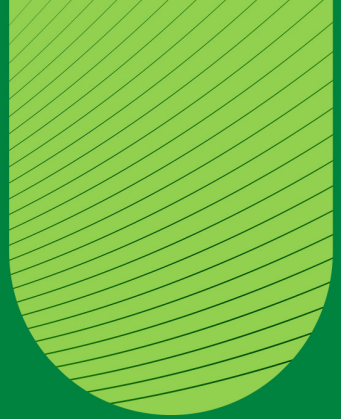


SPIC Zuma Energía

Sustainability Report 2024

Content

Interactive PDF

Message from the CEO

GRI 2-1

As CEO, it is an honor to present the sustainability report of SPIC-Zuma Energía, a key player in Mexico's energy transition.

Mexico has enormous potential in renewable energy, thanks to its privileged natural resources. According to data from the International Energy Agency (IEA), the country has one of the highest solar irradiation rates in the world, as well as strong winds in strategic regions of the Isthmus of Tehuantepec and other areas. However, the energy sector faces challenges in expanding clean generation and ensuring equitable access to energy.

At SPIC-Zuma Energía, we believe that energy should be clean, accessible, and sustainable. Through our solar and wind farms located in Sonora, Jalisco, Chihuahua, Tamaulipas, and Oaxaca, we produce renewable energy while promoting an energy model based on efficiency and environmental responsibility. We are convinced that the energy transition represents an opportunity to build a more equitable and resilient future.

With an installed capacity of 1.3 GW distributed across six solar and two wind farms, our energy production is equivalent to the amount required to meet the needs of millions of people. It avoids the emission of more than 1.5 million tons of CO_2 per year.

Globally, our company has made significant commitments such as:

Diversity in power generation:
SPIC is the first energy company in China to integrate all types of power generation, including solar PV, wind, nuclear, hydro, coal, gas, and biomass. This breadth provides a comprehensive solution for diverse energy needs.

Leadership in clean energy:
With more than 177 GW of installed clean energy capacity, SPIC is the world leader in photovoltaic, new energy and clean energy generation. We contribute to the fight against climate change and the achievement of global environmental goals.

Technological innovation:
The company is leading the "Advanced Pressurized Water Nuclear Reactor" project and the "Heavy Gas Turbine" project, both in China. It is also responsible for nearly 100 key research tasks and has 40 innovation platforms.

Integrated industrial chain:
SPIC implements water-photovoltaic projects, such as solar panels on bodies of water or the combination of solar power with hydropower, maximizing the use of infrastructure. Additionally, it utilizes green systems in the production of aluminum through electrolysis powered by clean energy, thereby significantly reducing emissions. These strategies ensure sustainable development by combining efficiency, innovation, and environmental commitment.

In Mexico, the projects are characterized by:

Safety as a priority:
We have implemented a comprehensive approach to prevent accidents. In addition, nutrition workshops, personal healthcare services, and vaccination campaigns are included to enhance the overall wellbeing of our personnel.

Community development and social inclusion:
Based on social responsibility initiatives, we conduct entrepreneurship workshops for women and implement infrastructure improvements in schools.

SPIC-Zuma Energía's business model in Mexico represents a milestone in renewable energy generation and serves as a model to follow in terms of safety, health, and social responsibility. This project is a clear example of how renewable energy can be responsibly and effectively integrated into communities, promoting a brighter future for all.

Sincerely,
Richard Xie.

About this Report

GRI 2-2, 2-3, 2-14

The preparation of the **sustainability report**, aligned with the **Global Reporting Initiative (GRI) and Sustainability Accounting Standards Board (SASB)** criteria, was commissioned by the company's CEO and is the result of the joint work of various areas of the organization, which not only participated in the identification of relevant issues, but also gathered information on SPIC (State Power Investment Corporation Limited)-Zuma Energía management indicators at its various operating centers in Mexico.

The report covers information corresponding to **six solar parks, two wind farms, and the corporate offices** located in Mexico City.

Complies with the **principles of content and quality** established by GRI standards, which include: inclusion of stakeholders, sustainability context, materiality, completeness, accuracy, balance, clarity, comparability, reliability, and timeliness.

Additionally, the principles of inclusiveness, relevance, and responsiveness established by AccountAbility in **AA1000APS** (2008) were applied.

