



ESG REPORT 2023

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Letter from the CEO

The year 2023 was characterised by geopolitical and macroeconomic uncertainty. However, it was also a period during which many public decision-makers demonstrated their conviction in the benefits of the energy transition, particularly in terms of economic development, industrialisation and employment. This was evidenced at COP28 in Dubai.

In this context, CTGE operates in the renewable energy sector from an industrial perspective and with long-term objectives, with the firm intention of contributing to the strategic autonomy and energy transition objectives set by the European Union, and thus achieving a fully decarbonised economy.

Over the past year, there has been a notable increase in capacity for wind, solar and other renewable energy sources, which has contributed to a reduction in carbon emissions and efforts to combat climate change. The company has obtained several key ISO certifications that are crucial in guiding and improving its management practices.

As of 2024, the following ISO certifications were held: ISO 14001: Environmental Management, ISO 9001: Quality Management and ISO 45001: Occupational Health and Safety Management. These certifications cover all the company's offices, which are located in Spain, Greece, Portugal, Germany and Luxembourg.

Furthermore, the renewable energy generation in 2023 has the potential to supply over one million households in Spain with electricity for a year, based on an average household consumption of 3,272 kWh per year.

Additionally, China Three Gorges España (CTG España) has reached an agreement to acquire a 494 MW solar photovoltaic (PV) facility in the Murcia region from Northleaf and Qualitas Energy (Q-Energy). The plant generates approximately 750,000 MWh of clean energy per year, which is sufficient to supply a city of 450,000 inhabitants.

Furthermore, the company continues to expand in accordance with approved energy policies and regulations. In response to stakeholder dialogue on environmental concerns, the well-being of employees, the geographic areas in which the company operates, and the global community, the sustainability strategy has been developed.

Furthermore, we are dedicated to the wider society through our contribution to corporate social responsibility (CSR) initiatives. During the course of 2023, CTGE allocated in excess of one million euros to activities designed to prevent and mitigate environmental impacts.

Our commitment to innovation has enabled us to make considerable progress in energy efficiency and technological advancement, ensuring that our operations are not only environmentally responsible but also economically efficient.

We continue to lead the way in renewable energy research and development, firmly convinced of the importance of electrifying demand as a crucial step in achieving the Sustainable Development Goals set out in the 2030 Agenda.

This ESG Report evinces our unwavering commitment to contribute to a more sustainable future, in accordance with the principles of transparency and responsibility. This commitment is reflected in the manner in which we conduct our operations across the entire company, with the objective of achieving climate neutrality.

As CEO of CTGE, I would like to express my gratitude to our employees and partners for their unwavering support and dedication to achieving our goals.

We are pleased to welcome you to CTGE. Thank you for your interest in our organisation.



Ignacio Herrero Ruiz

1

General
information



1. General information

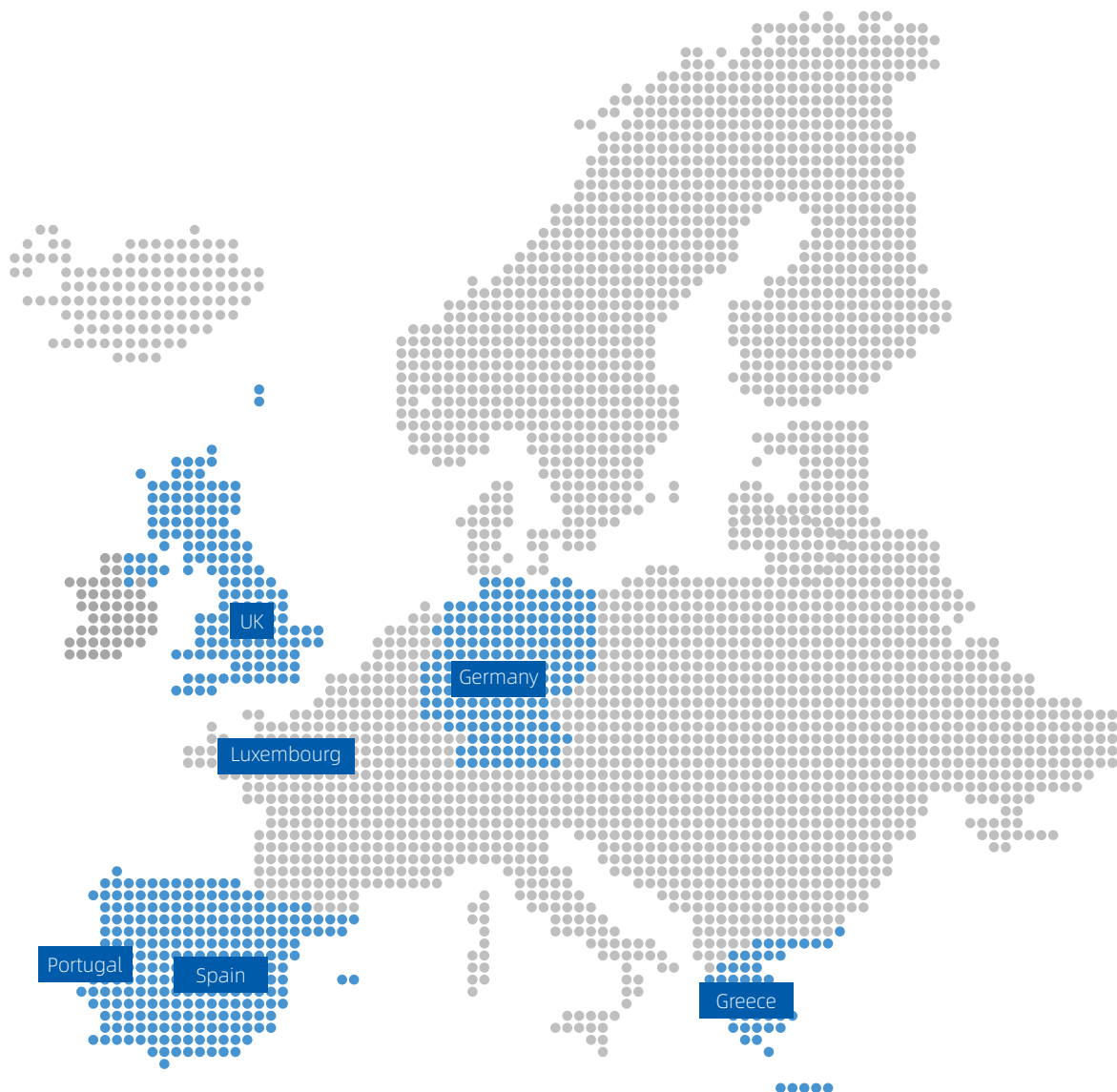
1.1 The Company

China Three Gorges Europe (hereinafter CTG Europe or CTGE) is a prominent renewable energy producer, forming part of China Three Gorges Corporation—the largest clean energy group in China and the leading hydropower company globally. Since our inception in 2011, CTGE has been at the forefront of Europe’s energy transition, actively contributing to the region’s decarbonization goals.

Our operations span across Europe, with significant clean energy generation platforms in Spain, the UK, Germany, Greece, Portugal, and Luxembourg. We pride ourselves on our diverse geographical footprint and are continually looking to expand our presence to foster sustainable energy solutions in new regions.

As a clean energy leader, we aim to enhance the sustainability and efficiency of energy production by harnessing the power of renewable resources. CTGE is committed to overcoming challenges and accelerating our business development to improve our overall corporate capabilities. Through innovation and strategic growth, we aim to strengthen our contribution to a greener, more sustainable future.

Guided by the vision of our parent company, China Three Gorges Corporation, we strive to be a catalyst in the clean energy sector, advancing the frontiers of renewable energy technologies. Our initiatives are strategically aligned with Europe’s energy policies, with the objective of delivering substantial contributions to the global energy landscape.

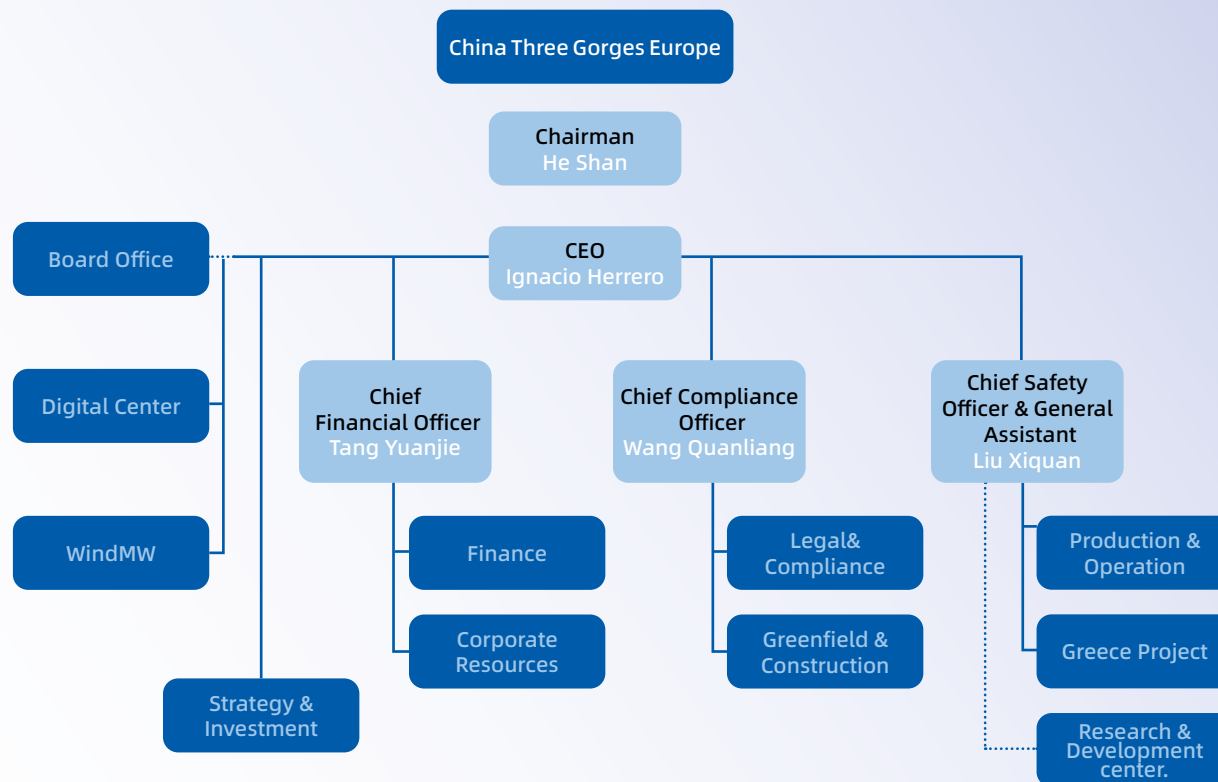


1.2 Structure

CTGE operates under a robust governance framework that ensures comprehensive oversight and strategic guidance at every operational level. This framework is anchored by the General Meetings of Shareholders, a diverse and experienced Board of Directors headed by **Chairman He Shan**, and specialized committees. The Board plays a crucial role in policy formulation and strategic decision-making.

Management at CTGE is led by **CEO Ignacio Herrero** and includes several key departments such as Strategy & Investment, Finance, Corporate Resources, Legal & Compliance, Greenfield & Construction, and Production & Operation. Each department is geared towards supporting the organization's strategic objectives and sustainable growth.

The **Audit Committee** oversees risk management, internal controls, and legal compliance, ensuring high standards of integrity. Additionally, stakeholder engagement is prioritized to align with the company's sustainability goals, with engagement through shareholder meetings, community initiatives, and social platforms, effectively addressing the dynamic needs of the energy sector.



1.3 Mission, Vision and Values

CTGE aim is to produce renewable energy, enhancing local development and establishing a significant link between our Chinese heritage and our European identity.

1.3.1 Values

CTGE is committed to innovating solutions that propel development towards carbon neutrality. We prioritize both **internal and external collaboration**, engagement with shareholders and stakeholders, active committee involvement, and input from external advisors. These collaborative efforts reinforce our dedication to **sustainability**.

Our commitment extends to **openly sharing** our accomplishments and transparently providing information to foster trust and ensure accountability in our sustainability initiatives. We aim for **excellence** in every facet of our operations, establishing rigorous benchmarks for sustainability and environmental guardianship.

1.3.2 Mission

Our mission is to align sustainable growth with environmental protection, securing the welfare of our communities and the planet via renewable energy.

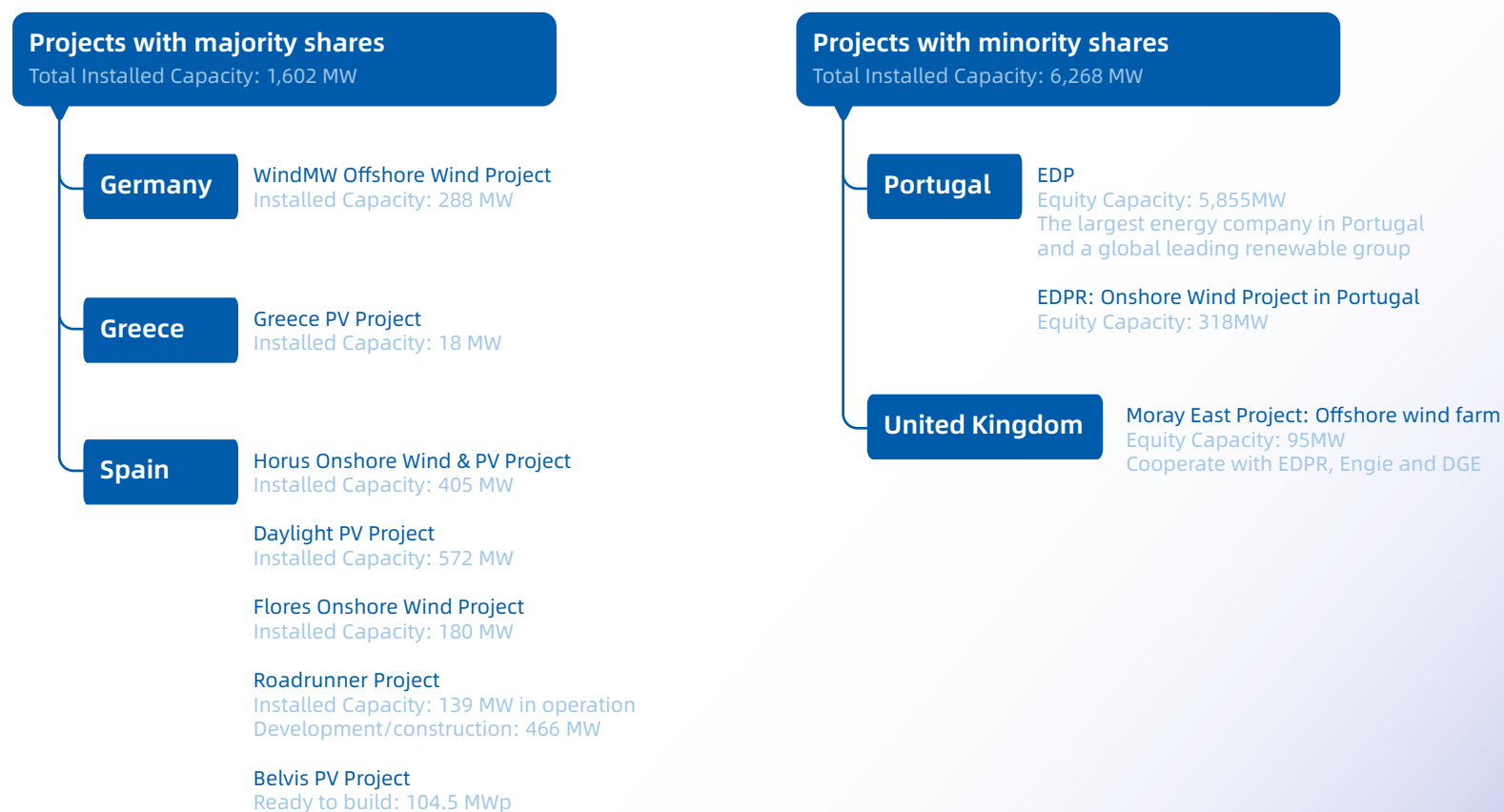
1.3.3 Vision

Our vision for the future is powered by clean energy, setting the standard in creating a company devoted to environmental integrity and sustained growth.



1.4 Projects

To achieve the mentioned objectives, we hold shares in a different company across various countries, as outlined in the following diagram:

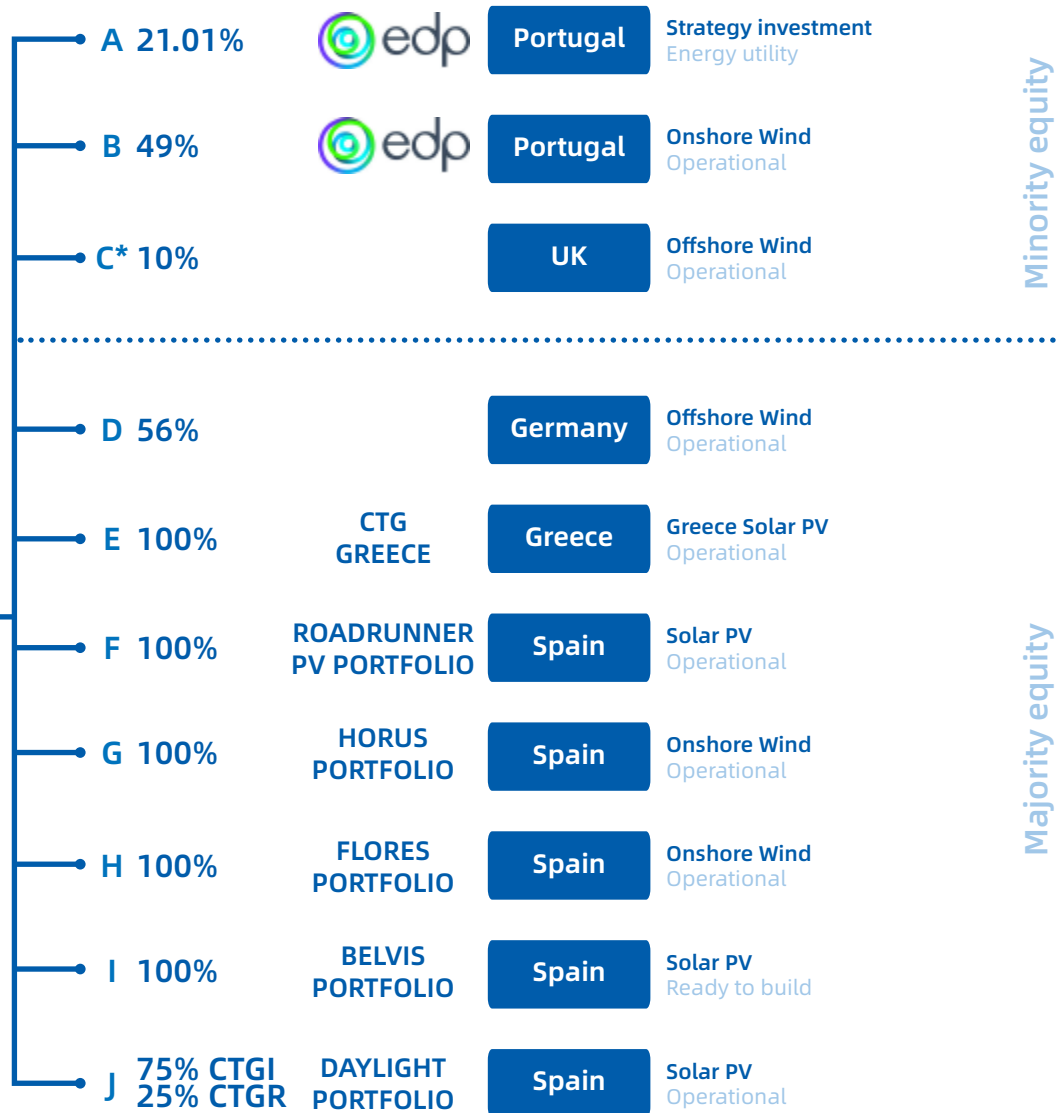




China 77,7%



Luxembourg



Minority equity

Majority equity

*CTGE is no longer the owner of this participation. The process for selling 10% of the UK offshore wind project began on 31st of December 2023 and was completed on 17th of April 2024.

1.5 The Renewable Energy Sector

The renewable energy sector is pivotal in the global shift towards sustainable energy solutions, driven by the urgent need to **mitigate climate change impacts**. This dynamic industry is witnessing rapid technological advancements and increasing investments, particularly in wind, solar, and hydropower.

Innovations in energy storage and smart grid technology, alongside decreasing costs for photovoltaic cells and wind turbines, are making renewable sources **more efficient and economically viable** compared to traditional fossil fuels.

Additionally, the sector is a significant economic driver, creating jobs worldwide in the manufacturing, installation, and maintenance of renewable infrastructure. This not only contributes to economic growth but enhances energy **security by reducing reliance on fossil fuels**. As international commitments like the Paris Agreement push for decarbonization, the renewable energy sector continues to expand, playing a crucial role in shaping a sustainable future.

1.6 Policies

CTGE is committed to upholding the highest standards of integrity and transparency in all aspects of our operations. To guide our conduct and ensure compliance we have developed the following set of policies which will be explained in detail in each correspondent section:

Quality, Health & Safety and Environmental (QHSE) Policy

Anti-Corruption Policy

Anti-Bribery Policy

Code of Ethics

Digital Disconnection Policy

Gift Policy

2

**Commitment to
Sustainability**



2. Commitment to Sustainability

2.1 CTGE as a Conduit for Sustainability

CTGE is a leader in sustainability within the renewable energy sector, continually extending its reach and operations throughout Europe.

As detailed in their 2022 Sustainability Report, CTGE has made significant strides in enhancing its renewable energy capabilities, notably through the augmentation of wind and solar capacities. This expansion not only supports the ongoing transition towards sustainable energy but also contributes to significant reductions in carbon emissions, aligning with global efforts to combat climate change.

CTGE's strategic initiatives are not confined to environmental impacts alone, they also encompass comprehensive stakeholder engagement and the anticipation of market shifts, ensuring a sustainable and adaptable business model.

