



## **TO BME GROWTH**

**Barcelona, 26 April 2023**

In accordance with the provisions of article 17 of Regulation (EU) no. 596/2014 on market abuse and article 227 of the consolidated text of the Law on Market Securities and Investment Services, approved by Royal Legislative Decree 6/2023, of 17 March, and related provisions, as well as Circular 3/2020 of the BME Growth segment of BME MTF Equity, Holaluz-Clidom, S.A. ("Holaluz" or the "Company") hereby informs you of the following information:

### **OTHER RELEVANT INFORMATION**

Attached to this document is the integrated report corresponding to the period ending 31 December 2022.

In compliance with the provisions of BME MTF Equity Circular 3/2020, it is hereby expressly stated that the information provided has been prepared under the sole responsibility of the Company and its directors.

**Carlota Pi Amorós**

Chief Executive Officer

HOLALUZ-CLIDOM, S.A



holaluz

# Integrated Report 2022

Building the most impactful green energy community in Europe by unleashing the full potential of electrifying energy demand by scaling distributed Solar and Storage.





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# Letter from the CEO

**“Any Revolution is just the impossible waiting to be challenged.”**

That’s why we’re showing day after day that The Rooftop Revolution is possible, fueled by a **driving ambition for a green planet and based on real actions.**

**Fixing the climate crisis by decarbonizing the economy is easy.**  
Very easy, in fact.

It will get done by democratising solar, transforming every single one of the 10M available residential rooftops in Spain into green and cheap electricity for everybody while electrifying energy demand. 10M rooftops account for over 50GW of new distributed and 100% green generation capacity. A massive number compared to the current 120GW of total-non green and green-capacity installed.

In 2022 we have taken a giant leap towards **our goal of achieving a 100% green planet.**

It has been a year of deep transformation going from a green tech software development company that mainly did energy management for retail customers to a **fully integrated energy transition company** that is disrupting the way energy is produced, consumed and managed in the country of the sun.

Despite the challenging context of 2022 marked by unprecedented electricity prices and the war in Ukraine, we **have consolidated our leading position as an energy transition company** in Europe by **transforming more than 11,000 rooftops into 100% green energy producers, not only for themselves but also for their communities around them.**

On top of this, our home energy systems are also equipped with flexible assets that allow our customers to increase their monthly savings up to 100%. So far, we have installed more than **1,000 smart electric vehicles chargers** and we have a clear path for the deployment of home batteries in the near future.



And it’s all thanks to our passionate, high-performance team of **752 revolutionaries.** Each and every one of them 100% committed to a planet powered by green energy. In addition, our focus on ending gender bias in the workplace has led us to create the world’s first school for female solar installers, and to commit to equity in technology roles.

Our ESG DNA and impact business model deliver strong financial results while proving that it is possible to build an energy transition company with real impact on people and on climate change. We have managed to avoid **the emission of more than 2.3 million of tons of CO<sub>2</sub>** since our foundation and we are committed to the climate targets set by the UNFCCC (United Nations Framework Convention on Climate Change) to keep our planet’s temperature increase to 1.5°C below pre-industrial levels.

Furthermore, **Sustainalytics** has again rated Holaluz as the **no.1 ESG Risk Rating energy producer company within independent power production and traders subindustry worldwide** and we have adhered to the **United Nations Global Compact**, aligning our activity with the Ten Principles and maximising our contribution to the Sustainable Development Goals (SDGs).

And all of this is thanks to you. Every investor, every team member and each and every one of our customers.

Fixing the climate crisis by decarbonizing the economy is within our reach. We just have to keep rowing, rooftop by rooftop, day after day.

Thank you for being part of The Rooftop Revolution.

**Carlota Pi Amorós, CEO and cofounder Holaluz.**

## About this report

This is the first **Integrated Report** published by **Holaluz-Clidom S.A.** (hereinafter "Holaluz," "the company" or "the organisation"), corresponding to the year ended 31 December 2022. Its objective is to report on environmental, social, economic, personnel, human rights-related topics as well as the impact on society resulting from the development of the company's activity.

This **Integrated Report** is available on the [corporate website](#), forms part of the management report and constitutes the Non-Financial Information Statement. The 2022 **Consolidated Financial Statements** presented in this report follow the Spanish General Accounting Plan and include all the subsidiaries of the parent company, Holaluz-Clidom, S.A.<sup>1</sup>.

The report has been prepared in accordance with the **Integrated Reporting <IR>** framework of the International Financial Reporting Standards Foundation (IFRS) and conveys how the strategy, governance, performance and perspectives of

Holaluz impact the creation of value in the short, medium and long term. In addition, the report has been prepared in accordance with the **GRI Universal Standards** and follows the European Commission's guidelines on non-financial reporting (2017/C 215/01) derived from **Directive 2014/95/EU**; the requirements of **Law 11/2018 of 28 December 2018 on Non-Financial Information and Diversity**<sup>2</sup>; and the European Taxonomy. In accordance with legal requirements, the information presented regarding Law 11/2018 and European Taxonomy, has been verified by an independent verification body. The verification report is included in Annex IV.

Any questions or queries regarding its contents should be addressed to [investors@holaluz.com](mailto:investors@holaluz.com).

<sup>1</sup> Subsidiaries of Holaluz-Clidom, S.A: Clidomer Unipessoal, LDA; Clidom Italia, SRL; Clidom France, SARL; Holaluz Generación, SL; Clidom Solar, SL; Clidom Generación, SL; Holaluz Rooftop Revolution, SL; Katae Energía, SL; Gestion Hidraulica Canarias, SL; and Clidom Energía Ibérica.

<sup>2</sup> It includes information on Holaluz-Clidom, S.A. and all its subsidiaries.







01

**Holaluz: an energy  
transition company**



# About Holaluz

**Holaluz is an energy transition company** that was born with the conviction of being a tool for global change and the purpose of **achieving a world powered 100% by green energy**.

The current climate emergency requires urgent and sustainable long-term solutions. **Holaluz proposes a structural change:** transforming the current energy generation model - centralised and non-renewable - **towards a new model based on distributed and 100% green generation**.

**From a unique combination of two businesses - the installation of solar systems and energy management** - and with the vision of creating the largest green energy community in Europe, Holaluz builds a green ecosystem in homes by transforming m<sup>2</sup> of rooftops into 100% renewable electricity producers and optimising the efficiency of its installations through flexible assets such as electric vehicle chargers and batteries. A sustainable and cheaper way for everyone to meet the growing electrification of demand.

The generation model proposed by **Holaluz maximises the potential of each rooftop** allowing, through the development of proprietary technology and the use of data, to distribute to other users the energy generated beyond the self-consumption of the owner of the solar panels. In this way, **the access to green and local energy is democratised**.

Holaluz's purpose is centred on the planet and people. The people in the team can develop holistically, with flexibility, autonomy and parity at all levels of decision-making. All this, together **with a business model of genuine impact and an ESG DNA** have placed Holaluz as **the first European electricity company to receive the B Corp certification**, a seal that gives visibility to companies that innovate to maximise their positive impact on employees, on the communities they serve and on the environment. It is also a founding member of the Conscious Capitalism movement in Spain, a philosophy that recognises the innate potential of business to have a positive impact on the world.

In January 2023 Sustainalytics placed Holaluz at **number 1 in Sustainalytics' global ESG risk ranking** in Independent Power Production and Trader Trader subindustry.

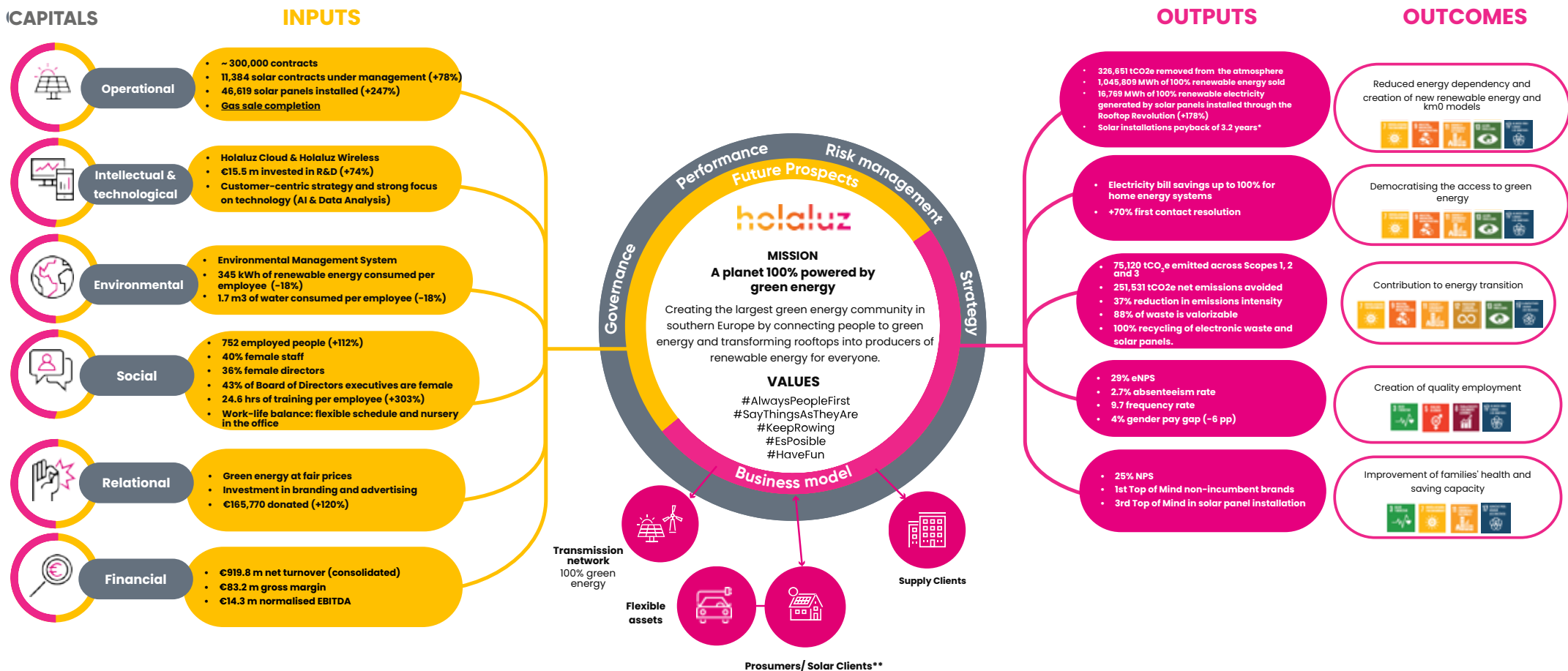
**Holaluz is already leading the energy transition in Spain** as a top player in the solar segment. Since 2010, the company has managed to **avoid 2.3 m t - CO<sub>2</sub> and more than 11,000 installations** have joined this change of model. A growing energy and social transformation movement known as "*The Rooftop Revolution*".

The company operates in Spain and holds operating licences in different countries like Portugal. Most of the renewable electricity producers are in Spain.



## VALUE CREATION MODEL

Holaluz has earned its leading position with its **transcendental purpose and disruptive values**. It manages its capital resources (financial, environmental, intellectual, social and relational) with a **positive impact business model, an ESG DNA and a people-centric transformative strategy** (customers and society). This approach enables it to address critical social and environmental challenges facing our planet such as **decarbonisation, improving people's health, reducing energy dependency, and creating quality jobs**.





# Key KPIs and milestones of the year

## BUSINESS KPIS



|  | 2022                     | 2021      |
|--|--------------------------|-----------|
| Number of contracts                        | ~ 300,000*               | ~350,000  |
| Solar contracts under management           | 11,384                   | 6,410     |
| Commercialised renewable electricity (MWh) | 1,045,809                | 1,100,027 |
| Commercialised gas (MWh)                   | 209,183                  | 257,824   |
| Normalised EBITDA (M€)                     | 14.3                     | -2.1      |
| Gross Margin (M€)                          | 83.2                     | 31.4      |
| Taxonomic revenue (%)                      | 3.3 (50.2) <sup>3</sup>  | NA        |
| Taxonomic CAPEX (%)                        | 41.7 (70.6) <sup>4</sup> | NA        |
| Taxonomic OPEX (%)                         | 50.7 (75.1) <sup>5</sup> | NA        |

<sup>3</sup> A total of 3.3% of revenue was generated by eligible business activities aligned with the EU taxonomy. Including commercialisation of 100% green electricity, the proportion is 50.2% and including representation and management of the sales of renewable electricity producers the proportion is 95,9% of operating revenue.

<sup>4</sup> A total of 41.7% of capital expense (CapEx) was generated by eligible business activities aligned with the EU taxonomy. Including commercialisation of 100% green electricity, the proportion is 70.6% of the CapEx.

<sup>5</sup> A total of 50.7% of operating expenses (OpEx) was generated by eligible business activities aligned with the EU taxonomy. Including commercialisation of 100% green electricity, the proportion is 75.1% of the OpEx.

\*The main reason for the reduction in the customer portfolio is the decommission of the gas commercialization business, strenghtening Holaluz commitment with sustainability.



## ESG KPIS


**Environment  
(E)**

|  | 2022    | 2021    |
|--|---------|---------|
| Avoided emissions (t CO <sub>2</sub> e)  | 326,651 | 349,711 |
| Solar modules installed (no.)  | 46,619  | 13,432  |
| Pay-back CO <sub>2</sub> emissions from solar installations (years) <sup>6</sup> | 3.2     | -       |
| Carbon footprint (t CO <sub>2</sub> eq) market based                             | 75,120  | 71,948  |
| Electricity consumption in Holaluz facilities (kWh)                              | 259,651 | 148,628 |
| Water consumption (m <sup>3</sup> )  | 1,250   | 720     |
| Waste generated (tn)   | 38.7    | 5.7     |
| Recoverable waste (%)  | 88      | 36      |


**Social  
(S)**

|   | 2022  | 2021 |
|---|-------|------|
| Team (no. people)                         | 752   | 354  |
| Women on the Board of Directors (%)       | 43    | 43   |
| Female managers (%)                       | 36.1  | 45.0 |
| Women in the team (%)                     | 39.6* | 45.2 |
| eNPS (%)                                  | 29    | 39   |
| Pay gap (%)                               | 4     | 10   |
| Accident frequency rate                   | 9.7   | -    |
| Severity rate                             | 0.17  | -    |
| Training (hours/employee)                 | 24.6  | 6.1  |
| First contact resolution (%) <sup>7</sup> | >70   | >70  |
| Average client NPS (%)                    | 25    | 44   |
| Tarifa justa NPS (%)                      | 46    | 56   |


**Governance  
(G)**

|   | 2022    | 2021              |
|---|---------|-------------------|
| Independent members of the Board of Directors (%) | 29      | 29                |
| Attendance at the Board of Directors (%)          | 100     | 100               |
| Communications received alert channel (no.)       | 28      | -                 |
| B Corp Certification (score)                      | 103.3   | 97.1 <sup>8</sup> |
| ESG Risk score by Sustainalytics (score)          | 11.6    | 12 <sup>9</sup>   |
| Donations to non-profit organisations (€)         | 165,770 | 75,220            |
| Digitalisation R&D (M€)                           | 15.5    | 8.9               |
| Spending on local suppliers (%)                   | 95      | 98                |

\* including installers and solar experts

<sup>6</sup> Time in which the green energy generated by the solar installation has avoided the same amount of emissions that have been generated in the production of its materials as well as its assembly.

<sup>7</sup> Resolution of the incident by the Customer Care team at the first contact or call.

<sup>8</sup> B Corp impact assessment score, 2018 evaluation. A higher score indicates a greater impact on society and the planet.

<sup>9</sup> ESG Risk score by Sustainalytics, 2020 evaluation. A lower score implies that the company has lower risk.

## KEY MILESTONES 2022



The **Energy Management business** has shown **unprecedented good results** improving revenues by 57% and EBIT by +191% compared to FY21. This has allowed the company **to bootstrap the Solar Business for FY22**.



Holaluz has implemented a solid strategy of creating holistic home energy systems **combining solar installations with flexible assets** that allow customers to increase their monthly savings to more than 100%. So far, the company has installed **more than 1,000 EV chargers** and has a clear path for the deployment of home batteries in the near future. Furthermore, Holaluz is a key actor in the V2Market European innovation project that aims to incorporate the capacity of electric vehicle batteries as an element of flexibility in the electrical system.



The company's **unique value proposition and top notch operational excellence** resulted in **strong growth in all the numbers of the solar business: 3,400 new solar systems** have been installed in 2022 multiplying by 3 compared to the previous year and solar **revenues have been multiplied by more than 6**, reaching 31 million euros.



**Holaluz is extremely proud that its ESG DNA and impact business model** delivers strong financial results while proving that it is possible to build an energy transition company with real impact on people and on climate change. Sustainability has again rated Holaluz as the **no.1 ESG energy producer company worldwide** and the company is committed to the climate targets set by the United Nations to keep the **planet's temperature** increase to 1.5°C.



The vertical integration in Solar has enabled to significantly increase the number of installations carried out by in-house teams. As a result, **the company's installation lead time is the lowest in the sector, at approximately 45 days**, and the Customer Satisfaction in Solar has increased to 8.3/10.



**The Holaluz Academy** has proven to be a key asset to upskill both our salesforce and installer team. Its creation has helped the company overcome a critical problem in the sector which is the lack of Solar talent; and has helped to enhance the company's value proposition to customers while leveraging operational excellence to achieve better financial results. Holaluz's focus on women has allowed to create **the world's first school for female solar installers**.



The energy transition company **has decommissioned gas commercialisation**, for the benefit of customers and as an effective weapon in the face of the unpostponable climate emergency. Thanks to this decision, Holaluz clients saved **more than 10 million euros in the first quarter of 2023** alone. Ending the commercialisation of gas focuses the company definitively and uniquely on The Rooftop Revolution, Holaluz's commitment to make the world run by 100% green energy.



Holaluz launched the **first Cloud-based dispatching centre** together with Amazon Web Services (AWS) and Green Eagle Solutions. The new **Holaluz energy management tech platform** aims to help the System Operator (Electricity Grid) to balance generation and demand at all times, enable greater and better integration of renewable facilities and ensure the quality of energy supply. It also allows for better resource management, improved response quality and greater scalability.



# Purpose, vision and values

## PURPOSE

**Holaluz's purpose is to achieve a 100% green planet.**

## VISION

**The company's vision is to build the most impactful green energy community in Europe by unleashing the full potential of electrifying energy demand by scaling distributed Solar and Storage.**

## VALUES

**Holaluz was created with the conviction that a company can be a tool to change the world, and this is reflected in its value proposition.**

## #AlwaysPeopleFirst

Holaluz works in an integrating and human way, prioritising integral development of its team, focusing on its customers and building good relationships based on transparency, honesty, and simplicity to inspire confidence for growth and sustainability.

## #KeepRowing

Holaluz believes in responsible, self-sufficient teams, capable of organising themselves to achieve shared, mutually agreed objectives to transform the sector. That's why the company works by projects and objectives.

## #EsPosible

Holaluz was created to change the energy model and achieve a planet run entirely by renewable energy.

## #HaveFun

Changing the energy model should be fun, which is why Holaluz wants to strike the right balance between hard work and fun to achieve its objectives.

## #SayThingsAsTheyAre

at Holaluz, nobody is afraid to speak their mind. The company encourages employees to be honest and capable of speaking up if they do not like something.

# Value proposition

Customer value proposition **includes +70% guaranteed savings** and an end-to-end customer relationship where **we install in 45 days** and manage electricity with a #1 ESG 100% renewable energy subscription-based product.



## Savings

We provide the **maximum savings (70%+)** to our customer through rooftop **maximization and energy management of flexible assets**.



## Subscription-based

We **guarantee the savings delivered** to our clients after solar installation through a **monthly fixed subscription-based invoice** (Tarifa Justa), leveraging our heavy use on technology and data to deliver the maximum savings.



## End to end customer relationship

We manage the **end-to-end installation process, delivering our solar systems in less than 45 days** for 90% of the customers. Energy management is constantly monitored thanks our technological platform and our maintenance product ensures maximization of customer lifetime value.

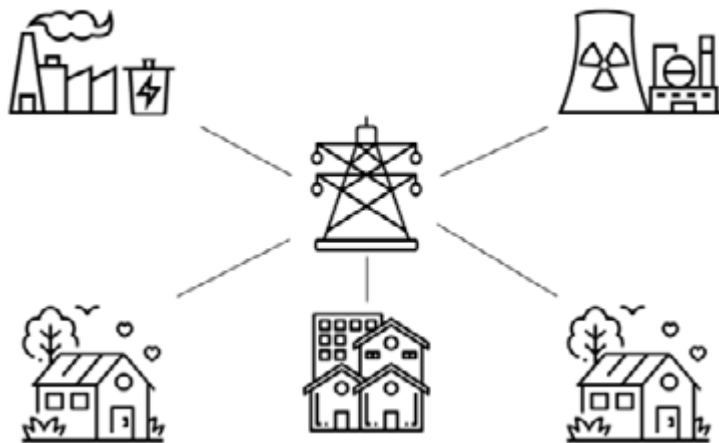


## Sustainability

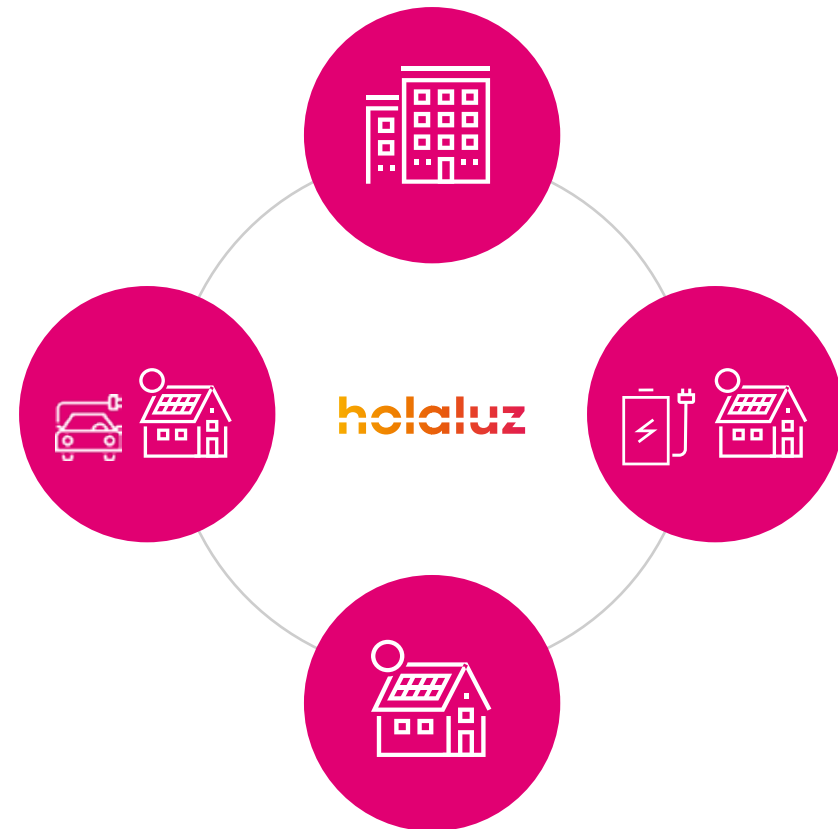
We guarantee **all our electricity is sourced from 100% renewable origin**, both from neighbouring decentralized customers and centralized PPA plants. We are the #1 ESG player worldwide in our category.

# Impact business model

**FROM** ●..... Centralised oligopoly, expensive and polluting, with limited consumer engagement in energy



**TO** ●..... Decentralised, decarbonised, democratised, affordable clean energy





Holaluz's **impact business model** allows the company to **face the global challenges of climate change** and energy transition, while having a positive impact on people and the planet by decarbonizing the economy. This is intrinsic to Holaluz's ESG strategy, part of its DNA, to promote a fair, inclusive, and regenerative economy for the planet and people focused on a totally sustainable world.

Holaluz was founded in 2010 as a green tech software development company that mainly did energy management for retail customers by buying energy from independent and centralised producers certified by the CNMC through power purchase agreements (PPA). **In June 2020**, Holaluz decided to drive its social, environmental, and economic value by launching The Rooftop Revolution: Holaluz's permanent commitment to creating a world powered entirely by green energy, transforming every m<sup>2</sup> of rooftop into a producer of affordable green energy for everyone. A movement that seeks to transform the current model of electricity generation - centralised and non-renewable - to a model that combines centralised and distributed generation and that relies entirely on renewable energy.

Based on a unique **combination of two businesses - connecting people to green energy and transforming every m<sup>2</sup> of rooftop into green energy production** - and with the vision of creating the largest green energy community in Europe, Holaluz is creating a flywheel that connects solar contracts under management with nearby communities that take up the green surplus from their solar installations. All of this increases the company's positive impact while democratising access to clean, zero-kilometre energy.

In addition, Holaluz's solar systems are also equipped with flexible assets that enable customers to increase their monthly savings by up to 100%. To date, the company has installed more than 1,000 electric vehicle chargers and has developed a solid plan for the deployment of home batteries in the near future.

The generation model proposed by Holaluz **maximises the potential of each rooftop**, allowing, through the development of its own technology and the use of data, the energy generated to be distributed to other users beyond the self-consumption of energy by the owner of the solar panels. A sustainable, cheaper way for everyone to meet the growing electrification of demand.

Furthermore, Holaluz Virtual Power Plant (VPPs) is allowing the company to retire fossil fuel plants and build the future electricity network:

- **Electricity is produced and consumed at homes with solar panels and batteries** (home and car), ensuring electricity savings on both the market price and the fixed costs for the system (T&D, etc.)
- **Excess electricity is sent back to the proximity grid**, so other customers with no available rooftops can benefit from green, cheap and km. 0 distributed electricity without T&D costs in the proximity network
- **Flexible assets like batteries and EV chargers** allow the clients to use green and km 0 electricity all day long with minimal system fixed costs

In short, a holistic vision of energy management that **consolidates the company's position as a key player in the solar segment**.



## CONTRIBUTION TO THE SUSTAINABLE DEVELOPMENT GOALS (SDGs)

The SDGs are a collection of **17 global objectives** adopted by the United Nations in 2015 to achieve a fairer, more sustainable world for everyone. The SDGs cover challenges such as eradicating poverty, guaranteeing quality education, achieving gender equity, protecting the environment and promoting economic growth. **They are a universal call to action to transform the world.** Holaluz's business model is designed to make a **major impact on the achievement of 17 SDGs**, nine of which are particularly relevant.



### **SDG7** **Affordable and clean energy**

With a mission to connect people to green energy and turn rooftops into sources of 100% green energy.



### **SDG5** **Gender equity**

We believe in empowering women, and we work to ensure the gender balance in all our teams.



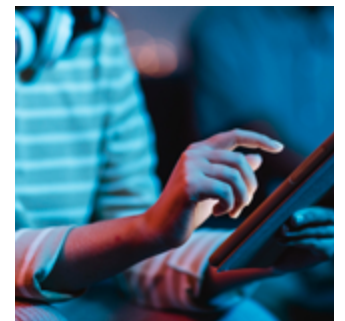
### **SDG13** **Climate action**

Holaluz was the first company to sell 100% green energy from renewable sources and is now one of the leading companies in the Spanish solar sector.



### **SDG9** **Industry, innovation, and infrastructure**

Our revolutionary business model is based primarily on the invisible technology concept. Although customers don't see the work, they benefit from personalised tariffs based on their consumption habits and energy production.





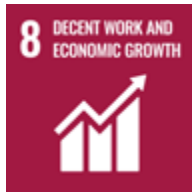
### **SDG11** **Sustainable cities and communities**

We are developing a distributed energy production model by selling green energy and with the Rooftop Revolution.



### **SDG12** **Responsible consumption and production**

We encourage responsible energy consumption and seek to increase production through alliances with independent green energy producers and solar contracts under management.



### **SDG8** **Decent work and economic growth**

Providing quality jobs that ensure our team's well-being and the strategic plan have a direct impact on economic growth.



### **SDG3** **Good health and well-being**

Contributing to the health and well-being of our company's workforce, customers, and suppliers thanks to the culture, working method, products and services.



### **SDG17** **Partnerships for the goals**

We are working with public institutions, associations, and other organisations to create a planet powered by 100% green energy while fostering community development.



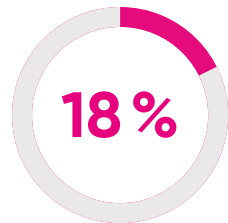


# Holaluz's essence: brand, data, and technology

## THE HOLALUZ BRAND AS A KEY ASSET



Brand awareness



Spontaneous brand awareness

NPS

25%

NPS Tarifa Justa

46%



### BRAND STRENGTH

- 1<sup>st</sup>** Top of Mind non-incumbent brands
- 3<sup>rd</sup>** Top of Mind in solar panel installations in the whole industry



### SOCIAL NETWORKS

- 1<sup>st</sup>** Position in brand positivity in social networks
- 1<sup>st</sup>** In brand conversations about solar panels

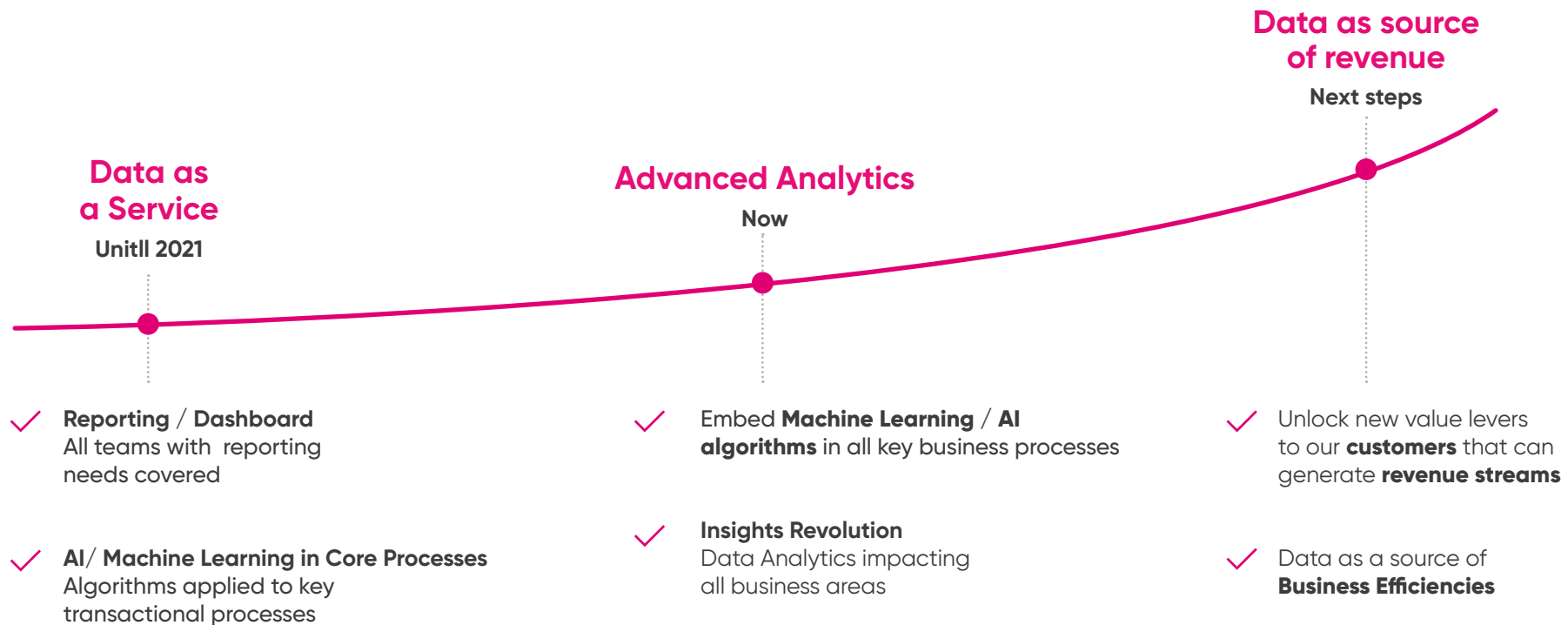
## DATA AND TECHNOLOGY



**The company's vision on data is to leverage data and artificial intelligence to gain insights, create value for new and existing customers, generate additional revenue, and maximise its business efficiency.**

In essence, data is used as a competitive advantage.

In the last year, the company has successfully moved from using data to being an advanced analytics-driven company.



## Creation of a route optimisation algorithm, increasing daily visits by 30%

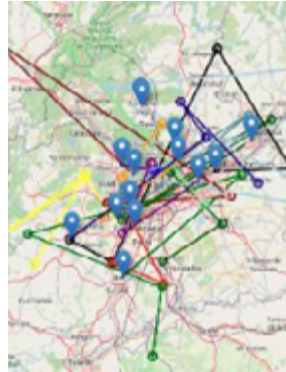
Thanks to the implementation of advanced analytics, the company has been able to optimise its sales strategies and resources.

