Information on composition and diversity of the members of the administrative, management and supervisory bodies of Audax Renovables**

The chairman of the Board of Directors is the only member with executive power. Moreover, 40% of the members of the Board are independent.

Furthermore, 40% of the Board of Directors of Audax Renovables are women. The Company has established the commitment to maintain as a minimum this percentage of female representation as part of the *Long-term Incentive Plan* approved in 2024.

Members	Position	Board of Directors	Audit Committee	Appointments Committee	Gender
Mr Francisco José Elías Navarro	Executive Director	Chairman	-	-	Male
Mr Ramiro Martínez-Pardo del Valle	Independent Director	Member	Chairman	Chairman	Male
Mr Josep Maria Echarri Torres	Independent Director	Member	Member	Member	Male
Ms Anabel López Porta	Proprietary Director	Member	Member	Member	Female
Ms Rosa González Sans	Proprietary Director	Member	-	-	Female
Ms Naiara Bueno Aybar	Non-member Secretary	-	-	-	Female

**Supervision of sustainability-related impacts, risk and opportunities**

The responsibility with regard to the preparation and approval of the double materiality assessment of Audax Renovables based on the impacts, risks and opportunities related to the sustainability topics of ESRS 1 is described in Chapter 1.4 Impacts, risks and opportunities management.

The Board of Directors is the supreme body responsible for the approval of the double materiality assessment of the company. The Sustainability Manager identifies and evaluates the impacts, risks and opportunities related to sustainability topics outlined in Appendix AR 16 in cooperation with the management of the company and reports to the Appointments and Remuneration Committee and the Board of Directors for their approval the methodology used and the results obtained. The approval of the goals and objectives related to the ESRS outlined in this report also lies with the Board.

The Board of Directors delegates the supervision and management of the sustainability-related impacts, risks and opportunities to the Sustainability Manager, who shall report, at least quarterly, to the Appointments and Remuneration Committee and to the Board on the IROs and sustainability topics that are material to the company.

In general, the members of the Board of Directors and its delegated committees have necessary knowledge to supervise sustainability topics in the company. The Sustainability Manager informs periodically the Board of Directors, through the Appointments and Remuneration Committee, about the management of the impacts, risks and opportunities in sustainability topics and is the ultimate body responsible for determining whether the Manager herself has the right skills for their management or whether additional specialised resources are necessary.

If the members of the Board of Directors and/or members of its delegated committees determine that the company does not have specialised skills and/or knowledge to supervise a sustainability matter, external specialised entities, such as the Big Four companies and other recognised consulting firms are engaged to conduct the assessment and specific tasks related to the management of the impacts, risks and opportunities derived from the matter in question.

#### **Information provided to the administrative, management and supervisory bodies of the company and sustainability topics addressed by them (GOV-2)**

The Sustainability Manager informs the Appointments and Remuneration Committee at least quarterly about material sustainability questions, and the Committee relays the information to the Board of Directors. The Sustainability Manager informs about the impacts, risks and opportunities, the trends and regulatory developments related to the sustainability topics and the energy industry. All the decisions made by the company concerning the management of the sustainability topics reported to the Committees shall be relayed to and, if necessary, subsequently approved by the Board of Directors.

The Internal Audit Manager and the external auditors have the obligation to inform the Audit Committee about the changes in the financial regulations applicable to the Company, including sustainability topics.

The administrative bodies and their members take into account the sustainability-related impacts, risks and opportunities at the moment of making strategic decisions concerning important transactions, risk management process, internal control system or decision that may affect the everyday operation.

The Board addressed the complete list of impacts, risks and opportunities drawn-up by the company for the assessment of double materiality as part of the process of approval of the assessment, focusing on those that are material to Audax. Moreover, the Board has promoted various projects and initiatives related to the IROs identified during the year, such as: approval of the anti-corruption policy, approval of the plan of training on Compliance, approval of the necessary works for the calculation of the carbon footprint and the definition of the decarbonisation goal, among others.

#### **Integration of sustainability-related performance into the incentive schemes (GOV-3)**

In order to realise the ambitious strategic plan of the Group in the coming years the effort, commitment and involvement of its managers is essential. Therefore, in 2024 the Board of Directors approved the Long-term Incentive Plan of the Group for the years 2024-2026, intended for the executive directors, managers and key employees.

In this context Audax has put into operation an incentive plan ("Plan"), which allows its managers and key employees to participate in the creation of value and to obtain the right to receive the incentives after fulfilling the established requirements. The main object of the Plan is to incentivise, motivate and retain the management team and the key employees by offering them an incentive linked to the performance of the strategic plan. Thus it is possible to align the interests of the beneficiaries with those of the shareholders of Audax by offering them a competitive remuneration in accordance with the remuneration practices of the market and the organisational and strategic situation of the Group.

The Plan consists in assigning to each beneficiary at the beginning of the Plan a number of "Units", which will give them the right to a number of shares of Audax equivalent to the assigned units weighted by a determined percentage depending on the degree of fulfilment of the specified goals. The Plan is linked, among others, to the fulfilment of certain goals in the area of the ESG.

The goals in the area of sustainability established by the company to be achieved by 2026 are the following: to provide training in Compliance to all the employees, to maintain the balanced presence of women and men in the management and senior management of the Group and to fulfil the decarbonisation objectives, whose approval is expected in 2025. The weight of the ESG goals in the long-term incentive is of 10%.

The Plan is supervised by the Chairman of the Board of Directors and the General Manager of Audax, according to the instruction of the Board of Directors and the terms and conditions of the incentive are regulated in the document "General Conditions".

#### **Statement on due diligence (GOV-4)**

The company provides a reference to the chapters and sections where the elements of the due diligence process are addressed, mainly in order to identify, prevent and mitigate all the possible sustainability-related risks that could affect the company, the environment and the community in general as a consequence of its activities.

Audax has implemented diverse processes and internal policies in order to identify, prevent and mitigate the aforementioned risks. Those consist, among others, of the corporate risk management system, which includes the sustainability-related risks, the Corporate Code of Ethics and the Environmental Policy.

<b>Element of due diligence</b>	<b>Chapter</b>	<b>Section</b>	<b>Page</b>
Integration of due diligence into the governance, strategy and business model	1	1.2; 1.3; 1.4	5; 9; 17
Cooperation with the interested parties affected in all the key phases of due diligence	1	1.3	9
Identification and assessment of the negative impacts	1	1.4	17
Adoption of measures to mitigate, repair or compensate the negative impacts	2; 3; 4	E1-3; E4-3; S1-3; S4-3; G1-3	35; 44; 51; 60; 67
Monitoring of the efficacy of these efforts and communication	2; 3 ; 4	ESRS 2 GOV-3; E1-3; E4-1; S1-4; S4-4; G1-3	7; 35; 41; 52; 60; 67

#### **Risk management and internal controls over sustainability reporting (GOV-5)**

In order to meet the obligations under the applicable regulatory framework: CSRD, Law 11/2018, regulation of the CNMV, Corporate Enterprises Act, Good Governance Code of Listed Companies approved by the National Securities Market Commission (CNMV), and associated circular 1/2020, European Regulation 852/2020 on Sustainable Finance Taxonomy, the company shall disclose each year the sustainability statement related to that year. The responsibility for risk management and internal controls over sustainability reporting lies with the Board of Directors, which delegates the supervision of the internal control systems to the Audit Committee.

Within the responsibilities attributed to the Audit Committee there is the supervision of the efficacy of the internal audit services, the financial and non-financial or sustainability reporting, internal control systems and the systems of financial and non-financial risk management of the Group.

The process of gathering and consolidation of the sustainability information made available to the stakeholders requires the application of internal controls and reviews to ensure the reliability and quality of the reported information. With this regard, the Sustainability department is responsible for the preparation and consolidation of the Group's Sustainability Statement. The Sustainability Manager defines the criteria to be used in the report based on the regulatory frameworks in the area of sustainability applicable to the company and is responsible for identifying and assessing the sustainability-related impacts, risks and opportunities.

In order to prepare and consolidate the information, the sustainability manager coordinates the process of gathering information with the managers of the subsidiary companies and their areas of responsibility. During this phase a control layer is applied by conducting controls of the contents of the qualitative information and carrying out comparisons of quantitative information and the data reported in previous years, all this supported by the internal documentation of the areas.

The responsibility for approving the Non-Financial Information Statement or the Sustainability Statement lies with the Board of Directors upon presentation and approval of the Audit Committee. Moreover, the sustainability report is subject to annual verification conducted by a third independent party, which provides another supervision layer, the verification being required by the ESRS Directive on sustainability reporting.

### **1.3 Strategy**

#### **Strategy, business model and value chain (SBM-1)**

##### **Business model**

Founded in the year 2000, Audax Renovables is an independent energy Group present in 9 countries, listed on the Spanish continuous market and whose activities are centred on supplying electricity, gas and guarantees of origin (hereinafter, "GOs"), as well as on the generation of 100% renewable energy. Its business model is based on vertical integration, guaranteeing efficient supply of energy to its clients.

After more than two decades in the energy sector, the Group is undergoing the expansion process. At the end of 2024 the Group is comprised of 84 subsidiary companies and has a team of 783 employees in different countries across Europe, as stated in section 3.1 corresponding to ESRS S1 - Own Workforce.

In 2024 Audax supplied 15.5 TWh of energy to more than 426,000 customers in 8 European countries (Spain, Portugal, France, Italy, The Netherlands, Germany, Poland and Hungary) and generated 305 MWh of electricity from renewable sources in its solar plants and wind farms located in Spain, Poland, France and Panama.

Its main objective is to lead the energy transition in its sector, continuing its activity of electricity, gas and GOs supply, investing in the business of electricity generation from 100% renewable sources and contributing to the improvement of the European energy mix and reduction of CO<sub>2</sub> emissions to the atmosphere.

##### **Main activities and services of Audax Renovables**

###### **Electricity and natural gas retail**

Audax Renovables is mainly involved in selling electricity, gas and GOs. The Group's main business activity is to supply electricity, gas and GOs to businesses and individual clients through the retailing activity carried out in several European countries: Spain, The Netherlands, Hungary, Poland, Portugal, Italy and Germany.

The enterprise carries out activities related to the retail of natural gas, considered as fossil fuel according to the definition of the Regulation (EU) 2018/1999 of the European Parliament

In 2024 the Group supplied a total of 15.5 TWh of energy to over 426,000 clients, 54% of which were domestic customers. As part of its commitment to sustainability and promotion of renewable energy, it should be noted that 11% of the electricity supplied by the Group has been certified as renewable.

The clients to whom Audax provides its services are mostly businesses and household customers located in Europe, specifically in the following countries: Spain, Hungary, The Netherlands, Italy, Poland, Portugal and Germany.

It is important to differentiate the activity of the retail companies from the suppliers. The activity of a retailer is centred on the purchase of energy and GOs from the market in order to supply them to the end client and on carrying out the invoicing services, while the supply companies are responsible for managing the physical infrastructure and maintenance of the electricity and gas lines to enable the supply of energy to the households. This is the reason why Audax has no control over the management or operation of the infrastructure or installations of the energy it retails.

###### **Generation of energy from renewable sources**

In 2016 the Group decided to extend its activities and become involved in the production of energy from 100% renewable sources using wind and solar photovoltaic technology, and consequently become a vertically integrated company.

At the close of the year the Group owns a portfolio of wind and photovoltaic projects with the capacity to generate 955 MW, which generated 305 MWh in 2024. The projects are located in Spain, France, Poland, Portugal, Italy and Panama and are in different stages of development and operation. The information on the situation of the portfolio is available to the stakeholders through the quarterly and half-yearly reports of the company published on the corporate Website.

Renewable sources are at the core of energy transition, and therefore the main goal of the Group is to increase the number of energy generation projects and provide the company with a robust portfolio of projects. The energy generation projects are being carried out according to the best practices of construction and operation of power plants, ensuring the protection of the environment, compliance with the applicable legislation, preservation of biodiversity and conservation of historic heritage, ensuring the welfare of the local communities where it operates. For the construction of new power plants Audax purchases all the necessary materials and modules from external providers of recognised prestige, who meet the high quality and environmental standards, and throughout the year has not identified any risks or impacts related to the input of the power plants or its procurement.

#### **Significant sectors and banned products**

The company is mainly involved in selling electricity, gas and GOs. The gas it sells comes from fossil fuels, and all the activities related to fossil fuels are considered one of the main causes of the climate change. In 2024 the company retailed 4.9 TWh in Europe and the income related to this activity represents 31% of the total income of the Group.

The company does not render any services nor does it sell any products considered as banned in neither of the countries where it operates.

#### **Goals related to sustainability**

As a part of its commitment to sustainability, the Group has continued working on the implementation of the Sustainability Strategic Plan during the reporting period. Various projects and initiatives have been carried out to address the identified impacts, risks and opportunities.

The achievement of the following goals during 2024 should be noted:

- Increase of the installed capacity in the generation project portfolio.
- Approval of the Anti-Corruption Policy.
- Approval of the Gifts and Hospitality Policy.
- Calculation of the carbon footprint for the 3 scopes.
- Update of the Corporate Risk Map.
- Approval of the plan of training in Compliance.

The most important goal with regard to sustainability of the company is to increase the installed capacity of the generation portfolio and to have power plants of renewable energy in all the countries where the Group currently sells electricity. The Group has continued working on the expansion of the portfolio and on the construction of solar plants in 2024 and will continue doing it in the long term.

Various policies have been defined at the Group level, thus meeting the goals previously set, which were approved by the Board of Directors during the year, as well as the update of the corporate risk map and the plan of training in Compliance, among others.

The company has also worked on the calculation of the carbon footprint for the 3 scopes for the first time and continues working on establishing a decarbonisation goal, whose approval is expected in 2025, in accordance with the Sustainability Strategic Plan 2023-2025.

Audax encourages and actively promotes the use of energy from renewable sources among its stakeholders, especially among its clients. It provides information on how to certify the energy used as renewable through the acquisition of the guarantees of origin in order to contribute to the global objectives to reduce the greenhouse gas emissions. It also offers to its clients the self-supply installations of solar panels as an alternative to the contaminating sources that they currently use.

At the close of the year 11% of the total volume of energy supplied by the Group was certified as renewable, which shows that there are no short-, medium- or long-term signs of any significant changes that could arise in the demand of our clients.

The Group has likewise worked on extending the services and products offered to the clients with regard to energy efficiency by developing solutions, which will help reduce the energy consumption as well as the invoice amount. In this case the company is developing an application to monitor the consumption in real time and the time frames of the day when the price of the energy is more economical.

Looking ahead, the company is very aware of the challenges it faces with regard to waste management and circular economy. The complex materials, the volume of the wind turbine blades, the limitations of recycling and reusing this kind of equipment - these are all challenges faced by the sector, and to which the industry is allocating multiple resources to develop technology capable of responding to these challenges. The average life cycle of the power plants of the Group is of 20 years, therefore this question be material for Audax in the future.

### **Corporate strategy**

The strategy of the company integrates material sustainability questions, which affect directly the company's business. The elements of the company's strategy related directly to the ESRS that are material for the company are outlined below:

#### **Climate change mitigation (ESRS E1)**

One of the strategic pillars of Audax is to become a vertically integrated company in all the markets where we operate. The future goal is to increase the installed capacity of the generation portfolio and to have power plants of renewable energy in all the countries where the Group currently sells electricity.

As a part of its commitment to the protection the natural environment and the fight against climate change, Audax has worked during 2024 on calculating the carbon footprint for the three scopes and on defining a decarbonisation goal towards 2030 in its principal activity: the retail of electricity.

#### **Energy (ESRS E1)**

The company is also striving to expand its product portfolio by focusing on offering services and installations to improve the energy efficiency and alternatives for the consumption of renewable energy.

#### **Focus on the people and improvements in the organisation model (ESRS S1)**

The company continues working on the consolidation of its team. The human resources department is leading the "Organizational Project", which allows the company to strengthen the functions of the Group, to standardise the organisation and operation model of own employees of the Group, to clarify the function and reporting lines at all levels of the company and to identify the positions most exposed to potential risks.

#### **Business conduct (ESRS G1)**

- **Fostering corporate culture:** The consolidation and promotion of the corporate culture and the values of Audax among the employees is one of the strategic goals of the company. In 2024 the company appointed a Group Compliance Officer as the leading manager for the task of fostering and building up the company's corporate and compliance ethics.
- **Prevention of corruption and bribery:** In 2024 various actions were carried out, such as the approval of the Anti-Corruption and Bribery Policy of the Group and a training for employees in these topics. ESRS 4 on business conduct features information concerning disclosure and performance of the company with regard to the aspects mentioned above.

#### **Sustainability Strategic Plan 2023-2023**

As a part of the commitment of the company to sustainable development and integration of sustainability topics in the corporate strategy, the Board of Directors approved in 2023 the Sustainability Strategic Plan. The plan defines a roadmap to achieve the company's goals regarding sustainability, manage the identified impacts and risks and take advantage of the opportunities.

The plan intends to give a response to the main challenges, which the Company is facing, in the three sustainability pillars: environmental, social and corporate governance. In response to these challenges, the plan is centred around four strategic lines: **"Sustainable leadership"**, **"We protect the natural environment"**, **"Together we can do more"** and **"Compliance Culture"** under the common goal of improving the ESG performance in each of these areas and become a progressively more sustainable company. The plan outlines 40 projects and/or initiatives with specific goals based on the sustainability questions that are material for the Company during the period of 2023-2025.

## Value chain

The following table shows the value chain of Audax:

Upstream	PRODUCTION	INTELLECTUAL CAPITAL	FINANCIAL CAPITAL	INTELLECTUAL CAPITAL	SOCIAL CAPITAL
	<ul style="list-style-type: none"> <li>- Energy producers</li> <li>- Electricity and gas generation technologies</li> <li>- Mining, natural deposits, etc.</li> </ul>	<ul style="list-style-type: none"> <li>- Talent: engineers, technicians, construction and maintenance</li> <li>- Advisors</li> <li>- Auditors</li> <li>- Suppliers</li> </ul>	<ul style="list-style-type: none"> <li>- Shareholders</li> <li>- Creditors</li> <li>- Investors</li> <li>- Bondholders</li> </ul>	<ul style="list-style-type: none"> <li>- Licences and contracts</li> <li>- Sector procedures</li> <li>- Investigation and Development (I+D)</li> <li>- Patents</li> </ul>	<ul style="list-style-type: none"> <li>- Government Institutions</li> <li>- Competitors</li> <li>- Local development programmes</li> <li>- Local communities</li> <li>- Associations/NGOs</li> <li>- ESG Ratings</li> </ul>
<b>Audax Renovables</b>	<b>ACTIVITIES</b> <ul style="list-style-type: none"> <li>- Electricity, gas and GOs retail</li> <li>- Electricity generation from renewable origin via solar and wind farms</li> </ul>	<b>COUNTRIES</b> <ul style="list-style-type: none"> <li>- Spain</li> <li>- Hungary</li> <li>- The Netherlands</li> <li>- Italy</li> <li>- Portugal</li> <li>- Poland</li> <li>- Germany</li> <li>- France</li> <li>- Panama</li> </ul>	<b>FINANCIAL CAPITAL</b> <ul style="list-style-type: none"> <li>- Revenues, profits</li> <li>- Taxes</li> <li>- Investments</li> <li>- Green finance</li> <li>- Green bonds</li> <li>- Donations</li> </ul>	<b>ORGANISATION STRUCTURE</b> <ul style="list-style-type: none"> <li>Board of Directors</li> <li>Corporate Functions</li> <li>- Human Resources</li> <li>- Front office</li> <li>- Finance</li> <li>- Legal</li> <li>- Marketing</li> <li>- Customer Service</li> <li>- Sustainability</li> <li>- Risks</li> </ul>	<ul style="list-style-type: none"> <li>Strategy and transformation</li> <li>Commercial</li> <li>Middle office</li> <li>General Services</li> <li>Generation</li> <li>Validations</li> <li>IT</li> <li>Internal Audit</li> </ul>
Downstream	<b>DISTRIBUTION</b> <ul style="list-style-type: none"> <li>- Electricity and gas distribution network</li> <li>- Market operators</li> <li>- Retailers or distributors</li> </ul>	<b>SALES CHANNELS</b> <ul style="list-style-type: none"> <li>- Direct sales</li> <li>- Indirect sales</li> <li>- Online sales</li> <li>- Resellers</li> </ul>	<b>CUSTOMERS</b> <ul style="list-style-type: none"> <li>- Large clients</li> <li>- SMEs</li> <li>- Public bodies</li> <li>- Domestic clients</li> <li>- Bilateral agreements (PPAs)</li> </ul>	<b>NATURAL CAPITAL</b> <ul style="list-style-type: none"> <li>- GHG emissions</li> <li>- Materials</li> <li>- Waste</li> </ul>	<b>INTELLECTUAL CAPITAL</b> <ul style="list-style-type: none"> <li>- Licences and contracts</li> <li>- Sector procedures</li> <li>- Investigation and Development (I+D)</li> <li>- Patents</li> </ul>
					<ul style="list-style-type: none"> <li>- Government Institutions</li> <li>- Competitors</li> <li>- Local development programmes</li> <li>- Local communities</li> <li>- Associations/NGOs</li> <li>- ESG Ratings</li> </ul>

## Interests and opinions of the stakeholders (SBM-2)

Audax carries out an annual review of the stakeholders map as a part of the materiality analysis in order to prioritise them and to identify potential new stakeholders. The analysis is conducted taking into account the expertise of the managers of the company and the context analyses carried out. The company takes into consideration the expectations and needs of its stakeholders in the decision-making and corporate strategy, either by direct consultation or through public information or external specialised consulting firms.

The information on the main stakeholders of Audax Renovables is outlined below:

Stakeholders	Cooperation process	Integration in the company
Customers	Customer Service or Customer Care through in-person or digital communication (in person meeting, telephone, e-mail, traditional mail, WhatsApp, etc.)	Evaluations are made for the managers to identify opportunities of improvement in customer experience. The insight into the consumer needs, consumer habits and preferences provide the company with ideas on how to improve the services and products it offers.
Own workforce	<ul style="list-style-type: none"> <li>- Direct monitoring channels, such as the managers and HR.</li> <li>- Suggestion box</li> <li>- Whistleblowing channel</li> <li>- Through the representatives of the employees in the subsidiaries where they are available.</li> </ul>	Action plans are being implemented to foster the corporate culture, boost professional development and improve the reconciliation of personal life and professional activity.
Shareholders, bondholders and investors	<ul style="list-style-type: none"> <li>- Presentation of quarterly results.</li> <li>- Holding the annual General Meeting of Shareholders.</li> </ul>	There is an active relation of transparency and communication concerning the company's strategy and goals. In 2024 the General Meeting of Shareholders was held, where questions of their interest and/or concern can be brought up.
Suppliers, contractors and business partners	Communication with the suppliers and contractors during the purchase process.	Implementation of improvements and suggestions in the purchase process in order to strengthen the internal control.
Public administration and organisations	<ul style="list-style-type: none"> <li>Complying with the regulatory procedures to obtain the permits necessary to carry out the activities.</li> <li>Cooperation meetings with public administration bodies.</li> </ul>	Adaptation and update of internal processes and documents to implement the applicable legal requirements.
Media	Through press notes, meetings with the media, corporate websites and social networks.	The company strives to convey an image of a sound company and bears in mind the importance of reputation in achieving the company's goals.
Auditors	Annual audits	The audits are used by the company to detect points of improvement in the internal processes in order to improve the internal controls and meet the disclosure requirements.
Competitors	Surveys	The opinions of our competitors in sustainability topics are a key source of information for the assessment of our own ESG strategy.
ESG Ratings	Qualification processes (EthiFinance, Sustainalytics, CDP)	The evaluation criteria and the qualifications of the ESG ratings are important for the purpose of prioritising the ESG strategy.

### Material impacts, risks and opportunities and their interaction with the strategy and business model (SBM-3)

As a result of double materiality assessment Audax has identified the following material impacts, risks and opportunities:

ESRS	Topic	Sub-topic	Impact, Risk or Opportunity	IRO
E1	Climate change	Climate change mitigation	Impact	Direct and indirect emission of greenhouse gas by the activity of retail of natural gas and of electricity from renewable sources
			Impact	Purchase of guarantees of origin (GOs).
			Opportunity	Definition of a decarbonisation goal at the Group level
			Risk	Changes in the customer demand for green energy.
	Climate change adaptation		Risk	Risk of not achieving the goal to reduce the global warming to 1.5°C and that the energy transition will not advance as expected.
			Risk	Possible climate risks of transition related to the retail of gas.
	Energy		Impact	Promotion of technological innovation and development in the sector of renewable energy through the implementation of energy storage technology.
			Impact	Promotion of renewable energy to reduce the dependence on fossil fuels.
			Impact	Fair pricing of the energy invoice to improve the customer experience.
			Impact	Implementing technology solutions to improve the energy efficiency and reduce the cost of energy for the end client.
			Risk	Energy price volatility.
			Risk	Risk of decrease of demand for renewable energy and/or GOs because of an increase of cost in the client invoice.
			Risk	Inadequate management of the purchase/sale of energy (electricity and gas) and GOs.
			Risk	Political instability and global geopolitical conflicts that may affect the changes in the price of and demand for energy.
E4	Biodiversity and ecosystems	Direct impact drivers of biodiversity loss	Impact	Loss of biodiversity and ecosystems through direct use of rural land for the construction and operation of power plants.
		Impact on the state of the species	Impact	Deaths, accidents and rescues of species in areas and surroundings of power plants.
S1	Own workforce	Working conditions	Impact	Representation of the employees by trade union or Works Council
			Impact	Occupational accidents, diseases or fatalities of own workforce and self-employed workers.
			Impact	Create stable and quality employment.
			Impact	Pay gap by gender
			Impact	Reconciliation measures that support the distribution between professional and personal time.
			Impact	Own workforce covered by collective agreements
			Impact	Training programmes for the employees
			Impact	Employee performance evaluation model

ESRS	Topic	Sub-topic	Impact, Risk or Opportunity		IRO
S4	Consumers and end-users	Impacts related to the information for consumers and/or end-users	Impact	Communication channels for customers' complaints and requests	
			Impact	Privacy of information and client data breaches	
			Impact	Access to quality information	
			Impact	Indirect sales channels that use dishonest marketing practices	
		Personal security of the consumers and/or end users	Impact	Incidents related to the use and maintenance of the gas installations by customers and end users	
			Impact	Restrictions in contracts with customers in situations of social exclusion	
		Social integration of consumers and/or end users	Impact	Fostering corporate culture.	
			Impact	Media exposure of the CEO and majority shareholder of the Group	
			Risk	Risk of greenwashing of the actual impact of the business and its core activities	
			Risk	Not identifying irregular conduct because of the lack of confidence in the whistleblowing channel	
G1	Business conduct	Corruption and bribery	Risk	Risk of incidents related to corruption, bribery and/or fraud of the employees of the Group	
		Management of the relations with suppliers including payment practices	Impact	Evaluation of suppliers implementing environmental and social criteria according to the CSDDD European Directive	
			Risk	Related party transactions.	

