

PROFESSIONAL SELECTION AND HIRING POLICY

BRUC

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1. INTRODUCTION

Bruc Energy, S.L. and the companies of its business group (“BRUC” or the “Group”), aware that the creation of value in an ethical and sustainable manner constitutes one of its core values and that without the support of a qualified, diverse and motivated team it would not be possible to achieve the Group’s strategic goals, manifest their commitment to diversity and equal opportunities, as well as to transparency, impartiality and objectivity in attracting and retaining talent.

For this reason, and in line with the Code of Conduct, the Group’s Diversity Policy, the Sustainable Development Goals (SDGs), current applicable legislation and best professional practices, BRUC publishes this policy for the selection and recruitment of professionals (the “Policy”), which aims to establish a comprehensive framework for the selection and recruitment of personnel that guarantees the attraction, selection and retention of the most suitable talent for BRUC, ensuring equal opportunities and diversity at all levels of the organization.

2. SCOPE OF APPLICATION

This Policy is applicable to all the companies that make up the Group, as well as to the investee companies not integrated in the Group over which BRUC has effective control, within the legally established limits. In those investee companies in which this Policy is not applicable, BRUC will promote, through its representatives in its administrative bodies, the alignment of its own policies with this Policy. In addition, this Policy is applicable, as appropriate, to joint ventures, temporary joint ventures and other equivalent associations, when BRUC assumes their management.

The Policy applies to all processes for the selection and hiring of professionals for permanent, temporary and internship positions. It includes procedures for internal hiring, external hiring and hiring through the use of recruitment agencies (the “Headhunter” or “Headhunters”), to whom the Policy applies.

3. PRINCIPLES OF ACTION

These principles guide all stages of BRUC’s professional selection and hiring process, forming the basis for an ethical, inclusive and effective hiring process, aligned with the Group’s values and objectives and which not only meets BRUC’s needs, but also contributes to the development of a more equitable and just society.

3.1. EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

BRUC treats all participants (the “Candidate” or “Candidates”) in its selection and hiring processes equally, without any discrimination, directly or indirectly, on the basis of race, gender, age, religion, sexual orientation, gender identity, disability, marital status, nationality, or any other condition.

3.2. TRANSPARENCY

BRUC intends to make the selection and hiring process as clear and as understandable for all Candidates, from the publication of the vacancy to the final hiring decision.

BRUC strives to provide Candidates with clear communication, an efficient process and a reliable infrastructure throughout the selection and hiring process. During this process, BRUC communicates the Group’s purpose and values and addresses any concerns raised by Candidates.

3.3. CONFIDENTIALITY

Personal and professional information provided by Candidates is treated with the highest level of confidentiality and privacy.

Candidates' data will be used only for purposes related to the selection and hiring process, complying with all applicable regulations on personal data protection. Only BRUC authorized personnel has access to this information.

3.4. IMPARTIALITY

All BRUC's hiring decisions are based on objective and fair criteria, without the influence of particular interests, favored treatment, personal relationships or biases of any kind.

3.5. MERITOCRACY

The Group's hiring decisions are based exclusively on merit and ability criteria, evaluating Candidates based on their knowledge, skills, abilities and competencies to perform the job effectively.

3.6. DIVERSITY AND INCLUSION

BRUC is committed to fostering a work environment that values diversity in all its forms and promotes the inclusion of people from different backgrounds, experiences and perspectives.

3.7. LEGAL AND REGULATORY COMPLIANCE

All of BRUC's selection and hiring processes comply with applicable laws and regulations related to labor, equal opportunity and non-discrimination.

3.8. CONTINUOUS EVALUATION

BRUC's selection and hiring process is subject to continuous evaluation to identify areas for improvement and ensure compliance with established principles.

3.9. SOCIAL RESPONSIBILITY

BRUC assumes its responsibility to promote social welfare, including the creation of employment opportunities that benefit the community and contribute to economic and social development.

BRUC supports fair employment policies and contributes to the improvement of the social environment through responsible hiring practices. In this sense, BRUC is committed to promote employment stability through permanent contracts, as far as possible, and to present to the Candidates a valuable, attractive and comprehensive employment proposal, based on equal opportunities, diversity and inclusion, and composed of a competitive remuneration, professional development, a safe and healthy work environment while facilitating the reconciliation of personal and work life, ensuring that the experience of the Candidates throughout the selection and hiring process and in their subsequent integration into the Group is satisfactory.

4. SELECTION PROCESS

4.1. IDENTIFICATION OF NEEDS

Once a recruitment need has been identified, the department whose vacancy is to be filled (the “Responsible of the Vacancy”) will define the job profile.

The job description will include responsibilities, competencies, required experience and any relevant additional qualifications, ensuring that it does not contain discriminatory requirements and is inclusive and accessible to all, eliminating any barriers that could exclude candidates and avoiding any conscious or unconscious bias.

The vacancy must be approved by BRUC's Chief Executive Officer and, failing that, by the Human Resources Department (“HR”). Prior to publication, the ESG department will verify that the job description complies with the Code of Conduct, BRUC's Diversity Policy and this Policy.

4.2. SELECTION STRATEGY

Once the vacancy is approved, a recruitment strategy will be developed to ensure an inclusive process. This includes posting the vacancy on platforms that reach diverse demographics and using inclusive language in job descriptions.

BRUC may use Headhunters, ensuring that these entities comply with equality and non-discrimination regulations as well as this Policy.

Headhunters shall be informed of BRUC's policies on gender equality, inclusion and diversity, and shall be required to adhere to these guidelines in writing, as described in Item 6 of this Policy.

4.3. PUBLICATION OF THE VACANCY

Vacancies may be advertised internally and externally, ensuring that a broad spectrum of Candidates is reached. This may include the use of job portals, social networks, universities and specialized platforms, both by BRUC and Headhunters.