The company's proactive approach in dialoguing with stakeholders about key environmental concerns like climate action and sustainable resource utilization showcases its commitment to environmental stewardship and corporate responsibility.

These efforts are part of a broader sustainability strategy that leverages technological advancements to maintain economic efficiency while upholding environmental and social responsibilities, proving that CTGE is not just participating in the renewable energy market but is actively shaping its evolution towards a more sustainable and ethical future.

On this page, we can see the main Sustainable Development Goals (SDGs) in which CTGE's activity is impacting:



2.2 Assessment of Materiality

CTGE is aware of the importance of transparency and sustainability in its operations. As a result of this, CTGE conducted an impact materiality analysis during 2023. This analysis identified the following material topics:

However, the Corporate Sustainability Reporting Directive (CSRD) demands a dual materiality analysis considering the following two dimensions:



Impact Materiality

How the company impacts sustainability issues

Financial Materiality

How these issues can affect the company

In order to comply with this requirement CTGE has extended the scope by conducting the financial materiality analysis during 2024. This analysis consisted of a series of interviews with diverse Directors of the company.

Once the risk and opportunities were identified, these were rated and prioritized taking into consideration their impact and probability. This process determined the financial materiality of the company. Afterwards financial topics were incorporated into a dual materiality matrix, confronting financial materiality with impact materiality.

The initial graphic delineates the European Sustainability Reporting Standards (ESRS) corresponding to each domain: environmental, social, and governance.

The following illustration provides an overview of the topics addressed in CTGE's Double Materiality Assessment. Those topics identified as material through this rigorous assessment are distinctly emphasized in bold, underscoring their critical importance and the company's commitment to addressing these key areas:

Environmental

- ESRS E1: Climate Change
- ESRS E2: Pollution
- ESRS E3: Water and Marine Resources
- ESRS E4: Biodiversity and Ecosystems
- ESRS E5: Resource Use and Circular

Social

- ESRS S1: Own Workforce
- ESRS S2: Workers in the Value Chain
- ESRS S3: Affected Communities
- ESRS S4: Consumers and End-users

Governance

- ESRS G1: Business Conduct



Double Materiality Topics

- ESRS E1: Climate Change (adaption)
- ESRS E1: Climate Change (clean power)
- ESRS G1: Business Conduct (Law observance and compliance)



Impact Materiality Topic

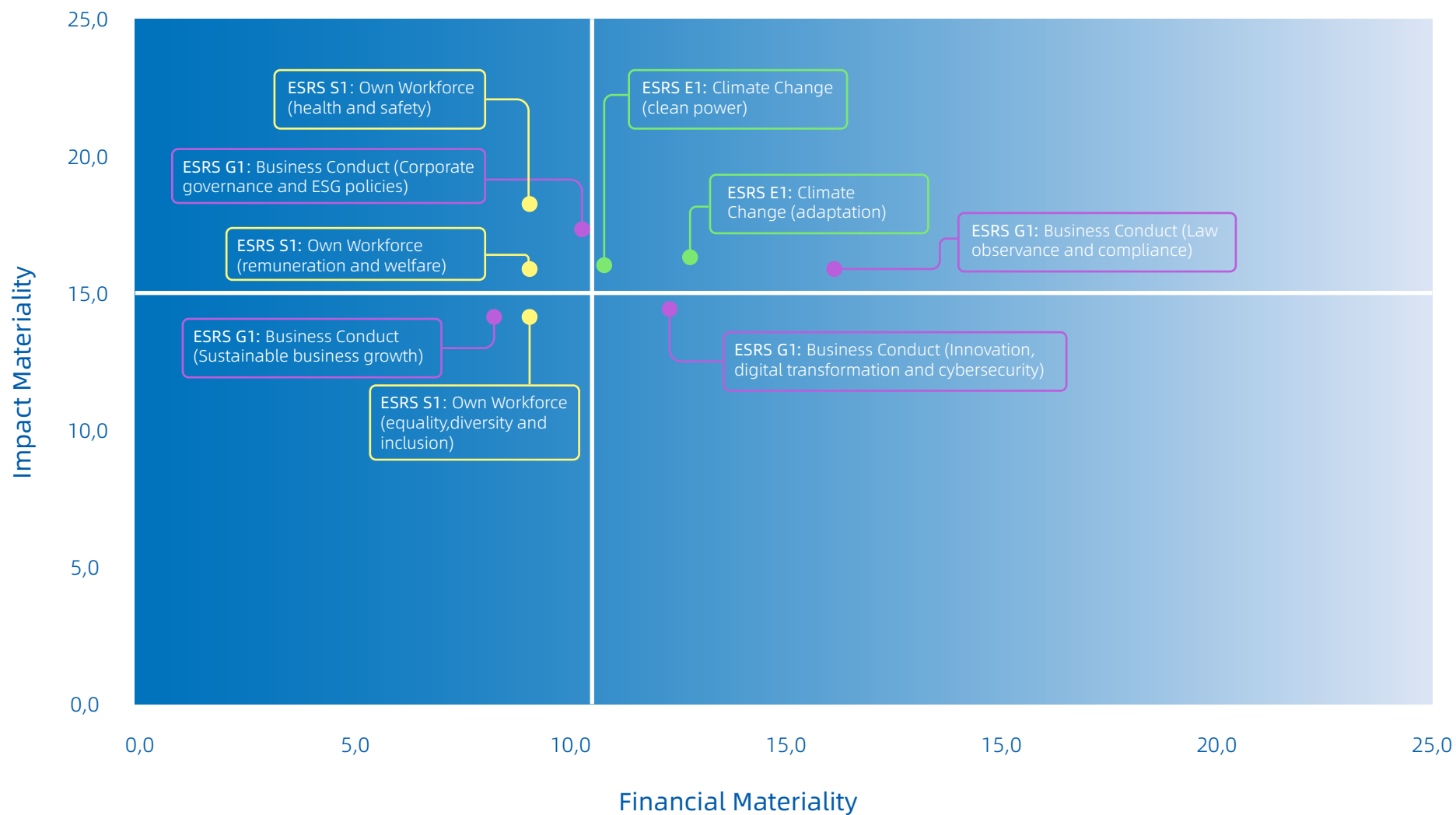
- ESRS S1: Own Workforce (remuneration and welfare)
- ESRS S1: Own Workforce (health and safety)
- ESRS G1: Business Conduct (Corporate governance and ESG policies)



Financial Materiality Topics

- ESRS G1: Business Conduct (innovation, digital transformation and cybersecurity)

CTGE's Double Materiality Assessment



3

Risks and Opportunities



3. Risks and Opportunities

CTGE, as a pivotal entity in the renewable energy sector, is exposed to various inherent risks associated with its operations and the geographic diversity of its activities. We have established a corporate risk management system, overseen by the Legal & Compliance team. This system includes comprehensive market analysis of various compliance platforms, tools, and software that support the tracking and monitoring of internal risks.

This analysis has facilitated the creation of a risk map, which serves as the basis for implementing necessary detective, corrective, and preventive measures.

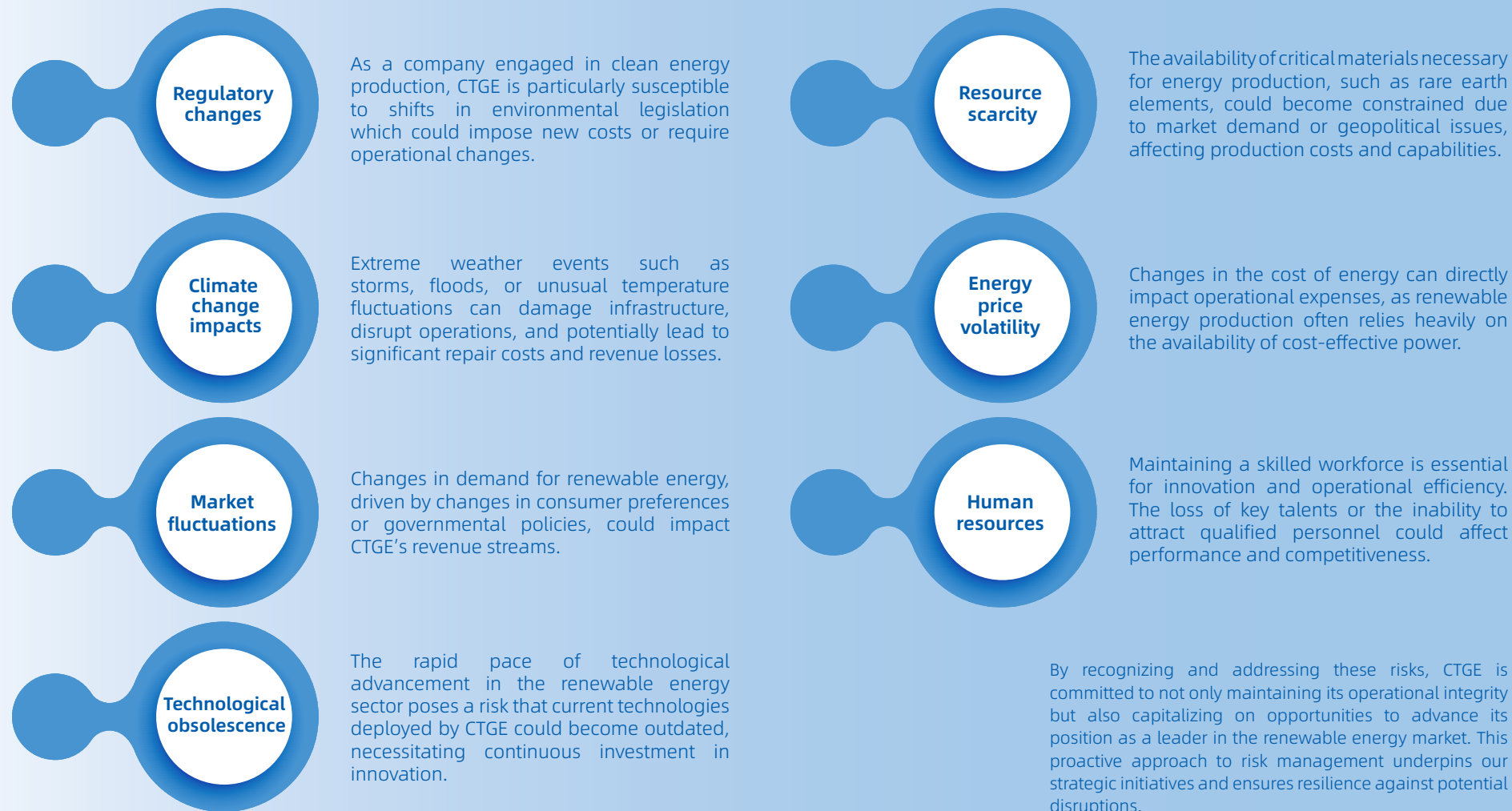
In 2023, CTGE has hired an external consultant to install the Compliance software. This software will include a module specifically designed for penal compliance, among other functionalities, thus strengthening our compliance framework.

The risk management process is supported by the Company Risk Management Committee, established in 2020. European companies have further developed "Risk Management Committee Operating Rules," which delineate the functions and responsibilities of the committee. This framework guides the risk management department and establishes a comprehensive and effective organizational responsibility system for managing risks.

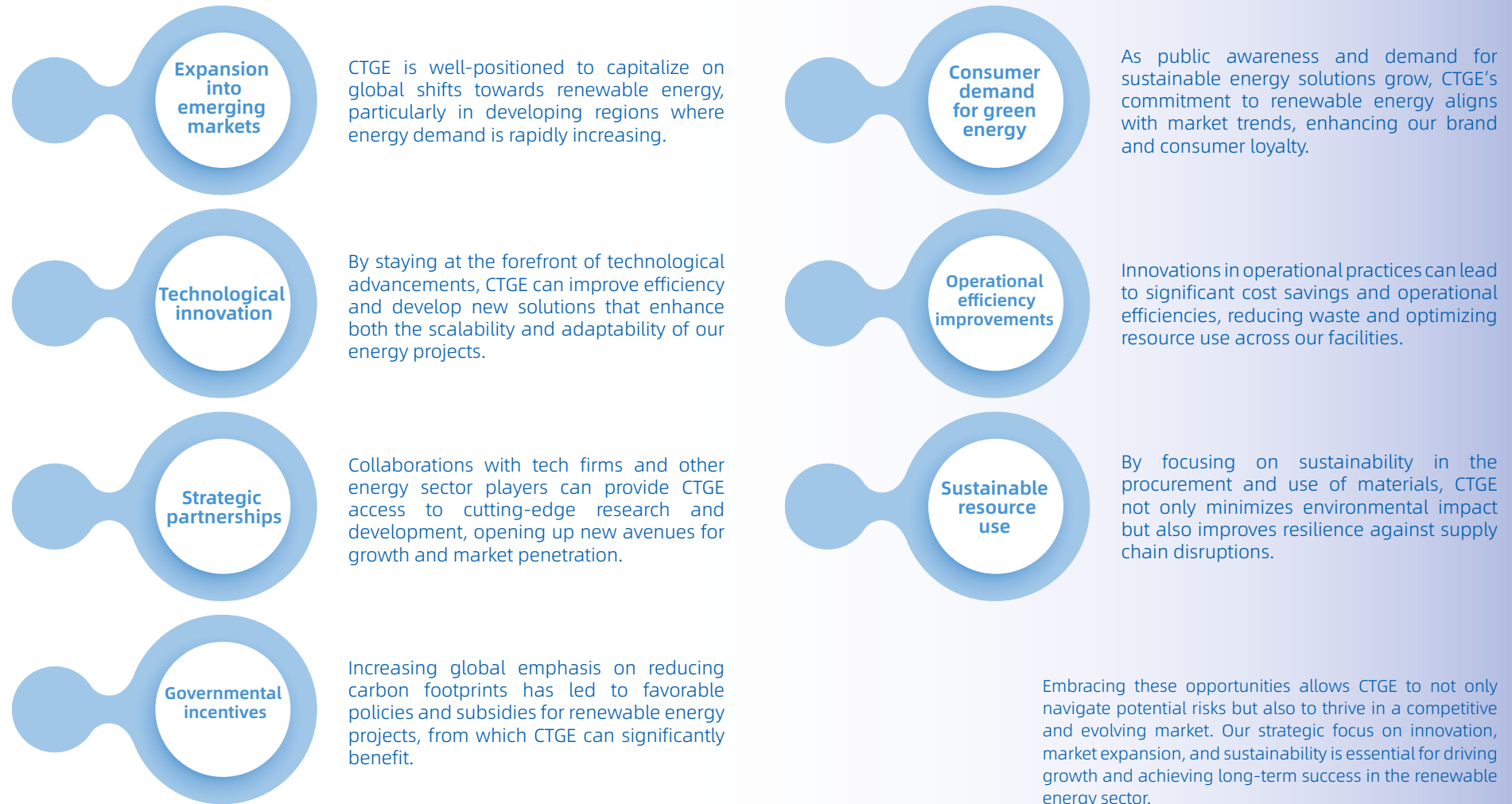
The Major Risk Assessment Report is conducted by the Legal and Compliance department with support from various company departments. This report adheres to a structured approach to risk identification and management.

By fostering an integrated and strategic approach to risk management, CTGE not only safeguards its operations but also identifies potential opportunities for growth and innovation, reinforcing our commitment to sustainability and corporate excellence.

3.1 Risks



3.2 Opportunities



4

**Environmental
information**



Photo by Daniel Rodríguez Robledo


4. Environmental information

At CTGE, commitment to environmental protection is a central element of our corporate philosophy and operational strategy. Being part of CTG Corporation, the world's largest hydropower development and operation enterprise as well as China's leading clean energy group, our performance towards environment respect and protection in Europe could not be other way. Since our establishment in 2011, we have been at the forefront of efforts to reduce carbon emissions and promote renewable energy, aligning our operations with the European Union's ambitious decarbonization goals.

To effectively uphold our commitment to combating environmental pollution and climate change, we foster a culture that emphasizes awareness, respect, and proactive defence of these critical issues. This culture is deeply rooted in the principles and guidelines set forth by the Paris Agreement and the Sustainable Development Goals (SDGs) within the framework of the 2030 Agenda.


Sustainable Development Goals we actively contribute:

7 AFFORDABLE AND CLEAN ENERGY



By generating clean energy, we help increase the share of renewable energy in the European energy mix, promoting access to affordable, reliable, sustainable, and modern energy for all.

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



Through continuous innovation and research, CTGE enhances the efficiency and performance of its renewable energy generation facilities.

13 CLIMATE ACTION

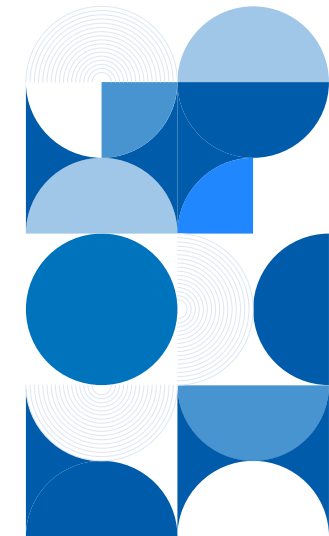





Photo by Carlos García Sanjuán

Our approach is guided by key principles of sustainability, excellence, collaboration, and innovation, ensuring that we contribute positively to the ecosystems and communities in which we operate. In this regard, we recognize that sustainable development and environmental protection are not only ethical imperatives but also fundamental to our long-term business success.

Our investments in renewable energy projects across Europe reflect our commitment to **minimizing environmental impacts and fostering a greener future**, and the dedication to continuous innovation and research ensure that our renewable energy generation facilities are as efficient and high-performing as possible.

The guidelines for the environmental protection are specified in our **Quality, Health & Safety and Environmental (QHSE) Policy**, highlighted below:

1

Continuous improvement of the Integrated Management System Meet all environmental requirements and legal compliance.

2

Maintain a high level of environmental protection

3

Apply and monitor best practices to minimize our environmental impacts and prevent pollution.

4

Apply environmental protection guidelines to implement practical and appropriate environmental protections.

5

Emergency planning for foreseeable environmental emergencies

4.1 Environmental Impacts of our activities

Although we are a key player in the renewable energy sector, our activities have an impact in the environment.

Our work starts by addressing these environmental risks and impacts through rigorous impact assessments, establishing preventive measures and developing mitigation strategies, all of this accompanied by continuous monitoring. By integrating environmental considerations into every stage of our project lifecycle, from planning and development to operation and decommissioning, we aim to minimize our ecological footprint and promote the coexistence of our renewable energy initiatives with the natural environment.

Environmental impacts

Habitat disruption and biodiversity loss

The installation of large-scale solar panels modifies land use and impact on local flora and fauna. Vegetation removal and soil compaction during construction can lead to habitat loss and fragmentation, affecting species that rely on these areas. That's why CTGE implements several compensatory and corrective measures across its PV portfolios in Spain to minimize impacts related to habitat disruption and biodiversity loss.

Among these measures, we have installed specially designed fences that allow the safe passage of animals across the solar farms, effectively reducing habitat fragmentation and enabling species to traverse the terrain without disruption. Additionally, we have established vegetative screens using native plants around the perimeters of the solar farms to enhance landscape integration and provide supplementary habitats for wildlife.

Additionally to the photovoltaic plants, the onshore wind farms installations interferes directly with the fauna; birds and bats are particularly vulnerable, as they may collide with turbine blades. Our collaboration with Migres Foundation, a long-term monitoring program of bird migration through the Strait of Gibraltar, allows us to develop compensatory measures in the wind farms located in Andalusian territory, such as the Flores portfolio, through a team of expert ornithologists specialized in migratory and marine birds.

We would like to highlight our voluntary program in La Janda region to monitor the Northern Bald Ibis, an endangered species with highly localized populations in Spain. We are committed to collecting comprehensive data on the status of these populations and regularly monitor them. This enables us to implement targeted corrective actions, such as temporarily shutting down specific wind turbines during crucial periods, to prevent any disruption to the Northern Bald Ibis and to safeguard this vulnerable species.

Another wind farm from the Flores portfolio is located in Catalonia, where a monitoring and management program for the golden eagle was also carried out during 2023. This program included monitoring the reproduction and prey species of the golden eagle, with the aim of establishing compensatory habitat management measures.

For a comprehensive overview of all the compensatory and corrective measures implemented related to biodiversity, please refer to section Biodiversity and Ecosystems, where detailed information on our efforts to protect and enhance biodiversity in and around our portfolios can be found.



Marine ecosystem impacts

The development of offshore wind farms involves seabed disturbances during the installation of turbines, which affects the life in marine ecosystems. During the operation of these offshore wind farms, aquatic fauna can also be affected to some extent, which is why we are conducting research on the cabling and power transmission system in order to reduce these impacts as much as possible throughout our SUBSEACAM Project in the MeerWind Portfolio in German North Sea.

The approach of this project helps ensure the safe coexistence of marine ecosystems with energy infrastructure, reflecting CTGE's commitment to both technological innovation and environmental stewardship. For more detailed information, please refer to the section on Water and Marine Resources.

Offshore wind farms can also affect marine bird species. Birds may collide with turbine blades or experience habitat changes due to the presence of the structures. The disruption of flight paths and foraging areas may have impacts on marine bird populations.

Water resource use

Maintenance of PV plants may affect local water resources without efficient management and planning of this natural resource.

Our way to make smart use of water starts with planning the cleaning of the photovoltaic modules according to the expected weather. In addition, we use efficient cleaning techniques such as roller cleaning, which avoids the use of large amounts of water. It should also be noted that part of the water we use for these purposes comes from tanker trucks. By using water from these sources, we ensure that we do not draw from local water resources, which is especially important during the summer months when water stress is common in Spain and Greece.

In our PV plants, we have established vegetation and green screens along the perimeter barriers. These measures are implemented to naturalise the environment, support the local fauna that passes through the area, and prevent soil erosion. The maintenance of these barriers also involves water consumption. To achieve efficient water use and management, we plant native species that are well adapted to the local climatic and soil conditions. Additionally, our revegetation program carefully determines the optimal planting times to ensure that new vegetation is introduced at the most suitable periods for growth and survival. Our irrigation plan is meticulously designed to provide the necessary amounts of water based on the specific needs of these plants, ensuring that water is used as efficiently as possible.

