



SUSTAINABILITY & ESG POLICY

OCEAN WINDS OFFSHORE S.L.

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1. PURPOSE

Ocean Winds Offshore S.L. (hereinafter “OW” or “the Company”) is committed to developing, constructing, and operating offshore wind energy projects in a sustainable, safe, and responsible manner. This Sustainability & ESG Policy defines our commitments to environmental protection, social responsibility, ethical business conduct, and continuous improvement.

As a renewable energy company, we recognize our responsibility to contribute to the global energy transition while minimizing environmental impacts and creating long-term value for stakeholders.

This Policy supports compliance with:

- ISO 14001 Environmental Management Systems
- Applicable environmental and maritime regulations
- Relevant human rights, labour, and governance requirements
- Sustainability reporting, greenhouse gas management and materiality assessment processes aligned with recognised sustainability disclosure frameworks

2. SCOPE

This Policy applies to:

- All Company activities, including project development, engineering and construction, operations and maintenance, procurement and supply chain activities and decommissioning activities
- All employees, contractors, suppliers, and business partners working on behalf of the Company
- All entities, business units and joint ventures/projects (development, construction, and operations) where Ocean Winds has the responsibility and accountability for the management and operational decisions of the joint venture/project

3. COMMITMENTS

3.1. Environmental commitments

The Company is committed to protecting the environment and preventing pollution throughout the lifecycle of our offshore wind projects with the following principles:

- Identify and manage environmental risks, opportunities and impacts associated with our activities
- Comply with applicable environmental laws, permits, and other compliance obligations
- Protect marine ecosystems by avoiding, minimizing and mitigating adverse environmental impacts
- Minimize waste generation and apply the waste hierarchy to waste management, prioritizing prevention, preparation for reuse, recycling, and other forms of recovery over elimination or landfill disposal
- Promote responsible and efficient use of raw materials, resources, materials, products, and components acquired and used by the organization in line with circular economy principles
- Measure, monitor and reduce greenhouse gas emissions and improve energy efficiency where feasible
- Consider climate-related risks and opportunities in project and business decisions
- Prevent spills, leaks, and environmental incidents of hazardous substances
- Mitigate the negative effects associated with air, water and soil pollution by applying the principles of precaution and prevention to avoid and reduce pollution
- Establish the necessary measures to prevent incidents and emergency situations that cause pollution. If an incident occurs, control and limit their impact on people and the environment
- Consider environmental impacts during project planning, construction, operation, and decommissioning
- Establish environmental objectives and monitor performance
- Conduct periodic reviews, audits, and corrective actions
- Promote continual improvement of our Environmental Management System and ESG performance

3.2. Social responsibility commitments

The Company is committed to maintaining safe, fair, and inclusive working environments and to engaging responsibly with stakeholders with the following principles:

- Provide safe and healthy working conditions for employees and contractors
- Promote a strong safety culture and effective risk management
- Respect internationally recognized human rights

- Prohibit discrimination, harassment, forced labour, and child labour
- Promote diversity, equality, and inclusion
- Engage openly with communities, regulators, suppliers, and other stakeholders
- Respect the rights, interests and values of communities and stakeholders potentially affected by our activities
- Support local employment and responsible economic development where possible
- Encourage suppliers and contractors to adopt responsible ESG practices

3.3. Governance and ethics

The Company is committed to conducting business with integrity, transparency, and accountability with the following principles:

- Comply with all applicable laws and regulations
- Maintain zero tolerance for bribery, corruption, and unethical conduct
- Promote transparent reporting and responsible decision-making
- Integrate sustainability considerations into governance, risk management and business decision-making processes
- Monitor environmental performance and compliance
- Define clear ESG responsibilities within the organization.
- Provide appropriate training and awareness on sustainability, environmental, and ethical matters
- Maintain processes for reporting concerns and nonconformities

4. RESPONSIBILITIES

Management is responsible for implementing this Policy and ensuring adequate resources are available.

Employees, contractors, and suppliers are expected to:

- Comply with this Policy and applicable procedures
- Act responsibly and ethically
- Report environmental, safety, or compliance concerns
- Contribute to continuous improvement initiatives