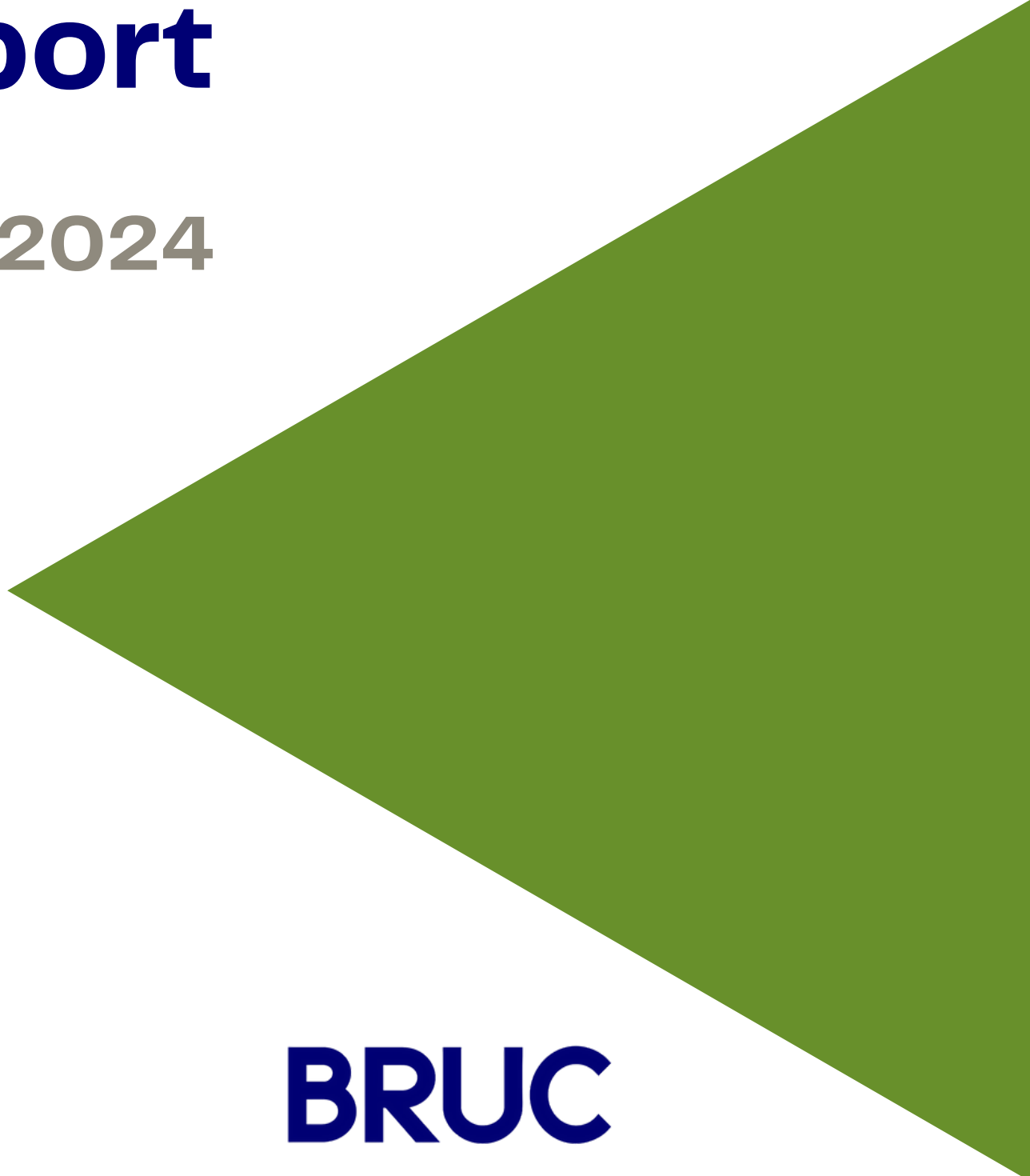




Sustainability Report

2024



BRUC

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Dear stakeholders, employees and investors,

It is a privilege to address you at this important moment for our company. Today, we take great pride in presenting our first Sustainability Report, a significant milestone in the history of BRUC. Our decision to publish this report voluntarily underscores our dedication to transparency, social responsibility, and, most importantly, sustainability.

Since our inception a decade ago, we have diligently worked to establish ourselves as a premier company in the generation of renewable energy in Spain, and the outcomes of recent years attest to this commitment. Our growth has been extraordinary, not only in terms of installed capacity and production but also in the beneficial impact we are creating within the communities we operate.

Over the past two years, we have significantly enhanced our initiatives concerning ESG (environmental, social, and governance) principles, by integrating them into the core of our business strategy. We have achieved notable advancements in the improvement of our operational processes, assessing and further reducing our carbon footprint, and fostering projects that support local communities. Regarding governance, we have endeavored to uphold integrity, ethics, and accountability throughout all our operations.

The outcomes of this effort are evident in the key sustainability indicators presented in this report. We have reached significant milestones in the energy transition, enhancing our renewable generation capacity and progressing steadily toward our long-term sustainability objectives.

We recognize that the journey towards a fully decarbonized economy is extensive and demanding; however, we firmly believe that with the dedication of everyone within this organization, alongside the support of our partners and collaborators, we can realize this goal. Our commitment to the future and to subsequent generations forms the foundation of our business vision, and this report represents merely the initial step in a series of initiatives we will undertake to further progress toward sustainability.

We will persist in our efforts with passion and dedication to transform a greener, fairer, and more sustainable future into a reality for all.

Thank you for placing your trust in us.

Best regards,

Mr. Juan Béjar
President



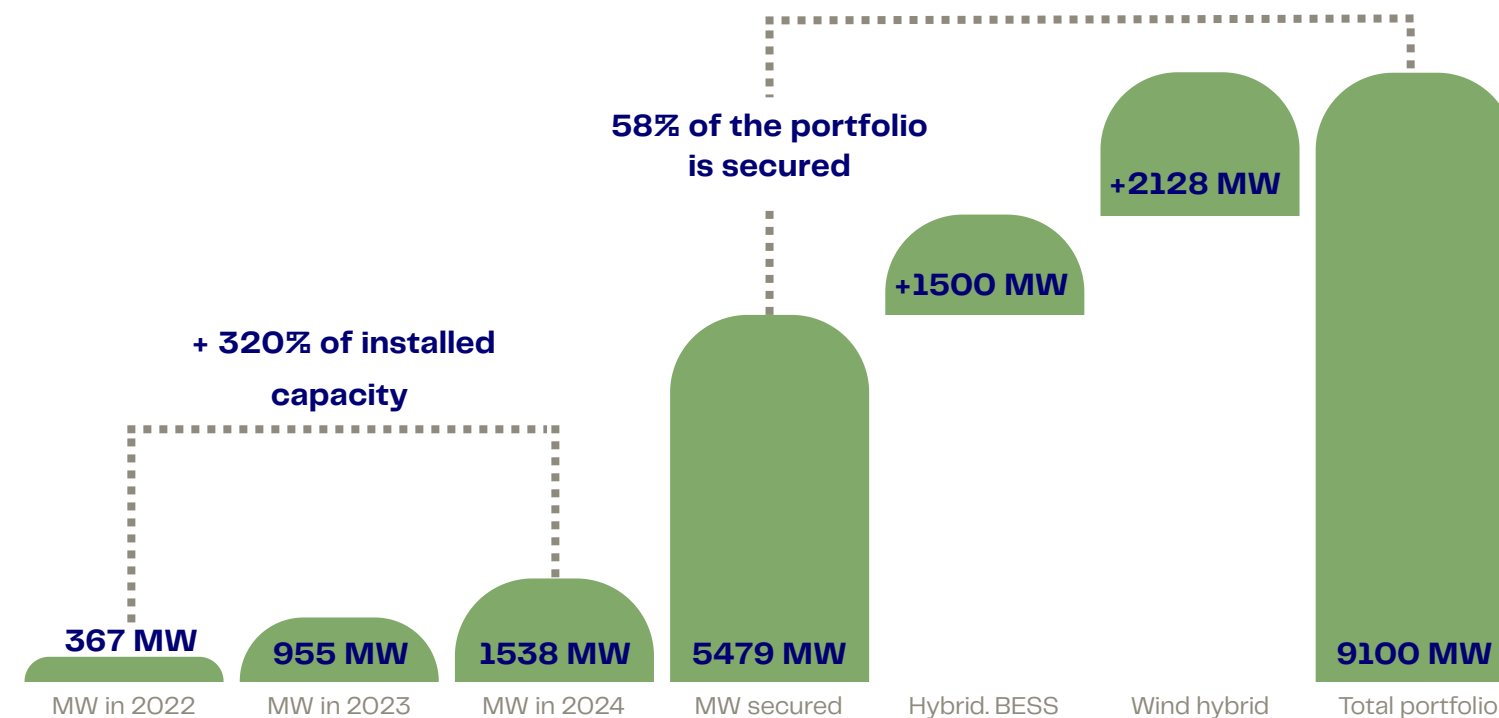
2. About BRUC

BRUC is among the largest renewable energy generation groups in Spain. Founded by entrepreneur Juan Béjar, the shareholders include OPTrust, and USS. The company is led by CEO, Luis Venero.

BRUC states that an urgent energy transition towards a decarbonized economy is essential. A significant aspect of this transition hinges on the advancement of clean energy, which must play a greater role in the energy systems of nations.

BRUC currently has a renewable portfolio in Spain that includes photovoltaic, wind, and battery assets totaling 9,100 MW across projects in operation, construction, and development, of which 1,538 MW^[1] are already operational. Furthermore, the Group manages 70 MW of photovoltaic assets in Japan.

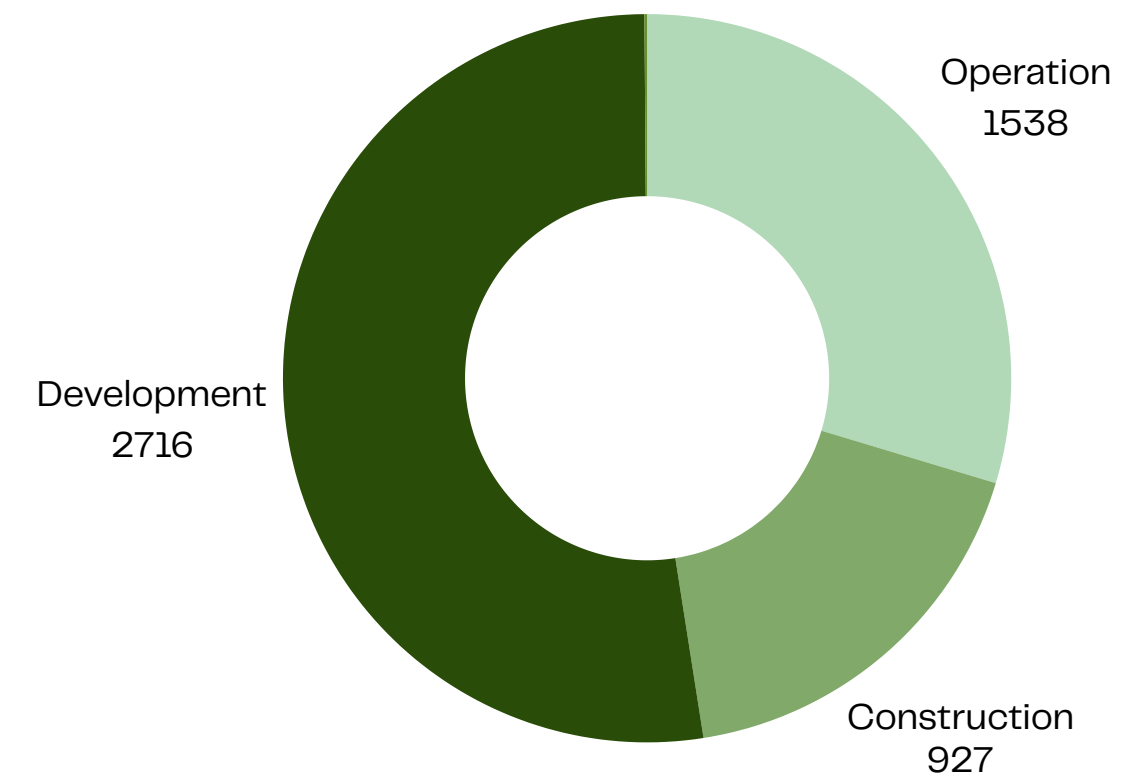
The funding for the construction and commissioning of the asset portfolio is secured through multiple agreements with leading national and international financial institutions. It is important to highlight that all financing agreements currently in effect for the Group are governed by the Green Loan Principles regulation. BRUC sells the energy produced either to the market or through Power Purchase Agreement (PPA) model to premier companies.