Visual and noise pollution

Both PV plants and wind farms can significantly alter the landscape, impacting local communities and potentially leading to opposition based on aesthetic concerns.

The vegetation planted around PV plants aims to naturalise the area and reduce the visual impact. By using native plant species, we create green screens that help integrate the photovoltaic installations into the surrounding landscape. This strategy minimizes the visibility of the solar panels and associated infrastructure, making them less intrusive.

With regard to noise impact, the operation of wind turbines generates noise, which can be a source of disturbance to wildlife.

With regard to noise impact, the operation of wind turbines generates noise, which can be a source of disturbance to wildlife. In accordance with the Environmental Impact Statement (EIS), noise measurements are conducted in some projects to monitor and assess the impact. During the construction phase, the guidelines set out in the EIS were strictly followed, including adhering to specified working hours and avoiding certain times of day or breeding seasons, as required, to minimize disruption to local wildlife.

Waste generation

The disposal of solar panels and wind turbine blades generate hazardous waste that can cause significant pollution if not properly managed. We have a solid strategy for the reuse of photovoltaic modules in order to reach a real circular economy, while at the same time seeking recovery alternatives for those materials that are difficult to introduce into the recycling chain.



4.1.1 Resources for Environmental Risk Prevention and Certifications

In 2023 alone, CTGE dedicated over one million euros to a variety of activities aimed at preventing and mitigating environmental impacts.

This significant investment covers extensive consultancy services to conduct thorough environmental impact assessments and to provide expert guidance on risk mitigation strategies. By partnering with industry-leading advisors, we ensure the development and implementation of best practices in environmental management, aligning with local, national, and international regulations.

Our proactive measures include advanced monitoring systems, habitat conservation programs, and pollution control technologies designed to prevent environmental incidents before they occur, or to reduce the impacts that are currently taking place. Our commitment extends to continuous improvement through research and development, enabling us to innovate and enhance our environmental risk management practices.

In order to achieve and guarantee these high standards of quality, environmental responsibility, and occupational health and safety across all our operations, we have obtained several key ISO certifications that are crucial in guiding and improving our management practices. As of 2024, we hold the following ISO certifications:

ISO 14001: Environmental Management

This certification helps us to systematically manage our environmental responsibilities. It enables us to identify and control the environmental impact of our activities, continuously improve our environmental performance, and ensure compliance with environmental regulations. By adopting ISO 14001, we can mitigate risks related to environmental liabilities, reduce waste, and enhance resource efficiency.

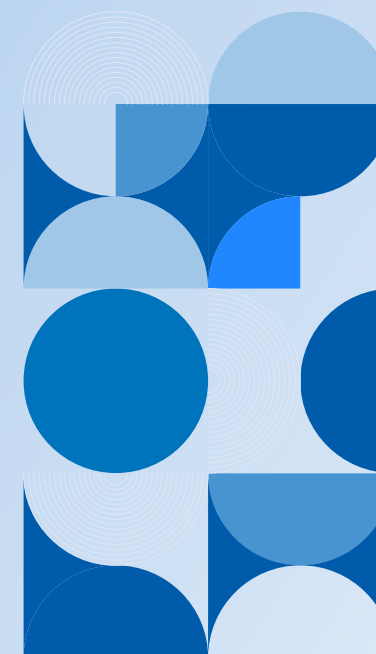
ISO 9001: Quality Management

ISO 9001 certification ensures that we maintain a high standard of quality across our processes and services. It provides a framework for continuous improvement and customer satisfaction, ensuring that our products and services consistently meet customer and regulatory requirements. This certification enhances our operational efficiency, reduces errors, and fosters a culture of quality within our organization.

ISO 45001: Occupational Health and Safety Management

With this certification we want to demonstrate our commitment to providing a safe and healthy workplace for all employees. This certification helps us identify and mitigate risks related to occupational health and safety, reduce workplace incidents, and ensure compliance with health and safety regulations. Implementing ISO 45001 fosters a proactive approach to risk management and enhances employee well-being and morale.

These certifications cover all our offices. In terms of energy generation portfolios, they encompass the Daylight portfolio in Spain, the Germany project and the Greece project. Initially implemented in 2021, these certifications were renewed in 2024 and will be valid for three years, until 2027.



4.1.2 Precautionary Principle and Environmental Risk Provisions

In line with our commitment to environmental stewardship, we ensure that all preventive measures are diligently applied in our wind and photovoltaic plants to minimize any potential impacts. We continuously monitor and manage environmental risks in our existing facilities, adopting best practices and implementing advanced technologies to safeguard the surrounding ecosystems.

Our adherence to ISO 9001, ISO 14001, and ISO 45001 certifications mentioned above, provide robust frameworks for establishing management systems that prevent, control, and manage any risks associated with our operations. These certifications ensure that our management processes are systematic, consistent, and effective, enabling us to maintain high standards of quality, environmental protection, and occupational health and safety across all our activities.

For new construction projects, comprehensive environmental studies are conducted prior to development. These include thorough water analyses and ongoing monitoring of local wildlife to anticipate any negative environmental incidents. Our aim is to protect the natural habitats and biodiversity of the regions where we operate.

To comply with national legislation and further enhance our environmental protection efforts, we have deposited decommissioning bonds with the municipalities hosting our portfolios. These bonds are financial instruments that guarantee the correct execution of dismantling and removal activities at the end of the operational life of our installations. The decommissioning bonds serve as a robust safeguard, assuring all stakeholders that our assets will be dismantled in a manner that restores the land to its natural state, thereby preventing any future ecological risks.

By securing these bonds, we ensure that we are financially prepared to responsibly dismantle and remove all structures, preventing any long-term environmental damage.



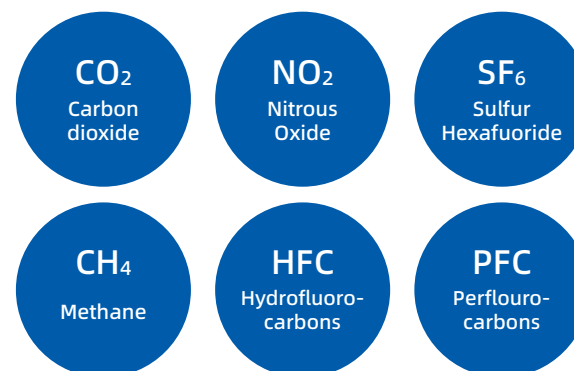


4.2 Climate change

4.2.1 Climate Change Mitigation

Over the past few decades, climate change has emerged as a pressing global issue, driven by economic and demographic growth that has led to unprecedented levels of greenhouse gas (GHG) concentrations in the atmosphere. This escalating environmental challenge underscores the responsibility of all organizations to understand and mitigate their contributions to global warming. Addressing climate change is not only a global imperative but also a critical factor in ensuring the sustainability and resilience of business operations.

Direct greenhouse gases are composed by the following next:



The results of the carbon footprint are always expressed in equivalent carbon dioxide units (CO₂ eq), encompassing all emissions in the same equivalence unit based on their global warming potential (GWP).

At CTGE, **carbon footprint is calculated each year**, encompassing all activities and installations within our operational control. This comprehensive assessment helps us understand the impact of our emissions and enables us to track progress over time, thereby establishing increasingly effective reduction and mitigation strategies. Our carbon footprint represents the total amount of GHGs emitted by our organization and our activities over the year.

The Carbon Footprint is categorized into different scopes (scope 1, 2, and 3). For this report, we have included scope 1 (direct emissions) and scope 2 (indirect emissions from purchased energy), while scope 3 (indirect emissions from the value chain) is excluded from this year's analysis. This exclusion is due to our ongoing efforts to enhance data collection procedures. We are working towards establishing a robust data quality system that will enable us to include scope 3 emissions in our future reports.

Our calculations are based on guidelines and data from the Ministry for the Ecological Transition and the Demographic Challenge (Spain), the Ministry of Environment and Energy (Greece), Regulation (EU) 2018/2066 on the monitoring and reporting of greenhouse gas emissions (Germany), and Carbon Footprint (Greece and Germany), a specialized consultancy in this area. The emission factors used come from official sources and are specific for each type of gas and emission source.

Photo by Daniel Rodríguez Robledo

Total GHG emissions per project and office in 2023

Assets	GHG Emissions (tCO ₂ eq)
Scope 1	
Horus portfolio (Spain)	70.56
MeerWind Project (Germany)	1,260.47
Scope 2	
Daylight PV portfolio (Spain)	0.00
Horus portfolio (Spain)	496.65
Flores Wind portfolio (Spain)	0.00
Roadrunner PV portfolio (Spain)	129.54
MeerWind Project (Germany)	597.46
Greek PV Project	43.78
TOTAL	2,598.46

Offices	GHG Emissions (tCO ₂ eq)
Scope 2	
Board Office (Luxembourg)	0.00
Madrid office	14.73
Greece office	1.12
Portugal office	5.04
TOTAL	20.89



Among all our projects, the MeerWind project in Germany stands out as the highest emitter of greenhouse gases over the year. This is primarily due to its substantial energy consumption, which includes both fossil fuels and electricity. The significant use of diesel generators and fuel for maintenance activities, combined with the energy demands of its offshore installations, contribute to its high emissions profile.

Focusing on our projects in Spain, the Horus portfolio is identified as the major source of emissions, mainly attributed to its high electricity consumption. Notably, some projects report zero emissions in this category as they utilize self-generated renewable energy for their operational needs, thus reducing reliance on external power sources and minimizing overall GHG emissions.

Total GHG emissions per emission source in 2023

	Assets	GHG Emissions (tCO ₂ eq)
Scope 1	Stationary combustion	12.49
	Mobile combustion	1,247.98
	Fugitive emissions	70.56
Scope 2	Energy consumption	1,267.43
TOTAL (tCO ₂ eq)		2,598.46

Scope 1 emissions include those from the combustion of fuels in both stationary and mobile sources. In Germany, diesel generators contribute to our emissions, with four primary generators and one emergency generator used for black start procedures during power outages. Additionally, this offshore wind project in Germany generates emissions from mobile sources, specifically gasoline-powered vehicles and two diesel-powered boats that access the installations. In Spain, we also account for fugitive emissions from insulating gases, particularly sulfur hexafluoride (SF₆), which is used in some wind turbines and has been recharged as necessary.

Fossil fuel consumption in Spanish projects is not included in this year's analysis. This is because the fuel is consumed by a subcontracted O&M external company, and therefore, it falls under Scope 3 emissions, which are not covered in the current reporting period.

Scope 2 emissions stem from the electricity consumed across our various projects as shown above.

Photo by Antonio J. Bolaños

Comparative of total GHG emissions per year

Scope	GHG Emissions (tCO ₂ eq) 2023	GHG Emissions (tCO ₂ eq) 2022
Scope 1	1,331.03	12.49
Scope 2	1,247.43	1,247.98
TOTAL	2,598.46	2,848.03

The comparative analysis of GHG emissions for the years 2023 and 2022 highlights a notable reduction in overall emissions.

In 2023, total GHG emissions amounted to 2,598.46 tCO₂eq, compared to 2,848.03 tCO₂eq in 2022, representing a reduction of approximately 8.77%.

This decrease in emissions is primarily attributed to the significant reduction in Scope 2 emissions, which encompass indirect emissions from electricity consumption. Notably, several of our projects now utilize self-generated renewable energy with guarantees of origin, thereby eliminating associated emissions and contributing to the overall reduction in Scope 2 emissions.

Our continuous efforts towards energy efficiency have been instrumental in achieving these results. By implementing a variety of measures, such as utilization of Guarantees of Origin (GoOs) in the energy we consume and optimizing our consumption patterns, we have made substantial progress in reducing our carbon footprint. This ongoing commitment to efficiency and sustainability is gradually enabling us to meet the zero emission targets (scope 1 + 2) of CTG Corporation.

Emission intensity rate per year

Our carbon footprint indicator is based on the tonnes of CO₂ equivalent emitted per megawatt-hour (MWh) of electricity generated annually across our projects. This key performance indicator (KPI) is particularly well-suited to CTGE's operations, as the company is dedicated to generating renewable energy. It allows us to accurately measure the carbon intensity of our energy production and track its evolution over time.

In 2023, the total GHG emissions intensity was 0.73 tCO₂e/GWh, a significant improvement compared to the 2022 figure of 0.95 tCO₂e/GWh. This represents a 23.16% reduction in carbon intensity from the previous year.

This reduction in the KPI is due not only to the overall decrease in emissions but also to the increase in energy generated, as detailed in the Energy section, highlighting CTGE's ongoing commitment to enhancing the efficiency and sustainability of its operations.

Avoided emissions

As a company dedicated to the production of renewable energy through both solar and wind power, CTGE significantly contributes to the avoidance of emissions typically associated with non-renewable energy generation. By harnessing clean energy sources, we help reduce the reliance on fossil fuel-based power plants, which are major contributors to greenhouse gas emissions.

In 2023, the total emissions avoided due to our renewable energy production across our portfolios amounted to 722,917.46 tCO₂eq.*

*These avoided emissions were calculated based on the total GWh generated by our projects during the year 2023, applying the specific electricity mix of each country in gCO₂e/kWh.

This substantial emissions savings underscores the positive environmental impact of our operations and highlights our role in promoting sustainable energy solutions.

4.2.2 Climate Change Adaptation

CTGE recognizes that climate change poses significant risks to its operations. The potential impacts of climate change on our activities include a range of physical and environmental challenges that could affect both wind and solar energy generation.

For **wind energy**, increased frequency and intensity of extreme weather events such as storms, hurricanes, and high winds could potentially damage wind turbines and related infrastructure. Changes in wind patterns and speeds may also affect the efficiency and predictability of wind energy production. Additionally, sea level rise and coastal erosion could threaten offshore wind installations.

Solar energy generation could be impacted by increased temperatures, which, while potentially boosting solar efficiency, can also lead to overheating and reduced performance of photovoltaic panels. More frequent and severe weather events, such as hailstorms and heavy rainfall, pose risks to both ground-mounted and rooftop solar installations. Furthermore, prolonged periods of drought could lead to dust accumulation on solar panels, reducing their efficiency and necessitating more frequent cleaning and maintenance. In this regard, to adapt to climate change, we have strategic plans for the efficient use of water in cleaning solar panels, considering weather forecasts to optimize water usage.



In addition to all these challenges, we are already noticing the increased risk of extreme wildfires in south Europe, specially in Spain and Greece, due to prolonged drought conditions year after year. This situation directly impacts CTGE during the summer months and periods of extreme fire risk, when access to our installations in rural areas is restricted for our operators and technicians. Since these areas are only accessible by vehicle, there is an increased possibility of starting a fire. Consequently, the activities of our personnel can be significantly affected, disrupting the operation and maintenance of our plants.

To better prepare for the materialization of these risks, it is necessary for CTGE to start analysing how climate change could further affect our operations. In 2025, we will work on this aspect, developing realistic objectives to effectively manage and mitigate these risks. By proactively addressing these challenges, we strive to ensure the continued reliability and sustainability of our renewable energy projects.

Photo by Daniel Rodríguez Robledo

4.2.3 Energy

From our position as an Independent Power Producer (IPP), the energy consumed in our wind and photovoltaic plants comes from various sources. As highlighted in the carbon footprint section, our operations utilize both fossil fuels and electricity to support our activities.

Projects fuel consumption in 2023

Assets	Diesel (l)	Gasoline (l)
MeerWind Project (Germany)	447,346.00	7,838.53
TOTAL	455,184.53	

These fossil fuels (diesel and gasoline) are only used in our German projects. Diesel is employed in auxiliary generators, while gasoline powers the boats and vehicles used by our operators. In Spain, the fuel consumption for maintenance vehicles cannot be accounted for because the maintenance service is fully outsourced, as previously mentioned.

Projects fuel consumption in 2023

Assets	Electricity consumption (MWh) 2023
Daylight PV portfolio (Spain)	3,296.20
Horus portfolio (Spain)	3,576.41
Flores Wind portfolio (Spain)	2,279.16
Roadrunner PV portfolio (Spain)	819.34
MeerWind Project (Germany)	1,670.75
Greek PV project	267.40
TOTAL	11,909.26

The electricity consumed by our renewable energy projects is necessary for plant operations, especially when self-produced electricity is not available. This consumption ensures the continuous and efficient functioning of the infrastructure, including monitoring systems, control units, and essential maintenance activities. Some of our projects, such as the Flores Wind portfolio and the Daylight PV portfolio, use self-generated renewable energy, resulting in zero emissions from electricity consumption.

Additionally, our central offices in Luxembourg consume energy with Guarantees of Origin (GoOs).

Offices	Electricity consumption (MWh) 2023
Board office (Luxembourg)	3.23
Madrid office	91.50
Greece office	2.68
Portugal office	33.72
TOTAL	131.13

Future prospect related to energy consumption

Our strategic goal for 2024-2025 is to achieve carbon neutrality for Scope 1 and Scope 2 emissions. This will be accomplished through the management of Power Purchase Agreements (PPAs) for green energy and utilizing GoOs generated from our renewable energy production to offset any non-renewable energy consumption.

To reach this goal, we will need to phase out the use of fossil fuels, which will involve implementing measures in the facilities that currently consume fossil fuels, as well as in the vehicles used for operational purposes.

Projects electricity production in 2023

Assets	Electricity production (GWh) 2023	Electricity production (GWh) 2022
Daylight PV portfolio (Spain)	1,049.57	984.06
Horus PV and Wind portfolio (Spain)	767.44	650.72
Flores Wind portfolio (Spain)	350.28	227.63
Roadrunner PV portfolio (Spain)	235.77	0.00
MeerWind Project (Germany)	1,132.65	1,110.68
Greek PV Project	25.12	25.79
TOTAL	3,560.83	2,998.88

In 2023, the renewable energy projects located in Spain were responsible for generating approximately 67.47% of the total energy produced by CTGE. This substantial contribution underscores the pivotal role that our Spanish assets play in our overall energy production strategy.

The combined generation from these projects amounted to 2,403.06 GWh out of a total of 3,560.83 GWh, highlighting their significant impact on our renewable energy output.

Among all our projects, the MeerWind project in Germany stands out as the single largest contributor to our energy generation in 2023. This offshore wind project produced 1,132.65 GWh, accounting for approximately 31.81% of the total energy generated by CTGE.

Our renewable energy generation in 2023 can power more than 1 million households in Spain for an entire year, based on an average household consumption of 3,272 kWh annually.¹

¹ According to average annual consumption data provided by Red Eléctrica.

Increasing the electricity production

The table below shows the percentage increase in electricity production for each of our projects, comparing the years 2022 and 2023. This data highlights the significant progress made across most of our renewable energy projects.

Assets	Electricity production (2023 vs. 2022)
Daylight PV portfolio (Spain)	+ 6.66%
Horus PV and Wind portfolio (Spain)	+17.94%
Flores Wind portfolio (Spain)	+53.88%
Roadrunner PV portfolio (Spain)	*
MeerWind Project (Germany)	+1.98%
Greek PV Project	-2.59%
TOTAL	+18.74%

*The Roadrunner PV portfolio was not yet connected to the grid in 2022. The comparison will be provided in the 2024 report.

In 2023, all projects except the Greek PV Project experienced an increase in energy generation compared to the previous year. Notably, the Flores Wind portfolio achieved an impressive increase of over 50% in generated GWh. Overall, considering the total energy generated, there was an 18.74% increase from 2022 to 2023.

The special case of Roadrunner, where production increased by 235%, is due to the fact that it was under construction and not yet operational during the previous reporting period. As a result, its energy generation in 2023 significantly outpaced the previous year, where the output was essentially zero.

Our strategies towards energy production efficiency

With significant potential across our projects in Europe, we continuously implement strategies and technologies to maximize energy output and ensure long-term sustainability.

An innovative approach we're implementing to enhance energy generation effectiveness is the hybridization of wind and solar projects. While photovoltaic plants generate energy only during daylight hours when sunlight is available, wind farms can produce energy throughout the day, independent of solar conditions. Solar energy production naturally fluctuates, with peak outputs during certain times and zero generation during others. By combining these two renewable sources, we can take advantage of their complementary strengths.

Wind turbines can offset periods of low or no solar energy production, ensuring a more stable and consistent energy output across the portfolio. This hybridization strategy helps to maximize the efficiency of our renewable energy generation.

In relation to wind farms, one of our key initiatives is to reduce the number of existing turbines in our wind farms while maintaining the installed capacity. By enhancing the generation capacity of each turbine, we aim to sustain the overall energy output, achieving the same levels of energy production with fewer turbines in our farms.

In addition to this, we also have a battery storage project designed to capture any excess electricity that is produced but cannot be immediately fed into the grid when production exceeds grid capacity. Instead of wasting this surplus energy, we utilize batteries to store the electricity for a defined period. This stored energy can then be released into the grid as soon as capacity allows, ensuring that no renewable energy is lost and optimizing the overall efficiency of our energy production.

Also, this year, we have continued to leverage the backtracking method in our tracker operations. This backtracking optimizes production and prevents degradation by adjusting the positioning of trackers to avoid shadowing. Our sustained use of this method has contributed to achieving the highest generation of GWh compared to the previous year, reflecting our continuous improvements and commitment to efficient renewable energy production.

Lastly, to ensure the long-term success of our initiatives, we prioritize constructing projects that are built to endure their full expected lifetimes—20-25 years for onshore wind farms and 25 years for solar PV installations.



4.3 Pollution

4.3.1 Air Pollution

The only source of air pollution associated with our activities is greenhouse gas emissions. These emissions originate from various activities as previously seen.

In Spain, managing and controlling vehicle emissions is particularly challenging due to our reliance on rental vehicles and subcontracted O&M external companies. This dependency complicates the tracking of fuel consumption and vehicle types, as we do not have an internal system specifically implemented for this purpose. To address this issue, we plan to introduce a vehicle leasing program during 2024 and 2025. This initiative will enable us to monitor fuel consumption and associated emissions, with the aim of incorporating hybrid vehicles into our fleet to enhance our environmental responsibility and reduce our carbon footprint.

In the coming years, we aim to address Scope 3 of our carbon footprint (including internal trips and commute) to gain a comprehensive understanding of all emissions, providing a complete picture of our greenhouse gas emissions.

4.3.2 Water Pollution

Recognizing the importance of preventing water pollution, we prioritise minimizing the impacts on water resources across all operations.