Examples of this are the creation of a route optimisation algorithm for solar sales force as well as the intensive use of data in order to hyper-segment the market by geographic zones.

### FROM...

#### No route optimization for commercial sales force

- Every commercial agent travelling 68 kms per visit on average
- Daily salesforce commuting with no optimization



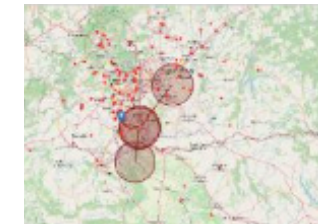
### TO...

#### Route optimization algorithm for commercial sales force

- ~45% commuting reduction, travelling
- 38 kms per visit on average



Mapping of all potential visits in real time



Matching potential visits with agent coverage radius

## Heavy usage of data to create interest : hyper segmentation

Targeting per geography: Clustering the market

- 01 All municipalities are grouped into clusters.**
- 02 Clusters are defined using a number of variables** (e.g. market growth, Holaluz market share, local subsidies, etc).
- 03 For each cluster we apply different go to market strategies in terms of channel mix** (e.g. partnerships, coldknocking, etc).

Balance each channel focus across regions/towns based on the clusters with continuous redefinition.



Since we monitor all variables on an-going basis, classification is constantly updated to reflect changes in market dynamics.



## 01. Holaluz: an energy transition company | Holaluz's essence: brand, data, and technology

On the technology side, Holaluz's vision is to offer unique products and experiences. The goal is to provide an energy service experience through technology.

During 2022, Holaluz has developed several technological projects with global impact on the company and the sector:

**Holaluz Wireless:** is a unique and value-added technological proposal that makes it possible to monetise a photovoltaic installation of a second home, or increase the savings generated by an installation in a main home from solar surpluses allowing, thus, to reduce the electricity bill between homes of the same owner.

**Cloud-based dispatching centre:** Holaluz launched this year the first dispatching centre based on Cloud technology together with Amazon Web Services (AWS) and Green Eagle Solutions. Its main objective is to help the System Operator (Electricity Grid) to balance generation and demand at all times, enable greater and better integration of renewable facilities and ensure the quality of energy supply. It also allows for better resource management, improved response quality and greater scalability.

**New app for customers:** the company has launched a new customised app adapted to customer needs during 2022. With this new service, customers can overview all details on their electricity contracts, the exact status of their solar installation process and have a direct communication channel with the company.



The security and trust of customers is key for Holaluz. For this reason, at the end of 2022 the company has **joined an initiative promoted by AdDigital and Éticas Foundation that aims to develop a certificate of algorithmic transparency for companies to provide "trust and security" to citizens and companies** within the agenda on artificial intelligence of the Government of Spain and the EU, promoting the responsible use of algorithms and artificial intelligence systems. The project is currently in the development phase and the goal is to finalise it in 2023.



# Recognitions



In January 2023, Holaluz **topped the ESG Risk ranking by Sustainalytics** - a leading ESG research and ratings agency - in the subcategory of Independent Power Production and Traders. In January 2022, the company was recognised as one of the companies with the best ESG risk rating in the industry (utilities) and region (EMEA) categories.



**Confianza Online** is the leading Internet quality certificate in Spain, and Holaluz is certified as a company that guarantees maximum transparency, security and trust when shopping on and browsing its website.



In 2018, Holaluz was the first European energy company to join the **B Corp** movement. In 2022, the company updated its impact business model, achieving a higher score than in 2018, taking the first place in its sector of companies with revenue over 1.5 million in Spain.



Holaluz is the first Spanish electricity company to obtain the **Baby-Friendly Company** certificate, which recognises companies facilitating work-life balance.



Founding company of **Conscious Capitalism** in Spain, whose philosophy recognises the innate potential for business to improve the world.



**Business case study published** by IESE Business School and Harvard Business School.





A photograph of a forest path with tall trees and autumn foliage. A family of three is walking away in the distance. The image is overlaid with a vertical gradient from pink on the left to orange on the right.

# 02 ESG Commitment



# ESG Strategy 2021-2023

Holaluz was born ESG. It now leads the transformation of the energy sector, generating shared value for stakeholders, responding to their needs and expectations, and maximising the positive impact on society and the environment.

The company has a cross-functional **Impact Team** of key managers from all areas that ensure the company's strategy aligns with the company's purpose, maximising positive impact and its contribution to the Sustainable Development Goals (SDG). The team also monitors the implementation of the commitments, strategies and objectives listed in the [ESG Policy](#) and developed in the **ESG Strategy 2021-2023**.

Strategic lines

SDGs

### Customer Obsession

- Customer experience
- Honest relationships with customers

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### People Centricity (Team)

- Organizational culture and values
- Diversity and women empowerment
- Team wellbeing
- Talent management

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### Sustainable Business

- Provide access to sustainable energy
- Partner with suppliers and business allies
- Environmental business performance

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### Act with Responsibility & Build Trust

**Strategic lines**

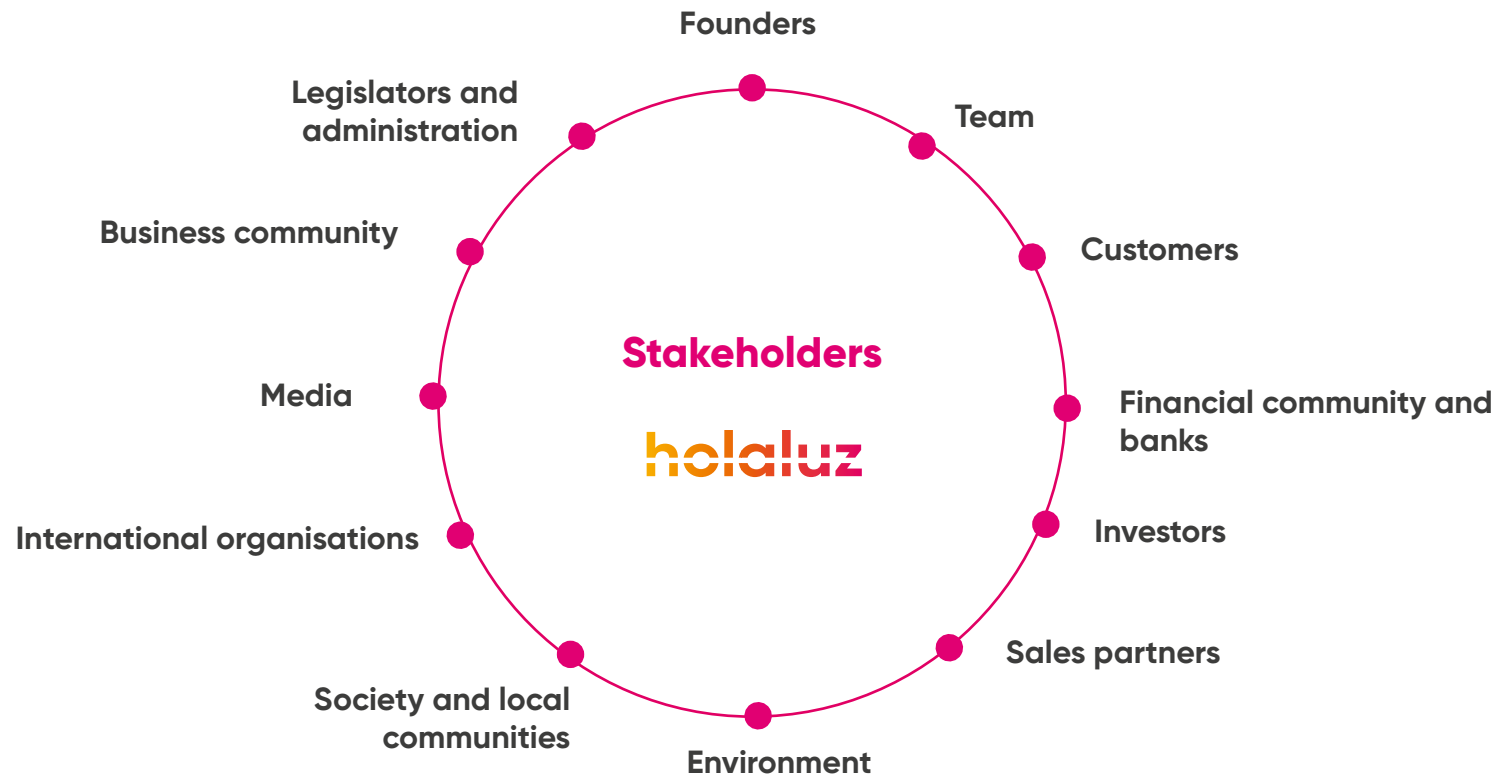
- Strong corporate governance
- Corporate transparency
- Social commitment

**SDGs**

# Stakeholders

The organisation has identified and classified its main stakeholders as:

Building **trust** is essential for Holaluz. **Honesty and transparency** are crucial for supporting healthy, long-lasting relationships, as a open dialogue with stakeholders through a variety of channels (customer portal, social networks, Customer Care team, regular investors' report, annual reports, impact reports, etc.). The company has a [Policy on Communication and Contacts with Shareholders, Institutional Investors and Proxy Advisors](#) which defines and establishes the principles and criteria governing communication and contacts with these agents.



# Double materiality analysis

In 2022, Holaluz updated its materiality analysis to identify the most important sustainability aspects to its stakeholders and the most relevant to the organisation. A **double materiality** evaluation was then conducted, considering the financial perspective and how aspects of sustainability can affect the organisation's performance.

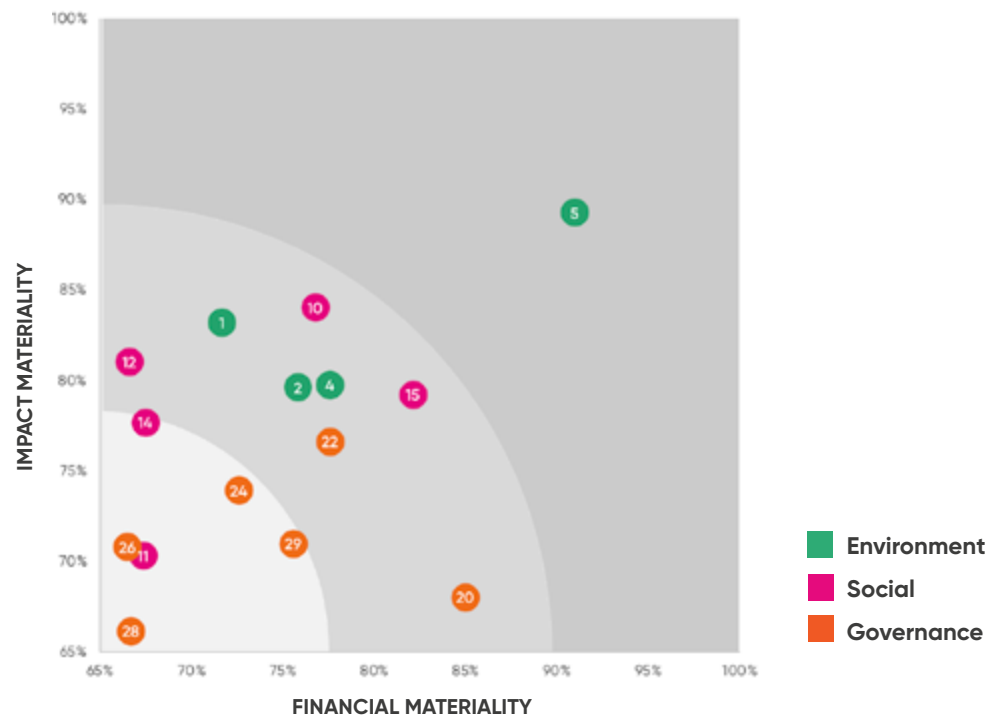
The analytical process was divided into **three stages**:

- 01 Identifying and updating material aspects.** The aspects identified in 2020 were validated and complemented based on the provisions of the future Directive on Corporate Sustainability Information and questions posed within the company.
- 02 Financial diagnosis** (financial materiality or the impact of Holaluz's financial value). For the financial materiality analysis, stakeholders - in this case major shareholders and investors - were asked about the importance they attached to each matter identified from a financial perspective.
- 03 Impact diagnosis** (materiality of impact on society and on the environment). The topics analysed were drawn from the dialogue with stakeholders.

## MATERIALITY MATRIX

The result of the analysis is a materiality matrix with a dual perspective, according to the impact on the value of Holaluz ("Financial materiality") and the impact on society and the environment ("Impact materiality"). The following aspects were identified as material during this period:

Annex III, "Index of the contents of Law 11/2018" contains the material topics required by Law and include the material topics obtained in the process of the materiality analysis, as well as selected Global Reporting Initiative Standards (GRI).



## List of material aspects

- 1** GHG emissions and decarbonization
- 2** Climate change risks and opportunities
- 4** Responsible commercialization, electrification and energy management
- 5** Energy transition
- 10** Talent development and team wellbeing
- 11** Company culture
- 12** Equal opportunities (diversity and inclusion)
- 14** Sustainable supply chain
- 15** Customer obsession
- 20** Financial performance
- 22** Strategy and long term planning
- 24** Innovation and digitization
- 26** Ethics and integrity
- 28** Risk management and crisis response
- 29** Stakeholders relationship



# ESG Impact Analysis

In 2022, Holaluz started an ESG Impact Analysis, integrating different measurement models. It has drawn on the Global Impact Investing Network (GIIN) IRIS+ impact framework and considered the SDG Compass guidelines to understand the impacts of the company's business model on the SDGs.

Holaluz's ESG impact framework is focused on four themes which are directly and indirectly linked to its purpose: **green energy, climate change mitigation, quality employment and clean air**. To analyse the impact of each theme, a series of objectives were established to measure the performance of operations and 'output' projects and, finally, to measure the 'outcome'.

Output and outcome are commonly used terms in the sustainability field. **Output** refers to the result or tangible product of a process or action, such as the number of tonnes of waste recycled by a business. **Outcome** refers to the final result or broader impact of a process or action, such as the reduction of a company's carbon footprint. In short, outputs are the measurements obtained from a process, while outcomes are the impacts.

Additionally, a subgroup of management indicators, associated with the reporting standards used in this Integrated Report, has been identified, which has a direct impact on the SDGs identified.



**OBJECTIVE 1: Transformation of the energy sector (The Rooftop Revolution)**

- **Contribution to generated distribution**  
3.8% of the households that produce solar photovoltaic energy are Holaluz customers.
- **Impact on the price per KWh for home energy system**  
71.4% savings on the price per KWh of the Holaluz home energy system vs. the home without solar installation

**OBJECTIVE 2: Accelerating the energy transition through innovation and technology**

- **Contribution to R&D in the solar photovoltaic industry**  
4.8% Holaluz's R&D investment out of the total R&D investment in the sector
- **Increase in training compared to national average**  
12.1x times the hours of training provided by Holaluz for every hour of training in Spain

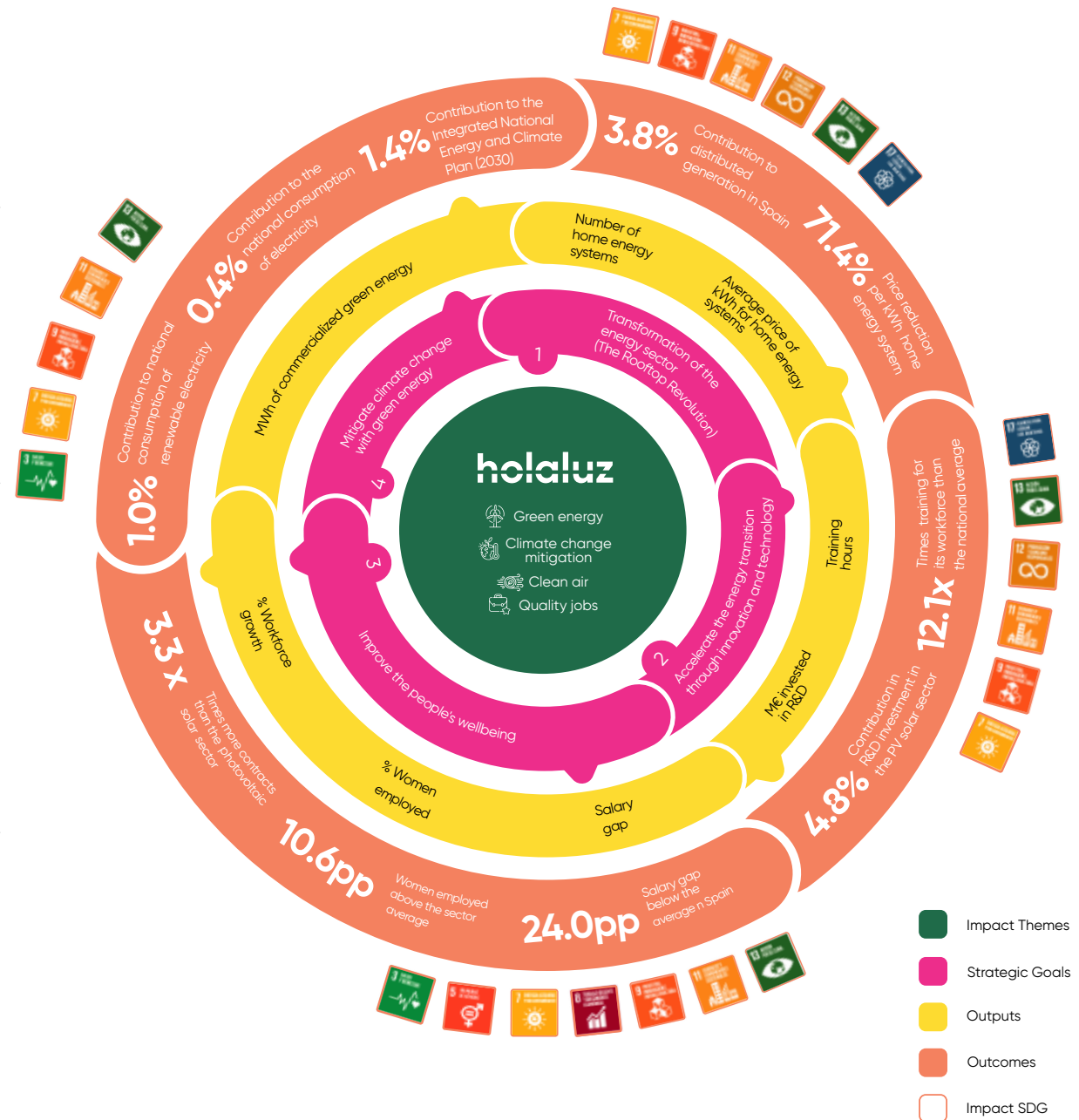
**OBJECTIVE 3: Improving people's wellbeing**

Sector by creating quality employment and promoting gender parity.

- **Employment growth compared to the solar photovoltaic industry**  
3.3x times Holaluz's contracting compared to the sector's order intake
- **Contribution to women employability**  
10.6ppts presence of women in Holaluz above the renewable energy industry
- **Contribution to reducing the gap in Spain**  
24 ppts gender gap below the national average at Holaluz

**OBJECTIVE 4: Mitigating climate change through green power**

- **Contribution to the national consumption of renewable electric energy**  
1.0% of Holaluz' market share of the national renewable electricity mix
- **Contribution to national electricity consumption**  
0.4% of Holaluz' market share in the national electricity sector
- **Contribution to the National Integrated Energy and Climate Plan (2030)**  
1.4% Holaluz' contribution to the national renewable energy target







# 03 Economic Impact



## Consolidated financial results

As of December 31, there were ~300,000 contracts. The main reason for the reduction in the customer portfolio in 2022 is the discontinuation of the gas marketing business, which was completed during the fourth quarter of 2022 (further details below) and affected approximately 70,000 customers. As of December 31, 2022 there were 4,000 active gas contracts. Excluding the discontinuation of the gas business, the number of contracts remained stable.

More than 90% of Holaluz's customers are households and the rest are SMEs with a household behaviour. It is a highly atomised portfolio with an average bill per customer between 80–100 euros per month. Bills are issued on a calendar-month basis. The process for collecting the energy consumed during the month takes place during the first working days of the following month. In the event that the bill is returned, a very strict process starts that follows the timing established by Royal Decree 897/2017 of October 7 regulating the criteria for applying the measures for cutting off power supply.

**3,412 solar panel projects** had been implemented in the solar business in 2022; within the process to consolidate The Rooftop Revolution. As shown in the table below, 2022 shows an upward trend.

| Solar installations | Q1 2022 | Q2 2022 | Q3 2022 | Q4 2022 | Total |
|---------------------|---------|---------|---------|---------|-------|
| Installed           | 551     | 763     | 830     | 1,268   | 3,412 |

At the same time, surplus management contracts have continued to increase steadily. At year-end 2022, Holaluz had **11,384 solar contracts under management**.



## Main KPIs of the consolidated income statement at December 31, 2022

Consolidated revenue at 2022 year end amounted to 919.8 million euros (571.5 million at December 31, 2021). Normalised EBITDA<sup>10</sup> amounted to 14.3 million euros (-2.1 million euros at December 31, 2021):

| €m  | 31.12.22     | 31.12.21     | % variation |
|---|--------------|--------------|-------------|
| <b>Sales*</b>                                     | <b>919.8</b> | <b>571.5</b> | <b>61%</b>  |
| energy management                                 | 889.1        | 566.1        | 57%         |
| solar   | 30.7         | 5.4          | 464%        |
| <b>Sales margin</b>                               | <b>83.2</b>  | <b>31.4</b>  | <b>148%</b> |
| <b>Normalised operating expenses<sup>11</sup></b> | <b>-49.8</b> | <b>-24.9</b> | <b>100%</b> |
| <b>Normalised EBITDA<sup>12</sup></b>             | <b>14.3</b>  | <b>-2.1</b>  | <b>-</b>    |
| <b>EBITDA</b>                                     | <b>-0.2</b>  | <b>-7.3</b>  | <b>-</b>    |

<sup>10</sup> Normalisation of EBITDA derives from the accounting change introduced by the Resolution dated February 10, 2021 issued by the Spanish Accounting and Audit Institute (ICAC) enacting the regulations for recognising, measuring and preparing financial statements for the recognition of revenue from the delivery of goods and rendering of services. The said resolution provides that incremental costs of obtaining a contract shall be recorded as Short-/Long-term Periodifications in the assets side of the consolidated balance sheet and under Other operating expenses in the consolidated income statement.

That is, customer acquisition costs are no longer amortised, but the portion corresponding to the year is taken to the income statement (to advertising and publicity) and the rest is accrued in the balance sheet. This criterion has been adopted as from January 1, 2021, amending the comparative figures in both the balance sheet and the income statement.

The impact of ICAC's resolution on the calculation of EBITDA amounts to 5.2 million euros at December 31, 2022. Normalised EBITDA has been calculated by reclassifying 14.5 million euros related to OPEX to Depreciation and Amortisation, following the criterion applied in prior years and prior ICAC's resolution.

As EBITDA, normalised operating expenses do not include accruals (previously amortisation of customer acquisition costs). They do not include the "Other income" heading. Normalised operating expenses have been calculated based on Other operating expenses amounting to 64.3 million euros (30.1 million euros at December 31, 2021) and reclassifying 14.5 million euros related to OPEX to Depreciation and Amortisation, following the criterion applied in prior years and prior ICAC's resolution (5.2 million euros in 2021).

<sup>12</sup> EBITDA and Operating expenses have been normalised considering the customer acquisition costs as CAPEX/amortisation, in line with the vision that company management has of them. On February 10, 2021 a resolution issued by ICAC, the Audit and Accounting Institute, enacted a regulation on the recording of customer acquisition costs and established that they had to be considered in the Company's assets as current/non-current periodifications and the corresponding accrual shall be included in Operating expenses.

\*€919.8m Sales include: €30.7m solar revenues, €468.4m energy , management revenues, €420.7m Rtm revenues.

## SALES

In 2022, the Company showed revenue of 919.8 million euros (571.5 million euros in 2021). This 61% increase was due to (i) the increase in the volume of represented energy; (ii) the high electricity prices as a result of collapsed energy markets; and (iii) growth in the solar business. Revenue from the **energy management** business (commercialisation of electricity and gas and representation and management of solar panel installation surpluses) was 1.57 times higher in 2022 than in 2021. Revenue from the solar business (solar panel installation projects) was 5.7 times higher than in 2021.

Revenue from **electricity and gas commercialisation** accounted for 51% (52% in 2021) of total revenue. The amounts billed were 1.6 higher than in the same period of the prior year.

The sale of **solar panel installations** increased from 1% to 3% over total revenue from consolidated sales. Revenue from solar projects also includes projects that the subsidiary Rooftop Revolution, SL (wholly-owned by Holaluz-Clidom, SA) finances through 15-year loans granted to customers. The repayment of the loan (fixed monthly instalment of principal + interest) is offset by a fixed

portion of surplus savings generated by the installation that Holaluz purchases from the customer so that once the loan is repaid, the saving for the customer, compared to the current electricity bill, may be more than 60%. Revenue from solar substantially increased in percentage terms (+471%), from 5.4 million euros at December 31, 2021 to 30.7 million euros at December 31, 2022, as a result of the Solar First strategic approach of The Rooftop Revolution<sup>13</sup>.

As a result of strong growth in the representation activity, due to both represented energy and the price at which this energy has been sold (in a context of rising prices from mid-2021 to the fourth quarter of 2022), the weight in revenue from this activity doubled in 2021 up to 47%, remaining stable in 2022 at 46%.

Although Holaluz does not obtain profit from the representation business, it does allow the Parent Company to compensate its selling position (as a representative agent) and buying position (as a supplier) in OMIE. Therefore, the final amount to be paid on a weekly basis in OMIE is the net resulting amount. The purpose of Holaluz is to reach a balance between buying and selling positions to reduce to a minimum the guarantees to be given in OMIE. This activity is also interesting for working capital management purposes, which is essential in an environment in which power marketers must pay their energy purchases weekly and do not get paid from their customers until the following month. The large representation contracts that have been concluded since the second half of 2020 and over 2021 and 2022 have allowed the Group to increase the amount of energy represented in the market up to 3.6GWh at December 31, 2022. As a result, revenue of the representation activity has substantially increased, amounting to 420.7 million euros in 2022 (269.2 million euros at December 31, 2021), that is, 1.6 times higher than last year's.

As energy markets are integrating until reaching the European Energy Union, positioning in the several European markets and integration has been key to companies. In the first place, Holaluz has focused on Portugal, a market that is already integrated with the Spanish market through OMIE. For that purpose, the subsidiary Clidomer was incorporated in 2018. This is a company wholly owned by the Parent Company Holaluz-Clidom, SA, whose representation activity started in July 2018. The Portuguese subsidiary, focused exclusively on the representation business and PPAs, shows revenue of 26.0 million euros (70.6 million euros at December 31, 2021).

OMIE is the electricity market operator in the Iberian Peninsula where almost all energy purchase and sales transactions are closed. It is a market where energy that is actually going to be produced by the generators and consumed by the customers is purchased. 24 auctions are held every day (plus intraday auctions). The matching price (purchase – sale) varies hour by hour and, consequently, it is indispensable that margin is guaranteed by means of financial futures contracts and power purchase agreements (PPAs). These futures transactions to ensure margin are necessary because the selling price to the customer is fixed over 12 months, whereas the price of energy in OMIE is highly variable. Thus, through financial derivatives (mainly futures and forwards to which the PPAs explained below have been added) and physical PPA's Holaluz can cover price fluctuations in the energy market.

<sup>13</sup> Additionally, Holaluz, through its subsidiary Clidom Solar, installs solar panels for rooftop owners and manages their energy production, offering in exchange a monthly fixed discount in their electricity bill as from the first month. Holaluz works on a several stage plan that prioritises private rooftops in its launch stage. In the following stage, the proposal will be extended to communal rooftops and services sector rooftops. The sales margin of installations funded through the subsidiary Rooftop Revolution, SL is reflected in the subsidiary Clidom Solar, SL (wholly owned by the parent) and in the consolidated financial statements. The parent Holaluz-Clidom, SA acts solely as an agent for collecting the loan instalment, included in the monthly electricity bill, which also includes the fixed portion of surplus savings. The proceeds from this loan instalment is subsequently transferred to the subsidiary Rooftop Revolution, SL as the holder of the loans.



## GROSS MARGIN

Holaluz's goal is to sell green energy with a margin to paying customers.

**In 2022, year-on-year consolidated margin amounted to 83.2 million euros** (31.4 million euros in 2021), which means a 165% YoY increase, equal to 9% of sales (5.5 in December 2021). The margin for 2022 in **energy management** has increased from 5.4% (December 2021) to 8.1%. In a context of high volatility in energy prices in the electricity market (OMIE), stable costs in energy sales is achieved through an optimal hedging strategy that guarantees gross margin and, consequently, business profitability. The Company closes futures deals in Spanish (OMIP and MEFF) and international (EEX) financial energy markets, PPAs (both physical and financial) and also OTCs (Over the Counter) deals to hedge the energy purchased for its customers and thus cover the risk of fluctuations in prices and the corresponding impact on trade margin. In the **solar** business gross margin has grown by 36% in 2022.

Personnel expense has substantially increased in 2022 from 2.3% over total sales in December 2021 (13.4 million euros) to 3.2% (29.5 million euros). The structure of the solar team has been expanded with the hiring of solar experts (sales people) and installers to reach a substantial amount of internal installations in 2023.

**Normalised operating expenses** amounted to 49.8 million euros (24.9 million euros at December 31, 2021), equal to 5.4% of sales (4.4% in 2021). They have grown compared to revenue mainly to prepare Solar for scale-up. Normalised operating expenses have been calculated by reclassifying 14.5 million euros related to OPEX to Depreciation and Amortisation, following the criterion applied in prior years and prior ICAC's resolution (5.2 million euros in 2021).

**Normalised EBITDA amounting to 14.3 million euros is 7 times higher than in the same period of the prior year** (-2.5 million euros). Stable operating and personnel expenses in the **energy management** business, together with an improvement in the gross margin for the marketing of electricity and gas, has allowed Holaluz to **finance growth in the solar business** and overcome consolidated losses of -2.5 million euros in 2021, reaching positive normalised EBITDA of 14.3 million euros in 2022.

This increase in normalised EBITDA allows Holaluz to improve **net profit/(loss) for the year** in 2022 (-5.1 million euros) compared to losses of 8.4 million euros in 2021.



## BALANCE SHEET

Holaluz uses PPAs to buy a portion of the energy that it sells to its customers. At year-end, the Parent Company and the Portuguese subsidiary Clidomer have signed a total of 46 PPAs (purchase of energy from renewable energy producers) for the physical delivery of energy at a fixed price at the beginning of the agreement and for a determined period of time ranging between 1 and 10 years. These agreements, due to their nature (physical delivery of energy), are not considered hedging derivative contracts. Consequently, they are not presented in the consolidated balance sheet (nor the potential tax effect thereof). However, the Directors consider that they must be considered in order to analyse the perspective and understand the Company's financial position as a whole.

The fair value of these contracts considering the MtM, that is, considering the amount of energy to be delivered, the period and the expected price, amounts to 93 million euros (158 million euros at December 31, 2021), of which 53.4 million euros are expected to materialise during 2023 and the rest, 39.6 million euros, from 2024 onwards.

Consequently, in order to show the cash flows, assets and obligations for next year, the directors have decided to present the Company's balance sheet that would result from giving rise to the aforementioned PPAs (unrealised assets) as well as the related potential tax effect at December 31, 2022 and 2021 (for comparative purposes):

<sup>14</sup> The review of the normalised balance sheet is not part of the audit procedures carried out to review the financial statements for the year ended December 31, 2022, which are established in the verification of accounts in accordance with Spanish GAAP. The normalised balance sheet is obtained from adding the MtM of physical PPAs at 12.31.22, 93 million euros, to the audited trial balance, in accordance with financial management reports of the Parent Company.