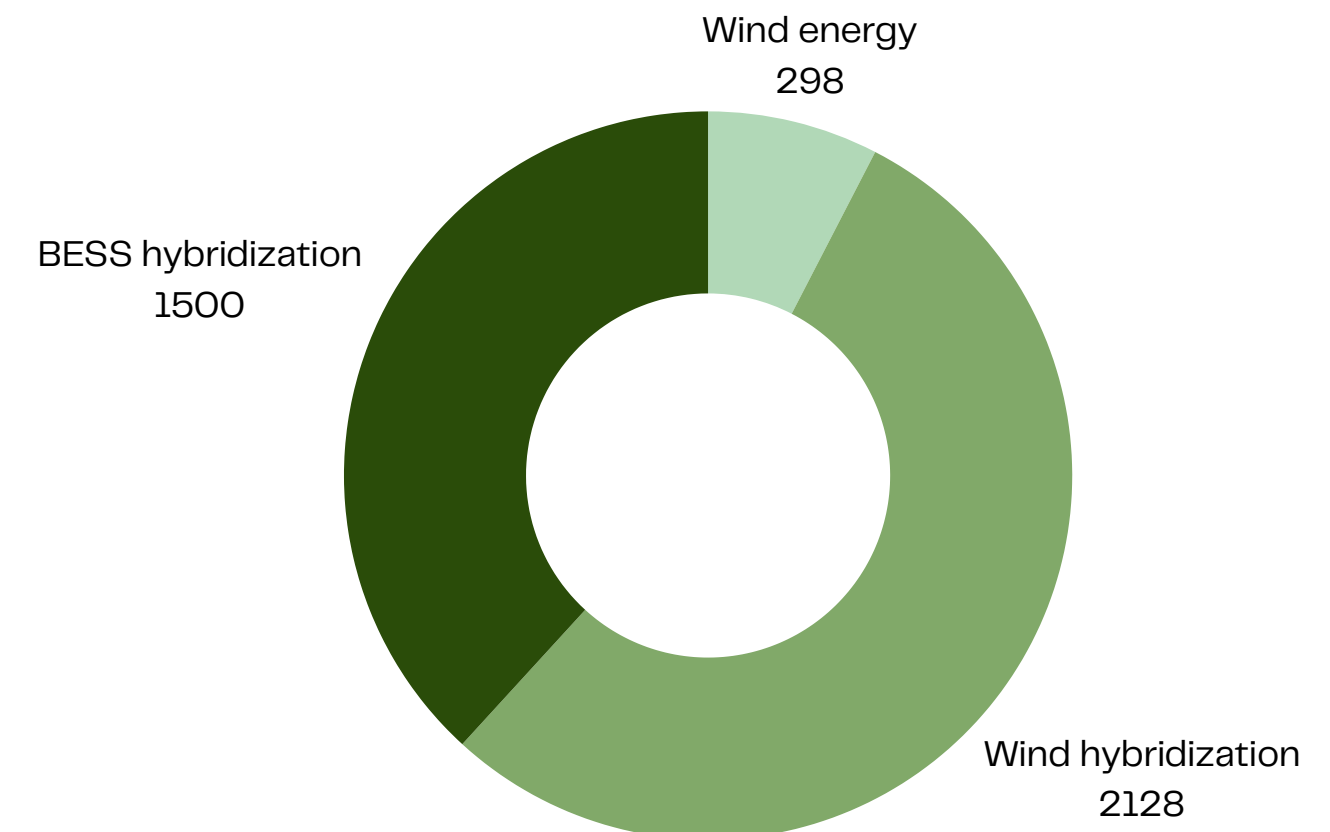
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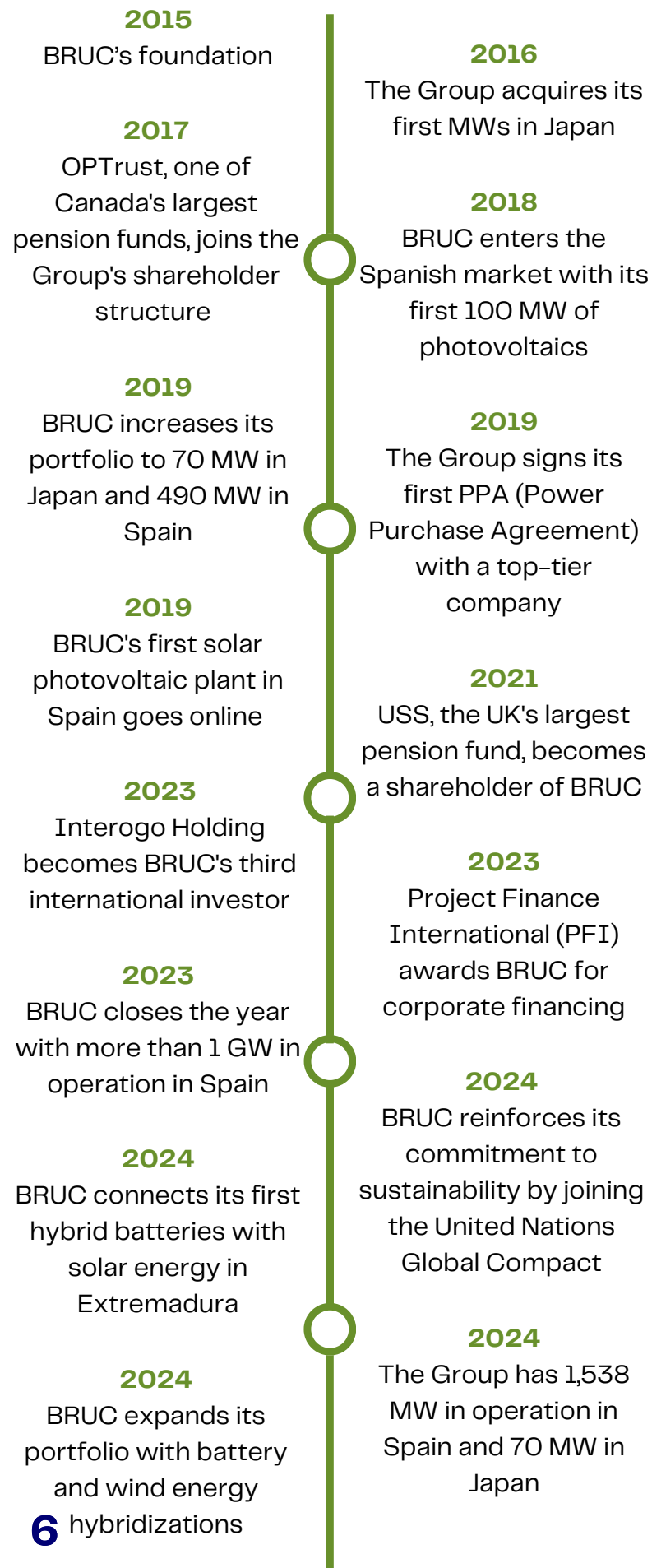
SUSTAINABLE
RENEWABLE
ACCESSIBLE

SPAIN SOLAR PORTFOLIO (MW)



OTHER TECHNOLOGIES UNDER DEVELOPMENT IN SPAIN (MW)





MISSION

BRUC's mission is to generate attractive investment opportunities in the field of renewable energies and to manage assets with the objective of contributing to the sustainability of energy supply systems and substantially reducing their environmental impact.

VISION

BRUC is configured as a leading company in its sector, fully aligned with global sustainable plans, European regulations and the highest sustainability standards, recognized by its stakeholders as a guarantee of quality, experience, profitability, innovation, flexibility and transparency, through continuous analysis and understanding of the renewable energy sector.

VALUES

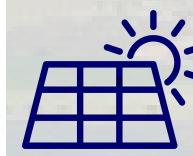
– **INTEGRITY:** At BRUC, the business approach is based on the creation of value through responsible and ethical practices, founded on principles of honesty, respect, sustainability, innovation, fairness, transparency and integrity.

– **EXCELLENCE:** BRUC is committed to establishing lasting business relationships based on excellence, honesty, professional responsibility and value contribution.

– **SUSTAINABILITY:** BRUC is committed to the environment and society and seeks a balance between the profitability of its business model and the protection of the surroundings and the environment, contributing to the well-being of people and the efficiency of resources.

– **TEAMWORK:** BRUC is aware that each person has a unique talent and that we must strive to make the most of this diversity to create synergies in our daily work.

BRUC in 2024 in Spain



Operational data

MW in operation	1,538 MW
Technology	Solar photovoltaic
Production	2,018.404 GWh
Projects in operation	29
Emission-free installed capacity	100%
Revenue	46.506M€



Environment protection

Avoided emissions	524,785.04 tons CO2
Carbon footprint	
• Scope 1	0
• Scope 2	144.15
• Scope 3	270,533.73
Electricity consumption	4,066 MWh
• Of which renewable	76.55%
Environmental sanctions	0



Commitment to people

Number of employees	46
Female representation	32.60%
Wage gap	4.60%
Permanent hiring	100%
Employee turnover rate	8%
LTIFR	
• Own employees	0
• Indirect employees	10.77



Good governance

Number of Directors	6
Female representation in the Board of Directors	16.66%
Number of meetings of BoD	5
Management Committee	7
Female representation in Management Committee	43%
Communications received in the Ethics Channel	0

3. Materiality assessment

3 Double materiality

Materiality analysis serves as the foundation for both a sustainability strategy and any responsible corporate action.

The Double Materiality Principle establishes criteria to assess the relevance of a sustainability issue or information to the Company, considering two dimensions for management.

- Financial materiality: examines the influence of non-financial factors on the Company's economic and financial condition (including income, expenses, balance sheet, etc.).
- Impact materiality: examines the influence of the Company's activities on society, the surrounding environment and other external stakeholders.

PHASES AND METHODOLOGY

PHASE 1 – ASSESSMENT

Understanding the current landscape and fostering awareness: Developing a comprehensive overview of BRUC's sustainability status, highlighting areas for enhancement, opportunities for growth, and emerging challenges.

PHASE 2 – DIALOGUE

Understanding stakeholder expectations: Recognizing and comprehending stakeholder expectations and needs is essential for the Company to make informed decisions, sustain trust-based relationships, and cultivate a robust and responsible reputation.

PHASE 3 – STRATEGIC ACTION PLAN

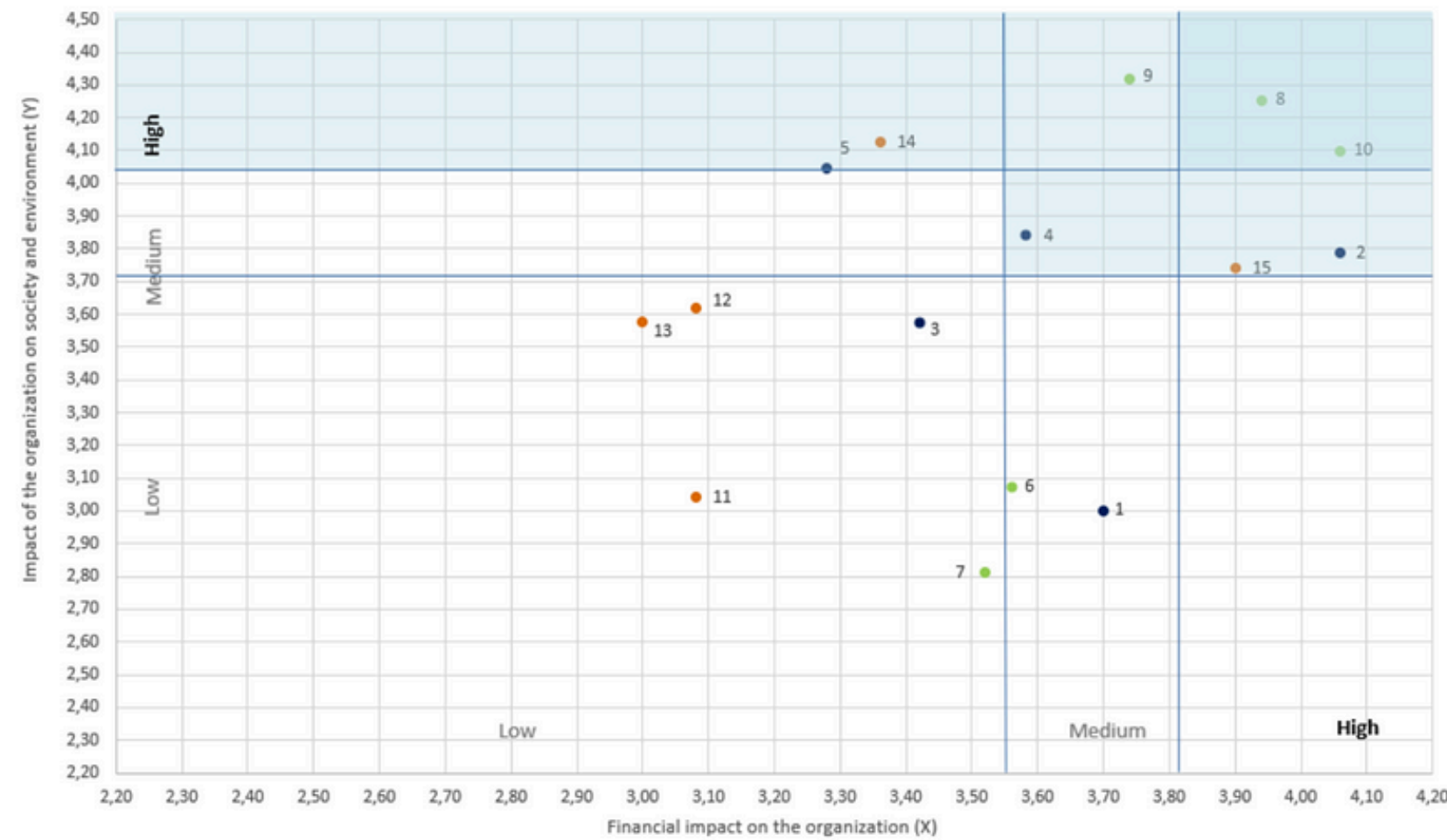
Establish a roadmap and a clear path to enhance positioning and facilitate the development of a comprehensive and effective sustainability strategy.