In our photovoltaic plants, water is primarily used for cleaning solar panels. The accumulation of dust can significantly reduce the efficiency and productivity of these panels, making regular cleaning essential for optimal performance. Effective water management practices are crucial to ensure that the cleaning processes do not lead to water contamination. In all CTGE's photovoltaic plants, the wastewater is directed to a septic tank, which is maintained through a scheduled plan for periodic removal by an authorized waste management service.

Moreover, potential water pollution during the construction phases of new photovoltaic plants must also be considered, especially if they are located near water bodies. This is exemplified by the Belvis I, II, and III photovoltaic plants, which were under construction throughout 2023. Located near a stream, these sites have undergone water sampling carried out by environmental partners from June to December 2023 at various discharge points. All samples showed negative results for water contamination, remaining well below the local and regional legislative thresholds in Extremadura.

In the case of our wind farms, the potential for water pollution is primarily associated with our offshore wind project in Germany. WindMW conducts constant monitoring of the sea area in the MeerWind offshore wind farm, including regular investigations and sampling of fish to assess the impact on marine life. Additionally, a zero-discharge policy mandated by authorities (BSH) is strictly enforced to prevent water pollution. Constructive measures such as barriers are incorporated into the design to further mitigate any potential environmental impact.



Photo by Daniel Rodríguez Robledo

4.3.3 Soil contamination

Soil contamination, like water pollution, is diligently monitored through regular visits and inspections conducted by our environmental partners. These inspections are particularly critical in areas near transformers, including substations and medium voltage transformation zones within our photovoltaic plants. During these inspections, special attention is given to detecting oil stains and assessing the condition of retention trays to ensure there are no signs of contamination.

For our wind turbines, both external and internal conditions are scrutinized. Externally, inspections focus on components such as the tube, beach, and ferrule, while internal inspections assess the condition of the turbines for potential leaks of oil, grease, hydraulics, and other substances. These thorough inspections are crucial in preventing soil contamination and maintaining the integrity of our renewable energy sites.

In 2023, we addressed a significant soil contamination incident within the Horus Portfolio. Specifically, in the La Boga wind farms, 34 tons of contaminated soil were removed in February and June due to an oil leak from turbine number 12 in the Perul project. The contaminated soil was treated as hazardous waste to ensure proper management and prevent recontamination of the environment. Following the removal, the affected soil was restored, ensuring that the area was returned to its original state.

4.3.4 Contamination of living organisms and food resources

Through comprehensive monitoring, tracking, and inspection measures, we strive to mitigate any potential adverse effects on local wildlife and ecosystems. These proactive steps ensure that our operations are conducted responsibly, minimizing any ecological disruption.

Regarding aquatic fauna, no incidents of contamination have been detected, as our activities have not resulted in water pollution.

On land, the soil contamination incident within the Horus Portfolio could have potentially affected microfauna and small arthropods such as insects and arachnids. However, our thorough inspections and subsequent actions have confirmed that no mammals or birds were impacted by this incident. Additionally, there has been no detected impact on food resources across any of CTGE's portfolios, ensuring the safety and sustainability of local agriculture and food supplies.

By maintaining rigorous environmental standards and continually improving our monitoring practices, we aim to ensure that our renewable energy projects coexist harmoniously with the natural world.

4.3.5 Substances of Concern and High Concern

Substances of concern and very high concern are chemicals identified by the European Union as posing significant risks to human health and the environment. These substances are typically categorized based on their hazardous properties, which include being carcinogenic, mutagenic, reprotoxic (CMR), persistent, bioaccumulative and toxic (PBT), or very persistent and very bioaccumulative (vPvB). The regulation and management of these substances fall under the purview of the European Chemicals Agency (ECHA) and are governed by the REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals) regulation.

It requires companies to register and provide detailed information about the substances they manufacture or import. ECHA evaluates this information to identify substances that may pose serious risks.

Wind turbines are primarily constructed from materials designed to withstand environmental stress and ensure efficient energy production. The main components include rotor blades made from fiberglass for durability and lightweight efficiency, steel towers for structural support, nacelles housing critical components like the gearbox and generator made from steel and aluminum, and hubs connecting the blades to the main shaft, typically crafted from cast iron or steel.

Solar panels, on the other hand, are built with several key materials to optimize energy conversion, mostly made of glass, aluminum and silicon.

Aside from the mentioned materials, CTGE does not identify any other substances classified as high concern or very high concern in its activities.

4.3.6 Microplastics

Reducing microplastics is a critical issue for the European Union, given their significant contribution to global pollution.

However, none of CTGE's activities are associated with the generation of microplastics or contribute to their contamination of the environment. Our operations in renewable energy production focus on wind and solar power, which do not involve processes that produce or utilize microplastics. This ensures that CTGE's environmental impact remains aligned with sustainable and eco-friendly practices.



Photo by Carlos García Sanjuán

4.4 Water and Marine Resources

4.4.1 Water

At CTGE, we carry out an exhaustive control of the water used in our plants. The primary use of water in our wind farms is for sanitary purposes and irrigation.

In our photovoltaic plants, water is mainly utilized for irrigation and maintenance of the vegetation and greenscreens planted on the assets. This irrigation is carried out rationally, predominantly during the first and second years of the plant's life and during periods of extreme heat. This accounts for more than 90% of the total water consumption across all projects. To optimize this usage, irrigation is done in the mornings, with precise calculations of the required liters, often utilizing drip irrigation systems.

These green screens, made up of native plants, facilitate project integration by minimizing landscape impact, reducing erosion, and enhancing organic carbon in the soil. An Irrigation Plan has been developed to meet vegetation water needs based on weather conditions, ensuring efficient water use. Additionally, we have a revegetation program to determine the optimal planting times.

Another of our water consumption comes from photovoltaic modules cleaning. We prioritise roller cleaning techniques, as they consume the least water when conditions allow. The cleaning plan is flexible and considers weather forecasts, postponing cleaning if rain is expected in the coming days. This adaptive approach helps us conserve water while maintaining the efficiency and longevity of our solar panels.

Water Consumption

Water consumption per project in 2023:

Assets	Water consumption (m³) 2023
Daylight PV portfolio (Spain)	1,176.60
Horus portfolio (Spain)	0.00
Flores Wind portfolio (Spain)	0.00
Roadrunner PV portfolio (Spain)	6.64
MeerWind Project (Germany)	-
Greek Project	-
TOTAL	1,183.24

The reason why Horus and Flores portfolios report no significant water consumption is because they consist entirely or predominantly of wind farms, where the only water usage is limited to the sanitary facilities at the installations. Due to the minimal nature of this water usage, it has not been possible to obtain direct consumption data for these portfolios.

This year, we were unable to collect water consumption data for our projects in Germany and Greece.

We are working to improve our data collection systems to ensure comprehensive accounting of water usage in the future. Data from our offices are not included because the water consumption is managed by the building's community.

Water Discharges

In our assets, all water used is directed to septic tanks, which are periodically treated to prevent contamination.

The only discharges recorded in 2023 occurred during the construction of the Belvis I, II, and III photovoltaic plants. As previously mentioned in the water pollution section, water used during these phases was discharged into a nearby stream. Comprehensive testing, analysis, and sampling were conducted, consistently showing that water quality remained favourable and below the established control parameters.

In Germany, our MeerWind offshore wind project adheres to a strict zero discharge policy, enforced by local authorities (BSH). This policy includes regular monitoring and preventive measures to ensure no harmful discharges occur, safeguarding the marine environment.



4.4.2 Marine Resources

While CTGE does not directly utilize marine resources in its operations, our offshore wind farm located in the North Sea off the coast of Germany indirectly interacts with these resources.

The MeerWind project leverages the advantageous location and robust marine winds, which are more efficient for energy generation compared to onshore winds. This strategic use of marine winds enhances the overall efficiency and sustainability of our renewable energy production, contributing significantly to our clean energy goals.

The positioning of the offshore wind farm allows us to take advantages of the natural marine environment to generate substantial amounts of renewable energy, underscoring the indirect but crucial relationship between our operations and marine resources.

To minimize the impacts on the marine environment resulting from this project's activities, CTGE is conducting new studies and developing innovative technologies aimed at reducing interference and ecological impact. In January 2024, the SUBSEACAM project was launched, becoming our first research and development initiative in Europe and marking a significant milestone in technological innovation and environmental responsibility.

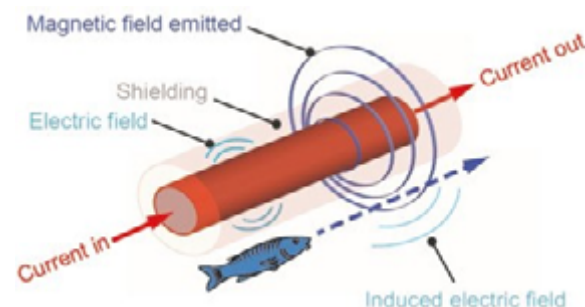
The SUBSEACAM (SubSea Electromagnetic Assessment of Cables via Autonomous Monitoring) R&D project supports the MeerWind offshore wind farm, aiming to protect both our infrastructure and the marine environment by pioneering methods that set new standards for sustainable energy production.



This project focuses on the integrity and environmental impact of subsea power cabling, ensuring the reliability and sustainability of our offshore wind assets. It involves the use of Autonomous Underwater Vehicles (AUVs) to perform electromagnetic field (EMF) mapping, serving two main purposes: assessing the feasibility of evaluating electrical damage in offshore subsea power cables and ensuring the environmentally safe coexistence of marine species with these cables.

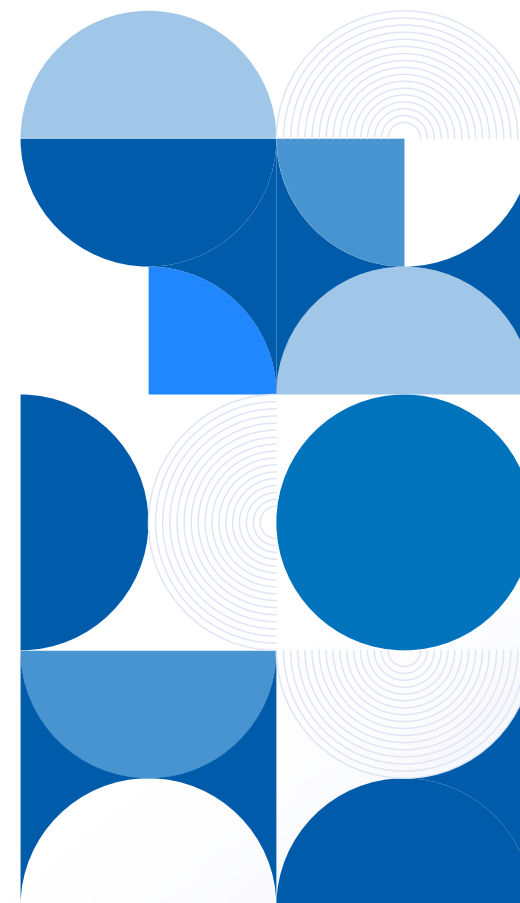
The AUVs, equipped with advanced EMF sensing technologies, conduct detailed surveys to detect and analyze the effects of subsea cables on marine life. This data informs strategies to mitigate any adverse impacts, promoting a harmonious balance between energy infrastructure and marine ecosystems. Our collaboration with INESC TEC, known for their expertise in AUV development, positions the SUBSEACAM project at the forefront of sustainable offshore energy research.

For independent power producers like CTGE, integrating ESG factors into our projects is not only a responsibility but also a strategic imperative. This project reflects our proactive approach to addressing environmental impacts, fostering innovation, and ensuring the sustainable development of our energy assets.



Discharges into the Oceans, Extractions and Use of Marine Resources

CTGE has not conducted any discharges into the oceans, nor has it carried out any extractions, or use of marine resources beyond what was discussed in the previous section on marine resources.



4.5 Biodiversity and Ecosystems

4.5.1 Factors that have a direct impact on biodiversity loss

To ensure that projects are developed in a sustainable manner and with the least possible impact on the environment, environmental impact studies are carried out prior to their construction. With these studies, the potential environmental impacts of each project are identified and evaluated.

Solar photovoltaic plant and wind farm projects, both offshore and onshore, have various impacts on the environment. The main impacts of each type of installation are described below:

Photovoltaic Solar Plants

- **Land use:** Solar plants require large tracts of land, which can lead to significant modifications in land use and loss of natural habitats. This can disrupt the existing ecosystems and reduce the biodiversity of the area.
- **Flora and fauna:** The installation of solar panels can affect local vegetation and animal species through habitat loss, habitat fragmentation, and disturbances during the construction phase. These changes can displace wildlife and alter the natural landscape.
- **Water resources:** Solar plants can also impact local water resources, particularly during the construction phase when water is used extensively for dust suppression and other activities.

Onshore Wind Farms

- **Land use:** The construction of onshore wind farms requires the building of roads and other infrastructure, which can fragment habitats and disrupt local ecosystems.
- **Impact on aerial fauna:** Wind turbines can cause collisions with birds and bats, posing a significant threat to these species. This impact is especially concerning for migratory birds and local bat populations.
- **Noise:** Wind turbines generate noise, which can disturb local fauna, especially species that are sensitive to sound.

Offshore Wind Farms

- **Impact on marine life:** The construction and operation of offshore wind turbines can affect marine life, including fish and marine mammals. The physical presence of the turbines and the noise generated can disrupt marine habitats.
- **Underwater noise:** Both the construction and operation of offshore wind farms generate underwater noise, which can affect marine mammals and other aquatic species that rely on sound for communication and navigation.

Compensatory measures

A series of transversal measures are implemented in order to minimize these environmental impacts and promote biodiversity across all the renewable energy projects. These measures ensure a consistent approach to environmental stewardship and sustainability.

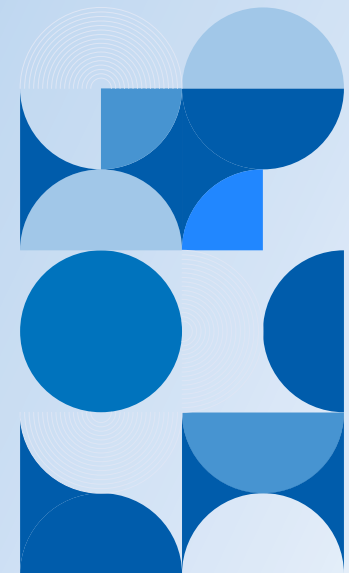


Photo by ICMA

Furthermore, with the construction authorization of each project, a set of actions are also carried out to counteract or mitigate the negative impacts caused on the environment. The compensatory measures typically focus on:

Mitigation of environmental impacts

Ecosystem restoration

Recovery of degraded or affected areas, restoring natural habitats and reintroduction of native species.

Creation of new habitats

Development of new habitats that can accommodate species displaced or affected by the project.

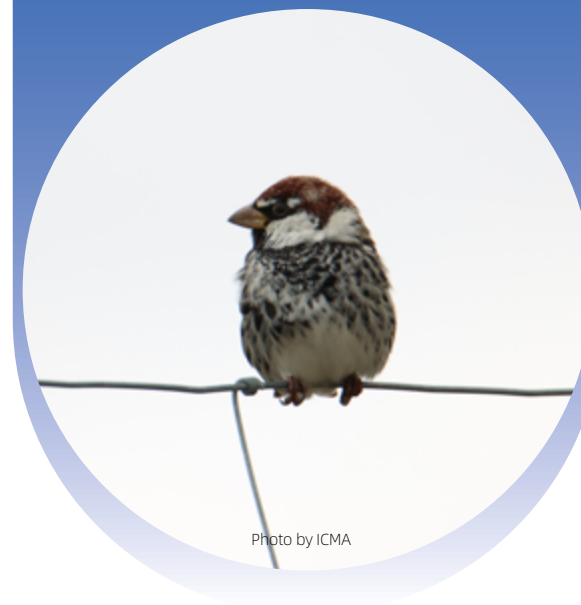
Biodiversity conservation

Protection of threatened species

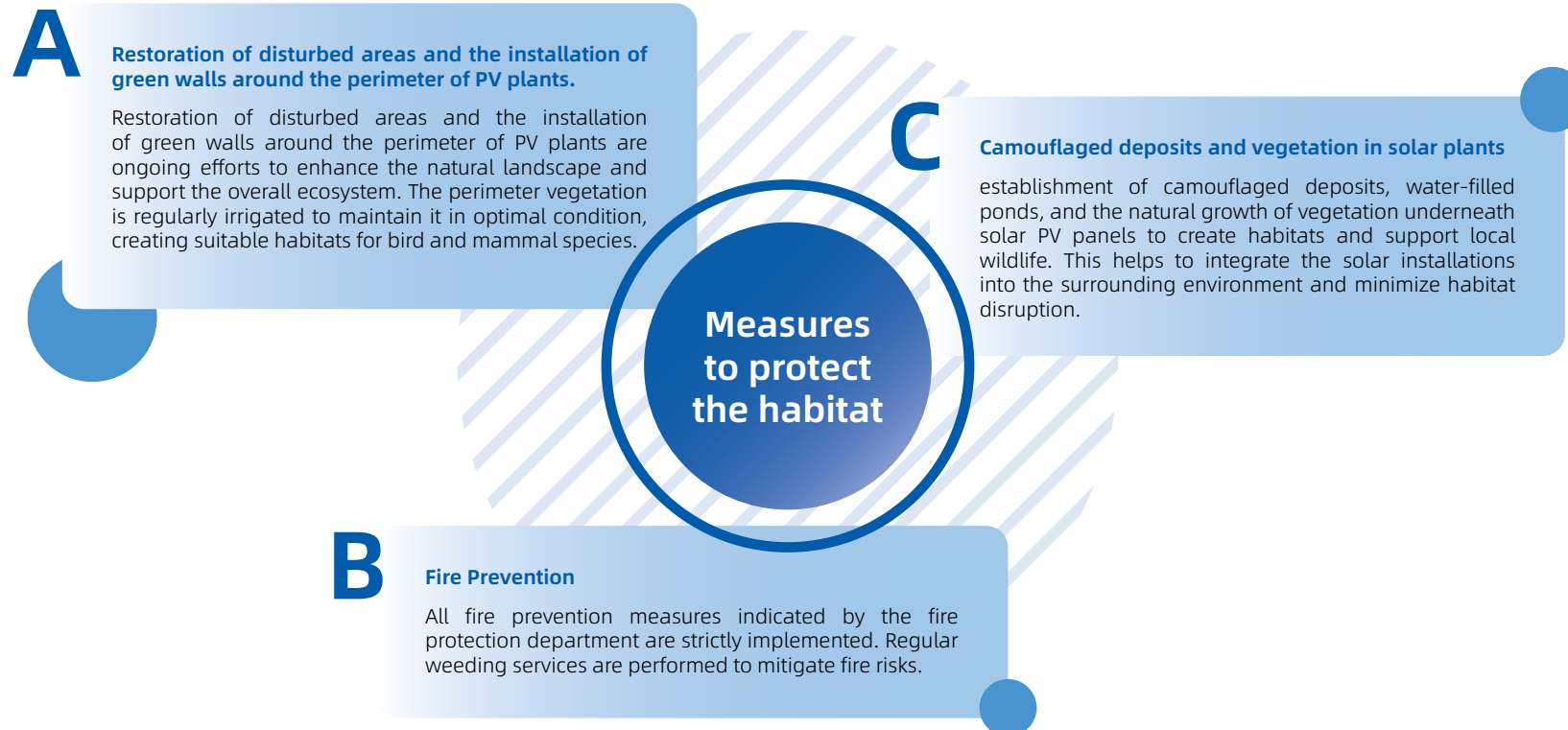
Implementation of specific actions to protect and increase the population of endangered or vulnerable species

Improving ecological connectivity

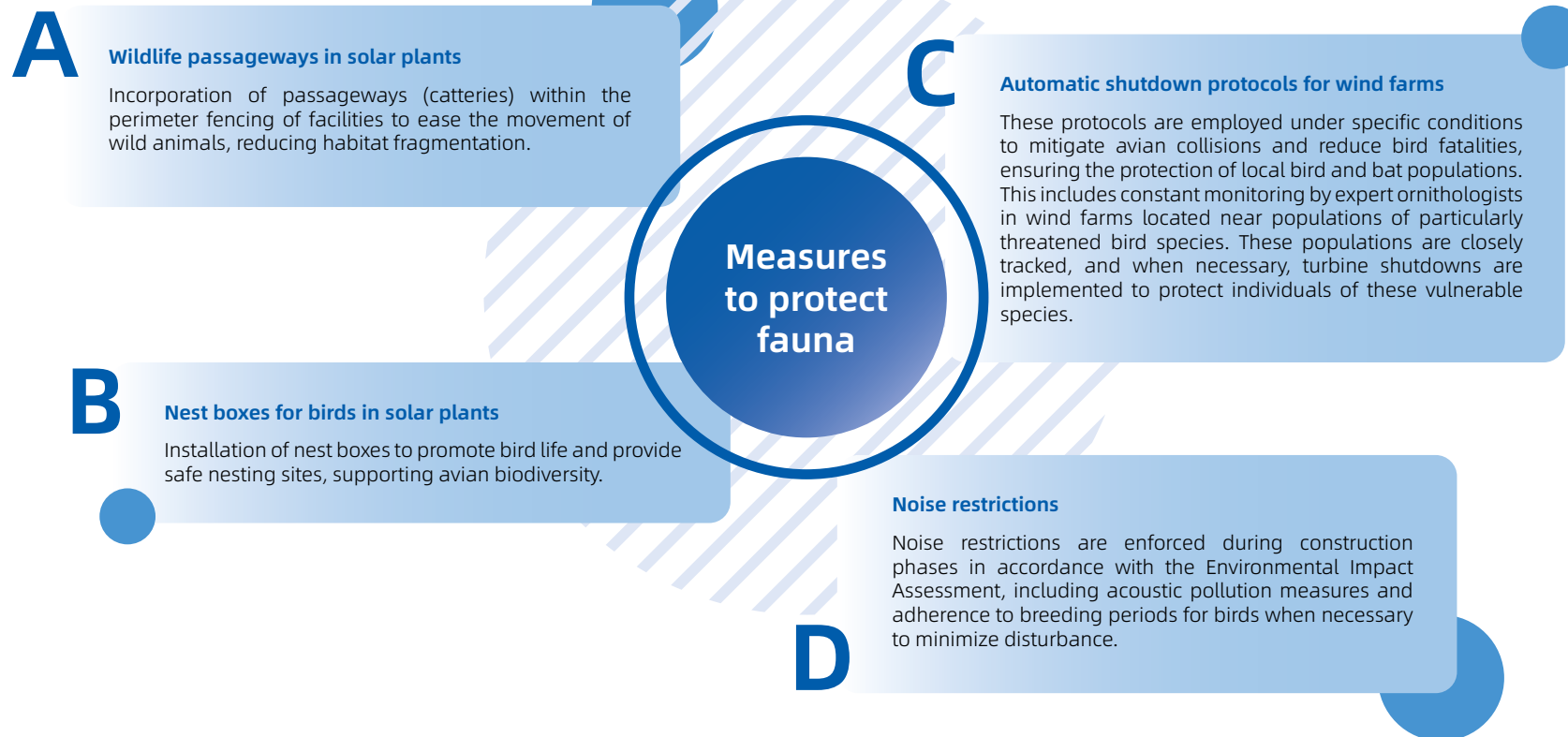
Creation of ecological corridors that facilitate the movement and dispersal of species.