## Assets<sup>14</sup>

| € m                           | (normalised) |              | (Spanish GAAP) |              |
|-------------------------------|--------------|--------------|----------------|--------------|
|                               | 31.12.22     | 31.12.21     | 31.12.22       | 31.12.21     |
| <b>NON-CURRENT ASSETS</b>     | <b>124.2</b> | <b>96.7</b>  | <b>84.6</b>    | <b>66.1</b>  |
| Intangible assets             | 31.7         | 15.5         | 31.7           | 15.5         |
| Property, plant and equipment | 2.1          | 0.8          | 2.1            | 0.8          |
| Financial investments         | 52.6         | 36.5         | 13.0           | 5.7          |
| Deferred tax assets           | 19.5         | 20.7         | 19.5           | 20.7         |
| Long Term Periodif.           | 18.4         | 23.4         | 18.4           | 23.4         |
| <b>CURRENT ASSETS</b>         | <b>246.3</b> | <b>344.7</b> | <b>192.9</b>   | <b>217.4</b> |
| Inventories                   | 14.0         | 2.4          | 14.0           | 2.4          |
| Trade and other receivables   | 121.8        | 83.1         | 121.8          | 83.0         |
| Financial investments         | 86.6         | 238.9        | 33.2           | 111.6        |
| Short Term Periodif.          | 13.6         | 10.5         | 13.6           | 10.5         |
| Cash and cash equivalents     | 10.3         | 9.9          | 10.3           | 9.9          |
| <b>TOTAL ASSETS</b>           | <b>370.5</b> | <b>441.5</b> | <b>277.5</b>   | <b>283.5</b> |



In accordance with Spanish GAAP, at 2022 year-end **Holaluz's consolidated balance sheet amounted to 277.5 million euros** (283.5 million euros at December 31, 2021). The variation of -6.0 million euros is mainly due to: (i) an increase in fixed assets (property, plant and equipment and intangible assets) and in loans to customers of The Rooftop Revolution, and (ii) a reduction in current assets of 24.5 million euros basically as a result of the decrease in current derivatives (see comment below).

The increase in **intangible assets** includes the capitalization of work performed by the company for an amount of 7.0 million euros at December 31, 2022 (4.5 million euros at December 31, 2021). It corresponds to the technological innovation project related to the vertical integration of all distributed generation and **Smart Supply** processes (billing by monthly fixed fees) in which the company has been immersed since the beginning of 2021 (4.7 million euros), as well as capitalisation of all development projects related to automation and scalability in the **solar** business (2.3 million euros).

The increase in **property, plant and equipment** is due to the renovation works and installations carried out in the Barcelona **headquarters**, and has been recorded entirely in the Parent Company.

The balance of 13 million euros in **non-current financial investments includes 7.4 million euros from loans for solar panel installations** to be repaid in fixed instalments over the next 15 years and charged on a monthly basis in the customer's electricity bill. These loans were granted as proof of concept for raising an SPV. Holaluz has no intention of granting any further loans until the SPV is raised. Additionally, there are **non-current derivatives** amounting to 4.7 million euros (2.5 million at December 31, 2021).

In the preparation of the consolidated balance sheet, the ICAC's resolution dated February 10, 2021 has been considered, which sets forth that incremental costs of acquiring a contract shall be accounted for as current/non-current periodification in the balance sheet, whereas in the income statement they shall be recorded under "Other operating expenses". This criterion has been applied in the Parent Company since January 1, 2021. At December 31, 2022 a total amount of 32.0 million euros has been capitalised under **non-current or current accruals** (33.9 million euros at December 31, 2021) substantially for incremental costs of acquiring customers.

At December 31, 2022 **current assets** in the consolidated balance sheet in accordance with Spanish GAAP amount to **192.9 million euros**, of which 30.4 million euros are **derivatives** (103.5 million euros in December 2021). **Inventories** include gas not consumed by customers due to the discontinuation of this activity in the last quarter of 2022. **Trade receivables** have significantly increased compared to the prior year (+38.7 million euros) as a result of the rise in prices applied at the beginning of 2022 to electricity and gas bills, as well as the increase in solar activity. It should be noted that as a result of the several Spanish Official Gazettes (BOEs) that have come into effect since June 2021, electricity VAT has been reduced from 21% to 10% (June 2021) and to 5% (June 2022); and gas VAT has been reduced from 21% to 5% (September 2022). As a result, VAT payable to public administrations amounts to 18.6 million euros at December 31, 2022.

**Cash** has slightly increased up to 10.3 million euros at December 31, 2022 (9.9 million euros at December 31, 2021). The movements in **net debt** are as follows:

## Net debt

| € m                         | 31.12.22    | 31.12.21    |
|-----------------------------|-------------|-------------|
| Non-current bank borrowings | 23.4        | 19.9        |
| Current bank borrowings     | 40.8        | 26.3        |
| Current other payables      | 8.4         | 10.7        |
| Cash                        | -10.3       | -9.9        |
| <b>Net debt</b>             | <b>62.3</b> | <b>46.9</b> |
| Rooftop loans               | -7.5        | -2.6        |
| <b>Adjusted net debt</b>    | <b>54.8</b> | <b>44.3</b> |



**Rooftop loans** are loans for solar panel installations granted to customers that are to be repaid over the next 15 years in fixed instalments included in the monthly electricity bill. These loans are a proof of concept for raising an SPV; Holaluz has no intention of granting any further loans until the SPV is raised. The year-on-year amount of the loans has been deducted since it is considered that they should not be part of the balance sheet in a continuing context of business activity, but rather be transferred to the raised SPV.

At December 31, 2022, **consolidated adjusted net debt** amounted to **54.8 million euros**, 10.5 million euros higher than at December 2021. This increase in debt is due to the investment being made by the parent company, Holaluz-Clidom, SA, to finance the solar business and foster its growth and scalability in order to create long-term value in two businesses, **energy management** and **solar**, that feed back into each other in terms of profit generation.

Consolidated **shareholders' equity** (in accordance with Spanish GAAP) decreased by 5.1 million euros in 2022, reaching 42.8 million euros at year-end.

**Equity** shown in the consolidated balance sheet includes the **valuation adjustments** from the recording of the Parent Company's derivatives for the amount of **-23.2 million euros** at December 31, 2022 (-40.8 million euros at December 31, 2021); data in accordance with Spanish GAAP. This amount corresponds to 75% of the difference between the spot price on December 31 and the price at which the hedging deals were closed (25% of the MtM price is recorded in deferred taxes). It should be noted that this data is not complete within Holaluz's hedging strategy, as the impact of the MtM of the physical PPAs should be included, which gives rise to equity of 89.4 million euros at year end (125.6 million at December 31, 2021).

## Liabilities<sup>15</sup>

| € m                            | (normalised) |              | (Spanish GAAP) |              |
|--------------------------------|--------------|--------------|----------------|--------------|
|                                | 31.12.22     | 31.12.21     | 31.12.22       | 31.12.21     |
| <b>EQUITY</b>                  | <b>89.4</b>  | <b>125.6</b> | <b>19.7</b>    | <b>7.1</b>   |
| Capital and reserves           | 42.8         | 48.0         | 42.8           | 48.0         |
| Valuation adjustments          | 46.6         | 77.7         | -23.2          | -40.8        |
| <b>NON-CURRENT LIABILITIES</b> | <b>59.3</b>  | <b>87.3</b>  | <b>36.1</b>    | <b>47.8</b>  |
| Long-term debt                 | 36.1         | 47.8         | 36.1           | 47.8         |
| Deferred tax liabilities       | 23.3         | 39.5         | 0,0            | 0.0          |
| <b>CURRENT LIABILITIES</b>     | <b>221.8</b> | <b>228.5</b> | <b>221.8</b>   | <b>228.5</b> |
| Short-term debt                | 77.6         | 104.8        | 77.6           | 104.8        |
| Trade and other payables       | 144.0        | 123.1        | 144.0          | 123.1        |
| Accruals                       | 0.3          | 0.7          | 0.3            | 0.7          |
| <b>TOTAL LIABILITIES</b>       | <b>370.5</b> | <b>441.5</b> | <b>277.5</b>   | <b>283.5</b> |

<sup>15</sup> The review of the normalised balance sheet is not part of the audit procedures carried out to review the financial statements for the year ended December 31, 2022, which are established in the verification of accounts in accordance with Spanish GAAP. The normalised balance sheet is obtained from adding the MtM of physical PPAs at 12.31.22, 93 million euros, to the audited trial balance, in accordance with financial management reports of the Company.

At the general meeting held on October 25, 2019, the Parent Company's shareholders resolved to increase capital through a public offering of shares paid with monetary contributions in order to increase the Company's shareholders' equity by a maximum amount of 30 million euros (nominal amount + share premium). Next, it was resolved that all the shares issued through the said public offering be traded on BME Growth so that the Company's Board of Directors could execute the corresponding capital increase amounting to 30 million euros, fully paid in.

On September 30, 2021, given the chance of carrying out potential acquisitions of electricity retailers, arisen as a result of the upward trend in the wholesale market electricity prices, and thus speed up its organic growth plan, the Parent Company entered into a subordinated financing transaction convertible into Company shares for the amount of 11.36 million euros, whose conversion was approved by the shareholders at the general meeting held on November 9, 2021, through the corresponding capital increase for the same amount.

Additionally, on December 10, 2021, it was resolved to carry out a capital increase through monetary contributions for an aggregate effective amount of 7.5 million euros (nominal amount + share premium), which was finally executed for a value of 6.7 million euros (nominal amount + share premium), fully paid in by qualified investors.

As a result of these transactions, since December 2021 the Parent Company's share capital has amounted to 656,661.57 euros, fully subscribed and paid in, and consists of 21,888,719 ordinary shares with a par value of 0.03 euros each. There have been no changes in 2022.

**Non-current liabilities** in the consolidated balance sheet, in accordance with Spanish GAAP, amounted to **36.1 million euros** (47.8 million euros at December 31, 2021). The variation is mainly due to the reduction of 15.2 million euros in the Parent Company's **non-current derivatives**, amounting to 12.7 million euros at December 2022 (27.9 million euros at December 2021). **Non-current bank borrowings** amount to 23.4 million euros at year-end and correspond almost entirely to the Parent Company.

Consolidated **current liabilities** in accordance with Spanish GAAP have decreased, amounting to **221.8 million euros** (228.5 million euros at December 31, 2021). **Short-term debt** decreased by 27.2 million euros due to: (i) a reduction of 39.4 million euros in current derivatives; and (ii) an increase of 12.2 million euros in bank borrowings and other financial liabilities, both corresponding to the Parent Company. **Accounts payable to suppliers and creditors** have increased by 20.9 million euros, amounting to 143.9 million euros at 2022 year end.

The average payment period to suppliers is 51 days, as disclosed in Note 16.1 to the financial statements 'Information on the average payment period to suppliers. Additional Provision Three. 'Disclosure requirements' of Law 15/2010, of July 5'.

## Working Capital

In 2022, Holaluz group companies have been subject to continuing working capital requirements mainly to finance the purchase of stocks for the solar business (in the middle of a growth and consolidation process) and due to the increase in accounts receivable as a result of the rise in electricity and gas prices for customers.

| € m                               | 31.12.22 | 31.12.21 |
|-----------------------------------|----------|----------|
| Working capital                   | -8.2     | -37.7    |
| Accounts receivable + inventories | 135.7    | 85.4     |
| Accounts payable                  | 144.0    | 123.1    |

In 2022, **operating cash flows** amounted to 24.2 million euros, compared to 30.9 million euros in 2021, mainly due to the impact of the items in non-cash hedging costs, whose outflow basically occurred in the fourth quarter of 2021. These are deals closed in EEX, where MtM is settled on a daily basis. In a scenario of rising prices back then, cash flow requirements arose for operations maturing in 2023 and subsequent years. There were also margin calls from bilateral derivative contracts entered into with counterparties. For 2023 the amount recognised in the Parent Company's P&L amounts to 48 million euros, of which 23 million euros correspond to MtM settlements on EEX and 25 million euros correspond to margin calls. Additionally, the subsidiary Clidom Solar stocked up panels, inverters and other minor equipment items with the resulting impact on supplier balances. **Cash flows from investments** decreased from 101 million euros last year to 39.5 million in 2022. **Cash flows from financing activities** declined by 30.2 million euros, from 46 million euros in 2021 to 15.8 million euros in 2022. The company's debt has increased by 15.8 million euros to finance rises in working capital and investment requirements.

## Cash Flows

| € m  | 31.12.22     | 31.12.21      |
|--|--------------|---------------|
| <b>CASH FLOWS FROM/(USED IN) OPERATING ACTIVITIES</b>      | <b>24.2</b>  | <b>30.9</b>   |
| Profit/(loss) before tax                                   | -8.7         | -12.3         |
| Adjustments to profit (+/-)                                | 72.5         | 9.5           |
| Change in working capital (+/-)                            | -36.8        | 34.5          |
| Other cash flows from/(used in) operating activities (+/-) | -2.8         | -0.8          |
| <b>CASH FLOWS FROM/(USED IN) INVESTING ACTIVITIES</b>      | <b>-39.5</b> | <b>-101.0</b> |
| Payments on investments (-)                                | -39.5        | -101.0        |
| Proceeds from disposals (+)                                | -            | -             |
| <b>CASH FLOWS FROM FINANCING ACTIVITIES</b>                | <b>15.8</b>  | <b>46.0</b>   |
| Proceeds from and payments on equity instruments (+/-)     | 0.0          | 18.1          |
| Proceeds from and payments on financial liabilities (+/-)  | 15.8         | 0.0           |
| <b>NET INCREASE/DECREASE IN CASH AND CASH EQUIVALENTS</b>  | <b>0.4</b>   | <b>-24.1</b>  |
| Cash and cash equivalents at the beginning of the period   | 99           | 34.0          |
| Cash and cash equivalents at the end of the period         | 10.3         | 99            |



## Major events affecting Holaluz after the balance sheet date

No subsequent events have occurred from the balance sheet date until the date these financial statements were authorised for issue.

## Holaluz outlook

Holaluz implements the actions described in the Business Plan, focusing on increasing the number of customers and the product and services portfolio:

- Development and consolidation of the business plan for The Rooftop Revolution.
- Increase in the pace of acquiring contracts.
- Margin guaranteed by market price hedges.
- Structural costs under control due to continuous implementation and enhancement of scalability projects.
- Investments in innovation to make technology the common place in the development of energy-related products and services and create an ecosystem of generation, consumption, optimization and control of energy.
- Actions to acquire bilateral contracts with renewable plants that allow the Company to continue encouraging sustainable growth based on 100% green energy.

## Research and development activities

As a technological company, continuous research activities are carried out, as well as investments in innovation to make the use of technology the common place in the development of energy-related products and services and create an ecosystem of generation, consumption, optimization and control of energy.

## Acquisition of treasury shares

The Parent Company has treasury shares for an amount of 0.3 million euros at December 31, 2022, pursuant to article 262 of the Spanish Corporate Enterprises Act. Treasury shares at December 31, 2022 account for 0.28% of the Company's share capital and amount to 61,226 shares (38,194 shares at December 31, 2021), at an average acquisition price of 9.66 euros per share.

## Financial instruments

Holaluz considers that there are no risks that may affect its transactions other than those indicated in Note 18 to the financial statements.



## Sustainable finance

On November 21, 2022, the Alternative Fixed Income Market (MARF) of Bolsas y Mercados Españoles (BME) incorporated Holaluz–Clidom’s first **Green Commercial Paper Programme** for a maximum value of EUR 100 million. Through this programme, the company expects flexible access to qualified investors over the next twelve months, as part of its strategy to diversify sources of funding. Holaluz designed the green bonds issued under this programme to be recognised as “green instruments” according to the guidelines of the **Holaluz Green Finance Framework**. This framework enables the company to issue bonds and commercial paper in compliance with the **2021 Green Bond Principles** and to enter into financing agreements according to the **2021 Green Loan Principles** of the International Capital Markets Association (ICMA). To this end, Holaluz obtained a **favourable evaluation from Sustainalytics** confirming that the Holaluz Green Finance Framework aligns with the four fundamental principles incorporated in both principles.

The company intends to finance renewable energy projects, mainly related to electricity from renewable sources and the installation and management of photovoltaic solar plants with the funds raised from the programme. This will have a positive environmental impact and contribute to achieving the Sustainable Development Goals, as well as the EU’s climate objectives.

As of December 31, 2022, there were €6.5 million of Green Bonds outstanding under this programme.

EthiFinance Ratings has given Holaluz a BB credit rating with a stable outlook.

Additionally, as part of its goal to increase its salesforce and drive the energy transition in Spain, Holaluz initiated a collaboration plan with leading financial institutions.



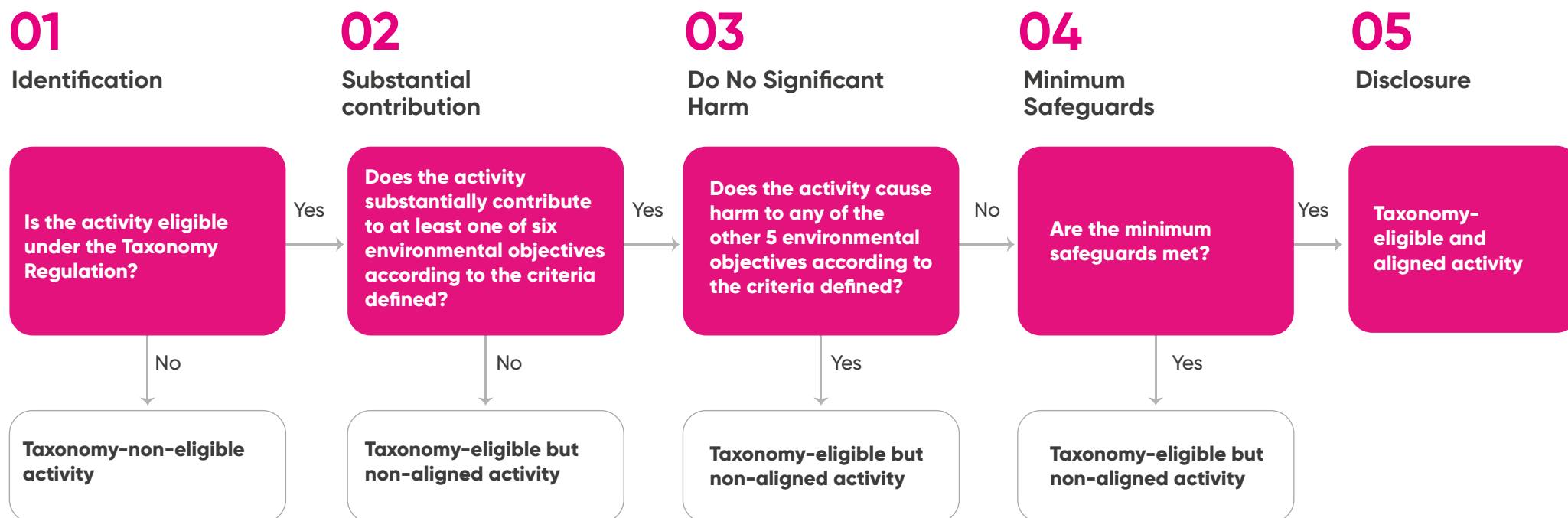
## TAXONOMY FROM THE EUROPEAN UNION

To be able to achieve its **carbon neutrality objective by 2050**, the European Commission has developed a comprehensive **policy agenda on sustainable finance** to ensure the achievement of this ambitious climate change goal, which includes the "Sustainable Finance Action Plan" of 2018, and the "Strategy for Financing the Transition to a Sustainable Economy" published in July 2021. At the heart of this Action Plan is the **EU Taxonomy Regulation**, an essential lever to achieve the goal of achieving a Net Zero European Union by 2050.

The Taxonomy Regulation is a classification tool to determine whether an economic activity is environmentally sustainable. It aims to eliminate so-called "greenwashing" and help companies develop ESG roadmaps based on scientific objectives and criteria, thus providing investors and society in general with greater transparency and certainty.

The Action Plan and, more specifically, the **Taxonomy, aligns with Holaluz's purpose: to create and live in a 100% renewable world** and makes it possible to put Holaluz's pioneering approach to pursuing an energy transition model that pursues decarbonisation in line with the EU's climate objectives. Holaluz and all the people who believe in its energy, will continue to progress toward the 2030 and 2050 objectives, and all those which are yet to come.

To establish whether Holaluz's activities are aligned with environmental objectives of the EU taxonomy, the company has analysed its activities according to its criteria to determine whether or not they are performed sustainably. For more details, see Annex II.





Based on the analysis, the following results have been obtained regarding alignment with the Taxonomy for 2022:

## ELIGIBLE AND ALIGNED ACTIVITIES

| Area of Activity   | Description of the Activity  | Link to the Taxonomy   |
|--|--|--|
| <b>Installation and management of photovoltaic installations</b> | Installation, management and maintenance of installations by means of photovoltaic solar panels. | Activity 7.6. of the Climate Delegated Act: Installation, maintenance and repair of renewable energy technologies. |

## NON-ELIGIBLE ACTIVITIES

| Area of Activity   | Description of the Activity   | Link to the Taxonomy  |
|--|---|---|
| <b>Natural gas commercialisation</b>   | Gas sales to consumers, including actions such as purchasing gas for supply to households or businesses and coordinating with distributing companies for the correct supply of gas. | This activity is not considered in the Climate Delegated Act. |
| <b>Representation and management of the sales of renewable electricity producers.</b>      | Representation in OMIE of energy generated by renewable energy producers.   | This activity is not considered in the Climate Delegated Act. |
| <b>Distributed generation and service provision within an "energy as a service" model.</b> | Use of the surplus that can be generated by a domestic photovoltaic installation for sale to customers in the vicinity (those located within 2 km of the point of generation).      | This activity is not considered in the Climate Delegated Act. |

## OTHER NON-ELEGIBLE ACTIVITIES

| Area of Activity   | Description of the Activity  | Link to the Taxonomy  |
|--|--|---|
| <b>Sales of electricity from 100% renewable sources.</b> | Purchase of energy with Renewable Guarantee of Origin (GoO) certificates, to guarantee that the energy purchased comes from a renewable source, and subsequent commercializing to customers. | This is currently considered ineligible as it is not included in the Climate Delegated Act. |

Thus, the activity of **installation and management of photovoltaic installations** carried out by Holaluz as part of the Rooftop Revolution is among the activities eligible for the Taxonomy, which makes Holaluz business a key element in the fight against climate change, and a viable and effective alternative to clean energy, which will help to achieve the ambitious EU climate goals.

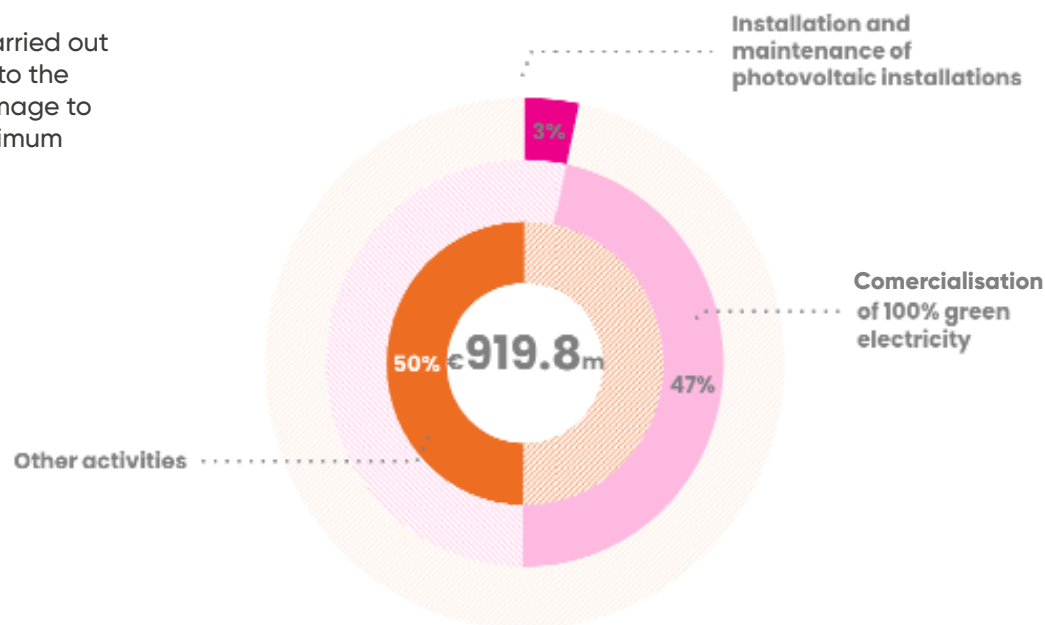
Under the current wording of the Climate Delegated Act, neither the **acquisition or sale of renewable energy** can be considered eligible under the Taxonomy, as it does not fall within the wording of any of the definitions in the Delegated Climate Act and is therefore considered an activity that does not substantially contribute to climate change mitigation. However, in time this may be revised in view of the "Goal 55" package of measures and the climate targets agreed by the Council and the European Parliament<sup>16</sup>. By supplying 100% green electricity (i.e. of guaranteed origin from renewable sources), Holaluz plays a catalytic role in the energy transition so vital to achieving the European Union's objectives. Because of this, the following section presents the results obtained, providing additional information considering sales of 100% green electricity.

<sup>16</sup> Commission Notice on the interpretation of certain legal provisions of the Disclosures Delegated Act under Article 8 of EU Taxonomy Regulation on the reporting of eligible economic activities and assets. Note 13.

In the first **reporting period**, the degree of alignment of the activities carried out by Holaluz with the EU Taxonomy, as a consequence of its contribution to the objective of climate change mitigation, without causing significant damage to the other five environmental objectives defined and respecting the minimum safeguard has been:

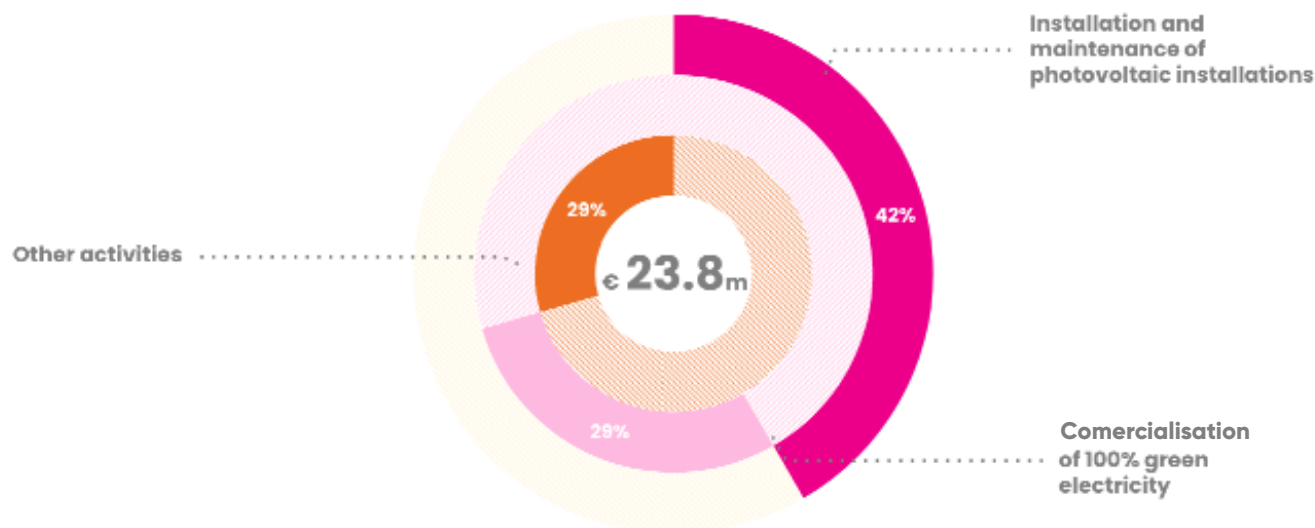
### Revenue

The total of **3.3%** of revenue was generated by eligible business activities aligned with the EU taxonomy. Including commercialisation of 100% green electricity, the proportion is **50.2%** and including representation and management of the sales of renewable electricity producers the proportion is **95.9%** of operating revenue.



### CapEx:

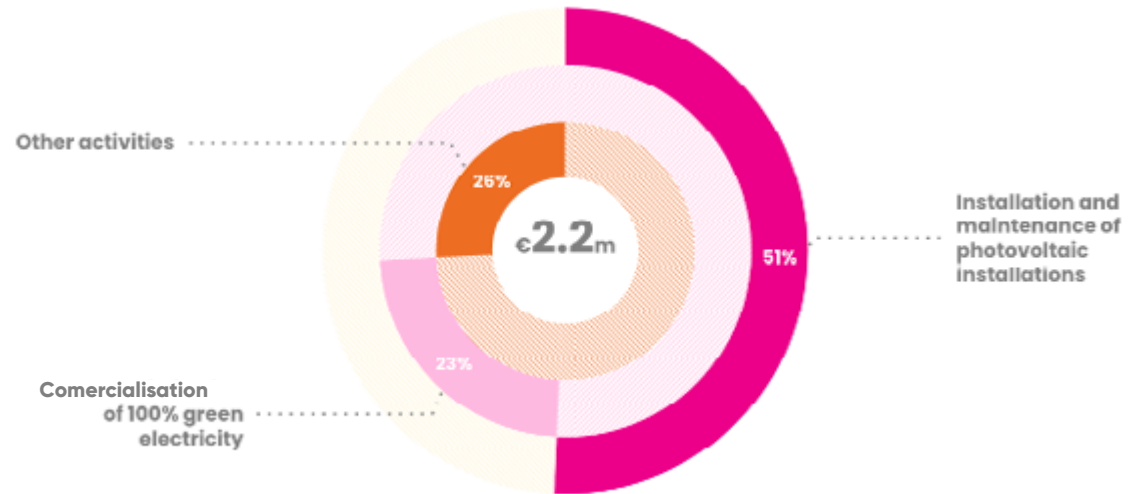
A total of **41.7%** of capital expense (CapEx) was generated by eligible business activities aligned with the EU taxonomy. Including commercialisation of 100% green electricity, the proportion is **70.6%** of the CapEx.





### OpEx

A total of **50.7%** of operating expenses (OpEx) was generated by eligible business activities aligned with the EU taxonomy. Including commercialisation of 100% green electricity, the proportion is **75.1%** of the OpEx.



For more information about Holaluz’s activities’ alignment with the mitigation and adaptation objectives in the Climate Delegated Act, see the tables in Annex II.

In 2022, Holaluz conducted a **physical climate risk analysis** linked to The Rooftop Revolution. In the next reporting period, Holaluz aims to start work on the **Task Force on Climate-related Financial Disclosures (TCFD)** to identify the company’s risks and opportunities regarding climate change.





04

# Governance



# Organisational structure

Holaluz has a governance system made up of different governing bodies, including the General Shareholders' Meeting, the Board of Directors, the Audit Committee, the Nomination and Remuneration Committee and the Compliance Committee. The commitment to good governance and business ethics is evident in the policies and procedures for the management of different areas.

Holaluz has a solid governance system and has corporate governance mechanisms and the following organisational structure to guarantee it:

- **Shareholders' General Meeting**
- **Board of Directors and Management Board**
- **Audit Committee**
- **Nomination and Remuneration Committee**
- **Compliance Committee and Compliance Officer**

At 31 December 2022, the main governing bodies are:

## BOARD OF DIRECTORS <sup>17</sup>



**Carlota Pi**  
President



**Alfonso de León**  
Vice President



**Ferran Nogué**  
Executive Director



**Oriol Vila**  
Executive Director



**Enrique Tellado**  
Independent Director



**Isabela Pérez**  
Independent Director



**Virginia Oregui**  
Proprietary Director



Nomination and Remuneration Committee

Audit Committee

**(C)** Chairman

<sup>17</sup> Years of seniority as members of the Board of Directors: Carlota Pi, Ferran Nogué and Oriol Vila, 12 years; Alfonso de León, 6 years; Enrique Tellado, Isabel Pérez and Virginia Oregui, 3 years.