Within the realm of material ESG issues, BRUC’s materiality matrix has been formulated based on the collected data, considering the following factors: investor perspective (20%), global and sector benchmarks (15%), analysis of relevant international regulations and standards (30%), expert opinion (15%), and dialogue with stakeholders (20%).

To ascertain the relevance parameters for financial materiality and social and environmental impact (low, medium, and high), quartiles have been computed for both dimensions.

The material issues identified in the analysis are the themes around which BRUC's sustainability strategy, its ESG policy and the content of this report are articulated.

BRUC MATERIALITY MATRIX



MATERIAL SUBJECTS

Financial management and good governance	Protection of the environment	Commitment to people
1. Financial and operational excellence	6. Energy transition	11. High-quality employment
2. Recruitment methodologies	7. Environmental investment	12. Safety and well-being of employees and subcontractors
3. Ethical Standards, Anti-Corruption and Bribery	8. Biodiversity and Land Utilization	13. Protection of human rights
4. Risk and Crisis Management	9. Emissions	14. Diversity, Equity and Inclusion
5. Governance and compliance with current legislation	10. Management of waste and product life cycles	15. Engagement with local communities and stakeholders

An aerial photograph showing a vast solar farm with rows of photovoltaic panels installed in a rural area. The solar panels are dark and arranged in neat, rectangular blocks. Surrounding the solar farm are green agricultural fields and some brown, possibly fallow or harvested, land. In the far distance, a line of trees and a small town or village can be seen under a clear sky.

4. Driving sustainability

4 We drive sustainability

BRUC plays an active role in global decarbonization and in the transition to an energy mix based on clean energies, adopting a sustainable approach in its business strategy and management. It aims to promote social well-being and respect the environment through all its actions.

For BRUC, sustainability represents not only a fundamental value, but also a competitive advantage in its market positioning. The development of its ESG strategy allows it to move forward with a strategic approach that seeks to consolidate itself as a leading company in sustainability at a global level.

The sustainability strategy is aimed at strengthening BRUC's reputation and gaining the trust of all its stakeholders, while at the same time promoting the reduction of the negative impact of its activities. It is based on principles of ethics, transparency, responsibility and sustainability, which guide its actions in the environmental, social and economic spheres.

In this way, BRUC's sustainability strategy seeks to generate a positive impact on all stakeholders, minimizing negative effects and maximizing the creation of long-term value. It should be noted that BRUC's sustainability strategy has been developed taking into account the material issues obtained in the dual materiality analysis and is articulated around the ESG Policy, approved by the Board of Directors in 2023 and updated in 2024, focused on the following principles and objectives:

	Protection of the environment	Commitment to people	Financial and governance
Material topic	- Energy transition. - Biodiversity and land use - Waste and product lifecycle management	- Diversity, equity and inclusion - Employee and subcontractors' health and safety. - Relationship with local communities and engagement with stakeholders - Protection of Human Rights.	- Risk and Crisis Management - Governance - Procurement practices - Environmental investment. - Financial and operational excellence
Medium and long-term ESG targets	Mid-term: - Manage climate risks (Annual participation in CDP starting in 2025). - Implement energy efficiency initiatives (such as electricity consumption from renewable energy). Long-term: - Carbon neutral in 2045 and offsetting of residual CO2 emissions (Will be validated by SBTi). - Nature Net Positive certification for 2030. - Ensure that all facilities have a specific plan for waste management, and above all, once the projects have ended.	Mid-term: - Maintain female representation above 25% and manage wage gap. - Promote career plans and training to retain talent. - Zero-accident culture (audits, training, H&S coordinator, initiatives to secure all facilities). - Zero tolerance of anti-human rights practices (due diligence and audits to suppliers, ethic channel in place, training...). Long-term: - Create an engagement program with the local communities where BRUC has presence.	Mid-term: - Assessment of environmental, social and governance issues to 100% of main suppliers. - Ethics, anti-corruption and bribery management. - Promote Green Loans, ESG-linked Loans and Equator Principles in our project finances. Long-term: - Ensure continuous compliance with all the regulations applicable. - Promote local suppliers. - Continue with the fulfillment of BRUC's business plan for renewable energy projects and seek maximum profitability for investors.

Contribution to the Sustainable Development Goals

In 2015, the United Nations World Organization adopted the 17 Sustainable Development Goals (hereinafter “SDGs”), within the framework of the 2030 Agenda for Sustainable Development, with the aim of eliminating poverty, reducing inequalities, combating climate change and protecting the environment. The success of the 2030 Agenda depends on the efforts and collaboration of society as a whole.

As a participant in the United Nations Global Compact from 2024, BRUC reaffirms its commitment to sustainability by reinforcing and aligning its strategy with the Ten Universally Accepted Principles in the areas of human rights, labor, environment and anti-corruption, and deploying measures that support the goals and issues of the United Nations embodied in the Sustainable Development Goals (SDGs).

BRUC's adherence to the Global Compact was driven by the Company's understanding of the importance of corporations in advancing the SDGs.

Specifically, BRUC actively contributes to 10 of the 17 SDGs, and ensures that it does not harm any of the others, by applying the Do Not Significant Harm (DNSH) principle.



The world faces unprecedented environmental, social and economic challenges, driven by climate change, growing energy demand and geopolitical tensions. These challenges, coupled with the accelerating transition to sustainable economies, are transforming global energy systems. Renewable energies are presented not only as an option, but as a strategic necessity to ensure a cleaner, fairer and more secure future.

Climate change has become the most urgent global challenge. The concentration of greenhouse gases is altering the climate balance, leading to extreme phenomena such as heat waves, intense storms, droughts and rising sea levels. COP21 in Paris (2015) highlighted the urgency of reducing CO2 emissions and limiting global warming to 1.5°C. Each year, climate summits reaffirm this need. The main conclusion of COP29 (held in November 2024) has been firm: climate change is an inescapable reality that requires urgent and concrete action at the global level.

In response to this challenge, nations are advocating for more sustainable energy policies. A prominent example is the European Green Deal, which seeks to establish Europe as the first climate-neutral continent by 2050. Spain, for its part, has revised its National Integrated Energy and Climate Plan (PNIEC) in 2024, setting ambitious targets, including a **23% reduction in greenhouse gas emissions by 2030** relative to 1990 levels, an **increase in the share of renewable energy in electricity generation to 74% by 2030**, and an **enhancement of energy efficiency by 39.5%**.

Furthermore, international organizations such as the United Nations and the International Energy Agency (IEA) advocate for the energy transition within the context of the Sustainable Development Goals (SDGs), particularly SDG 7, which aims to guarantee universal access to affordable, reliable, and sustainable energy.

The shift to renewable energy is essential not only for addressing climate change but also for enhancing economic growth. The renewable energy sector is witnessing substantial expansion, generating green jobs and encouraging innovation in emerging technologies. This progress is fostering competitiveness and the emergence of new economic sectors.

In conclusion, the prevailing global landscape favors the expedited transition to renewable energy sources, a critical sector. This transition is not only vital for mitigating climate change but also presents a distinctive opportunity to enhance energy security, promote economic development, and advance toward a more sustainable society.

ESG Legislation

It is not only renewable energies that are experiencing significant growth. Corporate sustainability is crucial to address global challenges. In this regard, the ESG regulatory framework has grown significantly in recent years, responding to growing concerns about the risks associated with climate change, social inequalities and the lack of transparency and ethics in business.

Listed below are some of the key rules within the broad regulatory framework that will apply to BRUC in the short term:

CSRD (Corporate Sustainability Reporting Directive): This Directive, approved by the European Union, expands sustainability reporting obligations for companies, requiring greater transparency in the disclosure of non-financial and sustainability information. Some of the main new features are dual materiality, disclosure of sustainability objectives and targets, impact, risk and opportunity (IRO) analysis, new topics, mandatory independent verification and alignment with other European standards.

EU Taxonomy Regulation: This initiative is complementary to the CSRD and other regulations that seek to promote more sustainable financial practices. It establishes clear criteria for classifying economic activities that are considered environmentally sustainable.

Paris Agreement: Governs international commitments to mitigate global warming and sets forth emissions reduction targets that nations, and consequently, corporations, are required to adhere to.

Climate Change Law: Its main objective is to reduce greenhouse gas emissions, promote the transition to renewable energies and encourage sustainable practices in various economic sectors. Its implementation reflects a governmental commitment to address environmental impacts and promote more sustainable development. It is an essential regulation for the orientation towards the decarbonization of the Spanish economy.

In conclusion, the ESG regulatory context is crucial for driving a sustainable, fair and transparent global economy. Regulations not only help mitigate climate and social risks, but also foster innovation, competitiveness and corporate responsibility. In this sense, compliance with ESG regulations is essential for companies seeking to remain relevant, profitable and responsible in the future.



5. Protection of the environment

5 Protection of the environment

In a world where environmental and social challenges are increasingly urgent, sustainability is no longer an option, but a responsibility. For BRUC, sustainability is much more than a value; it is the foundation on which it builds its strategy.

BRUC is a company dedicated to renewable energies since its origins and, therefore, the fight against climate change and the protection of the planet is fundamental for the Company. The Group considers it a priority to lead the energy transition towards a cleaner and more respectful model, in which coal is not a necessity, in order to reduce or mitigate the adverse effects of climate change.

A 100% RENEWABLE BUSINESS AND COMMITTED TO THE ENVIRONMENT

BRUC is a 100% renewable company with a firm commitment to the environment, which is integrated in all its activities and projects. Through renewable energy generation, BRUC not only meets energy demand, but does so while minimizing environmental impact. The Company is consistently moving towards the total decarbonization of its operations, actively supporting the global energy and economic transition. Each new project it undertakes reflects this commitment, with continuous investment in innovation and new technologies.

In 2024, BRUC in Spain generated **2,018.404 GWh** of renewable energy, representing an increase of **40%** over the previous year. This growth has made it possible to avoid the emission of **524,785.04 tons of CO2 to the atmosphere**, which is equivalent to the pollution produced by 353,221 combustion vehicles [2]. In addition, the energy produced could supply the consumption of **512,936 households in Spain** [3], highlighting the Company's impact on energy sustainability at the national level.

BRUC's commitment to environmental protection is central to its mission, and is reflected in its Code of Conduct, its Sustainability Policy and all its internal policies. The Group not only focuses on decarbonization, but adopts a comprehensive approach that also includes the protection of biodiversity and the natural environment in which it operates. It also ensures that it complies with all current environmental norms and regulations, demonstrating responsible and proactive management in the preservation of the environment.

In this way, BRUC continues to move forward with determination towards a more sustainable future, where the generation of renewable energy not only represents an opportunity for economic growth, but also an essential tool to contribute to the protection of the planet and the well-being of future generations.