The key transversal measures include the following actions:



The key transversal measures include the following actions:



The key transversal measures include the following actions:

A

Prohibition of pesticide usage in solar plants

Prohibition of pesticide usage within solar PV facilities to protect local wildlife and promote a healthy ecosystem.

B

Plantation and maintenance of native species

Native plant species are planted in the perimeter barriers of PV plants to enhance the natural landscape. These plants are maintained according to their specific needs, ensuring their healthy growth

**Measures
to protect
flora**

In addition to the transversal measures, each portfolio implements specific measures tailored to their unique environmental contexts. These measures will be detailed in the next sections.

4.5.2 Impacts on species status

Through our renewable energy generation activities, is evident that we are not exempt from impacts on local fauna populations, mostly avifauna.

CTGE, through its renewable energy generation activities, is not exempt from impacts on local fauna populations, mostly avifauna. This is especially evident in the case of wind farms, where both the electrical lines and the turbine blades can cause accidents leading to the deaths of bird and bat species. Recognizing this, CTGE has implemented comprehensive monitoring programs to track and mitigate these impacts.

During 2023, CTGE conducted monitoring of wildlife fatalities in the Horus and Flores portfolios, the two wind farms in Spain.

The results of this monitoring revealed that in 2023, the Flores Wind Portfolio experienced fatalities among 53 different bird species and 6 distinct bat species. In total, 165 birds and 20 bats were found deceased as a result of collisions with wind turbines. Additionally, it is important to note that not all fatalities were due to turbine collisions; some were caused by interactions with the electrical lines used for energy evacuation from the wind farms, and not only our electrical lines.

Notably, several of these species are listed in the Spanish National Catalog of Endangered Species (CNEA), including the *Nyctalus lasiopterus* (Special Interest) and *Milvus milvus* (Endangered).

The results of the Horus monitoring showed that in 2023, 27 birds were found deceased as a result of collisions with wind turbines, mainly *Gyps fulvus* and *Buteo buteo*. Notably, both species are listed in the CNEA, classified as species of Special interest.

This highlights the significant impact of wind turbines on local wildlife and underscores the importance of ongoing monitoring and mitigation efforts to protect these vulnerable species.



Photo by Daniel Rodríguez Robledo

Compensatory measures

To mitigate these impacts on local species populations and to prevent the occurrence of further impacts, we have implemented a series of compensatory and preventive measures that are specifically tailored to the context and needs of each project.



Flores. 12 wind farms in operation with 181 MW of installed power, 11 in Cádiz and 1 in Tarragona

Monitoring program of golden eagle and Bonelli's eagle

To mitigate these impacts on local species populations and to prevent the occurrence of further impacts, we have implemented a series of compensatory and preventive measures. We conducted a comprehensive voluntary monitoring program during 2023 for a pair of golden eagles (*Aquila chrysaetos*, a species of special interest) and a pair of Bonelli's eagles (*Aquila fasciata*, a species classified as vulnerable) at the Serra Voltorera wind farm, part of the Flores portfolio. This monitoring included tracking the reproductive events and evaluating ecological conditions, particularly in terms of food availability for these eagles. The studies began after identifying the presence of these pairs in the vicinity of the wind farm, prompting environmental authorities to request an appropriate monitoring program.

The management and monitoring program for the golden eagles and Bonelli's eagles included several compensatory and corrective measures, focusing on habitat management and improving conditions for prey species such as rabbits. Key actions included vegetation management, creating burrows for rabbits, and repopulating selected areas with this species. These efforts aimed to increase prey availability for the eagles, thereby enhancing their reproductive success and reducing potential negative impacts of the wind farm on these birds.

The monitoring results showed that both pairs of eagles used hunting areas linked to zones with high prey density, and measures were implemented to improve the quality of these habitats. Despite these efforts, the monitoring indicated that the golden eagles did not successfully reproduce during 2023, although the specific causes of this failure were not determined.

This program has not only provided a better understanding of the behaviour and needs of golden and Bonelli's eagles but has also highlighted the importance of active management and continuous monitoring to mitigate environmental impacts associated with the operation of wind farms. We have implemented measures that are specifically tailored to the context and needs of each project.

Photo by Antonio J. Bolaños





Flores. 12 wind farms in operation with 181 MW of installed power, 11 in Cádiz and 1 in Tarragona

Monitoring program of Ibis eremita

We are also committed to the conservation of the northern bald ibis (*Geronticus eremita*). The northern bald ibis is classified as one of the ten most threatened bird species in the world according to the Red Book of Birds (IUCN, 2008), and was identified in 2012 by the London Zoological Society as one of the 100 species most at risk of extinction. Recently, its status in the IUCN has improved from 'Critically Endangered' (CR) to 'Endangered' (EN).

In line with our goal not only to minimize the environmental impact of our projects but also to enhance and promote the environment, CTGE voluntarily monitors and tracks individuals of the northern bald ibis in our Janda I (PE Tejonero and PE Mostaza) and Janda III (PE Cerro Conilete, PE Loma del Suyal, and PE Lomas de Peñuelas) wind farms. This monitoring supports the Eremita Project of the Andalusian Government by contributing valuable data from our observations.

To ensure the safety of these endangered birds, we have stationed expert ornithologists in the area who closely monitor the populations. By tracking their movements and positions, we can proactively prevent collisions with the wind turbines. When a risk is identified, we implement turbine shutdowns to safeguard these birds, further demonstrating our commitment to their protection.

Periodic censuses of fauna and shut down protocols

The specialised ornithologist also conducts regular monitoring to identify the species present in and around the wind farms. This helps gather information on the presence of various species, understand local wildlife populations, and prevent potential incidents. When a risk is identified, especially during breeding seasons, we implement turbine shutdowns to safeguard these birds, further demonstrating our commitment to their protection.



Photo by ICMA



Horus. 12 wind farms in operation with 400 MW of installed power in Castilla y León, and a solar plant with 4MW of installed power in La Rioja.

Periodic censuses of fauna and shut down protocols: for avoiding collision of birds

In the Horus portfolio, we conduct a monitoring with the performance of monthly follow-ups, with a double frequency during migratory seasons (pre and postnuptial). It also helps us to identify and track the bird species living in the area.

This systematic approach helps maintain a comprehensive understanding of the local avifauna and their population dynamics. The monitoring program involves detailed recording of bird sightings, including the proximity of these sightings to the wind turbines. When a risk is identified, especially during breeding seasons, we implement turbine shutdowns to safeguard these birds, further demonstrating our commitment to their protection.

This data collection is crucial for assessing potential risks to bird populations and implementing effective mitigation strategies to minimize the impact of wind farm operations on local wildlife. By continuously updating these records, CTGE ensures proactive management of biodiversity and reinforces its commitment to environmental stewardship.





Daylight. 13 solar plants in operation with 572 MW of installed power in southern Spain, except for the Perogordo solar plant located in Segovia.

Agreements with property owners to increase nesting areas

Throughout the life of the project, agreements are established with adjacent landowners to increase potential nesting areas by 50% of the project area. This can include creating artificial nesting structures and protecting natural areas. This measure helps increase nesting opportunities for local birds, increasing the population of native species and promoting biodiversity.



Road Runner. 3 solar plants in operation with 139 MW of installed power in southern Spain

“Primillar” Construction and hacking:

A structure built specifically so that birds of prey, such as kestrels and owls, can nest and reproduce. The hacking technique involves breeding chicks in captivity until they are strong enough to be released into the wild.

This measure is carried out to increase the population of local birds of prey and promote their reintegration into the natural environment, improving the biodiversity of the area.

Construction of “majanos”

To provide shelter and promote local fauna, improving the ecological balance and supporting natural food chains, majanos are built. Majanos are mounds of stones or debris artificially constructed to provide shelter for small mammals such as rabbits. These refuges also benefit natural predators of these mammals.



Belvis I, II and III. 3 solar plants in the construction phase with 104.5 MW of installed power in Extremadura.

During the construction phase, the following compensatory measures have been implemented:

Noise analysis

Noise analyses were conducted to minimize interference with the natural wildlife and to respect the breeding seasons of the species present in the area.



Greek project. 4 solar plants in operation with a capacity of 18 MW.

Noise level control

Installed equipment operates with noise levels below 50db to minimize acoustic pollution and its impact on the surrounding environment.



MeerWind project. A windfarm in operation with 288 MW of installed power in the Germany North Sea.

Fauna research and monitoring

WindMW GmbH supports research projects to monitor the flora and fauna in the MeerWind Farm. This includes studying the local marine life and terrestrial ecosystems to understand and mitigate potential impacts.



4.5.3 Impacts on the extent and state of ecosystems

CTGE's renewable energy projects, including both wind and solar farms, have been developed on sites that were either already constructed or prepared for construction at the time of acquisition. This approach means that CTGE has not directly altered the extent or state of ecosystems through the initial development of these sites. However, recognizing the potential impacts of these installations on local ecosystems, CTGE has implemented several strategies to mitigate these effects and promote ecosystem health.

Compensatory measures



Daylight

Construction of green screens

These screens can be made up of native trees, shrubs, and plants. This measure helps mitigate the visual impact of the solar plants, improve the landscape integration of the project, and provide additional habitats for local wildlife. Moreover, the perimeter barriers are designed to be permeable to allow the free movement of fauna, preventing habitat fragmentation and ensuring the continuity of local ecosystems.



Road Runner

Plots in sowing, fallow and free

Throughout the useful life of the plant, three agricultural plots with different uses will be managed: one in sowing (annual crops), another in fallow (land at rest) and one free plot (without agricultural intervention). The objective of this measure is to create and maintain a diversity of habitats that favor different species of flora and fauna, increasing the biodiversity of the environment.



Belvis

During the construction phase, the following preventive measures have been implemented:

Water analysis for contamination prevention

Regular water analyses are conducted to prevent contamination of nearby streams and aquifers. These analyses ensure that water discharged during construction meets quality standards, protecting local water resources. Monitoring and sampling have been carried out at various discharge points from June to December 2023, with all results complying with local and regional environmental regulations. This measure helps maintain water quality and safeguard the surrounding ecosystem.



Greek project

Transformer unit safety

Transformer units are free of oil with polychlorinated additives and are installed above collection ground sealed tanks capable of containing oil leaks, ensuring environmental safety.

Environmental protection program

Prevent the habitat degradation of the surrounding environment by no further construction besides the authorized implementation studies.



MeerWind project

Environmental incident reporting system

Implementation of an observation cards reporting system to document and address incidents with environmental relevance. This system ensures that any environmental concerns are promptly identified and managed.

I+D Projects

The innovative SUBSEACAM project, previously explain in marineresourcessection, is used to assess the environmental impact of subsea power cabling. Autonomous Underwater Vehicles perform electromagnetic field (EMF) mapping to evaluate the feasibility of detecting electrical damage in cables and ensure the safe coexistence of marine species with these infrastructures.

Zero discharge policy

Adherence to a strict zero discharge policy, enforced by local authorities (BSH), to prevent any harmful discharges into the marine environment. This policy includes regular monitoring and preventive measures to ensure no contamination occurs, protecting the marine ecosystem.

4.5.4 Impacts on ecosystem services and dependencies on these services

CTGE's dependency on ecosystem services, such as wind and solar energy, underscores the need for sustainable practices. By using renewable resources, CTGE contributes to the reduction of greenhouse gas emissions and helps mitigate climate change, which is a major threat to global ecosystems and the services they provide.

Given that CTGE's projects were acquired post-construction or on pre-prepared land, the direct impact on ecosystem services has been minimized. Nevertheless, the company is committed to enhancing the ecosystems where their projects are located, as mentioned in the above sections.



4.6 Circular economy

4.6.1 Resource inputs, including resource utilization

In the context of our operations, the management and utilization of materials for the maintenance of wind and solar farms in Spain are primarily handled by subcontracted companies. These subcontractors are responsible for sourcing and utilizing all necessary materials throughout the year, and as a result, we don't directly track the resource inputs for these activities. In this regard, an aspect worth highlighting is the use of containers for the storage of spare parts instead of constructing permanent warehouses. This approach not only reduces the need for additional construction but also offers a more environmentally friendly and cost-effective solution.

However, to improve oversight and sustainability on the resource inputs, we are in the process of implementing an internal data collection system aimed at monitoring the use of materials and raw materials along the entire supply chain.

For projects located in Greece and Germany, CTGE is currently working on establishing a robust reporting system. The absence of adequate infrastructure for data collection has hindered the ability to extract detailed information on resource inputs for this year.

Regarding other aspects, the energy consumption, including electricity and fuel usage, is detailed in the energy section of this report. For the next sustainability report, CTGE expects to provide comprehensive information on the materials utilized across all projects. This will include both direct usage by CTGE and materials used through the downstream supply chain in subcontracted operations. This enhanced transparency and accountability will further align with CTGE's commitment to sustainable resource management and the principles of the circular economy.

The circular economy is critically important in the renewable energy sector, as it promotes sustainability, resource efficiency, and environmental stewardship. In the context of renewable energy projects, implementing circular economy principles helps to minimize waste, reduce resource consumption, and lower the overall environmental impact. This approach is essential not only for conserving natural resources but also for ensuring the long-term viability and cost-effectiveness of renewable energy infrastructure.

Related to the circular economy, we aim to extend the lifespan of our projects to avoid excessive use of materials and resources. By ensuring that our onshore wind farms and solar PV projects operate for their full 20-25 year lifetimes, as mentioned in the Energy section. This focus on longevity maximizes the use of existing resources and reduces the demand for new materials, reinforcing our commitment to the circular economy.

4.6.2 Waste

The internal management system for waste is continually being improved to ensure efficient control and documentation of each type of waste generated across our various installations in Spain, Germany, and Greece. By enhancing our waste management practices, we aim to maintain high standards of environmental responsibility and ensure that all waste streams are properly tracked, treated, and disposed of in a sustainable manner.

	Non Hazardous waste (t)	Hazardous waste (t)	Total waste (t)
Daylight PV portfolio (Spain)	42.60	0.63	43.23
Horus portfolio (Spain)	0.34	48.80	49.14
Roadrunner PV portfolio (Spain)	17.34	-	17.34
Greek Project	-	-	-
Board Office (Luxembourg)	-	-	-
Madrid office	-	-	-
Greece office	-	-	-
TOTAL	60.28	49.43	109.71

	Non Hazardous waste	Hazardous waste	Total waste
Flores Wind portfolio (Spain) (t)	0.02	16.82	16.84
Flores Wind portfolio (Spain) (septic sludge in m³)	9.00	-	9.00

*The data related to this portfolio is displayed in an separate table because due to its reporting in 2 distinct units of measurement.

	Non Hazardous waste	Hazardous waste	Total
MeerWind Project (Germany) (t)	2.50	24.14	26.64
MeerWind Project (Germany) (m³)	232.10	-	232.10

*The data related to this portfolio is displayed in an separate table because due to its reporting in 2 distinct units of measurement.

For Spain, the waste generated in our portfolios consists of various materials. Non-hazardous waste includes septic sludge, steel, iron, wood, plastic containers, oil filters, and components of photovoltaic panels. Hazardous waste includes contaminated plastic containers, fluorescent lamps, metal containers for pressurized gases, absorbents, and hydraulic oils.

A significant incident impacting our hazardous waste figures was the contamination of soil due to a hydraulic oil leak, as discussed in the soil pollution section. This incident resulted in the removal of 34 tons of contaminated soil from one of the wind farms in the Horus portfolio, leading to a substantial increase in the reported hazardous waste for the analysed portfolios.

In Germany, waste management is carried out by means of an electronic records management system introduced in coordination with our waste disposal specialist. Due to the fact that the quantities of waste generated in Germany have been reported in two different units of mass, tonnes and cubic meters, it impossible to add it and report it with the rest of the waste generated.

The non-hazardous waste generated includes a variety of materials such as plastic containers, iron, steel, cables, electronic equipment, and mixed waste from construction, demolition, and municipal sources. These materials are managed to ensure they are properly recycled and valorised wherever possible.

For hazardous waste, the types generated include waxes and greases, hydraulic oils, oily water, absorbents, and paints and adhesives. As well as with the rest of the projects, we are committed to managing these hazardous materials responsibly, ensuring they are treated and disposed of in accordance with environmental regulations to minimize any potential impact on the environment.

For the reporting period, we were unable to extract specific data on waste generated by our office locations. The available information pertains to the entire office building, and a disaggregated tracking system for waste produced by individual offices has not yet been implemented. It is important to note that all waste generated in the offices is classified as non-hazardous.

Greek project waste generation was also not available.

Waste valorization

Type of waste	Recycled waste (%)	Destroyed waste (%)
Non-Hazardous	100%	0%
Hazardous	47%	53%



Focusing on the waste generated by the projects in Spain, the 100% of the non-hazardous waste removed was used for subsequent recovery processes, mainly Energy recovery (R1), recovery of organic substances (R3), Recovery of metals and metal compounds (R4), Conditioning prior to recovery (R12) and Intermediate operations with destination for recovery (R13).

For hazardous waste, we also strive to ensure that the maximum amount possible is treated and recycled. In 2023, 47% of the hazardous waste generated was successfully recycled, while 53% left was allocated to D15 Intermediate operations with destination for disposal and direct deposit in landfill D5.

This higher percentage of destruction is primarily due to the significant volume of contaminated soil that had to be removed following a hydraulic oil leak. This waste represents the 99.6% of total hazardous waste generation in 2023.



Germany was unable to provide the proportion of valorised and non-valorised waste for this year's report, but efforts are underway to improve data tracking and control.

For Greece, there is not enough quality data to be provided in this report. However, the requirements of the environmental authorizations for the four projects in this country regarding waste are being complied:

- Oil residues from the transformers are adequately disposed of by the maintenance subcontractor according to legislative standards to authorized oil recycling company.
- Electrical, electronic and battery waste is properly stored. The company has registered to the waste producer platform and is in progress of assigning the proper disposal of the waste to an authorized recycling carrier.
- Photovoltaic modules waste is properly stored. The company is in the process of assigning the recycling to the authorized carrier.
- No fuel is stored in the stations.
- Any material incineration is prohibited.

5

**Social
Information**



5. Social Information

5.1 Own Personnel

This section highlights our commitment to creating a supportive workplace, maintaining ethical supplier relationships and our indirect interactions with consumers and communities impacted by our operations. Through this overview, we underscore our dedication to social responsibility and sustainable development.