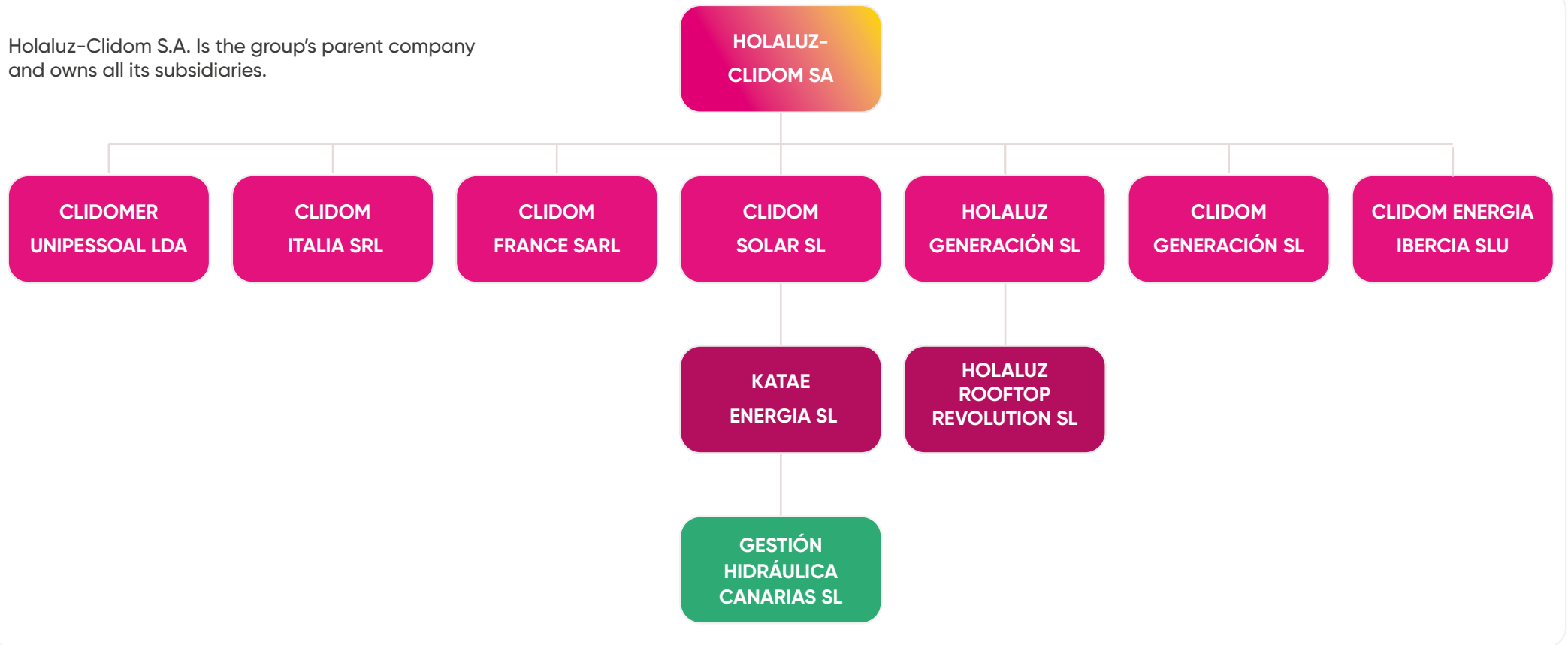
In accordance with Article 31 from the Articles of Association, Holaluz is managed and represented by a Board of Directors consisting of the number of members established by the Shareholders' General Meeting, with a minimum of five and a maximum of twelve members. There is no prior requirement to be a shareholder of the company to serve as a director. The Board of Directors is ultimately responsible for making decisions regarding the company's environmental, social and governance (ESG) affairs and for reviewing progress with ESG indicators during its meetings.

## COMPLIANCE COMMITTEE AND COMPLIANCE OFFICER

The compliance committee has three members who are responsible for detecting, preventing, handling and correcting conduct that violates the [Code of Ethics](#) and the policies that establish the company's values, behavioural guidelines, and laws that may result in liability for the organisation.

## CORPORATE STRUCTURE

Holaluz-Clidom S.A. Is the group's parent company and owns all its subsidiaries.



# Risk and opportunity management

Holaluz's business, activities and results depend on internal and external factors that affect all companies in its sector.

According to its **control and management systems**, it identifies and manages the risks to which it is exposed by using **risk maps** to identify the potential risks, while its action plans, which are used to mitigate those risks, are updated annually. Risk management is carried out according to an **annual risk management plan**, which includes the risk map and compliance programme. These documents are used to prepare the recommendations for implementation dealt with at each review. The results of the reviews are agreed and submitted to the Audit Committee.

These are some of the risks that affect the company:

| Risk factor              | Scope of Risk   |
|--------------------------|---|
| <b>Market risk</b>       | <ul style="list-style-type: none"> <li>• Electricity price and market liquidity risk</li> <li>• Risk of error estimating future demand ("deviation risk")</li> <li>• Market concentration and competition risk</li> </ul>   |
| <b>Operational risks</b> | <ul style="list-style-type: none"> <li>• Risk of non-compliance with the business plan and financial estimations</li> <li>• Derivative exposure risk</li> <li>• Company operations depend on certain key employees</li> <li>• Technology risk</li> <li>• Reputational risk</li> </ul> |
| <b>Regulatory risks</b>  | <ul style="list-style-type: none"> <li>• Holaluz operates in a regulated sector</li> <li>• Self-consumption is exposed to legal uncertainty</li> </ul>  |
| <b>Financial risks</b>   | <ul style="list-style-type: none"> <li>• Liquidity risk</li> <li>• Default risk of creditors and financing constraints</li> <li>• The Company cannot guarantee it will be able to obtain additional capital or financing</li> <li>• Credit risk</li> </ul>                            |

# Ethical business conduct

The commitment to good governance is based on two areas: the [Code of Ethics](#) and the **Regulatory Compliance Programme**.

The Board of Directors has an active role in the implementation of the governance policies, overseeing implementation, supervision and compliance with legal requirements applicable to the sector, as well as any internal policies and procedures through the Compliance Officer and the Compliance Committee.

## POLICIES AND PROCEDURES

The company has a set of policies and procedures that govern its activities in different areas, always in pursuit of operational excellence.

- [Code of Ethics](#)
- [ESG Policy](#)
- [Anti-corruption Policy](#)
- [Anti-money laundering and countering the financing of terrorism manual.](#)
- [Contracting and third-party relationship and negotiation policy](#)
- [Employee development policy](#)
- [Diversity policy](#)

- [Occupational Health and Safety Policy](#)
- [Action protocol against harassment in the workplace](#)
- [Quality Policy](#)
- [Conflict of interest management policy](#)
- [Non-payment policy](#)
- [Privacy Policy](#)
- [IT security policy and use of devices](#)
- [Use of creations and distinctive signs of third parties policy](#)
- [Relation with regulators and public bodies policy](#)
- [Selection and appointment of Auditors policy](#)
- [Tax management and communication with tax authorities policy](#)
- [Communication policy and contacts with shareholders, institutional investors and proxy advisors](#)

The Regulatory Compliance Programme establishes principles, procedures, and tools for managing the company's potential legal obligations and mitigating the risk of non-compliance. The organisation has also analysed possible criminal risks linked to the company's activity.





The [Code of Ethics](#), updated by the Board of Directors in March 2022, contains the values that inspire the company to achieve its objectives and behavioural guidelines. Any breach of the code is considered serious misconduct that could lead to disciplinary measures. The Code also defines the company's ethical principles:

- 01 Zero tolerance for corruption**  
We do not tolerate corruption. Holaluz, true to its values, is a lawful and impeccably managed business.
- 02 Compliance with standards**  
We do not engage in activities that breach legal standards or our code of conduct. Holaluz does not work with third parties that breach ethical rules or practices.
- 03 Integrity**  
We tolerate no fraudulent, discriminatory, abusive, offensive or unfair conduct within the company, our decisions, or our relationships with clients, suppliers or third parties.
- 04 Diligence**  
Holaluz exercises due diligence in its daily work. All Holaluz members and partners are expected to exercise caution and professionalism in the performance of their duties.
- 05 Loyalty and confidentiality**  
Holaluz ensures confidentiality and responsible use of information within the company. Holaluz members must keep all facts and information in their possession in the strictest confidentiality.

To ensure that any behaviour infringing these principles or the law is detected, prevented, processed and corrected, the company has an **Alerts channel** ([alertas@holaluz.com](mailto:alertas@holaluz.com)) that guarantees confidential communications and protects the informant. There is an **Alerts Channel Policy** that governs the use of this channel.





The **Criminal Prevention Model** governs regulatory compliance and criminal prevention. Before drafting this document, the company analysed the potential criminal risks and then designed and adopted a criminal prevention model suitable for its activity and size. It is managed by the Compliance Officer and the Compliance Committee.

Holaluz has never engaged in anti-competitive practices.

Regarding public policy and its relationship with sector organisations, several regulatory changes have been proposed to encourage competition and empower consumers. To manage these aspects, Holaluz has:

- [Anti-corruption Policy](#) that provides behavioural guidelines for its team, collaborators and third parties, and establishes control and oversight mechanisms to manage these.
- [Corporate Policy for managing conflicts of interest](#) guarantees that decisions are made objectively and impartially, prioritising the organisation's interests over the personal interests of decision-makers.
- [Relation with regulators and public bodies policy](#) establishes the principles governing the company's actions in this area.
- [Auditor selection and appointment policy](#). It ensures that auditors are independent and have the technical skill needed to undertake the task responsibly and according to the applicable regulations.

Due to its activity and business relationships, Holaluz is required to comply with anti-money laundering and terrorism financing regulations. To this end, it has an Anti-money laundering and terrorism financing manual; the contents of which are updated periodically.

Holaluz includes the Code of Ethics, [Anti-money laundering and terrorism financing manual](#) training and other anti-corruption policies and procedures, as well as others specific to each area of specialisation, to provide information and raise awareness in its **periodic training plan**.

In terms of tax, the Holaluz [Tax Management and communication with tax authorities' policy](#) establishes principles of integrity, prudence, and transparency as a guide to the management system, oversight, and compliance with the applicable law.

## HUMAN RIGHTS

Holaluz is committed to the protection and promotion of human rights established in the ESG Policy and aligned with the Ten Principles of the United Nations Global Compact Initiative. The company received no complaints regarding breaches of human rights during the period reported.

Some rules of conduct in the [Code of Ethics](#) refer directly to human rights, such as **freedom of association, non-discrimination, compliance with regulations, integrity, due diligence**, etc., while others underscore the commitment.

In 2022, the company carried out a **human rights evaluation** to identify the main impacts of the company based on the OECD guide to due diligence for responsible business conduct.



To underscore its commitment, Holaluz plans to develop new policies and procedures on forced and compulsory labour, abolition of child labour, and compliance with the provisions of the core conventions of the International Labour Organisation (ILO).









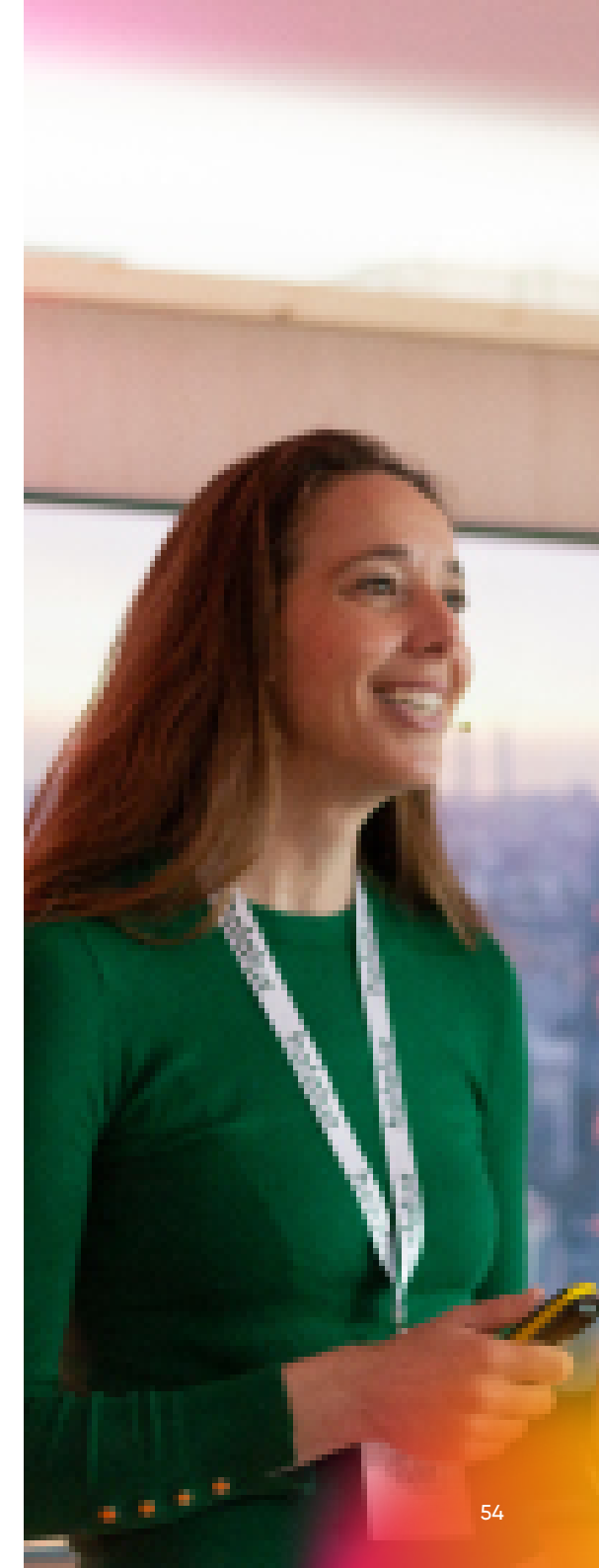
# Memberships and associations

**Proactive participation in sectoral forums and associations** that promote the renewables sector is crucial to contribute to sustainable development (specifically SDG 17: Partnerships for the Goals). Participation in such organisations increases the company's commitment to sustainability, and its ability to interact with major agents of change that generate shared value for the company and its environment, to learn and share good practices, and strengthen relations with stakeholders.

| Organisation   | Description  | Type of membership   |
|--|--|--|
|  <p><b>UNEF</b><br/>Unión Española Fotovoltaica</p> | <p>The Spanish Photovoltaic Union (UNEF) is the main association of solar photovoltaic companies in Spain. With over 750 members, it is main national sector meeting point and networking lobby association.</p>   | <p>Vice-presidency. Actively strengthening renewable energies and combating the sun tax.</p> |
|  <p><b>SolarPower Europe</b></p>                  | <p>Link between policymakers and the solar PV value chain. Its mission is to ensure that solar energy is Europe's main source of energy by 2030, leading members to make solar power the nucleus of the energy system to achieve climate neutrality in the EU before 2050.</p> | <p>Participation as a member</p>   |



| Organisation  | Description   | Type of membership   |
|---|---|--|
|    | <p>Organisation of more than 550 companies in key digital economy sectors, united by a common goal: to create an optimal environment for the development and growth of the digital economy in Spain and Europe. This will enable the creation of a more open, competitive, sustainable society, with a focus on digital ethics.</p> | <p>Participation in testing of algorithmic transparency certificates for companies.</p>  |
|    | <p>Created by the European Commission and directed by EIT InnoEnergy, the European Solar PV Industry Alliance facilitates the expansion driven by the resilient industrial solar value chain innovation in the EU, particularly in the photovoltaic manufacturing sector.</p>   | <p>Holaluz has joined the alliance to cooperate in the development of a collaborative framework between manufacturers and buyers, which responds to the growing need for solar products.</p> |
|    | <p>National association covering the entire sector value chain with the purpose of representing the interests of sector companies before national and European public administrations.</p>  | <p>Participation as a member</p>   |
|  | <p>Platform for high-growth technology-based companies in Spain aimed at promoting the development of technology and digital-based productive tissue that will reach 40% of our country's GDP by 2030.</p>  | <p>Participation as a member</p>   |







**05**  
**Commitment to  
the environment**



# Energy transition

The energy transition is crucial to address the current climate emergency and the available solutions come at a high cost for consumers.

Holaluz has a solution for the entire system: **The Rooftop Revolution.**

Holaluz proposes a structural change: transform the current energy generation model (centralised and non-renewable) to a new **decarbonised model** with more weight **on the distributed generation.**



**10 million** feasible rooftops in Spain for solar panels that receive sunshine all year

**8 million** of those roofs are on detached and semi-detached houses and the rest on housing blocks, which can easily be transformed into green energy-producing roofs for everyone.



The Rooftop Revolution will enable more than **40 million** people to benefit from green energy at a tenth of the current price for the next 40 years.

<sup>18</sup> The calculation made on the estimation of the time in which the green energy generated by the solar installation has avoided the same amount of emissions that have been generated in the production of its materials as well as its assembly has been made based on the average energy generation per installation and the quantification of CO<sub>2</sub> emissions generated from the entire value chain of photovoltaic installations, which include the manufacture of equipment, commercial and installation services, transportation, waste generation and the life cycle of all installed products.



The Rooftop Revolution is good for the planet, for the electricity system and for Holaluz customers:



**The planet** customers were transformed from electricity consumers to green energy producers. Holaluz photovoltaic installations take only 3.2 years to avoid the same amount of emissions as those generated in the production of their materials and their installation<sup>18</sup>. Considering that they have a minimum useful life of 25 years, they will be avoiding the emission of greenhouse gases for at least 87% of their life.



**The electricity system** solar customers consume and produce green energy. This is **efficient (0km energy)** and allows stable prices, while encouraging energy independence.



**The customer** Holaluz is the only company that offers up to **100% savings on bills**, with a quick, simple process that does not require the customer to do anything.

Holaluz encourages responsible energy consumption and responsible production through partnerships with independent green energy producers and solar contracts under management. **Since it was founded in 2010, the company has prevented the emission of more than 2.3 million tons of CO<sub>2</sub>e.**

The company also guarantees the promise of 100% green energy through renewable origin certificates, which ensure that all the electricity we supply is of renewable origin (origin guarantee certified by the CNMC).

Holaluz's business model adopts the precautionary principle, as it seeks to promote green energy to reduce or avoid the negative environmental impacts of fossil fuels. The precautionary principle is also applied to its activity.

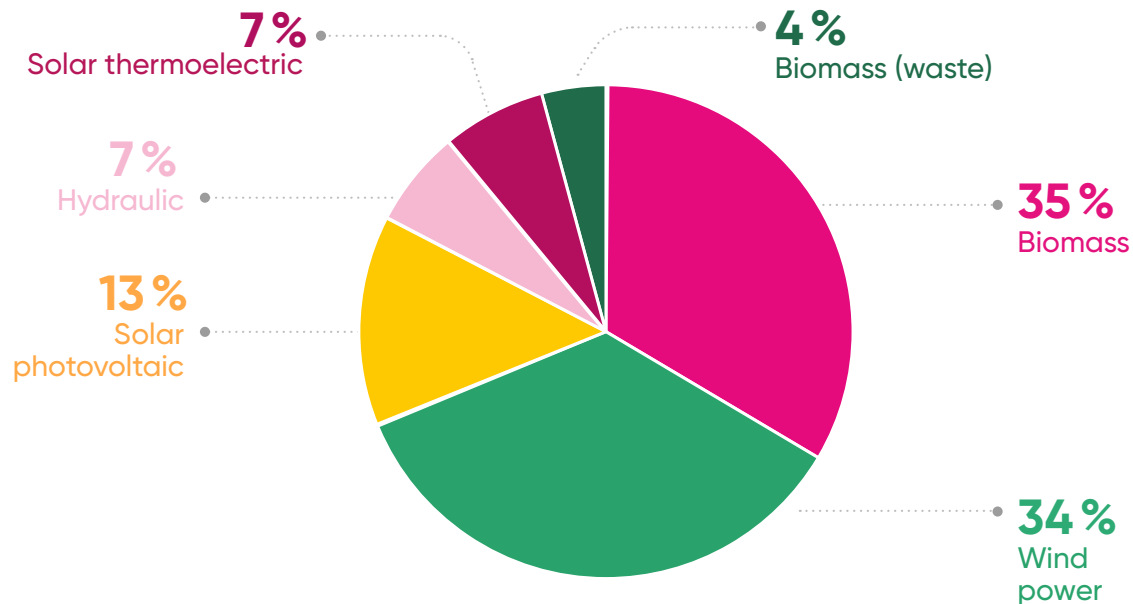
### Holaluz decomissions gas commercialisation business

The company's focus on customers and environment was also evident in Holaluz's decision to end the commercialisation of gas in October for the benefit of its customers and as a solution to the unpostponable climate emergency.

Ending the commercialisation of gas focuses the company in a definitive and unique way on The Rooftop Revolution, Holaluz's bet to make the planet move entirely thanks to green energy.

Thanks to this, Holaluz clients will save more than 10 million euros in the first quarter of 2023 alone. In addition, this decision represents a reduction in the company's greenhouse gas emissions and reinforces its commitment to decarbonisation and the objectives of the Paris Agreement and the European Green Deal.

### Guarantees of origin



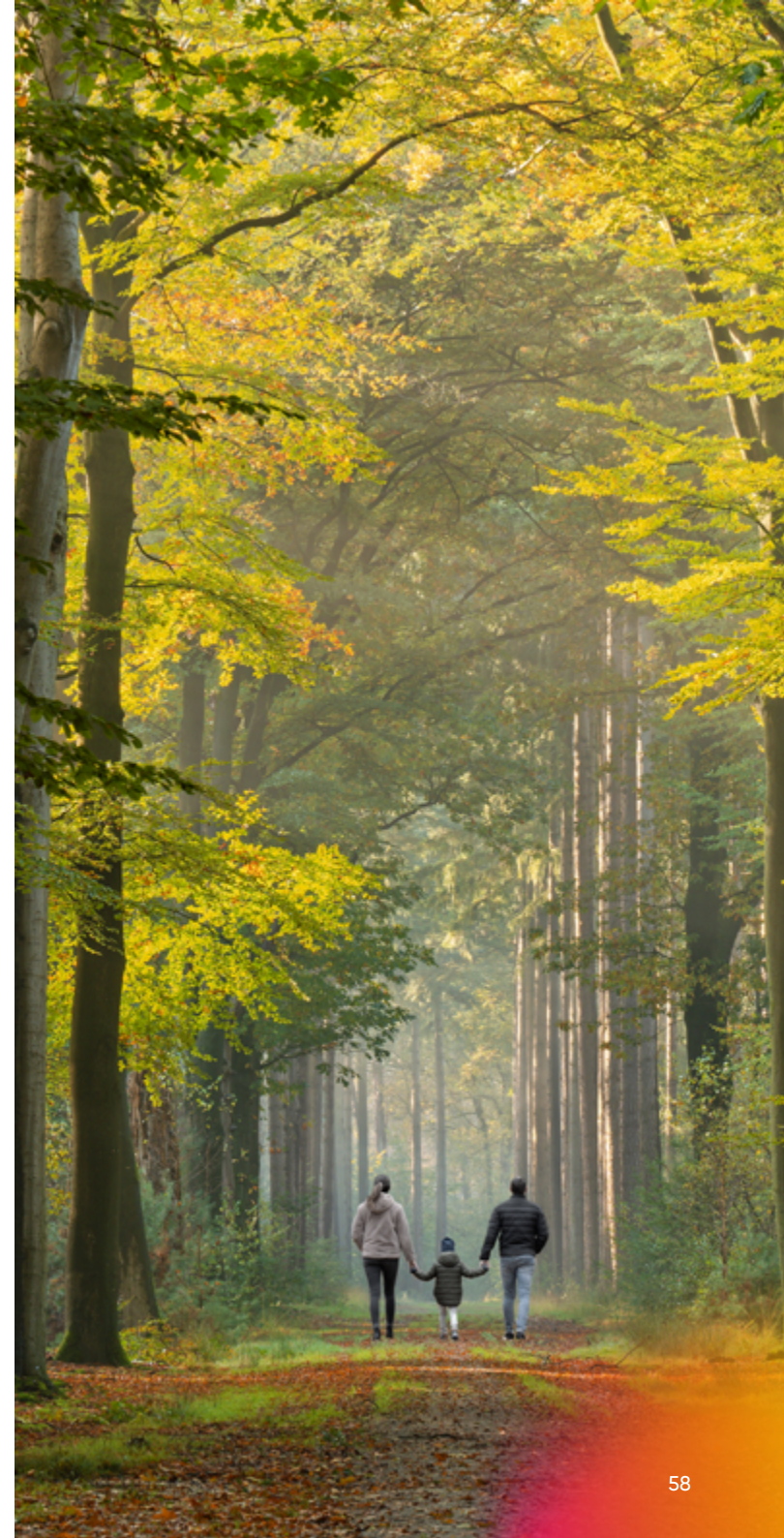


# Environmental Management

is a cross-cutting aspect that permeates throughout all its teams. Sensitization and communication of the environmental commitment are ingrained in the company's DNA and materialize in its [ESG Policy](#), where the business strategy seeks to maximize the positive impact on the environment and mitigate any negative impacts that may arise from the company's own operations.

The company's Solar First approach has brought about a significant change in Holaluz's operations in 2022, as logistics warehouses, a fleet of vehicles for installation and sales teams, as well as different materials for solar installations, have been acquired as part of the company's business development.

With the opening of logistics warehouses, Holaluz's responsibility has expanded to ensure good management of the resources used, waste generated, and reduction of carbon emissions associated with its activities, as they are the most significant factors of its environmental impact. For this reason, the company has begun working in 2022 on the implementation of an environmental management system based on ISO 14001.





## CIRCULAR ECONOMY, WASTE PREVENTION AND MANAGEMENT

As established in its **Waste Management Policy**, the company prevents and manages waste, encouraging reuse and recycling in solar installations and the installation process.

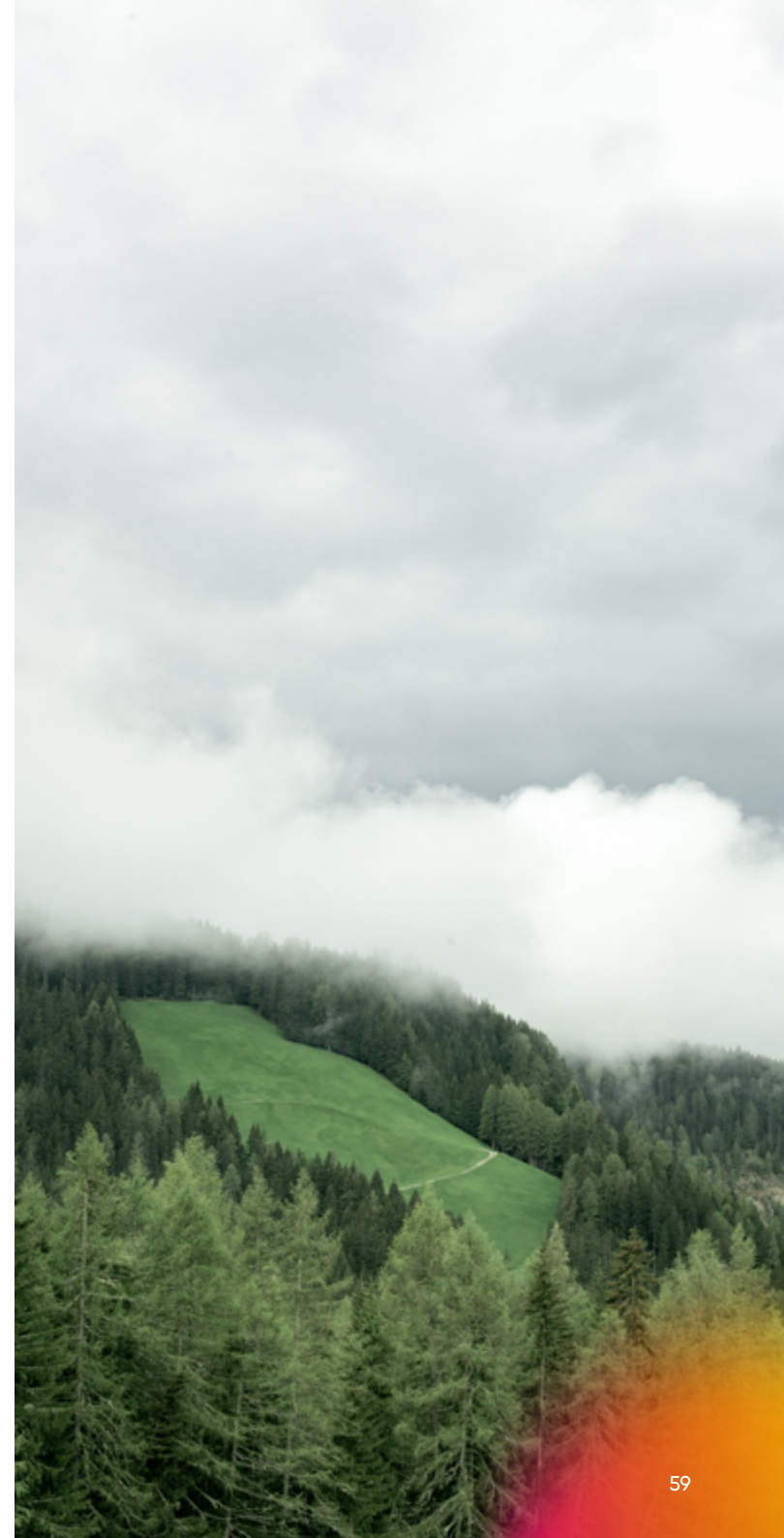
In 2021, Holaluz signed a solar panel recycling collaboration agreement with **La Hormiga Verde**. This special employment centre manages “Waste from Electrical and Electronic Equipment” (WEEE) from collection to reuse. The organisation now reuses 100% of waste from electronic equipment and solar panels generated by Holaluz’s activity.



In 2020 the company signed a collaboration agreement with **Fundació Banc de Recursos** to give a second life to computer equipment (screens, keyboards, mice, laptops and towers) that have been amortised, thereby extending their useful life.



Holaluz avoids producing any waste in its offices by using selective waste containers for paper, plastic and glass in offices. Its water fountains are connected to water supplies that do not generate plastic waste, and all single use plastics have been eliminated through collaboration agreements with food suppliers that use biodegradable packaging.



## WASTE GENERATION

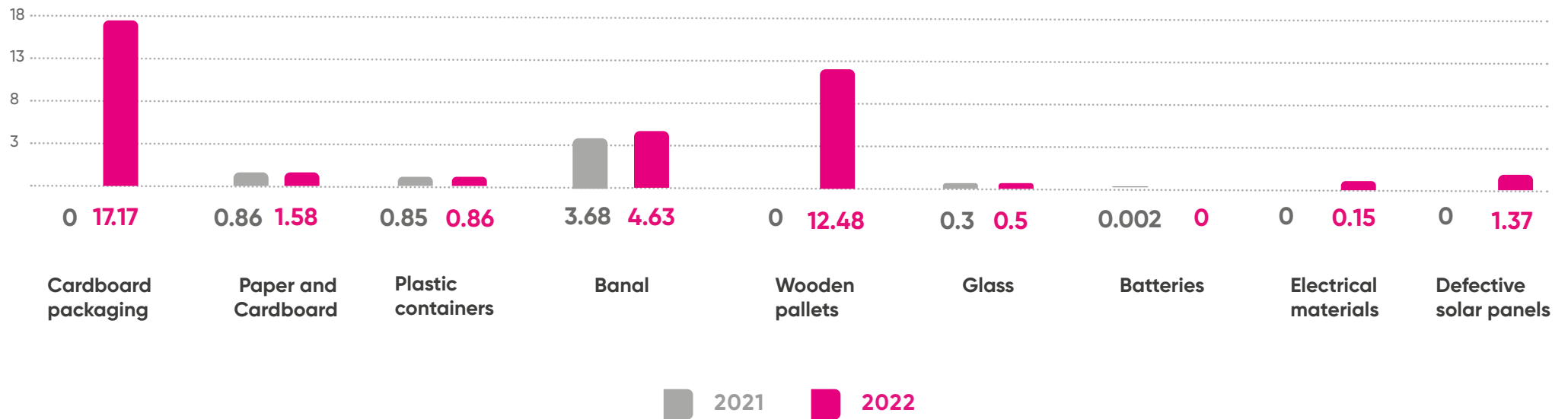
All waste produced in the warehouse, mainly packaging from pallets, cardboard packaging, and plastic labels, is regularly prepared and sent to waste management centres. **A total of 88% of all waste generated was destined for reuse and recycling in 2022.**

During the period reported, Holaluz estimated the annual waste generated, which is displayed in the graph below. The company does not produce hazardous waste.