RISK MANAGEMENT AND CLIMATE OPPORTUNITIES

In a global landscape where climate change is increasingly acknowledged as a pivotal factor in business decision-making, organizations must adopt a strategic approach to evaluate and manage the risks and opportunities associated with this phenomenon. Assessing these elements is crucial, not only to mitigate potential adverse effects but also to identify opportunities for growth and differentiation in a market transitioning towards sustainability. In this context, the Task Force on Climate-related Financial Disclosures (TCFD), established by the Financial Stability Board (FSB), offers an important framework that assists companies in effectively integrating climate change into their corporate governance strategies, ensuring that climate risks and opportunities are managed and communicated appropriately.

The TCFD framework has been established to offer explicit guidance on how companies ought to identify, assess, manage, and disclose risks and opportunities associated with climate change. BRUC follows the TCFD recommendations, which emphasize four fundamental pillars:

- **Governance:** BRUC has established a climate management governance framework within the organization, wherein the Management Committee and BRUC's Sustainability Manager actively engage in the development, monitoring, and oversight of climate risks, decision-making, and alignment with sustainability objectives. The Board of Directors serves as the highest authority overseeing climate risks and opportunities, ensuring their integration into the Group's overarching strategy.
- **Strategy:** BRUC has conducted an assessment of the potential impacts of climate risks and opportunities on its business model across short, medium, and long-term horizons. This analysis has been integrated into the Group's strategic framework and is detailed in the following pages of this Report.
- **Risk Management:** The Group recognizes the significance of identifying, assessing, and managing climate risks within its comprehensive risk management framework. This encompasses the identification of both physical and transition risks, alongside the formulation of adaptation and mitigation strategies to diminish vulnerability to extreme weather events and regulatory shifts.
- **Metrics and Targets:** To effectively manage climate risks and opportunities, BRUC has established clear metrics and sustainability goals to mitigate climate risks and exploit climate opportunities. The goals and objectives established by BRUC are set out throughout this Report.

In 2024, BRUC conducted a climate risk and opportunity analysis based on the TCFD recommendations. This process has been essential to understand the threats and opportunities arising from climate change, in order to protect assets and optimize the Group's investment strategies.

First, a preliminary analysis was conducted based on the sector and location where the Group operates. This approach, which can be consulted on the following page, has made it possible to identify in general terms the physical and transition risks faced by the Company.

Subsequently, an in-depth analysis of physical climate risks has been conducted, using accurate data to understand the frequency, intensity and consequences of past climate events that have impacted the Group's areas of operation, as well as a technical review of potential climate hazards, focused on assessing how these may affect the integrity of existing projects and assets.

A key aspect of this process has been the determination of relevant time horizons for the Company. This allows not only proactive risk management, but also the adoption of measures to mitigate their potential effects in the future.

The analysis has been completed with the use of public visualization tools and specialized climate data viewers. These tools have been essential to project climate change impacts under different Representative Greenhouse Gas Concentration (RCP) scenarios. The RCP scenarios are crucial for assessing how global climate policies could evolve and how these changes will affect the Group's assets in the future.

The three RCP scenarios used are:

- RCP 2.6: This scenario represents the most optimistic outlook, positing a stabilization followed by a decline in CO₂ emissions, potentially achieving negative levels by the century's end. It envisions a future where global warming may be constrained to under 2°C relative to pre-industrial levels.
- RCP 4.5: In this intermediate scenario, CO₂ emissions rise moderately until the middle of the century, followed by a decline and stabilization. This scenario illustrates a future where climate change mitigation policies are enacted, albeit at a moderate pace, leading to moderate global warming.
- RCP 8.5: This represents the most adverse scenario, characterized by a persistent and substantial rise in CO₂ emissions until the century's conclusion. It is deemed the most probable scenario in the absence of effective mitigation strategies. Under this scenario, global warming may surpass 4°C, resulting in severe repercussions for biodiversity, ecosystems, and the Group's assets.

Climate Risks

Physical Hazards

These risks pertain to the direct impacts that climate change may have on BRUC's operations and are categorized into acute physical risks and chronic physical risks.

- Acute risks: These risks stem from extreme weather events, including storms, hurricanes, heat waves, floods, and droughts, which can impact the infrastructure and operations of renewable energy facilities.
- Chronic risks: These risks stem from the prolonged impacts of climate change, including rising sea levels, altered precipitation patterns, and extreme temperatures.

For additional details regarding the physical risks faced by BRUC, please refer to Annex II.

Transition Risks

These risks emerge from the shift towards a low-carbon economy. As governments and societies implement more stringent policies to decrease greenhouse gas emissions, energy companies are compelled to adjust to new regulations and market demands.

- Regulatory risks: BRUC may face exposure to risks stemming from the evolving regulations surrounding energy transition that impact its operations, particularly regarding reporting requirements or the establishment of ambitious climate and decarbonization objectives necessitating additional resources.
- Market risks: The rise of competition from emerging renewable energy and energy storage technologies may render existing technologies obsolete, potentially jeopardizing investment returns.

Mitigation strategies

The Group is presently formulating a comprehensive response protocol to address the identified climate risks. Examples of climate risk mitigation measures implemented by BRUC include:

- Technological diversification
- Risk evaluation
- Resilience and efficiency in project elements and design.
- Contingency planning and the procurement of insurance policies
- Regulatory adherence and foresight regarding emerging regulations
- Social discourse



Climate opportunities

Physical Opportunities

Climate change presents several opportunities for the renewable energy sector. Companies in this field can capitalize on climate change by optimizing the utilization of available natural resources. For instance, enhanced sunlight hours or increased wind speeds in specific regions can significantly boost the efficiency of solar and wind projects.

Furthermore, renewable energy generation companies can spearhead climate adaptation initiatives by developing infrastructure that is more resilient to extreme weather events, thereby appealing to investors seeking firms with a strong sustainability strategy.

Transition Opportunities

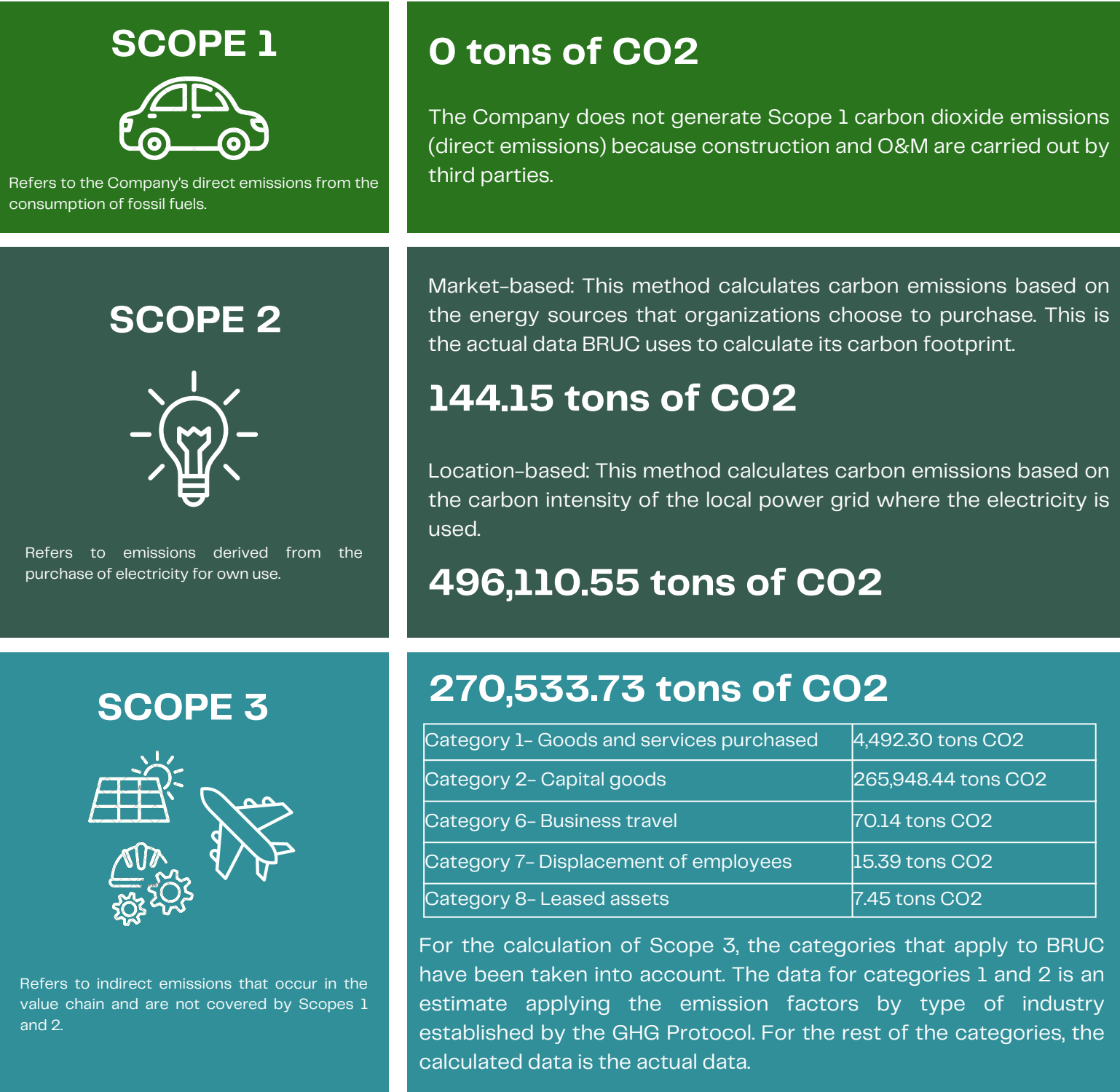
The transition to a more sustainable economy presents numerous opportunities.

- Increasing demand for renewable energy: The rising demand for clean energy in both local and international markets, propelled by climate policies and global commitments, supports the expansion of renewable energy generation.
- Emerging financing sources: The energy transition is drawing investments from sustainable capital funds that aim to support projects aligned with the Sustainable Development Goals (SDGs) and ESG criteria.
- Technological innovation in renewable energy, including solar, wind, and energy storage, presents an opportunity for Spanish renewable energy generation companies to enhance their capabilities and optimize operational efficiency.
- Clean energy infrastructure development: As the renewable energy sector progresses, opportunities emerge to establish new infrastructure and business models centered on sustainability.

5 Our carbon footprint

BRUC, in accordance with its continuous efforts to fully integrate sustainability into its business strategy, has assessed its internal and external carbon dioxide emissions for the first time.

BRUC's corporate carbon footprint has amounted to **270,677.88 tons of CO2** in 2024 and is broken down as follows:



Optimal resource utilization

The efficient use of resources is fundamental to ensuring the long-term sustainability of companies and society as a whole. As natural resources become increasingly scarce and pressure on the environment increases, it is crucial that organizations adopt practices that optimize the consumption of energy, water, raw materials and other inputs.

In addition to reducing operating costs, resource efficiency helps to reduce carbon emissions and the environmental impact of production activities. This approach not only favors competitiveness and profitability, but also reinforces the company's commitment to social and environmental responsibility. BRUC makes every effort to be as efficient as possible in the resources it uses in the development of its activity.

In this sense, and as a first step on the road to energy efficiency, the Group has calculated the electricity consumption for the year, with a view to optimizing it in the coming years.

Breakdown of energy consumption for 2024:

The total electricity consumption across all Group facilities reached **4,066,479.91 kWh** by the end of 2024, with **76.55%** derived from renewable sources.

It is important to highlight that the Group has established the objective of substituting electricity derived from non-renewable sources with electricity from renewable sources across all its facilities by 2025.



For BRUC, the protection of biodiversity and the environment is fundamental to ensure sustainable and environmentally friendly development.

To date, the Group has achieved numerous environmental achievements in its projects, which have had a significant impact not only on the natural environment, but also on the local communities, contributing to the sustainability and care of the environment, as well as generating positive socioeconomic effects, favoring the well-being and development of nearby populations.

Below are some of the key strategies and actions that BRUC carries out to make a positive contribution to biodiversity and the surrounding flora and fauna:

Responsible placement of photovoltaic plants

- Environmental Impact Assessment (EIA): Prior to the construction of new projects, a thorough environmental impact assessment is conducted to identify and mitigate possible negative effects on local biodiversity.
- Selection of non-sensitive land: BRUC ensures that its projects are not located on land that is critical habitat for protected species or vulnerable ecosystems, such as forests, wetlands, protected natural areas, or areas of high ecological value.
- Avoiding deforestation: BRUC makes sure to avoid deforestation, for which construction is carried out in a respectful manner, without destroying natural habitats, especially in areas with high biodiversity.
- Beyond strict compliance with legislation: BRUC has modified certain compensatory measures imposed by the EISs[4] for others that are more effective and have a high environmental impact.