### Climate change

The fight against the climate change and the commitment to the energy transition are two of the main challenges addressed by the Group in the area of sustainability. The company is changing the way of producing, distributing and consuming energy, and the regulators are promoting policies of climate neutrality, which prioritise renewable energy consumption over fossil fuels as a pathway to decarbonisation. Fossil fuels and all the activities related to them are one of the main causes of the climate change, and renewable sources constitute the main factor for the transition towards low-carbon economy. As a result of the materiality analysis the company concluded that the risks and impacts identified with regard to the change are primarily associated with the energy transition and the European legislation applicable in this context. The company has not conducted an analysis of resilience of its strategy and its business model as such, but did carry out an analysis of climate risks derived from climate change, applied to the generation assets. The results obtained from the application of the tool indicate that the total risk level, considering all the threats, is similar in almost all the assets due to the similarities of the installations, and is "Low" or "Minimal" in great majority. With the exception of the photovoltaic plant located in the region of Toledo in Spain, which is the only asset, whose risk is "Moderate" in a scenario of high emissions in 2050, due to the extreme heat in the region and possible loss of efficiency resulting from it.

The majority of material impacts and risks identified with regard to climate change do not have significant effects expected in the short, medium or long term, however the company is striving to respond to such impacts and therefore has worked on the calculation of the carbon footprint for the 3 scopes during the year 2024 and has begun working on defining the first decarbonisation goal of the Group, whose approval is expected in 2025, as described in chapter 2.2 Climate change (ESRS E1).

### **Biodiversity and ecosystems**

The solar and wind farms have direct impact on biodiversity and ecosystems, such as the loss of biodiversity and ecosystems by direct use of rural land for the construction and operation of power plants, or the deaths, accidents and rescues of species in areas and surroundings of power plants, and therefore there is high regulatory pressure for the implementation of measures of protection of the natural environment and ecosystems during all the stages of development of the projects. For each of the power generation projects environmental impact studies are conducted, as well as environmental management and monitoring plans are drawn up, and specific prevention and mitigation measures are implemented, adapted to the characteristics of the area and the species inhabiting it, always in compliance with the environmental and social requirements established by the administration.

In 2024 the company did not identify any risk concerning the loss of biodiversity or related to the loss of species at risk of extinction or vulnerable to it.

### **Own workforce**

#### **- Working conditions**

The company has identified six material impacts related to the working conditions, two of which are negative and four are positive. The identified negative impact related to adequate wages is actual and is due to the pay gap by gender of the Group and that the majority of the management team of the company is comprised of men, thus creating a significant pay gap in the management positions. The second negative impact identified is a potential impact and is connected with potential accidents that the employees could suffer. The company has low accident rates, but the IRO is linked to the protection of human rights and workers' rights where the criteria of severity prevails over probability.

With regard to the four positive actual and material impacts, the company has identified the creation of quality employment, promotion measures for the reconciliation of the professional and personal life, the freedom of association of the employees and the number of employees covered by collective agreements as material IROs.

#### **- Equal treatment and opportunities**

The company has identified six material impacts related to equal treatment, of which five are actual positive impacts and one is a potential negative impact. With regard to the material positive impacts the company has identified IROs related to the improvement of the organisation model as a goal of the corporate strategy, the training programmes offered to the employees, the model of performance assessment, the new onboarding programme implemented in 2024 and employment of persons with disability. The only potential negative impact that is material for the company are the possible situations of workplace harassment, mobbing or any situation of difference in treatment or opportunities that may arise in the company and affect its employees.

The only potential negative impact is connected with possible violations of the fundamental rights of the employees that may affect own workforce. Despite of the company having only own workforce in the European countries where the regulations are very stringent with regard to the respect of the fundamental rights of the workers, as it is a sustainability topic related to the human rights, the criteria of severity prevails over probability, thus making material the subject. The company has not identified any material risk or opportunity related to own workforce.

## **Consumers and end-users**

Being a listed company it is essential to make available to the end clients transparent and accessible information on the services and products offered by the company, the prices and the organisation policies, which will allow the clients to make informed decisions according to their needs and expectations.

All the subsidiaries have their own Customer Service Department centred around giving a personalised response to any possible concerns, doubts, incidents and/or complaints of their clients to address the identified negative impacts. Moreover, in order to evaluate the quality and remedies provided to the clients, the company collects its feedback through satisfaction surveys in order to evaluate the service received and analyses the reviews included in public websites by its clients.

The company is particularly sensitive to the privacy of its clients and protection of their personal data, and therefore a positive impact has been identified in this subtopic.

## **Business conduct**

The impacts and risks identified with regard to the corporate culture and corruption are closely related. The company focuses on fostering corporate culture and therefore has approved in 2024 the Compliance Training Plan. Regarding the management of relations with suppliers, the company needs to work in the upcoming years on adapting the CSDDD European Directive in order to strengthen the control system of the value chain in the aspects related to the environment and human rights.

### **1.4 Management of impacts, risks and opportunities**

#### **Description of the process of determining and evaluating material impacts, risks and opportunities (IRO-1)**

##### **Double Materiality Assessment**

The process carried out by the company in order to determine and evaluate material impacts, risks and opportunities (hereinafter, the IROs) has been based on the process outlined in ESRS 1 and in the *Materiality Assessment Implementation Guidance* published by EFRAG.

Beginning by the list of sustainability topics outlined in Appendix A (AR 16) of ESRS 1 of Delegated Regulation (EU) 2023/2772, the company carries out an identification of the IROs and a subsequent assessment in order to determine which of the IROs identified are material for the company. There are two assessment perspectives: the materiality of impact and the financial materiality. An IRO becomes material if it is so in any of the two perspectives.

The double materiality assessment is conducted annually by the Sustainability Manager in cooperation with the management of the organisation. The results obtained are submitted to the Board of Directors and to the Appointments and Remuneration Committee for approval.

Below there is a summary of the methodology applied to carry out the assessment:

##### **Step 1: Understanding the context**

- **Preliminary analysis of the potentially material issues related to own activities, corporate strategy and business plan:** The company analyses its strategy, the regulatory context, the financial statements and the industry trends in connection with the sustainability topics of Appendix A (AR 16) of ESRS 1. The analysis is centred on own activities in the countries where the company operates and its business relations throughout the value chain. The analysis takes into account the internal policies and procedures of the company.

The double materiality assessment is based on the corporate risk map of the company, where the most significant risks are identified, including the ESG risks. Both processes are complementary; the assessment of financial materiality of the risks included in the IROs register is coherent with the assessment of the risks evaluated in the risk map.

The information thus collected gives a preliminary list of the IROs and allows to identify sustainability topics that are potentially material according to the management and the stakeholders. The preliminary list will be the basis for drawing up the register of IROs in the next step.

- **Analysis of the value chain:** The analysis covers business operations within own operations as well as upstream and downstream of the value chain, identification of risks, impacts and opportunities related to each chain actor, and sustainability topics specified in RA 16 of ESRS 1. Audax does not have operating control or power to influence the actors of its value chain, neither upstream nor downstream. Due to these characteristics, there are limitations on obtaining information from suppliers and clients.
- **Understanding the affected interested parties:** The Group maintains fluent and transparent relations with stakeholders, considering it as essential to understand their expectations and needs related to the company's activity and the risks to which they might be exposed. In 2024 the stakeholders map was reviewed as a part of the double materiality assessment. The company is aware of the importance of obtaining a complete view of the internal and external impacts of Audax, as well as of incorporating the perspective of its stakeholders to prioritise the material subjects.

As a part of the double materiality assessment the company consulted its stakeholders by conducting a survey among a sample group of stakeholders, where all the significant groups specified in section 1.3 of the Strategy were represented. The survey asked the respondents to prioritise the sustainability subjects they considered material to Audax from the impact perspective as well as from the finance perspective. The results of the survey conducted among the stakeholders are included in the preliminary assessment of materiality carried out by the management.

### **Step 2: Identification of the sustainability-related actual and potential IROs**

In this phase of analysis, the company draws up a list of actual and potential business IROs based on the conclusions obtained during the previous step and the information disclosed in the Non-financial information statements of the previous years, the corporate risk management process and the internal control system and, in general, all the internal policies and processes of the Group.

The methodology used to elaborate the list is based on the method described in the "ESRS Implementation Guidance - Materiality Assessment" published by EFRAG, and the classification of IROs meets the CSRD requirements.

Each identified IRO is linked to the materiality topics, sub-topics and/or sub-sub-topics included in Appendix A of ESRS 1. The list includes a detailed description of the IRO, its geographical location, its position within the value chain, the affected activity, the time horizon applicable and whether it is related to the Human Rights, such as outlined in the Regulation.

The company has identified a total number of 82 IROs, 48 of which are impacts, 29 are risks and 5 are opportunities.

### **Step 3: Analysis and determination of sustainability-related material IROs**

In accordance with the Directive, this sustainability statement is based on an assessment of double materiality, which determines material sustainability topics of Audax Renovables. The double materiality parts from the premise that a sustainability matter can be material to the company in two dimensions, in terms of impact and in terms of finance, as defined in ESRS 1.

#### **Impact materiality**

Impact materiality evaluates the actual or potential, positive or negative impacts of the company on people and/or the environment over a short-, medium- and long-term. The assessment includes an evaluation of impacts related to the company's own operations as well as upstream and downstream value chain, including the impacts connected with its activities, services and business relations.

## Determining the impact materiality

Audax has applied the severity and probability criteria to evaluate the materiality of the identified impacts, depending on their characteristics and whether these are actual or potential, negative or positive impacts. With regard to the actual and negative impacts, the materiality is based on the magnitude, extent and irremediable character of the impact, while for the positive impacts the materiality is based on the magnitude and the extent. With regard to potential impacts, the materiality includes the likelihood of their occurrence.

$$\text{Impact materiality assessment} = \text{Severity} \times \text{Probability}$$

$$\text{Severity} = \text{Magnitude} \times \text{Extent} \times \text{Irremediable character}$$

### Definition of thresholds of impact materiality:

The **severity** of a determined negative impact, whether actual or potential, is evaluated depending on its effect on people and/or the environment. The company has determined its thresholds for quantifying the severity based on three criteria:

- **Scale:** Represents the degree to which the impacts may affect the activity of the company. It is quantified from 1 to 5, the 1 representing a low scale and the 5 a high scale, depending on the consequences and time horizons of the impact on the company, the environment and/or the community in general.
- **Scope:** Quantifies the extent of the impact and considers the number of affected subsidiaries, persons or ecosystems. It is quantified from 1 to 5, the 1 representing a low scope and the 5 a high scope.
- **Irremediable character:** Represents the measure in which it is possible to remediate the impact. It takes into consideration the limits existing at the time of restoring the affected ecosystems to a situation at least equivalent to that in which they were in before the negative impact occurred. It is quantified from 1 to 5, depending on whether the impact can be remediated immediately or whether the consequences of the impact are irremediable by the company, the environment or people in general. It applies only to negative impacts.

The **probability** evaluates the likelihood of occurrence of a potential impact statistically. It is linked to the percentage of probability of occurrence based on the identified impacts. The probability is quantified from 0.2 to 1, of which 0.2 is the lowest probability and 1 means that the likelihood of occurrence is between 80% and 100%.

### Assessment criteria depending on the type of impact:

With regard to the **actual and negative impacts**, the materiality thresholds are based on the severity of the impact, while for the **positive impacts** the materiality is based solely on the scale and the scope. For actual impacts the probability is considered to be 1.

The materiality thresholds for **potential negative impacts** are based on the severity and its three criteria (scale, scope and irremediable character), as well as on the probability of occurrence. In the case of potential positive impacts the procedure is the same, but without taking into account the irremediable character.

If the identified impact is related to the Human Rights, as defined in paragraph 45 of ESRS 1, the severity of the impact takes precedence over its likelihood at the time of assessing its materiality.

## Financial materiality

A sustainability matter is material from the financial point of view if it produces or can be expected to produce significant financial effect on the company or can affect directly or indirectly the development, financial situation, financial performance, cash flows, access to financing or the cost of capital over a short, medium or long term. Financial materiality quantifies in financial terms the impact, which the identified risks and opportunities of the company could have if they materialised. The assessment carried out includes an evaluation of risks and opportunities related to the company's own operations as well as upstream and downstream the value chain, including the risks connected with its business relations, environment and the community in general.

The process of identification of the risks that can have financial effects takes into account the corporate risk map, which includes the risks related to financial management, tax risks, risk of business continuity and crisis management, among others.

#### **Determining financial materiality:**

Financial materiality is assessed based on a combination of likelihood of occurrence and potential magnitude of financial effects connected with the identified risks and opportunities.

$$\text{Materiality of impact assessment} = \text{Probability} \times \text{Magnitude of financial effects}$$

#### **Definition of thresholds of financial materiality:**

The **probability** evaluates the likelihood of occurrence of a risk or opportunity and is quantified from 0.2 to 1, of which 0.2 is the lowest probability and 1 means that the likelihood of occurrence is between 80% and 100%.

The **magnitude of financial effects** is evaluated according to the effects that a risk or opportunity could have on the income of the Group. It is quantified from 1 to 5, where 1 represents a low risk and consequences equivalent to less than 25% of the income of the Group, and 5 stands for a low risk and consequences equivalent to 85% of the Group's income.

#### **Definition of thresholds of materiality in sustainability sub-topics and topics**

The identified IROs are evaluated according to the thresholds defined above and the result is a quantitative score that enables comparability and prioritisation. The resulting scores of the IROs are grouped by sustainability sub-topic, and the average of impact materiality and financial materiality is calculated by sub-topic of the identified IROs. Likewise, the average of materiality of the sub-topics is calculated to obtain the score of materiality by sustainability topic.

The company considers as material the sustainability sub-topics which obtain at least 1.5 points in financial materiality and/or impact materiality assessment, the score in only one of the assessed dimensions being enough to be considered as material. Therefore, the material sustainability topics are those, which fall under the sub-topics identified as material by the company and the materiality is calculated according to the average of its sub-topics.

#### **Assessment and prioritisation of IROs and construction of the double materiality matrix**

The Sustainability Manager carries out an initial quantitative evaluation, which is reviewed by the managers of the different areas of the company. There are individual and specific meetings with the management to review the scores obtained of the IROs and to introduce changes if necessary.

Once the review has been completed by the management, the sustainability topics and sub-topics material to Audax are determined and presented to the Board of Directors for approval.

#### **Step 4: Presentation and approval of the conclusions of the double materiality assessment**

As a result of the assessment a list of sustainability topics and sub-topics material for the company is obtained as well as a list of material IROs.

The assessment carried out in 2024 led to considering as material thirteen (13) materiality sub-topics, grouped into five (5) sustainability topics, outlined in Appendix A (AR 16) of ESRS 1.

#### **Sustainability topics that are material to Audax Renovables**

Audax prepares this Non-Financial Information Statement in accordance with the results obtained in the double materiality assessment on sustainability sub-topics and topics of AR 16 and, as a consequence, addresses only the disclosure requirements specified in the CSRD Directive for each one of them:

ESRS	Sustainability topic	Sub-topic
E1	Climate change	Climate change adaptation
		Climate change mitigation
		Energy
E4	Biodiversity and ecosystems	Direct impact drivers of biodiversity loss
		Impact on the state of the species
S1	Own workforce	Working conditions
		Equal treatment and opportunities for all
		Other work-related rights
S4	Customers and end-users	Impacts related to the information for consumers and/or end users
		Social integration of consumers and/or end users
G1	Business conduct	Corruption and bribery
		Corporate culture
		Management of the relations with suppliers including payment practices

#### **Sustainability topics that are not material to Audax Renewables**

As a result of the double materiality assessment carried out the company arrived at the conclusion that the following sustainability topics are not material and provides information on the conclusions with regard to each topic.

ESRS	Sustainability topics that are not material
E2	Pollution
E3	Water and marine resources
E5	Circular economy
S2	Workers in the value chain
S3	Affected groups

##### **- Pollution (ESRS E2)**

Pollution is not a material issue for the company because the most important activity of the company and the greatest impact on pollution is the domestic use of the office space of the Group by the employees. The only production activity of the company is the generation of renewable energy in solar plants and wind farms. The installation of photovoltaic modules and wind turbines does not generate soil pollution in and of itself, but the company applies specific protective and mitigating measures to the waste of the power plants in order to avoid soil degradation and pollution. The company has not detected any case of soil pollution in 2024.

With regard to the sub-topics related to pollution it is important to indicate that Audax does not produce, nor does it use or sell substances considered to be of very high concern according to the REACH Regulation, or substances of concern or products containing them. No significant impacts or risks have been detected with respect to the use of plastic, primarily the use of packaging, which is sent to authorised waste managers for its recycling.

##### **- Water and marine resources (ESRS E3)**

Audax does not have any impacts or risks associated with the use of water and marine resources. The company does not carry out, directly or indirectly, spills or extractions of marine resources. The company and all its facilities consume tap water. The Group's offices use water at a domestic level because of the use of canteens and office space. In the power plants the use of water is mainly due to the cleaning of the solar panels, which is carried out at most once a year. The company monitors and reports annually the water consumed in the Group's offices and power plants. In 2024 the reported water consumption was of 381.5 m<sup>3</sup>.

- **Circular economy (ESRS E5)**

Circular economy has not proved to be material for the company, due to the time horizon considered for the formulation of this report and the useful life of the power plants.

The Group is aware of the great challenge faced by the wind farms and power plants with regard to recycling material and circular economy. The complex materials, the volume of the wind turbine blades, the limitations of recycling and reusing this kind of equipment - these are all challenges faced by the sector, and to which the industry is allocating multiple resources to develop technology capable of responding to these challenges.

The average life cycle of the power plants of the group is of 20 years, therefore this question will be material for Audax in the future. The first option that is being considered is the possibility of repowering the power plants to extend their useful life.

Currently the law requires that dismantling plans be drawn up and guarantees be provided to public agencies, which would be executed if Audax decided to evade responsibility at the end of the useful life of the power plants. The group follows the latest developments in technology and cooperates with companies dedicated to the development and innovation in this area, such as Vestas, a global leader in wind technology and the supplier of wind technology installed by the Group.

- **Workers in the value chain (ESRS S2)**

Workers in the value chain is not a material topic for the company because the Group does not have operating control over the workers in the value chain and there have been no incidents related to the working conditions or infringement of human rights of the employees in the value chain during 2024, nor during the whole history of Audax. The potential negative impacts identified are related to a potential situation in which the workers in the value chain do not receive fair or balanced working conditions. In such cases the company shall examine the situation and adopt appropriate measures, including reporting the situation and/or terminating the business relationship.

- **Affected groups (ESRS S3)**

With regard to the affected groups it is important to note that, despite the importance of this topic in the energy industry, Audax does not have any impact or risk related to violation of human rights in local communities where it is located and where its power plants and offices operate, therefore the topic is not material for the company. All the power plants and offices are located in Europe with the only exception of a wind farm in Panama. In this case, dialogue and community actions are carried out among local communities in Panama, and the company has contributed to the welfare of those communities, always being supported in its actions by, and cooperating with, the government.

In 2024 the Group has not identified any significant impacts or risks related to the civil and political, economic, social and cultural rights of the community groups or of the indigenous people.

#### **Disclosure requirements established in the ESRS covered by the company's Sustainability Statement (IRO-2)**

Section 5.5 List of requirements under Law 11/2018 on non-financial information and diversity and section 5.4 List of disclosure requirements of Appendix 5 feature a list of disclosure requirements met while drawing up the Sustainability Statement, as a result of double materiality assessment, indicating where the relevant information can be found in this report.

## a. ENVIRONMENTAL INFORMATION

### 2.1 Disclosure of information under article 8 of Regulation (EU) 2020/852 (the Taxonomy Regulation).

#### i. Introduction to the Taxonomy Regulation

The European Green Deal is an integral strategy of the European Union intended to achieve climate neutrality by 2050 by reducing to zero the greenhouse gas net emissions. This ambitious goal is meant to transform Europe into the first climate neutral continent by promoting a sustainable and inclusive development model, which allows to preserve the natural resources and to improve the quality of life of its citizens.

In order to meet this goal, the European Green Deal establishes three major lines of action:

1. To redirect the capital flows towards sustainable investments, ensuring that the economic growth should be aligned with the environmental sustainability principles.
2. To manage the financial risks resulting from global challenges, such as climate change, the loss of biodiversity and environmental degradation.
3. To foster transparency and a long-term vision in the financial and economic decisions, bolstering a resilient and socially responsible economy.

In this context, the EU Taxonomy is a key element to achieve the first goal of the Green Deal: to redirect the capital towards activities that would contribute significantly to the environmental sustainability.

Regulation (EU) 2020/852 (hereinafter, the Taxonomy Regulation) provides a regulatory framework that defines which economic activities can be considered environmentally sustainable. This classification system allows companies, investors and political leaders to rely on clear technical criteria that ensure coherence in the identification of activities aligned with the environmental goals of the EU.

The Taxonomy Regulation, in its Article 9, establishes environmental objectives to which an economic activity shall contribute in order to be considered as environmentally sustainable. These objectives are:



The activities that contribute substantially to these objectives and meet the technical criteria established in Delegated Acts are considered as sustainable:

- **Delegated Regulation (EU) 2021/2139** (hereinafter, Delegated Climate Act), published on 09 December 2021, outlined the activities related to the mitigation of and adaptation to the climate change.
- **Delegated Regulation (EU) 2022/1214** (hereinafter, Delegated Complementary Climate Act), published on 9 March 2022, added specific activities of nuclear energy and natural gas under strict conditions.
- **Delegated Regulation (EU) 2023/2485**, approved on 27 June 2023, extended and updated the technical criteria established in Delegated Regulation (EU) 2021/2139.
- **Delegated Regulation (EU) 2023/2486** (hereinafter, Environmental Delegated Act), approved on 27 June 2023, extended the Taxonomy by including activities related to non-climate objectives, such as water and biodiversity protection, pollution prevention or transition towards circular economy.

Thus, the EU Taxonomy not only contributes to fulfilling the European Green Deal but also strengthens the position of Europe as a global leader in sustainability and ecological transition.

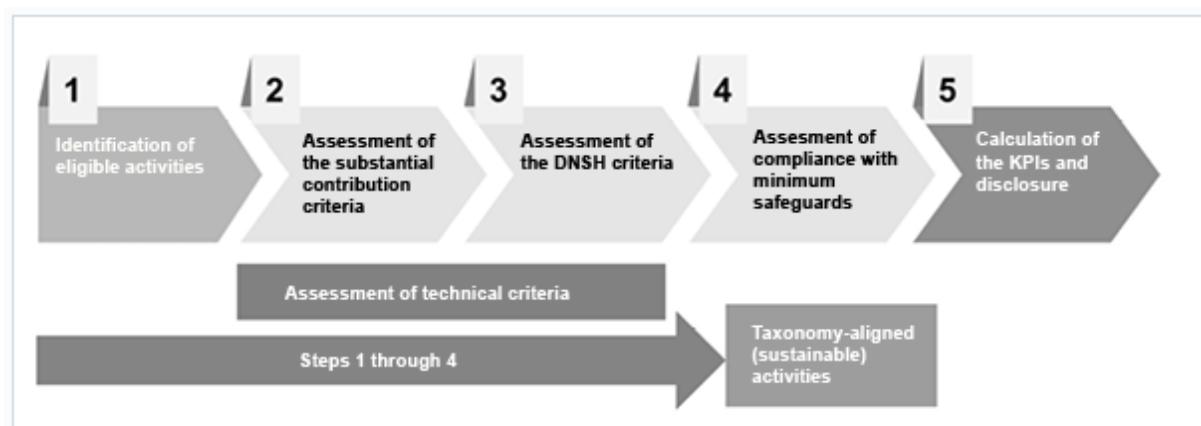
In this context, Audax Renovables has identified and disclosed taxonomy-eligible and taxonomy-aligned activities based on the information on the fiscal year 2024 of the six objectives outlined in the previous Delegated Acts, as well as various FAQs published by the European Commission between 2022 and 2024 related to the interpretation of the Delegated Regulation.

The Taxonomy Regulation also includes specific disclosure obligations intended to ensure transparency regarding the environmental impact. During the fiscal year 2021 the Group disclosed, according to simplified guidelines, the economic activities considered to be eligible under the Taxonomy, together with a set of key relevant performance indicators: income, capital expenses (CapEx) and operating expenses (OpEx) related to the Taxonomy. Since 01 January 2023 the Group has also been disclosing the part of these indicators corresponding to the activities aligned with the Taxonomy criteria, thus reinforcing its commitment to sustainability and the transparency according to the disclosure requirements established in **Delegated Regulation (EU) 2021/2178** (hereinafter, Delegated Act of article 8) and the subsequent amendments introduced in **Delegated Regulation (EU) 2023/2486**.

#### 1.4.1 Application of the Taxonomy Regulation in Audax Renovables

Audax Renovables has implemented a structural approach to evaluate the eligibility of its activities and, if applicable, their alignment with the Taxonomy Regulation. This procedure, supervised directly by the senior management, involves management areas of the Group and key teams that are in charge of the activities considered as eligible within their companies.

The main steps of this analysis are the following:



#### 2.1.3 Identification of eligible activities

According to the requirements established in article 1(5) of the Delegated Act of article 8, Audax Renovables identifies as eligible the economic activity included in the Climate Act, Complementary Climate Act or Environmental Act when it is described in these delegated acts, without it necessarily implying the fulfilment of the selection technical criteria.

In this regard, the eligibility indicate solely that the activity might contribute significantly to one of the six environmental objectives established by the Taxonomy, while the non-eligible activities are those that do not appear in neither of the Delegated Acts.

The determination of eligibility is an initial step that allows to proceed to the assessment of the alignment with the Taxonomy requirements.

#### List of activities carried out by Audax Renovables

Activity	Description of the activity
<b>Generation of energy from renewable sources</b>	The Group supports all kinds of activity connected with electricity generation from 100% renewable sources, primarily wind and solar energy. The Group runs a 1 GW portfolio of projects of electricity generation from renewable sources in wind farms and solar plants in Spain, France, Poland, Portugal, Italy and Panama.
<b>Electricity and natural gas retail</b>	The Group provides electricity and gas to businesses and individual clients through the retailing activity carried out in several European countries: Spain, Portugal, Italy, Germany, Poland, the Netherlands and Hungary.