5.5.1 Employment

Number of distribution of Employees by gender and age

Age	Men		Women		Total	
	2023	2022	2023	2022	2023	2022
18-24	4	3%	21	19%	2	3%
25-30	21	16%			17	23%
31-35	19	14%	35	31%	18	24%
36-40	26	20%			12	16%
41-45	30	23%	37	33%	6	8%
46-50	14	11%			7	9%
51-55	8	6%	13	11%	4	5%
56-60	6	5%			6	8%
60+	4	3%	5	5%	2	3%
Total workforce	132	-	111	-	74	-

Number of distribution of Employees by gender and professional category

Professional Category	Men		Women		Total	
	2023	2022	2023	2022	2023	2022
Management team	7	5%	7	6%	3	4%
Directors	21	16%	27	24%	5	7%
Technical Staff	104	79%	77	69%	66	89%
Total workforce	132	-	111	-	74	-

Number of employees by gender at the end of the year

	Men	Women	Total
2023	132	74	206

Average number of employees by gender

	Men	Women	Total
2023	45	40	85

Average employment annually by temporality, gender and age

2023 Age	Men				Women			
	Permanent	Temporary	Total	%	Permanent	Temporary	Total	%
18-24	4.00	0.00	4.00	3.03%	2.00	0.00	2.00	2.70%
25-30	21.00	0.00	21.00	15.91%	17.00	0.00	17.00	22.97%
31-35	18.00	1.00	19.00	14.39%	18.00	0.00	18.00	24.32%
36-40	25.00	1.00	26.00	19.70%	12.00	0.00	12.00	16.22%
41-45	30.00	0.00	30.00	22.73%	6.00	0.00	6.00	8.11%
46-50	14.00	0.00	14.00	10.61%	7.00	0.00	7.00	9.46%
51-55	8.00	0.00	8.00	6.06%	4.00	0.00	4.00	5.41%
56-60	6.00	0.00	6.00	4.55%	6.00	0.00	6.00	8.11%
60+	4.00	0.00	4.00	3.03%	2.00	0.00	2.00	2.70%
Total workforce	130.00	2.00	132.00	-	74.00	0.00	74.00	-

Total number and distribution of work contracts modalities on the 30/06/2023

Contract	Men				Women				Total	
	2023		2022		2023		2022		2023	2022
Permanent	130	98%	111	100%	73	99%	61	100%	203	172
Temporary	2	2%	-	0%	1	1%	-	0%	3	0
Total workforce	132	-	111	-	74	-	61	-	206	172

Average employment annually by temporality, gender and professional category

2023 Professional category	Men				Women			
	Permanent	Temporary	Total	%	Permanent	Temporary	Total	%
Management team	7.00	0	7.00	5.30%	3.00	0	3.00	4.05%
Director	21.00	0	21.00	15.91%	5.00	0	5.00	6.76%
Technical Staff	102.00	2	102.00	78.79%	66.00	0	66.00	89.19%
Total workforce	130.00	0	130.00	-	74.00	0	46	100%

Number of total dismissals by gender and age

Age	Men				Women				Total	
	2023		2022		2023		2022		2023	2022
18-24	1	7%	0	0%	0	0%	0	0%	1	0
25-30	5	33%	1	100%	2	100%	0	0%	7	1
31-35	2	13%	0	0%	0	0%	0	0%	2	0
36-40	3	20%	0	0%	2	0%	0	0%	5	0
41-45	2	13%	0	0%	0	0%	0	0%	2	0
46-50	1	7%	0	0%	1	0%	0	0%	2	0
51-55	0	0%	0	0%	0	0%	0	0%	0	0
56-60	0	0%	0	0%	0	0%	0	0%	0	0
60+	1	7%	0	0%	0	0%	0	0%	1	0
Total workforce	15	-	1	-	5	-	0	-	20	1

Average remuneration by gender and age

Age	2023			
	Men	Women	Average	% M/H
18-24	30,711.00 €	19,597.00 €	25,154.00 €	-36%
25-30	41,706.79 €	18,430.99 €	30,068.89 €	-12%
31-35	58,127.51 €	38,330.54 €	48,229.02 €	-34%
36-40	69,913.89 €	54,129.64 €	62,021.76 €	-23%
41-45	68,931.34 €	61,087.08 €	65,009.21 €	-11%
46-50	96,544.87 €	57,348.02 €	76,946.45 €	-41%
51-55	84,028.30 €	61,039.00 €	72,533.65 €	-27%
56-60	74,484.00 €	37,320.00 €	55,902.00 €	-50%
60+	51,288.00 €	78,000.00 €	64,644.00 €	52%
Total workforce	575,735.69 €	425,282.26 €	500,508.97 €	-23%

Number of total dismissals during 2023 by gender and professional category

Professional category	Men				Women				Total	
	2023		2022		2023		2022		2023	2022
Management team	0	0%	0	0%	0	0%	0	0%	0	0
Director	1	50%	0	0%	0	0%	0	0%	1	0
Technical Staff	12	50%	1	100%	1	100%	0	0%	13	1
Total workforce	13	-	1	-	1	-	0	-	14	1

Average remuneration by age and professional category

Professional category	2023			
	Men	Women	Average	% M/H
Management team	168,500.56 €	103,116.00 €	135,808.28 €	-39%
Director	91,249.11 €	87,709.13 €	89,479.12 €	-4%
Technical Staff	55,761.50 €	46,924.37 €	51,342.93 €	-16%
Total workforce	315,511.16 €	237,749.49 €	276,630.33 €	-25%

Remuneration for equal job positions or the average remuneration of directors and executives

Concept	2023
Men	174,488.74 €
Women	156,788.98 €
% Women/Men	-10%

The differences in salaries are due to the fact that, in the above-exposed case, the relevant working experience of each employee is the key factor in explaining the difference in their remuneration. Please note that the experience of the “Men” category is 9+ years more than the working experience of the sample registered in the “Women” category.

Digital Disconnection Policy

CTGE is dedicated to ensuring the well-being of its employees through a thoughtfully implemented Digital Disconnection Policy. This policy applies to all employees of China Three Gorges (Spain), S.L.U., and aligns with Spanish legislation to promote a healthy balance between work and personal life.

Spanish legal provisions, particularly Article 88 of the Organic Law on Data Protection and Guarantee of Digital Rights and Article 20 bis of Royal Legislative Decree 2/2015, serve as the foundation for this policy. These laws enshrine the right of employees to disconnect digitally outside of established working hours, thereby safeguarding their rest periods, leaves, vacations, and personal and family privacy.

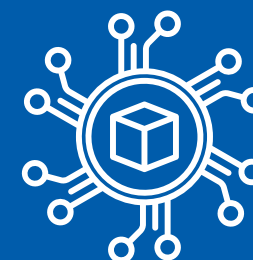
The key principles of CTGE Digital Disconnection Policy emphasize the respect for employees’ rest time outside of designated working hours, except in cases of force majeure or exceptional circumstances. Recognizing the challenges posed by operating across multiple time zones, the company makes concerted efforts to schedule meetings and communications at times that are convenient for all parties.

CTGE is committed to ensuring that adherence to this policy does not negatively impact employees’ performance evaluations or result in disciplinary actions unless their actions have caused harm to the company or their colleagues. The company practices good digital disconnection habits by avoiding emails and calls outside of working hours, including weekends, holidays, and vacations, except in urgent situations requiring immediate attention. Meetings are generally scheduled within official working hours to further support this principle.

To foster a culture of compliance and awareness, CTGE ensures that all employees are well-informed about the policy through initial training sessions and ongoing briefings. This helps employees understand the importance of digital disconnection and how to effectively adhere to the policy. Team leaders play a crucial role in promoting this culture and ensuring adherence.

Additionally, the policy is subject to periodic review and updates to address internal needs and legislative changes. Employees are encouraged to reach out with any queries or suggestions regarding the policy, ensuring continuous improvement and relevance.

CTGE’s Digital Disconnection Policy reflects the company’s commitment to fostering a balanced work environment. By prioritizing employee well-being and ensuring that digital connectivity does not encroach on personal time and privacy, the policy enhances employee satisfaction and contributes to the sustainable and responsible growth of the organization.



Employees with Disabilities

Employers with disabilities	2023
Men	2
Women	0
% Women/Men	-100%

All employees with disabilities are part of the workforce in Germany. There are no employees with disabilities in the other countries where CTGE operates.

5.1.2 Work Organization

CTGE in Spain operates under the framework of the “Madrid Offices and Desks Agreement”. This agreement sets the labor standards and conditions for office and administrative environments within the region.

It ensures that our operations adhere to local labor laws, providing a structured and regulated work environment for our employees.

This alignment helps maintain a consistent level of workplace rights, benefits, and obligations, thereby supporting CTGE’s commitment to fair and ethical employment practices in its Spanish operations.

However, in Germany, there is no collective agreement covering the workers, as is the case in Spain. Instead, a works council represents the interests of employees in the company and can negotiate with the employer on their behalf. To this end, it has rights that are set out in the Works Constitution Act (BetrVG) and cannot be ignored by the employer. These rights are known as co-determination rights.



5.1.3 Health & Safety

Conditions of Health and Safety

CTGE considers health and safety as the top priority of the company, striving to instil this culture from the Safety and Environmental Office to all colleagues, including contractors and subcontractors, regardless of the type of work they perform.

This priority is reflected in the company's QHSE policy, focused on continuous improvement, meeting company objectives and KPIs, and the zero-incident policy. Additionally, the company protects the health of its workers and contractors through medical examinations and inspections in PV plants and wind farms, as well as in offices. Training sessions are conducted, worker and contractor behaviour is monitored, and work procedures and instructions are created, such as emergency plans and height work procedures, among others.

In 2023, CTGE staff did not suffer any work-related accidents. It is important for the company that workers participate in activities related to health and safety, taking their daily opinions and complaints into account through the SEO department, annual surveys, and the health and safety committee. This committee, led by the Company's CEO, meets quarterly to discuss actions taken, risks identified, and solutions implemented.

This committee is not based on the provision of personnel delegates or safety delegates, although CTGE does not oppose this practice and has not received association requests from workers.

Committed to health and safety, CTGE has implemented ISO 45001, certifying its offices in Spain, Greece, Germany, Luxembourg, and Portugal, as well as the photovoltaic plants of the Daylight portfolio, MeerWind project and Greece project. The company will continue incorporating new projects under ISO 45001 during 2024, 2025, and 2026.

In CTG Spain, 73% of employees underwent medical examinations.

A robust performance in QHSE management is a fundamental pillar in CTGE's business strategy, integrated into every process and activity undertaken by the group. This approach is essential for ensuring the health and safety of all employees, ensuring that the operations have the minimal possible impact in this regard.

CTGE is dedicated to being a QHSE best-practice organization and prides itself on full compliance with all applicable legislation in the regions where CTG operates.

According to CTGE's QHSE Integrated Management System, the company prioritises achieving steady investment, stable operation, and environmental protection to guarantee occupational health and safety by eliminating all preventable illnesses and injuries due to unplanned events. CTGE is committed to promoting the continuous improvement of the Integrated Management System in relation to QHSE performance.

The company establishes and reviews the objectives of the QHSE Integrated Management System, using the commitments contained in this policy as a reference, and ensures the provision of necessary resources, including time, skill, and funding, and information for its attainment. CTGE is dedicated to protecting the health of its employees and contractors, minimizing any adverse impact on the community and the environment by providing health and safety working conditions to prevent injuries and health problems. The company strives to achieve a 'zero incidents' working environment across all its sites.

Photo by Antonio J. Bolaños

CTGE meets all applicable quality, health & safety requirements, both mandatory and voluntary, and fulfills all occupational health & safety legal compliance obligations, such as Law 31/1995, Royal Decree 39/1997, which establishes the minimum health & safety regulations at work, and Royal Decree 486/1997, which sets the minimum health & safety requirements for workplaces.

Specific responsibilities identified in the QHSE Integrated Management System are clearly assigned to maintain a high level of health & safety protection, which includes clear management commitment and support for adopting high safety and environmental standards and fostering a positive culture of safety and environmental protection at all company sites.

The company applies best practices to prevent and reduce risks associated with its activities impacts and preventing pollution. CTGE consults with employees and representatives on health & safety matters and encourages the reporting of health & safety incidents to learn lessons and prevent the recurrence of similar incidents.

All safety and environmental protection guidelines are applied to CTGE business units, contractors, and other third parties involved in daily activities, implementing practical and appropriate working environmental protections and management procedures.

Regular team instructions and training are provided to maintain achieved safety performance standards. CTGE monitors, targets, audits, and assures QHSE best practices within the company and its most important contractors, proactively sharing health & safety information and good practices throughout the organization. Additionally, the company executes emergency planning for foreseeable health & safety and environmental emergencies.

Health & Safety Training for workers

In 2023, 227 hours of health & safety training, including GWO, first aid, and emergency action for coordinators, were conducted in-person to ensure direct engagement and practical learning. Additionally, 84 hours of training (42 people x 2 hours under Article 19), focusing on work at heights, rescue, first aid, and emergency actions, were delivered online, allowing the entire team to participate remotely.

Within those training hours, an in-person course was also conducted at our offices in Spain (Madrid and Gijón) covering first aid and building evacuation procedures in case of emergency.

In Greece, a 2-hour defibrillator usage course was conducted for office staff, and a 1-hour emergency evacuation course was held in case of earthquake or fire. At plants, a 3-hour course on emergency evacuation and orientation in case of fire or extreme weather phenomena was conducted alongside firefighters.

In Luxembourg, training sessions for emergency actions and first aid are planned for 2024.

Legal Control Tools

At the end of 2023, CTGE implemented two tools to help with the company's legal control through agreements with Worldlex and CTAIMA. The first tool focuses on legal control of industrial safety, worker health & safety, and environmental control, applying throughout Europe except Germany, with completion expected in 2024. The second tool, exclusive to Spain, establishes an access control for people, companies, or vehicles accessing the company's offices, photovoltaic plants, or wind farms, implemented since February 2024.

Periodic Inspections

CTGE actively promotes the SEO department to conduct inspections to check project standards in terms of safety and health. In 2023, the SEO team conducted and recorded 73 inspections of the company's 46 assets between O&M and construction, including inspections by third parties, such as I+P and others. These third-party inspections take place annually in the Horus and Flores portfolios.

A license for the Safety Culture program was also acquired, allowing the generation of complete reports through mobile devices, facilitating action planning and improving fieldwork efficiency.

Work-related accidents, occupational diseases, and the number of days lost due to work-related accidents, health problems, etc.

	Spain	Germany	Greece	Luxembourg
Number of accidents	0	0	0	0
Severity index	0	0	0	0
Frequency index (%)	0%	0%	0%	0%
Illness due to working	0	0	0	0

Notably, the company recorded zero incidents across several critical metrics. The frequency and severity of workplace accidents were non-existent, reflecting the efficacy of CTGE's preventive measures and safety protocols. Additionally, there were no reported cases of occupational diseases, underscoring the company's commitment to maintaining a healthy work environment. Furthermore, the number of days lost due to work-related accidents or health issues was zero, illustrating the overall effectiveness of CTGE's health & safety strategies. These results demonstrate the organization's dedication to ensuring the well-being of its employees.



5.1.4 Organization of work time

Organization of work time

At CTGE, various measures have been implemented to organize employees' working time, ensuring a balance between work and personal life while promoting overall well-being. The measures are as follows:

Working Hours Record

A monthly report of working hours is maintained for each employee. This monthly report allows detailed monitoring of working time, ensuring compliance with established hours and facilitating the management of schedules and tasks.

Reduction of Working Time During Summer

During the summer season, CTGE employees enjoy reduced working hours on Fridays. This measure aims to provide a better work-life balance, allowing employees to have more free time during the summer months.

Free Holiday on December 24th

All CTGE employees have a day off on December 24th. This measure is implemented so that employees can enjoy the Christmas festivities with their families and loved ones, promoting a more positive and motivating work environment.

Digital Disconnection Policy

CTGE, through its subsidiary China Three Gorges (Spain) S.L.U., has implemented a digital disconnection policy. This policy aims to ensure that employees can completely disconnect from their work responsibilities outside working hours, fostering a clear separation between work time and personal time.

Free Holiday on Chinese New Year's Eve and New Year

CTGE employees also enjoy a day off on Chinese New Year's Eve and Chinese New Year. This measure allows employees to celebrate this important cultural holiday, reinforcing diversity and respect for cultural traditions within the company.



Number of absence hours and workdays

Number of absence hours 2023

18,856.00

Reason	Number of absence workdays 2023
Work-related accident	0.00
Non work-related accidents	0.00
Illness	1,502.00
Maternity	500.00
Paternity	312.00
Extra free days	43.00
Total workforce	2,357.00

Measures aimed at facilitating the enjoyment of work-life balance and encouraging the co-responsible exercise of work-life balance by both parents

A variety of measures have been implemented to facilitate the enjoyment of **work-life balance** and to encourage both parents to equally share in work-life responsibilities. These measures include **teleworking**, which allows employees to work from home or other remote locations, thereby providing flexibility that helps them balance their professional and personal responsibilities more effectively.

CTGE also offers a **meal card**, enabling employees to purchase meals conveniently, supporting their daily meal expenses and contributing to their overall well-being. Additionally, a **transport card** is provided to cover commuting expenses, reducing the financial burden of transportation and facilitating easier access to the workplace.

To promote health and security, CTGE provides **health insurance** to its employees, ensuring access to necessary medical care and services. Complementing this, the company enrolls employees in an **employment pension plan**, securing their financial future post-retirement and reflecting the company's commitment to long-term employee welfare.

A **communication bonus** is offered to cover expenses related to communication tools and services, aiding employees in maintaining effective communication while working remotely. Furthermore, the company celebrates personal milestones with a **birthday cake allowance**, fostering a sense of appreciation and boosting employee morale, and by providing a present on an employee's work anniversary or upon the birth of a child (**anniversary/newborn child present**).

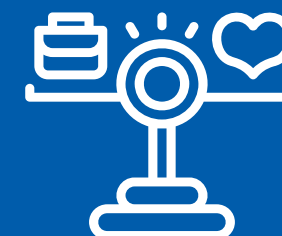
During the summer, **cooling fees** are covered to ensure a comfortable working environment, whether employees are working remotely or in the office. Additionally, employees benefit from **reduced working hours during summer**, particularly on Fridays, allowing them to enjoy more leisure time and maintain a better work-life balance.

For employees with young children, a **kindergarten ticket** is provided to help cover the costs of childcare, promoting work-life balance for parents. CTGE also grants **extra leave days**, including December 24th and two days during the Chinese New Year, enabling employees to spend quality time with their families during important holidays.

Lastly, the company offers **training courses during working hours**, allowing employees to develop their skills and knowledge without sacrificing personal time.

These measures reflect CTGE's dedication to creating a supportive work environment that values the well-being and **work-life balance** of its employees. By implementing these policies, the company encourages both parents to actively participate in balancing work and family responsibilities.

Country	%
Spain	100%
Germany	100%
Luxemburg	100%
Greece	100%
Portugal	100%



5.1.5 Social Relations

Organization of social dialogue, including procedures for informing, consulting and negotiating with personnel

CTGE is committed to maintaining an open and transparent social dialogue with all its employees. The company has established several communication channels and procedures to inform, consult, and negotiate with its staff, ensuring active participation in decision-making processes and enhancing workplace well-being. The Human Resources (HR) team plays a pivotal role in facilitating this dialogue.

The key communication avenues are as follows:

HR Mail (HR@ctgeu.com)

This dedicated email address is used for important individual comments and communications between employees and the HR team. It provides a confidential and direct line of communication for personal matters, queries, and feedback.

CTG Teams Group

The CTG Teams group is an online platform that facilitates group discussions and information sharing. It serves as a central hub for updates, announcements, and collaborative activities, ensuring that employees are well-informed and engaged.

Complaints Channel (Whistleblower Channel)

In accordance with the Law 2/2023 of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption, as well as other applicable legislation regarding the protection of crimes, CTGE provides a whistleblower channel.

This channel is designed to offer adequate protection against retaliation for individuals who report any actions or omissions. The available means to carry out these reports are:

- Through the form: Available on the company's internal platforms.
- By postal mail: Addressed to CTG Spain - ATT/Compliance Department, Calle del Príncipe de Vergara nº 112, 7th Floor, 28002.
- By email: Reports can be sent to compliance@ctgeu.com, describing the facts to be reported, in accordance with the minimum content specified below.
- By telephone: Calls can be made to +34 91 954 63 09, either for a conversation or to leave a voicemail that will reach the Compliance email address.

Optional information for confidentiality

- Name and surname of the complainant
- Email address
- Telephone number
- Additional documentation

Minimum Content of the Complaint

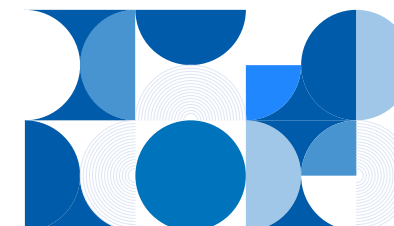
The report must include:

- CTG Relation
- Topic
- Reported facts
- Date of the facts
- People involved in the facts (if any)
- Country

Recipient of the Complaint

The Compliance Department at CTGE will receive the complaints. This department ensures confidentiality and full compliance with legal regulations, taking the necessary measures to satisfactorily process the complaint.

These communication methods underscore CTGE's commitment to effective social dialogue, promoting transparency, and ensuring that employees' voices are heard and considered in the company's operations.



Percentage of employees covered by collective agreements per country

Country	%
Spain	100%
Germany	0%
Luxemburg	100%
Greece	100%
Portugal	100%

As mentioned previously, in Germany, there is no collective agreement covering the workers, as is the case in Spain. Instead, a works council represents the interests of employees in the company and can negotiate with the employer on their behalf. To this end, it has rights that are set out in the Works Constitution Act (BetrVG) and cannot be ignored by the employer. These rights are known as co-determination rights.

Employees coverage by employee representatives per country

Country	%
Spain	100%
Germany	100%
Luxemburg	100%
Greece	100%
Portugal	100%



5.1.6 Training

The training program at CTGE is regulated through the China Three Gorges Europe S.A. Regulation of the Training Management, issued on 30th December 2020. In the 2023 training plan, CTGE provided employees with both internal and external training sessions.



It is arranged by the Human Resources Department and includes New Employees Orientation training, which is an 8-hour session conducted once per year, workshops such as on-site activities, Energy Markets (1 hour), and ISO Normative (1 hour).



It is conducted by external agencies, and it consisted of GWO training, courses from Udemy (individualized online training courses tailored to each employee's and department's needs), and language courses in Spanish, Chinese, and English, with online classes held for 1 hour per week.

This program aims to standardize training management, build a well-structured and high-quality workforce, and promote the improvement of staff skills to meet the company's demand for talents.

The **Human Resources Department** holds the primary responsibility for managing the training program. This includes establishing a training management system, directing and coordinating training activities across departments, facilitating resource sharing, gathering feedback from training participants, and managing training funds.

Each department is required to develop annual training plans based on their priority tasks and employees' training needs. These plans must be submitted to the Human Resources Department by the end of each year, which then compiles a comprehensive company-wide training plan for approval by the Chief Management Meeting.

Employees who wish to participate in external training or take exams listed in the **Vocational Qualifications Examination Catalogue** must complete the CTGE Training/Exam request form 30 days before the training or exam. Participation in training is linked to individual performance appraisals, and attendance must be confirmed at least 5 business days before the training. If the actual number of participants does not meet 50% of the planned number, the training will be rescheduled.

Training funds, which constitute **2.5% of CTGE's overall salary**, cover training course fees, related materials, and travel expenses. Instructors for internal training, who are typically senior managers or above, are eligible for allowances based on the complexity and timing of the courses.

Employees are obliged to adhere to training schedules and management requirements. Non-compliance, such as attending unapproved training or failing to complete training without proper cause, can result in disciplinary actions including non-reimbursement of training fees and wage deductions.

Furthermore, if an employee resigns or is dismissed for gross negligence within 35 months after completing a training course, they are required to refund a portion or all of the training expenses to the company. The exact amount depends on the time elapsed since the completion of the training.



The Human Resources Department is responsible for monitoring training activities, correcting non-compliance, and ensuring effective implementation of training plans. The department also manages the reimbursement process for training expenses and handles any discrepancies in the interpretation of training regulations.

Attachments to the regulation include the Vocational Qualifications Examination Catalogue and the CTGE training/exam request form, listing specific qualifications such as Chartered Financial Analyst (CFA), Financial Risk Manager (FRM), and various accounting and compliance certifications.