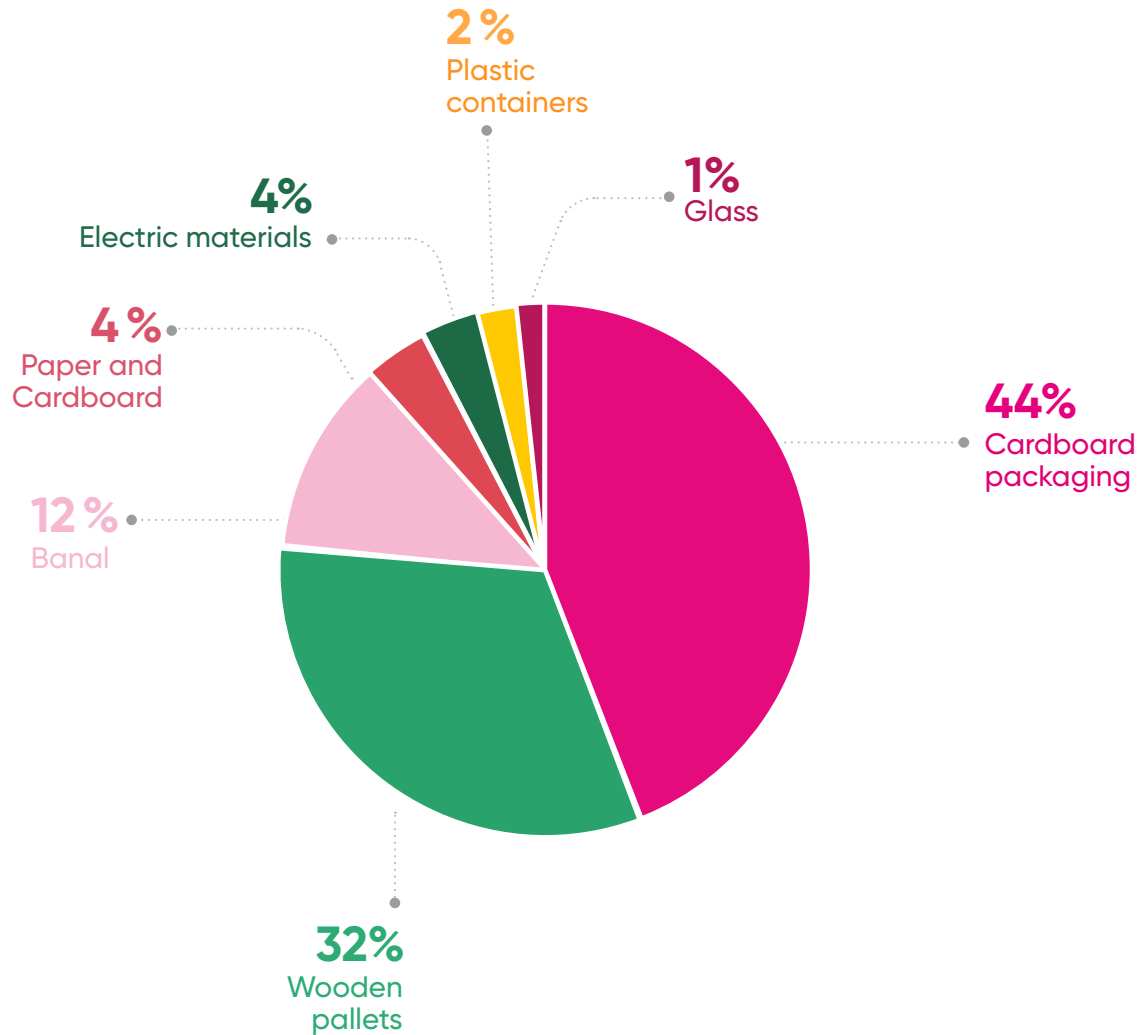


### Waste generation

tones



### Distribution of waste generation 2022

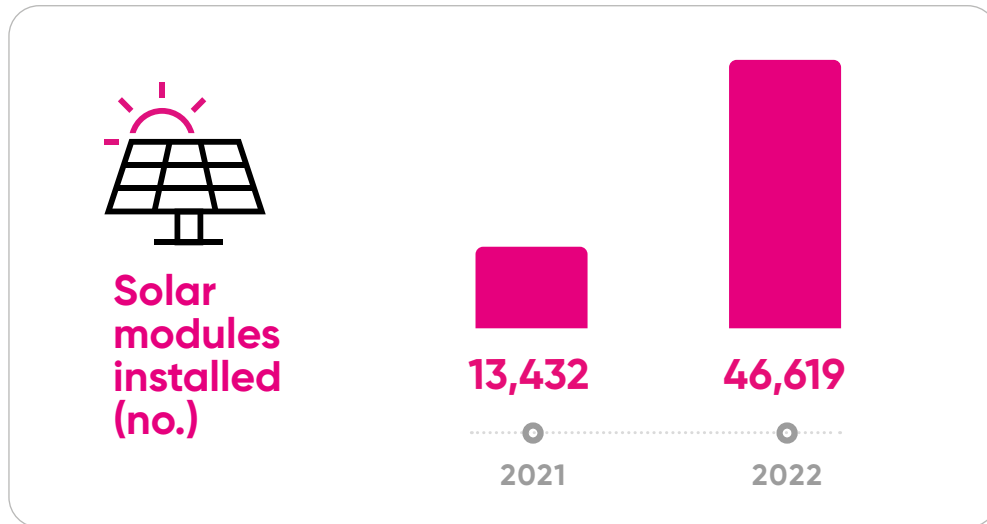




## RESPONSIBLE USE OF RESOURCES

### Raw materials

The most important raw material for the company is the photovoltaic installations material. During this year, the number of installations carried out has multiplied by more than 3. The importance of these installations has led to the implementation of measures to avoid the negative impacts derived from them.



For more specific information about the company's use of materials, see **Annex I - Indicators - i. Environment.**

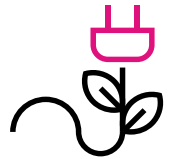
In 2022, Holaluz introduced measures to reduce raw materials consumption, including:

- Bulk purchases of stock and stockpiling equipment used in solar installations to reduce the environmental impact associated with the transport of goods.
- Raising awareness of the responsible use of office resources.
- Sending invoices to customers by email instead of by post saved 145 tonnes of CO<sub>2</sub> and 3,018 tonnes of water during the year.

## Energy consumption

The energy consumption in Holaluz's operations includes the facilities where the company's various activities are carried out, as well as the fleet of vehicles, which is an active and fundamental part of the services it provides.

The offices and warehouses are powered entirely by **100% green electricity** commercialised by the company.



Electricity consumption  
**259,651 kWh**  
**100% green energy**



Fuel consumption  
**91,587**  
**diesel litres**

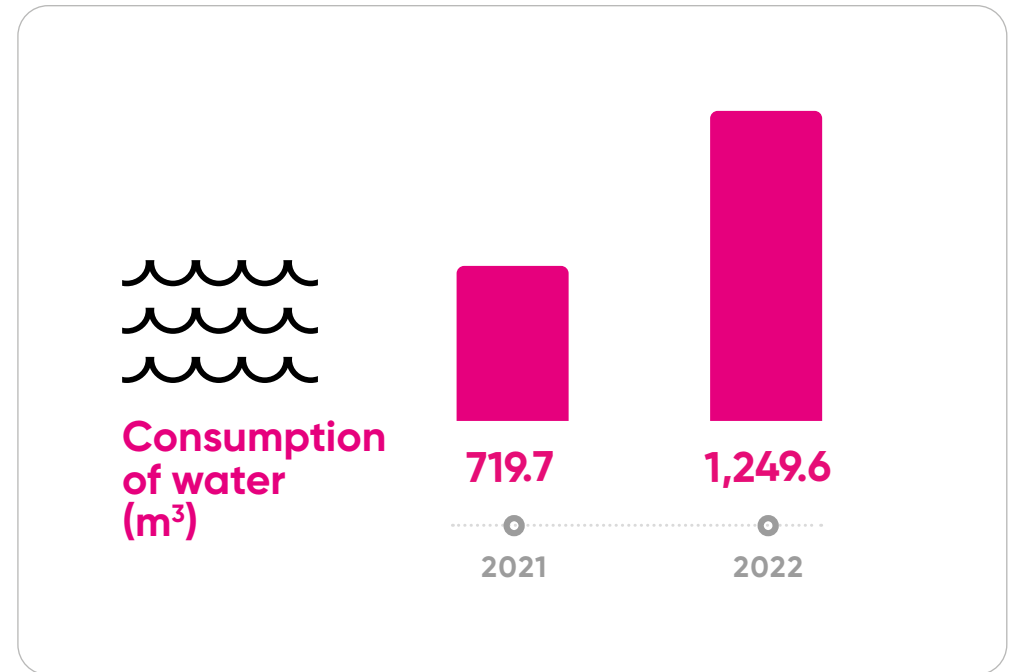
As regards energy efficiency measures at Holaluz sites, these are limited, since all these properties are leased. However, the headquarters - where most activity takes place - has LED lighting and undergoes regular energy efficiency audits that include energy, technical and economic feasibility analyses of energy saving measures.





## Water

Holaluz uses water mainly for sanitary purposes on its premises (offices and warehouses). All water supplied to its premises comes from the mains and is discharged into the municipal sewers.



According to the Aqueduct Water Risk Atlas, most of this water is obtained from areas classified as medium risk.



## CLIMATE CHANGE

Holaluz's commitment to decarbonising its activities means the company needs to identify and use resources that reduce its emissions. Therefore, Holaluz monitors and publishes the CO<sub>2</sub> emissions it generates.

In 2022, Holaluz has implemented various initiatives:



Has joined the United Nations **Business Ambition for 1.5°C campaign** and it is currently working on defining **science-based emission reduction targets according to the Science Based Target Initiative (SBTI)**. The aim is to achieve net zero emissions well before the goals set by the European Union.



Has participated in the United Nations **Climate Ambition Accelerator** programme, which aims to increase company's climate action, fulfilling significant commitments to reduce emissions on larger scales.



Has used sustainable software and has implemented Thoughtworks' **Cloud Carbon Footprint tool** to measure the carbon emissions derived from the Cloud and to take measures to reduce them. In this context, it has identified potential emissions savings of approximately 20% by redesigning the cloud use.



## CARBON FOOTPRINT

In 2022, Holaluz calculated its CO<sub>2</sub> emissions following the GHG Protocol of Greenhouse Gases methodology for management and reporting purposes. The scope and emissions identified across the company's business value chain were as follows:

- **Scope 1:** Measurement of vehicle emissions and fuel consumption.
- **Scope 2:** Emissions from use of electricity. All electricity consumption is measured according to market-based and location-based methodologies <sup>19</sup>.
- **Scope 3:** Purchased goods, services and capital goods, fuel and energy activities, upstream transport and distribution, waste generation, business travel, employee commuting, downstream transport and distribution, use of traded products.

Emissions by scope are shown below:

| 2022 (tCO <sub>2</sub> e) | 2021 <sup>20</sup> (tCO <sub>2</sub> e) | Scope                         |
|---------------------------|---|-------------------------------|
| 335.12                    | 118.99                                  | Scope 1                       |
| 0.00                      | 0.00                                    | Scope 2 (market based)        |
| 67.25                     | 20.51                                   | Scope 2 (location based)      |
| 74,785.13                 | 71,828.73                               | Scope 3                       |
| <b>75,120.25</b>          | <b>71,947.72</b>                        | <b>Total(market based)</b>    |
| <b>75,187.50</b>          | <b>71,968.23</b>                        | <b>Total (location based)</b> |



To calculate emissions, the total consumption within each scope was multiplied by its corresponding GGE emission factor.

The main emission factors used to calculate the equivalent Scope 1, 2 and 3 CO<sub>2</sub> emissions are those proposed by the Department for Environment, Food and Rural Affairs (DEFRA) and obtained from the national calculators provided by the Ministry for Ecological Transition and Demographic Challenge (MITECO) and the Catalan Office for Climate Change.

<sup>19</sup> All electricity consumption is measured using two methodologies: market-based and location-based. The location-based methodology reflects the average emissions intensity of the grids where the energy consumption takes place (mainly using average grid emission factor data) and the market-based methodology reflects the emissions of the electricity that companies have purposely chosen (or their lack of choice).

<sup>20</sup> The emissions generated in the period 2021 have been recalculated considering the total scope of the organisation.



## 05. Commitment to the environment | Environmental Management

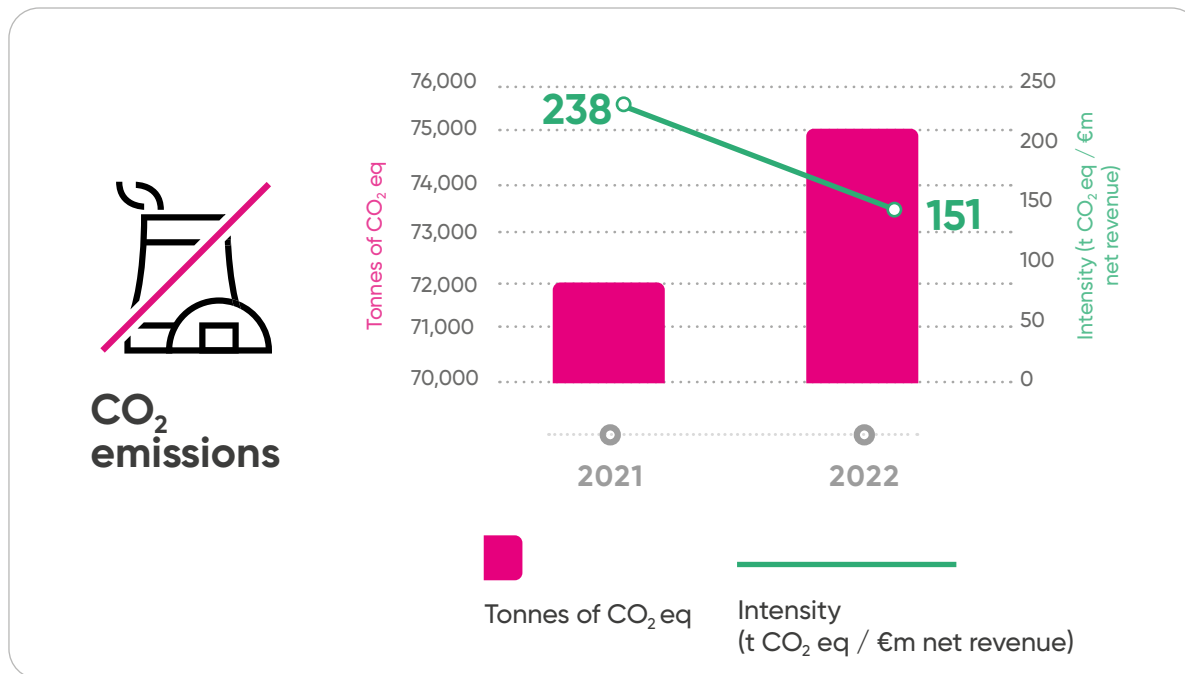
The company **certifies its carbon footprint calculation according to the ISO 14064:2018** framework across all three scopes (1+2+3). This is presented at the end of this report.



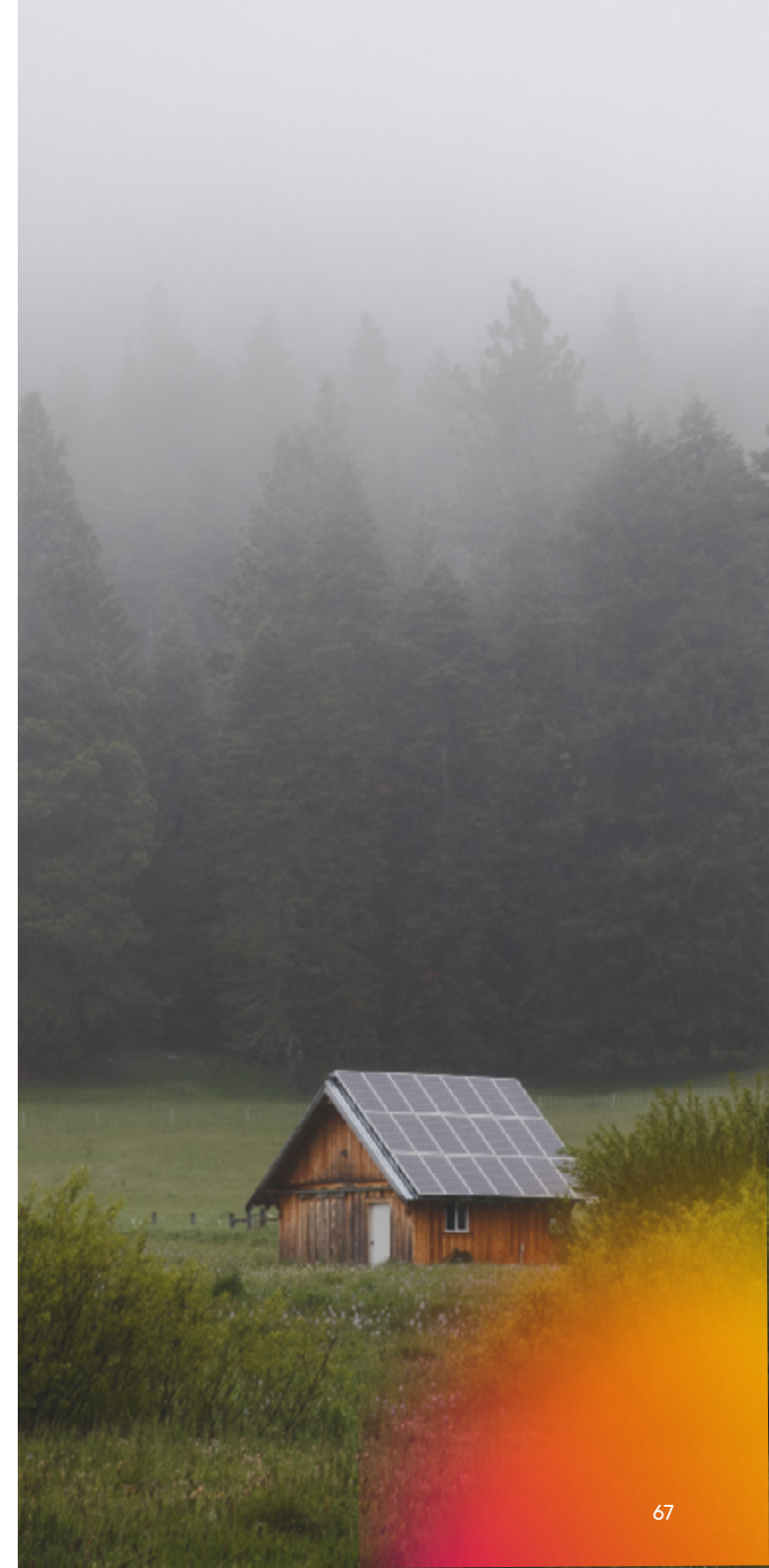
The company's **GHG emissions intensity** has been **reduced by 37%<sup>21</sup>** in 2022 compared to the previous year.

At the end of this report, Holaluz has voluntarily registered its 2022 Carbon Footprint and emissions reduction plan in the **Carbon Footprint Registry of the Ministry for Ecological Transition and the Demographic Challenge (MITECO)**.

Finally, Holaluz has offset more than 80% of its GHG emissions through the acquisition of carbon credits from projects that promote energy transition, specifically in two projects located in China and one in Pakistan, all three linked to renewable energy generation.



<sup>21</sup> The revenue considered for the calculation of emissions intensity does not include the representation business line, which is affected by the volatility of electricity prices and has no impact on the carbon footprint.







**06**  
**Commitment**  
**to people**

# Holaluz as a workplace

With the conviction that companies are the people who make them up, Holaluz has created an ecosystem where team members can grow in an integral way, being the best version of themselves.

The holistic growth of the team is achieved with a business model based on two pillars: flexibility and autonomy. This enables employees to balance their work and family lives. Examples of this are working-by-objectives methodology and flexible hours.

This system promotes equity at all decision-making levels. So far, technology and solar teams have been dominated by men, however, the company is introducing specific measures to promote parity and meritocracy quotas.

The company has set up a Purpose-Driven Organisation with dedicated OKRs (Objectives and Key Results) whose mission is to achieve goals with a high impact on the business.

**Their main objectives are:**

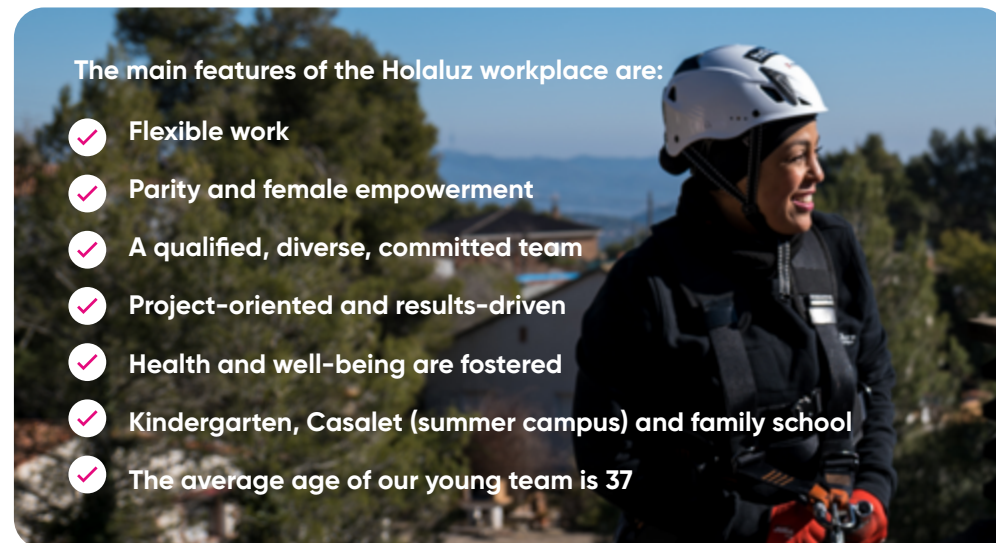
- ✓ Work on most important nationwide, high-impact initiatives.
- ✓ Unite company teams to streamline cross-cutting projects.
- ✓ Make middle management responsible for business sub-OKRs and authorise them to lead the necessary initiatives to achieve them.
- ✓ Achieve the company's targets and results.

Holaluz has an **Employee Development Policy** with measures that define, design, and disseminate a management model with two main goals. Firstly, to attract, promote and retain talent, and, secondly, to encourage personal and professional growth of everyone in Holaluz. This includes:

- 01 Attracting talent with purpose and vision**  
talented recruits join a company with a sustainable purpose and vision. Holaluz is the first European Electricity company to gain the B Corp certificate (recognition of how we maximise the positive impact on employees, the community, and the environment).
- 02 Retain talent through culture**  
ours is a results-based approach that keeps everyone motivated in the pursuit of achievements.
- 03 Achieve goals through teamwork**  
effective teamwork is a sign of success. It requires supporting and growing together. Our individual, group and company objectives ensure balanced, sustainable remuneration. Group and business objectives are shared to promote teamwork.

The main features of the Holaluz workplace are:

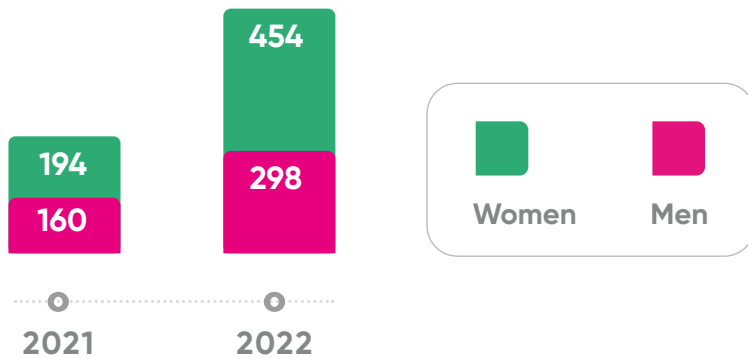
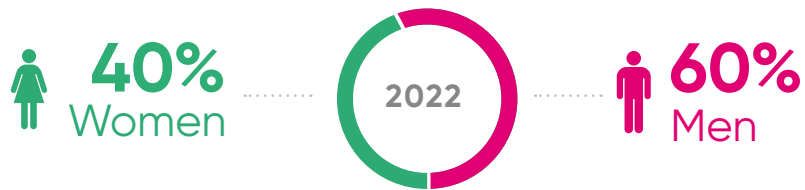
- ✓ Flexible work
- ✓ Parity and female empowerment
- ✓ A qualified, diverse, committed team
- ✓ Project-oriented and results-driven
- ✓ Health and well-being are fostered
- ✓ Kindergarten, Casalet (summer campus) and family school
- ✓ The average age of our young team is 37



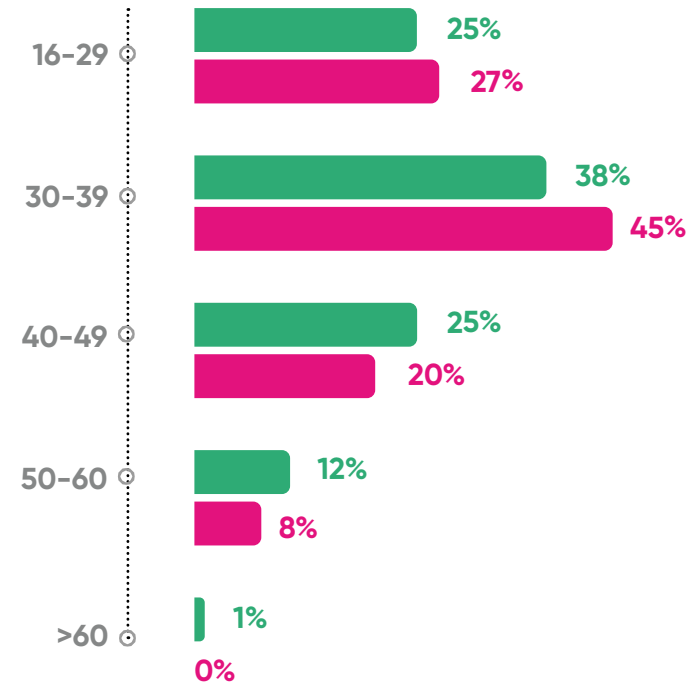
## THE HOLALUZ TEAM IN NUMBERS



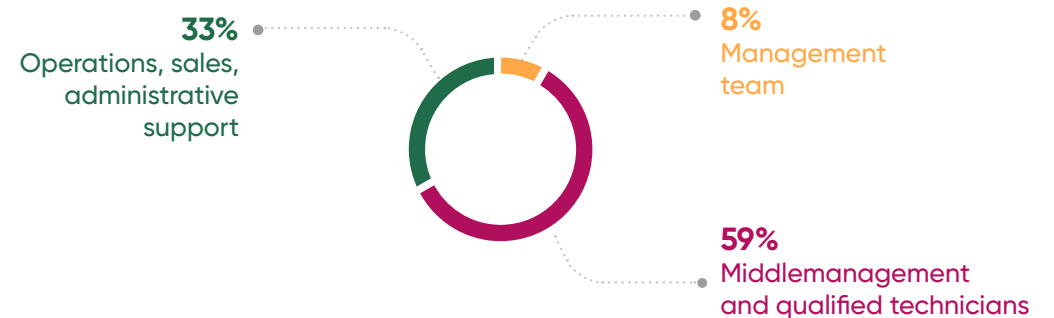
### Employees by gender



### Employees by age



### Employees by professional category



<sup>23</sup>The entire team is located in Spain and the management team equivalent to the Management Committee has also been recruited locally (Spain).



## FULL-TIME STAFF



Permanent employees

98%

Management team

95%

Middle management and qualified technicians

94%

Operations, sales, administrative support



Full-time staff

100%

Management team

99%

Middle management and qualified technicians

96%

Operations, sales, administrative support

## COMPENSATION

Holaluz offers a fair compensation package. Employees receive a **fixed salary** based on impact, merit and promotions, and a **variable bonus based on objectives**. Targets are set at a team, company, or individual level, which ensures balanced and sustainable variable pay. The objectives of most of the company teams (apart from the sales team) are shared across the company, meaning everyone works together.

In addition, Holaluz offers the team the option **to buy shares of the company** through salary deductions, salary deductions. It also has a **flexible compensation plan** that allows the team to receive a portion of their annual salary in goods and services, adjusted for individual personal needs of each, allowing them to take advantage of tax benefits. Significantly, all bonuses and objectives are directly linked to the growth of the business, and therefore to the promotion of energy transition and fight against climate change.

## Well-being and work-life balance

At Holaluz, the **well-being of the team** is essential. A serene workplace where everyone is listened to encourages a feeling of belonging and strengthens engagement. With this objective in mind, several policies and procedures have been implemented, including the following **benefits**:

- Low-cost **private medical** insurance (50% covered by Holaluz).
- Subscription to **yoga and crossfit** classes in the office with reduced fees.
- **Flexible remuneration** programme.
- **Healthy food and organic fruit** every day in the office, which meet Fairtrade guidelines.
- Option to attend **coaching sessions** aimed at improving their skills and managing issues that could impact the emotional and mental wellbeing
- **Collaboration with Cooltra** through its Business Sharing for Employees service - a competitive and safe option for sustainable mobility that offers motorcycles and e-bikes with numerous benefits and low flat rates.

Holaluz is also the first electric company to obtain the **Baby Friendly Company** certification.

This day-care programme helps parents to combine personal and working commitments and offers childcare services and orientation sessions. Holaluz was also one of the first companies to offer optional paid parental leave.



## 06. Commitment to people | Well-being and work-life balance

The company is committed to **balancing personal, family and work life**, promoting work by objectives and time flexibility. This encourages team co-responsibility and autonomy.

The company is organised in coordination with its teams to achieve the objectives. However, some professional categories such as installers and solar experts (commercial) have hourly guidelines.

### ABSENTEEISM<sup>25</sup>

#### 2022

|   | Women  | Men    | Total  |
|---|--------|--------|--------|
| Hours of absence for common contingencies | 11,112 | 19,424 | 30,536 |
| Absenteeism rate(%)                       | 2.6    | 2.8    | 2.7    |

#### 2021<sup>26</sup>

|   |       |     |       |
|---|-------|-----|-------|
| Hours of absence for common contingencies | 8,648 | 577 | 9,225 |
| Absenteeism rate (%) <sup>27</sup>        | 3.5   | 0.2 | 1.9   |

The increase in total hours of absenteeism compared to the previous year is due to an increase in the workforce and the increase in the scope of information .

<sup>25</sup> Absenteeism rate: (hours of absenteeism due to common contingencies/total hours worked)\*100

<sup>26</sup> Does not include the company Katae Energia, SL.

<sup>27</sup> The absence rate has been recalculated with the average hours worked by employees according to the company to which they belong.





Holaluz promotes a safe and respectful working environment among its team members. In June, the company introduced a [Occupational Health and Safety Policy](#) based on the fundamental principles of Health and Safety at Work, which are essential for fostering a culture of occupational risk prevention in companies.

The Prevention Services prepare an annual report outlining all actions carried out to guarantee workers' health and safety. These actions include risk assessments, emergency plans, training programmes and the development of risk information sheets.

A highlight of the year was The Road Safety Awareness campaign, which included a driving simulator practice and interactive experience with distortion goggles to simulate being under the influence of alcohol or drugs.



## ACCIDENTS<sup>28</sup>

| 2022                              | Women | Men   | Total |
|-----------------------------------|-------|-------|-------|
| Work accidents with leave (Cases) | 0     | 11    | 11    |
| Work accidents with leave (Hours) | 0     | 1,520 | 1,520 |
| Accident frequency rate           | 0     | 15.59 | 9.72  |
| Accident severity rate            | 0     | 0.27  | 0.17  |

| 2021                              | Women | Men | Total |
|-----------------------------------|-------|-----|-------|
| Work accidents with leave (Cases) | 0     | 0   | 0(*)  |
| Work accidents with leave (Hours) | 0     | 0   | 0     |
| Accident Frequency rate           | 0     | 0   | 0     |
| Accident severity rate            | 0     | 0   | 0     |

<sup>28</sup> Frequency rate: number of work accidents with sick leave by gender/total hours worked by gender \* 100.000. Severity rate: days lost due to work-related accidents by gender \* 1,000/total hours worked by gender.

(\*)The number of work accidents with leave has been corrected for 2021 as the only work accident did not result in any time off work.

## Participation

Holaluz is committed to maintaining high **team satisfaction** and carries out weekly enquiries focused on distinct aspects of the daily work routine through the Officevibe tool. Some of the metrics evaluated are relationship with managers, Holaluz ambassadors, feedback, happiness, satisfaction, personal growth, recognition, relationship with colleagues, well-being, and alignment. Also, the company gathers information on an indicator, called eNPS<sup>29</sup> (employee net promoter score), on the likelihood of staff members to recommend Holaluz. The company's current average eNPS over the reporting period from this survey is 29.

The company actively encourages open communication and team members' participation. In this context, the following events, which take place regularly, allow the team to learn and #HaveFun together.

- **All Hands**  
The entire Holaluz team meets to report on the company's performance and upcoming projects.
- **HolaTalks**  
External and internal speakers are invited to our offices in a hybrid event to share their knowledge and experiences, based around the company values.
  - **27 January. The era of impact: ESG at the heart of corporate strategies. The internal Corporate Communications and Impact team** explained how the company integrates ESG (Environmental, Social, Governance) criteria into its daily operations to promote positive impact on society and generating shared value for all its stakeholders.

<sup>29</sup> The eNPS or Employee Net Promoter Score is a tool that allows to know the degree of loyalty of employees with their company. It is a comprehensive survey among the workforce, who must answer the following question: "Would you recommend a friend to work at your company?". An Employee Promoter score above +10 is considered a good eNPS. The figures generally found are between -10 and +10.