Upon detailed analysis, Audax Renewables has identified the activities of **energy generation from renewable sources** as eligible.

Likewise, although they do not generate direct income to the Group, Audax Renewables also considers the **purchase and lease of light commercial vehicles** in its assessment of eligible activities.

These activities fall under the environmental objectives of climate change mitigation and adaptation, while no eligible activities related to the environmental non-climate objectives established in the Environmental Delegated Act were found.

#### List of taxonomy-eligible activities

Activity	Symbol	Description of the activity	Audax's activity
<b>Electricity generation through solar photovoltaic technology</b>	CCM 4.1	Construction or operation of installations of electricity generation through solar photovoltaic technology (FV).	Construction and operation of photovoltaic power plants
<b>Electricity generation from wind energy</b>	CCM 4.3	Construction or operation of installations of electricity generation from wind energy.	Construction and operation of wind farms
<b>Transport by motorbikes, passenger cars and light commercial vehicles</b>	CCM 6.5	Purchase, financing, lease and use of vehicles classified under categories M1 and N1, which fall under the scope of application of Regulation (EC) no. 715/2007 of the European Parliament and of the Council, or under the category L (two- and three-wheel vehicles and quadricycles).	Vehicles owned by the company
<b>Installation, maintenance and repair of instruments and devices for measurement and control of the energy efficiency in buildings</b>	CCM 7.5	Installation, maintenance and repair of instruments and devices for measurement, regulation and control of the energy efficiency in buildings (for example, smart gas, heat, cooling and electricity meters).	Installation of smart meters
<b>Installation, maintenance and repair of renewable energy technologies</b>	CCM 7.6	Installation, maintenance and repair of renewable energy technologies (for example, photovoltaic solar systems).	Installation of photovoltaic solar systems
<b>Conservation, including habitat restoration, of ecosystems and species</b>	BIO 1.1	Commencement, development and execution on own account or by commission or contract, of conservation activities, such as restoration activities intended to maintain or improve the conditions and the tendencies of the terrestrial, freshwater and marine habitats, of the ecosystems and the populations of species of wild fauna and flora related to them.	Measures to minimise the environmental impact of the renewable energy generation plants

On the other hand, the activities of the Group that are not eligible according to the Taxonomy include the retail of electricity and operations related to the supply of natural gas.

Audax Renewables stays alert to the updates of the Delegated Acts in order to ensure that its assessment reflects the regulatory changes and the development of opportunities in sustainable activities.

#### 2.1.4 Analysis of alignment of the activities with the Taxonomy

Upon identifying all the activities of the Group that are eligible under the Taxonomy (see table above), Audax Renewables proceeded to examine the criteria for a substantial contribution to the climate change mitigation, as well as the criteria for not causing significant harm to other environmental objectives.

This process has allowed to evaluate the alignment of the activities with the Taxonomy. Below we present a list of the activities that comply with the Taxonomy and we describe how they meet the necessary technical criteria.

This year the evaluation was centred on the objective of climate change mitigation, which currently is the most important objective for our activities.

**List of taxonomy-aligned activities:**

Eligible activity	Audax's activity	Alignment
<b>CCM 4.1 Electricity generation through solar photovoltaic technology</b>	Construction and operation of photovoltaic power plants	Yes
<b>CCM 4.3 Electricity generation from wind energy</b>	Construction and operation of wind farms	Yes
<b>CCM 6.5 Transport by motorbikes, passenger cars and light commercial vehicles</b>	Vehicles owned by the company	No
<b>CCM 7.5 Installation, maintenance and repair of instruments and devices for measurement and control of the energy efficiency in buildings.</b>	Installation of smart meters	No
<b>CCM 7.6 Installation, maintenance and repair of renewable energy technologies</b>	Installation of photovoltaic solar systems	No
<b>BIO 1.1 Conservation, including habitat restoration, of ecosystems and species</b>	Conservation measures (power plants)	No

**Activities that meet the selection technical criteria (substantial contribution and DNSH)**

**CCM 4.1 Electricity generation through solar photovoltaic technology**

Audax Renewables has **photovoltaic plants in different stages**, which produce and will produce energy of 100% renewable sources in Spain, Portugal and Italy. For more updated information concerning the photovoltaic generation portfolio see sections E1-5 and E1-6 of chapter 2.2 ESRS E1 - Climate change.

Moreover, this activity **does not cause significant harm** to other environmental objectives.

**Adaptation to climate change**

The information on adaptation to climate change can be found in section E1-1 Transition plan for the mitigation of climate change of chapter 2.2 ESRS E1 - Climate change of this report.

**Transition towards circular economy**

Audax Renewables implements the best available technologies while selecting solar photovoltaic plants or during the stage of construction planning, ensuring that these technologies persist throughout the life cycle of the project.

The waste produced in various stages of development of the solar photovoltaic farms, from construction to operation, is managed according to the local regulations on waste management.

**Protection and restoration of biodiversity and ecosystems**

In all the installations where it is legally required to carry out an Environmental Impact Assessment (EIA) we ensure that potential impacts on biodiversity and ecosystems are avoided. If it is not possible to avoid them, we implement measures to mitigate or eliminate those impacts in an adequate way.

**CCM 4.3 Electricity generation from wind energy**

Audax has **wind farms in operation**, which produce electricity of 100% origin in Spain, France, Poland and Panama. For more updated information concerning the wind generation portfolio see sections E1-5 and E1-6 of chapter 2.2 ESRS E1 - Climate change.

Moreover, this activity **does not cause significant harm** to other environmental objectives.

**Adaptation to climate change**

The information on adaptation to climate change can be found in section E1-1 Transition plan for the mitigation of climate change of chapter 2.2 ESRS E1 - Climate change of this report.

**Sustainability and protection of water and marine resources**

Does not apply to Audax, because all the wind farms are on-shore.

### **Transition towards circular economy**

Audax Renewables implements the best available technologies while selecting wind farms or during the stage of construction planning, ensuring that these technologies persist throughout the life cycle of the project.

The waste produced in various stages of development of the wind farms, from construction to operation, is managed according to the local regulations on waste management.

### **Protection and restoration of biodiversity and ecosystems**

In all the installations where it is legally required to carry out an Environmental Impact Assessment (EIA) we ensure that potential impacts on biodiversity and ecosystems are avoided. If it is not possible to avoid them, we implement measures to mitigate or eliminate those impacts in an adequate way.

### **Activities that do not meet some of the selection technical criteria (substantial contribution and / DNSH)**

#### **CCM 6.5 Transport by motorbikes, passenger cars and light commercial vehicles**

As at the end of 2024 Audax Renewables owns a total number of 5 (in terms of ownership or lease) vehicles of the M1/N1 category, classified as low or zero emission, belonging to the Audax Renewables Nederland B.V. company. Although the Group has hybrid vehicles (HEV), the activity 6.5 does not meet the substantial contribution criteria.

#### **Minimum safeguards**

We expect to align gradually this activity with the requirements established in the Taxonomy, along with the gradual migration of the Group's vehicle fleet.

#### **CCM 7.5 Installation, maintenance and repair of instruments and devices for measurement and control of the energy efficiency in buildings.**

During 2024 Audax Renewables has restructured its energy efficiency department in order to extend its services related to the climate change mitigation offered to the clients (for example, the installation of smart meters). Although the activities of this department are still in their initial stage, during 2024 Audax Renewables already began to install smart meters (intended to measure and control the energy efficiency and, consequently, reduce emissions).

#### **CCM 7.6 Installation, maintenance and repair of renewable energy technologies**

During 2024 Audax Renewables has restructured its energy efficiency department in order to extend its services related to the climate change mitigation offered to the clients (for example, the installation of solar photovoltaic systems). Although the activities of this department are still in their initial stage, during 2024 Audax Renewables already began to install solar photovoltaic systems.

#### **BIO 1.1 Conservation, including habitat restoration, of ecosystems and species**

In all the installations where it is legally required to carry out an Environmental Impact Assessment (EIA) we ensure that potential impacts on biodiversity and ecosystems are avoided. If it is not possible to avoid them, we implement measures to mitigate or eliminate those impacts in an adequate way.

#### **Minimum safeguards**

The minimum social safeguards include all the procedures implemented in the company in order to ensure that the activities are carried out in accordance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on business and Human Rights, including the principles and rights established in the fundamental conventions referred to by the International Labour Organisation Declaration on fundamental principles and rights at work and the International Charter of Human Rights (article 18 of Regulation 2020/852).

In order to assess the fulfilment of the minimum social safeguards, and taking as a reference the '*Final Report on Minimum Safeguards*' published by the European Commission in October 2022, Audax Renewables has analysed the following four dimensions: human rights, corruption and bribery, taxation and fair competition, as specified below:

## **Human Rights**

Audax Renovables stays firmly committed to the defence of human rights in accordance with the Ten Principles of the UN Global Compact, to which the company continues adhered since 2013.

Likewise, the Code of Ethics of Audax Renovables conveys a firm commitment to human rights and civil liberties recognised by national and international agreements and legal systems of the countries where it operates. In particular, the Code of Ethics specifically expresses the Group's commitment to human rights and labour rights, equal opportunities, diversity and non-discrimination, the right to privacy, harassment prevention, reconciliation of personal and professional life, health and safety of the employees, the commitment to and protection of the environment, commitment to training and development and the promotion of open and fluid communication between employees.

Moreover, it establishes that the principles of conduct of the Group mean compliance with the law and with the corporate governance system, and integrity.

Lastly, the company has never been declared guilty of infringement of labour rights or human rights.

## **Corruption and bribery**

Audax has established robust anti-corruption processes. Specifically, it has implemented a code of ethics and a policy against corruption and bribery, whose object is "*to address the necessary compliance with the legal requirements concerning anti-corruption principles, management of the risk derived from any kind of corrupt business practice or any operation contrary to the good practice, in any of its forms, and to implement, among others, principle no. 10 of the UN Global Compact, established as one of the values within Audax Renovables, S.A.*".

This policy, applicable to the Audax Group (including all the directors, managers and employees of the Group), clearly defines the prohibited conducts and the allowed conducts, establishing rules of conduct with regard to accepting or offering gifts or invitations, thus prohibiting any kind of bribery, all of which in compliance with the Gifts and Hospitality Policy.

Lastly, it should be mentioned that neither the companies of the Group nor any members of its senior management have been convicted by the courts for corruption.

## **Taxation**

Audax Renovables has drawn up guidelines for accounting policies, which define the accounting principles and criteria of the companies of the Group, as well as a general risk control and management policy, which identifies the risk related to regulatory changes (among others, those related to taxation). All these documents, being an important element of supervision for Audax, are presented to and approved by the Board of Directors. Moreover, Audax has formulated a corporate risk map, which includes possible tax risks.

Lastly, it should be mentioned that none of the companies of the Group has been convicted for non-compliance with the tax law.

## **Fair competition**

In its Code of Ethics the Group expressly makes a commitment to compete fairly and with respect to the rights of others in the different markets where it operates, complying with the applicable laws at all times and in all geographical locations, in particular with regard to the rules of competition, be it in the local, national or international context.

This general principle includes respect to legitimate business that the Group's competitors may develop with potential clients of the Group. It thus indicates that all kind of comments or behaviour that could be dishonest towards the competitors should be avoided.

In order to ensure prevention of any breach of fair competition principles, Audax Renovables carries out special awareness-raising actions related to the code of ethics, directed to its employees as well as its managers.

Lastly, neither the companies of the Group nor their managers have been convicted by courts for any breach of the fair competition regulations.

## 2.1.5 Accounting policy

The accounting policy followed by Audax Renovables in the calculation of the key performance indicators (hereinafter, KPI) that should be disclosed under the EU Taxonomy Regulation is based on the criteria established in the Delegated Act of article 8 and its subsequent amendments, as well as on the different FAQs published by the European Commission between 2022 and 2024 concerning the interpretation of the Delegated Regulation.

Any assumptions or estimates used for the calculation of the KPIs shall be outlined in this chapter. These estimates or assumptions can be modified and disclosed in the future when necessary according to future official guidelines of the European Commission or the best practices of the industry.

The KPIs that are eligible and aligned with the Taxonomy are calculated as the KPIs associated to each specific eligible activity aligned with the Taxonomy and are divided between the total KPIs of the Group. While calculating the numerators, the KPIs were assigned to the eligible activities aligned with the Taxonomy depending on the eligibility and alignment assessment described in the previous section of this chapter.

The income KPI is directly linked to the ratios used in the consolidated financial statements of the Group, while those of CapEx and OpEx of the Taxonomy refer to the kind of expenses or additions required by the EU Taxonomy Regulation.

For the consolidated figures of the EU Taxonomy, the consolidation adjustments are made primarily in accordance with the principles used in the consolidated financial statements.

### **Double accounting**

All the disclosed KPIs of the Taxonomy exclude double accounting, because each KPI is assigned to a different activity, which is independent, in order to divide the financial figures among the applicable activities.

Audax Renovables considers that all its economic activities eligible under the Taxonomy contribute to the mitigation of the climate change, therefore they are disclosed only under this objective.

### **Calculation of the income KPI**

According to the definition in the Delegated Act of article 8, the proportion of income of the Group that is eligible and aligned with the Taxonomy is calculated as income derived from products or services associated with the eligible and Taxonomy-aligned economic activities, divided into the total income of the Group disclosed in the Group's financial statements.<sup>1</sup>

The activities: **CCM 6.5 Transport by motorbikes, passenger cars and light commercial vehicles** and **BIO 1.1 Conservation, including habitat restoration, of ecosystems and species**, eligible but not aligned, do not generate income.

In this regard, on the one hand, the income related to the activity **CCM 4.1. Electricity generation through solar photovoltaic technology** includes the total revenue associated to the power plants of Cañamares (Davinci Energía, S.L.U.), Carolinas 1 and 2 (Las Piedras Solar, S.L.U.), Zarzuela 1, 2, 3 and 4 (Corot Energía, S.L.U.), Alberizas 1, 2, 3 and 4 (Corot Energía, S.L.U.), Toconal (Centauro Energía Solar, S.L.), Calañas (Elogia Calañas), Los Arenales (Corinto Solar, S.L.U.), La Miranda (Ulises Power, S.L.), Zaratán 1 and 2 (Zurván Gestión de Proyectos), Cuatro Caminos 1 (Zeus Power, S.L.), Cuatro Caminos 2 (Hera Power, S.L.), Cuatro Caminos 3 (Juno Power, S.L.) and Cuatro Caminos 4 (Diana Power, S.L.), El Rebollo (Atlas Power, S.L.) and Lucero (Solar Buaya Inversiones, S.L.U.); while the income linked to the activity **CCM 4.3. Electricity generation from wind energy** includes the total revenue associated to the power plants of Eólica Pedregoso A, B and C (Eólica El Pedregoso, S.L. and Eólica Del Pino, S.L.), Postolin (Eólica Postolin Sp Z.o.o) and Beausembant (Eoliennes De Beausembant, S.A.S). In order to calculate this income, the individual turnover of each generation company (of renewable electricity) of the group has been taken into account and consolidation adjustments have been made (thus avoiding the double accounting of the income, because the generation companies of Audax Renovables sell renewable electricity to the companies of Audax which, in turn, retail it to the market). Audax considers that, in order to offer a more precise representation of the alignment of its operations with the Taxonomy of sustainable activities of the European Union, the calculation of the income ratio shall include the turnover of the renewable generation business.

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<sup>1</sup> The total income of the Group disclosed in its financial statements differs from the KPI because it does not take into consideration the inventories, only the Net Turnover.

Following the criteria established in the Delegated Act of article 8, the wind farm of Toabré (Parque Eólico Toabré, S.A.), in which Audax holds a 30% share, has not been included in this calculation.

On the other hand, the income associated to the activity **CCM 7.5 Installation, maintenance and repair of instruments and devices for measurement and control of the energy efficiency in buildings** includes the revenue from the installation of smart meters, and the income associated to the activity **CCM 7.6 Installation, maintenance and repair of renewable energy technologies** includes the revenue from the installation of photovoltaic solar systems.

#### **Calculation of the CapEx KPI**

According to the definition of the Delegated Act of article 8, the proportion of CapEx of the Group which is eligible and aligned with the Taxonomy is calculated as the proportion of CapEx connected with the asset or processes linked to the eligible activities aligned with the Taxonomy to the total CapEx of the Group, calculated as the additions of tangible and intangible assets during the year considered before depreciation, amortisation and possible new measurements, including those resulting from revaluations and impairment, corresponding to the relevant fiscal year, excluding changes in fair value, including likewise the additions to tangible and intangible assets that result from business combinations.

The calculation is carried out based on the following standards: IAS 16 Property, plant and equipment, paragraphs 73,(e)(i) and (iii), IAS 38 Intangible assets, paragraph 118,(e)(i), IAS 40 Property investments, paragraph 76a) and b) (for the fair value model), IAS 40 Property investments, paragraph 79d)(i) and (ii) (for the cost model), IAS 41 Agriculture, paragraph 50b) and e) and IFRS 16 Lease, paragraph 53h)<sup>2</sup>.

The same procedure is followed in the calculation of the CapEx KPI of the eligible activities that are not aligned.

In this regard, the CapEx related to the activity **CCM 4.1. Electricity generation through solar photovoltaic technology** includes the total CapEx associated to the power plants of Cañamares (Davinci Energía, S.L.U.), Carolinas 1 and 2 (Las Piedras Solar, S.L.U.), Zarzuela 1, 2, 3 and 4 (Corot Energía, S.L.U.), Alberizas 1, 2, 3 and 4 (Corot Energía, S.L.U.), Toconal (Centauro Energía Solar, S.L.), Calañas (Elogia Calañas), Los Arenales (Corinto Solar, S.L.U.), La Miranda (Ulises Power, S.L.), Zaratán 1 and 2 (Zurván Gestión de Proyectos), Cuatro Caminos 1 (Zeus Power, S.L.), Cuatro Caminos 2 (Hera Power, S.L.), Cuatro Caminos 3 (Juno Power, S.L.) and Cuatro Caminos 4 (Diana Power, S.L.), El Rebollo (Atlas Power, S.L.) and Lucero (Solar Buaya Inversiones, S.L.U.); while the CapEx linked to the activity **CCM 4.3. Electricity generation from wind energy** includes the total CapEx associated to the power plants of Eólica Pedregoso A, B and C (Eólica El Pedregoso, S.L. and Eólica Del Pino, S.L), Postolin (Eólica Postolin Sp Z.o.o) and Beausemblant (Eoliennes De Beausemblant, S.A.S).

Following the criteria established in the Delegated Act of article 8, the wind farm of Toabré (Parque Eólico Toabré, S.A.), in which Audax holds a 30% share, has not been included in this calculation.

With regard to the activity **CCM 6.5 Transport by motorbikes, passenger cars and light commercial vehicles**, eligible but not aligned, the total CapEx associated to the purchase and/or lease (which would involve registering a right-of-use asset under IFRS 16) of the following companies has been included: Audax Renovables, S.A., Unieléctrica Energía, S.A., Audax Renewables K.F.T, Audax Gas Trading K.F.T, Audax Renewables Nederland B.V., Audax Energie, GmbH, Audax Sucursal (Portugal), Audax Renewables Polska sp. z o.o. and Audax Energía S.R.L.

Lastly, it should be mentioned that the Audax Group has not had any additions to CapEx related to the activities **CCM 7.5 Installation, maintenance and repair of instruments and devices for measurement and control of the energy efficiency in buildings, CCM 7.6 Installation, maintenance and repair of renewable energy technologies or BIO 1.1 Conservation, including habitat restoration, of ecosystems and species**.

#### **Calculation of the OpEx KPI**

According to the definition in the Delegated Act of article 8, the proportion of OpEx of the Group that is eligible and aligned with the Taxonomy is calculated as OpEx related to assets or processes associated with the eligible and Taxonomy-aligned economic activities, in proportion to the total OpEx of the Group according to the Taxonomy.

In this context, the numerator of the Taxonomy OpEx includes non-capitalised direct costs related to the investigation and development, building renovation measures, short-term lease, maintenance and repairs, as

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<sup>2</sup>A lease which does not involve registering a right-of-use asset is not accounted for as CapEx.

well as other direct expenses related to the daily maintenance of the fixed assets of the company or of a third party commissioned to perform the activities, and which are necessary to ensure the continuing and efficient functioning of these assets.

The same procedure is followed in the calculation of the OpEx KPI of the eligible activities that are not aligned.

In this regard, the OpEx related to the activity **CCM 4.1. Electricity generation through solar photovoltaic technology** includes the total OpEx associated to the power plants of Cañamares (Davinci Energía, S.L.U.), Carolinas 1 and 2 (Las Piedras Solar, S.L.U.), Zarzuela 1, 2, 3 and 4 (Corot Energía, S.L.U.), Alberizas 1, 2, 3 and 4 (Corot Energía, S.L.U.), Toconal (Centauro Energía Solar, S.L.), Calañas (Elogia Calañas), Los Arenales (Corinto Solar, S.L.U.), La Miranda (Ulises Power, S.L.), Zaratán 1 and 2 (Zurván Gestión de Proyectos), Cuatro Caminos 1 (Zeus Power, S.L.), Cuatro Caminos 2 (Hera Power, S.L.), Cuatro Caminos 3 (Juno Power, S.L.) and Cuatro Caminos 4 (Diana Power, S.L.), El Rebollo (Atlas Power, S.L.) and Lucero (Solar Buaya Inversiones, S.L.U.); while the OpEx linked to the activity **CCM 4.3. Electricity generation from wind energy** includes the total OpEx associated to the power plants of Eólica Pedregoso A, B and C (Eólica El Pedregoso, S.L. and Eólica Del Pino, S.L), Postolin (Eólica Postolin Sp Z.o.o) and Beausemblant (Eoliennes De Beausemblant, S.A.S).

**Following the criteria established in the Delegated Act of article 8, the wind farm of Toabré (Parque Eólico Toabré, S.A.), in which Audax holds a 30% share, has not been included in this calculation.**

**With regard to the activity BIO 1.1 Conservation, including habitat restoration, of ecosystems and species, although Audax Renovables did have operating expenses (Taxonomy OpEx), currently it is working on updating its systems in order to include this information and disclose it in the next year report.**

**Lastly, Audax Renovables does not have (Taxonomy) OpEx associated with the activity CCM 6.5 Transport by motorbikes, passenger cars and light commercial vehicles, because the entirety of the cost has been capitalised (IFRS adjustment).**

**Neither does Audax Renovables have (Taxonomy) OpEx related to the activity CCM 7.5 Installation, maintenance and repair of instruments and devices for measurement and control of the energy efficiency in buildings, nor to the activity CCM 7.6 Installation, maintenance and repair of renewable energy technologies.**

## 2.2 Climate change (ESRS E1)

### Objective

The objective of this chapter is to provide the information necessary to understand how the activities of Audax Renovables affect the climate change in terms of material impacts, risks and opportunities.

### Interaction with other ESRS

This chapter shall be read in connection with ESRS 2. General information.

### Disclosure requirements

The fight against the climate change and the commitment to the energy transition are two of the main challenges addressed by the Group in the area of sustainability. The company is changing the way of producing, distributing and consuming energy, and the regulators are promoting policies of climate neutrality, which prioritise renewable energy consumption over fossil fuels as a pathway to decarbonisation. Fossil fuels and all the activities related to them are one of the main causes of the climate change, and renewable sources constitute the main factor for the transition towards low-carbon economy.

The energy transition is a challenge, but also an opportunity to improve the state of the planet and people's health, to create quality jobs and to generate wealth in a more sustainable way. Therefore, in 2019 Audax Renovables extended its focus to the generation of 100% renewable energy in order to provide the company with a portfolio of photovoltaic projects, which demonstrates the company's strong commitment to the sustainability and renewable energy.

### SBM-3 Material impacts, risks and opportunities and their interaction with the strategy and business model

The climate change has become a material subject to Audax as a consequence of its activities of both retail and generation of energy. The conclusions of the double materiality assessment carried out according to ESRS E1 on climate change establish as material the following topics and sub-topics of sustainability due to the material IROs identified by the company as part of its double materiality assessment.

ESRS	Topic	Sub-topic	Impact, Risk or Opportunity	IRO
E1	Climate change	Climate change mitigation	Impact	Direct and indirect emission of greenhouse gas by the activity of retail of natural gas and of electricity from renewable sources
			Impact	Purchase of guarantees of origin (GOs).
			Opportunity	Definition of a decarbonisation goal at the Group level
			Risk	Changes in the customer demand for green energy.
	Climate change adaptation	Climate change adaptation	Risk	Risk of not achieving the goal to reduce the global warming to 1.5°C and that the energy transition will not advance as expected.
			Risk	Possible climate risks of transition related to the retail of gas.
	Energy	Energy	Impact	Promotion of technological innovation and development in the sector of renewable energy through the implementation of energy storage technology.
			Impact	Promotion of renewable energy to reduce the dependence on fossil fuels.
			Impact	Fair pricing of the energy invoice to improve the customer experience.
			Impact	Implementing technology solutions to improve the energy efficiency and reduce the cost of energy for the end client.
			Risk	Energy price volatility.
			Risk	Risk of decrease of demand for renewable energy and/or GOs because of an increase of cost in the client invoice.
			Risk	Inadequate management of the purchase/sale of energy (electricity and gas) and GOs.
			Risk	Political instability and global geopolitical conflicts that may affect the changes in the price of and demand for energy.

With regard to each climate-related identified risk the company informs whether it considers it a climate-related physical risk or a climate transition risk:

Impact, Risk or Opportunity	IRO	Physical risk / Transition risk
Risk	Changes in the customer demand for green energy.	Transition risk
Risk	Risk of not achieving the goal to reduce the global warming to 1.5°C and that the energy transition will not advance as expected.	Transition risk
Risk	Possible climate risks of transition related to the retail of gas.	Transition risk
Risk	Energy price volatility.	Transition risk
Risk	Risk of decrease of demand for renewable energy and/or GOs because of an increase of cost in the client invoice.	Transition risk
Risk	Inadequate management of the purchase/sale of energy (electricity and gas) and GOs.	Transition risk
Risk	Political instability and global geopolitical conflicts that may affect the changes in the price of and demand for energy.	Transition risk

The company has not conducted an analysis of resilience of its strategy and its business model as such, but did carry out an analysis of climate risks derived from climate change, applied to the generation assets.

The analysis was based on the physical risk detection tool applied to each asset. Two scenarios were analysed: a scenario of low greenhouse gas (GHG) emissions (SSP1-2.6) and a scenario of high GHG emissions (SSP5-8.5), under three timelines (base line, 2030 and 2050). 8 different extreme climate and meteorological threats have been analysed, which could harm the assets of the company, affect the biodiversity and the ecosystems and have a financial impact on the assets of Audax. The following threats have been considered: extreme heat, forest fires, floods, droughts, rains and cyclones, extreme cold and landslides.