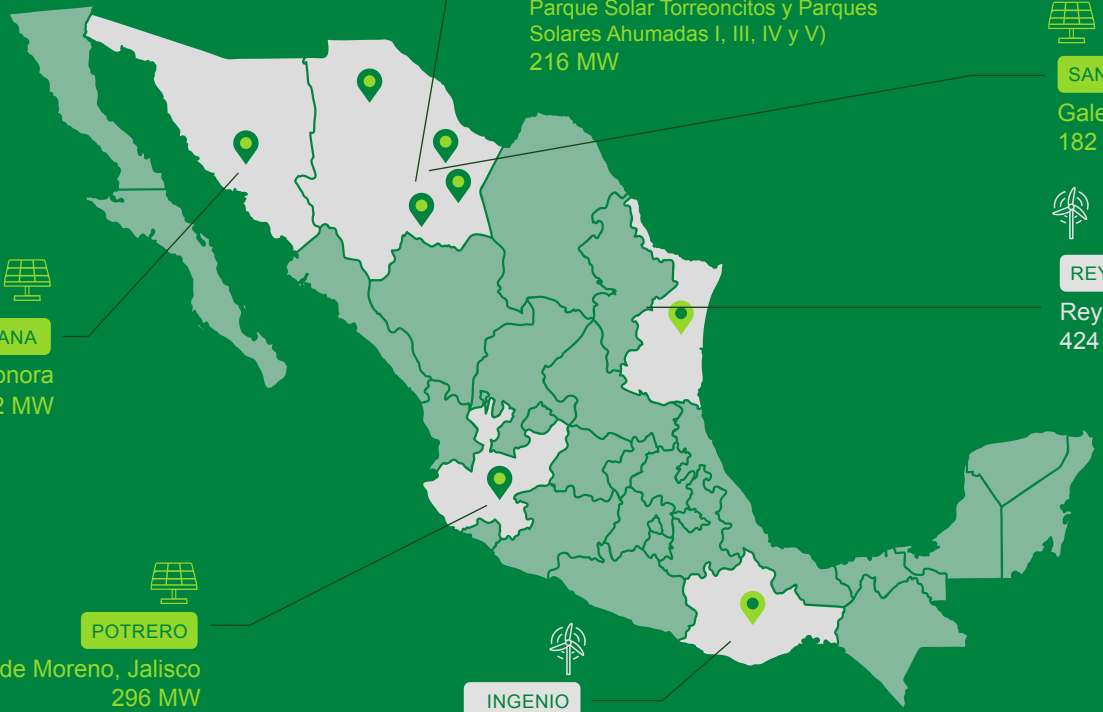
The report presents the management approach to each of the material issues identified during the materiality study conducted between July and September 2024. It also provides information on social, environmental, and economic performance for the year 2024 for all SPIC-Zuma Energía operations.

6 SOLAR PARKS

2 WIND FARMS

1 CORPORATE OFFICES

Solar parks
Wind farms



JAGUAR SOLAR
(Parque Solar Rancho El Trece, Parque Solar Torreoncitos y Parques Solares Ahumadas I, III, IV y V)
216 MW

SANTA MARÍA
Galeana, Chihuahua
182 MW

REYNOSA
Reynosa, Tamaulipas
424 MW

OREJANA
Hermosillo, Sonora
162 MW

POTRERO
Lagos de Moreno, Jalisco
296 MW

INGENIO
Santo Domingo Ingenio, Oaxaca
50 MW

Illustration 1. SPIC-Zuma Energía solar and wind farms.
Source: SPIC-Zuma Energía

Strategy for Preparing the Report
GRI 3-1, 2-29

SPIC-Zuma Energía's Sustainability Report is structured based on the relevant issues identified in the materiality study conducted between July and September 2024, which covered all the company's operations in Mexico. The results of this analysis were presented to various directors and members of the management team, who actively participated in the development of the sustainability model. This report will be published in 2025 and will serve as the conceptual basis for this report.

On January 9, 2025, all vice presidents, directors, management, and staff holding strategic positions were invited by the CEO to participate in a training session on the sustainability reporting process, aligned with the GRI and SASB standards. This training marked the beginning of the process of assigning those responsible for each indicator and defining deadlines.

Once the responsible person for each area was designated, the consultants met with them to train them on the specific requirements of each standard. The last delivery of information was made in February 2025, which formally initiated the report writing process.

Subsequently, the consultants presented the preliminary structure of the report, which was reviewed by SPIC-Zuma Energía's strategic staff to incorporate the organization's spirit and the message to be communicated to stakeholders.

As indicated, the report's organization addresses both the relevant issues identified in the materiality analysis and the management achievements recognized by each area during 2024.

Context of the Company and the Energy Industry

GRI 2-1, 2-6, 2-7

About SPIC-Zuma Energía: global presence and operation in Mexico

Since 2020, SPIC-Zuma Energía has been part of the State Power Investment Corporation Limited (SPIC) family, a global company committed to ensuring energy security and driving a more sustainable future.

SPIC is one of the largest electricity generators in the world, ranking the first in solar power generation and second in wind power. It invests in and develops safe, clean, and sustainable technology to lead the global energy transition.