- **4 May. The path to trust, personal skills to communicate better. Ferran Ramon-Cortés**, writer, and communication expert, explained the four basic pillars of interpersonal communication and its associated skills. He encouraged reflection on how to develop these skills, with the aim of achieving communication that connects us with others and fosters cooperative relationships.
- **27 October. Creating impact: turning challenges into opportunities. Marga de Rossello Carril**, Sustainability and Climate Change Partner of PwC, explained how companies can participate in addressing major challenges facing humanity, while generating positive Economic Impact.



- **Team Buildings**  
Group experiences that are out of the ordinary to live the values, share different work sessions and the spirit of team.
- **Coffee & tea roulettes**  
Meetings (in Spanish and English, respectively) where the participants meet, in the office or virtually, to have a coffee and get to know the rest of the members, as well as their teams, their roles and the work they do.

## Development and growth

Holaluz strives to create a working environment where employees can reach their full potential. To do this, the company has an **Employee Development Policy** that establishes measures and processes to attract, motivate and retain talent, as well as to boost the personal and professional growth of the entire team.

It also provides employees with a **career plan and future projection** and offers a personalised onboarding experience for new recruits. Additionally, Holaluz's culture, based on values, beliefs and practices, guides its talent and performance management model through self-assessment sessions and evaluation meetings. Here, the **70/20/10 model** is promoted through the following initiatives:

### SHAKE & PLAY

A talent management programme led by People applied to the company and the entire company to make progress in areas such as identifying employees in the nine boxes grid, work on tailored actions such as individual development and improvement plans, and support managers from the *Human Resources Business Partner* role with calibration meetings to ensure consistent, coherent assessments.





## LEARNING & DEVELOPMENT GUIDELINES

Define, detail, and publicly share training initiatives available to the team via Notion<sup>30</sup>

- **Holaluz University**, a free virtual learning centre, created so all team members can train to be experts in all relevant areas of Holaluz.
- **Individual Training**. All employees can request financing from the company for specific training.
- **Tailored training by teams**. When there is a specific need affecting an entire team or group of people from different teams, the People area coordinates the learning solution.
- **Spanish, English and Catalan language classes** are voluntary and free for the entire team.
- **Mentoring pilot programme** to develop leadership skills and disseminate good practices, where both mentors and mentees are part of the team.

<sup>30</sup> Holaluz platform where you can find comprehensive information about the organisation.

- **Library and reading area** with free materials shared by employees and managed through an app for a streamlined, digital experience.
- **Holaluz Academy**. In 2022 Holaluz launched the Holaluz Academy with the aim of providing the company (and the sector in general) with qualified and competitive professionals to meet the current high demand for professionals in the photovoltaic sector and to be able to continue executing The Rooftop Revolution.

Holaluz offers specialised training in photovoltaics through professionals with extensive experience in the sector, providing high quality standards and always seeking maximum excellence. With this, it wants to establish training guidelines for a sector lacking in regulated studies.

Holaluz also has the **Talent Nest Programme**, a set of learning programmes for youngsters aged between 16 to 22 whose family members are part of the Holaluz team. The initiative offers them first-hand work experience and allows them to get to know the different teams.



# Equity and diversity

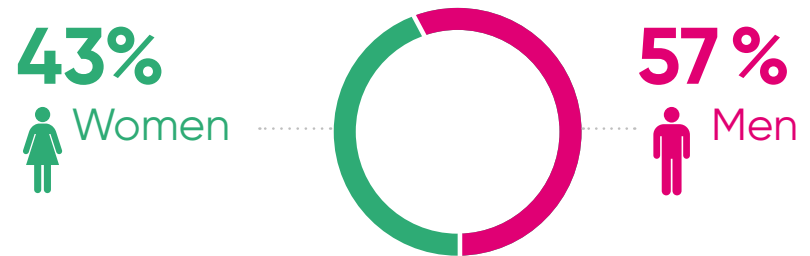
Holaluz is **truly committed to equity and diversity**. The company establishes and develops policies that promote equal treatment and opportunities between men and women, avoiding any kind of discrimination based on gender.

As a result, Holaluz has become a nearly gender-equal company at all levels of decision-making and across all teams. This achievement has been organic and is a source of pride for the company. However, in the current market, positions related to the field of technology, as well as solar experts (sales) and technical solar installation technicians, are dominated by men. Therefore, Holaluz is putting all its energy into promoting gender parity within these teams. To achieve this goal, the company has established quotas based on meritocracy and other innovative solutions such as a programme for technical staff in installations, making this the world's **first Academy for women solar installers**.

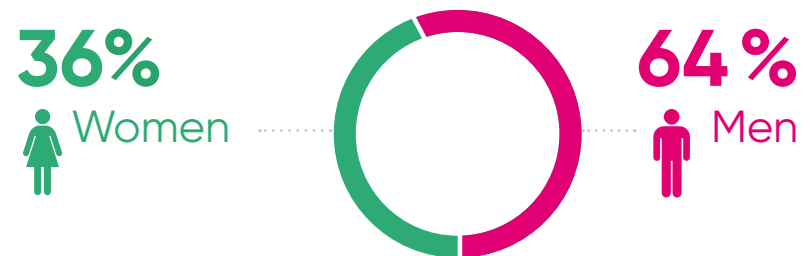
This year, the company has joined the **Women's Empowerment Principles (WEPs)**, a set of principles established by the United Nations Global Compact and UN Women. They are based on international labour and human rights standards to foster business practices that empower women.



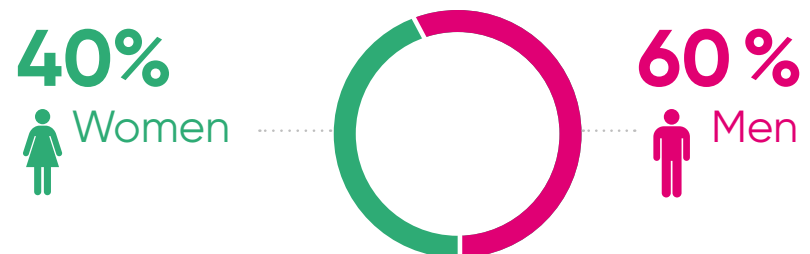
## Women on the board



## Female managers



## Women on the team





## 06. Commitment to people | **Equity and diversity**

Holaluz carries out different initiatives to achieve equity within the organisation as a strategic principle of corporate policy, some of which include:

- ✔ **Equity Committee**  
Together with the Trade Union Confederation of Workers' Commissions (CCOO) and the General Union of Workers (UGT), the Equity Committee updates the current equity plan according to the applicable regulations. It has also carried out a job assessment and created a compensation register.
- ✔ **The world's first school for female solar installers**  
The Holaluz Academy has proven to be a key factor in enhancing Holaluz value proposition to customers while leveraging operational excellence to increase financials and deliver the solar systems. The company's focus on women allowed us to create the first school for female solar installers worldwide.
- ✔ **Protocol to prevent and act against sexual harassment at work**  
It outlines how to prevent and act in the event of any sexual, moral or gender-based harassment quickly, objectively and confidentially, guaranteeing the privacy of the informant(s) or victim(s) of harassment and specifically determine the actions and internal sanctions resulting from said harassment.
- ✔ **Diversity policy**  
to ensure equal treatment and opportunities and the elimination of any discrimination based on disability, nationality, age, and gender within the company.
- ✔ **Collaboration agreement**  
with the **Aura and Estimia** foundations to promote the inclusion of people with disabilities within the company.





An aerial photograph of a dense urban landscape, likely a European city, captured during the golden hour of sunset. The buildings are tightly packed, and the sky is a mix of soft pinks and oranges. A semi-transparent gradient overlay, transitioning from pink on the left to orange on the right, is applied over the image. Centered on this gradient is the text '07 Commitment to society' in a clean, white, sans-serif font.

**07**  
**Commitment  
to society**



## Social action

**Holaluz generates shared value for society** by relying on mutual trust with its **customers**, hiring local supplier companies, and contributing to social causes. Customer satisfaction is a priority for the company, and we aim to offer the best experience, savings and solutions based on **artificial intelligence** and policies of quality and data security.

With the belief that a company can be **a tool to change the world**, Holaluz leads the transformation of the energy sector by generating shared value for both society and the planet. The company plays a key role in promoting **energy transition and the fighting against climate change**. This entails a genuine commitment to current and future generations and, as a result, in the obtention of multiple related recognitions.

Holaluz has been part of the **B Corp** movement since 2018, a movement that works to transform the system to create a fairer, more inclusive, and more regenerative economy. In 2022 the company updated its impact business model and achieved a higher score than the previous year, becoming the top-rated performer in its sector of companies with revenue over 1.5 million in Spain. The company promotes local development by hiring local suppliers, specifically **95% of the expenditure on suppliers goes to local suppliers** who have the tax headquarters in Spain.

Holaluz is also an honorary member of **Co-persona**, which promotes social transformation through a network of collaboration and support of social co-responsibility, made possible by the integration and harmonisation of different social fields (administration, communication, business, education, social initiative and health).

In 2022, Holaluz has made monetary contributions to social causes worth €165,770, a significant increase compared to the contributions made the previous year which were €75,000. Holaluz has contributed to the following foundations:

### Open arms

collaboration with an organisation that helps with the humanitarian crisis in Ukraine caused by the war.



### José Antonio Segarra Foundation

collaboration with the foundation that was created to defend and promote the employment of people with intellectual disabilities and special difficulties as a means for their social integration throughout the Spanish territory.



### FERO Foundation

participation in the charity dinner to raise funds for cancer research by the foundation.



### Joan Salvador Gavina Foundation

collaboration in the registration of two people for the Diploma of University Specialisation in Communication and Social Action Marketing of 2023 at the Blanquerna School of Communication and International Relations (URL).



**Conscious Capitalism:** Holaluz is the founding company of Conscious Capitalism in Spain, whose philosophy that recognises the innate potential for businesses to improve the world.



**Food Bank Foundation:** contribution equivalent to 770 kg of food for vulnerable families of the Christmas campaign 2021/2022, matching the contribution made by the Holaluz team on a voluntary basis.



The company has the internal **Bonusly** reward tool, where team members can redeem their points for donations to entities such as the Papallupes, Arrels Foundation, Open Arms, the Red Cross, and the Food Bank.



Holaluz also supports community development through a wide range of sponsorships such as:





During 2022, the company participated in and organised several events to share experiences and inspire the business community, investor, and society, including:

**Fixing the Future Festival.** Sponsor of the event in Barcelona with the mission of seeking creative solutions to change the world.



**Investor Day 2022.** First investor day since the company was listed on BME Growth. The event was held at the Holaluz offices and hosted more than 250 investors (both in person and online) where the main figures for the year 2021 were shared, and the impact model of the company and the team which made it possible were presented.

**#BGoodDay 2022.** Carlota Pi took part in a discussion in the "From purpose to action" panel discussion at the annual event of the B Corp movement in Spain where the topic was #SerB and how to put business ideas into practice while laying the foundations to move toward a more inclusive and sustainable economy.



**DES 2022.** Participation in a round table discussion in Malaga where Holaluz shared its experience as a high-growth Greentech company with a focus on technology and scalability.



**AWS Summit Madrid 2022.** Amazon Web Services has launched its infrastructure region in Spain (Aragon) and has taken advantage of the event to create synergies in the sustainability sector.



**"Mario's Hour" by ElTiempo.es.** A "dinner off" for the planet in the form of a panel discussion, where the future of sustainability was discussed with other responsible brands.



**4YFN.** Fireside chat with Carlota Pi entitled 'How to Keep Purpose at the Core of a Scaling Organisation' moderated by Oriol Juncosa where they talked about the importance of having and maintaining a clear purpose in a high-growth company.



**Bloomberg LP's Spain Capital Markets Forum**

in Madrid. Carlota Pi participated in the Promising & Fast Growing firms panel of companies together with Juan de Antonio (Cabify), Diego Cabezudo (Gigas) and Eric Asuncion (Wallbox Chargers). The debate focused on the prospects of the Spanish economy in a context of recovery and the impact of the EU's New Generation Funds on the green and digital space.



**Competitiveness and Growth of the New Spanish Technology Company Through People.** Participation in

the round table discussion on the importance of talent generation and attraction as the main competitive element in high-growth technology companies.

**Datathon against Racism.** Sponsor of the competition organised by BcnAnalytics that aimed to develop an algorithm that could identify racist messages posted on Twitter. In addition to the monetary contribution, two teams made up of members of the Holaluz staff participated in the Datathon.

# Customers

Holaluz puts customers at the centre of its decision-making process and strives to build a relationship of **mutual trust**. The company focuses on delivering the best experience to its customers and the highest savings through technology and data-intensive optimisation:



**Customer Satisfaction** for the solar installation business has an average of **8.3/10 rating**.



**Customer Care** tool that has enabled the resolution of more than **70% of incidents** in the first contact on average during the reporting period.



**Artificial intelligence** to accelerate solutions for customers.



**Optimisation of solar surpluses** to deliver the greatest savings to customers.

**2022 has been a year of deep transformation for the energy sector and Holaluz.** A year marked by unprecedented extreme volatility in energy prices and the war in Ukraine. These extreme market conditions have translated into significantly higher electricity bills for customers, consequently increasing the sector's revenue rates. Holaluz has not been immune.

As a result, the company's customer metrics were lower than usual, particularly with respect to the commercialisation of renewable electricity.

As for the solar installation business, **customer metrics continued to be optimal, earning an average rating of 8.3/10 in the customer surveys** conducted after each installation.





The company holds the **Confianza Online Seal**, the leading Internet quality certificate in Spain that recognises companies that guarantee maximum transparency, security and trust when buying from and browsing their websites.



For Holaluz, quality customer service is a key aspect, hence it is developing a **Quality Policy** and implementing a quality management system in accordance with ISO 9001, which it expects to obtain next year.



The company is also a member of the **Spanish Association of Experts in Customer Relations (AEERC)**, a non-profit organisation whose mission is to provide its members with the necessary tools to improve their customer service. The AEERC, which represents more than 200 companies in Spain, is the representative of the European Confederation of Contact Centre Associations (ECCCO) and maintains close and growing relationships with its counterparts in Spanish-speaking countries.



Holaluz also has a **Default Policy**, based on humanity and respect. The supply is never cut off on Fridays. All reconnections are managed in 48 hours (most in 24 hours). Holaluz has never faced litigation related to cut-offs and we provide a wide range of payment methods to help our customers overcome difficult moments.



Customer data security is a priority, which is why we have a **Security Plan** containing detailed steps on improving the customer security management by implementing ISO 27001 management processes which are expected to be certified next year. This plan will ensure the protection, confidentiality and integrity of data and information, as well as the systems that process them.

Audits and intrusion tests are also carried out on IT systems and the implementation of solutions to improve and automate the management of information security. Verification mechanisms are also available in customer service to ensure that we only deliver information to the relevant customer. We are currently working to establish behavioural patterns with customer data and thus the company expects to offer better rates.

Despite all the established procedures, it is worth mentioning an isolated incident last November where unauthorised access to Holaluz' systems was detected that affected a limited number of customers and compromised some sensitive data. The incident was immediately resolved thanks to the diligence of the company, in accordance with current legal procedures and following the procedure established by the Spanish Data Protection Agency (AEPD).



# Suppliers

Holaluz works throughout the value chain (particularly with suppliers and partners) and makes an effort to build positive and lasting relationships based on trust and mutual benefit by encouraging local purchasing. A total of 95% of the expenditure on suppliers is destined for local suppliers (companies that have their fiscal headquarters in Spain).

To ensure good long-term relationships with suppliers and partners, the company has developed a series of guidelines and rules that regulate relationships with third parties at all times. During the reporting period, work has been done to draft the **Responsible Purchasing Policy**, which establishes a set of principles and commitments that guarantee the alignment of the company's vision and its ESG commitments (environmental, social and governance) with its purchasing activities, and the United Nations Sustainable Development Goals (SDGs) framework. Likewise, the company has a [Contract Policy that regulates relationships with third parties](#) and, in addition, is the mechanism that ensures the commitment of the partners with **legal compliance as well as ethical and anti-corruption standards**.

In addition, Holaluz only partners with companies that share its vision, values and commitment to sustainability and engages with public institutions to join forces and accelerate the change of society. In order to build the future and lead the transition of today's electricity sector, it partners with market experts.





### Green energy distribution and transport companies

Holaluz works with the energy distributors established by the government according to the geographical area, which are responsible for delivering electricity to end consumers once they receive it from the carrier - Red Española de Electricidad (Spanish Electricity Network) - in the substations attached to the large consumption centres.



### Independent producers of 100% green energy

Holaluz acts as a representative of Spanish and Portuguese producers in the electricity market (OMIE).



### Network of installer companies

The company has its own team of installers, but it also uses the services of installation companies for some specific locations. The external installation team is carefully recruited and undergoes quality training and a trial period before starting work.



### Material suppliers

Holaluz works to ensure the best quality-price ratio according to our customers' needs and the ESG strategy. Direct material costs have been optimised through a combination of different strategies by product category: solar panels, inverters, solar mounting structure, electrical equipment, and electric vehicle chargers.

All Holaluz contracting and commercial negotiations are governed by the principles of transparency and conducted in strict compliance with the law. The company does not tolerate the use of commercial or business-related corrupt practices and requires compliance with its **Code of Ethics**.

Holaluz has ad hoc **supplier evaluation processes** by typology. These include safety visits to the facilities by external installation companies and coordination meetings with external installation companies to review any on-site incidents, the company's documentation, and that of its team of workers and the safety criteria to be applied in the facilities. In the case of suppliers of solar facility materials, such as solar panels, with a higher potential environmental and social risk, the company evaluates its performance in these diMenions based on a documentary review of the external certifications, recognitions, public commitments and initiatives developed.







# Annex



# Annex I – Indicators

The following sections compare the company's performance across different indicators during 2022 with the results of the previous year.

In 2022, Holaluz's operations were significantly different compared to the previous year due to the Rooftops Revolution's fast growth. This is also the reason behind the increase in environmental and social vectors and includes acquiring logistics warehouses, a fleet of vehicles for the installation and sales teams, etc. purchasing materials for solar installations, and hiring staff to cover distinct functions within the development of the company.

## I. ENVIRONMENT

The focus on environmental management is explained in chapter **5. Commitment to the environment**. The data reported refers to the entire company, unless otherwise stated.

Waste production in the office has been estimated according to the annual waste produced in the entire building and segregating the plants where Holaluz operates. An estimate of the waste generated by works has also been made for waste generated in warehouses.

### 1. Waste

| Non-hazardous waste    | Processing               | 2021 (t)    | 2022 (t)     |
|------------------------|--------------------------|-------------|--------------|
| Cardboard packaging    | Transformation and reuse | -           | 17.17        |
| Paper and cardboard    | Transformation and reuse | 0.86        | 1.58         |
| Plastic containers     | Recycling                | 0.85        | 1.66         |
| Banal                  | Separation and transfer  | 3.68        | 4.63         |
| Wooden pallets         | Reuse                    | 0           | 12.48        |
| Glass                  | Transformation and reuse | 0.30        | 0.50         |
| Batteries              | Reuse                    | 0.002       | -            |
| Electrical materials   | Separation and recycling | -           | 0.15         |
| Defective solar panels | Separation and recycling | -           | 1.37         |
| <b>Total</b>           |                          | <b>5.69</b> | <b>39.24</b> |

## 2. Raw materials

Since 2022, significant raw materials for our activity have been quantified both in the office and in warehouses.

| Raw materials consumed: Offices | Unit of measurement | 2022    |
|---------------------------------|---------------------|---------|
| Paper                           | Unit                | 237,500 |
| Stationary                      | Unit                | 2,087   |
| Toner cartridges                | Unit                | 13      |

| Raw materials consumed: Installation of solar panels | Unit of measurement | 2021   | 2022   |
|--|---------------------|--------|--------|
| Panels   | Unit                | 13,432 | 46,619 |
| Structures   | Unit                | 13,432 | 46,601 |
| Inverters  | Unit                | 779    | 3,658  |
| Smart meters   | Unit                | 842    | 3,443  |
| Microinverters                                       | Unit                | 637    | 0      |

## 3. Water

| Water consumption             | 2021   | 2022     |
|-------------------------------|--------|----------|
| Mains water (m <sup>3</sup> ) | 719.70 | 1,249.60 |

| Evolution of water consumption | 2021 | 2022 |
|--------------------------------|------|------|
| m <sup>3</sup> /employee       | 2    | 1.7  |

## 4. Energy

| Energy consumed                          | 2021    | 2022    |
|--|---------|---------|
| Diesel (litres)                          | 0       | 91,587  |
| Gasoline (litres)                        | 0       | 560     |
| Electricity from renewable sources (kWh) | 148,628 | 259,651 |

| Consumption intensity                                      | 2021  | 2022 |
|--|-------|------|
| Electricity consumption/solar panel module installed (kWh) | 11.07 | 5.57 |
| Fossil fuel consumption/solar panel module installed (kWh) | N/A   | 1.98 |

## 5. Climate change

|  | 2021 | 2022 |
|--|------|------|
| t CO <sub>2</sub> eq/turnover (€M) <sup>31</sup> | 238  | 151  |

<sup>32</sup>The turnover considered for this calculation does not include the representation business line, which is affected by the volatility of electricity prices and has no impact on the carbon footprint.

## II. SOCIAL

### 1. Employees<sup>32</sup>

| 2021         | Women     |           |           |           |          |            | Men       |           |           |           |          |            | Total      |
|--------------|-----------|-----------|-----------|-----------|----------|------------|-----------|-----------|-----------|-----------|----------|------------|------------|
|              | 16-29     | 30-39     | 40-49     | 50-60     | >60      | Total      | 16-29     | 30-39     | 40-49     | 50-60     | >60      | Total      |            |
| C.1          | -         | 2         | 7         | -         | -        | 9          | 2         | 4         | 5         | -         | -        | 11         | 20         |
| C.2          | 19        | 42        | 10        | 4         | -        | 75         | 29        | 56        | 21        | 10        | -        | 116        | 191        |
| C.3          | 16        | 33        | 20        | 7         | -        | 76         | 29        | 21        | 9         | 8         | -        | 67         | 143        |
| <b>Total</b> | <b>35</b> | <b>77</b> | <b>37</b> | <b>11</b> | <b>-</b> | <b>160</b> | <b>60</b> | <b>81</b> | <b>35</b> | <b>18</b> | <b>-</b> | <b>194</b> | <b>354</b> |

| 2022         | Women     |            |           |           |          |            | Men        |            |            |           |          |            | Total      |
|--------------|-----------|------------|-----------|-----------|----------|------------|------------|------------|------------|-----------|----------|------------|------------|
|              | 16-29     | 30-39      | 40-49     | 50-60     | >60      | Total      | 16-29      | 30-39      | 40-49      | 50-60     | >60      | Total      |            |
| C.1          | 2         | 9          | 8         | 3         | -        | 22         | 3          | 16         | 15         | 5         | -        | 39         | 61         |
| C.2          | 51        | 86         | 40        | 11        | -        | 188        | 52         | 91         | 73         | 40        | 2        | 258        | 446        |
| C.3          | 25        | 33         | 21        | 8         | 1        | 88         | 52         | 50         | 34         | 20        | 1        | 157        | 245        |
| <b>Total</b> | <b>78</b> | <b>128</b> | <b>69</b> | <b>22</b> | <b>1</b> | <b>298</b> | <b>107</b> | <b>157</b> | <b>122</b> | <b>65</b> | <b>3</b> | <b>454</b> | <b>752</b> |

#### Classification by professional group

C.1 Management team

C.2 Middle management and qualified technicians

C.3 Operations, sales, administrative support

#### Time worked

FT: Full time

PT: Part time

<sup>32</sup> Number of employees counted with the Headcount system at 31/12/2022.

Regarding the significant increase of the Holaluz team, the company reinforced its structure during the 2022 fiscal year to carry out the Roofing Revolution, with the incorporation of many solar experts (commercial) and solar installers as well as support professionals across the rest of the organisation.



2. Contract modalities<sup>33</sup><sup>33</sup>Number of persons counted with the Headcount system as of 31/12/2021 and 31/12/2022.

| 2021      |      | 16-29 | 30-39 | 40-49 | 50-60 | >60 | Total | W   | M   | Total |
|-----------|------|-------|-------|-------|-------|-----|-------|-----|-----|-------|
|           |      | 103   | 151   | 61    | 26    | -   | 341   | 148 | 193 | 341   |
| Permanent | F.T. | 93    | 143   | 55    | 25    | -   | 316   | 133 | 183 | 316   |
|           | P.T. | 10    | 8     | 6     | 1     | -   | 25    | 15  | 10  | 25    |
| Temporary |      | 2     | 6     | 3     | 2     | -   | 13    | 12  | 1   | 13    |
|           | F.T. | 2     | 5     | 3     | 2     | -   | 12    | 11  | 1   | 12    |
|           | P.T. | -     | 1     | -     | -     | -   | 1     | 1   | -   | 1     |
| Total     |      | 105   | 157   | 64    | 28    | -   | 354   | 160 | 194 | 354   |

| 2022      |      | 16-29 | 30-39 | 40-49 | 50-60 | >60 | Total | W   | M   | Total |
|-----------|------|-------|-------|-------|-------|-----|-------|-----|-----|-------|
|           |      | 170   | 259   | 166   | 68    | 1   | 664   | 272 | 392 | 664   |
| Permanent | F.T. | 158   | 257   | 160   | 67    | 1   | 643   | 262 | 381 | 643   |
|           | P.T. | 12    | 2     | 6     | 1     | -   | 21    | 10  | 11  | 21    |
| Temporary |      | 15    | 26    | 25    | 19    | 3   | 88    | 26  | 62  | 88    |
|           | F.T. | 11    | 26    | 25    | 19    | 3   | 84    | 24  | 60  | 84    |
|           | P.T. | 4     | -     | -     | -     | -   | 4     | 2   | 2   | 4     |
| Total     |      | 185   | 285   | 191   | 87    | 4   | 752   | 298 | 454 | 752   |

| 2021      |      | C1 | C2  | C3  | Total |
|-----------|------|----|-----|-----|-------|
|           |      | 20 | 191 | 130 | 341   |
| Permanent | F.T. | 20 | 187 | 109 | 316   |
|           | P.T. | -  | 4   | 21  | 25    |
| Temporary |      | -  | -   | 13  | 13    |
|           | F.T. | -  | -   | 12  | 12    |
|           | P.T. | -  | -   | 1   | 1     |
| Total     |      | 20 | 191 | 143 | 354   |

| 2022      |      | C1 | C2  | C3  | Total |
|-----------|------|----|-----|-----|-------|
|           |      | 60 | 400 | 204 | 664   |
| Permanent | F.T. | 60 | 394 | 189 | 643   |
|           | P.T. | -  | 6   | 15  | 21    |
| Temporary |      | 1  | 46  | 41  | 88    |
|           | F.T. | 1  | 46  | 37  | 84    |
|           | P.T. | -  | -   | 4   | 4     |
| Total     |      | 61 | 446 | 245 | 752   |

3. Average of contracts<sup>34</sup>

<sup>34</sup> The average numbers of contracts have been calculated according to the FTE by time worked in the year and by the percentage of the day.

| 2021      |      | 16-29 | 30-39 | 40-49 | 50-60 | >60 | Total | W     | M     | Total |
|-----------|------|-------|-------|-------|-------|-----|-------|-------|-------|-------|
|           |      | 79,3  | 126,7 | 50,3  | 17,1  | -   | 273,4 | 129,5 | 143,9 | 273,4 |
| Permanent | F.T. | 74,9  | 120,6 | 45,6  | 16,1  | -   | 257,2 | 118,1 | 139,1 | 257,2 |
|           | P.T. | 4,4   | 6,1   | 4,7   | 1,0   | -   | 16,2  | 11,4  | 4,8   | 16,2  |
|           |      | 0,1   | 1,3   | 0,3   | 1,0   | -   | 2,7   | 2,6   | 0,1   | 2,7   |
| Temporary | F.T. | 0,1   | 0,3   | 0,3   | 1,0   | -   | 1,7   | 1,6   | 0,1   | 1,7   |
|           | P.T. | -     | 1,0   | -     | -     | -   | 1,0   | 1,0   | -     | 1,0   |
| Total     |      | 79,4  | 128,0 | 50,6  | 18,1  | -   | 276,1 | 132,1 | 144,0 | 276,1 |

| 2022      |      | 16-29 | 30-39 | 40-49 | 50-60 | >60 | Total | W     | M     | Total |
|-----------|------|-------|-------|-------|-------|-----|-------|-------|-------|-------|
|           |      | 132,9 | 216,1 | 128,6 | 67,9  | 1,0 | 546,5 | 210,7 | 335,8 | 546,5 |
| Permanent | F.T. | 129,3 | 214,6 | 125,5 | 67,7  | 1,0 | 538,1 | 205,9 | 332,2 | 538,1 |
|           | P.T. | 3,6   | 1,5   | 3,1   | 0,2   | -   | 8,4   | 4,8   | 3,6   | 8,4   |
|           |      | 4,5   | 7,0   | 8,4   | 5,3   | 0,7 | 25,9  | 9,9   | 16,0  | 25,9  |
| Temporary | F.T. | 4,4   | 7,0   | 8,4   | 5,3   | 0,7 | 25,8  | 9,9   | 15,9  | 25,8  |
|           | P.T. | 0,1   | -     | -     | -     | -   | 0,1   | 0,0   | 0,1   | 0,1   |
| Total     |      | 137,4 | 223,1 | 137,0 | 73,2  | 1,7 | 572,4 | 220,6 | 351,8 | 572,4 |

| 2021      |     | C1   | C2    | C3   | Total |
|-----------|-----|------|-------|------|-------|
|           |     | 18,3 | 161,5 | 93,6 | 273,4 |
| Permanent |     | 18,3 | 157,4 | 81,5 | 257,2 |
|           |     | -    | 4,1   | 12,1 | 16,2  |
|           |     | -    | -     | 2,7  | 2,7   |
| Temporary |     | -    | -     | 1,7  | 1,7   |
|           | T.P | -    | -     | 1,0  | 1,0   |
| Total     |     | 18,3 | 161,5 | 96,3 | 276,1 |

| 2022      |     | C1   | C2    | C3    | Total |
|-----------|-----|------|-------|-------|-------|
|           |     | 53,4 | 363,9 | 129,2 | 546,5 |
| Permanent |     | 53,4 | 361,0 | 123,7 | 538,1 |
|           |     | -    | 2,9   | 5,5   | 8,4   |
|           |     | 0,1  | 18,3  | 7,5   | 25,9  |
| Temporary |     | 0,1  | 18,3  | 7,4   | 25,7  |
|           | T.P | 0,0  | 0,0   | 0,1   | 0,1   |
| Total     |     | 53,5 | 382,2 | 136,7 | 572,4 |

## 4. Disability

|      | Women | Men | Total |
|------|-------|-----|-------|
| 2021 | 1     | 3   | 4     |
| 2022 | 2     | 5   | 7     |

Holaluz has signed collaboration agreements with the Aura and Estimia foundations to promote the inclusion of people with disabilities within the company and comply with the applicable laws in this area.

## 5. Dismissals<sup>35</sup>

| 2021         | Women    |          |          |          |          |           | Men      |          |          |          |          |           |   |
|--------------|----------|----------|----------|----------|----------|-----------|----------|----------|----------|----------|----------|-----------|---|
|              | 16-29    | 30-39    | 40-49    | 50-60    | >60      | Total     | 16-29    | 30-39    | 40-49    | 50-60    | >60      | Total     |   |
| C.1          | -        | -        | -        | -        | -        | -         | -        | -        | -        | -        | -        | -         | - |
| C.2          | 2        | 8        | 3        | -        | -        | 13        | 6        | 3        | 3        | -        | -        | 12        |   |
| C.3          | -        | -        | -        | -        | -        | -         | -        | -        | -        | -        | -        | -         |   |
| <b>Total</b> | <b>2</b> | <b>8</b> | <b>3</b> | <b>-</b> | <b>-</b> | <b>13</b> | <b>6</b> | <b>3</b> | <b>3</b> | <b>-</b> | <b>-</b> | <b>12</b> |   |

| 2022         | Women    |          |          |          |          |          | Men       |          |          |           |          |           |
|--------------|----------|----------|----------|----------|----------|----------|-----------|----------|----------|-----------|----------|-----------|
|              | 16-29    | 30-39    | 40-49    | 50-60    | >60      | Total    | 16-29     | 30-39    | 40-49    | 50-60     | >60      | Total     |
| C.1          | -        | -        | -        | -        | -        | -        | -         | 1        | -        | 1         | -        | 2         |
| C.2          | 2        | 1        | 2        | 2        | 0        | 7        | 13        | 7        | 6        | 15        | 2        | 43        |
| C.3          | -        | -        | -        | -        | -        | -        | -         | -        | -        | -         | -        | -         |
| <b>Total</b> | <b>2</b> | <b>1</b> | <b>2</b> | <b>2</b> | <b>-</b> | <b>7</b> | <b>13</b> | <b>8</b> | <b>6</b> | <b>16</b> | <b>2</b> | <b>45</b> |

<sup>35</sup> Cases of failure to pass the probationary period or termination of temporary contracts have not been considered dismissals.