The results obtained from the application of the tool indicate that the total risk level, considering all the threats, is similar in almost all the assets due to the similarities of the installations, and is "Low" or "Minimal" in great majority. With the exception of the photovoltaic plant located in the region of Toledo in Spain, which is the only asset, whose risk is "Moderate" in a scenario of high emissions in 2050, due to the extreme heat in the region and possible loss of efficiency resulting from it.

All the photovoltaic plants face the risk of extreme heat in at least one of the climate scenarios and timelines. Even though they are designed to withstand high temperatures, a significant increase of temperature may affect their efficiency and electronic parts, conditioning the operation of the power plants.

All the solar plants face a risk classified as "High" related to water stress and drought, in both timelines. The reduction of water consumption for the panel cleaning procedures is one of the measures the Company is currently taking into account. Lastly, in a scenario of high emissions in 2050, the analysis has shown that there are two assets with a high exposure to the risk of fire damage. Specifically it concerns a photovoltaic farm in Spain and a wind farm in France.

The Group has defined a series of adapting measures for each of the identified climate threats. These adapting measures include, among others, the improvement of the fire prevention systems, installation of rainwater harvesting systems for the purpose of cleaning the modules, or installation of cooling systems in order to improve the efficiency of the panels.

#### **Integration of sustainability-related performance into the incentive schemes (GOV-3)**

The Group has introduced a decarbonisation objective into its Long-Term Incentive Plan of the Audax Group intended for the key managers and employees. The main object of the Plan is to incentivise, motivate and retain the management team and the key employees by offering them an incentive linked to the performance of the strategic plan.

The Plan consists in assigning to each beneficiary at the beginning of the Plan a number of "Units", which will give them the right to a number of shares of Audax equivalent to the assigned units weighted by a determined percentage depending on the degree of fulfilment of the specified goals. The Plan is linked, among others, to the fulfilment of a decarbonisation-related goal. Specifically, 3.3% is assigned to the fulfilment of the first decarbonisation goal of the Group by 203, whose approval is expected in 2025.

The Plan is supervised by the Chairman of the Board of Directors and the general manager of Audax, according to the instructions of the Board of Directors and the terms and conditions of the incentive are regulated in the document Long-Term Incentive Plan of the Audax Group, 2024-2026.

#### **Transition plan for climate change mitigation (E1-1)**

Audax Renovables is a company primarily involved in rendering services, except for the activity of renewable energy generation through wind and solar farms. In 2024 the company calculated for the first time the 3 scopes of carbon footprint, revealing that the most significant CO<sub>2</sub> emissions of the company are those related to scope 3, as they represent more than 99% of the total emissions of the Group.

Those emissions correspond to the transport and distribution of electricity and natural gas, which in terms of decarbonisation translates into a greater complexity, because Audax does not have operating control nor power of influence over its upstream and downstream value chain.

At the close of the year the Group does not have a transition plan for the climate change mitigation, which would ensure that its strategy and business model are compatible with the transition towards sustainable economy and reduce the global warming to 1.5 degree Celsius, in line with the Paris Agreement. However, the Group has worked throughout 2024, and will continue working in 2025, on the definition of the first decarbonisation goal of the Group, as a part of its Sustainability Strategic Plan 2023-2023.

The definition of the decarbonisation goal will focus on the retail of electricity of renewable origin activity through the purchase of guarantees of origin and will be established for the period of 2025-2030. The group is working on the definition of the goal as well as a plan to achieve it. The Board of Directors is expected to approve the decarbonisation goal in 2025.

The company is not exempted from the EU Paris-aligned Benchmarks. It agrees with the exemption criteria established in Article 12.1(d) to (g) and 12.2 of Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmarks Regulation).

#### **Policies related to climate change mitigation and adaptation (E1-2)**

The company does not have specific policies on climate change mitigation and adaptation, but does have an Environmental Policy applicable to all the subsidiaries and all the activities, which includes as a part of its commitment to the environment the fight against climate change and the contribution to the decarbonisation of the economy in general. The policy was approved by the Board of Directors in 2023.

#### **Actions and resources in relation to climate change policies (E1-3)**

The company has not established decarbonisation levers yet, but they will be developed in 2025. Considering that the activity of Audax is centred on the retail and generation of renewable energy, the company has implemented specific measures in order to extend its generation capacity and optimise the use of financial resources allocated to the energy transition.

Currently Audax Renovables develops, constructs and operates renewable energy installations with a portfolio of renewable energy generation projects in various European markets. Its investments in energy generation have been financed primarily with own resources, accumulating approximately €200 million since the year 2020. Thus in 2024 the investment in renewable energy generation plants of Audax has reached €49.5 million, as shown in section 5.3 Taxonomy indicators. These investments are designed to strengthen the company's role as independent producer of renewable energy and to contribute to the reduction of emissions in the energy sector.

In 2024 Audax Renovables produced a total of 305 GWh of energy generated from 100% renewable sources.

Source	Installed capacity [MW]	Energy production [GWh]
Wind	157	161
Solar	110	144

Complementarily to the generation activity, the Group retails electricity and natural gas, supplying energy to businesses and households in various countries across Europe, including Spain, Portugal, Italy, Germany, Poland, the Netherlands and Hungary.

Moreover, in order to support its sustainable growth strategy, the company has established a Reference Regulatory Framework for the Green Finance, aligned with the international principles of sustainable bonds. Through this framework, the company has carried out issues of green bonds to finance projects of renewable energy generation.

In the future the company will continue expanding its renewable generation capacity and optimising its financial structure to support energy transition.

#### **Targets related to climate change mitigation and adaptation (E1-4)**

As a part of its Sustainability Strategic Plan 2023-2025 the company has been defining its first decarbonisation goal, whose approval is expected in 2025, and which will be centred around its main activity, the energy retail. At the close of the year 2024 the company does not have targets related to climate change.

As a part of the supervision of the identified IROs in climate change topics, the company monitors its carbon footprint after establishing its baseline in 2023, and oversees its energy consumption disclosed in the disclosure requirements E1-5 and E1-6 included below.

## Energy and emissions (E1-5; E1-6)

### Energy consumption and energy mix

The energy consumption of the Group is mainly related to its corporate facilities, including the headquarters and the subsidiaries, and the operations of its 100% renewable energy generation plants, in addition to the consumption related to its vehicle fleet.

#### Energy consumption in facilities

Audax operates through various facilities, which include renewable energy generation plants and headquarter and subsidiary offices. The main energy consumption is in the electricity plants, where the sources with renewable origin guarantees prevail.

#### Offices

The reported consumption of energy is limited to the offices under operational control, using the same scope of report for the scopes 1 and 2 of carbon footprint.

Additionally to the consumption of electricity, in the office in Hungary (without operational control) the demand for thermal energy is satisfied by systems of "district heating", optimising the use of local sources of energy.

#### *Energy generation facilities*

The energy generation facilities of Audax Renovables use exclusively renewable sources, meeting the central goal of carbon footprint reduction of the Group.

#### Energy consumption in the vehicle fleet

The own vehicle fleet represents other significant source of energy consumption. The majority of the Group's companies have gathered primary data on consumption of different fuels (E5, E10 and B7).

Energy consumption and mix (MWh)	2024
(1) Consumption of fuel from coal and coal products	-
(2) Consumption of fuel from crude oil and petroleum products	1,157.2
(3) Consumption of fuel from natural gas	-
(4) Consumption of fuel from other fossil sources	-
Consumption of purchased or acquired electricity, heat, steam or cooling from fossil sources	69.0
(6) Total energy consumption from fossil sources	1,226.2
<b>Proportion of fossil sources in total energy consumption (%)</b>	<b>36%</b>
(7) Consumption of fuel from nuclear sources	0.3
<b>Proportion of nuclear sources in total energy consumption (%)</b>	<b>0%</b>
(8) Consumption of fuel from renewable source, such as biomass (also comprising industrial and municipal waste of biologic origin, biogas, hydrogen from renewable sources, etc.)	93.7
(9) Consumption of purchased or acquired electricity, heat, steam or cooling from renewable sources	2,098.0
(10) Consumption of self-generated non-fuel renewable energy	-
(11) Total renewable energy consumption	2,191.7
<b>Proportion of renewable sources in total energy consumption (%)</b>	<b>64%</b>
<b>Total energy consumption</b>	<b>3,418.3</b>

The sector in which the Group operates is considered as a high climate impact sector under Delegated Regulation (EU) 2022/1288.

<b>Energy intensity based on revenue (MWh/€)</b>	<b>2024</b>
Total energy consumption from activities in sectors of high climate impact by revenue from activities in sectors of high climate impact	0.00
The following table shows the reconciliation of the reported denominator with the note on net revenue from activities in sectors of high climate impact in the financial statements:	
<b>Revenue (EUR million)</b>	<b>2024</b>
Revenue from activities in sectors of high climate impact	1,981.7
Other income	-
<b>Total revenue (financial statements)</b>	<b>1,981.7</b>

#### Methodologies applied and calculation limitations

Energy consumption is not included with regard to the offices without direct operational control, such as leased offices under operational control of the lessee. This consumption falls within scope 3, category "downstream leased assets" according to the guidelines of GHG Protocol.

The electricity consumed with guarantee of origin is considered entirely renewable. In order to calculate the consumption of electricity without guarantee of origin the retailer applies a percentage of renewable energy of the mix remaining after the guarantees are redeemed, using the national residual energy mix as the ultimate benchmark.

With regard to the vehicle consumption of Portugal, where the direct consumption information is not available, the consumption has been estimated by calculation based on the cost of fuel and the corresponding conversion factors for each type of fuel. Consequently, the information on the energy consumption of the vehicle fleet of the Group has been obtained from direct registers of fuel supply complemented by calculation models based on expenses in specific companies, such as in the case of Portugal.

Moreover, because the fuel consumed contain a percentage of renewable fuels in compliance with applicable European regulations, the proportion of bioethanol in E5 and E10 fuels as well as the proportion of biodiesel in B7 fuel have been calculated as renewable energy consumption. The remaining volume of fuel consumed is considered fossil fuel.

In 2024 the estimation is of 1.5% of the total energy consumption.

#### **Generation and retail of energy**

Audax Renewables manages a diverse and robust portfolio of energy generation projects strategically focused on renewable sources. The total installed capacity is of 955 MW, distributed in wind farms and solar plants located in Spain, France, Poland, Portugal, Italy and Panama.

In 2024 the Group supplied a total of 15.5 TWh of energy. 11% of the energy supplied is certified as renewable, ensuring that its client base have access to more sustainable options aligned with the global energy transition.

#### **Gross GHG emissions of scope 1, 2 and 3 and total GHG emissions**

In 2024 the Group conducted an integral assessment of its carbon footprint, implementing for the first time an exhaustive study of the Scope 3 emissions. Using the methodology of the GHG Protocol the Group included emissions of the gas and electricity it sells, thus enabling transparent management and reporting of its emissions available to the interested parties.

The Group's carbon footprint for the year 2023, the first under the requirements of ESRS E1-6, is of 3,430,874 tCO<sub>2</sub>eq, calculated according to the market-oriented approach. A detailed analysis reveals that Scope 3 emissions are the major part of Audax's total carbon footprint, at almost 100% of total emissions.

Taking 2023 as the baseline year, the company pledges to continue a continuous improvement route, using innovative technologies and improved practices to achieve significant reductions of its carbon footprint.

Inventory of emissions for 1, 2 and 3 scopes (tCO <sub>2</sub> e)	Development		
	2023	2024	% 2024/2023
<b>GHG emissions scope 1</b>			
Gross GHG emissions scope 1	423.5	307.6	(27.4)%
Gross GHG emissions of scope 1 from regulated systems of emissions trading (%)	-	-	-
<b>GHG emissions scope 2</b>			
Gross GHG emissions of scope 2 based on location	515.0	316.7	-38.5%
Gross GHG emissions of scope 2 based on market	239.0	42.6	-82.2%
<b>Total indirect gross GHG emissions (scope 3)</b>	<b>3,429,679.5</b>	<b>3,655,119.8</b>	<b>6.6%</b>
1 Goods and services purchased	126,187.5	156,056.3	23.7%
2 Capital goods	8,606.7	8,413.5	-2.2%
3 Activities related to fuels and energy (not included in scopes 1 or 2)	2,560,522.4	2,589,346.4	1.1%
4 Upstream transportation and distribution	-	-	-
5 Waste generated in operations	4.3	4.2	-2.3%
6 Business travels	111.8	281.3	151.6%
7 Employee commuting	939.6	835.3	-11.1%
8 Upstream leased assets	30.2	50.2	66.2%
9 Transportation and distribution	-	-	-
10 Processing of sold products	-	-	-
11 Use of sold products	733,257.4	900,111.6	22.8%
12 End-of-life treatment of sold products	-	-	-
13 Downstream leased assets	-	-	-
14 Franchise	-	-	-
15 Investments	19.7	21.0	6.6%
<b>Total GHG emissions</b>			
Total GHG emissions (based on location)	3,431,151.9	3,655,744.1	6.5%
Total GHG emissions (based on market)	3,430,207.1	3,655,470.0	6.6%

The following table shows the intensity of GHG emissions (total GHG emissions by net income):

GHG intensity by revenue (tCO <sub>2</sub> e/€)	2024
Total GHG emissions (based on location) by revenue	0.002
Total GHG emissions (based on market) by revenue	0.002

The following table shows the reconciliation of the reported denominator with the note on net revenue in the financial statements:

Revenue (EUR million)	2024
Revenue from activities in sectors of high climate impact	1,981.7
Other income	-
<b>Total revenue (financial statements)</b>	<b>1,981.7</b>

### **Definition of the base year**

The base year is 2023, with data that cover the Group's activities from 1 January 2023 to 31 December 2023. That year was selected as base year because it is representative of the current activities of the Group and was the most recent complete year when the Group completed the process of footprint development.

### **Organisational limits**

In its footprint calculation the Group used an operational control approach, including the emissions where it has full power to introduce and implement its operating policies in the operation.

#### **Corporate**

This function comprises all the activities in its offices, including administrative tasks and support services which contribute to the total operational footprint of the Group.

#### **Retail**

This segment includes the acquisition and sale of gas and electricity retailed by the Group. It implies the management of the supply chain, interactions with clients and market transactions, fundamental for the assessment of the Group's carbon footprint.

#### **Generation**

This function covers operations of renewable electricity generation of the Group. It includes all the assets related to the wind and solar photovoltaic energy production, reflecting the Audax Group's commitment to sustainable energy.

In this regard, the inventory of the Group's emissions includes direct and indirect GHG emissions originated in the consolidated accounting group, comprising the parent company as well as its subsidiaries.

### **Methodologies applied and calculation limitations**

The organisation's carbon footprint has been calculated according to the GHG Protocol. The total emissions of the base year, as well as of the subsequent years, shall be reported following a market-based approach, which takes into account our use and retail of renewable energy.

The following greenhouse gases were taken into consideration in the carbon footprint: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs) and sulphur hexafluoride (SF<sub>6</sub>)<sup>3</sup>.

The Group's information on scope 2 GHG emissions in gross terms includes solely the electricity consumed. In order to calculate the Scope 2 GHG emissions the Group has followed the location-based as well as the market-based approach. For the location-based emissions the Group uses average emission factors from energy generation for specified locations. While for the market-based emission the Group quantifies the GHG emissions of the producers from whom it purchased electricity under a contract.

Audax Renewables has identified its significant categories of Scope 3 by considering the estimated emissions of GHG together with the criteria established in the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. This identification process has involved factors such as financial expenses, influence, transition risks and opportunities, and the perspectives of the stakeholders. For information on excluded Scope 3 categories and its justification see paragraph "*Materiality and exclusions from GHG inventory*" of this section.

Both in the base year and in the calculation of the carbon footprint for the year 2024 actual data were used based on the activity for the greatest part of the emissions inventory. On the other hand, the following considerations have been taken into account:

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<sup>3</sup> The activities of Audax Renewables do not produce emissions of perfluorocarbons (PFC) or nitrogen trifluoride (NF<sub>3</sub>).

- The emissions from network losses have been estimated using information provided annually by the electric system operator of the national grid of each country, provided by the AIB (Association of Issuing Bodies).
- The emissions connected with the purchase of goods and services, i.e., the emissions connected with the supply chain - except for the purchase of gas and electricity - have been calculated using the approach based on expenses (EEIO).
- The emissions connected with the employee commuting have been estimated based on a survey on employees and relevant emission factors (DEFRA).
- The Group updates annually its Scope 3 GHG emissions for each significant category, based on the data on the activities of the reporting period. Consequently, the complete inventory of the Scope 3 GHG of the Group is updated in this regard.
- The emission factors used come from MITECO, AIB, DEFRA, the OCCC and, in the case of calculation of market-based scope 2, from Audax's suppliers.

#### **Materiality and exclusions from GHG inventory**

A limited number of categories of Scope 3 have been excluded from the carbon footprint assessment due to their lack of materiality or their irrelevance to the Group's operations.

##### **Upstream transportation and distribution**

Excluded because the associated emissions are not significant for the Group's activities, as its operations are predominantly of retail character.

##### **Downstream transportation and distribution**

Excluded, because the emissions related to the distribution of gas and electricity are already accounted for in other categories.

##### **Processing of sold products**

Excluded because the Group retails exclusively end products, therefore additional processing is not needed.

##### **End-of-life treatment of sold products**

Excluded because not applicable to the retailed products, which are gas, electricity and GOs.

##### **Franchise**

Excluded because Audax does not have franchise activities within its business model.

#### **GHG removal and GHG mitigation projects financed through carbon credits (E1-7)**

The subsidiary located in Italy in 2024 acquired 130,000 CO<sub>2</sub> credits through financing of the CO<sub>2</sub> removal projects, equivalent to 303,646 MWh of gas. In 2024 the company offset 62,157 t of CO<sub>2</sub>, and the rest will be offset during the next year. The financed projects are solar parks located in India and comply with the VCR-VERRA recognised standard.

#### **GHG removal and GHG mitigation projects financed through carbon credits (E1-8)**

The Company does not have an internal system of carbon pricing.

#### **GHG removal and GHG mitigation projects financed through carbon credits (E1-9)**

Audax does not provide this information under transitional provision of Appendix C of ESRS 1 of CSRD.

## 2.3 Biodiversity and ecosystems (ESRS E4)

### Objective

The objective of this chapter is to provide information necessary to understand how the activities of Audax Renovables affect biodiversity and ecosystems, as well as the activities that the company undertakes to protect and remediate the impacts of its activities on the ecosystems.

### Interaction with other ESRS

This chapter shall be read in connection with ESRS 2. General information.

### Disclosure requirements

Protection of biodiversity and ecosystems is a material question for Audax as a consequence of its activity of electricity generation from renewable sources. The conclusions of the double materiality assessment conducted in accordance with ESRS E4 - Biodiversity and ecosystems, establish as material the following topics and sub-topics of biodiversity:

ESRS	Topic	Sub-topic	Impact, Risk		IRO	
			or	Opportunity		
E4	Biodiversity and ecosystems	Direct impact drivers of biodiversity loss	Impact	Loss of biodiversity and ecosystems through direct use of rural land for the construction and operation of power plants.		
		Impact on the state of the species	Impact	Deaths, accidents and rescues of species in areas and surroundings of power plants.		

### Consideration of biodiversity and ecosystems in the strategy and business model (E4-1)

The fight against the climate change and the energy transition towards a low-emission economy are two of the main challenges addressed by the Group in the area of sustainability. The company is changing the way of producing, distributing and consuming energy, and the European regulators are promoting policies of climate neutrality such as the Paris Agreement, which prioritise renewable energy consumption over fossil fuels as a pathway to decarbonisation. In Europe the renewable sources constitute the main focus of the energy transition and, therefore, in 2019 the company decided to centre around the activity of energy generation from 100% renewable sources in order to make of Audax a vertically integrated company and continue promoting renewable energy consumption.

In line with the above, the Group has established as one of its main strategic goals the growth of renewable energy generation projects in order to provide the company with a portfolio of photovoltaic and wind projects that would contribute to the medium and long term sustainability of its business. At the close of the year 2024 the Group owns 14 power plants in different stages of development, 10 of which are photovoltaic plants and 4 are onshore wind farms located in Spain, France, Poland, Portugal, Italy and Panama.

The projects are in different stages of development and operation. The information on the situation of the portfolio and the progress of the projects is available to the stakeholders through the quarterly and half-yearly reports published on the company's corporate Website.

The solar and wind farms have direct impact on biodiversity and ecosystems, such as the loss of biodiversity and ecosystems by direct use of rural land for the construction and operation of power plants, or the deaths, accidents and rescues of species in areas and surroundings of power plants, and therefore there is high regulatory pressure for the implementation of measures of protection of the natural environment and ecosystems during all the stages of development of the projects. For each of the power generation projects environmental impact studies are conducted, as well as environmental management and monitoring plans are drawn up, and specific prevention and mitigation measures are implemented, adapted to the characteristics of the area and the species inhabiting it, always in compliance with the environmental and social requirements established by the administration.

The environmental legal framework applicable to the generation activity ensures that the execution of the generation projects of the company be carried out through the best practices during the stages of construction and operation, guaranteeing the protection of biodiversity and ecosystems, conservation of the historical heritage and well-being of the local communities where the power plants are located. All the generation projects are subject to favourable environmental decisions issued by the public administration bodies, which allow the company to legally commence the construction, installation of the power plants and which establish all the preventive and compensatory environmental measures to be undertaken for the protection of biodiversity.

The company has not conducted an analysis of biodiversity resilience as such, but has conducted an analysis of climate risks derived from the climate change, according to the description of paragraph ESRS E1 - Climate change. An analysis of the assets has been carried out taking into account the potential impacts of the climate change on the assets and on the ecosystems where these are located. The company has not identified significant system or transition risks with regard to biodiversity and ecosystems, which could affect significantly the strategy or the economic performance of the company.

The analysis of physical risks has been focused on power plants taking into account primarily the impacts on the loss of biodiversity and on the installations themselves as a consequence of the climate change. The analysis reveals that the only risks to which some of the power plants of the company are exposed are the drought and extreme heat. As a part of the analysis a set of mitigation measures has been established to be applied in the case of materialisation of the identified risks, such as for example: the implementation of dry cleaning systems to clean the photovoltaic panels, the installation of rainwater harvesting systems and an improvement of the fire prevention systems, among others.

In 2024 the company did not identify any high risk concerning the loss of biodiversity or related to the loss of species at risk of extinction or vulnerable to it. The rescues carried out, the wind studies and bird monitoring, the observation activities and equipment shutdowns are the control framework based on which the company analyses and evaluates these risks.

The Group has not received any sanction or fine for infringements related to biodiversity or the environment and no risk of non-compliance has been detected.

The company has two activities that are eligible and aligned with the Taxonomy Regulation. The generation activities aligned and eligible are:

- Electricity generation through solar photovoltaic technology
- Electricity generation from wind energy

In chapter 2.1 - Disclosure of information under article 8 of Regulation (EU) 2020/852 (the Taxonomy Regulation). Key performance indicators are disclosed concerning the turnover, CapEx and OpEx which adjust to the taxonomy under Delegated Regulation (EU) 2021/2178 of the Commission.

#### **Location of the assets**

Since 2023 the internal strategy of location selection for the power plants has been to avoid the situation in which the plants are located in protected areas through the selection of locations. The company avoids expressly that the plants be located in protected areas or recognised areas of high biodiversity value.

However, the Group has one power plant called "Pedregoso", located in Tarifa, whose surface is of 480 ha and it is located within the limits of the nature park Parque Natural de los Alcornocales. In accordance with the law, the wind farm obtained its authorisation established by Law 2/189 approving the Inventory of Protected Areas of Andalucía and establishing its protection rules. The authorisation, according to the provisions of art. 25.2 of Decree 292/1995 and art. 21 of Law 7/1994, was incorporated to the Environmental Impact of the farm.

The only actors of the value chain who interact with biodiversity and ecosystems in the power plants are the own workforce and the employees of the installation and maintenance firms commissioned by the company to perform the tasks in the locations.

The company applies mitigation measures related to biodiversity in accordance with the conclusions of the environmental impact assessment (EIA) and the provisions of the favourable environmental impact declarations (DIA) approved by the competent bodies under Law 21/2013 of 9 December on environmental assessment of installations for the production of electricity from solar and wind energy.

#### **Management of impacts, risks and opportunities**

The process of determining and evaluating material impacts, risks and opportunities related to biodiversity and ecosystems has been carried out by Audax in accordance with the provisions of chapter *1.4 Management of impacts, risks and opportunities*. During the process of IROs identification the results obtained from the analysis of physical risks derived from climate change and potential impacts detected were taken into account. The double materiality assessment conducted in accordance with ESRS E4 - Sustainability and ecosystems, establishes as material the following topics and sub-topics of sustainability:

- **Direct impact drivers of biodiversity loss**

Direct impact drivers of biodiversity loss of the company are connected with the sub-topic of direct exploitation of rural land for the construction and operation of the power plants, specifically, in the areas where the wind and solar farms of the Company are located. While a power plant is undergoing the development and construction process, specific research is carried out into the environmental impact on the land, local vegetation and fauna for the purpose of understanding the behaviours of the species dwelling in the area and establishing adequate environment protection and conservation measures.

The company does not contribute to direct impact drivers of biodiversity loss connected with the sub-topics of climate change, land-use change, freshwater-use change or sea-use change because it is not required by own operations. Neither does it contribute to the introduction of invasive alien species or pollution.

- **Impact on the state of species**

The impact of the wind turbines of the wind farms on birds is particularly relevant because of potential accidents caused on their flight paths. It is fundamental to analyse and understand the flight paths and the behaviour of the avian fauna of the area due to the risk posed by the wind turbines to birds. Audax focuses on reducing the bird mortality in all its wind farms and on monitoring the species at risk of extinction or vulnerable to it. The Company collaborates with Fundación Migres, a private non-profit entity, whose purpose is the study, conservation and propagation of nature and, in particular, the study of bird migration and its relation to climate change, geared towards preservation and improvement of heritage.

#### **Policies related to biodiversity and ecosystems (E4 -2)**

The Group has implemented the Environmental Policy applicable to all its subsidiaries and activities. The Policy is a general framework of reference for the purpose of integrating environmental aspects in the decision making and strategy of the Group. The policy was approved by the Board of Directors in 2023 and features the commitment and guidelines to be followed by the company with regard to the environment protection and biodiversity conservation.