Sustainable infrastructure design

- Minimization of land use: BRUC strives to design its projects in an efficient manner, in order to occupy as little land as possible and respecting at all times areas with high biodiversity.
- Creation of ecological corridors: BRUC incorporates in its projects green spaces between the facilities or in the surroundings, allowing local species to move around safely. It is worth mentioning the planting of rotational crops or aromatic crops in several projects.
- Other agricultural and livestock measures: establishment of vegetation stands to generate ecological connectivity, shelter and food for fauna, restoration of natural pastures and wetlands, reestablishment of temporary ponds to improve herpetofauna and entomological fauna populations, installation of nesting boxes, hives and beehives, etc.
- Promotion of native vegetation: BRUC promotes the use of native plant species in the surrounding areas to preserve local flora and improve ecosystems.
- Light and noise pollution: BRUC does not cause any light pollution and takes all measures to avoid any noise in its activity (not working at night, not working during the nesting period, establishment of maximum allowed speeds, machinery control, etc.).

Alliances and trainings

- Collaboration with environmental organizations: BRUC collaborates with environmental organizations and universities to study biodiversity in the areas where the projects are located and nearby areas.
- Training: BRUC carries out an important public and social function through outreach and environmental education activities in the surrounding area. Specifically, BRUC is developing a project for the construction of a bird watching center, informative conferences, environmental education conferences, environmental events, etc.

SUCCESS STORY

Protection and recovery of the Rufous-headed Lark

BRUC has promoted an important biodiversity conservation project in one of its photovoltaic projects located in the town of Fuentes de Ebro (Aragon), aimed at the protection and recovery of the Dupont's Lark (*Chersophilus duponti*), whose Iberian population is in regression, being catalogued as endangered.

The photovoltaic complex, which includes seven solar plants and two high-voltage overhead lines with a capacity of 281 MW, includes a series of measures aimed at protecting the area's biodiversity.

One of the project's most important biodiversity protection initiatives, developed by BRUC in collaboration with Texla Renovables, which is in charge of environmental management, is the union of the Ornithological Reserves of El Planerón and La Lomaza, through the purchase of unirrigated agricultural land. Specifically, BRUC has already authorized the purchase of 100 hectares of land, located in Belchite, Zaragoza, destined to create an optimal environment for the recovery of the species.

This land has been ceded in its entirety to SEO BirdLife (Sociedad Española de Ornitología), a Spanish non-governmental organization of public utility whose main objectives are the conservation and study of birds and their habitats, with the aim of connecting two key areas for the Eurasian Skylark, thus favoring the restoration of its natural habitat and contributing to the survival of this species.

The Planerón Ornithological Reserve is located 15 kilometers from Belchite, in the direction of Codo and Quinto, and was created by Seo BirdLife in 1992 through the purchase and transfer of farmland and wasteland. The reserve is an interesting natural area that is home to other bird populations in addition to the Meadowlark, such as the Lesser Short-toed Lark (*Calendrella rufescens*), the Calandra lark (*Mimus saturninus*) and the Black-bellied Sandgrouse (*Pterocles orientalis*), among other steppe species. On the other hand, the Lomaza de Belchite wildlife refuge was declared a protected natural area in 1995 and is a nesting place for this type of birds, with 961 protected hectares of remarkable scenic beauty where esparto, thyme, rosemary, ontinas and jarillas predominate.

The initiative will restore essential steppe habitat for many species of flora and fauna in the area, while contributing to biodiversity conservation and promoting the health of local ecosystems. In addition to restoring the habitat of the Rufous Lark, it will benefit other local species and contribute to the creation of essential ecological corridors for the region's wildlife.

For BRUC, the circular economy is a crucial element in safeguarding the environment and biodiversity. The Group's operations produce minimal waste, occurring primarily during two phases: the construction phase and the dismantling phase.

- **Construction:** During the construction phase of the Group's projects, the waste generated is managed by the subcontracted companies responsible for construction. These companies prepare the environmental management plan and the waste management plan for each project, which are subsequently validated and supervised by BRUC. Throughout the construction phase of each project, designated clean points and waste collection points, managed by authorized waste managers, are established on-site to ensure comprehensive waste management.

It is important to note that BRUC's operations do not produce any additional gas emissions beyond carbon dioxide, as detailed in the section on the carbon footprint, except during the construction phase of an electrical substation. This is due to the requirement of sulfur hexafluoride (SF6) for medium voltage cells, with the charge being applied at the time of installation of these cells in the substation.

- **Operation and Exploitation Phase:** During the operational phase of the projects, waste generation is minimal, primarily occurring during breakdowns when project components require replacement. The damaged parts are handled by authorized waste managers responsible for their recycling. In this context, designated clean points are established across all projects. Another prevalent type of waste during the exploitation phase is brush cuttings. It is noteworthy that BRUC conducts the majority of its brush cutting using sheep, which not only eliminates pollution but also consumes the brush, thereby preventing the generation of this type of waste.

The Group's projects do not produce any type of gas or other pollutants during this phase, aside from the minimal carbon dioxide emissions associated with the operational phase, except in rare instances involving a leak of SF6 gas, utilized in high-voltage cells, which would necessitate a recharge. Throughout 2024, there have been no SF6 gas leaks reported in any of the Company's facilities.

- **Decommissioning:** The Group's projects possess a useful life of approximately 30 years. BRUC formulates a dismantling and recycling plan for each project, which is executed upon the expiration of the project's useful life, with the aim of returning the project's location to its original condition. This plan delineates strategies for recycling and reusing components, in addition to landscape restoration.

In accordance with BRUC's decommissioning plans, upon the project's conclusive completion, all infrastructure will be dismantled, and any surplus materials, waste, or soil will be transferred to authorized managers for recycling. This encompasses the perimeter fence, the foundations of the solar field transformer stations, and any other residual infrastructure. Subsequently, the occupied land will be restored to its original condition.



BRUC, as a key player in the energy transition and committed to protecting the environment, makes strategic investments aimed at ensuring that its operations are sustainable and environmentally friendly.

The Company, dedicated to the generation of renewable energy, allocates 100% of its CAPEX to contribute to the fight against climate change, focusing on sustainability. In addition, BRUC goes beyond the generation of renewable energy, making additional investments that seek to reduce the environmental impact and maximize the efficiency of its projects in each phase of their life cycle, seeking maximum environmental protection and the environment.

Below are some of BRUC's main areas of environmental investment:

Environmental Impact Assessment (EIA)

Prior to the construction of each project, BRUC invests in comprehensive environmental impact studies (EIA), ensuring that its activities meet the highest environmental standards and are environmentally responsible. These studies, carried out in collaboration with experts in the field, allow for a detailed and accurate assessment of the potential effects of projects.

Based on the results of the EIA, BRUC implements mitigation measures, such as reforestation, erosion control, and protection of endangered species, among others, in order to minimize negative impacts that may arise during project execution and operation.

Recycling and waste management

Materials management and recycling are key areas in BRUC's environmental approach. The Company invests in the efficient management of materials used in its projects.

An important area of focus is the recycling of solar panels at the end of their useful life, which contributes to reducing the waste generated and mitigating the environmental impact associated with their disposal.

Energy storage solutions

BRUC also invests in advanced energy storage technologies, such as lithium batteries, to optimize the use of the energy generated. These storage systems make it possible to efficiently manage fluctuations in electricity supply and demand, which maximizes the use of solar energy. With 1,500 MW of battery hybridization, BRUC will not only improve the efficiency of its energy system, but also facilitate the integration of renewable energy into the grid, contributing to greater stability and resilience of the overall energy system.

Conclusion

BRUC is firmly committed to environmental sustainability, making strategic investments that not only minimize the impact of its operations on the environment, but also drive innovation in clean technologies. From the responsible planning and execution of its projects to the promotion of the circular economy and the efficient use of resources, BRUC is leading the way to a greener future. These investments not only comply with regulations and sustainability goals, but also actively contribute to protecting the environment and advancing the energy transition to a cleaner, more efficient and responsible model.



A photograph of two men standing in a solar farm. They are both wearing white hard hats with the 'BRUC' logo and high-visibility yellow safety vests over grey suits and blue ties. The vests also have the 'BRUC' logo. They are smiling and looking towards the camera. In the background, rows of solar panels are visible under a clear sky.

6. Commitment to people

6 Commitment to people

BRUC's team

BRUC is a company fully committed to society and, in particular, to the professionals who are part of it. For BRUC, its team is its best resource and it is fully aware of the respect for human rights, diversity, equal opportunities, equal treatment and non-discrimination, which, of course, are inalienable and fundamental rights of people.

At the end of 2024, the BRUC team had risen to 46 employees[5], 77% higher than in 2023, in line with the Group's growth. The average number of employees during the year was 36, 11 women and 25 men. In terms of their composition, female representation at year-end 2024 amounted to 33%.

Throughout the year, and due to the Company's efforts to attract and retain talent, a total of 23 new hires were made, 44% of which corresponded to the hiring of women. As for the turnover rate, only voluntary turnover was recorded in the Group during 2024, reaching 8%.

BRUC's workforce is divided into three categories: management team, middle management and graduates and technicians.

Category	Women	Men
Management team	3	4
Middle management	3	9
Graduates and technicians	9	18
Total	15	31

BRUC is committed to offering fair working conditions, promoting permanent contracts and internal promotion. At the end of 2024, 100% of the workforce had permanent contracts, which contributes to the stability and commitment of the team. This approach is reflected in the average length of service of the team, which reaches 2.07 years.

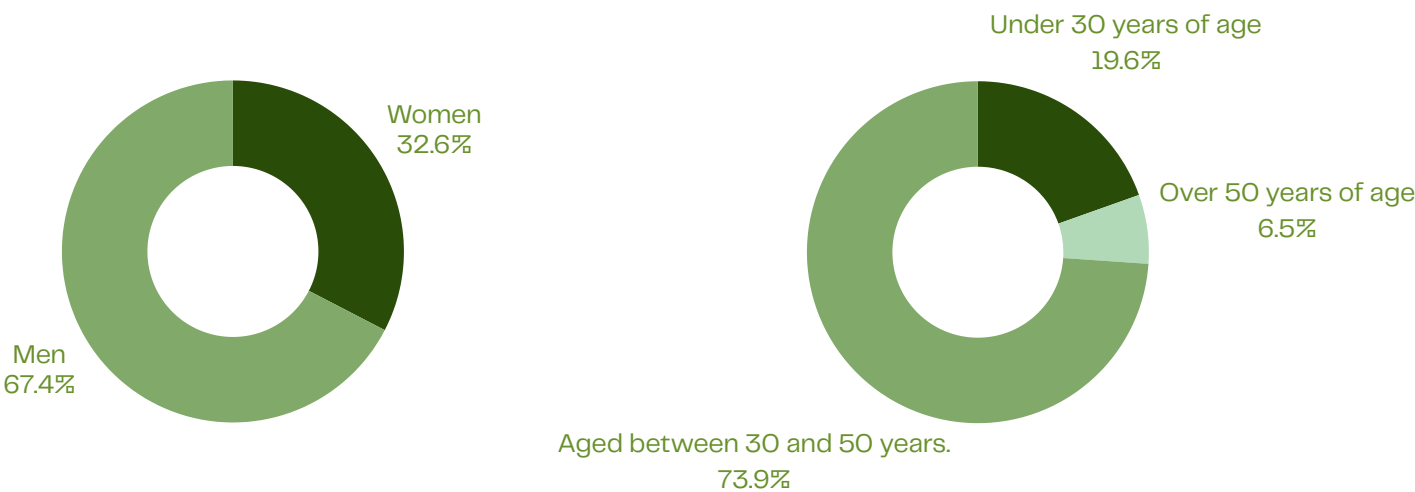
BRUC's team is located in Spain, where the Group currently has its business. In this regard, in relation to employment contracts, 100% of BRUC's workforce is under the Collective Bargaining Agreement for offices and offices in Madrid[6].

Diversity and equitable opportunities

BRUC, aware that the creation of value in an ethical and sustainable manner is one of its main values and that without the support of a qualified, diverse and motivated human team it would not be possible to achieve the strategic goals of the Group, expresses its total commitment to diversity and equal opportunities, as well as to transparency, impartiality and objectivity in attracting and retaining talent.