The following are key facts about SPIC:

Asset scale:
approximately 259.1 billion U.S. dollars (USD), based on data available as of November 2024.

Employees:
130,000 people.

Global position:
262nd place in the list of the 500 most important companies in the world according to Fortune magazine.

First-tier subsidiaries:
67.

Total installed capacity:
249 GW, of which 70.86% comes from clean energy.

Global presence:
more than 47 countries.

GRI 2-2

SPIC-Zuma Energía is one of the main private renewable energy generators in Mexico. The company has its main offices in Mexico City and operates two wind and six solar projects across five Mexican states, with a total installed capacity of 1.33 GW.

Zuma Energía S.A. de C.V. manages the following projects in México:

- Parque Solar **Potrero**, S. de R.L. de C.V.
- Parque Solar **Santa María**, S.A.P.I. de C.V.
- Parque Solar **Orejana**, S. de R.L. de C.V.
- Parque Eólico **Reynosa** III, S.A.P.I. de C.V.
- PE **Ingenio** (1), S.A.P.I. de C.V.
- **Proyecto Jaguar** (2) (Jaguar Solar),

  Composed of the following companies:
  1. Energía Solar Sonorense, S.A. de C.V.
  2. Fotovoltaica de Ahumada, S.A. de C.V.
  3. Ahumada IV Solar PV, S.A. de C.V.
  4. Energía Eléctrica de Chihuahua, S.A. de C.V.
  5. Torreoncitos Solar PV, S.A. de C.V.
  6. Rancho el Trece Solar PV, S.A. de C.V

(1) PE Ingenio is jointly owned by SPIC-Zuma Energía and a minority shareholder.
(2) Jaguar is jointly owned by SPIC-Zuma Energía and a minority shareholder.

The Business Case in Mexico

Thanks to Mexico's commitment under the Paris Agreement, signed in November 2016, **clean energy generation has continued to increase**. Below is the data that evidences this growth in the use of clean energy in Mexico between 2017 and 2023:

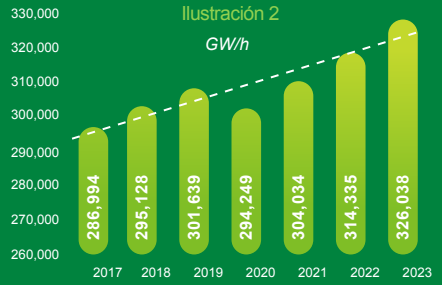


Illustration 2 Energy consumption 2017-2023.
Source: GME, based on data from CENACE (National Energy Control Center) and SENER (Ministry of Energy).

Between 2022 and 2023, Mexico's clean energy production capacity increased from 31,369 to 32,450 MW. Specifically, solar and wind generation increased from 13,456 MW to 14,525 MW. Due to its ease of installation and maintenance, solar energy has been the source with the highest cumulative growth between 2020 and 2024.

During 2023 and 2024, the Mexican energy market was impacted by extreme weather conditions. Heat waves increased electricity demand in the commercial and residential sectors, while droughts and floods reduced generation at hydroelectric plants.

Despite these challenges, the National Electric System successfully met energy demand in both years. However, this context underscores the urgency of continuing to invest in clean energy, as climate change is expected to increase electricity demand in the coming years. This demand should be met by sources that do not generate Greenhouse Gases (GHG), considered one of the leading causes of global warming.

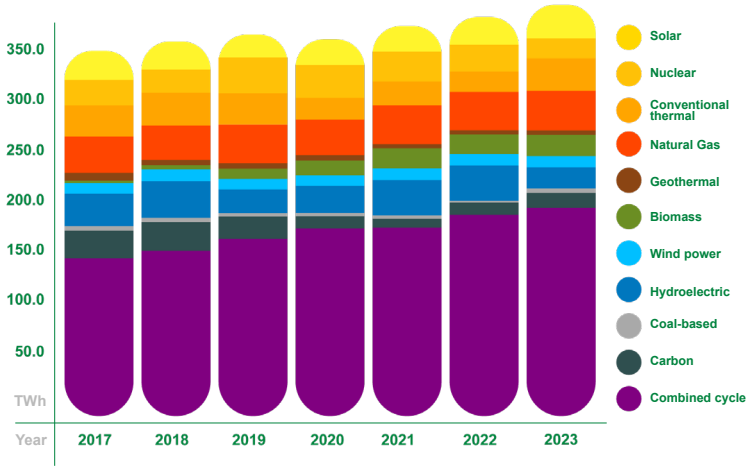


Illustration 3 Energy generation by type (2017-2023).
Source: GME, elaboration based on data from the National Energy Control Center (CENACE) and the Ministry of Energy (SENER).