4.4. RECEPTION AND FILTERING OF APPLICATIONS

HR or the Headhunter in charge of the selection process will receive all the applications and will make a first filtering based on the minimum requirements of the position, being able to make a first contact with the Candidates.

During the selection process, all decisions will be based exclusively on the competencies, skills and experience of the Candidates, avoiding any kind of conscious or unconscious bias.

Blind hiring techniques will be applied whenever possible, hiding personal information such as names, genders and ages, to avoid unconscious bias in the selection.

4.5. INTERVIEWS AND EVALUATION

Candidates shortlisted by HR or the Headhunter will be interviewed by the Vacancy Manager.

The evaluation processes, including interviews and tests, are standardized for all Candidates for the same vacancy, using clear and objective metrics for decision making.

In addition to interviews, technical tests, psychometric tests, case studies and group dynamics may be used to assess the specific skills of the Candidates required for the position.

BRUC's ESG department will monitor that the evaluation process respects the principles of gender equality and non-discrimination.

The selection criteria, the timeline of the process, and the steps to be followed must be communicated in a timely and accessible manner to all Candidates. In addition, Candidates are entitled to receive constructive feedback upon request.

4.6. FINAL SELECTION

BRUC's selection criteria focuses on the Candidate's competencies, experience and development potential, ensuring that the process is fair and competitive.

Once all interviews of short-listed Candidates have been completed, a final decision will be made based on the candidate's suitability for the position, aligned with the Group's principles of meritocracy, equality and diversity.

At BRUC's discretion, background and reference checks may be conducted, subject to the candidate's consent and always respecting the privacy and confidentiality of the Candidate's data.

5. CONTRACTING PROCESS

5.1. OFFER OF EMPLOYMENT

The selected Candidate will receive a formal written offer detailing the position, salary, benefits and working conditions.

The Candidate will have a maximum period of seven calendar days to accept or reject the offer.

5.2. FORMALIZATION OF THE CONTRACT

Once the offer is accepted by the Candidate, they will become a BRUC professional and will proceed to sign the employment contract, in compliance with current labor regulations.

BRUC will manage the collection of the necessary documentation for the incorporation of the professional, ensuring the confidentiality and security of the data.

5.3. ONBOARDING

BRUC has implemented an onboarding program designed to integrate the new professional into the Group's culture, with emphasis on corporate values and Group policies.

6. HEADHUNTERS

6.1. SELECTION OF HEADHUNTERS

BRUC may count on the support of Headhunters for the development of the selection processes, which will be carefully selected by BRUC based on their reputation in the market and their history of adherence to equality, diversity and inclusion policies.

All Headhunters with whom BRUC has a relationship must have a formalized service contract that includes specific clauses on compliance with equality and diversity laws and the implementation of unbiased selection processes, as well as the express written acceptance of the Policy.

BRUC will make available to the Headhunters as much information and/or training as they may require for the correct applicability of this Policy.

6.2. MONITORING AND EVALUATION

BRUC's ESG department will regularly monitor the performance of Headhunters, ensuring that they comply with the signed contract, this Policy, and established expectations and regulations.

Periodic reviews will be conducted to assess the effectiveness of these collaborations and their alignment with BRUC's diversity and inclusion objectives.

7. EVALUATION AND REVIEW OF THE PROCESS

BRUC continuously monitors recruitment and hiring processes, collecting data to identify trends and areas for improvement and to verify that processes are aligned with best practices and current regulations.

In addition, data from the selection processes are collected and analyzed to evaluate the effectiveness of the methods used and compliance with diversity and equality objectives.

8. RESPONSIBILITIES

8.1. HUMAN RESOURCES / ESG

Manage and oversee all aspects of the recruitment and hiring process, ensuring compliance with the Policy as well as all other Group corporate policies and applicable laws.

Provide ongoing training to recruiters and Headhunters on equality, diversity and inclusion issues.

8.2. RESPONSIBLE OF THE VACANCY

Collaborate closely in the definition of the profiles for the vacancy to be published, carry out the interviews and the final selection, respecting this Policy as well as the rest of the Group's corporate policies.

8.3. HEADHUNTERS

Comply with the Policy, as well as with the standards of fair, impartial and unbiased selection, following the guidelines provided by BRUC.

8.4. CANDIDATES

Participate in BRUC's selection and hiring process in an honest manner and provide truthful and complete information.

9. ETHICS CHANNEL

In the event that there are reasonable indications that the provisions of the Policy have been violated or that any act contrary to the law or business ethics that may affect BRUC has occurred, such suspicion must be reported to BRUC through the established channels.

To this end, the Group has established the Ethics Channel, an internal information system through which BRUC professionals, Suppliers or any third party must report possible criminal or administrative violations or any unlawful conduct or conduct contrary to ethics, this Code or applicable law committed in the context of the Group's activity.

The Ethics Channel can be accessed through the following route:
<https://brucenergy.integrityline.com/frontpage>.

Communications made through the Ethics Channel will be processed in accordance with the provisions of BRUC's Ethics Channel Policy and with the guarantees recognized therein. BRUC admits anonymous communications.

The communications will be treated in a strictly confidential manner and there will be no retaliation of any kind against the informant for making the report, unless the same has been made in bad faith, in which case BRUC may adopt the measures it deems appropriate.

10. PUBLICATION AND ENTRY INTO FORCE

The Policy has been approved by BRUC's Board of Directors, at the proposal of the Appointments and Remuneration Committee, on October 15, 2024, coming into force the day after its approval.

The Policy has been published on BRUC's website: <https://brucenergy.com/>.

The Policy will be reviewed annually and updated when necessary, ensuring its alignment with the Group's strategic objectives and corporate policies, as well as with changes in current legal regulations.