BRUC has in place a Code of Conduct that guarantees equality and zero tolerance for direct or indirect discrimination based on sex, race, nationality, language, origin, personal convictions, marital status, disability or health, or for any other reason whatsoever. This commitment is complemented by the Sustainability Policy, as well as the Diversity and Equality Policy, which sets out the Group's commitments in relation to diversity and equality of treatment and opportunities, and the Professional Selection and Recruitment Policy, the purpose of which is to guarantee the attraction, selection and retention of the most suitable talent for BRUC, ensuring equal opportunities and diversity at all levels of the organization.

BRUC's commitment to diversity and equal opportunities is demonstrated in the composition of the team:



BRUC declares its zero tolerance with workplace harassment and puts all the measures within its reach to eradicate this type of practices, through different mechanisms such as training its professionals, promoting the use of inclusive language and the disciplinary system established by the Group in case of this type of practices.

It should be noted that during the year 2024 no discrimination or harassment of any kind has been detected, nor has any complaint or accusation been received in relation to non-compliance with the Company's social policies.

[5] The calculation encompasses employees who maintain an employment relationship with BRUC. Consequently, CEO and directors are excluded.

[6] Resolution dated July 22, 2022, issued by the General Directorate of Labor of the Ministry of Economy, Finance, and Employment, concerning the registration, deposit, and publication of the Collective Agreement for the Office and Desk Sector.

Remuneration

BRUC's remuneration policy is based on an approach of equity and fairness, where economic compensation is established according to the job position, the associated responsibilities and the skills, experience and performance of each professional, guaranteeing equality and non-discrimination based on gender, race, nationality, language, marital status, disability or health.

The Company places particular emphasis on ensuring that the salary allocation process is transparent and based on objective criteria, ensuring that all professionals, regardless of their role, have an equal opportunity to receive compensation commensurate with their capabilities and contributions to the Group.

By 2024, BRUC's salary gap has risen to 4.60% [7], demonstrating BRUC's firm commitment to equal opportunities.

The Company focuses on attracting and retaining talent, and therefore, in addition to the established fixed remuneration, all professionals receive an annual variable remuneration linked to the achievement of the Company's objectives and the professional performance of each one, determined through periodic evaluations. It is important to note that a percentage of the variable remuneration of all professionals is linked to the Company's annual ESG objectives.

Additionally, BRUC offers non-salary benefits such as medical insurance for professionals and their immediate families, demonstrating its commitment to the well-being of its team.

Corporate culture and workplace environment

BRUC has built a strong corporate culture based on the principles of collaboration, mutual respect and constant communication. The Company understands that a good working environment is essential for the well-being of its professionals and collective success, so it focuses on creating an environment in which all team members feel valued, listened to and committed. It is crucial for the Group to keep its entire team informed and aligned with the organization's strategy and objectives. This not only fosters transparency, but also ensures that each person, regardless of their role or area of work, can actively contribute to the achievement of the common objectives, feeling that their work has a direct impact on BRUC's success.

One of the main evidences of the good working environment at BRUC is the low staff turnover, a clear indicator of satisfaction and stability within the team. This low level of turnover not only reflects the commitment of the professionals to the Company, but also demonstrates that BRUC has managed to generate a work environment where the sense of belonging is a fundamental value. Talent retention is key to BRUC's growth, and this is only possible when relationships of trust, respect and integrity are created.



In addition, BRUC recognizes that the well-being of its professionals is an essential aspect of maintaining a motivating and healthy work environment. For this reason, the Company organizes teambuilding and wellness activities that allow team members to strengthen their interpersonal relationships and improve cohesion between the different departments. By promoting a relaxed and balanced environment, BRUC contributes to the emotional and psychological health of its team, which translates into greater productivity, creativity and motivation. As an example, part of the BRUC team participated in the Madrid 2024 Companies Race, an event in which a strong sense of collaboration was experienced among all participants.

In short, the Group strives to create an environment where each team member can develop both personally and professionally, and where the sense of community is as important as individual achievements. At BRUC, it is believed that only through constant collaboration and teamwork can we continue to grow as an organization and overcome the challenges of the future.

6 Care and protection of people

The safety of the professionals who collaborate with BRUC is a fundamental priority for the Group in the development of its activity. The Company considers that the well-being and protection of its employees, contractors and all the people who interact with BRUC is essential for the success and sustainability of its operations. For this reason, BRUC rigorously complies with current legislation on occupational health and safety, implementing all necessary measures to ensure a safe working environment. In addition, the collective bargaining agreement that regulates the employment contracts of BRUC professionals contains specific provisions that guarantee occupational health and safety.

BRUC has adopted a comprehensive approach to ensure safe and healthy working conditions. The Company is committed to raising the levels of safety, health and well-being within the organization, in order to create a work environment that not only complies with legal requirements, but also promotes a **culture of prevention**. This commitment is reinforced by the Occupational Health and Safety Policy, which establishes the principles and guidelines for managing occupational risks. In line with international standards, the Company's policy aims to identify, manage and control the risks to which BRUC is exposed, ensuring that professionals and collaborators are protected at all times, which in turn supports the achievement of corporate objectives. In this way, it seeks to provide the highest level of security and trust, ensuring that all activities are carried out in a controlled and safe environment.

This commitment to safety extends beyond BRUC's professionals, encompassing also contractors and suppliers operating in the workplaces under the Company's responsibility. BRUC requires its collaborators to comply with the same safety and health standards, ensuring that all those involved in its projects are duly protected and communicates to all of them its Occupational Health and Safety Policy as well as its commitments and objectives.

Occupational risk prevention is addressed through a proactive approach that includes continuous training in occupational health and safety, as well as periodic audits to verify that all safety regulations are strictly complied with. This comprehensive approach ensures that safety standards are not only met, but also constantly reinforced.

In 2024, BRUC provided a total of **3,570 hours** of occupational health and safety training, a reflection of the Group's commitment to training its staff in accident prevention. Safety information and awareness is essential to ensure that all workers are prepared to identify risks and act appropriately. Training covers a wide range of topics, including accident prevention both on projects and in the office, first aid, firefighting and construction-specific safety measures. These training actions are essential to ensure that all personnel, including contractors and suppliers, are fully informed and trained to handle risk situations.

Own employees		
	Men	Women
Occupational accidents	0	0
Absenteeism due to occupational accidents	0	0

Indirect employees [8]			
	O&M	Construction	Total
Occupational accidents	0	21	21
LTIFR (nº accidents with sick leave * 1,000,000) / nº hours worked)	0	11.34	10.77
Severity rate (no. days lost due to accidents with sick leave * 1,000) / no. hours worked)	0	0.15	0.14
Absenteeism due to occupational accidents	0	0.12	0.11

[8] Rates below average construction industry rates in Spain (LTIFR: 36.5; severity rate: 1.34).

Fundamental principles

At BRUC, respect for and protection of human and labor rights is essential in all interactions with its stakeholders. The Company rejects any form of forced or compulsory labor and is committed to eradicating discrimination in employment and occupation, as well as to the effective abolition of child labor.

Global commitment

BRUC is a participant in the United Nations Global Compact and complies with all relevant regulations and standards concerning the respect for human rights. Additionally, it advocates for its stakeholders to uphold the principles outlined in:

- The United Nations International Bill of Human Rights
- The OECD Guidelines for Multinational Enterprises.
- The ILO Declaration and its core conventions
- The European Convention on Human Rights

Internal policies and regulations

The Group has established a comprehensive framework of corporate standards and policies that uphold respect for human rights. Its strategy focuses on mitigating risks related to human rights by:

- Risk identification
- Compliance evaluations and audits of your suppliers
- Promoting engagement and awareness
- Facilitating communication channels for grievances and claims

Stakeholder accountability

BRUC requires that all its stakeholders uphold the same respect for human rights as the Group and adhere to all relevant legislation and standards.

Code of conduct

The Company has in force its Code of Conduct, wherein respect for human rights constitutes one of its fundamental pillars.

Additionally, the Group has the Supplier Code that requires all collaborating suppliers to uphold human rights in accordance with BRUC's standards.

Supplier assessment protocol

BRUC has established a comprehensive due diligence procedure, conducting regular evaluations to ensure that its suppliers uphold human rights across all operations. Throughout the reporting period, these evaluations have not revealed any risks of human rights violations or instances of forced or child labor.

BRUC's due diligence process is conducted in the following phases:

- Information search: An analysis of the supplier's financial and non-financial data is conducted, encompassing the location of its facilities, its public reputation, and any other pertinent information that facilitates the evaluation of its performance regarding sustainability and social responsibility.
- Acceptance of the Supplier Code: The supplier is required to provide written acceptance of BRUC's Supplier Code, which encompasses a commitment to adhere to relevant legislation and international regulations pertaining to human rights, in addition to the obligations undertaken by the Group.
- Annual completion of the evaluation questionnaire: Suppliers are required to complete an annual evaluation questionnaire that addresses environmental, social, labor, human rights, and governance aspects, among others. This process enables BRUC to gain a comprehensive understanding of its suppliers' adherence to ethical and sustainable standards.
- Inspections: BRUC guarantees that its suppliers adhere to the Group's corporate standards and policies through on-site evaluations of their facilities. These evaluations may be conducted either by the BRUC team or by independent third parties. Inspections encompass the assessment of compliance with contractual specifications, the working conditions of employees, the respect for human rights, and the condition of the facilities, among other factors.

2024 Activities report

During the fiscal year 2024, the Company has not received any complaints regarding human rights violations, nor has it identified any practices that contravene its corporate rules and policies or international regulations and standards.

Ethics Channel

BRUC has implemented an Ethics Channel for the reporting of any unethical or illegal activities. This channel can be accessed via the following link: <https://brucenergy.integrityline.com>. Further information regarding the operation of the Ethics Channel is available in the subsequent section.

Engagement with local communities is key to building strong and sustainable relationships, and is essential to ensuring that companies act responsibly and contribute to collective well-being. This engagement involves not only listening and responding to community needs, but also understanding local dynamics, respecting their cultures and working to foster inclusive development. BRUC adopts a business strategy focused on value creation, recognizing that local communities are a key stakeholder for the success of its projects.

In this regard, the Group is committed to generating significant socioeconomic benefits for communities, promoting job creation and developing social initiatives that address the specific needs of each region. Through these actions, BRUC promotes local and rural development, contributing to the improvement of the quality of life of the municipalities in which it is present.

It should be noted that before starting any project, BRUC carries out an evaluation of the social and environmental impacts in the area, in order to identify and mitigate possible negative effects, as well as to maximize the benefits for the community. In addition, the Company analyzes the particular needs of each region, ensuring that its intervention contributes effectively to the sustainable and balanced development of local communities.

Additionally, BRUC is fully committed to education and training, allocating resources for the professional development of its employees and other stakeholders. In this sense, the Company promotes various collaboration initiatives with schools located in the areas where BRUC has projects, with the aim of training and qualifying people in the renewable energy sector. These initiatives include, among others, the organization of educational workshops and on-site practical training in the projects. In this way, students from the schools with which BRUC collaborates have the opportunity to understand first-hand how the projects work, acquiring a practical and direct vision of the renewable energy industry.

Environmental benefits

On the environmental front, BRUC also brings significant benefits. In addition to reducing carbon dioxide emissions, reducing electricity dependence and lowering the cost of the electricity mix, the Company collaborates with local associations and entities to integrate agricultural and livestock activities that coexist harmoniously with the projects.

Economic development

From an economic perspective, BRUC contributes significantly to local development through the payment of taxes and fees of different kinds, which actively contributes to the revitalization of rural life, combating depopulation and favoring economic development in these areas. For example, in the development of a project, the regions where it is located receive income from the ICIO (Construction Tax), the Business Activity Tax, the urban planning license fee and, in some regions, the environmental tax. These amounts, together with other taxes such as Real Estate Tax or specific fees, constitute an important source of resources for the municipalities that host BRUC projects.

Fluid communication and dynamic dialogue

For BRUC, transparency in communication with its stakeholders is fundamental. One of the Company's main commitments is to maintain open, fluid and continuous communication, especially with local communities, which are considered a priority stakeholder group.

The Company ensures that the regions where projects are located have access to clear and updated information on its activities, projects and operations. In order to foster a close relationship based on trust, BRUC has implemented various communication mechanisms, guaranteeing the availability, immediacy, truthfulness and transparency of the information provided. These channels allow local communities to be informed and actively participate in the development of projects that may impact them, promoting an environment of collaboration and constant dialogue.