It is related with the direct impact drivers of biodiversity loss because of land use and the impacts on the state of species, covering exclusively own operations. The company has not implemented specific biodiversity policies, nor agricultural, marine or deforestation policies, or policies related to potential social consequences of impacts related to biodiversity because it has not identified any risks or negative impacts on these topics. Neither are there legally applicable requirements which would obligate the company to have such policies implemented.

The Group has integrated robust environmental management systems to the activity of its subsidiaries and their environmental impacts. With this regard, the Hungarian subsidiary uses an environmental management certified under the ISO 14001 standard and the Spanish subsidiary Unieléctrica has obtained the ISO 50001 certification on its energy management system. As a part of its Sustainability Strategic Plan the Group continues working towards implementing certified environmental management systems in other companies of the Group.

While drawing up the Non-Financial Information Statement and conducting environmental controls, the Sustainability Manager, in close collaboration with the Generation Department, checks annually the environmental indicators of the Group in order to detect potential impacts, risks or opportunities and apply additional measures when necessary. The indicators are verified as a part of this Sustainability Statement.

#### **Actions and resources related to biodiversity and ecosystems (E4 -3)**

Biodiversity and ecosystem protection is a topic, which affects directly the energy generating activity of Audax Renovables, particularly in the areas where its wind and solar farms are located. Therefore, biodiversity protection is integrated into all the stages of the energy generation projects. While an installation is undergoing the construction process, research is carried out into local vegetation and fauna for the purpose of understanding the behaviours of the species dwelling in the area and establishing adequate environment protection and conservation measures. Once the construction is completed and the installation is put into operation, an exhaustive process of monitoring and tracking of these species is put in place as an integral part of the everyday operation of the facility.

For each of the power generation projects environmental impact studies are conducted and environmental management and monitoring plans are drawn up, which define the actions and measures of prevention and compensation to be implemented. In the case of wind farms, due to the risk posed by the wind turbines to birds, it is fundamental to understand the flight paths and the behaviour of the avian fauna of the area especially of the endangered species. The company collaborates with Fundación Migres, a private non-profit entity, whose purpose is the study, conservation and propagation of nature and, in particular, the study of bird migration and its relation to climate change, geared towards preservation and improvement of the natural heritage.

The protection and mitigation measures are specific to each power plant, some of the most common being the following: catching and marking, GPS monitoring, nest rescue, shutdown of the turbines, alignment of the blades during night-time hours or farming activities, grazing-related activities, among others.

When the monitoring team detects a situation of risk for a species, it should contact the control centre of the wind farm and request shutdown of those wind turbines, which pose a risk to the avian fauna at the moment. This procedure shall prevent potential collisions with the wind turbines. The shutdown of the wind turbines shall be the most strict possible, in order to reduce the probability of collision as well as to avoid unnecessary extension of the shutdown, and always meeting the shutdown criteria established in the instruction applied.

It is particularly important to locate the injured fauna in the wind farms in order to quantify the direct impact on birds and chiroptera. It is the main tool that allows to determine the areas of the highest danger within the farms as well as situations and meteorological conditions which pose major risk. Exhaustive inspections are carried out daily in order to locate the fauna injured by collision with the wind turbines, both at the base of each turbine as well as within the scope of 100 metres around it. Should an injured bird included in the lists issued by the Regional Delegations be located, the company shall report it to the competent body in order to transport the bird to a recovery centre or, in case of fatality, the presence of the environmental authority at the scene shall be required. However, in the case of species not included in the list issued by the competent Delegation it will not be necessary to report it to the Environment Agents. The specimen shall be collected by the surveillance team if it is deceased, or transported to a recovery facility if it is injured.

In order to monitor and prevent potential future impacts, all the impacts related to situations of risk to avifauna shall be registered for subsequent analysis and follow-up, whether or not the shutdown of wind turbines was involved, and the time elapsed between each one of the phases of the wind turbine shutdown shall be recorded.

- **Rescues and relocations**

16 rescues and relocations were carried out concerning groups of mammals and reptiles. All the rescues were carried out in the wind farm Toabré located in Panama. Two of the rescues were specimens of boa constrictor and rainbow boa, both species considered vulnerable according to the Regional Catalogue of Endangered Species of Panama. One rescue concerned a juvenile jaguarundi, a species also considered vulnerable. All the specimens were rescued and relocated.

- **Wind turbine shutdown**

During 2024 it was necessary to stop the wind turbines because of situations of risk to birds. The wind turbines were shut down 44 times. The shutdown time of the turbines (when at least one turbine was stopped) was of 28.5 hours.

- **Control of the vegetation**

Periodic control of the herbaceous vegetation of the photovoltaic plants is carried out through grazing, avoiding the use of the herbicides.

Reforestation is a usual compensatory measure required by law in the wind farms and photovoltaic plants for the purpose of restoring and preserving the natural habitats affected, and of compensating for a possible loss of vegetation due to the installation of wind turbines and photovoltaic panels. The most common practice is to reforest a number of hectares equivalent to the area covered with the installations. In 2024 the Group carried out replanting of seedlings in the total area of 25.29 hectares with predominant native trees of the area.

All the controls and actions carried out in relation to biodiversity are documented and monitored through monitoring reports, rescue and relocation plans and invoices or certificates of the action performed. The reports are made annually by various consulting firms and local environmental agencies in accordance with the law applicable in each location.

The company does not have access to the amounts in biodiversity topics because there is no specific classification for these expenses which would allow to differentiate them from operating expenses of the power plants.

#### **Targets related to biodiversity and ecosystems (E4 -4)**

The company has not established targets related to biodiversity and ecosystems at the moment because it considers that the impacts of power generation activity on biodiversity are duly covered by the actions and measures described above.

In line with the target of strengthening the internal regulations the company committed to draw up a policy concerning biodiversity topics, which shall be approved by the Board of Directors the next year and will address specifically biodiversity-related material impacts of Audax.

#### **Impact metrics related to biodiversity and ecosystems change (E4 -5)**

At the time of disclosing the following information the company relies on the metrics and actions related to biodiversity gathered in various reports on environmental impact of the photovoltaic plants and wind farms. The reports are made annually by various consulting firms and local environmental agencies in accordance with the law applicable in each location.

- **Vulnerable or endangered species in the installations' surroundings**

During the year 2024 more than 2,537 species were spotted and identified in the power plants. The spotting included 2 vulnerable species (Spanish imperial eagle and Iberian grey shrike) and one at risk of extinction (Egyptian vulture) according to the IUCN (International Union for Conservation of Nature) Red List. Moreover, the company registers the species identified according to the regional lists of endangered species applicable in each region. According to the regional lists, 29 species considered vulnerable and 5 at risk of extinction were spotted.

Monitoring campaigns and nest rescue actions were carried out concerning 6 birds, specifically Montagu's harriers, considered vulnerable according to the regional list, in order to contribute to their protection. Moreover, measures such as location and protection of nests, application of temporary restrictions in order to facilitate the reproduction of species, installation of nest boxes and conservation of large tree species are implemented.

- **Injured fauna**

Injured fauna is considered to be all the birds or chiroptera found injured or deceased, as well as rests of plumage and bones. In 2024, 26 injured specimens were located, 3 of them considered vulnerable according to the regional list of wildlife species under special protection. 7 of these specimens were deceased chiroptera of the *Pipistrellus pipistrellus* (bat) species, considered vulnerable according to the IUCN Red List.

The majority of the bird collisions concern species of a size smaller than domestic pigeon and are inevitable collisions (predominantly collisions with the wind turbine shaft) that are not included in the criteria for shutdown in the instructions of environmental monitoring programmes of the wind farms.

**Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities (E4-6)**

Audax does not provide this information under transitional provision of Appendix C of ESRS 1 of CSRD.

### 3. SOCIAL INFORMATION

#### 3.1 Own workforce (ESRS S1)

##### Objective

The objective of this chapter is to specify the disclosure requirements established by the CSRD Directive concerning own workforce, which shall enable users of the Sustainability Statement to understand the material impacts, risks and opportunities related to the persons working in the company.

##### Interaction with other ESRS

The chapter shall be read in connection with Chapter 1.4 of ESRS 2 - General requirements.

##### Disclosure requirements

##### Strategy

##### Interests and views of the stakeholders (ESRS 2 SBM-2)

The sustainability topics corresponding to ESRS S1 - Own workforce have proved to be material to Audax because the employees are a key strategic pillar of the company and are one of the most significant stakeholders to Audax, together with the clients. Human team is the Group's most valued asset, which plays a fundamental role in its operation and success. The interests and opinions of the employees on the strategy, processes and critical points of the business are one of the major levers of value generation of the company.

The Group fosters fluid communication on all organisation levels through its open door policy promoted by the Management in order to share suggestions, opinions and any type of concerns. The main communication channel of the employees are the meetings with the Management, where identified critical points are shared and improvement actions are determined.

##### Material impacts, risks and opportunities and their interaction with the strategy and business model (ESRS 2 SBM-3)

The process of determining and evaluating material impacts, risks and opportunities related to own workforce has been carried out by Audax in accordance with the provisions of chapter 1.4 Management of impacts, risks and opportunities.

The conclusions of the double materiality assessment conducted under ESRS S1 - Own workforce establish as material the following topics and sub-topics, all of them identified in own operations, related to the employees of the Group:

ESRS	Topic	Sub-topic	Impact, Risk or Opportunity		IRO
S1	Own workforce	Working conditions	Impact	Representation of the employees by trade union or Works Council	
			Impact	Occupational accidents, diseases or fatalities of own workforce and self-employed workers.	
			Impact	Create stable and quality employment.	
			Impact	Pay gap by gender	
			Impact	Reconciliation measures that support the distribution between professional and personal time.	
			Impact	Own workforce covered by collective agreements	
		Equal treatment and opportunities	Impact	Possible incidents of workplace harassment, violence or any situation of difference in treatment or opportunities that may arise in the company and affect its employees.	
			Impact	Training programmes for the employees	
			Impact	Employee performance evaluation model	
			Impact	Onboarding process for new employees	
			Impact	Improvement of the organisation model focused on the employee	
		Other work-related rights	Impact	Employment of persons with disability	
			Risk	Risk of losing a tender because of lack of updated Equality Plan	
		Impact	Violation of fundamental labour rights such as child labour or forced labour, which affect own workforce		

### Working conditions

The company has identified six material impacts related to the working conditions, two of which are negative and four are positive. The identified negative impact related to adequate wages is actual and is due to the pay gap by gender of the Group and that the majority of the management team of the company is comprised of men, thus creating a significant pay gap in the management positions. The second negative impact identified is a potential impact and is connected with potential accidents that the employees could suffer. The company has low accident rates, but the IRO is linked to the protection of human rights and workers' rights where the criteria of severity prevails over probability.

With regard to the four positive actual and material impacts, the company has identified the creation of quality employment, promotion measures for the reconciliation of the professional and personal life, the freedom of association of the employees and the number of employees covered by collective agreements as material IROs.

### Equal treatment and opportunities

The company has identified six material impacts related to equal treatment, of which five are actual positive impacts and one is a potential negative impact. With regard to the material positive impacts the company has identified IROs related to the improvement of the organisation model as a goal of the corporate strategy, the training programmes offered to the employees, the model of performance assessment, the new onboarding programme implemented in 2024 and employment of persons with disability. The only potential negative impact that is material for the company are the possible situations of workplace harassment, mobbing or any situation of difference in treatment or opportunities that may arise in the company and affect its employees.

## **Other work-related rights**

The only potential negative impact is connected with possible violations of the fundamental rights of the employees that may affect own workforce. Despite of the company having only own workforce in the European countries where the regulations are very stringent with regard to the respect of the fundamental rights of the workers, as it is a sustainability topic related to the human rights, the criteria of severity prevails over probability, thus making material the subject.

The company has not identified any material risk or opportunity related to own workforce.

## **Strategy**

### **Policies related to own workforce (S1-1)**

All the subsidiaries of the Group have a Human Resources Department responsible for the definition of the internal policies, guidelines and procedures related to the management of own workforce. The organisation's uppermost level responsible for the application of the policies related to own workforce is the Human Resources department of the Group led by the Chief People & Communication Officer.

The internal policies and procedures of the organisation related to own workforce are developed at local level and are applicable to the employees of the different subsidiaries depending of the country they are in. The policies and procedures are available from the Employee Portal and the corporate intranet. New policies and updates on the existing policies are communicated to all the employees by e-mail. The company makes the information available to the interested parties who may be affected such as employees of the value chain and stakeholders such as suppliers and clients who shall contribute to the application of the policies and procedures.

## **Human Rights**

Audax stays firmly committed to the defence of human rights in accordance with the Ten Principles of the UN Global Compact, to which the company continues adhered since 2013. Accordingly, Audax Renovables respects in all its activities the fundamental rights of its employees and public liberties recognised by national and international agreements and legal systems of the countries where it operates, such as stated in the Corporate Code of Ethics applicable to all the subsidiaries of the Group. In particular, it establishes the company's commitment with regard to the different identified material impacts: the commitment to human and labour rights, equal opportunities, the right to privacy, harassment prevention, work-life balance, health and safety of the employees, the commitment to training and development and the promotion of open and fluid communication between employees.

The company does not have a specific policy on human rights because the identified material impacts related to potential violation of human rights in the case of Audax Renovables are specifically referred to labour rights, addressed by the employee policies and procedures. The policies and procedures related to employees do not explicitly address the treatment of human beings or forced labour or compulsory labour or child labour, because it has not detected any impact, whether actual or potential, or any potential risk related to these violations of human rights in its own activities or in its value chain.

## **Equal treatment and opportunities**

The Group does not have a specific equal treatment policy, but it does have a Harassment Protocol, whose objective is to promote workplace environment free of any conduct susceptible to being construed as harassment or bullying in the workplace. The protocol defines what kind of conduct is considered as workplace harassment and specifies a procedure to be followed in a situation of workplace harassment. In this regard, the use of the Whistleblowing Channel is also encouraged as a means of secure and confidential communication available to all the employees. The protocol is applicable to all the subsidiaries of the group and is available to the employees through the corporate intranet.

The Spanish company has an Internal Equality Plan, which was implemented in 2020 and is currently being updated. During the year the company has worked on the update of the plan in cooperation with an renown firm with expertise in the area. The plan shall specifically address the issues of discrimination based on gender and age, both topics considered material to the company.

#### **Work-life balance**

The group promotes among all its subsidiaries the balance between the professional and personal life and has implemented policies designed to facilitate the distribution of professional and personal life in all its subsidiaries, agreed individually with the employees, such as: teleworking conditions, working-time reductions and flexible hours. Not all the employees are covered with these policies in general, there should be certain conditions met for the agreement to be adaptable to the workplace.

The policies and agreements related to the work-life balance shall be approved by the direct managers of the employees and human resources.

#### **Health and safety of own workforce**

The company does not have a specific policy on health and safety, but all the subsidiaries of the Group have various guidelines and procedures in health and safety topics, such as: occupational risk prevention plans, self-protection plans and internal guidelines and training on occupational risk prevention in the workplace and in teleworking situations, self-protection plans etc. The majority of the subsidiaries have external prevention services in close cooperation in order to define and implement all the necessary policies and measures of health and safety and occupational risk prevention.

Particularly, the subsidiary located in Hungary has a Health and Safety Management System certified in accordance with the ISO 45001 standard.

#### **Remuneration policy**

All the subsidiaries have a remuneration policy based on a fixed element and a variable part, which is evaluated annually, and not all the employees are subject to this policy.

The Group strives to ensure a just remuneration based on the equality principle, as it is stated in individual human resource policies of the subsidiary companies of the Group. This commitment is also noticeable in the organisation's Code of Ethics and Conduct, where it is explicitly stated that the Group "promotes equal opportunities between men and women in recruitment, training and promotion of professionals in their working conditions".

#### **Processes for engaging with own workforce and workers' representatives about impacts (S1-2)**

Audax understands that the perspectives and opinions of its own workforce are form the basis in the company's decision-making processes, in particular concerning the identified impacts. In all the subsidiaries of the Group, except for the subsidiary located in Hungary and the subsidiary located in the Netherlands, the processes of cooperation with own workforce are designed directly with own employees. The Group fosters fluid communication at all organisation levels through its open door policy promoted by the Management in order to share suggestions, opinions and any type of concerns. The main communication channel of the employees are the meetings with the Management, where identified critical points are shared and improvement actions are determined. Generally, all the employees may contact the human resources manager of the subsidiary in order to communicate any important aspect.

The communication in order to cooperate with the employees may be initiated by the employee or by the Management and does not have any determined frequency. General managers together with the managers of the Human Resources departments are operationally responsible for ensuring that the cooperation with the employees is taken into account in the decision-making process of the company.

In the case of the Hungarian subsidiary, the company has a Works Council and a trade union, with whom the General Manager negotiates and consults at fixed intervals (half-yearly, yearly, etc.). The function of the works council is to represent the interests of the employees of Audax before the management, while the role of the trade union is to represent the interests of the employees of the sector before the management, for example in remuneration negotiations.

The subsidiary located in the Netherlands also has a Works Council, which plays a key role in the interaction with the workforce. One of the most important rights established by the Dutch law is the right to consent (*instemningsrecht*), which allows the company's council to approve or reject the suggested changes in the policies that affect directly the workforce. It may be applied to decisions related to the work schedule of the employees, remuneration systems or health and safety measures. Through regular consultations with the company's council the company ensures that the opinions of the employees are taken into account in the decision-making processes. These consultations are carried out in the key stages according to the nature of the matter in question. Moreover, the feedback of the company's council is fundamental to designing the policies in order to ensure that these are aligned with the legal requirements as well as with the expectations of our workforce.

In addition to the quarterly periodic meetings and the comments shared through the minutes of the meetings in the intranet, there are at least two meetings a year between the works council and the management in order to debate questions and ensure coordination. This structured approach to the participation helps the company to effectively address the potential impacts on the employees, ensuring at the same time compliance with legal requirements.

In general, the Group applies the same communication mechanisms described above in order to take into account the opinions and interests of the employees who may be vulnerable to the impacts, such as employees with disability or migrants. The Dutch subsidiary, whose regulation is more ambitious in this respect and recognises nursing mothers as vulnerable workers, imposes the obligation to establish specific measures to protect them, allowing them to use 25% of their working hours for breast milk expression, and to create spaces for that purpose.

It is certain that the company pays special attention to the possible obstacles or barriers faced by those employees, but at the moment no indication has been noted of an issue that would require specific measures to collaborate with the employees in such situation beyond the measures described above.

#### **Processes to remediate negative impacts and channels for own workforce to raise concerns (S1-3)**

Generally, the incidents or negative impacts related to own workforce are treated individually depending on the severity of the impact and the necessary measures to be applied in order to remediate it. Each subsidiary has a Human Resources Manager, who is in charge of defining and implementing the necessary measures to remediate the negative impacts that could affect own workforce. Moreover, the Group has a Group Chief People Officer, the leading manager responsible for the correct remediation of the negative impacts affecting the employees of the Group, and who supports the local managers in the performance of their duties.

The employees may communicate their concerns or needs regarding the company, staff management and its policies directly to their superiors, to the local human resources managers, to the Group Chief People Officer and to the Compliance Officer. Audax applies the open-door policy promoted by the Management to share all kinds of concerns or impacts that could affect the company's employees.

The company has implemented its Whistleblowing Channel as a mechanism for the purpose of addressing impacts, claims or complaints related to own workforce and work issues, which can be used by the employees and their representatives anonymously and with respect to the non-retaliation principle, as described in chapter 4.1. of ESRS G1.

The company considers that its employees are aware of and have confidence in these channels for the communication of their concerns through various initiatives carried out in its subsidiaries. In 2024 various subsidiaries of the Group conducted satisfaction surveys among their employees through an external independent firm, where the employees responded anonymously. The surveys included questions on work-life balance, cooperation, management support, information provided by the management, and development opportunities.

In 2023 the Group conducted among its employees a survey on the ethical climate, which included questions on the speak-up culture and the whistleblowing channel in order to evaluate the perception of the employees of Audax concerning the availability, purpose, confidentiality and management of the Whistleblowing Channel and boost confidence in the use of the channel to communicate the negative impacts in good faith and without fear of retaliation.

Audax contributes to the achievement of Sustainable Development Goal 8, specifically global goal 8.8. on labour rights protection and promotion of safe and secure working environment for all. The growth of Audax in recent years has been exponential, and not only in the economic aspect. At the close of the year 2024 the staff is comprised of 783 employees, while at the end of the previous year there were 755 employees.

#### **Adopting measures related to the impacts, risks and opportunities for own workforce (S1-4)**

In case of detecting negative impact, actual or potential, on own workforce, risks or opportunities related to own workforce, the local human resources departments are responsible for investigating the impacts and applying the necessary actions to mitigate and/or implement them. The impacts, risks and opportunities are assessed individually. The company describes below specific measures adopted to address the material impacts, risks and opportunities identified.

With regard to the positive material and actual impacts, the company has continued working during 2024 on increasing the staff by creating quality employment, offering training and development plans to improve the knowledge and expertise of its employees. Regarding work-life balance, all the subsidiaries of the Group have implemented a hybrid model of office and teleworking, depending on their needs and whether the job position allows it. The work-life balance measures are highly valued by the employees and contribute to improving their personal life and work life by adjusting their specific circumstances.

In order to improve its organisational model, one of the identified material impacts, the Group is implementing an ERP: *SAP Success Factor*, to strengthen the controls on employee information of the Group for the purpose of improving the data management, unifying the processes among the subsidiaries and improving the data consolidation process at the Group level. The implementation of the tool is carried out in cooperation with a Big Four firm and terms have been established for designing, implementing, testing and putting into operation of the platform in the different subsidiaries. The project is led by the Chief People & Communication Officer and the system is expected to be launched in 2025.

Regarding freedom of association, talks were initiated during the year with a trade union at the Headquarters level. The company has also tackled the update of the Equality Plan in cooperation with an renown firm with expertise in the area. The approval of the update is expected in 2025.

In order to address the identified negative impact related to adequate wages, the company has carried out a remuneration audit of the years 2022 and 2023 in cooperation with an independent expert to obtain comparative data regarding the current market, and to draw up a plan of improvement of the employee remuneration and try to reduce the possible inequalities among the employees.

Regarding the potential negative impact related to health and safety, the company offers annual training on occupational risk prevention and has implemented procedures and guidelines on health and safety (occupational risk prevention plans, self-protection plans and internal guidelines on occupational risk prevention in the workplace and in teleworking, among others).

Considering the risk of losing a tender because of lack of updated Equality Plan, the company has undertaken its update, and the Plan is expected to be registered in the first quarter of 2025.

The company evaluates the efficacy of the actions and initiatives carried out, based on the direct feedback from its employees and from the suggestion boxes made available in the subsidiaries. Moreover, the company monitors certain indicators, such as number of accidents, hours of absenteeism and performance assessment to ensure that the applicable policies are complied with. Local human resources managers, together with the Chief People & Communication Officer, are the leading managers for the task of defining and implementing the actions and initiatives related to own workforce.

## Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5)

The company has not yet established targets related to managing negative impacts in a formal way, but in 2024 tackled the actions described in the previous paragraph: Adopting measures related to the impacts, risks and opportunities for own workforce (S1-4).

## Characteristics of the company's employees (S1-6)<sup>4</sup>

The information on the staff of the company includes the number of employees at the end of the reporting period<sup>5</sup>. Moreover, the information disclosed on own workforce represents 96.6% of the employees of the Group.

### Number of employees by gender<sup>6</sup>:

Gender	Number of employees
Men	319
Women	464
Other	N/A.
Not notified	N/A.
<b>Total</b>	<b>783</b>

### Number of employees by country where there are more than 50 employees<sup>7</sup>:

Country	Number of employees
Spain	370
Hungary	183
The Netherlands	109
<b>Total</b>	<b>662</b>

### Number of employees by type of contract, broken down by gender<sup>8</sup>:

Men	Women	Other	Not disclosed	Total
Number of employees (head count)				
319	464	N/A.	N/A.	783 <sup>9</sup>
Number of permanent employees (head count)				
298	446	N/A.	N/A.	744
Number of temporary employees (head count)				
21	18	N/A.	N/A.	39
Number of employees of non-guaranteed hours (head count)				
N/A.	N/A.	N/A.	N/A.	N/A.
Number of full-time employees (head count)				
301	384	N/A.	N/A.	685
Number of part-time employees (head count)				
18	80	N/A.	N/A.	98

<sup>4</sup> Note 19 – Income and Expenses of the consolidated Annual Accounts includes the information on the accumulated average staff as at 31 December 2024.

<sup>5</sup><sup>6</sup><sup>7</sup><sup>8</sup> The information disclosed on own workforce represents 96.6% of the employees of the Group.

### Number of employees by type of contract, broken down by country<sup>10</sup>

In line with the commitment to create stable and quality employment, the Group encourages indefinite employment contracts for professionals. As at 31 December 2024, 95% of the employees have indefinite contracts, while only 5% are temporary employees.

Spain	Hungary	The Netherlands	Italy	Portugal	Poland	Germany	Total
Number of employees (head count)							
370	138	109	49	33	32	7	783
Number of permanent employees (head count)							
364	182	81	47	32	32	6	744
Number of temporary employees (head count)							
6	1	28	2	1	0	1	39
Number of employees of non-guaranteed hours (head count)							
N/A.	N/A.	N/A.	N/A.	N/A.	N/A.	N/A.	N/A.
Number of full-time employees (head count)							
311	180	79	43	33	32	7	685
Number of part-time employees (head count)							
59	3	30	3	0	0	0	98

### Total number of employees who left the company<sup>11</sup>

During the reporting period the total number of employees who left the company was of 106. In total, 48 employees left the company voluntarily and 50 were dismissed during the period.

### Staff turnover rate<sup>12</sup>

The staff turnover rate during the reporting period was of 13.7%. A total number of 106 employees left the company for different reasons (voluntary resignation, dismissal, retirement or death in service). In order to tackle these departures, the Company incorporated a total number of 152 employees throughout the year.

### Characteristics of non-employees in the company's own workforce (S1-7)

The company understands a non-employee to be persons with contracts to supply labour to the company («self-employed people») as well as people provided by firms primarily engaged in «employment activities» according to NACE Code N78.

The information on non-employees of the company includes the number of employees at the end of the reporting period. At the end of the year Audax informs on 17 non-employees in own workforce of the company.

<sup>10</sup> <sup>11</sup> <sup>12</sup> The data disclosed on own workforce represent 96.6% of the employees of the Group, with 4.4% excluded due to lack of homogenisation of the information.