## 6. Remuneration<sup>36</sup>

|             | Women  | Men    | 16-29  | 30-39  | 40-49  | 50-60  | >60    |
|-------------|--------|--------|--------|--------|--------|--------|--------|
| <b>2021</b> | 33,318 | 37,529 | 28,024 | 36,769 | 44,525 | 37,918 | 0      |
| <b>2022</b> | 35,448 | 37,039 | 29,499 | 40,506 | 41,708 | 30,764 | 13,162 |

|             | C.1    | C.2    | C.3           |
|-------------|--------|--------|---------------|
| <b>2021</b> | 85,115 | 38,710 | <b>24,370</b> |
| <b>2022</b> | 88,750 | 34,297 | <b>28,153</b> |

## 7. Salary gap<sup>37</sup>

|             | Global |
|-------------|--------|
| <b>2021</b> | 10%    |
| <b>2022</b> | 4%     |

<sup>36</sup> The calculation of the remuneration has considered fixed pay and variable pay received in the year and has been adjusted according to the FTE by time worked in the year and by the percentage of the day.

<sup>37</sup> Salary gap: Average remuneration men – Average remuneration women / Average remuneration men,

<sup>38</sup> The average remuneration of the governing bodies includes variable pay. They do not receive remuneration in the form of allowances, compensation, or other items.

(\*) Average remuneration per Headcount - Including the shareholders

(\*\*) Calculated by FTE

## 8. Average remuneration of governing bodies<sup>38</sup>

| <b>2021</b>                 | Women  | Men    |
|-----------------------------|--------|--------|
| <b>Directors (*)</b>        | 71,406 | 92,165 |
| <b>Management team (**)</b> | 66,822 | 69,194 |

| <b>2022</b>                 | Women   | Men     |
|-----------------------------|---------|---------|
| <b>Directors (*)</b>        | 124,482 | 126,849 |
| <b>Management team (**)</b> | 92,240  | 85,422  |

The average compensation has been updated according to market levels.

## 9. Training

| 2021         | Women        | Men        | Total        | 2022         | Women        | Men           | Total         |
|--------------|--------------|------------|--------------|--------------|--------------|---------------|---------------|
| C.1          | 51           | 141        | 192          | C.1          | 14           | 1,151         | 1,165         |
| C.2          | 1,235        | 521        | 1,756        | C.2          | 985          | 3,382         | 4,367         |
| C.3          | 162          | 51         | 213          | C.3          | 2,243        | 10,734        | 12,977        |
| <b>Total</b> | <b>1,448</b> | <b>713</b> | <b>2,161</b> | <b>Total</b> | <b>3,242</b> | <b>15,267</b> | <b>18,509</b> |

Training hours increased significantly with respect to the previous year due to the growth of the Rooftop Revolution. Numerous hours have been devoted to the training of sales staff and solar installers. Thanks to our improved information systems, we have been able to obtain information from more training sources compared to 2021.

## 10. Customer complaints

In 2022, we received a total of 1,820 complaints through consumer agencies with respect to the 631 received in 2021. The increase in complaints received is explained by the regulatory changes that occurred throughout the period reported, billing incidents and the divestment of the gas business, among other reasons. Complaints are handled within one month after receiving them. During the following year, the company will provide a detailed report on the accepted and rejected complaints. Clause 10 of the company's general terms and conditions contract sets out the mechanism for making a customer complaint directly to Holaluz. Customers also have access to the out-of-court procedures available by law.

## 11. Tax information

| 2021         | Pre-tax result<br>(€ 000s) | Income tax<br>(€ 000s) | Public subsidies<br>(€ 000s) |
|--------------|----------------------------|------------------------|------------------------------|
| Spain        | (11,395)                   | 3,709                  | 93                           |
| Portugal     | (898)                      | 181                    | -                            |
| France       | (4)                        | -                      | -                            |
| Italy        | (5)                        | -                      | -                            |
| <b>TOTAL</b> | <b>(12,302)</b>            | <b>3,890</b>           | <b>93</b>                    |

The grant received in 2021 is part of the European HORIZON 2020 project whose objective is, among others, to finance R&D projects and actions aimed at replacing fossil fuel vehicles with battery-electric vehicles that generate and use clean and more efficient energy.

| 2022         | Pre-tax result<br>(€ 000s) | Income tax<br>(€ 000s) | Public subsidies<br>(€ 000s) |
|--------------|----------------------------|------------------------|------------------------------|
| España       | (6,036)                    | 2,969                  | 0                            |
| Portugal     | (2.602)                    | 557                    | 0                            |
| Francia      | (3)                        | 0                      | 0                            |
| Italia       | (6)                        | 0                      | 0                            |
| <b>Total</b> | <b>(8,647)</b>             | <b>3,526</b>           | <b>0</b>                     |

No subsidies of any kind have been received during fiscal year 2022.



### III. GOVERNANCE

#### 1. Governing bodies

| Governing bodies                      | Meetings | Attendance |
|---------------------------------------|----------|------------|
| Board of Directors                    | 13       | 100%       |
| Audit Committee                       | 2        | 100%       |
| Nomination and Remuneration Committee | 1        | 100%       |

#### 2. Ethical channel: communications received

In 2022, Holaluz received 28 communications through the Alerts channel, compared to none in 2021. This sharp increase can be explained by the awareness campaign regarding the Alerts Channel undertaken internally and externally on the Holaluz website. None of these communications have been classified as complaints since the main reason for them were incidents with customers were subsequently redirected to the Customer Care team.



## Annex II – Taxonomy and climate risks

### 1. The European Union Taxonomy and Holaluz's purpose

In recognition of the need for a progressive and effective response to the pressing threat of climate change, the Paris Agreement was adopted in 2015, which aims to keep the global average temperature rise well below 2°C (preferably 1.5°C). with respect to pre-industrial levels.

To achieve this global goal, the European Union (EU) has set the goal of becoming carbon neutral by 2050, and to reduce greenhouse gas emissions to at least 55% below 1990 levels by 2030.

Aware of the enormous effort that decarbonisation of the economy will entail, the EU has developed a set of measures to involve private capital in the path of the ecological transition and to redirect capital flows toward environmentally sustainable and inclusive activities, enabling climate-resilient economic development with low greenhouse gas emissions. To be able to achieve its carbon neutrality objective by 2050, the European Commission has developed a comprehensive policy agenda on sustainable finance to ensure the achievement of this ambitious climate change goal, which includes the “Sustainable Finance Action Plan” of 2018, and the “Action Plan for financing the

transition to the sustainable economy” published in July 2021. At the heart of this Action Plan is Regulation (EU) 2020/852 (hereinafter the EU Taxonomy Regulation or EU Green Taxonomy), an essential lever to achieve the goal of achieving a Net Zero European Union by 2050.

*The Sustainable Finance Action Plan aims to reorient capital flows towards sustainable investment and manage financial risks arising from ESG issues.*

The Action Plan and, more specifically, the Taxonomy, aligns with Holaluz's purpose: to create and live in a 100% renewable world. The company was formed in response to the global challenge of climate change, enabling the transition to renewable energies and, it is now the first company to exclusively commercialise green energy from renewable sources, and is among the leading companies in the solar segment in Spain. Therefore, the Taxonomy makes it possible to put Holaluz's pioneering approach to pursuing an energy transition model that pursues decarbonisation in line with the EU's climate objectives.

Holaluz and all the people who believe in its energy, will continue to progress toward the 2030 and 2050 objectives, and all those which are yet to come.

### What is the EU Taxonomy Regulation?

Put simply, the Taxonomy Regulation is a classification system that identifies to what degree economic activities can be considered environmentally sustainable. The goal is to prevent “greenwashing” and to help businesses to develop ESG roadmaps based on scientific objectives and

In order to determine the environmental sustainability of an economic activity, it must contribute to the achievement of certain environmental objectives. The Taxonomy Regulation establishes six environmental objectives. At the moment, the technical selection criteria have been developed only for two of the six objectives defined in the Taxonomy Regulation:

### 2. How Holaluz has implemented Taxonomy

This Regulation, which entered into force in 2021, establishes a series of economic activities (eligible activities) grouped according to 13 sectors. For an eligible activity to be considered as environmentally sustainable (aligned activity), it must contribute substantially to any one of the environmental objectives set out in the regulation (so far, climate change mitigation and climate change adaptation), must not cause significant damage to the remaining environmental objectives and must comply with a minimum of social safeguards.


To establish whether Holaluz’s activities are aligned with environmental objectives of the EU taxonomy, the company has analysed its activities the according to its criteria to determine whether or not they are performed sustainably.



Climate change mitigation



Climate change adaptation



Sustainable use and protection of water and marine resources



The transition to a circular economy



Pollution prevention and control



Protection and restoration of biodiversity and ecosystems

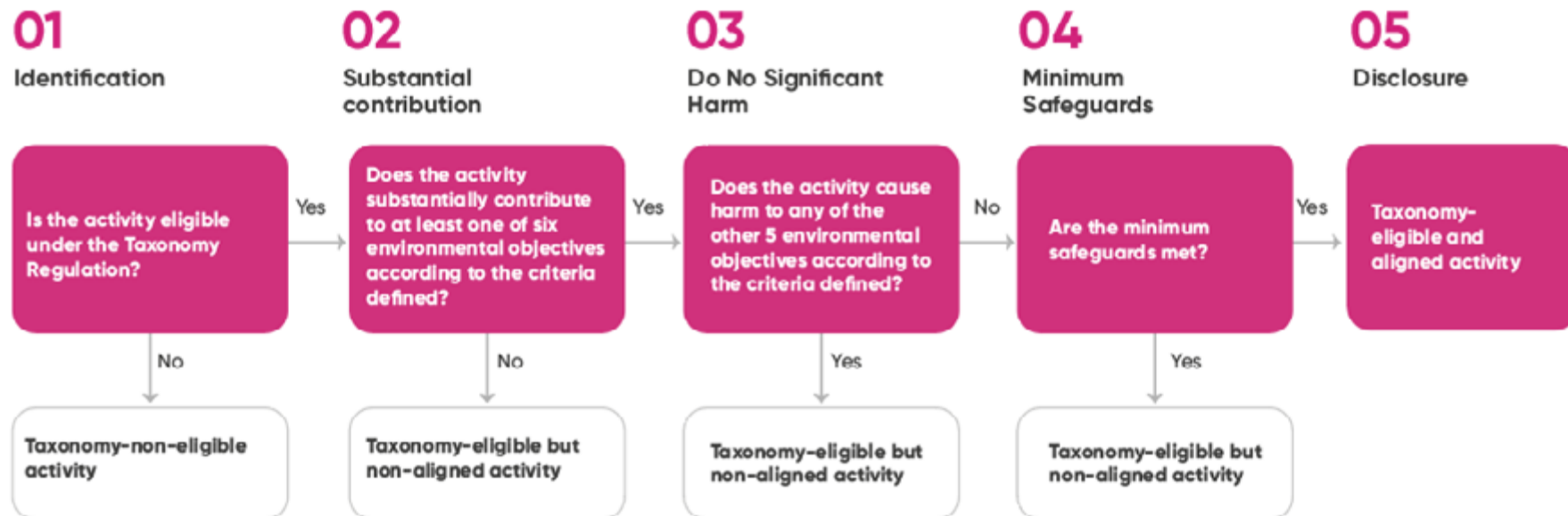


The process of determining the degree of alignment of the activities developed by Holaluz consisted, firstly, of identifying and classifying its activities and lines of business to ascertain whether they are eligible under the Taxonomy. The eligible activities are those described in Commission Delegated Regulation (EU) 2021/2139 (hereinafter, the Climate Delegated Act), either through a description of the activity or through a link with the CNAE codes.

As shown in the image above, the inclusion of an economic activity in the list of eligible activities does not imply that it is

aligned - that is, that it is considered sustainable according to the Taxonomy - it could be if the following requirements are fulfilled:

- i. The activity contributes substantially to the objective of mitigation or adaptation to climate change.
- ii. The activity causes no significant harm (DNSH) to the other five environmental targets. These are different criteria that the activities must meet and that are established in the annexes for each of the objectives.



iii. Finally, Holaluz complies with the so-called minimum safeguards, that is, with the OECD guidelines for multinational companies, the UN Guiding Principles on Business and Human Rights and the International Bill of Human Rights<sup>1</sup>.

Finally, for the different types of activities (i.e., ineligible, eligible-not aligned and eligible-aligned) Holaluz reports the indicators related to revenue, CapEx and OpEx, as established in the Delegated Act of Article 8 of the Taxonomy Regulation.

**Eligible activity\*:** an economic activity described and with the technical selection criteria established in the taxonomy.

**Aligned activity:** refers to an eligible economic activity that is making a substantial contribution to at least one of the climate and environmental objectives, while not causing significant damage to the remaining objectives and meeting minimum social standards.

*\*The absence of certain activities in the EU Taxonomy does not mean that they cannot become sustainable. The EU has defined an initial set of activities with major capacity or potential impact on climate and environment, which may be expanded in the future with additional activities.*

The information has been calculated in accordance with the provisions of Annex I of Delegated Regulation (EU) 2021/2178

<sup>1</sup> The minimum safeguards are based on the recommendations of the Group of Technical Experts (GTE) contained in its report published in March 2020. They were included during the subsequent stages of the TEG recommendations following a request from the European Parliament to ensure that entities engaged in

(hereinafter, the Climate Delegated Act) Article 8 for each economic activity regarding its eligibility and alignment. The result is presented according to the templates in Annex II in the last section of this Annex.



environmentally sustainable activities, labelled as Taxonomy-aligned meet certain minimum standards of governance, and do not violate social norms, including human and labour rights.

### 3. Analysis of activities according to the EU Taxonomy

Based the analysis, the following results have been obtained regarding alignment with the Taxonomy for 2022:

| Eligible and aligned activities   |   |  |
|---|---|--|
| Area of Activity  | Description of the Activity   | Link to the Taxonomy   |
| Installation and management of photovoltaic installations                           | Installation, management and maintenance of installations by means of photovoltaic solar panels.  | Activity 7.6. of the Climate Delegated Act: Installation, maintenance and repair of renewable energy technologies. |
| Non-eligible activities   |   |  |
| Area of Activity  | Description of the Activity   | Link to the Taxonomy   |
| Natural gas commercialisation <sup>2</sup>  | Gas sales to consumers, including actions such as purchasing gas for supply to households or businesses and coordinating with distributing companies for the correct supply of gas. | This activity is not considered in the Climate Delegated Act.  |
| Representation and management of the sales of renewable electricity producers.      | Representation in OMIE of energy generated by renewable energy producers.   | This activity is not considered in the Climate Delegated Act.  |
| Distributed generation and service provision within an "energy as a service" model. | Use of the surplus that can be generated by a domestic photovoltaic installation for sale to customers in the vicinity (those located within 2 km of the point of generation).      | This activity is not considered in the Climate Delegated Act.  |

<sup>2</sup>Holaluz withdrew from this business in October 2022 to focus on renewable and solar electricity.



| Other non-eligible activities                     |  |   |
|---|--|---|
| Area of Activity                                  | Description of the Activity  | Link to the Taxonomy  |
| Sales of electricity from 100% renewable sources. | Purchase of energy with Renewable Guarantee of Origin (GoO) certificates, to guarantee that the energy purchased comes from a renewable source, and subsequent marketing to customers. | This is currently considered ineligible as it is not included in the Climate Delegated Act. |

Thus, the activity of installation and management of photovoltaic installations carried out by Holaluz as part of the Rooftop Revolution is among the activities eligible for the Taxonomy.

The three steps mentioned above were followed to analyse the alignment of this activity with the Taxonomy:

| Alignment analysis of the activity 7.6. Installation, maintenance and repair of renewable energy technologies |  |
|---|--|
| Climate change mitigation objective   |  |
| Criterion   | Results of the alignment analysis  |
| <b>Substantial Contribution</b>   | Contribution to climate change mitigation since the activity consists of the installation, maintenance and repair of photovoltaic solar systems and auxiliary technical equipment. |
| <b>Do No Significant Harm (DNSH)</b>  | Compliance with DNSH for the climate change mitigation objective, by analysis of climate risks to which the activity is exposed and deployment of adaptation measures.             |
| <b>Minimal safeguards</b>   | Overall compliance with minimum safeguards in human rights, anti-corruption, taxation and fair competition.  |
| Climate change adaptation objective   |  |
| Criterion   | Results of the alignment analysis  |
| <b>Substantial Contribution</b>   | Climate change adaptation solutions are included.  |

|                                      |   |
|--------------------------------------|---|
| <b>Do No Significant Harm (DNSH)</b> | Compliance with the DNSH criteria for the adaptation objective, since photovoltaic installations are not located in buildings used to extract fossil fuels. |
| <b>Minimal safeguards</b>            | Overall compliance with minimum safeguards in human rights, anti-corruption, taxation and fair competition.   |

Compliance with these criteria makes this line of business a key element in the fight against climate change, and a viable and effective alternative to clean energy, which will help to achieve the ambitious EU climate goals.

By December 2022, Holaluz had installed more than 7,000 photovoltaic installations in 50 of the 52 Spanish provinces. Thus, Holaluz not only leads the energy transition, but does so through an impact business model that allows it to respond to the global challenge of the energy transition and climate change, connecting people to the network through a distributed generation model based on green energy.

#### 4. Goal 55 objective and green electricity commercialisation

Under the current wording of the Climate Delegated Act, neither the acquisition or sale of renewable energy can be considered eligible under the Taxonomy, as it does not fall within the wording of any of the definitions in the Delegated Climate Act and is therefore considered an activity that does not substantially contribute to climate change mitigation.

However, in time this may be revised in view of the "Goal 55" package of measures and the climate targets agreed by the Council and the European Parliament<sup>3</sup>. The "Goal 55" package consists of a set of proposals to review and update EU legislation and launch new initiatives to ensure that the European Union reduces its net greenhouse gas emissions – to ensure it reduces emissions by at least 55% by 2030 (compared to 1990 levels) to put the EU firmly on the path towards climate neutrality by 2050.



package of measures and the climate targets agreed by the Council and the European Parliament<sup>3</sup>. The "Goal 55" package consists of a set of proposals to review and update EU legislation and launch new initiatives to ensure that the European Union reduces its net greenhouse gas emissions – to ensure it reduces emissions by at least 55% by

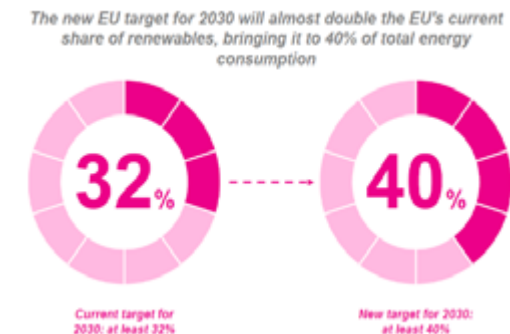
2030 (compared to 1990 levels) to put the EU firmly on the path towards climate neutrality by 2050.

<sup>3</sup> Commission Notice on the interpretation of certain legal provisions of the Disclosures Delegated Act under Article 8 of EU Taxonomy Regulation on the reporting of eligible economic activities and assets. Note 13.

According to the European Union, the transition to cleaner forms of energy is an indispensable condition for achieving climate neutrality. Under the "Goal 55" package, the EU is obliged to ensure that 40% rather than 32% of its energy consumption comes from renewable energy sources by 2030. That is, by 2030, at least 40% of all energy consumed in the EU must come from renewable sources.

To achieve the emission reduction targets, the activity carried out by renewable electricity trading companies such as Holaluz will be essential and we believe that, in future revisions, energy commercialisation activity from renewable sources will be considered as an eligible activity under the Climate Delegated Act.

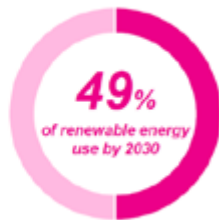
Likewise, in the sector in which the Holaluz Rooftop Revolution is developed, the new Directive on renewable





energy sources on which the EU is working, will propose that 49% of the energy in buildings come from renewable sources by 2030.

By supplying 100% green electricity (i.e. Of guaranteed origin from renewable sources), Holaluz



plays a catalytic role in the energy transition so vital to achieving the European Union's objectives.

Because of this, the following section presents the results

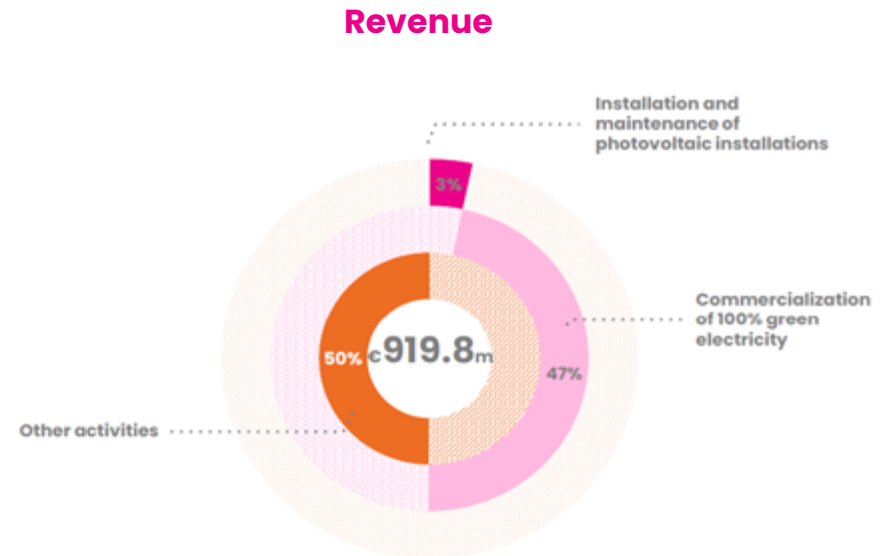
obtained, providing additional information considering sales of 100% green electricity.

### 5. The EU Taxonomy at a glance

In the first reporting period, the degree of alignment of the activities carried out by Holaluz with the EU Taxonomy, as a consequence of its contribution to the objective of climate change mitigation, without causing significant damage to the

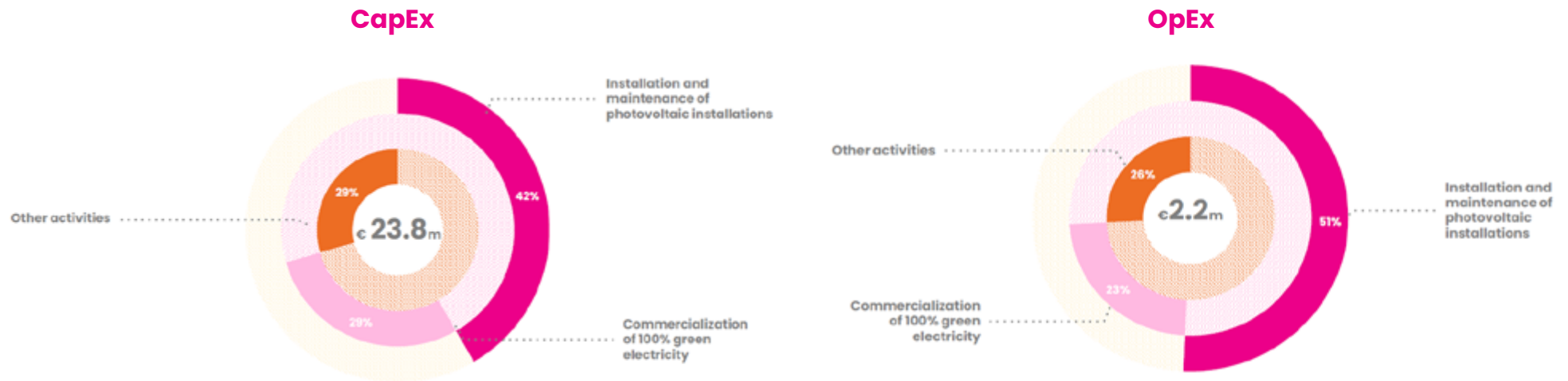
<sup>4</sup> As mentioned in paragraph 4, the KPIS relating to the marketing of 100% green electricity are provided as supplementary information, although

other five environmental objectives defined and respecting the minimum safeguard has been<sup>4</sup>:



- A total of 3.3% of revenue was generated by eligible business activities aligned with the EU taxonomy. Including commercialisation of 100% green electricity, the proportion is 50.2% and including representation and management of the sales of renewable electricity producers the proportion is 95,9% of operating revenue.

*this activity is not, at the date of publication of this report, an eligible activity according to the Climate Delegated Act.*



- A total of 41.7% of capital expense (CapEx) was generated by eligible business activities aligned with the EU taxonomy.
- Including commercialisation of 100% green electricity, the proportion is 70.6% of the CapEx.

- A total of 50.7% of operating expenses (OpEx) was generated by eligible business activities aligned with the EU taxonomy.
- Including commercialisation of 100% green electricity, the proportion is 75.1% of the OpEx.

When an economic activity contributes to several environmental objectives, companies must disclose the proportion of revenue, CapEx and OpEx of that activity that contributes to each environmental objective. This is the case of the activity “7.6. Installation, maintenance and repair of renewable energy technologies”, present in both Annex I (mitigation) and Annex II

(adaptation) of the Climate Delegated Act and, in the case of Holaluz, aligned with both objectives.

However, in the case of Holaluz only the alignment of revenue, CapEx and OpEx with the climate change mitigation objective is shown in accordance with the indications in Annex I of the Delegated Act of Article 8. Nevertheless, as indicated above in paragraph “3. Analysis of activities according to the EU Taxonomy” of this Annex, activity “7.6. Installation, maintenance and repair of renewable energy technologies” carried out by Holaluz is aligned with both the mitigation and adaptation objectives.

## 6. Scope of the Annex

All the companies that make up the consolidation perimeter of Holaluz have been considered in the analysis carried out to establish the eligible activities under the criteria of the European Commission for Taxonomy. Holaluz has established the necessary

control measures to ensure the correct application of the accounting principles of consolidation and avoid double accounting for all financial indicators.

On the other hand, according to the Delegated Act of Article 8, non-financial companies, such as Holaluz, must explain the figures for each key performance indicator and the reasons for any changes in those figures in the reporting period. However, since this is the first year of application of the EU Taxonomy Regulation for Holaluz, no comparable information is available. In this regard, the available data refer exclusively to 2022.

## 7. Economic KPIs

Below is the result of the three KPIs required by Article 8 of the Taxonomy Regulation by Economic Activity in terms of their eligibility and alignment with the Taxonomy.



**Revenue (expressed in millions of Euros)**

| Economic activities (1)  | Code (2) | Absolute revenue (3) | Share of revenue (4) | Substantial Contribution Criteria |                               |                                |                      |               |                                  | Criteria of absence of significant damage  |  |   |                                   |                            |  | Minimum guarantees (17) | Proportion of revenue conforming to Taxonomy 2022, Year N (18) | Proportion of revenue according to Taxonomy year N-1 (19) | Facilitating activity (F)/ Transitional activity (T) (20) |
|--|----------|----------------------|----------------------|-----------------------------------|-------------------------------|--------------------------------|----------------------|---------------|----------------------------------|--|--|---|-----------------------------------|----------------------------|--|-------------------------|--|---|---|
|  |          |                      |                      | Climate change mitigation (5)     | Climate change adaptation (6) | Water and marine resources (7) | Circular economy (8) | Pollution (9) | Biodiversity and ecosystems (10) | Climate change mitigation (11) (No number) | Climate change adaptation (12) (No number) | Water and marine resources (13) (No number) | Circular economy (14) (No number) | Pollution (15) (No number) | Biodiversity and ecosystems (16) (No number) |                         |  |   |   |
| <b>A. ELIGIBLE ACTIVITIES BASED ON TAXONOMY</b>  |          |                      |                      |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |   |   |
| <b>A1. Environmentally sustainable activities (which conform to the Taxonomy).</b>   |          |                      |                      |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |   |   |
| Installation, maintenance and repair of renewable energy technologies  | 7.6      | 30.7                 | 3.3%                 | 100%                              | 0%                            | N/A                            | N/A                  | N/A           | N/A                              |  | S  | S   | S                                 | S                          | S  | S                       | 3.3%   | N/A   |   |
| <b>Volume of environmentally sustainable activities (which conform to the Taxonomy) (A.1)</b>                                    |          | 30.7                 | 3.3%                 | 100%                              | 0%                            | N/A                            | N/A                  | N/A           | N/A                              |  |  |   |                                   |                            |  |                         | 3.3%   | N/A   |   |
| <b>A2. Eligible activities according to taxonomy but not environmentally sustainable (not in accordance with Taxonomy).</b>      |          |                      |                      |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |   |   |
| <b>Revenue of taxonomy-eligible but not environmentally sustainable activities (activities not conforming to taxonomy) (A.2)</b> |          | 0                    | 0%                   |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |   |   |
| <b>Total (A.1 + A.2)</b>   |          | 30.7                 | 3.3%                 |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         | 3.3%   | N/A   |   |
| <b>B. ACTIVITIES NOT ELIGIBLE ACCORDING TO TAXONOMY</b>  |          |                      |                      |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |   |   |
| <b>Revenue of activities not eligible according to taxonomy (B)</b>  |          | 889.1                | 96.7%                |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |   |   |
| <b>TOTAL (A+B)</b>   |          | 919.8                | 100.0%               |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |   |   |

**CapEx (expressed in millions of Euros)**

| Economic activities (1)   | Code (2) | Absolute CapEx (3) | Proportion of CapEx (4) | Substantial Contribution Criteria |                               |                                |                      |               |                                  | Criteria of absence of significant damage  |  |   |                                   |                            |  | Minimum guarantees (17) | Proportion of CapEx conforming to Taxonomy 2022, Year N (18) | Proportion of CapEx conforming to Taxonomy year N-1 (19) | Facilitating activity (F)/ Transitional activity (T) (20) |
|---|----------|--------------------|-------------------------|-----------------------------------|-------------------------------|--------------------------------|----------------------|---------------|----------------------------------|--|--|---|-----------------------------------|----------------------------|--|-------------------------|--|--|---|
|   |          |                    |                         | Climate change mitigation (5)     | Climate change adaptation (6) | Water and marine resources (7) | Circular economy (8) | Pollution (9) | Biodiversity and ecosystems (10) | Climate change mitigation (11) (No number) | Climate change adaptation (12) (No number) | Water and marine resources (13) (No number) | Circular economy (14) (No number) | Pollution (15) (No number) | Biodiversity and ecosystems (16) (No number) |                         |  |  |   |
| <b>A. ELIGIBLE ACTIVITIES BASED ON TAXONOMY</b>   |          |                    |                         |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |  |   |
| <b>A1. Environmentally sustainable activities (which conform to the Taxonomy).</b>  |          |                    |                         |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |  |   |
| Installation, maintenance and repair of renewable energy technologies   | 7.6      | 9.9                | 41.7%                   | 100%                              | 0%                            | N/A                            | N/A                  | N/A           | N/A                              |  | S  | S   | S                                 | S                          | S  | S                       | 41.7%  | N/A  |   |
| <b>Volume of environmentally sustainable activities (which conform to the Taxonomy) (A.1)</b>                               |          | 9.9                | 41.7%                   | 100%                              | 0%                            | N/A                            | N/A                  | N/A           | N/A                              |  |  |   |                                   |                            |  |                         | 41.7%  | N/A  |   |
| <b>A2. Eligible activities according to taxonomy but not environmentally sustainable (not in accordance with Taxonomy).</b> |          |                    |                         |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |  |   |
| <b>CapEx of eligible but not environmentally sustainable activities (activities not conforming to taxonomy) (A.2)</b>       |          | 0                  | 0%                      |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |  |   |
| <b>Total (A.1 + A.2)</b>  |          | 9.9                | 41.7%                   |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         | 41.7%  | N/A  |   |
| <b>B. ACTIVITIES NOT ELIGIBLE ACCORDING TO TAXONOMY</b>   |          |                    |                         |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |  |   |
| <b>CapEx of activities not eligible according to taxonomy (B)</b>   |          | 13.9               | 58.3%                   |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |  |   |
| <b>TOTAL (A+B)</b>  |          | 23.8               | 100.0%                  |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |  |  |   |