Nº of employees covered by an union representative per country

Professional category	2023
Management team	152.00
Supervisor	594.00
Technical Staff	3,104.00
Total workforce	3,850

Training expenses

2023		
Training expenses	Human Resources	51,502.20 €
	QHSE	8,376.75 €
Total		59,877.95 €

5.1.7 Universal accessibility for people with disabilities

Directive 2000/78/EC establishes a general framework for equal treatment in employment and occupation, prohibiting discrimination based on gender or disabilities in the workplace. The situation in 2023 brings new notices that in the offices and workplaces in Madrid already offer complete accessibility for people with disabilities, ensuring an inclusive environment for all employees.

The organization emphasizes its commitment to multiculturalism by forming a team with individuals from various continents, offering Chinese language training, and creating an employee template by region and nationality.

The company's commitment to equality and accessibility places special emphasis on individuals in unique biological or socio-labor situations, including those with recognized physical, mental, or sensory disabilities. The objective is to promote and facilitate their direct access and integration into the workforce and, indirectly, into society.

Moreover, the offices and workplaces in Madrid and Germany already offer complete accessibility for people with disabilities, ensuring an inclusive environment for all employees.

Our offices are equipped with elevators that provide unrestricted access for individuals with disabilities. Additionally, we offer spacious restrooms designed to accommodate wheelchair users, those with crutches, or individuals with reduced mobility. Our workspaces feature large desks with an electric height-adjustment system, ensuring that each table can be tailored to meet individual needs.

5.1.8 Equality

The organization is fully committed to complying with current legislation in all areas that may affect it. In compliance with Law 3/2007, of March 22, for the effective equality of men and women, we are engaged in a process of collaboration and development with external advisors specialized in this field to create the company's equality plan. This equality plan serves as an instrument to integrate equality into labor relations and all areas of management within our organization, thus advancing towards effective equality between women and men.

Protocols against sexual and gender-based harassment, integration and universal accessibility of persons with disabilities.

Spanish legislation, particularly the Workers' Statute and Organic Law 3/2007, mandates employers to ensure a workplace free from harassment, including both sexual harassment and harassment based on sex. Employers are required to implement specific measures to prevent and address harassment, which include creating and enforcing a harassment prevention policy, providing training for employees, and establishing procedures for reporting and investigating harassment complaints. Additionally, Royal Decree 6/2019, of 1 March, reinforces the necessity for companies to adopt comprehensive strategies to prevent and address harassment in the workplace.

Addressing workplace harassment is crucial for maintaining a safe and respectful work environment. Harassment can lead to significant psychological and physical harm to employees, reduce productivity, and damage a company's reputation. Implementing policies and measures to prevent and address harassment is essential for ensuring the well-being of employees and fostering a positive organizational culture.

In line with these legal requirements and its commitment to creating a safe and inclusive workplace, CTGE has drafted a comprehensive sexual and workplace harassment protocol, which will soon be formally issued and implemented. The protocol includes:



These measures are designed to protect employees, ensure a respectful and supportive work environment, and comply with Spanish legal standards. By taking these steps, CTGE demonstrates its dedication to upholding the highest standards of workplace safety and respect, contributing to the overall well-being and satisfaction of its workforce.

5.2 Value Chain Worker

Our **Code of Ethics** provides a robust framework for ensuring that all interactions with suppliers are conducted ethically and transparently, fostering mutually beneficial relationships based on trust and respect.

Compliance and Ethical Standards



Our suppliers are expected to adhere to the same high standards of ethics and compliance that we uphold within CTGE. This includes complying with all applicable laws and regulations, as well as our internal policies. We require our suppliers to avoid any forms of bribery, corruption, and unfair competition. Suppliers must also ensure that their business practices do not infringe on human rights and that they provide safe and fair working conditions for their employees.

Supplier Selection and Collaboration



We are committed to fair and transparent supplier selection processes. All suppliers are evaluated based on objective criteria, including quality, reliability, and compliance with legal and ethical standards. We avoid conflicts of interest and ensure that personal relationships do not influence supplier selection. Our aim is to build long-term partnerships with suppliers who share our commitment to ethical practices and sustainability.

Conflict Resolution



In the event of disputes or conflicts, we strive to resolve them amicably and fairly. We have established clear procedures for addressing grievances and ensure that all parties are heard and treated with respect. Our approach to conflict resolution is grounded in our commitment to fairness, transparency, and mutual respect.

Payment Practices



We are dedicated to maintaining transparent and fair payment practices. This includes timely and accurate payments to our suppliers, adhering to agreed terms and conditions. Our financial transactions are conducted with integrity, and we ensure that all payments are documented and traceable, thereby fostering a trustworthy and reliable business environment.



5.3 Affected Groups

Impact of the company's activities on employment and local development

CTGE has significantly contributed to local employment through the contracts for operation and maintenance of its solar plants and wind farms. This initiative is fostering local indirect employment, especially in areas where these plants are located. For solar plants exceeding 30 MW, CTGE has generated local employment by hiring two individuals per plant. Additionally, the company has created further jobs in environmental consulting and other services, although these numbers are more challenging to quantify.

Specifically, Horus O&M, managed by Ingeteam and others, employs 37 personnel, including O&M technicians, supervisors, back-office staff, and contract management, with an additional 6 to 8 personnel for the maintenance of other plants. Flores O&M, operated by Vestas and GE, employs 40 maintenance technicians, 5 supervisors and team leaders, and 5 back-office staff, along with 4 personnel specifically for Serra Voltorera.

Daylight O&M, managed by Eiffage and Xelio, employs 70 personnel, comprising maintenance technicians and back-office staff for contract management. The RR - Posadas and Manzanares projects, managed by Metka and CoxAbengoa, employ 15 to 20 personnel, including maintenance technicians and back-office staff. EXUS Asset Management Services, which oversees RR, Flores, and Horus, employs 25 personnel.

In total, approximately 200 individuals have been employed through these efforts, significantly boosting local employment and contributing to the economic development of the regions where CTGE operates. This commitment to local job creation not only supports the communities surrounding the solar and wind plants but also enhances the sustainable development goals of the company.

Impact of the Company's Activities on Local Populations and the Territory

CTGE consistently contributes to local economies through the recurrent payment of various taxes to municipalities, including Property Taxes (IBIs) and Construction, Installations and Works Taxes (ICIOs). Additionally, in the region of Castilla y León, the company pays an environmental tax known as ECOTASA, which is levied due to the presence of wind farms and certain electrical lines. These financial contributions support local infrastructure and public services, thereby positively impacting the socio-economic development of the communities where CTGE's operations are located.

CTGE's commitment to sustainability and positive community impact is exemplified through its proactive approach during the development of the Belvis I, II, and III 104 MWp Photovoltaic Solar Plant. The company has taken significant measures to mitigate and enhance the effects of its activities on local populations and territories, particularly highlighted by the recent archaeological discoveries at the project site.

During the construction phase of the Belvis Solar plant, extensive archaeological surveys were conducted, leading to the discovery of several significant archaeological sites, including Vereda de la Herrumbre, Arroperal, Necrópolis I and II, and Arroyo Paradero. These findings underscore the rich historical and cultural heritage present in the region, dating back to Roman times, as indicated by the presence of ancient roads and rural settlements along the Zaragoza/ Mérida route.

In response to these discoveries, CTGE has employed a team of archaeologists to meticulously excavate and document these sites. The company has ensured that excavation methods, such as the Harris Matrix for stratigraphic excavation, are used to preserve the integrity of the findings. This includes the careful removal of topsoil, detailed documentation, and photogrammetry to create precise records of the sites.

The excavation projects have not only protected and highlighted the historical significance of the area but have also had a tangible economic impact. The archaeological activities have created employment opportunities for local archaeologists and support staff, thereby contributing to the local economy. Moreover, the preservation of these sites adds cultural value, which can foster local pride and potentially enhance tourism.

CTGE has demonstrated a significant financial commitment to these preservation efforts. The archaeological work has entailed substantial costs, with the excavation of Vereda de la Herrumbre alone amounting to approximately €494,485.88, and the work at Arroperal costing €619,380.79. These investments reflect the company's dedication to safeguarding cultural heritage while progressing with its renewable energy initiatives.

This concerted effort aligns with the section "Impact of the Company's Activities on Local Populations and Territories" in our Sustainability Report. By integrating archaeological preservation into our project planning and execution, CTGE not only adheres to regulatory requirements but also fosters a deeper connection with the local heritage and community.

Relationships with Local Community Stakeholders and Modes of Dialogue

CTGE actively engages with local community stakeholders through various channels to foster positive relationships and ensure transparent communication. In 2023, the organization had regular meetings with the Town Hall of Cabra del Camp (Serra Voltorera wind farm, Tarragona) to discuss community needs and project impacts. The company also hosts site visits for local authorities, such as those to the Alarcos project, allowing them to inspect and verify environmental measures firsthand. Furthermore, CTGE maintains an ongoing dialogue with local administrations by submitting environmental reports and responding to information requests, demonstrating a commitment to compliance and environmental stewardship. These efforts ensure that the company remains accountable and responsive to the concerns and expectations of the local communities where it operates.



Actions of partnership or donations



CTGE continued its support for various initiatives:

Cabra del Camp Town Hall

On November 13, 2021, CTGE signed a Share Purchase Agreement (SPA) with EDP to acquire a 100% stake in the Flores onshore wind portfolio in Spain, with a total installed capacity of 181 MW. The delivery of the Flores portfolio was successfully completed on June 27, 2022. This portfolio includes 12 wind farms distributed across the autonomous communities of Andalusia in southern Spain and Catalonia in northeastern Spain.

The Serra Voltorera wind farms, part of the Flores portfolio, are located in Cabra del Camp, Tarragona Province, Catalonia. After a collaboration agreement in 2008 by EDP, in which voluntary donations were made to support social and cultural causes, CTGE decided to continue this collaboration agreement following the acquisition of this wind farm.

CTGE contributes 50,000 euros annually to the Town Hall for the construction of new social and cultural installations or the maintenance of existing facilities.

In 2023, CTGE contributed 50,000 euros to the Town Hall. The continuation of this annual donation underscores CTGE's commitment to supporting local communities and is expected to positively influence the brand image of CTG in Catalonia.

High Commission against Child Poverty in Spain

In April 2022, CTGE joined the Spanish "Zero Child Poverty Country Alliance," an initiative launched by the High Commissioner for the Fight against Child Poverty. This alliance, comprising over 200 allies, aims to combat child poverty in Spain through collaboration among public authorities, companies, foundations, and the third sector.

Within this framework, CTGE is committed to supporting the "Patios Abiertos en plan bien" program, which is part of the National Strategic Plan for the Reduction of Childhood Obesity. This program is expected to benefit approximately 500,000 children nationwide. It focuses on promoting healthy lifestyles during childhood, increasing the availability of educational and leisure activities outside of school hours, reducing health and well-being inequalities, and creating spaces that foster social cohesion.

The "Patios abiertos en plan bien" initiative is set to be launched in various cities and towns across a wide range of Spain's autonomous communities, involving public schools, town councils, and other entities.

In 2023, CTGE donated 130,504.66 euros to Fundación CSAI in support of this project. This contribution will significantly help CTGE establish and maintain a positive relationship with the Spanish government, and it holds meaningful importance in enhancing the company's corporate image and influence in the Spanish market.



Actions of partnership or donations



CTGE, through its subsidiary WindMW, has made several significant contributions:

DGzRS (German Maritime Search and Rescue Service)

DGzRS (Deutsche Gesellschaft zur Rettung Schiffbrüchiger/ German Maritime Search and Rescue Service) is responsible for maritime search and rescue operations in the German territories of the North Sea and Baltic Sea. To fulfill its mission, the DGzRS maintains approximately 60 rescue vessels and boats stationed at 55 locations from Borkum in the west to Usedom in the east, ensuring readiness for action around the clock and in all weather conditions.

The independent and autonomous activities of the sea rescuers are funded entirely through voluntary contributions, with no financial support from the government. Since its establishment in 1865, the DGzRS has rescued over 86,000 individuals from maritime distress and imminent danger.

In 2023, WindMW Service contributed €4,700 to the DGzRS. WindMW has been a consistent donor to the DGzRS for many years, providing valuable support to its routine operations. This ongoing assistance enhances the maritime search and rescue emergency capabilities in the North Sea and Baltic Sea, thereby fostering a safe environment for production and operational activities.

Bremerhaven University of Applied Sciences

Founded in 1975, Bremerhaven University of Applied Sciences currently hosts approximately 3,000 students from around 40 nations. The university offers 25 study programs, including 17 bachelor's and 8 master's degrees. Its distinctive maritime profile stems not only from its geographical location on the Weser estuary in the North Sea but also from its innovative and modern maritime-influenced academic offerings.

The university has established a support program for Chinese students, aiming to promote science education through the non-profit cultural exchange association. This program assists Chinese students who wish to study in Bremerhaven, helping them acclimate to the local environment and integrate into German university life as swiftly as possible.

In 2023, WindMW Service contributed €4,680 to Bremerhaven University of Applied Sciences. This donation has further strengthened the positive relationship with local academic and educational sectors, enhancing the corporate image of China Three Gorges Corporation and fostering a favourable public opinion environment for the company's smooth operation and development.



Actions of partnership or donations



CTGE, through its subsidiary WindMW, has made several significant contributions:

Federal Agency for Technical Relief (THW)

The Bundesanstalt Technisches Hilfswerk (THW, English: Federal Agency for Technical Relief) serves as Germany's federal civil protection organization. Operating under the Federal Ministry of the Interior, THW employs only one percent of its staff on a full-time basis.

Remarkably, 99% of THW members are volunteers. Across the nation, over 80,000 volunteers in 668 local sections dedicate their leisure time to providing professional assistance to those in need. THW's ability to adapt its structure to evolving threats, coupled with modern equipment and highly trained specialists, ensures its operational efficiency.

In 2023, WindMW Service contributed €4,680 to the THW Bremen Branch. This donation enhances the training of volunteers, enabling them to work under optimal conditions and effectively perform various civil protection tasks.

"Living with Cancer" Association

The association Leben mit Krebs ("Living with Cancer") e.V. is a non-profit organization dedicated to promoting the interests of individuals with cancer and their families. The association offers professional information, advice, and support at no cost to those affected by cancer.

These services extend to the relatives and friends of cancer patients as well. The purpose of donations to the association is to assist patients and their families in overcoming uncertainties and fears related to cancer through a variety of self-help groups, lectures, informational events, and joint activities, thereby helping them maintain their quality of life and resilience in the face of the disease.

In 2023, WindMW donated €1,880 to the "Living with Cancer" Association once again. This contribution exemplifies the humanistic care of CTGE and WindMW for disadvantaged groups and underscores their commitment to giving back to the community and society.



Actions of partnership or donations



CTGE, through its subsidiary WindMW, has made several significant contributions:

Lions Clubs International

Lions Club International is a global service organization founded in 1917 in Chicago, Illinois, by Melvin Jones. The organization is currently headquartered in Oak Brook, Illinois. As of January 2020, it comprises over 46,000 local clubs and more than 1.4 million members, including the youth wing, Leo, spanning more than 200 countries and geographic areas worldwide.

In 2023, WindMW Service donated €930 to the Bremerhaven branch of Lions Club. In recent years, WindMW's contributions have primarily supported the implementation of Advent Calendar activities at the Bremerhaven branch. The proceeds from calendar sales are donated to organizations such as the "Help for Fellow Citizens" association in Bremerhaven, aimed at improving the quality of life for low-income individuals in local communities.

This donation has further strengthened the positive corporate image and brand influence of China Three Gorges Corporation in Germany, creating a favourable social environment for the company's operations and management. CTGE and WindMW also endeavour to maximize the long-term social, ecological, and economic benefits of the project.

Tafel Food Bank

Tafel is one of the largest volunteer-based organizations in Germany. It is entirely financed by donations, receiving no public funding. Only donated food is distributed to those in need; no food is purchased. Private donations and contributions from the business community cover the rent, transport, and administrative costs of Tafel.

Despite being perfectly edible, tons of food are wasted in Germany every day. Simultaneously, millions of people in the country lack sufficient food. Tafel works to bridge this gap between excess and need. They collect high-quality food that would otherwise be discarded and distribute it for free or at a symbolic price to socially and economically disadvantaged individuals. There are currently more than 970 Tafel organizations in Germany, all of which are nonprofit. Tafel supports between 1.6 and 2 million people in need of food across the country, nearly one-third of whom are children and youth.

The Tafel model benefits all parties involved: grocers and producers fulfil their social responsibility, people in need receive essential high-quality groceries, and food waste is reduced, thereby protecting the environment and conserving valuable resources.

In 2023, WindMW donated 1870 € to Tafel Food Bank in Zossen. This donation not only makes a positive contribution to supporting the smooth operation of Tafel Food Bank, but also helps consolidate CTGE's positive and responsible corporate image in local communities.



Actions of partnership or donations



CTGE, through its subsidiary WindMW, has made several significant contributions:

Erika Müller Foundation - Bremer Engel

The Erika Müller Foundation was established in 2003 by Erika Müller († 2019) with an endowment of two million euros. Born in Bremen, she sought to utilize her personal wealth to support seriously ill children, children with cancer, and their families.

In 2005, the board of directors initiated the BREMER ENGEL project. This initiative aims to assist sick children and their families in transitioning back to everyday life after hospitalization. The young patients are cared for by specially trained and experienced pediatric nurses and therapists, who are already familiar with them from the hospital. This continuity of medical and psychosocial care at home facilitates faster recovery in the comfort of their family environment.

In 2023, WindMW donated €2,800 to the Erika Müller Foundation - Bremer Engel. This donation significantly enhances the quality of life for seriously ill children in Bremen. It exemplifies the humanistic care of China Three Gorges as a responsible enterprise supporting vulnerable groups, thereby further strengthening the brand image and influence of both CTGE and WindMW.

Carlos Animal Protection Society

Founded in 2015, the Carlos Animal Protection Society is an organization comprising a dedicated group of seven permanent volunteer team members and numerous volunteers in Germany and Spain. The society focuses on providing abandoned and abused animals with new homes and a second chance at life through donations.

In 2023, WindMW donated €1,870 to the Carlos Animal Protection Society. This contribution underscores the principle that life is paramount, and every life is precious. It exemplifies the humanitarian spirit of China Three Gorges Europe (CTGE) and WindMW, aiming to foster harmonious and friendly relations with local communities and their residents.

Actions of partnership or donations



The **Greek project of CTGE**, its first overseas photovoltaic venture, included:

School for Children with Special Needs Naousa and Care Home Naousa

The School for Children with Special Needs Naousa (KDAP-MEA NAOUSA) is an association dedicated to the creative activities of children with special needs. Established in 2002, its primary objective is to promote the social integration of children with disabilities and enhance their quality of life.

Care Home Naousa, founded in 1989, provides accommodation and protection for elderly individuals who are unable to work and require care. Donations are directed towards improving the quality of life for these elderly residents.

The Greek project initiated annual donations to these entities in 2018. In 2023, the Greek project continued its support by donating €3,000 to the School for Children with Special Needs and €3,000 to the Care Home. These contributions provided effective assistance to both institutions, reinforcing the positive brand image of CTGE. Moreover, this support strengthened the local community's sense of identity with the project and enhanced the friendly relationship between the project and the local populace.

Local Fire Brigades

In 2023, the Greek project donated €1,500 to Naousa Fire Station and an additional €1,500 to Ermioni Fire Station. These donations have further strengthened the friendly relationship between the Greek project and the local fire departments.

5.4 Consumers and End Users

CTGE as a prominent player in the renewable energy production sector, primarily engages in large-scale energy generation. Given its operational focus, CTGE does not interact directly with end consumers; instead, it supplies energy to wholesale markets, utilities, and other intermediaries.

This business model explains why CTGE does not report data specific to final users—its role is to efficiently generate and supply energy to intermediary entities that handle direct consumer sales and distribution.

Nevertheless, CTGE is committed to transparency and accountability across all aspects of its operations. Recognizing the importance of open communication, we maintain a complaint channel. This channel is a critical part of our corporate responsibility framework, ensuring that any concerns or issues, including those from indirect stakeholders impacted by our operations, are addressed promptly and effectively.



6

Governance information



6.5 Corporate Conduct

As part of CTG Corporation, CTGE is committed to upholding and transmitting the same values that drive our parent company. It encompasses the principles and values that guide our activities in every aspect, ensuring that we operate with integrity, transparency, and accountability.

By adhering to these principles, we not only comply with various regulations but also foster a culture of ethical behaviour and social responsibility. The following sections will share specific information about our corporate conduct, illustrating our commitment to upholding the highest standards in all our endeavours.

6.5.3 Corporate Culture

Our corporate culture is deeply rooted in the principles of **sustainability, social responsibility, and global cooperation**, ensuring that our operations align with the broader mission of CTG Corporation.

Our guiding philosophy, “**localization with global thinking**” is central to our approach. This means that while we operate on a global scale, we remain acutely aware of and responsive to the needs and circumstances of the local communities where we are present. We are dedicated to supporting local economic development, creating jobs, and improving the quality of life in these regions.

The **Compliance area** plays a crucial role in promoting an Ethical Culture within CTGE by fostering an organizational culture based on ethics and responsibility, aligning business behaviours and decisions with ESG values. We identify and assess compliance risks, developing strategies to mitigate them and implementing internal control measures to prevent and detect non-compliance procedures.

In this aspect, promoting ethical business practices that go beyond simple regulatory compliance is fundamental to our culture. By fostering a corporate culture that prioritizes innovation, sustainability, and community support, we ensure that our operations not only achieve efficiency and effectiveness but also contribute positively to the global community.

In line with our commitment to ethical business practices, we have developed and implemented a **Code of Ethics**. Issued and implemented in December 2023, this code serves as a comprehensive guide for all employees, outlining the ethical standards and behaviours expected within the company.

This Code serves as a fundamental framework for guiding the behavior and actions of all individuals associated with our company, reflecting the core values and ethical standards that CTG Corporation upholds globally.

The Code of Ethics emphasizes our commitment to operating with the highest standards of integrity and responsibility in all our markets. It underscores the importance of compliance with applicable laws and regulations, ensuring that no employee compromises these standards under any circumstances. Our reputation as a responsible and ethical company is one of our most valuable assets, and the Code helps safeguard this by providing clear guidelines for ethical conduct.

It applies to all employees, who are expected to adhere to these principles in all their dealings with or on behalf of the company. While management is responsible for actively promoting the Code and CTGE’s core values, employees are required to maintain the confidentiality of sensitive information and ensure the accuracy and integrity of our work.

