

1. Introduction

Through this Sustainability Policy, the Neklar Group (hereinafter, 'Neklar') establishes the reference framework for the effective integration of environmental, social and good governance (ESG) issues in the strategic and decision-making process of the company, in the development of products and services, and in the relationship with the main stakeholders.

Neklar's activity takes place in an environment that requires a sustainable development strategy that favors the creation of long-term value for the benefit of all stakeholders.

To this end, Neklar is part of the United Nations Global Compact and demonstrates its commitment to the 2030 Agenda by contributing to the achievement of the 17 Sustainable Development Goals (SDGs) and their targets, especially those in which it can generate the greatest positive impact, and which are perfectly aligned with its strategy of promoting clean and sustainable mobility.

2. Scope of application

This Policy is applicable to all the companies that are part of the Neklar Group, and entails all personnel, regardless of the position and function they perform. Likewise, it promotes the application of the principles and bases of the Policy to any natural and/or legal person linked to Neklar by a relationship other than employment, when this is possible.

3. Commitments and Principles of action

In order to achieve its mission and vision, Neklar bases its activity on the following commitments and principles with the different areas and specific parties, which serve as a reference framework to regulate the operation of the organization:

3.1. Human and labor rights, diversity and non-discrimination

- Promote respect for internationally recognized human rights set forth in the 10 principles of the Global Compact and the United Nations International Bill of Human Rights, in the Universal Declaration of Human Rights and in the European Convention on Human Rights.
- Provide a safe and healthy work environment for employees and other collaborators to achieve the goal of 0 accidents. Have certified occupational health and safety management systems.
- Create open, dynamic and flexible work environments that foster creativity and innovation as one of the pillars of the company's strategy and business model.
- Promote work in remunerative conditions and of all kinds worthy, preventing any type of exploitation.
- Eliminate any type of discrimination, harassment, or violence in the workplace.
- Prohibit any type of modern slavery (forced labor, child labor, human trafficking, etc.) and ask suppliers for the same commitment.

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- Comply with all applicable labor regulations regarding working conditions, respecting the agreements negotiated with the workers' representatives.
- Safeguard the free association of workers and collective bargaining.

3.2. Environment and fight against climate change

- Incorporate sustainable development criteria in all areas of the activity, guaranteeing efficient management of natural resources and minimizing the unwanted effects of the activity, with special attention to climate change and the preservation of biodiversity.
- Establish mitigation and adaptation measures to climate change, including actions aimed at:
 - Gradually reducing the intensity of greenhouse gas emissions by setting quantifiable and measurable targets.
 - Integrating the variable of climate change in internal decision-making and investment processes, as well as in the analysis and management of long-term risks.
 - Pursuing innovative advances in the design of products that contribute to providing sustainable solutions, in particular in the use of alternative sources of renewable energy and the recyclability of materials.
 - Introducing circular economy criteria in the company's activities, prioritizing the use of recycled materials in the production process.
 - Promoting and adopting energy saving and efficiency measures.
 - Promoting initiatives to raise awareness among employees and external stakeholders regarding climate change aimed at consolidating a culture in the group for efficient and responsible use of energy and resources.
 - Promoting agreements and programs with other stakeholders in order to take advantage of the group's knowledge and resources to solve climate-related problems and generate social value.
 - Transparent reporting of the results and relevant actions in the fight against climate change.
- Develop continuous improvement actions for the correct use and protection of water quality.
- Develop improvement actions in the control of the use of potentially dangerous substances and in the correct management of waste.
- Implement certified environmental management systems.

3.3. Legality, fiscal responsibility and the fight against corruption and fraud

- Comply with current legislation in the places where it carries out its activity, adopting, in a complementary and voluntary manner, international commitments and guidelines when deemed appropriate.
- Develop the activity in a fiscally responsible manner, complying with the applicable regulations, cooperating appropriately with the tax administrations, adopting business decisions that may have tax implications with full knowledge and following reasonable interpretations, and not using opaque or artificial structures with the sole purpose of avoiding or reducing the tax burden.
- Establish control measures to prevent, detect and punish any type of corruption or fraud.

3.4. Shareholders

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- Act in the most efficient way possible, guided by sustainable objectives and commitments, to generate value for shareholders through the return on invested capital with the aim of remunerating the risk assumed by them.
- The Board of Directors, as the main pillar of the governance and sustainability system of the Neklar Group, undertakes to guarantee equality of information and the exercise of the rights of the shareholders, avoiding any situation of privilege or advantage, within the framework of the interest of the Company.

3.5. Customers

- Develop products aligned with customers' sustainability strategy.
- Guarantee safety, compliance with applicable regulations and the highest quality standards for Neklar's products and services.
- Carry out responsible project management, aimed at improving customer satisfaction and identifying, evaluating and responding to their needs with sustainability criteria.
- Promote and expand the communication channels that allow customers to communicate with the company for possible incidents or any aspect related to Neklar's products or services.

3.6. Supply chain

Suppliers are fundamental actors in the optimal functioning of Neklar's value chain, with whom the company promotes the maintenance of trusting, stable, solid and mutually beneficial relationships, under the principles of transparency and risk management. For all these reasons, the company undertakes to:

- Extend its culture, policies and codes to the supply chain, transmitting the objective of service excellence, resource efficiency and the company's principles of responsible action, and promoting the incorporation of sustainability criteria in its daily management.
- Encourage the hiring of suppliers from the country or region where the company carries out its activities in the face of similar competition in other locations, supporting the generation of a positive social impact.
- Promote practices that favor the traceability and fair trade of raw materials from origin.

3.7. Development of society and the communities in which it operates

- Build firm links with the communities in which the group develops its activity and with respect for the different social and cultural realities of each of them.
- Promote social action initiatives that favor the development of a more inclusive and more sustainable society through technology and innovation, with special attention to the group of people with disabilities and the social, environmental and climate change challenges of local communities.

4. Related Policies

Neklar Group has a set of standards that seek not only to comply with the applicable regulations, but also to incorporate the best national and international practices and recommendations in terms of sustainability.

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In this way, this Sustainability Policy is complemented by the rest of Neklar's internal regulations and, in particular by the:

- Business Principles
- Ethical code
- Compliance Policy
- Competition Policy
- Anticorruption Policy
- Information Security Policy
- Safety, Health and Environment Policy
- Labor and sexual harassment protocol

5. Monitoring and supervision

Management will ensure compliance with this Policy through the approval of specific action plans. Annually, through the Sustainability Report (Non-Financial Information Statement), progress in the implementation of this policy will be communicated externally. Said report is formulated by the Board of Directors, forms part of the Management Report and is submitted for approval by the General Shareholders' Meeting as a separate item on the agenda.

6. Approval and dissemination

This Policy is approved by Neklar's Board of Directors at its meeting on 25, October 2022 the date on which it comes into force.

To facilitate its knowledge by the interested parties and recipients, this Policy will be published on the intranet and on the Group Portal and will be disseminated throughout the organization.