

Slavery and Human Trafficking Prevention Policy
Elmya Group – 2026 Edition

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1. Corporate Statement and Commitment

Grupo Elmya maintains a firm, unequivocal and zero-tolerance commitment against any form of modern slavery, forced labour, servitude, human trafficking or labour exploitation, both in its own operations and throughout its supply chain. This commitment is grounded in the Group's corporate values, in particular integrity, respect for people, responsibility, and the promotion of a safe, dignified working environment.

As an international business group operating in the renewable energy sector, with main activity in Spain, the United Kingdom, the United States and Italy, and with a clear intention to expand into additional markets, Elmya recognises that risks of human rights violations may exist in any economy and in any supply chain. For this reason, this Policy is designed as a global framework applicable in all countries where the Group operates, regardless of whether local legislation imposes specific obligations in relation to modern slavery.

This Statement is adopted in alignment with the Grupo Elmya Code of Ethics and Conduct and the Supplier Code of Conduct, of which it forms an integral part. It also constitutes an essential element of the Group's Compliance System and is embedded in the corporate culture as a minimum standard of conduct required from all individuals and entities acting on behalf of Elmya or collaborating with the Group.

2. International Framework of Reference

This Policy has been prepared with the purpose of globally meeting the main international standards and requirements in relation to the prevention of modern slavery and human trafficking, and in particular those derived from the most relevant legal frameworks in the jurisdictions where Elmya operates, as well as the best practices required by major international clients, lenders and industrial partners.

Without prejudice to compliance with the applicable legislation in each jurisdiction, Elmya takes the following international standards as a cross-border baseline: the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the principles of the United Nations Global Compact. Elmya also draws on the Fundamental Conventions of the International Labour Organization, including those related to the elimination of forced labour and child labour, freedom of association, collective bargaining and non-discrimination.

From a regulatory standpoint, this Policy is issued in order to comply, where required, with supply chain transparency obligations, including those derived from the UK Modern Slavery Act 2015. It also takes into consideration relevant legal frameworks in the United States, including, among others, the California Transparency in Supply Chains Act and Section 307 of the US Tariff Act of 1930, which prohibits the importation of goods produced with forced labour, as well as

other applicable federal provisions relating to human trafficking and public procurement. At European level, Elmya also considers the standards and obligations arising from the European Union's legal framework on sustainability and human rights due diligence, including both existing and developing regulations, as well as any obligations arising from sectoral rules, contractual requirements or financing arrangements in the jurisdictions where the Group operates.

This Policy shall be interpreted broadly, with the aim of applying the most demanding standard where differences exist between local regulations or reference frameworks.

3. Definitions and Material Scope

For the purposes of this Statement, Elmya understands modern slavery as any form of labour exploitation that deprives or substantially limits a person's freedom or their genuine ability to leave an employment relationship. This includes, among others, forced or compulsory labour, servitude, debt bondage, human trafficking for the purpose of labour exploitation, unlawful retention of documentation, illegitimate restrictions on freedom of movement, physical or psychological coercion, threats, abuse of vulnerability, or the imposition of improper recruitment fees.

Elmya also considers incompatible with its values any form of child labour carried out in breach of applicable legislation or international standards, including the ILO conventions on minimum age and the worst forms of child labour.

4. Subjective Scope and Application

This Policy applies to all companies within Grupo Elmya, as well as to its employees, managers, directors, officers and board members, and to any person acting on its behalf. It also applies to suppliers, subcontractors, intermediaries, agents, consultants, business partners and any third party providing goods or services to the Group or participating in projects executed by Elmya.

Compliance with this Policy is an essential requirement in the Group's relationships with third parties. Elmya expects its suppliers to implement reasonable controls to ensure that these requirements are also applied throughout their own supply chains, particularly in subcontracted activities or in contexts involving successive subcontracting.

5. Group Structure, Business Activity and Risk Context

Elmya carries out engineering, procurement and construction (EPC) activities and operation and maintenance (O&M) services for renewable energy installations, operating in an industrial environment where project execution may require the involvement of multiple companies and professional profiles, including seconded personnel, specialised subcontracting and supply chains for equipment and materials.

Elmya acknowledges that certain sectors and geographies may present increased risks of labour rights violations, particularly where supply chains are complex, temporary hiring is intensive, cross-border deployment is required, or where intermediaries are used. Therefore, modern slavery prevention is integrated as a relevant risk within the internal control system, with an approach proportionate to the nature and scale of operations and to the risk profile of the project or supplier.

6. Governance, Internal Responsibilities and Oversight

Oversight of this Policy is integrated into Grupo Elmya's Compliance System. The Criminal Compliance Body and the Legal Department, in coordination with the relevant functions for procurement, human resources and QHSE, drive its implementation, review its effectiveness and promote continuous improvement.