It encourages employees to report any actual or suspected violations through established channels, including the **Legal and Compliance Department** or the **Whistleblower Channel**, guaranteeing protection for whistleblowers and ensuring that reports are addressed appropriately.

It also strictly prohibits bribery, kickbacks, and any form of corruption, mandating that all business dealings must be conducted honestly and fairly, without manipulation, misrepresentation, or unethical practices. This includes our interactions with business partners, consultants, subcontractors, suppliers, and government officials.

This holistic approach to corporate conduct helps us maintain our integrity and reinforces our commitment to being recognized globally as an ethical and responsible company.



6.1.2 Protection of Whistleblowers

Our ethical behavior is supported by robust mechanisms for monitoring and enforcement. An essential part of this mechanisms is our **whistleblower channel**.

In 2023, we established an internal whistleblowing channel and developed a detailed protocol outlining the minimum principles and guarantees provided in accordance with Spanish legislation.

This protocol ensures that employees can **report unethical or illegal activities** through various means, both verbal and written, while maintaining the confidentiality of the informant. The whistleblowing channel is designed to respect the privacy and protection of whistleblowers, ensuring that all reports are handled with the utmost discretion and integrity.

The importance of this whistleblowing channel cannot be overstated. It serves as a crucial tool for identifying and addressing potential issues within the organization, thereby maintaining our high standards of ethical conduct. Employees are encouraged to use this channel to report any bad practices they observe, knowing that their confidentiality will be safeguarded and that their concerns will be taken seriously.

To support this initiative, the **Legal & Compliance Department** actively promotes awareness and understanding of the whistleblowing protocol among all employees. Continuous training programs and policy updates are provided to ensure that everyone is informed about the procedures and protections in place. This proactive approach helps to foster a culture of openness and accountability, reinforcing our commitment to ethical business practices.

By integrating these mechanisms into our corporate culture, we ensure that CTGE upholds the highest standards of integrity and ethical conduct, reinforcing our dedication to responsible business practices.

More information about the whistleblower channel and its protocol can be found on our website [Whistleblower Channel](#).

6.5.5 Political Engagement and Lobbying Activities

Our operations are strictly focused on our core business areas, and we do not participate in **any political activities or lobbying efforts**. This approach ensures that our business practices remain neutral and independent, aligned with our commitment to ethical conduct and corporate responsibility.

Article 14 of our **Management Measures for Anti-Commercial Bribery and Corruption policy**, strictly prohibited from making any donation relating to politics, and shall not directly or indirectly make political contribution to any political party or individual in any country or region.



6.5.5 Corruption and Bribery

At CTGE, our commitment to integrity and transparency is underscored by our stringent anti-commercial bribery and corruption policies, as delineated in our management measures. The **Management Measures for Anti-Commercial Bribery and Corruption policy** aim to mitigate risks and ensure compliance with all relevant laws and regulations, thereby safeguarding our operations from legal and reputational damage.

Our framework defines commercial bribery and corruption comprehensively, prohibiting all forms of corrupt practices, including the improper provision or acceptance of gifts, entertainment, and political contributions. The policy is explicit in banning facilitation payments unless critical for safety and legally permissible, ensuring strict compliance with procedural transparency.

To enforce these standards, CTGE has instituted a robust organizational structure led by the **Chief Compliance Officer** and supported by the **Legal and Compliance Department**. These bodies are responsible for implementing compliance programs, conducting risk assessments, and managing training initiatives to foster a culture of compliance across all levels of the organization.

CTGE's anti-corruption efforts are a cornerstone of our corporate governance, reflecting our dedication to ethical business practices and our commitment to lead by example in the renewable energy sector.

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6.5.7 Contributions to Foundations and Non-Profit Entities and Partnership or Sponsorship Actions

In 2023, CTGE demonstrated its commitment to social responsibility through a series of corporate social responsibility (CSR) projects across Spain, Germany, and Greece. The total donation amounted to €212,914.66, encompassing various fields such as health, culture, education, scientific research, social assistance, and animal welfare. These initiatives not only addressed the local needs but also enhanced CTGE's corporate image and brand awareness in these regions.

Country	Project	Actual donation amount
Germany	German Maritime Search and Rescue Service	€4,700.00
	University of Applied Sciences Bremerhaven	€4,680.00
	Federal Agency for Technical Relief Bremerhaven branch	4,680.00 €
	Lions Club	930.00 €
	Tafel Food Bank	1,870.00 €
	Living with Cancer Association	1,880.00 €
	Erika Müller Foundation - Bremer Angel	2,800.00 €
	Carlos Animal Protection Society	1,870.00 €
Greece	Caring and giving back to local society programme	9,000.00 €
Spain	Project with High Commission against Child Poverty in Spain	130,504.66 €
	Cabra del Camp Town Hall Annual Donation	50,000.00 €

6.6 Fiscal Information

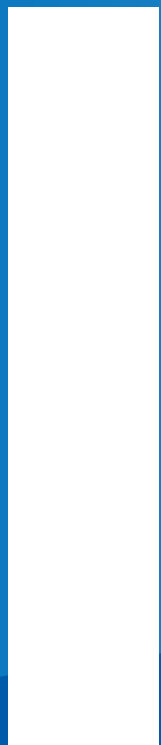
This section provides the fiscal information relating to CTGE during the fiscal years of 2023 and 2022. The data is laid out in two different tables according to the reported amount and divided by country:

Amount of profits earned (thousands of euros) by country		
Country	2023	2022
Spain	21,347.00	135,544.00
Germany	11,975.07	94,885.50
Portugal	348.33	-97.13
UK	98.71	-60.99
Greece	598.89	-657.89
Luxemburg	96,551.14	88,089.86
TOTAL	130,919.14	319,335.37

Amount of taxes on profits paid (thousands of euros) by country		
Country	2023	2022
Spain	11,144.00	39,422.00
Germany	5,088.15	25,388.95
Portugal	4.75	23.57
UK	0	0
Greece	275.58	21.47
Luxemburg	0	0
TOTAL	16,512.48	64,855.99



Photo by Antonio J. Bolaños



Annex I

Correspondence table



11/2018 Law	Contents	GRI 2021	SGD	ESRS	Page
Business model	Description of the business model, including:	2-1	8.8	ESRS 2 SBM-1: Strategy, Business Model and Value Chain	5 - 10
	1. Business environment	2-1	-	ESRS 2 SBM-2: Stakeholder interests and views	
	2. its Organisation and structure	2-1	-	ESRS 2 SBM-3: Material issues, risks and opportunities and their interaction with strategy and the business model	
	3. Markets in which it operates	2-1	-	G1-1: Corporate culture and policies on corporate culture and business conduct	
	4. Objectives and strategies.	2-6	-	ESRS 2 GOV-1: The role of governance, management and supervisory bodies	
	5. Main factors and trends that may affect its future development.	2-6	-	ESRS 2 GOV-4: Due Diligence Statement	
General	Mention in the report of the national, European or international reporting framework used for the selection of non-financial key performance indicators included in each of the sections.	-	-	ESRS 2 BP-1: General bases for the preparation of the sustainability statement	5 - 9
				ESRS 2 BP-2: Disclosures relating to specific circumstances	
				ESRS 2 IRO-2: Disclosure requirements set out in the ESRS covered by the company's sustainability statement	
Policies	A description of the organisation's policies with respect to such issues, including:	2-19	-	ESRS 2 MDR-P: Policies adopted to manage material sustainability issues	10
	1. The due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts.	-	-	ESRS 2 MDR-A: Actions and resources in relation to material sustainability issues	
	2. Verification and control procedures, including what measures have been taken.	-	-		
	The results of these policies, including relevant non-financial key performance indicators	-	-	ESRS 2 MDR-T: Monitoring the effectiveness of policies and actions through targets	
Key indicators	1. Monitoring and evaluation of progress and;	-	-		12 - 15
	2. To promote comparability across societies and sectors, in accordance with the national, European or international frameworks of reference used for each subject.	-	-	ESRS 2 MDR-M: Parameters in relation to material sustainability issues	
Risks	The main risks related to these issues associated with the organisation's activities, including, where relevant and proportionate, its business relationships, products or services that may have a negative impact on these areas, and how the organisation manages these risks, explaining the procedures used to identify and assess them in accordance with the national, European or international frameworks of reference for each area. This should include information on the impacts that have been identified, providing a breakdown of these impacts, in particular the main short, medium and long-term risks.	-	-		17 - 19
		413-1	-	General ESRS 2 GOV-5: Risk management and internal controls for sustainability disclosures	
		407-1	8.8	ESRS 2 IRO-1: Description of processes to identify and evaluate material impacts, risks and opportunities	
		408-1	8.7 and 16.2	ESRS 2 IRO-2: Disclosure requirements set out in the ESRS covered by the company's sustainability statement	
		409-1	8.7		

BM = Sector-Based Materiality
GOV = Governance
BP = Business Practices

IRO = Impacts, Risks, and Opportunities
MDR-P = Minimum Disclosure Requirements - Performance
MDR-A = Minimum Disclosure Requirements - Assurance

MDR- M = Minimum Disclosure Requirements - Metrics
MDR-T = Minimum Disclosure Requirements - Transparency

11/2018 Law	Contents	GRI 2021	SGD	ESRS	Page
Environmental issues. Environment	1. Detailed information on the current and expected effects of the company's activities on the environment and, where appropriate, health and safety, environmental assessment or certification procedures;	-	-	ESRS GOV-2: Information provided to, and sustainability issues addressed by, the company's management, governing and supervisory bodies	21-28
	2. The resources devoted to the prevention of environmental risks;	2-23	-		
	3. The application of the precautionary principle, the amount of provisions and safeguards for environmental risks.	201-2	13.1	ESRS 2 GOV-3: Integration of sustainability-related performance into incentive systems	
			13.1		
		-	16.3		
		308-1	-		
	308-2	-			
Environmental issues. Pollution	1. Measures to prevent, reduce or remediate carbon emissions that seriously affect the environment;	-	-	ESRS 2 IRO-1: Description of processes for identifying and assessing pollution-related impacts, risks and opportunities of material significance	37 - 39
	2. Taking into account any form of activity-specific air pollution, including noise and light pollution.	305-5	13.1, 14.3 and 15.2	E2-1: Pollution-related policies	
				E2-2: Pollution-related actions and resources	
				E2-3: Pollution-related targets	
				E2-4: Pollution of air, water and soil	
		305-6	3.9 and 12.4	E2-5: Substances of concern and substances of very high concern	
			E2-6: Expected financial impacts of pollution impacts, risks and opportunities		
Environmental issues. Circular economy and waste management	1. Measures for prevention, recycling, reuse, other forms of recovery and disposal of waste;	-	-	ESRS 2 IRO-1: Description of processes for identifying and assessing material impacts, risks and opportunities related to resource use and the circular economy	57 - 60
				E5-1: Policies related to resource use and the circular economy	
				E5-2: Actions and resources related to resource use and the circular economy	
				E5-3: Targets related to resource use and the circular economy	
				E5-4: Resource use and the circular economy	
				E5-5: Resource outflows	
			E5-6: Expected financial impacts of impacts, risks and opportunities related to resource use and the circular economy		

11/2018 Law	Contents	GRI 2021	SGD	ESRS	Page
Environmental issues. Sustainable use of resources	1. Water consumption and water supply in accordance with local restrictions;	-	-	ESRS 2 IRO-1: Description of processes for identifying and assessing water and marine-related impacts, risks and opportunities of relative importance E3-1: Water and marine resources policies E3-2: Actions and resources related to water and marine resources E3-3: Targets related to water and marine resources E3-4: Water consumption and use E3-4: Water consumption E3-5: Expected financial impacts of impacts, risks and opportunities related to water and marine resources	40 - 42
		303-1	6.3, 6.4, 6.A, 6.B and 12.4		
		303-2	6.3		
		303-3	6.4		
		303-5	6.4		
		303-6	6.4		
	2. Consumption of raw materials and measures taken to improve the efficiency of their use;	301-1	8.4 and 12.2	E5-4: Resource inputs	57
		302-2	7.2, 7.3, 8.4, 12.2 and 13.1		
		302-3	7.3, 8.4, 12.2 and 13.1		
	3. Direct and indirect energy consumption, measures taken to improve energy efficiency and the use of renewable energies.	302-1	7.2, 7.3, 8.4, 12.2, 13.1	E1-5: Energy consumption and energy mix	34 - 36
		302-2	7.2, 7.3, 8.4, 12.2 and 13.1		
		302-3	7.3, 8.4, 12.2 and 13.1		
		302-4	7.3, 8.4, 12.2 and 13.1		
		302-5	7.3, 8.4, 12.2 and 13.1		

11/2018 Law	Contents	GRI 2021	SGD	ESRS	Page
Environmental issues. Climate change	1. Significant elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces;	305-1	3.9, 12.4, 13.1, 14.3 and 15.2	E1-6: GHG emissions from Scope 1, 2 and 3 and total GHG emissions	29 - 33
		305-2	3.9, 12.4, 13.1, 14.3 and 15.2		
		305-4	13.1, 14.3 and 15.2		
		305-5	13.1, 14.3 and 15.2		
	2. Measures taken to adapt to the consequences of climate change;	-	13	ESRS 2 IRO-1: Description of processes to identify and assess material climate-related impacts, risks and opportunities	
				E1-1: Transition plan for climate change mitigation E1-2: Policies related to climate change mitigation and adaptation E1-3: Actions and resources related to climate change policies E1-7: GHG removals and GHG mitigation projects financed through carbon credits E1-8: Internal carbon pricing system E1-9: Potential financial effects from material physical and transition risks and potential climate-related opportunities	
	3. Voluntary reduction targets set for the medium and long term to reduce greenhouse gas emissions and the means implemented to this end.	305-5	13.1, 14.3 and 15.2	E1-4: Targets related to climate change mitigation and adaptation	
Environmental issues. Biodiversity	1. Measures taken to preserve or restore biodiversity;	-	-	E4-1: Transition plan on biodiversity and ecosystems ESRS 2 IRO-1: Description of processes for identifying and assessing material impacts, risks and opportunities related to biodiversity and ecosystems E4-2: Biodiversity and ecosystem policies E4-3: Biodiversity and ecosystem-related actions and resources E4-4: Biodiversity- and ecosystem-related targets E4-6: Potential financial effects from biodiversity and ecosystem-related impacts, risks and opportunities	43 - 56
	2. Impacts caused by activities or operations in protected areas.	304-2	6.6, 14.2, 15.1 and 15.5	E4-5: Impact metrics related to biodiversity and ecosystems change	

11/2018 Law	Contents	GRI 2021	SGD	ESRS	Page
Social issues. Employment	1. Total number and distribution of employees by gender, age, country and occupational classification;	2-7	8.5 and 10.3	S1-6 - Characteristics of the enterprise's employees S1-7 - Characteristics of non-salaried employees in the enterprise's own workforce S1-10 - Adequate salaries	62 - 64
		401-1	5.1, 8.5, 8.6 and 10.3		
		405-1	5.1, 5.5 and 8.5		
	2. Total number and distribution of types of employment contracts,	2-7	8.5 and 10.3		
	3. Average annual number of permanent contracts, temporary contracts and part-time contracts by gender, age and occupational classification,	2-7	8.5 and 10.3		
		405-1	5.1, 5.5 and 8.5		
	4. Number of dismissals by sex, age and occupational classification;	401-1	5.1, 8.5, 8.6 and 10.3		
	5. Average remunerations and their evolution disaggregated by sex, age and professional classification or equal value;	405-2	5.1, 8.5 and 10.3		
	6. The average remuneration of directors and executives, including variable remuneration, allowances, indemnities, payments to long-term savings schemes and any other payments broken down by gender;	2-19	-	S1-6 - Characteristics of employees in the enterprise	65
		2-20	-		
		2-21	-		
		2-21	-		
		201-3	-		
		202-1	1.2, 5.1 and 8.5		
		405-2	5.1, 8.5 and 10.3		
	7. Implementation of policies of disconnection from work	-	-	S1-1 - Policies relating to own staff	
	8. Employees with disabilities	405-1	5.1, 5.5 and 8.5	S1-12 - People with disabilities	66

11/2018 Law	Contents	GRI 2021	SGD	ESRS	Page
Social issues. Work organisation	1. Organisation of working time;	-	-	S1-15 - Work-life balance parameters	68 and 69
	2. Number of hours of absenteeism;	403-2	8.8		
	3. Measures aimed at facilitating the enjoyment of work-life balance and encouraging the co-responsible exercise of work-life balance by both parents.	-	-		
Social issues. Health and safety	1. Health and safety conditions at work;	-	-	S1-11 - Social protection S1-14 - Health and safety parameters	70 - 72
	2. Accidents at work, in particular their frequency and seriousness;	403-2	8.8		
	3. Occupational diseases; disaggregated by sex.	403-3	8.8		
Social issues. Social relations	1. Organisation of social dialogue, including procedures for informing, consulting and negotiating with staff;	-	-	S1-2 - Processes for engaging with own workers and workers' representatives on incidents	73 and 74
	2. Percentage of employees covered by collective bargaining agreements by country;	2-30	8.8	S1-3 - Processes for remediation of negative incidents and channels for own employees to voice their concerns	
	3. The balance of collective agreements, particularly in the field of occupational health and safety at work.	403-1	8.8	S1-5 - Targets related to material adverse incident management, positive incident momentum and material risk and opportunity management	
		403-4	8.8 and 16.7	S1-8 - Coverage of collective bargaining and social dialogue	
Social issues. Formation	1. Policies implemented in the field of training;	-	-	S1-13 - Parameters for training and competence development	75 and 76
	2. The total number of training hours per professional category.	404-1	4.3, 4.4, 4.5, 5.1, 8.2, 8.5 and 10.3		
Social issues. Accessibility	1. Universal accessibility for people with disabilities	-	-	S1-4 - Action taken on material incidents related to own staff, approaches to mitigate material risks and take advantage of material opportunities related to own staff and effectiveness of such actions	77
Social issues. Equality	1. Measures taken to promote equal treatment and equal opportunities for women and men;	-	-	S1-4 - Action taken on material impacts on own staff, approaches to mitigate material risks and take advantage of material opportunities related to own staff and effectiveness of such action S1-9 - Diversity metrics	77
	2. Equality plans (Chapter III of Organic Law 3/2007, of 22 March, for the effective equality of women and men), measures adopted to promote employment, protocols against sexual and gender-based harassment, integration and universal accessibility for people with disabilities;	-	-		
	3. The policy against all types of discrimination and, where appropriate, diversity management.	-	-		

11/2018 Law	Contents	GRI 2021	SGD	ESRS	Page
Human rights	1. Implementation of human rights due diligence procedures;	-	-	S1-17 - Serious human rights-related incidents, complaints and serious occurrences	89
	2. Prevention of risks of human rights abuses and, where appropriate, measures to mitigate, manage and redress potential abuses;	-	-		
	3. Promotion and enforcement of the provisions of the International Labour Organisation's core conventions related to respect for freedom of association and the right to collective bargaining;	-	-		
	4. Elimination of discrimination in employment and occupation;	-	-		
Corruption and bribery		-	-		
	1. Measures taken to prevent corruption and bribery;	201-1	8.1, 8.2, 9.1, 9.4 and 9.5	G1-3: Prevención y detección de la corrupción y el soborno	91
		205-2	16.5	G1-4: Casos confirmados de corrupción o soborno	
		205-3	16.5	G1-5: Influencia política y actividades de los grupos de presión	
	2. Measures to combat money laundering,	205-2	16.5	G1-6: Prácticas de pago	
		413-1	-		
		415-1	16.5		
Society. Commitment to sustainable development	1. The impact of society's activity on employment and local development;	-	-		12 and 92
		413-1	-	S3-1: Policies related to affected groups	
	2. The impact of the company's activity on local populations and on the territory;	413-1	-	S3-2: Processes for engaging with affected constituencies on grievances	
				S3-3: Processes for remediation of negative impacts and channels for affected groups to voice concerns	
				S3-4: Actions taken on material impacts, approaches to mitigate material risks and exploit material opportunities related to affected constituencies, and effectiveness of such actions and approaches	
	3. The relations maintained with the actors of the local communities and the modalities of the dialogue with them;	2-29	-		
		413-1	-	S3-5: Targets related to managing material negative impacts, driving positive impacts and managing material risks and opportunities	
	4. Partnership or sponsorship actions.	-	-		
		2-28	-		

11/2018 Law	Contents	GRI 2021	SGD	ESRS	Page
Society. Subcontracting and suppliers	1. Inclusion of social, gender equality and environmental issues in the procurement policy;	2-6	-	G1-2: Management of supplier relations	78
		-	-	S2-1: Policies related to value chain workers S2-2: Processes for collaborating with value chain workers on incidents	
	2. Consideration in relations with suppliers and subcontractors of their social and environmental responsibility;	-	-	S2-2: Processes for collaborating with value chain workers on incidents	
		204-1	8.3	S2-3: Processes for remediation of negative incidents and channels for value chain workers to voice their concerns	
		-	-	S2-4: Actions taken on material incidents related to value chain workers, approaches to managing material risks and exploiting material opportunities related to value chain workers and the effectiveness of such actions	
	3. Monitoring and auditing systems and audit results.	-	-	S2-5: Targets related to managing material adverse events, driving positive events, and managing material risks and opportunities.	
Society. Consumers	1. Measures for the health and safety of consumers;	-	-	S4-1: Consumer and end-user policies	87
				S4-2: Processes for engaging with consumers and end-users about incidents	
	2. Complaint systems, complaints received and their resolution.	-	-	S4-3: Processes for redressing negative incidents and channels for consumers and end-users to voice their concerns	
				S4-4: Actions taken in relation to material impacts on consumers and end-users, approaches to mitigate material risks and exploit material opportunities related to consumers and end-users and the effectiveness of such actions	
				S4-5: Targets related to managing material adverse impacts, driving positive impacts and managing material risks and opportunities	
Society. Tax information	1. The benefits obtained on a country-by-country basis;	201-1	8.1, 8.2, 9.1, 9.4 y 9.5		93
	2. Taxes on profits paid;	-	-		
	3. Public subsidies received.	201-4	-		