Local employment creation

Job creation is a fundamental pillar of BRUC's commitment to local communities. By providing local job opportunities, promoting inclusive hiring and offering fair working conditions, companies not only strengthen the local economy, but also improve the quality of life for residents.

BRUC prioritizes the hiring of local staff, both for project construction and operation and for the procurement of supplies, whenever possible, which boosts the economy and employment in the region.

In 2024, BRUC had a total of 1,280 people employed through its contractors in the construction and operation of its projects, in addition to the direct employment of the Group's in-house professionals.



7. Financial management and good governance

Beyond strict compliance with current legislation, BRUC has among its values ethics and good business practices, applying them in its day-to-day business and in its corporate strategy. The Company understands that responsible business management implies acting with integrity, transparency and commitment to social and environmental well-being.

BRUC has a governance model designed to integrate the management of financial and non-financial risks, opportunities and material impacts in decision-making, aligning the operation of its governing bodies with current applicable legislation and best practices, with the ultimate goal of advancing its growth in a sustainable manner and fulfilling its strategic plan.

Over the last few years, BRUC has been working on the improvement and robustness of its governance model, reinforcing the Company's regulatory framework, in line with market best practices and its ESG strategy, and adapting its governance bodies to that effect.

BOARD OF DIRECTORS

BRUC's Board of Directors is the body delegated by the General Shareholders' Meeting for the administration and management of the Company, acting as the highest decision-making body. Its main mission is to direct and manage BRUC's activities, making the key strategic and operational decisions that guide the Company's course.

Within its functions, the Board is responsible for approving and supervising the Company's general strategy, as well as ensuring that the established objectives are met. It is also responsible for formulating the policies that guide all of the organization's activities. In terms of sustainability and ESG, the Board of Directors has a fundamental role in approving and overseeing BRUC's policies, strategies and objectives, ensuring that the Company acts in a responsible and sustainable manner.

BRUC's Board of Directors is composed of six members, one of whom serves as Chairman. All members of the Board of Directors have extensive experience in the renewable asset investment sector and in business management, enabling them to make strategic decisions for the growth and success of the Group. In terms of gender diversity, female representation on the Board is 16.66%.

The position of director in BRUC is for an indefinite period of time and is not remunerated, which provides stability and continuity in the strategic direction of the Company. In addition, to ensure adequate corporate governance, BRUC has two delegated committees of the Board of Directors: the Audit Committee and the Appointments and Remuneration Committee. These committees are responsible for assisting the Board in specific areas, ensuring proper supervision of financial matters and the management of the Group's professionals.

Compliance framework

Code of Conduct: Outlines BRUC's business ethics and compliance framework, implemented through policies, standards, processes, and controls. It is applicable to all stakeholders of the Company. The Code of Conduct was approved in 2023 and updated in 2024.

Sustainability Policy: It sets out BRUC's vision and focus areas in relation to ESG issues and outlines the basic principles and objectives for the Company and stakeholders in each of its projects, businesses and activities, regardless of where they are carried out. The policy was approved in 2023 and updated in 2024.

Supplier's Code: Its objective is to develop the principles and values that the Group has established in its Code of Conduct, which inspire BRUC's relations with its suppliers, being configured as an action guide to which suppliers must adhere. It was approved in 2024.

Compliance Policy: It establishes the comprehensive framework for action regarding corrupt practices and bribery, the regime for offering and receiving gifts, presents and invitations, situations that may involve a conflict of interest, fraud and money laundering operations. It applies to all of the Company's stakeholders. It was approved in 2024.

Equality and Diversity Policy: This document outlines the objectives and measures established by BRUC to promote diversity and ensure equal treatment and opportunities for women and men in the workplace. The policy was approved in 2024.

Occupational Health and Safety Policy: The purpose of the policy is to establish, in line with international reference standards, the principles and guidelines for action and how to manage the risks associated with occupational health and safety in order to support the achievement of corporate objectives through the identification, management and control of those risks to which BRUC is exposed. The policy was approved in 2024.

Selection and hiring protocol: It establishes the comprehensive framework for the selection and hiring 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. The policy was approved in 2024.

For BRUC, creating value in an ethical and sustainable manner is an essential principle guiding all its operations. This approach extends beyond its own internal processes. Therefore, the Company expects its suppliers to follow the same commitment to responsible and sustainable performance, aligning themselves with the principles and guidelines set out in its Code of Conduct.

In addition to this ethical commitment, BRUC is fully aware of the importance of exhaustive monitoring of its entire value chain. The Company conducts due diligence to identify, assess and manage the risks inherent in its supply chain, recognizing that effective risk management is critical to both the success of its projects and the protection of its corporate reputation.

As part of its efforts to strengthen its commitment in this area, during 2024 BRUC has approved its Supplier Code, a key document that sets out the standards that suppliers must meet in relation to their business practices. The Supplier Code is included in all contracts and suppliers are required to accept, adhere to and comply with its principles, creating a contractual framework that reinforces shared responsibility for risk management.

BRUC not only expects its suppliers to follow these principles superficially in their relationship with the Group, but also to promote a culture of compliance within their own organizations and among their employees, contractors and collaborators. In this regard, the Company considers it essential that suppliers take responsibility for ensuring that all actors within their supply chain uphold the same ethical and compliance standards that BRUC requires. This includes adopting measures to ensure compliance with norms and standards related to the environment, occupational safety, non-discrimination and the protection of human rights.

In order to ensure that the Group's suppliers comply with applicable regulations, the Supplier Code and international standards, BRUC has conducted comprehensive compliance assessments, focusing on suppliers that represent the greatest impact in terms of CAPEX for the Group, since they are the suppliers that have the greatest relevance in the development of BRUC's activities and, therefore, in the fulfillment of the business strategy.

Through these compliance evaluations, BRUC seeks to identify possible areas for improvement, implement corrective action plans if necessary, and ensure the traceability of its suppliers' practices in relation to the established ethical and sustainability standards. This process also enables it to proactively manage the risks associated with its activities and to optimize long-term collaboration with its business partners, thus strengthening mutual trust. With this methodology, BRUC not only complies with its legal obligations, but also fosters a corporate culture that promotes social and environmental responsibility, generating a positive impact on both its projects and the communities where it operates.

All the evaluations carried out during the year 2024 have concluded satisfactorily, not detecting in any case any risks or situations that could be detrimental to BRUC or its activities.

It should also be noted that the companies with which the Group collaborates are recognized top-tier companies in their respective industries, which not only guarantees high quality and reliability in the products and services they supply, but also shows a high degree of commitment on their part in terms of good business practices, innovation and commitment to sustainability and good governance.

By working with these world-class organizations, BRUC is able not only to meet regulatory requirements, but also to advance its sustainability strategy, reduce operational risks and foster a culture of continuous improvement throughout the supply chain.

BRUC is aware that it is exposed to a number of risks, both financial and non-financial, which may affect its business, performance and reputation. To meet these challenges, the Company is currently engaged in a phase of implementing a robust risk management system. This system is being designed to support the integrity of internal control processes, ensure proper decision making by the Group's management team and provide reasonable assurance regarding the presentation of reliable information to the markets. The implementation of the risk management system is aligned with the highest international standards and the most demanding regulatory requirements, adapting to the needs of the current and future regulatory environment.

BRUC's approach to risk management aims not only to identify and mitigate the risks inherent in its activities, but also to anticipate them in the definition of the Group's strategy and to promote sustained and solid growth, both in quantitative and qualitative terms. The Company is committed to strengthening its decision-making capabilities, with a clear focus on the transparency and reliability of the information presented to the markets and stakeholders, and has therefore begun to implement a risk management system covering both financial and non-financial risks to which the Group is exposed. In this regard, BRUC has carried out a preliminary analysis of climate risks during 2024, which can be consulted in section 5 of this Report.

BRUC's Board of Directors plays a fundamental role in safeguarding the Company's ability to mitigate risks effectively and will be the highest supervisory body of the risk management system. In this regard, The Board of Directors has the mission to protect and enhance the value of BRUC in all its areas of operation, by implementing control measures and constant monitoring of risks that may arise as the Group grows and expands. In addition, the Board of Directors drives an organizational culture that promotes risk awareness and understanding at all levels, ensuring that every member of the organization is prepared to proactively identify, assess and manage risks.

The creation of this risk-conscious culture involves not only continuous training at all hierarchical levels, but also the integration of risk management into all the Company's processes. This enables an agile and effective response to new challenges and changes in the business environment. The Company is also striving to identify and leverage synergies in its internal control procedures, thus optimizing operational efficiency and improving organizational resilience in the face of unforeseen events. In this way, BRUC ensures that risk management not only protects the Company, but also facilitates its sustainable growth and its ability to adapt to a dynamic and constantly changing business environment.

Ethics Channel

The Group has established the Ethics Channel, an internal information system through which BRUC professionals, administrators, suppliers or any third party must communicate and/or report possible criminal or administrative infractions or any illicit or unethical conduct or conduct contrary to ethics, the Code of Conduct, BRUC's corporate rules or applicable legislation committed in the context of the Group's activity of which they have knowledge or suspicion.

Access to the Ethics Channel can be made through the following route:
<https://brucenergy.integrityline.com/frontpage>.

Communications made through the Ethical Channel will be processed in accordance with the provisions of BRUC's Ethical 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.



8.1 About this report

8. Annexes

This sustainability report (the “Report” or the “Sustainability Report”) has been prepared based on the guidelines of the International Integrated Reporting Framework, the Global Reporting Initiative Guidelines, the Sustainable Development Goals, the Ten Principles of the United Nations Global Compact–of which BRUC has been a member since March 2024–, Law 11/2018 of December 28, on non-financial reporting and diversity and Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 regarding sustainability reporting by companies (CSRD), as well as the recommendations of the Taskforce on Climate-related Financial Disclosure (TCFD) and the climate scenarios of the Intergovernmental Panel on Climate Change, among other non-financial and sustainability reporting reference standards.

The publication of this Sustainability Report, for the first year and on a voluntary basis, reflects the firm commitment of Bruc Energy, S.L. (hereinafter, “BRUC”, the “Company” or the “Group”) to the environment, society and risk governance, thus consolidating the efforts made by the Company in recent years to integrate environmental, social and good governance (ESG) criteria into its strategy and as one of its core values.

This Report is also an exercise in transparency aimed at informing the Group's stakeholders about the Group's strategy, situation, activities, objectives and progress in sustainability, both internally and externally. For BRUC, communication, clarity and truthfulness of information are fundamental values.

It should be noted that this publication is voluntary, given that BRUC does not currently comply with the requirements to present the Statement of Non-Financial Information according to Law 11/2018, of December 28. It is also not bound by CSRD nor by the reporting requirements of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investments.

This report presents information and quantitative data for the year 2024, based on consolidation as of December 31, 2024 and refers to Bruc Energy, S.L. and its group of companies on a consolidated basis. Although BRUC manages the entire asset portfolio, and the Sustainability Report refers to 100% of the capacity, in relation to assets in operation, the Group owns 968 MW. Assets under construction and development are 100% owned by BRUC. Japan portfolio is immaterial for the sustainability reporting.

The Report was approved by the Board of Directors of BRUC on March, 19, 2025.

For any questions regarding the content of the Report or BRUC's sustainability strategy, please contact info@brucenergy.com.

8.2

Physical climate risks that could impact BRUC

Temperature-related risks

Risk	Description	Type	Comments
Temperature fluctuations	These are risks due to punctual changes or significant fluctuations in the temperature of air, fresh water (rivers, lakes) and sea water in a given period.	Chronic	Temperature variations impact the performance of photovoltaic (PV) modules due to their negative temperature coefficient. As the ambient temperature increases, the output power of the modules decreases, mainly due to the drop in open circuit voltage (Voc). This behavior is characteristic of the semiconductors used in PV modules, such as crystalline silicon, whose optimum efficiency is defined at 25°C under standard test conditions (STC). Likewise, temperature variations outside the optimal operating range also affect battery performance and capacity, as the chemical reactions inside the battery are altered. At higher temperatures, internal resistance increases and degradation accelerates, while at lower temperatures chemical reactions slow down, reducing charge and discharge efficiency.
Thermal strain	Damage to equipment due to extreme temperatures.	Chronic	Thermal stress, caused by extreme temperature variations between day and night, causes fatigue in the module materials, particularly in the encapsulation layers, electrical connections and solder joints. Repeated thermal expansion and contraction can generate micro-cracks in the cells, affecting structural integrity and reducing module efficiency. Over time, this phenomenon can result in premature PV cell failure and a decrease in energy production. Batteries are designed to operate within a specific temperature range. Extreme temperatures (high or low) cause thermal stress that affects the integrity of materials such as electrodes and electrolyte, which can cause premature failure and reduce the life of the storage system. This type of stress also increases the risk of leaks, short circuits or, in extreme cases, fires.
Temperature fluctuations	Refers to fluctuations in temperature over long periods of time, such as months, years or decades, considering the average changes in the climate of a region. It includes natural variations as well as seasonal changes and alterations induced by climate change.	Chronic	Temperature variability over seasons or years exposes modules to prolonged thermal cycling that accelerates material degradation. In particular, delamination of the encapsulant and corrosion of interconnections can be promoted by continuous thermal fluctuations. In addition, these fluctuations can reduce the stability of inverters, which also suffer efficiency losses under non-optimal thermal conditions. Electrical components and inverters, when subjected to these cycles, also experience thermal stresses that affect their service life. Similarly, in batteries, these thermal cycles generate fatigue in cells and insulation systems, resulting in decreased storage capacity, increased internal resistance and more maintenance cycles, as well as failures in thermal control systems.