## Collective bargaining coverage and social dialogue (S1-8)

### Collective bargaining coverage and social dialogue by country with number of employees >50<sup>13</sup>

Coverage rate	Collective bargaining coverage		Social dialogue
	Employees - EEA (for countries with >50 employees representing >10% of total workforce)	Employees - Non-EEA (estimate for regions with >50 employees representing >10% of total workforce)	
0-19%	N/A.	N/A.	Spain
20-39%	N/A.	N/A.	N/A.
40-59%	N/A.	N/A.	N/A.
60-79%	N/A.	N/A.	N/A.
80-100%	Spain Hungary The Netherlands	N/A.	Hungary The Netherlands

## Diversity metrics (S1-9)

### Gender distribution at top management<sup>14</sup>

The top management is comprised of three members, two of them men and one woman, meaning there is 33% of female representation in top management and 66% of male representation.

Top Management	Number of employees
Men	2
Women	1
Other	N/A.
Not notified	N/A.
<b>Total</b>	<b>3</b>

### Age distribution among the employees<sup>15</sup>:

Of the total number of employees approximately 13% are under 30, 72% are between 30 and 50, and 15% are over 50 years old.

Age	Number of employees
<30	101
30-50	561
>50	121
<b>Total</b>	<b>783</b>

## Adequate wages (S1-10)

All the employees of Audax Renovables are paid an adequate wage, in line with applicable benchmarks, Directive (EU) 2022/2041 and applicable local regulations on minimum wage.

The company understands adequate wage to be the total remuneration of the employee including, apart from the wage, other elements that vary among the employees. Among those elements there are incentive plans, variable supplements and other benefits such as health insurance, which contribute to reduce the essential expenses and provide financial security.

<sup>14 13</sup> The information disclosed on own workforce represents 96.6% of the employees of the Group.

### **Social protection (S1-11)**

100% of the Group's employees are covered by social protection against loss of income due to sickness and work accidents. The employees in Spain, the Netherlands, Hungary, Italy and Germany are covered by social protection measures against loss of income due to unemployment from the employee's beginning of work for the company, due to sickness or disability acquired through work-related accident or disease, paternal leave and retirement.

The employees of the subsidiary in Poland are covered by social protection against loss of income due to sickness or disability, but they are not covered by social protection against loss of income due to unemployment from the employee's beginning of work for the company, nor paternal leave or retirement. The employees of the subsidiary in Portugal are not covered by social protection.

### **Persons with disabilities (S1-12)**

The Group has consolidated the information on employees with disability in accordance with the legally applicable definitions in each of the countries where the Company operates. In 2024 the company comprised 7 persons with disability, representing 1% of the total number of employees, similar to the figure disclosed the previous year.

### **Training and skills development metrics (S1-13)**

#### **Number of employees who participated in periodic performance assessment<sup>16</sup>**

In 2024 75% of the employees of the Group's subsidiaries participated in annual performance assessments with their direct superiors. The employees make one performance assessment a year and in 2024 all the performance assessments planned by the management were carried out. The assessment process involves the human resources departments in order to ensure that the assessment process is complied with and the equality principles are respected. 590 employees were evaluated on their performance in 2024, 282 of them were men (88% of the total number of men) and 308 were women (66% of the total number of women).

#### **Average number of hours of training by employee and by gender:**

<b>Gender</b>	<b>Average number of hours of training</b>
Men	11.7
Women	12.6
Other	N/A.
Not notified	N/A.
<b>Total average number of hours of training</b>	<b>12.2</b>

### **Health and safety metrics (S1-14)**

100% of the employees of Audax are covered by health and safety management systems of the company, based on the local legal requirements applicable to the different subsidiaries of the Group. Only the subsidiary in Hungary has a health and safety management system certified in accordance with ISO 45001 international standard.

In 2024 there were no fatalities in consequence of work-related injuries and health problems. The rate of accidents recorded is of 1.36%, with 2 work-related accidents. In total, 65 days were lost to work-related injuries in consequence of work accidents.

### **Work-life balance metrics (S1-15)**

92% of the Group's employees are entitled to family-related leave in accordance with the local regulations applicable in each country.

## Remuneration metrics: pay gap and total remuneration (S1-16)

### Pay gap by gender<sup>17</sup>

The Group's pay gap is of 41%<sup>18</sup> and has been calculated as the difference between the average remuneration levels of the female and male employees, represented as the percentage of the average remuneration level by hour of the male employees.

Upon updating the pay gap by professional category, the company concludes that the difference between the remuneration received by men and women is highlighted in management posts because the majority of those posts are occupied by men, specifically 25 of the 32 existing management posts are occupied by men, while only 7 managers are women.

Pay gap (%) <sup>19</sup>	Management	Leadership	Middle Management	Others
2024	42%	19%	16%	29%

At the end of 2023 the Group's pay gap was of 41%, a similar figure to the one calculated at the close of the present year<sup>20</sup>.

The annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual) is of 16.15.

## Incidents, complaints and severe human rights impacts (S1-17)

During the reporting period Audax Renovables did not register any incident or complaint concerning severe human rights impacts among its own workforce or the rest of the stakeholders, nor did it incur any fines or sanctions related to those matters.

Neither were there any work-related incidents of harassment or discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation or other relevant forms of discrimination involving own workforce or internal and/or external stakeholders across the company's operations in the reporting period. The company did not incur any fines or penalties related to situations of harassment.

### 3.2 Consumers and end users (ESRS S4)

#### Objective

The objective of this chapter is to provide information on how the company affects its end clients who purchase its services, in terms of impacts, risks and opportunities.

#### Interaction with other ESRS

The chapter shall be read in connection with Chapter 1.4 of ESRS 2 - General requirements.

#### Disclosure requirements

#### Strategy

#### Interests and views of the stakeholders (SBM-2)

The topic of ESRS S4 on consumers and end users has been considered material to Audax as a consequence of the activity of energy retail. The main activity of Audax Renovables is the retail of electricity and gas to end consumers, which makes of the consumers the primary source of income of the company and a fundamental strategic pillar for the sustainability of the business in the long term, therefore consumers and end users are the most significant stakeholders of Audax.

<sup>17</sup> The information disclosed on own workforce represents 96.6% of the employees of the Group.

<sup>18</sup> The data is not comparable with that of the previous year due to a change in the calculation methodology.

<sup>19</sup> Pay gap of senior management is not disclosed due to data confidentiality and privacy.

<sup>20</sup> The company does not inform on the breakdown of the pay gap by professional category because of the different calculation criteria used in the present year, which makes comparison impossible.

The majority of the Group's clients are businesses and domestic users. During recent years the Group has focused its strategy on corporate instead of domestic sector, thus the industrial sector represents 46% of the total number of clients and domestic users represent 54%.

The company concentrates on the client and their adequate management; therefore, all the Group's subsidiaries have their own Customer Service Department, focused on addressing the concerns, doubts, incidents and/or complaints through the established different communication channels. The Group makes available to its customers various bilateral communication channels to give them a voice and thus be able to consider their needs and expectations related to the services provided by the company. Their interests and views are essential for evaluating the transparency and suitability of the services and the information provided by the company.

#### **Material impacts, risks and opportunities and their interaction with the strategy and business model (SBM-3)**

The process of determining and evaluating material impacts, risks and opportunities related to end users has been carried out by Audax in accordance with the provisions of chapter 1.4 of ESRS 2 IRO-1: Description of the processes of determining and evaluating material impacts, risks and opportunities.

The conclusions of the double materiality assessment conducted in accordance with ESRS S4 - Consumers and end users, establish as material the following topics and sub-topics related to client management:

ESRS	Topic	Sub-topic	Impact, Risk or Opportunity	IRO
S4	Consumers and end users	Impacts related to the information for consumers and/or end users	Impact	Communication channels for customers' complaints and requests
			Impact	Privacy of information and client data breaches
			Impact	Access to quality information
		Personal security of the consumers and/or end users	Impact	Indirect sales channels that use dishonest marketing practices
			Impact	Incidents related to the use and maintenance of the gas installations by customers and end users
		Social integration of consumers and/or end users	Impact	Restrictions in contracts with customers in situations of social exclusion

#### **Impacts related to the information for consumers and/or end users**

Most of the identified impacts related to the information provided by the company to its clients are positive and existing impacts. Being a listed company it is essential to make available to the customers transparent and accessible information on the services and products offered by the company, the prices and the organisation policies, which will allow the clients to make informed decisions according to their needs and expectations.

With regard to the sub-topics of access to information and freedom of expression it should be noted that all the consumers, and stakeholders in general, may freely express their concerns, views, complaints, requests and any information they consider relevant through the communication channels made available to the by the Group. All the subsidiaries have their own Customer Service Department centred around giving a personalised response to any possible concerns, doubts, incidents and/or complaints of their clients. Moreover, in order to evaluate the quality and remedies provided to the clients, the company collects its feedback through satisfaction surveys to evaluate the service received and analyses the reviews included in public websites by its clients.

The company is particularly sensitive to the privacy of its clients and protection of their personal data, and therefore the sub-topic of privacy has been considered as material due to its positive impact to the company. The clients may access and consult the information on their invoices and energy consumption through secure channels on the websites. The Data Protection Officer of the Group is responsible to monitor the compliance with all the applicable regulations on privacy and use of information.

The Group makes an important commercial effort to attract and retain customers through different sales channels: direct sales, indirect sales, online sales and resellers. It is specifically on the indirect sales channels where the company has identified an actual negative impact due to a penalty imposed by the CNMC for irresponsible marketing practices used by one of the indirect sales channels of Audax in 2021.

The CNMC imposed a sanction of €1.5 million on Audax Renovables for potentially irregular conduct in consumer contracts in 2019. The Company lodged an administrative appeal with the National court, which has not been yet resolved. In 2022 the CNMC issued a disciplinary decision imposing a sanction of €9.258 million on various subsidiaries of the Audax Group. The companies involved lodged an appeal against the decision with administrative court and requested precautionary measures in the form of (i) suspension of the obligation to pay the sanction and (ii) suspension of the application of the resolutions concerning the prohibition of entering into contracts with public administrations. The appeal was admitted for processing in January 2023. In the case of Audax, the precautionary suspension was approved by judicial decision.

#### **Personal safety of the consumers and/or end users in gas installations**

Being a natural gas retailer, the company is aware that each year there are several fatalities derived from the use and maintenance of gas installations by the end-users. According to a recent investigation of the *Universidad Jaume I de Castellón in Spain*, the use of gas kitchens is the cause of approximately 40,000 premature deaths per year in Europe. Audax does not have responsibility nor control of possible incidents related to the use and maintenance of the gas installations by customers and end users. In this case the negative impact detected is related to the downstream value chain, specifically the distribution companies and the consumers themselves, the main parties responsible for the reviews, maintenance and quality of their installations.

#### **Social integration of consumers and/or end users**

Audax is aware that there are certain vulnerable communities and persons at risk of social exclusion who may face additional barriers to obtaining quality energy services. With this regard the European regulation establishes the obligation of large retailers to offer a discount rate. Audax, being an independent retailer, does not offer this service at the moment. Despite having detected a potential negative impact, the company has never received any complaint or claim for discrimination reasons.

The Group has not detected any material risks related to potential infringement of human rights of its clients or of any actor of its value chain.

#### **Policies related to consumers and end users (S4 -1)**

The company has implemented customer service guidelines which establish the principles of addressing possible claims and complaints of the clients. There are protocols of verification of calls, authorisation of third parties, and the company has also defined various protocols of action depending on the type of incident reported by the client, in order to provide personalised attention and remediate any possible impact quickly and efficiently.

Every subsidiary has its own multichannel customer service system and the consumers can contact Audax directly by telephone, e-mail, personally in the offices, by traditional mail or through social networks. Moreover, all the subsidiaries have an exclusive portal for the customers, which allows them to view and control their invoices, change their personal information and register the status of their electricity meter.

The company has implemented Privacy Policy in accordance with Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016, applicable to all the subsidiaries, on protection of natural persons with regard to the processing of personal data and on the free movement of such data. The organisation's uppermost level responsible for compliance with the policy is the Global Data Protection Officer (DPO) of the Group. The Policy is accessible through the corporate websites of the Group and informs the users of the purpose for which personal data are collected, so that they can decide freely and voluntarily if they want to share the requested information.

In general, the Corporate Code of Ethics features the company's commitment to the protection of the fundamental human rights in accordance with the 10 UN Guiding Principles on Business and Human Rights.

#### **Processes for engaging with consumers and end-users about impacts (S4-2)**

All the subsidiaries of the Group have their own Customer Service Department centred around addressing any possible concerns, doubts, incidents and/or complaints of their clients.

The Group has established various communication channels as the basis of the process for engaging with consumers about impacts and/or complaints. The clients can contact the company by telephone, e-mail, personally in the offices, by traditional mail and/or through social networks.

The communication channels made available are not intended exclusively for addressing the impacts and/or complaints, they are also used by the clients for the purpose of expressing their needs and expectations. The company receives daily feedback from its clients and uses it while making strategic decisions related to the services and products offered by the company, or to improve those services and products, or to remediate any detected impact.

The general manager has the ultimate responsibility for ensuring that the needs and expectations of the clients are considered in the decision-making process of the company and influence the focus of the Group.

#### **Processes to remediate negative impacts and channels for consumers and end users to raise concerns (S4 -3)**

Audax Renovables has various processes to remediate the negative impacts related to its clients, depending on the nature of their claims or complaints. The company has implemented internal action protocols for determined claims, such as, for example: invoice errors, breakdown, supply cuts, discrepancies between invoiced items and rectification of personal data, among others.

Despite of the fact that each subsidiary has its own process and protocols, and internal actions adapted to the local regulations of each country of operation, all the processes are defined around a common basis. Firstly, the claim and/or complaint is registered. The company always tries to tackle the incident and/or complaint online and therefore applies immediately the necessary measures and, if the incident is solved, it gets closed. Otherwise, the incident is categorised as pending and the customer service department proceeds to adopt the necessary measures to solve the incident and/or complaint as quickly as possible.

All the subsidiaries have a register of incidents, claims and/or complaints where they record all the incidents/complaints received, specifying the channel, the date of occurrence and the status of the issue, among others. The company evaluates the efficacy of the measures implemented to solve the incidents reported by its clients by analysing the notifications and monitoring the calls as part of the internal operating control, analysing the number of complaints that need reopening and reviewing the results of the satisfaction surveys. In the cases when the company receives negative results of the surveys, it contacts the client to obtain more information on the reasons of the negative assessment and to engage in remediation to avoid the necessity to repeatedly contact the client regarding the same complaint.

The company also has a Whistleblowing Channel accessible by third parties, which protects the anonymity of the persons and respects the principle of non-retaliation, such as described in the disclosure requirements G1-1: Business conduct policies and corporate culture of Chapter 4 of this document.

#### **Taking action on material impacts on consumers and end- users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions (S4-4)**

All the Group's subsidiaries have their own Customer Service Department, which reports organisationally to the Commercial Department and is responsible for the definition and implementation of the necessary measures for managing material impacts identified by the company. Depending on the nature of the identified impacts, the Customer Service department defines the measures to be implemented and assigns human and economic resources necessary for the implementation of the suggested measures, always upon approval of the Commercial Department manager. The company received a total number of 7,664<sup>21</sup> complaints and/or claims during 2024

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<sup>21</sup> The number of claims and complaints received by the Dutch subsidiary is not included due to limitations in access to information.

and resolved 97% of them. The method used most frequently by the customers to contact the company has been by e-mail.

The Group uses different sales channels (direct sale, indirect sale and online sale) which are monitored to prevent potential negative impacts on the clients in relation to the services offered by the company, the marketing practices used to attract new clients and data usage. The monitoring is also carried out by the Customer Service department and consist in monitoring the calls between the clients and the sales channels to assess whether the marketing practices used are appropriate. Regarding data usage, the company has a Data Protection Officer in place, who is responsible for the appropriate management of the data and compliance with the applicable regulations in these matters.

The company strives daily to ensure that its customers receive personalised service and quality, transparent information, therefore in 2024 the company has been implementing a Chatweb as an additional communication channel. It has also been working to improve the specialisation of the agents by type of client to ensure that the clients receive totally personalised service and attention.

With regard to the identified actual positive impacts, the company continues endeavouring to ensure that its clients receive personalised service and quality, transparent information, therefore in 2024 the company has been implementing a Chatweb as an additional communication channel. It has also been working to improve the specialisation of the agents by type of client to ensure that the clients receive totally personalised service and attention.

Regarding the persons and/or communities at risk of exclusion, the company does not have information on potential situations of vulnerability or exclusions of its clients if it is not informed by them. Audax made the decision of not cutting off the supplies of electricity and gas to domestic customers in general to avoid negative impacts on vulnerable persons. During this year, and always when exceptional circumstances occur, such as the natural disaster of DANA in Valencia, the company applies additional measures for its clients, such as launching personalised service campaigns, through which it offers deferment of invoice payments.

The company is especially mindful of the need to protect the personal data of its clients and website service users. If any incident related to potential breach of information occurs, the Global Data Protection Officer (DPO) is notified immediately in order to investigate and remediate it. About personal safety of the customers of Audax Renovables, the company has not adopted any measures beyond promoting the care and use of its installations, especially of gas, due to the potential consequences. The company does not have operating control over the state of the installations nor of the use of them. No case has occurred and no penalty has been imposed in the area of human rights in relation to the clients or the rest of the stakeholders.

#### **Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4 -5)**

The company has not established targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities.

## 4. GOVERNANCE INFORMATION

### 4.1 Business conduct (ESRS G1)

#### Objective

The objective of this chapter is to provide information on the strategy, approach, processes and procedures and performance of Audax Renovables with regard to business conduct.

#### Interaction with other ESRS

The chapter shall be read in connection with Chapter 1.4 of ESRS 2 - General requirements.

#### Disclosure requirements

#### Governance

##### The role of the administrative, management and supervisory bodies (GOV-1)

The Board of Directors of Audax, by itself or through its delegated committees, is the main body responsible for formulating, approving and implementing all the policies, procedures and protocols related to business conduct and legal compliance within the organisation.

The Board of Directors requires that the conduct of all the managers, employees and external partners should be aligned with the applicable legislation and regulations, as well as with the principles and values of the Code of Ethics and other applicable internal regulations.

In line with this ethic culture and legal compliance, the Board approved a Compliance and Criminal Risk Prevention Model (hereinafter, the "Compliance Model" or "Model") which includes all the elements, procedures and controls necessary for effective prevention, detection of and reaction to potential criminal acts, highlighting the Policy and Handbook on Compliance and Criminal Risk Prevention.

The main functions of the Board of Directors of Audax with regard to business conduct, and which it is engaged in supervising and monitoring through the Audit Committee, are the following:

- Supervising the compliance with the Company's internal codes of conduct and corporate governance rules.
- Meeting the highest ethic standards by the administrative body.
- Promoting the compliance culture through public commitment of the administrative body.
- Adopting, implementing, maintaining and continually improving the Model and the established standards.
- Provide the compliance department with adequate technical and economic resources.

The company's three lines of defense model, established in order to improve risk control and management, including management of legal compliance and criminal risks, is comprised of:

- **The first line:** comprised of the managers of the operating areas who oversee and control the risks daily;
- **The second line:** comprised of the supervision functions, such as the Risks function, Compliance function, as well as the Sustainability and ESG function, each one of them supervising the policies and procedures of their own area;
- **The third area:** comprised of the Internal Audit Department, in charge of providing independent assessment of the effectiveness of the internal control and risk management systems.

The managers of the areas and departments in charge of the control, management and monitoring of the company's activities constitute the "first line of defence" of the Compliance Model. Their function is to supervise the compliance with the policies, procedures, laws, standards and other regulations, which may have significant impact on the everyday operations of the Group.

During 2024 the Criminal Compliance Committee (CCP) ceased its activities on 15 May 2024, at which date the Board of Directors of Audax Renovables (through its delegated body, the Audit Committee) approved the dissolution of the CCP and the subsequent appointment of the Group Compliance Officer (hereinafter, GCO). This new position is in charge of the management, control and supervision of the compliance model of the Group and its various subsidiaries. As a consequence of the implementation of the Compliance Model, the position of

Compliance Officer was created, as well as local managers for the implementation of the Model were appointed in each of the subsidiaries comprising the Company, who report to the GCO.

In 2024 the Criminal Compliance Committee ceased its activities when the Board of Directors of Audax Renovables (through its delegated body, the Audit Committee) approved the appointment of the Group Compliance Officer. This new position is in charge of the management, control and supervision of the compliance model of the Group and its various subsidiaries. As a consequence of the implementation of the Compliance Model, the positions of Compliance Manager or Delegate or Compliance Officer were defined and established as local managers appointed for the implementation of the Model in each of the subsidiaries comprising the Company, who report to the GCO.

The Board of Directors delegates the supervision responsibilities to the Audit Committee which, through the Group Compliance Officer, carries out the monitoring and control of the Compliance Model and Internal Information System (Whistleblowing channel).

In order to supervise the implementation of and compliance with all these documents, the Group Compliance Officer, in cooperation with the Internal Audit Department, is responsible for submitting to the Audit Committee the questions related to the business conduct and legal compliance when applicable.

The members of the Board of Directors have extensive experience and expertise concerning the impacts, risks and opportunities related to business conduct in the activities of Audax. The members of the Board are also directors of other listed and unlisted companies, representing reliable sources of information about the management of business conduct matters in other businesses.

The Board is duly informed about arising or recurring topics of ethics and compliance, and their approval is necessary for implementing or achieving certain tasks, which affect the Compliance Model, such as questions related to business conduct, potential impacts related to the Model, the development and updating of policies related to business conduct, extraordinary technical/economic resources, among others. The Board is informed about topics related to business conduct and compliance through the Audit Committee and the Group Compliance Officer.

#### **Material impacts, risks and opportunities and their interaction with the strategy and business model (ESRS 2 SBM-3)**

The process of determining and evaluating material impacts, risks and opportunities related to business conduct has been carried out in accordance with the provisions of chapter 1.4 of ESRS 2 IRO-1: Description of the processes of determining and evaluating material impacts, risks and opportunities.

The conclusions of the double materiality assessment conducted in accordance with ESRS G1 - Business conduct establish as material the following topics and sub-topics related to client management:

ESRS	Topic	Sub-topic	Impact, Risk or Opportunity	IRO
G1	Business conduct	Corporate culture	Impact	Fostering corporate culture.
			Impact	Media exposure of the CEO and majority shareholder of the Group
			Risk	Risk of greenwashing of the actual impact of the business and its core activities
		Corruption and bribery	Risk	Not identifying irregular conduct because of the lack of confidence in the whistleblowing channel
			Risk	Risk of incidents related to corruption, bribery and/or fraud of the employees of the Group
		Management of the relations with suppliers including payment practices	Impact	Evaluation of suppliers implementing environmental and social criteria according to the CSDDD European Directive
			Risk	Third-party transactions.

#### Business conduct policies and corporate culture (G1-1)

The Group has in place the following policies related to business conduct and corporate culture, which address the identification, assessment, management or remediation of its impacts, risks and opportunities related to corporate culture, corruption and bribery and supplier management:

- **Corporate Code of Ethics and Conduct:** The document's purpose is to make known to all employees of the Group the values and general principles which ought to govern their work and professional activity. Another objective of the document is to help attain the goals set in the organisation's mission vision and values. The Code of Ethics contains, among others, the recommendations of good governance, of general recognition in the international markets, as well as the principles of social responsibility, such as the respect of fundamental rights and ethical commitments towards the environment and the suppliers.
- **Disciplinary Rules and Sanctions:** It sets out the disciplinary proceedings for non-compliance with the principles and actions outlined in the Corporate Code of Ethics and Conduct. The sanctions system featured in the collective agreement will also be applicable, together with the Spanish civil and criminal laws in force.
- **Compliance and Criminal Risk Prevention Handbook** of Audax Renovables and its group of companies: this document represents a firm commitment to supervising the compliance carried out by the Group of the management and prevention of criminal risks, which could affect it according to its activity and business sector, and especially after the consecutive amendments to the Spanish Criminal Code, the guidelines established in this aspect by the Spanish Public Prosecutor's Office and the ethical principles of corporate good governance.
- **Compliance and Criminal Risk Prevention Policy.** Within the framework of the Compliance Handbook mentioned before and in line with the Code of Ethics, the policy informs Audax Renovables' employees and third parties of the organisation's opposition to the commitment of any illicit, criminal or unlawful act.
- **Anti-corruption policy:** The Group has in place the Anti-corruption and Anti-bribery Policy, approved by the Board of Directors of Audax Renovables, S.A. on 24 February 2024. The purpose of this policy is to address the necessary compliance with the legal requirements concerning anti-corruption principles, management of the risk derived from any kind of corrupt business practice or any operation contrary to the good practice, in any of its forms, and to implement, among others, principle no. 10 of the UN Global Compact, established as one of the values within the Audax Renovables Group, among Directors, Significant Shareholders or other Related Persons (according to the definitions of these terms featured in the following paragraph).

- **Internal Information System Policy.** Initial design and approval of the Policy of Internal Information System and Informant Protection in accordance with Law 2/2023 of 20 February, on the protection of persons who report breaches of law and on fight against corruption.
- **Internal Information System Procedure.** It is the Procedure (replacing the previous Whistleblowing Channel Regulations), which updates in accordance with the requirements of Law 2/2023 of 20 February and regulates the protection of persons who report breaches of law and on fight against corruption.
- **Whistleblowing Channel.** It is a tool made available to the employees and business partners who wish to use it, in order to enable them to report irregularities or make enquiries. The reports can be submitted preferably through a platform designed for this purpose, accessed from the Employee Portal as well as through an external link available on the corporate website. The subsidiary in Hungary has its own reporting channel, which complies with all the requirements applicable to the Group's Whistleblowing Channel.
- **Non-retaliation protocol:** The Audax Group applies the principle of zero tolerance towards any kind of retaliation (including threats of and attempts at reprisals) against the whistleblowers who decide to report in good faith irregularities or infringements through the Internal Information System or to cooperate in the investigation of any report, and the Group shall make every effort to avoid, pursue and punish such conduct.

In order to oversee the implementation of and compliance with the aforementioned policies the Audit Committee monitors the activities of the compliance body. Moreover, and as a third line of defence, with regard to ensuring a greater control environment, the Internal Audit Department of Audax Renovables, also reporting to the Audit Committee, draws up annually its Annual Audit Plan, where its outlines the actions to be carried out during the year, including also the necessary audit activities of the compliance area.

As a result of the implementation process of the regulatory Compliance Model, the Group endeavours, and has been endeavouring in previous years, to establish the bases of special training in order to prevent and detect criminal offences resulting from the risk matrix.