**OpEx (expressed in millions of Euros)**

| Economic activities (1)   | Code (2) | Absolute OpEx (3) | Proportion of OpEx (4) | Substantial Contribution Criteria |                               |                                |                      |               |                                  | Criteria of absence of significant damage  |  |   |                                   |                            |  | Minimum guarantees (17) | Proportion of OpEx conforming to Taxonomy 2022, Year N (18) | Proportion of OpEx conforming to Taxonomy N-1 (19) | Facilitating activity (F)/ Transitional activity (T) (20) |
|---|----------|-------------------|------------------------|-----------------------------------|-------------------------------|--------------------------------|----------------------|---------------|----------------------------------|--|--|---|-----------------------------------|----------------------------|--|-------------------------|---|--|---|
|   |          |                   |                        | Climate change mitigation (5)     | Climate change adaptation (6) | Water and marine resources (7) | Circular economy (8) | Pollution (9) | Biodiversity and ecosystems (10) | Climate change mitigation (11) (No number) | Climate change adaptation (12) (No number) | Water and marine resources (13) (No number) | Circular economy (14) (No number) | Pollution (15) (No number) | Biodiversity and ecosystems (16) (No number) |                         |   |  |   |
| <b>A. ELIGIBLE ACTIVITIES BASED ON TAXONOMY</b>   |          |                   |                        |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |   |  |   |
| <b>A1. Environmentally sustainable activities (which conform to the Taxonomy).</b>  |          |                   |                        |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |   |  |   |
| Installation, maintenance and repair of renewable energy technologies   | 7.6      | 1.1               | 50.7%                  | 100%                              | 0%                            | N/A                            | N/A                  | N/A           | N/A                              |  | S  | S   | S                                 | S                          | S  | S                       | 50.7%   | N/A  |   |
| <b>Volume of environmentally sustainable activities (which conform to the Taxonomy) (A.1)</b>                               |          | 1.1               | 50.7%                  | 100%                              | 0%                            | N/A*                           | N/A*                 | N/A*          | N/A*                             |  |  |   |                                   |                            |  |                         | 50.7%   | N/A  |   |
| <b>A2. Eligible activities according to taxonomy but not environmentally sustainable (not in accordance with Taxonomy).</b> |          |                   |                        |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |   |  |   |
| <b>OpEx of activities eligible but not environmentally sustainable (activities not conforming to taxonomy) (A.2)</b>        |          | 0                 | 0%                     |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |   |  |   |
| <b>Total (A.1 + A.2)</b>  |          | 1.1               | 50.7%                  |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         | 50.7%   | N/A  |   |
| <b>B. ACTIVITIES NOT ELIGIBLE ACCORDING TO TAXONOMY</b>   |          |                   |                        |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |   |  |   |
| <b>OpEx of activities not eligible according to taxonomy (B)</b>  |          | 1.1               | 49.3%                  |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |   |  |   |
| <b>TOTAL (A+B)</b>  |          | 2.2               | 100.0%                 |                                   |                               |                                |                      |               |                                  |  |  |   |                                   |                            |  |                         |   |  |   |



## i. GRI

| GRI Standard | Number |  | Page      |
|--------------|--------|--|-----------|
| GRI 2        | 2-1    | Details of the organisation                                      | 4         |
| GRI 2        | 2-2    | Entities included in the organisation's sustainability reporting | 4, 47     |
| GRI 2        | 2-3    | Reporting period, frequency and contact point                    | 4         |
| GRI 2        | 2-4    | Restatements of information                                      | -         |
| GRI 2        | 2-5    | External assurance   | Annex IV  |
| GRI 2        | 2-6    | Activities, value chain and other business relationships         | 6-21      |
| GRI 2        | 2-7    | Employees  | 69-79     |
| GRI 2        | 2-9    | Governance structure and composition                             | 46        |
| GRI 2        | 2-15   | Conflicts of interest  | 49-51     |
| GRI 2        | 2-22   | Statement on sustainable development strategy                    | 23-25     |
| GRI 2        | 2-23   | Values, principles, norms, and code of conduct                   | 11, 49-52 |
| GRI 2        | 2-26   | Mechanisms for seeking advice and raising concerns               | 48        |
| GRI 2        | 2-28   | Membership associations  | 81-83     |
| GRI 2        | 2-29   | Approach to stakeholder engagement                               | 24-25     |
| GRI 2        | 2-30   | Collective bargaining agreements                                 | 121       |
| GRI 3        | 3-1    | Process to determine material topics                             | 25        |
| GRI 3        | 3-2    | List of material topics  | 25        |

| GRI Standard                                     | Number | Contents   | Page   |
|--|--------|--|--|
| <b>Material aspect: Economic performance</b>     |        |  |  |
| GRI 3  | 3-3    | Management of material topics  | 29   |
| GRI 201  | 201-1  | Direct economic value generated and distributed                                    | 29-38  |
| GRI 201  | 201-2  | Financial implications and other risks and opportunities related to climate change | 39   |
| GRI 201  | 201-4  | Financial assistance received from the government                                  | 97   |
| <b>Material aspect: Economic performance</b>     |        |  |  |
| GRI 3  | 3-3    | Management of material topics  | 46-78  |
| GRI 202  | 202-2  | Market presence  | 29-37  |
| <b>Material aspect: Indirect Economic Impact</b> |        |  |  |
| GRI 3  | 3-3    | Management of material topics  | 23   |
| GRI 203  | 203-2  | Significant indirect Economic Impacts  | 23-27  |
| <b>Material aspect: Procurement practices</b>    |        |  |  |
| GRI 3  | 3-3    | Management of material topics  | 86   |
| GRI 203  | 204-1  | Proportion of spending on local suppliers  | 86-87  |
| <b>Material aspect: Anti-corruption</b>          |        |  |  |
| GRI 3  | 3-3    | Management of material topics  | 49-50  |
| GRI 205  | 205-2  | Communication and training on anti-corruption policies and procedures              | At year end, 30.49% of the staff had completed training in the Code of Ethics and anticorruption |

| GRI Standard                                | Number | Contents  | Page      |
|---|--------|---|-----------|
| <b>Material aspect: Tax</b>                 |        |   |           |
| GRI 3                                       | 3-3    | Management of material topics                           | 29        |
| GRI 207                                     | 207-4  | Country-by-country reporting                            | 37        |
| <b>Material aspect: Materials</b>           |        |   |           |
| GRI 3                                       | 3-3    | Management of material topics                           | 58-59, 62 |
| GRI 301                                     | 301-2  | Recycled input materials used                           | 62        |
| GRI 301                                     | 301-3  | Reclaimed products and their packaging materials        | 62        |
| <b>Material aspect: Energy</b>              |        |   |           |
| GRI 3                                       | 3-3    | Management of material topics                           | 58-59, 63 |
| GRI 302                                     | 302-1  | Energy consumption within the organisation              | 63        |
| <b>Material aspect: Water and effluents</b> |        |   |           |
| GRI 3                                       | 3-3    | Management of material topics                           | 58-59, 64 |
| GRI 304                                     | 303-5  | Water consumption                                       | 64        |
| <b>Material aspect: Emissions</b>           |        |   |           |
| GRI 3                                       | 3-3    | Management of material topics                           | 65-67     |
| GRI 305                                     | 305-1  | Direct greenhouse gas (GHG) emissions (Scope 1)         | 66        |
| GRI 305                                     | 305-2  | Indirect greenhouse gas (GHG) emissions (Scope 2)       | 66        |
| GRI 305                                     | 305-3  | Other indirect greenhouse gas (GHG) emissions (Scope 3) | 66        |
| GRI 305                                     | 305-5  | Reduction of GHG emissions                              | 67        |

| GRI Standard  | Number | Contents   | Page                       |
|---|--------|--|----------------------------|
| <b>Material aspect: Waste</b>                             |        |  |                            |
| GRI 3   | 3-3    | Management of material topics  | 58-59, 60                  |
| GRI 306   | 306-2  | Management of significant waste-related impacts  | 60                         |
| GRI 306   | 306-3  | Waste generated  | 60                         |
| <b>Material aspect: Supplier Environmental Assessment</b> |        |  |                            |
| GRI 3   | 3-3    | Management of material topics  | 86-87                      |
| GRI 308   | 308-1  | New suppliers that were screened and selected using environmental criteria                           | 86-87                      |
| <b>Material aspect: Employment</b>                        |        |  |                            |
| GRI 3   | 3-3    | Management of material topics  | 69-72                      |
| GRI 401   | 401-2  | Benefits provided to full-time employees that are not provided to temporary or part-time employees   | 71-72                      |
| GRI 401   | 401-3  | Parental leave   | 72                         |
| <b>Material aspect: Labour/management relations</b>       |        |  |                            |
| GRI 3   | 3-3    | Management of material topics  | 72                         |
| GRI 3   | 402-1  | Minimum notice periods regarding operational changes   | There is no defined period |
| <b>Tema material: Occupational health and safety</b>      |        |  |                            |
| GRI 3   | 3-3    | Management of material topics  | 72-74                      |
| GRI 403   | 403-2  | Hazard identification, risk assessment, and incident investigation                                   | 72-74                      |
| GRI 403   | 403-7  | Prevention and mitigation of occupational health and safety impacts linked by business relationships | 74                         |
| GRI 403   | 403-9  | Work-related injuries  | 74                         |
| GRI 403   | 403-10 | Work-related ill health  | 74                         |

| GRI Standard | Number | Contents | Page |
|--------------|--------|----------|------|
|--------------|--------|----------|------|

#### Material aspect: Training and development\*

|         |       |   |       |
|---------|-------|---|-------|
| GRI 3   | 3-3   | Management of material topics                           | 76-77 |
| GRI 404 | 404-1 | Average hours of training per year per employee         | 96    |
| GRI 404 | 404-2 | Programmes for upgrading employee skills and transition | 76-77 |

#### Material aspect: Diversity and equal opportunities

|         |       |  |        |
|---------|-------|--|--------|
| GRI 3   | 3-3   | Management of material topics                          | 78-79  |
| GRI 405 | 405-1 | Diversity of governance bodies and employees           | 46, 70 |
| GRI 405 | 405-2 | Ratio of basic salary and remuneration of women to men | 95     |

#### Material aspect: Non-discrimination

|         |       |  |  |
|---------|-------|--|--|
| GRI 3   | 3-3   | Management of material topics                            | 78-79  |
| GRI 406 | 406-1 | Incidents of discrimination and corrective actions taken | No cases of discrimination were detected during the period subject to the report |

#### Material aspect: Freedom of association and collective bargaining

|       |     |                               |    |
|-------|-----|-------------------------------|----|
| GRI 3 | 3-3 | Management of material topics | 75 |
|-------|-----|-------------------------------|----|

#### Material aspect: Child labour

|       |     |                               |    |
|-------|-----|-------------------------------|----|
| GRI 3 | 3-3 | Management of material topics | 52 |
|-------|-----|-------------------------------|----|

#### Material aspect: Forced or compulsory labour

|       |     |                               |    |
|-------|-----|-------------------------------|----|
| GRI 3 | 3-3 | Management of material topics | 52 |
|-------|-----|-------------------------------|----|

#### Material aspect: Evaluation of human rights

|         |       |   |    |
|---------|-------|---|----|
| GRI 3   | 3-3   | Management of material topics   | 52 |
| GRI 412 | 412-1 | Operations that have been subject to human rights reviews or impact assessments | 52 |

| GRI Standard | Number | Contents | Page |
|--------------|--------|----------|------|
|--------------|--------|----------|------|

#### Material aspect: Local communities

|         |       |  |       |
|---------|-------|--|-------|
| GRI 3   | 3-3   | Management of material topics  | 81    |
| GRI 413 | 413-1 | Operations with local community engagement, impact assessments, and development programmes | 81-83 |

#### Material aspect: Supplier social assessment

|         |       |  |       |
|---------|-------|--|-------|
| GRI 3   | 3-3   | Management of material topics                          | 86-87 |
| GRI 414 | 414-1 | New suppliers that were screened using social criteria | 86-87 |

#### Material aspect: Customer health and safety

|       |     |                               |       |
|-------|-----|-------------------------------|-------|
| GRI 3 | 3-3 | Management of material topics | 84-85 |
|-------|-----|-------------------------------|-------|

#### Material aspect: Customer privacy

|         |     |  |    |
|---------|-----|--|----|
| GRI 3   | 3-3 | Management of material topics  | 85 |
| GRI 418 | 418 | Substantiated complaints concerning breaches of customer privacy and losses of customer data | 85 |



## ii. Integrated Report

|   | Contents   | Aspects   | Page     |
|---|--|---|----------|
| <b>Organisational overview and external environment</b> | What does the organisation do and what are the circumstances under which it operates?  | Culture, ethics, and values   | 11-12    |
|   |  | Ownership and operating structure   | 4, 6, 47 |
|   |  | Principal activities and markets  | 6-7      |
|   |  | Competitive landscape and market positioning  | 6-7      |
|   |  | Position within the value chain   | 6-7      |
|   |  | Key quantitative information  | 8-10     |
|   |  | Significant factors affecting the external environment.   | 7        |
|   |  | Leadership structure, including the skills and diversity.   | 46-47    |
| <b>Governance</b>                                       | How does the organisation's government structure support its ability to create value in the short, medium, and long term?  | Specific processes used to make strategic decisions.  | 46       |
|   |  | How the organisation's culture, ethics and values are reflected in its use of the effects on the capitals | 7        |
|   |  | The responsibility those charged with governance take for promoting and enabling innovation               | 46       |
| <b>Business model</b>                                   | What is the organisation's business model?   | Inputs  | 7        |
|   |  | Business activities   | 6        |
|   |  | Outputs   | 7        |
|   |  | Results   | 7        |
| <b>Risks and opportunities</b>                          | What are the specific risks and opportunities that affect the organisation's ability to create value over the short, medium, and long term, and how is the organisation dealing with them? | Key risks and opportunities that are specific to the organisation   | 48       |

|  | Contents   | Aspects  | Page         |
|--|--|--|--------------|
| <b>Strategy and resource allocation</b>      | Where does the organisation want to go and how does it intend to get there?  | <b>The organisation's approach to any real risks (whether they be in the short, medium, or long term) that are fundamental to the ongoing ability of the organisation to create value.</b> | <b>23</b>    |
|  |  | Strategic plans and objectives   | <b>11-14</b> |
| <b>Performance</b>                           | To what extent has the organisation achieved its strategic objectives for the period and what are its outcomes in terms of effects on the capitals?  | Quantitative information   | <b>8-10</b>  |
|  |  | Effects on capitals  | <b>8-10</b>  |
|  |  | Stakeholder engagement   | <b>24</b>    |
| <b>Outlook</b>                               | What challenges and uncertainties is the organisation likely to encounter in pursuing its strategy, and what are the potential implications for its business model and future performance? | <b>The organisation's expectations about the external environment.</b>   | <b>23-25</b> |
| <b>Basis of preparation and presentation</b> | How does the organisation determine what matters to include in the integrated report and how are such matters quantified or evaluated?   | <b>Mechanisms for addressing challenges and opportunities</b>  | <b>23</b>    |
|  |  | <b>Materiality</b>   | <b>25</b>    |
|  |  | <b>Limits</b>  | <b>26-27</b> |
|  |  | <b>Frameworks</b>  | <b>7, 26</b> |

### iii. Law 11/2018

| General areas                             | Reporting framework  | Page / Reference   |                 |
|---|--|--|-----------------|
| <b>Business model, Policies and Risks</b> | <b>Business environment</b>  | <b>6, 10</b>   |                 |
|   | <b>Markets in which it operates</b>                                    | No GRI, operational context (economic and sectoral)          | <b>6</b>        |
|   | <b>Main factors and trends that may affect its future development</b>  |  | <b>6, 7</b>     |
|   | <b>Organisation and structure</b>                                      | 2-1 Details of the organisation                              | <b>4</b>        |
|   | <b>Objectives and strategies</b>                                       | No GRI, objectives and strategies                            | <b>7, 15-16</b> |
|   | <b>Description of the policies applied by the company</b>              | 2-23 Values, principles, norms, and code of conduct          | <b>49-50</b>    |
|   | <b>Results of the policies applied by the company</b>                  | 2-24 Incorporation of political commitments                  | <b>8,9</b>      |
|   | <b>Main risks related to questions linked the company's activities</b> | -  | <b>48</b>       |
|   | <b>Reporting framework used</b>  | GRI  | <b>4</b>        |
|   | <b>Materiality analysis</b>  | 3-3 Management of material topics                            | <b>25</b>       |
| Environmental questions                   | Reporting framework  | Page / Reference   |                 |
| <b>Environmental management</b>           | <b>Real and foreseeable effects of the company's operations</b>        | 307-1 Non-compliance with environmental laws and regulations | <b>58</b>       |
|   | <b>Environmental evaluation or certification procedures</b>            | -  | <b>58</b>       |
|   | <b>Resources allocated to environmental risk prevention</b>            | -  | <b>58</b>       |
|   | <b>Application of the principle of precaution</b>                      | 3-3 Management of material topics                            | <b>58</b>       |
|   | <b>Quantity of provisions and guarantees for environmental risks</b>   |  | <b>58</b>       |

Eventhough, due to the type of activity of Holaluz, the company is exempt from the application of Law 26/2007 on Environmental Liability; Holaluz Clidom, S.L., as the parent company of the Holaluz Group, has civil liability coverage guarantees for sudden and accidental pollution of land, air, and water, amounting to 5 million euros, which are applicable to our entire business.  
On the other hand, Katae Energia, S.L. whose activity is the logistical storage and installation of solar panels is also covered for public liability for accidental pollution to 1.2 million euros.



| Environmental matters                                |   | Reporting framework  | Page / Reference  |
|--|---|--|---|
| Pollution  | Measures for preventing, reducing, and repairing carbon emissions (including noise and light pollution) | -  | Holaluz conducts its activities in urban and industrial areas, where the activities do not breach the sound levels permitted in all areas where its facilities are located.<br>None of the activities conducted by Holaluz create light pollution since its work takes place in all establishments during daylight hours, which does not cause a nuisance to the surroundings.<br>As regards atmospheric pollution, Holaluz has no emission sources or production processes that generate direct emissions into the atmosphere. |
|  |   |  |   |
| Circular economy and waste prevention and management | Measures for prevention, recycling, reuse, other forms of recovery and disposal of waste                | 301-2 Recycled input materials used  | 59-61, 89   |
| Circular economy and waste prevention and management | Actions to address food waste   | 306-2 Management of significant waste-related impacts                                | Due to the company's activity, food waste is not significant and, therefore, food waste prevention is not considered a material aspect.   |
| Sustainable Use of Resources                         | Water consumption and water supplies according to local limitations                                     | 303-1 Interactions with water as a shared resource                                   | 64, 90  |
| Sustainable Use of Resources                         | Consumption of raw materials  | 301-1 Materials used by weight or volume   | 62, 90  |
|  | Measures adopted to improve their use   | -  | 62  |
| Sustainable Use of Resources                         | Direct and indirect energy consumption  | 302-1 Energy consumption within the organisation (MWh)                               | 63, 90  |
|  | Measures taken to improve energy efficiency   | 302-4 Reduction of energy consumption  | 63  |
|  | Use of renewable energies   | 302-1 Energy consumption within the organisation (MWh)                               | 63  |
| Climate change                                       | Important elements of generated greenhouse gas emissions  | 201-2 Financial implications and other risks and opportunities due to climate change | 66  |
|  |   | 305-1 Direct (Scope 1) GHG emissions   | 66  |
|  |   | 305-2 Energy indirect (Scope 2) GHG emissions  | 66  |
|  |   | 305-3 305-3 Other indirect (Scope 3) GHG emissions                                   | 66  |
|  |   | 305-4 305-4 GHG Emissions Intensity  | 66  |

| Environmental matters        |  | Reporting framework   | Page / Reference  |
|------------------------------|--|---|---|
| Climate change               | Measures adopted to adapt to the consequences of climate change  | 201-2 Financial implications and other risks and opportunities for the Organization's activities due to climate change                          | 67  |
|                              | Voluntary reduction goals  | 305-5 Reduction of GHG emissions  | 67  |
| Protection of biodiversity   | Measures taken to conserve or restore biodiversity   | -   | Holaluz's operations do not take place in areas close to protected areas of adjacent to areas with high biodiversity or with the existence of protected species. This means that the need to preserve or restore these habitats is not significant to the organisation's operations.        |
|                              | Impacts caused by the activities or operations in protected areas                                      | 304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas |   |
| Social and personnel matters |  | Reporting framework   |   |
| Employees                    | Total number and breakdown of employees by sex, age, country, and professional category                | 2-7 Employees   | 70, 91  |
|                              |  | 405-1 Diversity of governance bodies and employees  | 46, 70  |
|                              | Total number and breakdown of types of work contract   | 2-7 Employees   | 71, 92  |
|                              | Annual average of permanent, temporary, and part-time contracts by sex, age, and professional category | 2-7 Employees   | 93  |
|                              | Number of dismissals by sex, age, and professional category  | -   | 94  |
|                              | Salary gap   | 405-2 Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation              | 95  |
|                              | Average remuneration by sex, age, and professional category  | 2-19 Remuneration policies  | 71, 95  |
|                              | Average remuneration of the directors by sex   | -   | 95  |
|                              | Average remuneration of the managers by sex  | -   | 95  |
|                              | Implementation of 'right to disconnect' policies   | -   | Holaluz has a Right to Disconnect policy which contains a set of guidelines and recommendations to ensure that outside working hours and when absent from work for any reason, on days off and/or holidays, employees are able to rest, and their personal and family privacy is respected. |
| Differently abled employees  | 405-1 Diversity of governance bodies and employees   |   |   |
|                              |  |   | 78-79, 94   |

| Social and personnel matters |   | Reporting framework  | Page / Reference   |
|------------------------------|---|--|--|
| Work organisation            | Work time organisation  | -  | 72-73  |
|                              | Number of absent hours  | 403-9 Work-related injuries  | 73   |
|                              | Measures allocated to facilitate work-life balance and promote coparenting                                  | -  | 73   |
| Health and Safety            | Occupational health and safety conditions   | 403-1 Occupational health and safety   | Holaluz does not have an occupational health and safety committee and during the period covered by the report no risks have arisen that have caused or contributed to professional illnesses. The entire team, except for members of the board, are covered by the health system, representing 99% of the staff at year end.   |
|                              |   | 403-2 Hazard identification, risk assessment, and incident investigation   | 74   |
|                              |   | 403-3 Occupational health services   | 74   |
|                              |   | 403-5 Worker training on occupational health and safety  | 74   |
|                              |   | 403-6 Promotion of Worker Health   | 74   |
|                              |   | 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships  | 74   |
| Health and Safety            | Number of work accidents and occupational illnesses by sex, rate of frequency and seriousness by sex        | 403-9 Work-related injuries  | During the reporting period, there were no risks that caused or contributed to cause occupational diseases, as in the previous year.   |
|                              | Organisation of the social dialogue   | 403-10 Occupational diseases and illnesses   | 75   |
| Social relationships         | Percentage of employees covered by collective bargaining agreements by country                              | 402-1 Minimum notice periods regarding operational changes   | The entire team, except for the persons in the position of director, is covered by the collective bargaining agreement, which represents 99% of the workforce at the end of the year. The entire workforce is located in Spain.  |
|                              | Balance of the collective bargaining agreements, particularly in the area of occupational health and safety | 403-1 Workers representation in formal joint management-worker health and safety committees  | Holaluz has the following mechanisms and procedures to promote worker involvement in the company management:<br>There is a weekly meeting to which the entire team is invited to inform them of the company's progress, the status of active projects and all relevant information. In the framework of this meeting, we have established a forum that allows the team to pose questions and express their opinions both in situ and online. These matters are dealt with immediately or, if not possible, within the same week. |
|                              |   | The company's mechanisms and procedures to encourage the involvement of workers in the management of the company in terms of information, consultation, and participation. |  |



| Social and personnel matters        |  | Reporting framework   | Page / Reference |
|-------------------------------------|--|---|------------------|
| Training                            | Training policies implemented  | 404-2 Programs for upgrading employee skills and transition assistance programs | 76-77            |
|                                     | Total number of hours of training by professional category.  | 404-1 - Average hours of training per year per employee                         | 96               |
| Diversity                           | Universal accessibility for differently abled people   | 405-1 Diversity of governance bodies and employees                              | 78               |
| Equity                              | Measures adopted to promote equal treatment and opportunities for women and men  | -   | 78               |
|                                     | Equity plans adapted to promote employment, protocols against sexual and gender-based harassment   | 405-1 Diversity of governance bodies and employees                              | 78               |
|                                     | Policy against all types of discrimination and, in the event, diversity management   | 406-1 Incidents of discrimination and corrective actions taken                  | 78               |
| Respect for human rights            |  | Reporting framework   | Page / Reference |
| Human rights                        | Prevention of the risks of violating human rights and, if any, measures to mitigate, manage and repair possible abuses   | 3-3 Management of material issues   | 52               |
|                                     | Application of due diligence procedures in matters of human rights   | 2-23 Political commitments  | 52               |
|                                     | Complaints in cases of violations of human rights  | 406-1 Cases of discrimination and corrective actions taken                      | 52               |
|                                     | Promotion and enforcement of the provisions of the ILO core conventions relating to respect for freedom of association and the right to collective bargaining, the elimination of discrimination in employment and occupation, the elimination of forced or compulsory labour and the effective abolition of child labour. | 3-3 Management of material issues   | 52               |
| Fight against corruption and fraud. |  | Reporting framework   | Page / Reference |
| Bribery and corruption              |  | 2-23 Political commitments  | 50-51            |
|                                     | Measures adopted to prevent bribery and corruption   | 2-26 Mechanisms for seeking advice and raising concerns                         | 50-51            |
|                                     |  | 205-1 Operations assessed for risks related to corruption                       | 50-51            |
|                                     | Measures to fight against money laundering   | 205-2 Communication and training on anti-corruption policies and procedures     | 98               |
|                                     | Contributions to foundations and non-profit organisations  | 201-1 Direct economic value generated and distributed                           | 9                |

| Information about the company                              |   | Reporting framework  | Page / Reference |
|--|---|--|------------------|
| <b>The company's commitment to sustainable development</b> | The company's activity's impact on employment and local development   | 413-1 Operations with local community engagement, impact assessments, and development programs             | 81-83            |
|  |   | 201-1 Direct economic value generated and distributed  | 81               |
|  | The company's activity's impact on local populations and in the territory                                   | 413-2 Significant operations with significant negative impacts - real and potential - in local communities | 81-83            |
|  | Relations maintained with stakeholders in local communities and ways of dialoguing with them                | 2-29 Approach to stakeholder engagement  | 81-83            |
| <b>Subcontracting and suppliers</b>                        | Partnership or sponsorship actions  | 413-1 Operations with local community engagement, impact assessments, and development programs             | 81-83            |
|  | Inclusion of social questions in the procurement, gender equity and environmental policy                    | 308-1 New suppliers that were screened using environmental criteria  | 86-87            |
|  | Consideration of social and environmental responsibility in relationships with suppliers and subcontractors | 414-1 New suppliers that were screened using social criteria   | 86-87            |
| <b>Consumers</b>   | Oversight systems, audits, and their results  | 308-2 Negative environmental impacts in the supply chain and actions taken                                 | 86-87            |
|  | Consumer health and safety measures   | 416-1 Assessment of the health and safety impacts of product and service categories                        | 84-85            |
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| <b>Tax information</b>                                     | Complaints received and resolved  | 416-2 - Incidents of noncompliance concerning the health and safety impacts of products and services       | 96               |
|  | Profits earned country by country   | 201-1 Direct economic value generated and distributed  | 37               |
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| EU Taxonomy  |   | -  | 99-12            |
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**Independent Verification Report of the Consolidated Non-Financial  
Information Statement for the year ended  
December 31, 2022**

**HOLALUZ-CLIDOM, S.A. AND DEPENDENT COMPANIES**







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*Translation of a report originally issued in Spanish. In the event of discrepancy,  
the Spanish-language version prevails*

## **INDEPENDENT VERIFICATION REPORT OF THE CONSOLIDATED STATEMENT OF NON-FINANCIAL INFORMATION**

To the shareholders of Holaluz-Clidom, S.A.:

In accordance with article 49 of the Commercial Code, we have carried out the verification, with the scope of limited security, of the attached Consolidated Non-Financial Information Statement (hereinafter EINF) corresponding to the annual year ended December 31, 2022, of Holaluz-Clidom, S.A. and subsidiaries (hereinafter, the Group) that is part of the Group's Consolidated Management Report.

The content of the EINF includes additional information to that required by current commercial regulations on non-financial information that has not been the subject of our verification work. In this sense, our work has been limited exclusively to the verification of the information identified in the annex "Table of contents - Law 11/2018" included in the attached EINF.

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### **Responsibility of Directors**

The formulation of the EINF included in the Group's Consolidated Management Report, as well as its content, is the responsibility of the Directors of Holaluz-Clidom, S.A. The EINF has been prepared in accordance with the contents included in the current commercial regulations and following the criteria of the *Sustainability Reporting Standards of the Global Reporting Initiative* (GRI standards) selected, as well as those other criteria described according to what is mentioned for each subject in the annex "Table of contents - Law 11/2018" of the aforementioned State.

This responsibility also includes the design, implementation and maintenance of such internal control as is deemed necessary to enable the EINF to be free from material misstatement due to fraud or error.

The administrators of Holaluz-Clidom, S.A. are also responsible for defining, implementing, adapting and maintaining the management systems from which the necessary information is obtained for the preparation of the EINF.

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### **Our independence and quality control**

We have complied with the independence and other ethics requirements of the International Code of Ethics for Professional Accountants (including the International Standards on Independence) issued by the International Ethics Standards Board for Professional Accountants (IESBA) which is based on the fundamental principles of integrity, professional objectivity, competence and diligence, confidentiality and professional behaviour.

Our firm applies the international quality standards in force and maintains, consequently, a quality system that includes policies and procedures related to compliance with ethical requirements, professional standards and applicable legal and regulatory provisions.

The work team has been formed by expert professionals in reviews of Non-Financial Information and, specifically, in economic, social and environmental performance information.




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## Our responsibility

It is our responsibility to express our findings in an independent verification report of limited safety based on the work done. We have carried out our work in accordance with the requirements set out in the current Revised International Standard for Assurance Engagements 3000, "Assurance Engagements Other Than Auditing or Historical Financial Information Review" (NIEA 3000 Revised) issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and with the Action Guidance on State Assurance Assignments Non-Financial Information issued by the Institute of Chartered Accountants of Spain.

In limited safety work the procedures carried out vary in their nature and time of performance, and are of a lesser extent, than those carried out in reasonable safety work and, therefore, the safety obtained is substantially lower.

Our work has consisted of the formulation of questions to the Management, as well as to the various units of the Group that have participated in the elaboration of the EINF, in the review of the processes to collect and validate the information presented in the EINF and in the application of certain analytical procedures and sample review tests described below:

- ▶ Meetings with Group staff to learn about the business model, policies and management approaches applied, the main risks related to these issues and obtain the necessary information for the external review.
- ▶ Analysis of the scope, relevance and integrity of the contents included in the EINF for the year 2022 based on the materiality analysis carried out by the Group and described in section 2.2 "Materiality analysis", considering contents required in the commercial regulations in force.
- ▶ Analysis of the processes to collect and validate the data presented in the EINF of the financial year 2022.
- ▶ Review of the information related to the risks, policies and management approaches applied in relation to the material aspects presented in the EINF of the financial year 2022.
- ▶ Verification, through tests, based on the selection of a sample, of the information related to the contents included in the EINF of the financial year 2022 and its adequate compilation from the data provided by the sources of information.
- ▶ Obtaining a letter of representations from the Administrators and the Management.

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## Paragraph of emphasis

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment lays down an obligation to disclose information on how and to what extent the undertaking's activities are associated with economic activities aligned in relation to climate change mitigation and adaptation objectives for the first time for the financial year 2022, in addition to information regarding eligible activities. Regarding this last information on eligibility, the Company also reports it for the first time for the year 2022. Consequently, no comparative information on eligibility or alignment has been included in the attached EINF. Additionally, it should be noted that the administrators of Holaluz-Clidom, S.A. have incorporated information on the criteria that, in their opinion, best allow compliance with the aforementioned obligations and that are defined in Annex II "Taxonomy and climatic risks" of the attached EINF. Our conclusion has not changed on this issue.



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## Conclusion

Based on the procedures carried out in our verification and the evidence we have obtained, no aspect has been revealed that would lead us to believe that the Group's EINF for the year ended December 31, 2022 has not been prepared, in all its material aspects, in accordance with the contents set out in current commercial regulations and following the criteria of the selected GRI standards, as well as those other criteria described according to what is mentioned for each subject in the annex "Table of contents - Law 11/2018" of the aforementioned State.

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## Use and distribution

This report has been prepared in response to the requirement established in the commercial regulations in force in Spain, so it may not be suitable for other purposes and jurisdictions.

ERNST & YOUNG, S.L.  
(Signature on the original in Spanish)

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Antonio Capella Elizalde

April 25, 2023





# holaluz

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