Responsibility for modern slavery prevention is not limited to a single function, but extends across the organisation. Those responsible for recruitment, procurement, project management and operational leadership are expected to act with heightened diligence in identifying risks and ensuring that appropriate standards are required from third parties.

Elmya may establish specific procedures, internal guidelines or additional control measures for projects or geographies with higher risk, without prejudice to this Policy being the general reference framework.

7. Due Diligence and Supply Chain Controls

Elmya integrates modern slavery prevention into its due diligence system, especially in supplier and subcontractor selection and qualification processes. The Group requires suppliers to adhere to the Supplier Code of Conduct, which includes specific commitments on human rights, the prohibition of forced labour, the prohibition of modern slavery, and compliance with international standards.

As part of this approach, Elmya may request suppliers to provide reasonable information on their labour policies, subcontracting structure, use of intermediaries or recruitment agencies, verification controls and their ability to ensure decent working conditions. Depending on the level of risk, the Group may require additional commitments, corrective action plans, specific training or enhanced control mechanisms.

Where the supplier subcontracts all or part of the services, Elmya expects equivalent contractual commitments to be flowed down through the supply chain, ensuring that the standards of this Policy apply throughout the entire supply chain linked to the project.

8. Working Conditions, Responsible Recruitment and Express Prohibitions

Elmya promotes fair and dignified working conditions and requires that any recruitment linked to its projects be carried out on the basis of voluntariness,

transparency and legality. Suppliers must ensure that workers receive clear and understandable information about their employment relationship, essential terms, remuneration and working time, and that they are free to leave employment in accordance with applicable law.

Within Elmya and its supply chain, forced or compulsory labour is prohibited in any form. The retention of passports or personal documents, the imposition of improper recruitment fees, coercive debt, unlawful restriction of movement or any form of coercion is not permitted. Human trafficking is strictly prohibited, as is the employment of minors in breach of applicable legislation or international standards.

Elmya also requires respect for the dignity of individuals, equal opportunities and the prohibition of discrimination, harassment or abuse. The prevention of modern slavery is considered inseparable from the prevention of any form of exploitation, abuse or degradation of the worker.

9. Training, Awareness and Corporate Culture

Elmya promotes internal awareness and training in relation to ethics, compliance and human rights, paying particular attention to teams with greater exposure to risk, such as procurement, project management, human resources and international operations.

Training aims to strengthen the ability to identify warning signs, promote a culture of diligence and ensure that individuals acting on behalf of the Group understand their obligations and know how to proceed in the event of suspicious situations.

Elmya will also promote awareness among critical suppliers through communications, contractual clauses, qualification requirements or training actions where reasonable and proportionate.

10. Ethics Channel, Reporting of Irregularities and Protection Against Retaliation

Elmya provides employees, suppliers and third parties with an Ethics and Whistleblowing Channel, accessible through its corporate website, through which suspicions or evidence relating to modern slavery, forced labour, human trafficking or any other serious human rights violation linked to the Group's activity or supply chain may be reported anonymously and confidentially.

All reports will be analysed independently in accordance with the Group's internal procedures, ensuring confidentiality, respect for the rights of all parties and the adoption of proportionate measures. Elmya expressly prohibits any retaliation against individuals who, in good faith, raise a concern or cooperate in an investigation, and considers retaliation a serious breach of its ethical principles.

11. Audits, Verification and Corrective Measures

Elmya may carry out, in a proportionate manner and in accordance with applicable law, reasonable verification activities aimed at assessing compliance with this Policy, especially in relation to critical suppliers or higher-risk contexts. Such verification may include requests for documentation, reviews of compliance evidence, due diligence questionnaires, audits or project inspections, always respecting confidentiality and data protection obligations.

Where non-compliance is identified, Elmya may require corrective measures and action plans. If the breach is serious, repeated, or involves the exploitation of individuals, the Group may suspend or terminate the contractual relationship, without prejudice to any legal liabilities that may arise and to the obligation to cooperate with competent authorities where appropriate.

12. Review, Update and Publication

Elmya will periodically review this Policy to ensure it remains appropriate in light of regulatory developments, changes in the Group's business model, geographical expansion and the risks identified in the supply chain. The Policy may be updated where necessary to ensure alignment with the highest international standards.

This Statement is published as an accessible and transparent document, intended to serve as a global reference for Grupo Elmya's commitment against modern slavery and human trafficking, in compliance with applicable legal obligations and the due diligence standards required by international clients, partners and lenders.

13. Approval

This Modern Slavery and Human Trafficking Prevention Policy has been approved by the governing body of Grupo Elmya and is issued as a corporate statement applicable from the 2026 financial year onwards, in compliance with supply chain transparency requirements and international human rights due diligence standards.

Signed on behalf of Elmya Group,

A handwritten signature in blue ink, appearing to be "J. Piñar", written over a light blue circular stamp.

Mr. José María Piñar Celestino
CEO – Elmya Group