#### **Fostering corporate culture**

The Group strives to promote the culture of information or communication ("speak up") among its stakeholders, both internal and external, encouraging and supporting the communication of any concerns about unethical conduct and/or infringements of regulations (internal and/or external) within the area of professional activity, and to guarantee the protection of the informant against any possible reprisals. For this purpose, the company organises training sessions on the principal internal policies and regulations in order to inform on the guidelines for prevention and detection of compliance risks and, particularly, of the criminal and corruption risks.

In 2024 the company tackled the subject of raising employee awareness regarding Compliance through a series of information and training campaigns for selected employees in order to strengthen the integrity and legal compliance and, consequently, foster and raise employee awareness of the importance of the principle of zero tolerance towards corruption and bribery, among other compliance risks, specifically, dedicating special material to the Gifts and Hospitality Policy, strictly derived from and connected with the Group's Anti-corruption and Anti-bribery Policy. The training sessions were approved by the Board through the Audit Committee as a part of the Compliance Training Plan 2024-2025.

## **Whistleblowing channel**

The need to protect the good reputation and prestige of Audax requires that all its employees, when acting on behalf of the Group, comply with applicable legislation, the Corporate Code of Ethics and Conduct and applicable internal policies and procedures.

In order to detect any conduct against the rules outlined above, Audax has established the Whistleblowing Channel, designed for the purpose of communicating possible irregularities or infringements, which could constitute a breach of law, of the Code of Ethics or its implementing provisions or of other internal applicable regulations; as well as for the purpose of submitting requests of explanation of specific doubts raised by the application or interpretation of applicable regulations, both external and internal, including doubts concerning the operation of the Channel or any other applicable rules.

The functions of the whistleblowing channel are outlined in the Internal Information System Procedure. Its purpose is to establish the principles, guidelines and functions of the Internal Information System, as well as to regulate the protocols and actions to be taken by the Internal Information System Manager as the body responsible for its management, assisted by the Criminal Compliance Committee in the processing of the enquiries and/or complaints received, always respecting the fundamental rights and duties of the persons who use it.

The Internal Information System and the Whistleblowing Channel of Audax are governed by the following principles:

- Legality and corporate ethics.
- Independence and impartiality
- Transparency and accessibility
- Traceability and security.
- Diligence and celerity
- Good faith.
- Respect for fundamental rights
- Prohibition of retaliation
- Confidentiality.
- Anonymity and personal data protection.

In 2024 the Whistleblowing Channel, which belongs to the Internal Information System (IIS) of the Group, received two reports at the Headquarters level. Both reports were duly analysed and evaluated by the Group Compliance Officer with the assistance of an independent external advisor, with due attention and respect for the guarantees of confidentiality, independence and impartiality, as per the Policy and Internal Procedure of the Internal Information System and the Group's Informant Protection.

The Group maintains its commitment to tackle every report with a review of the adequate and possible corrective measures in order to ensure the pertinent compliance by its stakeholders and, therefore, the whistleblowing channel is available from the corporate website to all the employees and third parties who may need it.

In 2024 the employees of the Italian subsidiary received specific training on the whistleblowing channel.

## **Compliance training**

The Group continues striving to establish the bases of special training to prevent and detect criminal offences resulting from the Corporate Risk Matrix. The Group Compliance Officer draws up annually a Compliance Training Plan as part of their annual Action Plan. The Training Plan was presented to the Board in July for its approbation.

In 2024 an information and training campaign was carried out, which consisted in launching and publishing on the Employee Portal of a series of training sessions on the function of the Compliance Officer, the whistleblowing channel and the gift policy, as well as a special webinar on the Compliance Model, designed for the Directors, Senior Managers, Managers and the positions identified by the Compliance Officer as the posts that are most at risk with regard to corruption.

## **Information on functions that are most at risk regarding corruption and bribery**

The training sessions on compliance matters are intended for groups of employees selected by the Compliance Officer and the local Compliance Officers based on the specific risks of their areas of responsibility. The group that are most exposed to risk and responsibility due to their position as guarantors are the Directors, the Senior Managers and the Managers of the company, as the positions of ultimate responsibility for the Compliance Model and for fostering the culture of risk prevention in their areas of responsibility.

The company has identified 27 positions whose functions are highly exposed to the risk related to corruption and/or bribery and, consequently, training sessions have been organised for those key posts.

### **Management of relationships with suppliers (G1-2)**

The Group strives for compliance with the Code of Ethics and Conduct throughout its supply chain, especially among its suppliers. Consequently, Chapter 7 of the Code of Ethics outlines the ethical principles, which govern the conduct of the suppliers of the Group's companies, and which should be expressly accepted by those suppliers before the beginning of their contractual relationship.

All the subsidiaries of the Group have in place a department and/or persons exclusively dedicated to the management of the relationships with suppliers. The Group's relationships with its suppliers are regulated through agreements, which include legal, environmental and social requirements that the third parties shall meet depending on the services rendered to the company.

Audax has not identified any risks or negative impacts related to the environment or any potential cases of infringement of human rights by its suppliers during the year 2024 nor in previous years. In 2024 no fines were imposed either for non-compliance with the law or regulations in social and economic field related to the Group's suppliers.

Most Audax's suppliers are located in Europe, where there is high regulatory pressure on the environment protection and on the defence of Human Rights. The company has not implemented any documented procedure of supplier evaluation based on social and environmental criteria and currently does not carry out audits of its suppliers. The main reasons are that it has not identified material risks or negative impacts in the areas related to the suppliers and the currently applicable laws do not impose on the company any obligation to implement such procedure. However, the Group shall strengthen its process of management and evaluation of its suppliers as a part of the necessary tasks for the purpose of adapting to the EU Corporate Sustainability Due Diligence Directive (CSDDD), whose entry into force is expected in 2026.

### **Prevention and detection of corruption and bribery (G1 -3)**

In recent years corruption has become a global problem, which not only stifles the economy and the markets, but also hinders the appropriate allocation of existing public resources, thus being one of the main obstacles to the social and economic development. Therefore, the Group pays special attention to corruption and bribery offences, as well as to any and all corruption-related risks and the results of changes in applicable legislation.

Audax is part of the United Nations Global Compact since 2013 and in its adherence to the tenth principle it makes every effort to continue its commitment to fight against corruption in all its forms. The organisation rejects the use of any practices, offers or requests of illicit payments, monetary or otherwise, for the purpose of obtaining benefits in its relations with the interested parties.

The Group has in place the Anti-corruption and Anti-bribery Policy, approved by the Board of Directors in the first quarter of 2024. The policy aims to provide the company with a framework for meeting the anti-corruption legal requirement, managing the risk derived from any type of corrupt business practice or any operation contrary to the Code of Ethics, in any of its forms. The Policy establishes and defines the situations of risk or red flags, the prohibited conducts, the actions to foster compliance with the Policy, the roles of responsibility adopted by the different bodies and the elements that comprise the organisation in Audax (with regard to Governance), the Internal Information System made available to report infringements of anti-corruption and anti-bribery regulations and the management of such reports, the information and instruction on the Policy and its disciplinary measures.

The Code of Ethics features a commitment to the rules of transparency and business ethics and extends it to its suppliers in order to prevent any form of corruption and/or bribery. Audax Renovables has implemented various mechanisms, processes and measures to prevent, detect and address reports or incidents of corruption or bribery, such as for example: the contract validation handbook, bank reconciliation, delivery contract model, disclosure of public administration delivery contract terms, internal processes of cash and bank accounts management, digital certificates of electricity and gas purchases, forecast of income from energy retailing and price hedging contracts, among others. These documents and controls establish and put into practice the organisation's key measures for mitigating the risk of potential corrupt conduct of its members.

In the case of detecting incidents related to or justified suspicions of potential cases of corruption and/or bribery, such information shall be communicated immediately to the superior, to the Group Compliance Officer or through the Whistleblowing Channel in order to initiate the investigation of the case.

Upon conducting the relevant investigation, if any corruption case is confirmed, the information shall be reported to the General Management and to the Audit Committee, who shall communicate it to the Board of Directors on their next extraordinary session if required.

#### **Anti-corruption and anti-bribery training**

In order to ensure the compliance with the Anti-corruption and Anti-bribery Policy, the organisation disseminates the Policy as widely as possible among the Board of Directors, managers and employees. The company informs the employees on the policy through the Employee Portal and requires that they read it and sign it. The Policy is made available to the stakeholders through the corporate website.

In 2024 the company continued engaged in raising awareness among the employees in topics of Compliance through information and training campaign in order to strengthen the integrity and legal compliance and thus promote and raise employees' awareness of importance of the principle of zero tolerance towards corruption and bribery. The training sessions are included in the Compliance Training Plan 2024-2025 drawn up by the Group Compliance Officer, and various of these sessions were conducted in 2024.

The training offered in 2024 addressed criminal compliance and corporate conduct. A special session was dedicated to the directors, senior managers and managers of the Audax Group on criminal compliance and the most significant risks, including corruption risk. Training sessions have been also organised concerning corporate conduct, principles and values that the employees in functions at risk, middle management and leadership should apply in their everyday activities. The percentage of functions at risk covered by the training on Compliance is 3.5% of the total number of employees.

Moreover, as a part of the onboarding process of the company, the employees receive information sessions on ant-corruption, organised by the Group Compliance Officer, the Sustainability Manager and the Group Risk Officer.

## Anti-corruption and anti-bribery training<sup>22</sup>

Anti-corruption training	Functions at risk	Management	Other employees
<b>Scope of the training</b>			
Number of employees	27	12	325
Number of trained employees	27	12	325
<b>Method and duration</b>			
Classroom training			
Computer-based training	x	x	x
Voluntary computer-based training			
<b>Frequency</b>			
Required frequency of training	Yearly	Yearly	Yearly
<b>Subjects covered</b>			
Corruption definition	x	x	x
Policy	x	x	x
Procedures in case of suspicion or detection	x	x	x
Other (please specify)	Gifts and Hospitality	Gifts and Hospitality	Gifts and Hospitality

### Incidents of corruption or bribery (G1-4)

The Group has not been sanctioned, and no legal claims have been brought against it on incidents related to corruption or bribery in none of its subsidiaries in 2024,

### Political influence and lobbying activities (G1-5)

Audax Renewables did not make any political contributions in 2024 nor in previous years.

The Group does not make political contributions or donations; however it respects social and public activity of its employees. The Anti-corruption Policy of the company establishes the prohibition of making donations to political parties and their related foundations. The Corporate Code of Ethics of the Group also states that any relationship, membership or collaboration of the employees of the Group with political parties or other kind of public-purpose entities, institutions or associations shall be carried out in a private capacity, thus avoiding any relation to the Group and/or its subsidiary companies.

None of the members of the administrative, management and supervisory bodies has held a position in public administration comparable to their appointment and the company is not registered in the EU Transparency Register.

### Corporate lobbying activities

The Dutch subsidiary *Audax Renewables Nederland B.V.*, is the only subsidiary of the Group which carries out corporate lobbying activities. The company is member of the *Energie-Nederland*, the largest industrial association of the Netherlands, which is an alliance of all the producers, suppliers and retailers of electricity, gas and heat. *Energie-Nederland* represents practically all the energy market of the Netherlands and has 80 members engaged in renewable and non-renewable energy. The objective of the association is to defend the interests of its members in all the areas of energy supply in The Hague (the capital city of the Netherlands) and Brussels, from production and retail of the energy to supply to the consumers and businesses.

The total amount paid for the affiliation to *Energie-Nederland* in 2024 was €37,538.

Audax is also member of other organisations, such as Red Española del Pacto Mundial, AESE or AEE (Asociación Empresarial Eólica), but does not carry out lobbying activities in any of these associations. The objective of these alliances is to keep up with the trends and updates of the regulations, energy efficiency and changes in the sector, among others.

<sup>22</sup> The information disclosed covers the subsidiaries located in Spain.

### Payment practices (G1-6)

The company manages payments to suppliers in an efficient and transparent way, making sure to meet the agreed payment terms. The company applies the same payment terms to all its providers, whether these are small, medium or large companies.

The average period of payment to suppliers in Spain refers to Law 15/2010 which establishes measures against delayed payment in business transactions, as well as the modifications established in Law 18/2022, of 28 September, on business creation and development.

	2024	2023
Average term of payment to suppliers (days)	38	35

	2024	2023
Percentage of the total of invoices paid within 30 days	99%	94%

For the rest of the countries, as there is no legal obligation to disclose the information, no standardised methodology of calculation of the average terms of payment has been developed, and the company is engaged in developing a common criteria of information disclosure.

With regard to legal proceedings currently outstanding for late payment, the company informs that the subsidiary located in Poland has a legal proceeding currently outstanding initiated by one of its energy suppliers, which was resolved in favour of the claimant on 13 June 2024, at which date Audax was required to pay the amount claimed for delays in business transactions under agreement.

## 5. Appendices

### 5.1 List of data points included in regulations derived from other EU legislation

Disclosure requirement and related data point	Page	Regulation on sustainability-related disclosures in the financial services sector reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS 2 GOV-1 Board's gender diversity (paragraph 21 (d))	5	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 (e)	5			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 GOV-1 Statement on due diligence paragraph 30	8	Indicator number 10 of Table #3 of Annex 1			
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i)	9	Indicator number 4 of Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on environmental risk and Table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii)	N/A.	Indicator number 9 of Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii)	N/A.	Indicator number 14 of Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv)	N/A.			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14	N/A.				Regulation (EU) 2021/1119, Article 2(1)
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)	N/A.		(a), Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1 Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2	
ESRS E1-4 GHG emission reduction targets paragraph 34	N/A.	Indicator number 4 of Table #2 of Annex 1	Article 449(a) of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3 Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6	
ESRS E1-5 Energy consumption from fossil sources, disaggregated by sources (only high climate impact sectors) paragraph 38	36	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1			
ESRS E1-5 Energy consumption and mix paragraph 37	36	Indicator number 5 of Table #1 of Annex 1			
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	36	Indicator number 6 of Table #1 of Annex 1	Article 449 bis; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5 (1), 6 and 8(1)	
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	36	Indicator number 1 and 2 of Table #1 of Annex 1			
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	36	Indicator number 3 of Table #1 of Annex 1	Article 449 bis of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)	
ESRS E1-7 GHG removals and carbon credits paragraph 56	40				Regulation (EU) 2021/1119, Article 2(1)
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66	N/A.			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)	N/A.		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book. Climate change physical risk: exposures subject to physical risk		
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)					
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)	N/A.		Article 449bis of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral		
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69	N/A.			Delegated Regulation (EU) 2020/1818, Annex II	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Non-material	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1			
ESRS E3-1 Water and marine resources paragraph 9	Non-material	Indicator number 7 of Table #2 of Annex 1			
ESRS E3-1 Dedicated policy paragraph 13	Non-material	Indicator number 8 of Table #2 of Annex 1			
ESRS E3-1 Sustainable oceans and seas paragraph 14	Non-material	Indicator number 12 of Table #2 of Annex 1			

ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Non-material	Indicator number 6.2 of Table #2 of Annex 1	
ESRS E3-4 Total water consumption in m 3 per net revenue on own operations paragraph 29	Non-material	Indicator number 6.1 of Table #2 of Annex 1	
ESRS 2- IRO 1 - E4 paragraph 16 (a) i)	N/A.	Indicator number 7 of Table #1 of Annex 1	
ESRS 2- IRO 1 - E4 paragraph 16 (b)	N/A.	Indicator number 10 of Table #2 of Annex 1	
ESRS 2- IRO 1 - E4 paragraph 16 (c)	N/A.	Indicator number 14 of Table #2 of Annex 1	
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Non-material	Indicator number 11 of Table #2 of Annex 1	
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Non-material	Indicator number 12 of Table #2 of Annex 1	
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Non-material	Indicator number 15 of Table #2 of Annex 1	
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Non-material	Indicator number 13 of Table #2 of Annex 1	
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Non-material	Indicator number 9 of Table #1 of Annex 1	
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Non-material	Indicator number 13 of Table #3 of Annex I	
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Non-material	Indicator number 12 of Table #3 of Annex I	
ESRS S1-1 Human rights policy commitments paragraph 20	49	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex I	
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 21	49		Delegated Regulation (EU) 2020/1816, Annex II
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Non-material	Indicator number 11 of Table #3 of Annex I	
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	49	Indicator number 1 of Table #3 of Annex I	
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	50	Indicator number 5 of Table #3 of Annex I	
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	56	Indicator number 2 of Table #3 of Annex I	Delegated Regulation (EU) 2020/1816, Annex II
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	77	Indicator number 3 of Table #3 of Annex I	
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	56	Indicator number 12 of Table #1 of Annex I	Delegated Regulation (EU) 2020/1816, Annex II
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	56	Indicator number 8 of Table #3 of Annex I	
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	57	Indicator number 7 of Table #3 of Annex I	
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	57	Indicator number 10 Table #1 and Indicator number 14 Table #3 of Annex I	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12(1), Annex II
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Non-material	Indicator number 1 and 13 of Table #3 of Annex I	
ESRS S2-1 Human rights policy commitments paragraph 17	Non-material	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1	
ESRS S2-1 Human rights policy commitments paragraph 17	Non-material	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1	
ESRS S1-1 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 19	Non-material	Indicator number 10 of Table #1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12(1)
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 19	Non-material		Delegated Regulation (EU) 2020/1816, Annex II
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Non-material	Indicator number 14 of Table #3 of Annex 1	
ESRS S3-1 Human rights policy commitments paragraph 16	Non-material	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1	
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	Non-material	Indicator number 10 of Table #1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12(1)
ESRS S3-4 Human rights issues and incidents paragraph 36	Non-material	Indicator number 14 of Table #3 of Annex 1	
ESRS S4-1 Policies related to consumers and end-users paragraph 16	59	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1	
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	59	Indicator number 10 of Table #1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12(1)
ESRS S4-4 Human rights issues and incidents paragraph 35	60	Indicator number 14 of Table #3 of Annex 1	
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	64	Indicator number 15 of Table #3 of Annex 1	
ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	64	Indicator number 6 of Table #3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II

ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	69	Indicator number 17 of Table #3 of Annex 1
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	69	Indicator number 16 of Table #3 of Annex 1

## 5.2 Disclosure of information under Law 11/2018

### 5.2.1 Tax information

Tax information of Audax Renovables for the year 2024 is presented below:

#### Consolidated earnings before tax

Country	2024	2023
Spain	€5,489,383	€-4,766,194
Italy	€11,059,979	€2,312,353
The Netherlands	€30,081,949	€26,584,167
Portugal	€1,999,294	€444,098
Poland	€407,237	€270,687
Germany	€-3,449,183	€-5,380,910
France	€1,035,921	€190,741
Hungary	€13,937,531	€9,374,903

#### Income tax paid

Country	2024	2023
Spain	1,308,575	€4,147,441
Italy	1,897,853	€1,223,953
The Netherlands	8,416,456	€9,872,712
Portugal	870,534	€218,701
Poland	423,731	€742,968
Germany	0	€0
France	57,104	€66,605
Hungary	7,011,163	€0

#### Public subsidies received

Audax Renovables did not receive public subsidies in 2024.

#### Other economic contributions

The Group has cooperated with the following non-profit associations and organisations

NGO or non-profit association	Country
El sueño de Vicky	Spain
Fundación Esclerosis Múltiple (fem)	Spain
Asociación AfAB	Spain
Fundación Adana	Spain
Aosciación Afanoc Niños con cáncer	Spain
Fundación Ricky Rubio	Spain
Instituto Guttmann	Spain
Fundación Alzheimer Cataluña	Spain
Amigos de los mayores	Spain
Aprenem autisme	Spain
Aspanoa Niños con Cáncer	Spain
Fundación el Somni dels Nens	Spain
Asociación Alfabetics 60	Spain
Asociación Cordobesa de Esclerosis Múltiple	Spain
Asociación Adevida	Spain
Asociación Redmadre Córdoba	Spain
Cofradía de Nuestra Señora del Campo	Spain
Hintalovon Gyermekjogi Alapítvány	Hungary

## 5.2.2 Information on own workforce<sup>23</sup>

The Group has ended the year 2024 with a total of 783 employees, of which 59% are women and 41% are men, employed by the different subsidiaries. In comparison to the previous year, there has been no significant change of the number of employees. In 2023 the staff comprised 755 employees, of which 60% were women.

The following table shows the breakdown of employees by country, age, gender, professional category, type of employment contract and work time:

### Employees by gender

Gender	2024	2023
Men	319	300
Women	464	455
<b>Total</b>	<b>783</b>	<b>755</b>

### Employees by professional category and gender:

Professional category	2024		2023	
	Men	Women	Men	Women
Senior Management	2	1	2	1
Management	25	7	18	5
Leadership	14	7	18	6
Middle Management	31	38	34	35
Others	247	411	228	408
<b>Total</b>	<b>319</b>	<b>464</b>	<b>300</b>	<b>455</b>

### Employees by age and gender:

Age	2024		2023	
	Men	Women	Men	Women
Under 30	52	49	42	55
Between 30 and 50	206	355	205	349
Over 50	61	60	53	51
<b>Total</b>	<b>319</b>	<b>464</b>	<b>300</b>	<b>455</b>

### Employees by country and gender:

Country	2024		2023	
	Men	Women	Men	Women
Spain	163	207	152	212
Hungary	40	143	39	130
The Netherlands	76	33	71	34
Italy	19	30	14	30
Portugal	9	24	10	27
Poland	9	23	8	20
Germany	3	4	6	2
<b>Total</b>	<b>319</b>	<b>464</b>	<b>300</b>	<b>455</b>

<sup>23</sup> The information disclosed on own workforce represents 96.6% of the employees of the Group.

#### Breakdown of employees by type of contract, gender, age, professional category and country<sup>24</sup>

In line with the commitment to create stable and quality employment, the Group encourages indefinite employment contracts for professionals. As at 31 December 2024, 95% of the employees had indefinite contracts, while only 5% were temporary employees.

##### Employees by type of contract and gender:

Type of contract and gender	2024	2023		
	Men	Women	Men	Women
Indefinite	298	446	266	410
Fixed-term	21	18	34	45
<b>Total</b>	<b>319</b>	<b>464</b>	<b>300</b>	<b>455</b>

##### Employees by type of contract and age:

Type of contract and gender	2024	2023		
	Indefinite	Fixed-term	Indefinite	Fixed-term
Under 30	84	17	66	31
Between 30 and 50	541	20	511	43
Over 50	119	2	99	5
<b>Total</b>	<b>744</b>	<b>39</b>	<b>676</b>	<b>79</b>

##### Employees by type of contract and professional category:

Type of contract and professional category	2024	2023		
	Indefinite	Fixed-term	Indefinite	Fixed-term
Senior Management	3	0	3	0
Management	32	0	23	0
Leadership	20	1	24	0
Middle Management	69	0	68	1
Others	620	38	558	78
<b>Total</b>	<b>744</b>	<b>39</b>	<b>676</b>	<b>79</b>

##### Employees by type of contract and country:

Type of contract and professional category	2024	2023		
	Indefinite	Fixed-term	Indefinite	Fixed-term
Spain	364	6	353	11
Hungary	182	1	166	3
The Netherlands	81	28	74	31
Italy	47	2	41	3
Portugal	32	1	14	23
Poland	32	0	20	8
Germany	6	1	8	0
<b>Total</b>	<b>744</b>	<b>39</b>	<b>676</b>	<b>79</b>

<sup>24</sup> The company informs on the number and breakdown of contracts at the close of the year because the difference between the median and the number of contracts at the close of the year is lower than 5%.

## Dismissals

In 2024 a total number of 50 dismissals took place in the organisation, compared to 54 in the previous year). The following table shows the number of dismissals by gender, age and professional category:

### Dismissals of employees by age and gender:

Age	2024		2023	
	Men	Women	Men	Women
Under 30	5	2	8	8
Between 30 and 50	11	25	15	17
Over 50	3	4	4	5
<b>Total</b>	<b>19</b>	<b>31</b>	<b>27</b>	<b>27</b>

### Dismissals of employees by age and professional category<sup>25</sup>

Professional category	2024	
	Men	Women
Senior Management	0	0
Management	0	0
Leadership	0	0
Middle Management	1	2
Others	18	29
<b>Total</b>	<b>19</b>	<b>31</b>

## Employees' remuneration

### Remuneration of the Board of Directors (in € thousand)

The table below shows the average remuneration of the Board of Directors and the employees by category, age, country and gender in comparison to the previous year

Gender	2024		2023	
	Members	Remuneration	Members	Remuneration
Men	3	918	4	940
Women	2	391	2	344
<b>Total</b>	<b>5</b>	<b>1,309</b>	<b>5</b>	<b>1,284</b>

### Senior Management's remuneration<sup>26</sup>:

	2024	2023
<b>Total</b>	€194,411	€132,500

### Employees' remuneration by gender<sup>27</sup>:

Gender	2024	2023
Men	€43,785	€39,064
Women	€26,215	€23,165
<b>Total</b>	<b>€33,373</b>	<b>€29,419</b>

<sup>25</sup> No information is provided on the situation of the previous year due to difficulties in obtaining historical data.

<sup>26</sup> No information is provided on the remuneration of senior management by gender due to confidentiality.

<sup>27</sup> Due to the different criteria used for the calculation of the remuneration during this year from the ones used the previous year, it is not possible to compare the data.

**Employees' remuneration by professional category and gender<sup>28</sup>:**

2024		
Professional category	Men	Women
Management	€145,788	€85,513
Leadership	€81,035	€67,861
Middle Management	€43,278	€36,794
Others	€32,586	€23,403
<b>Total</b>	<b>€43,785</b>	<b>€26,215</b>

**Average remuneration by country and professional category:**

2023				
Country	Management	Leadership	Middle Management	Others
Spain	€143,075	€86,498	€36,322	€17,532
Portugal	-	-	€22,400	€13,124
The Netherlands	€143,764	€63,840	€45,525	€43,407
Poland	€60,267	-	€28,627	€20,431
Hungary	€82,199	€57,453	€29,905	€15,529
Italy	-	€165,880	€31,570	€26,099
Germany	-	-	€36,077	€31,030

**Employees' remuneration by age and gender<sup>29</sup>:**

2024		
Age	Men	Women
Under 30	€24,273	€21,285
Between 30 and 50	€43,982	€26,833
Over 50	€59,752	€26,590
<b>Total</b>	<b>€43,785</b>	<b>€26,590</b>

**Average remuneration by age and country:**

2023			
Country	< 30 years	30-50 years	>50 years
Spain	€21,958	€30,978	€30,435
Portugal	€12,512	€16,198	€15,584
The Netherlands	€26,779	€50,024	€60,382
Poland	€18,004	€23,853	€45,729
Hungary	€15,774	€18,070	€20,878
Italy	€24,599	€43,105	€35,728
Germany	-	€56,101	€34,196

<sup>28 29 30</sup> Due to the different criteria used for the calculation of the remuneration during this year from the ones used the previous year, it is not possible to compare the data.