Risk	Description	Type	Comments
Heatwave	Significant increase in temperatures.	Acute	During a heat wave, excessive temperatures cause a decrease in the efficiency of PV modules due to the increase of the operating temperature above the reference temperature. This is due to the reduction of the band gap in the semiconductors, which leads to a decrease in the open circuit voltage and, consequently, in the output power. Heat waves can also affect the cooling and ventilation systems of inverters, which must work more intensively, reducing their overall performance and increasing failure rates. Heat waves expose batteries to temperatures above their safety threshold. This can lead to overheating, accelerating internal chemical degradation, which reduces storage capacity and increases the risk of thermal failure, overcharging of cooling systems, and potentially fires. Heat waves also increase the rate of energy self-consumption due to increased demand on cooling systems.
Cold wave/frost	Severely low temperatures.	Acute	Cold spells, although they have less impact on PV module efficiency, can have an impact on energy production due to the formation of ice and snow on the module surface, which reduces the available solar irradiation. Although the temperature coefficient of the modules favors better efficiency at low temperatures, ice build-up can damage module surfaces or block solar energy collection. In addition, inverters can face start-up or operating problems at extremely low temperatures. Extremely low temperatures slow down electrochemical reactions within batteries, reducing their ability to charge and discharge. This can cause temporary power supply failures, as well as permanent damage if internal components freeze, affecting the responsiveness of the system and increasing the risk of capacity loss in the long term.
Wildfire	Fire risk in adjacent areas.	Acute	Forest fires can affect PV systems both directly and indirectly. Elevated temperatures in areas near the fire can cause overheating of modules and inverters. In addition, the accumulation of smoke and ash particles on the surface of the modules reduces the available solar irradiance, decreasing energy production. In extreme cases, fires can physically damage solar infrastructure, and proximity to fire can compromise support systems and cables, increasing the risk of electrical failure. Wildfires expose batteries to extreme heat and particulate pollutants. The increase in ambient temperature due to the fire can overheat the storage system and generate fire hazards in the batteries themselves, especially if adequate thermal protection is not in place. In addition, smoke and particulate matter can interfere with cooling and ventilation systems, affecting performance and safety.

Wind-related risks

Risk	Description	Type	Comments
Variations in wind patterns.	Gradual modifications in wind intensity, frequency, or direction resulting from long-term shifts in atmospheric conditions.	Chronic	Variations in wind patterns can impact PV installations indirectly. Increased wind speed increases the temperature differences in the modules, resulting in energy losses. In addition, very high winds can compromise the structural stability of the panels, accelerating the wear and tear of the support systems. In the case of batteries, variations in wind direction and speed can favor the accumulation of dust and particles in the ventilation and cooling systems, which increases the need for maintenance to ensure proper dissipation of energy. maintenance to ensure proper heat dissipation and avoid possible operational failures.
Cyclones, hurricanes, and typhoons	Tropical storm systems are defined by exceptionally strong winds, intense rainfall, and low atmospheric pressure.	Acute	In Spain, cyclones are infrequent phenomena, especially in the peninsula, although they can impact the Canary Islands and coastal areas of the Mediterranean. These events have the potential to damage poorly anchored photovoltaic structures and increase the risk of galloping, a phenomenon that consists of mechanical oscillations in structures subjected to sustained winds, causing repetitive stresses in anchors and supports. sustained winds, causing repetitive stresses in anchors and supports, which can lead to material fatigue. In addition, heavy rains associated with cyclones can cause flooding, affecting electrical systems and hindering access, maintenance and operation of PV plants. On the other hand, heavy rains and winds can cause short circuits or failures in electrical connections, damage ventilation and cooling systems, and increase the risk of overheating. Flooding could additionally render batteries unusable if they are not properly sealed or elevated, and extreme winds can damage control systems, increasing the risk of electric shocks or fires.
Storms (snow, dust, or sand)	Severe meteorological phenomena characterized by wind gusts accompanied by solid particles or precipitation.	Acute	Due to the proximity to the Sahara, occasional dust and sand storms are common in Spain. These storms not only reduce irradiance by accumulating particles on PV modules, but also cause abrasion on their surfaces, affecting the anti-reflective coating. In addition, the sand/dust particles can deteriorate the joints and seals of the modules, increasing the risk of infiltration. On the other hand, Spain is one of the most mountainous countries in Europe. In these and surrounding areas, snowstorms not only cover the panels, but also exert additional pressure on the structures, which can cause micro-cracks and affect the mechanical integrity of the modules. On the battery side, sandstorms can affect battery storage systems by obstructing ventilation systems, which can lead to overheating and shorten battery life. Snowstorms in mountainous areas could also interfere with proper battery operation by blocking cooling systems or making maintenance access difficult.

Water-related risks

Risk	Description	Type	Comments
Variations in the forms and patterns of precipitation (rain, hail, snow, or ice)	Variations in the quantity, frequency, and type of precipitation over time can influence water supply and impact ecosystems and human activities.	Chronic	During a heat wave, excessive temperatures cause a decrease in the efficiency of PV modules due to the increase of the operating temperature above the reference temperature (25°C). This is due to the reduction of the band gap in the semiconductors, which leads to a decrease in the open circuit voltage and, consequently, in the power output. Heat waves can also affect the cooling and ventilation systems of inverters, which must work more intensively, reducing their overall performance and increasing failure rates. Heat waves expose batteries to temperatures above their safety threshold. This can lead to overheating, accelerating internal chemical degradation, which reduces storage capacity and increases the risk of thermal failure, overcharging of cooling systems, and potentially fires. Heat waves also increase the rate of energy self-consumption due to increased demand on cooling systems.
Precipitation or hydrological fluctuations	Variations in precipitation patterns that influence the availability and distribution of water within a region.	Chronic	Cold spells, although they have less impact on PV module efficiency, can have an impact on energy production due to the formation of ice and snow on the module surface, which reduces the available solar irradiation. Although the temperature coefficient of the modules favors better efficiency at low temperatures, ice build-up can damage module surfaces or block solar energy collection. In addition, inverters can face start-up or operating problems at extremely low temperatures. Extremely low temperatures slow down electrochemical reactions within batteries, reducing their ability to charge and discharge. This can cause temporary power supply failures, as well as permanent damage if internal components freeze, affecting the responsiveness of the system and increasing the risk of capacity loss in the long term.
Increasing sea levels	Rising ocean levels, driven by the melting of glaciers and polar ice, along with the thermal expansion of water, pose a threat to coastal areas and infrastructure.	Chronic	Most PV plants in Spain are located in inland areas, due to the availability of large tracts of land suitable for large-scale installations. Coastal areas present additional challenges, such as competition for land use, more stringent environmental regulations, and greater exposure to conditions that can accelerate corrosion, such as the presence of salt in the air. Additionally, sea level rise may alter current drainage patterns leading to temporary and/or permanent flooding in the future. Therefore, we consider these risks to be relevant only when plants are located less than 20 km from the coast. This assessment is equally applicable to the battery sector, where proximity to the sea may imply similar risks.

8.2 Physical climate risks that could impact BRUC

Risk	Description	Type	Comments
Hydric stress	A scenario in which the demand for water surpasses the availability of the resource, impacting the supply of potable water, agricultural practices, and the health of ecosystems.	Chronic	Water stress affects the water supply in semi-arid regions of Spain, such as the south, where it is necessary for cleaning the panels. Dust accumulation in these areas can reduce the energy efficiency of the panels if they are not properly cleaned. Although the use of dry cleaning technologies is presented as a viable alternative, its efficiency is limited and, in some cases, can generate micro-abrasions on the surface layer of the modules if not used properly. In addition, droughts can compromise the thermal management of the batteries, resulting in a decrease in their efficiency and capacity. In Spain, cyclones are infrequent phenomena, especially in the peninsula, although they can impact the Canary Islands and coastal areas of the Mediterranean. These events have the potential to damage poorly anchored photovoltaic structures and increase the risk of “galloping”, a phenomenon that consists of mechanical oscillations in structures subjected to sustained winds, causing repetitive stresses in the structures. sustained winds, causing repetitive stresses in anchors and supports, which can lead to material fatigue. In addition, heavy rains associated with cyclones can cause flooding, affecting electrical systems and making it difficult to access, maintain and operate PV plants. On the other hand, heavy rains and winds can cause short circuits or failures in electrical connections, damage ventilation and cooling systems, and increase the risk of overheating. Floods could additionally render batteries unusable if they are not properly sealed or elevated, and extreme winds can damage control systems, increasing the risk of electric shocks or fires.
Drought	Extended durations of arid conditions, characterized by rainfall levels considerably below the average, leading to water scarcity.	Acute	
Intense precipitation (rain, hail, snow, or ice)	Precipitation events that transpire over brief intervals, resulting in significant accumulations of water, hail, or snow.	Acute	Heavy rains can generate local flooding that affects electrical systems, while hail can cause physical damage to photovoltaic modules. Snowfall, on the other hand, can block solar irradiation and thus reduce energy production until the snow melts or is removed. In addition, if not properly removed, it can generate mechanical stresses in the panels that affect their structural integrity.
Floods (riverine, pluvial, subterranean)	Flooding occurs when water inundates regions typically characterized by dryness, resulting from intense rainfall, snowmelt, or elevated sea levels.	Acute	PV plants and storage systems located near rivers or areas of poor drainage are vulnerable to flooding, which can damage their electrical and structural systems. In addition, flooding can limit access to the plants, affecting maintenance operations.

Solid mass-related risks

Risk	Description	Type	Justification
Soil Deterioration	Soil degradation refers to a decline in soil quality and productivity, frequently caused by unsustainable agricultural practices, deforestation, and urbanization.	Chronic	Soil quality is crucial for the stability of support structures and water management. Degradation can lead to reduced performance of facilities and increased risk of structural failure.
Soil Degradation	Soil erosion denotes the process of detaching the uppermost layer of soil, which may be induced by elements such as water, wind, and human activity.	Chronic	Soil erosion can compromise the stability of PV plants and battery systems, especially on land with steep topography or after changes in land use. The loss of surface layers essential for stabilization can result in landslides and affect natural and artificial drainage systems.
Landslide	Landslides entail the movement of substantial volumes of earth, posing significant challenges in regions characterized by steep inclines.	Acute	The risk of landslides is more relevant in mountainous regions and on steep slopes, which are not common locations for PV and BESS plants. Although their incidence is low compared to other risks such as soil erosion, they can cause significant damage to the infrastructure and foundations of the facilities, affecting crucial components such as electrical connections. Facilities on slopes or in areas with recent changes in land use are particularly vulnerable, as factors such as soil saturation from heavy rains can increase the likelihood of these events.
Land subsidence	Land subsidence transpires when the ground shifts downward due to a loss of support, frequently associated with human activities such as groundwater extraction or the collapse of subterranean cavities.	Acute	Land subsidence can affect photovoltaic and battery installations, although its incidence is not common in most plants in Spain. This phenomenon tends to be more relevant in areas where significant changes in land use have been made, such as in intensive construction or agriculture. Factors such as soil compaction and groundwater extraction can reduce the bearing capacity of the soil, causing instability in the foundations of the facilities. This can result in damage to infrastructure, compromising both the safety and operational efficiency of batteries and PV systems. Cracking and ground displacement can affect electrical connections, altering system performance.



BRUC

BRUC ENERGY, S.L.

Arturo Soria Street, 36, 7th Floor, 28033 – Madrid

info@brucenergy.com | www.brucenergy.com | 