#### Employees' remuneration by country and gender:

Country	2024	2023		
	Men	Women	Men	Women
Spain	€36,796	€27,059	€36,578	€25,231
Hungary	€30,824	€20,486	€24,958	€16,153
The Netherlands	€64,133	€44,989	€52,972	€38,495
Italy	€62,873	€32,672	€50,248	€27,006
Portugal	€17,944	€17,447	€14,956	€14,980
Poland	€42,826	€26,626	€35,036	€23,680
Germany	€40,302	€34,301	€56,189	€34,109
<b>Total</b>	<b>€43,785</b>	<b>€26,215</b>	<b>€38,705</b>	<b>€25,665</b>

#### Accident and absenteeism rates

The aim of the implementation of all these measures is to reduce to the minimum the accidents at work. The Group has never had to mourn any lives lost since the beginning of its activity.

2024	2023	
Accident and absenteeism rates	Men	Women
No. of work accidents with sick leave	N/A.	3
No. of days lost due to work accidents with sick leave	N/A.	112
Frequency rate	N/A.	18.83
Severity rate	N/A.	0.7
Hours of absenteeism	49,700	40,214

#### Employees' training

Audax Renovables' success is the result of the work, commitment and professionalism of its team. Therefore, the Company promotes policies and schemes of professional development directed to its employees.

In 2024 the Group continued offering a programme of continuing training to its employees in order to ensure that the staff had the necessary skills to assume the responsibilities and carry out the tasks associated with their positions and, at the same time, develop new skills, which would enable them to grow personally and professionally.

We would like to highlight the following courses conducted in 2024:

- **English:** In order to improve internal communication among the Group's subsidiaries and with the Group's stakeholders, English courses have been offered to all the interested employees. Currently more than 100 employees participate in weekly English lessons.
- **Compliance:** Training sessions determined in the Compliance Training Plan were organised.
- **Cybersecurity and data management:** 6 courses concerning these topics were conducted in various subsidiaries of the Group.
- **Courses on ORP (Occupational Risk Prevention) in the construction sector:** The courses included basic training in the necessary prevention topics in the construction sector. Necessary training to be able to go to the construction site.

The training programme is not limited to the obligatory courses but is aimed at including the specific needs of the employees. Therefore, all the subsidiaries of the Group have internal processes for the purpose of requesting specific training related to a specific job position.

The following table shows the total number of hours of training of the employees by professional category and gender:

<b>Hours of training</b>	<b>2024</b>		<b>2023</b>	
	<b>Men</b>	<b>Women</b>	<b>Men</b>	<b>Women</b>
Senior Management	92	56	33	187
Management	121	143	271	813
Leadership	381	282	229	1454
Middle Management	493	909	489	613
Others	2,747	4,504	3,421	2,923
<b>Total</b>	<b>9,728</b>		<b>10,431</b>	

### 5.3 Taxonomy indicators

Template: Proportion of the turnover of goods or services associated to Taxonomy-aligned activities - disclosure for the year 2024 (Regulation 2021/2178)

Fiscal year 2024	Year	Substantial contribution criteria										Criteria of no harm ('Do not cause significant harm').							Category of transitional activity	Category of enabling activity	Proportion of Taxonomy-aligned (A.1.) or Taxonomy-eligible (A.2.) Turnover, year 2023		
		Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Water	Pollution	Climate change mitigation	Climate change adaptation	Water	Pollution	Climate change mitigation	Climate change adaptation	Water	Pollution	Biodiversity					
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																							
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																							
Electricity generation through solar photovoltaic technology	CCM 4.1	7,137,053	0.4%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	S	0.3%					
Electricity generation from wind energy	CCM 4.3	13,460,349	0.7%	S	N/EL	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	S	0.6%					
<b>Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		<b>20,597,402</b>	<b>1.0%</b>	<b>1.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>S</b>	<b>S</b>	<b>S</b>	<b>S</b>	<b>S</b>	<b>S</b>	<b>S</b>	<b>S</b>	<b>0.9%</b>					
Of which: enabling		0.00	0.0%	0.0%															0%	F			
Of which: transitional		0.00	0.0%	0.0%															0%	T			
<b>A.2. Taxonomy-eligible, but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																							
Installation, maintenance and repair of instruments and devices for measurement and control of the energy efficiency in buildings.	CCM 7.5	9,115	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										-				
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	128,009	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										-				
<b>Turnover of Taxonomy-eligible, but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		<b>137,124</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>				
<b>A. Turnover of Taxonomy-eligible activities (A.1+A.2)</b>		<b>20,734,526</b>	<b>1.0%</b>	<b>1.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.9%</b>					
<b>A. ACTIVITIES THAT ARE NOT TAXONOMY-ELIGIBLE</b>																							
Turnover of not Taxonomy-eligible activities (B)		1,959,290,842	99%																				
<b>TOTAL</b>		<b>1,980,025,368</b>	<b>100%</b>																				

<b>Proportion of Net Turnover/Total Net Turnover</b>		
	Taxonomy-aligned by objective	Taxonomy-eligible by objective
CCM	1.0%	1.0%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
CE	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

Template: Proportion of CapEx of goods or services associated to Taxonomy-aligned activities - disclosure for the year 2024 (Regulation 2021/2178)

Fiscal year 2024	Year	Proportion of CapEx, year 2024	Substantial contribution criteria										Criteria of no harm ('Do not cause significant harm').		Category of transitional activity	Category of enabling activity	Proportion of Taxonomy-aligned (A.1) or Taxonomy-eligible (A.2) CapEx, year 2023			
			Biodiversity	Circular economy	Pollution	Water	Adaptation to climate change	Climate change mitigation	Biodiversity	Circular economy	Pollution	Water	Adaptation to climate change	Climate change mitigation						
Economic activities														Minimum safeguards						
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																				
Electricity generation through solar photovoltaic technology	CCM4.1	49,322,981	82.4%	S	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	64.0%					
Electricity generation from wind energy	CCM4.3	103,742	0.2%	S	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	0.9%					
<b>CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		<b>49,426,723</b>	<b>82.6%</b>	<b>83.3%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>							<b>64.9%</b>					
Of which: enabling		0.0	0.0%	0.0%											0%	F				
Of which: transitional		0.0	0.0%	0.0%											0%	T				
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																				
Transport by motorbikes, passenger cars and light commercial vehicles	CCM6.5	111,059	0.2%	EL	N/EL	N/EL	N/EL	N/EL							-					
Installation, maintenance and repair of instruments and devices for measurement and control of the energy efficiency in buildings	CCM7.5	0.0	0.0%	EL	N/EL	N/EL	N/EL	N/EL							-					
Installation, maintenance and repair of renewable energy technologies	CCM7.6	0.0	0.0%	EL	N/EL	N/EL	N/EL	N/EL							-					
Conservation, including habitat restoration, of ecosystems and species	CCM1.1	0.0	0.0%	N/EL	N/EL	N/EL	N/EL	N/EL	EL						-					
<b>CapEx of Taxonomy-eligible, but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		<b>111,059</b>	<b>0.2%</b>	<b>0.2%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>							<b>0.0%</b>					
<b>A. CapEx of Taxonomy-eligible activities (A.1+A.2)</b>		<b>49,537,782</b>	<b>82.8%</b>	<b>83.5%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>							<b>64.9%</b>					
<b>A. ACTIVITIES THAT ARE NOT TAXONOMY-ELIGIBLE</b>																				
CapEx of not Taxonomy-eligible activities (B)		10,307,218	17.2%																	
<b>TOTAL</b>		<b>59,397,000</b>	<b>100%</b>																	

<b>Proportion of CapEx/total CapEx</b>		
	Taxonomy-aligned by objective	Taxonomy-eligible by objective
CCM	82.6%	82.8%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
CE	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

*Template: Proportion of OpEx of goods or services associated to Taxonomy-aligned activities - disclosure for the year 2024 (Regulation 2021/2178)*



<b>Proportion of OpEx/total OpEx</b>		
	Taxonomy-aligned by objective	Taxonomy-eligible by objective
CCM	46.2%	46.2%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
CE	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

**Template: Nuclear and fossil gas related activities (Delegated Regulation 2022/1214)**

**Nuclear energy related activities**

The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle. No

The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies. No

The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades. No

**Fossil gas related activities**

The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. No

The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. No

The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels. No

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## 5.5 List of requirements under Law 11/2018 on non-financial information and diversity

### List of contents required by Law 11/2018

Information required by Law 11/2018	Materiality	Page of the report where the item is addressed	Reporting criterion: Selected GRI and ESRS
<b>GENERAL INFORMATION</b>			
Brief description of the business model including its business environment, organisation and structure	Material	5	ESRS 2 MDR-P ESRS 2 GOV-1
Markets where it operates	Material	7	ESRS 2 GOV-2
Objectives and strategies of the organisation	Material	9	ESRS 2 SBM-1
Main factors and trends, which may affect its future development	Material	12 14 64	ESRS 2 SBM-2 ESRS 2 SBM-3 G1-1
Materiality principle	Material	17 22 11	ESRS 2 IRO-1 ESRS 2 IRO-2 ESRS 2 SBM-3 ESRS 2 MDR-P
<b>Management approach:</b> description and results of the policies related to these issues, as well as the main risks related to these issues connected with the group's activity	Material	35 43 49 59 64	E1-2 E4-2 S1-1 S4-1 G1-1
<b>ENVIRONMENTAL ISSUES</b>			
<b>Detailed general information</b>			
Detailed information on current and expected impacts of the company's activities on the environment and, if applicable, on health and safety	Material	17	ESRS 2 IRO-1
Environmental assessment or certification procedures	Material	35 44	ESRS 2 MDR-A E1-3 E4-3
Environmental risk prevention means	Material	35 44	ESRS 2 MDR-A E1-3 E4-3
Application of precautionary principle	Material	35 44	ESRS 2 MDR-A E1-3 E4-3
Quantity of environmental risk provisions and guarantees	Material	35 44	ESRS 2 MDR-A E1-3 E4-3
<b>Pollution</b>			
Measures to prevent, reduce or repair emissions seriously affecting the environment, taking into account any form of pollution specific to the activity, including noise and light pollution.	Non-material	N/A.	N/A.
<b>Circular economy and waste prevention and management</b>			
Measures to prevent, recycle, reuse, recover and eliminate waste	Non-material	N/A.	N/A.
Actions to combat food waste	Non-material	N/A.	N/A.
<b>Sustainable use of resources</b>			
Water consumption and water supply within local limits	Non-material	N/A.	N/A.

Raw material consumption and measures adopted to improve material efficiency	Non-material	N/A.	N/A.
Energy consumption - direct and indirect	Material	36	E1-5
Measures adopted to improve energy efficiency	Material	35	ESRS 2 MDR-A E1-3
Use of renewable energy	Material	36	E1-5
<b>Climate change</b>			
Greenhouse gas emissions generated as a result of the company's activity, including use of goods and services it produces	Material	36	E1-6
			ESRS 2 MDR-A
Measures taken to adapt to the consequences of climate change	Material	34	E1-1
		35	E1-3
		40	E1-7
			E1-8
Medium and long-term voluntary reduction goals to reduce greenhouse gas emissions, and measures adopted for that purpose	Material	34	ESRS 2 MDR-T E1-1
		35	E1-4
<b>Biodiversity protection</b>			
Measures taken to preserve or restore biodiversity	Material	44	ESRS 2 MDR-A E4-3
Impacts made by activities or operations on protected areas	Material	45	E4-5
<b>EU Taxonomy</b>			
EU Taxonomy indicators concerning eligibility	Material	81	N/A.
<b>SOCIAL ISSUES AND MATTERS CONCERNING PERSONNEL</b>			
<b>Employment</b>			
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Total number and distribution of types of employment contracts and annual average of indefinite-term contracts, fixed-term contracts and part-time contracts by gender, age and professional category	Material	76	GRI 2-7 (2021) regarding employees by type of employment contract, by gender
Number of dismissals by gender, age and professional category	Material	77	S1-6 GRI 3-3 (2021)
Average remuneration and its development, according to gender, age and professional category or similar	Material	77	S1-16 GRI 3-3 (2021)
Pay gap, remuneration of equal work posts or of company average	Material	56	S1-16 GRI 3-3 (2021)
Average remuneration of directors and managers, including variable remuneration, allowances, compensations, payments to long-term saving and retirement plans and any other payment, distributed by gender	Material	77	S1-16 GRI 3-3 (2021)
Implementation of policies for disconnecting from work	Material	49	ESRS 2 MDR-P S1-1
Number of employees with disability	Material	56	S1-12
<b>Work organisation</b>			
Organisation of working time	Material	49	ESRS 2 MDR-P S1-1

Mechanisms and processes that the company has in place to promote the involvement of the employees in the management of the company, in terms of information, consultation and participation	Material	51	S1-3
Number of hours of absenteeism	Material	79	GRI 3-3 (2021) S1-14
Measures designed to help conciliation between work and family life and encourage co-responsible use of the rights by both parents	Material	52 53 56	ESRS 2 MDR-T ESRS 2 MDR-A S1-4 Measures S1-5 Targets S1-15
<b>Health and safety</b>			
Workplace health and safety conditions	Material	55 56	S1-11 S1-14
Work accidents, in particular, its frequency and severity, as well as occupational diseases; itemised by gender	Material	79	GRI 403-9 regarding accidents number and rate GRI 403-10 regarding work-related ill health and occupational diseases S1-14
<b>Social relations</b>			
Organization of social dialogue, including procedures of information, consultation and negotiation with employees	Material	50	S1-2
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Percentage of employees covered by collective agreement, by country	Material	55	S1-8
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<b>Training</b>			
Policies implemented in the area of training	Material	79	ESRS 2 MDR-P S1-1
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<b>Universal accessibility</b>			
Universal accessibility for persons with disabilities	Material	52 56	ESRS 2 MDR-A S1-4 S1-12
<b>Equality</b>			
Measures adopted in order to promote equal treatment and equal opportunities for women and men	Material	52 53	ESRS 2 MDR-T ESRS 2 MDR-A S1-4 S1-5
Equality plans, measures taken to promote employment, protocols against sexual and gender harassment	Material	49 52	ESRS 2 MDR-P S1-1 S1-4 S1-5
Policy against any type of discrimination and, if applicable, diversity management	Material	49	ESRS 2 MDR-P S1-1
<b>RESPECT FOR HUMAN RIGHTS</b>			
<b>Application of due diligence procedures</b>			

Application of due diligence procedures in the areas of human rights and prevention of the risk of human rights violation and, if applicable, measures to mitigate, manage and repair possible infringements committed	Material	8 60 61	ESRS 2 GOV 4 S1-3 S4-4
Complaints about cases of human rights violation	Material	57	S1-17
Measures implemented for the purpose of promotion and compliance with the provision of the ILO fundamental conventions related to the freedom of association and the right to collective bargaining, elimination of discrimination in employment and occupation, abolition of forced labour, and effective abolition of child labour	Material	49	ESRS 2 MDR-P S1-1
<b>FIGHT AGAINST CORRUPTION AND BRIBERY</b>			
Measures adopted to prevent corruption and bribery	Material	67	G1-3
Measures designed to fight money laundering	Material	67	G1-3
Contributions to foundations and non-for-profit entities	Material	74	GRI 2-28 (2021)
<b>SOCIAL INFORMATION</b>			
<b>Company commitment to sustainable development</b>			
The impact of the company's activity on local employment and development	Non-material	N/A.	N/A.
The impact of the company's activity on local communities and areas	Non-material	N/A.	N/A.
Relations and modalities of dialogue with members of local communities	Non-material	N/A.	N/A.
Association or patronage activities	Non-material	N/A.	N/A.
<b>Subcontracting and suppliers</b>			
Including social, gender equality and environmental issues in the procurement policy	Material	67	G1-2
Recognising own social and environmental responsibility in relations with suppliers and subcontractors	Material	67	G1-2
Supervision and audit systems and their results	Material	67	GRI 2-6 (2021) G1-2
<b>Consumers</b>			
Measures for the consumer health and safety	Material	60	ESRS 2 MDR-T ESRS 2 MDR-A S4-4 Measures
Complaint systems, complaints received and resolved	Material	60	S4-3
<b>Tax information</b>			
Profit obtained country by country	Material	74	GRI 3-3 (2021)
Income tax paid	Material	74	GRI 3-3 (2021)
Public subsidies received	Material	74	GRI 201-4 regarding subsidies



# Audax Renovables, S.A. and subsidiaries

Limited Assurance Report issued by an  
assurance provider on the Consolidated Non-  
Financial Information Statement (NFIS) and the  
Sustainability Reporting

31 December 2024

*(Translation from the original in Spanish. In the  
event of discrepancy, the Spanish-language  
version prevails.)*



KPMG Auditores, S.L.  
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## **Limited Assurance Report issued by an assurance provider on the Consolidated Non-Financial Information Statement and the Sustainability Reporting of Audax Renovables, S.A. and subsidiaries for 2024**

*(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)*

To the Shareholders of Audax Renovables, S.A.

### **Limited Assurance Conclusion**

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Pursuant to article 49 of the Spanish Code of Commerce, we have performed a limited assurance review of the accompanying Consolidated Non-Financial Information Statement (hereinafter, NFIS) of Audax Renovables, S.A. (hereinafter, the Entity) and its subsidiaries (hereinafter, the Group) for the year ended 31 December 2024, which forms part of the consolidated directors' report of the Group.

The NFIS includes additional information to that required by prevailing mercantile legislation concerning non-financial information, namely the sustainability reporting prepared by the Group for the year ended 31 December 2024 (hereinafter, the Sustainability Reporting) in accordance with the provisions of Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 on Corporate Sustainability Reporting (CSRD). This Sustainability Reporting has also been subject to a limited assurance review.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that:

- a) The Group's Non-Financial Information Statement for the year ended 31 December 2024 has not been prepared, in all material respects, in accordance with prevailing mercantile legislation and selected criteria of the European Sustainability Reporting Standards (ESRS), as well as the other criteria described based on each subject area in the "5.5 List of requirements under Law 11/2018 on non-financial information and diversity" table of the aforementioned Statement;
- b) The Sustainability Reporting as a whole has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in the accompanying note "General basis for the preparation of the Sustainability Statement (BP-1)", including:
  - That the description of the process for identifying the sustainability reporting information included in note "Description of the process of determining and evaluating material impacts, risks and opportunities (IRO-1)" is consistent with the process carried out and that it identifies the material information to be disclosed in accordance with the requirements of the ESRS.
  - Compliance with ESRS.

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- Compliance of the disclosure requirements, included in subsection "2.1 Disclosure of information under article 8 of Regulation (EU) 2020/852 (the Taxonomy Regulation) of the environment section of the Sustainability Reporting, with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

## **Basis for Conclusion**

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We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Revised Guidelines 47 and 56 for assurance engagements on non-financial information issued by the Spanish Institute of Registered Auditors (ICJCE) and considering the contents of the note published by the Spanish Accounting and Audit Institute (ICAC) on 18 December 2024 (hereinafter, Generally Accepted Professional Standards).

The scope of the procedures applied in a limited assurance engagement is less than those required in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the level of assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under this standard are further described in the Assurance Provider Responsibilities section of our report.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) of the International Ethics Standards Board for Accountants (IESBA Code of Ethics), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies the International Standard on Quality Management 1 (ISQM 1), which requires us to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

## **Other Matter**

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On 27 February 2024, a different assurance provider issued a favourable independent assurance report on the Consolidated Non-Financial Information Statement of Audax Renovables, S.A. and subsidiaries for 2023.

## **Directors' Responsibility**

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The preparation of the NFIS included in the consolidated directors' report of the Group, and the content thereof, is the responsibility of the Directors of Audax Renovables, S.A. The NFIS has been prepared in accordance with prevailing mercantile legislation and selected criteria of the ESRS, as well as the other criteria described based on each subject area in the "5.5 List of requirements

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under Law 11/2018 on non-financial information and diversity" table of the aforementioned Statement.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the NFIS is free from material misstatement, whether due to fraud or error.

The Directors of Audax Renovables, S.A. are also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the NFIS was obtained.

In relation to the Sustainability Reporting, the entity's Directors are responsible for developing and implementing a process for identifying the information to be included in the Sustainability Reporting in accordance with the contents of the CSRD, the ESRS and Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 and for disclosing information about this process in the Sustainability Reporting in note "Description of the process of determining and evaluating material impacts, risks and opportunities (IRO-1)". This responsibility includes:

- understanding the context in which the Group's business activities and relationships are conducted, and its stakeholders, in relation to the Group's impact on people and the environment;
- identifying actual and potential impacts (both negative and positive), and any risks and opportunities that might affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing and the cost of capital in the short, medium or long term;
- evaluating the materiality of the impacts, risks and opportunities identified; and
- making assumptions and estimates that are reasonable in the circumstances.

The Directors are also responsible for the preparation of the Sustainability Reporting, including the information identified by the process, in accordance with the sustainability reporting framework applied, including compliance of the CSRD, the ESRS and the disclosure requirements included in subsection "2.1 Disclosure of information under article 8 of Regulation (EU) 2020/852 (the Taxonomy Regulation)" of the environmental section of the Sustainability Reporting with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- Designing, implementing and maintaining such internal control as the Directors consider necessary to enable the preparation of sustainability reporting that is free from material misstatement, whether due to fraud or error.
- Selecting and applying appropriate methods for sustainability reporting and making assumptions and estimates that are reasonable in the circumstances for specific disclosures.



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## **Inherent Limitations in the Preparation of the Information**

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In accordance with the ESRS, the Entity's Directors are required to prepare prospective information based on assumptions and hypotheses, which are to be included in the Sustainability Reporting, regarding events that may occur in the future, as well as any possible future actions that the Group may take. The actual outcome may differ significantly from the estimates, as future events often do not occur as expected.

In determining sustainability disclosures, the Entity's Directors interpret legal and other terms that are not clearly defined and may be interpreted differently by others, including the legal conformity of such interpretations, and are therefore subject to uncertainty.

## **Responsibility of the Assurance Provider**

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Our objectives are to plan and perform the assurance engagement in order to obtain limited assurance about whether the NFIS and Sustainability Reporting are free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusions thereon. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we exercise professional judgement and maintain professional scepticism throughout the engagement. We also:

- Design and implement procedures to assess whether the process for identifying the information to be included in both the NFIS and Sustainability Reporting is consistent with the description of the process followed by the Group and allows, where appropriate, for the identification of material information to be disclosed in accordance with the requirements of the ESRS.
- Apply risk-based procedures, including obtaining an understanding of internal controls relevant to the engagement in order to identify the disclosures where material misstatements are more likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion about the effectiveness of the Group's internal control.
- Design and implement procedures that respond to disclosures in both the NFIS and the Sustainability Reporting that are likely to contain material misstatements. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

## **Summary of Work Performed**

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A limited assurance engagement includes performing procedures to obtain evidence to support our conclusions. The nature, timing and scope of the procedures selected depend on professional judgement, including the identification of the disclosures in which material misstatements, whether due to fraud or error, are likely to arise in the NFIS and the Sustainability Reporting.

Our work consisted of making inquiries of management, as well as of the different units and components of the Group that participated in the preparation of the NFIS and the Sustainability

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Reporting, reviewing the processes for compiling and validating the information presented in the NFIS and the Sustainability Reporting and applying certain analytical procedures and sample review tests, which are described below:

In relation to the NFIS assurance process:

- Meetings with the Group's personnel to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the NFIS for 2024 based on the materiality analysis performed by the Group and described in the note "Description of the process of determining and evaluating material impacts, risks and opportunities (IRO-1)", considering the content required by prevailing mercantile legislation.
- Analysis of the processes for compiling and validating the data presented in the NFIS for 2024.
- Review of the information relative to the risks, policies and management approaches applied in relation to the material aspects presented in the NFIS for 2024.
- Corroboration, through sample testing, of the information relative to the content of the NFIS for 2024 and whether it has been adequately compiled based on data provided by the information sources.

In relation to the assurance work on the Sustainability Reporting:

- Making inquiries of Group personnel:
  - to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain information necessary for the external review.
  - to understand the source of information used by management (e.g. stakeholder interaction, business plans and strategy documents) and review the Group's internal documentation on its process.
- Through inquiries of Group personnel, gaining an understanding of the Group's processes for collecting, validating and reporting information relevant to the preparation of its sustainability reporting.
- Assessment of how consistent the evidence obtained from our procedures on the Group's process for determining the information to be included in the Sustainability Reporting is with the description of the process included in the Sustainability Reporting, and assessment of whether the Group's process duly identifies the material information to be disclosed in accordance with the requirements of the ESRS.
- Assessment of whether all the information identified in the Group's process for determining the information to be included in the Sustainability Reporting is effectively included.
- Assessment of how consistent the structure and presentation of the Sustainability Reporting is with the provisions of the ESRS and the rest of the sustainability reporting framework applied by the Group.

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- Inquiries of relevant personnel and performance of analytical procedures on the information disclosed in the Sustainability Reporting considering where material misstatements are likely to arise, whether due to fraud or error.
- Performance of sample substantive procedures on information disclosed in the Sustainability Reporting considering where material misstatements are likely to arise, whether due to fraud or error.
- Procurement of any reports issued by accredited independent third parties included as an appendix to the consolidated directors' report in response to the requirements of European regulations and, in relation to the information to which they refer and in accordance with Generally Accepted Professional Standards, confirmation solely that the accreditation of the assurance provider and the scope of the report issued is in line with European regulations.
- Procurement of any documents containing the information included by reference, the reports issued by auditors or assurance providers on those documents and, in accordance with Generally Accepted Professional Standards, confirmation solely that the document referred to by such information included by reference meets the conditions described in the ESRS for incorporating information by reference in the Sustainability Reporting.
- Procurement of a representation letter from the Directors and management regarding the NFIS and the Sustainability Reporting.

## **Other Information**

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Management of the entity is responsible for other information. Other information comprises the consolidated annual accounts and other information included in the consolidated directors' report, but does not include either the auditor's report on the consolidated annual accounts or assurance reports issued by accredited independent third parties required by European Union law on specific disclosures contained in the Sustainability Reporting included as an appendix to the consolidated directors' report.

Our assurance report does not cover other information and we do not express any assurance conclusions on said information.

In connection with our engagement to provide assurance on the Sustainability Reporting, our responsibility is to read the other information identified above and, in so doing, consider whether the other information is materially inconsistent with the Sustainability Reporting or with the knowledge we have acquired during the assurance engagement that could be indicative of material misstatements in the Sustainability Reporting.

KPMG Auditores, S.L.

*(Signed on original in Spanish)*

Silvana Alfaya Bas

27 February 2025