According to official 2024 data from the Mexican Wind Energy Association (AMDEE), 71 wind farms are operating in Mexico, distributed in 15 states, representing 8.26% of the installed capacity with a total of 7,413 MW. Additionally, there are 63 photovoltaic solar parks located in 20 states across the country.

Currently, most of the energy produced in Mexico comes from natural gas and combined cycle plants, which represent approximately 55% of total energy generation.

Power generation represents a key issue for the country in terms of:

- **Guaranteeing universal access to energy.**
- **Meeting clean energy generation goals.**
- **Strategically planning the development of the National Electric System.**
- **Achieving energy self-sufficiency.**
- **Strengthen energy resilience.**

Despite its growth in clean energy capacity, Mexico has yet to meet its established targets. Advancing the energy transition requires addressing key challenges and opportunities across five priority areas, each demanding focused attention:

01 Include diverse social actors to advance towards a just energy transition, which enables closing gaps and guarantees universal access to and quality of electricity service.

02 Recognize that hydroelectric energy is not a viable option in the face of water stress, droughts, and floods that affect a large part of the Mexican territory.

03 Invest in and modernize electricity transmission infrastructure to ensure the efficient operation of renewable generation systems.

04 Implement digital technologies for energy management to ensure efficient generation, transmission, and distribution of energy.

05 Harness the potential of green hydrogen as a key alternative to diversify the country's energy matrix.

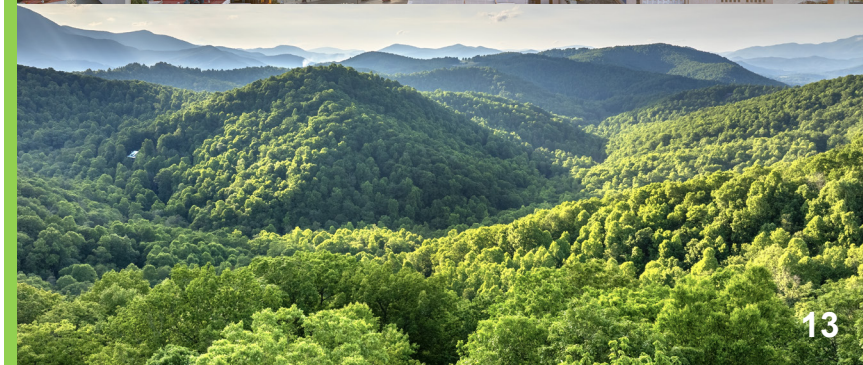
Materiality Study
GRI 3-1, 3-2, 3-3

A materiality study aims to identify the most relevant ESG (environmental, social, and governance) issues. This assessment serves as the foundation for designing SPIC-Zuma Energía's sustainability strategy and for communicating it clearly and effectively to stakeholders.

Both GRI and SASB agree that the materiality process consists of identifying the most significant issues; however, their approaches differ:

GRI seeks to identify the most significant impacts of the organization on all its stakeholders.

SASB, on the other hand, provides investors with detailed information on the impacts of the company on its stakeholders that may affect its financial and operating position.



Simple or financial materiality incorporates the perspective of risk rating agencies and senior management as a basis for identifying, managing, and disclosing the most relevant ESG issues. The materiality study conducted in 2024 identified the problems that affect, or may affect, the organization's ability to generate economic value in the short, medium, and long term, considering the risks and opportunities arising from its operating environment.

The concept of financial materiality has been adopted and developed by various international organizations and initiatives that promote sustainability reporting, including the European Commission (EC), the International Financial Reporting Standards (IFRS), and the Global Reporting Initiative (GRI).

Methodology

The simple materiality study was conducted using the following methodology:

01 **Understand the context of the organization.**

02 **Identify actual and potential impacts.**

03 **Evaluate and prioritize impacts.**

04 **Present the information through a materiality matrix.**

To gather the information, a reference framework was developed based on the ESG variables considered relevant to the sector by risk rating agencies. This framework guided the selection of the indicators used in the interviews, which in a simple materiality study are specifically aimed at decision-makers.

To understand the organizational context and identify potential impacts, we reviewed information from international risk rating agencies, the Global Risk Report 2024, the government data on energy production, and interviews with specialists in the energy industry.

Based on this context and the identification of risks, the **materiality interview** was structured and conducted with 17 key directors and members of the management team. The questions focused on the following aspects:

- **Relationship of the collaborator with the company**
- **Opinion on the operations and management of ESG issues**
- **Perception of the company's communication effectiveness**
- **Prioritization of material issues**
- **Overall assessment of the company**

Overall Objectives

01

Align sustainability strategy with commitments, objectives, and resource allocation, considering the relevance of the identified issues.

02

Strengthen ties with stakeholders, recognizing their differences and similarities.

03

Strengthen the sustainability report to prioritize and structure the information strategically, thereby contributing to the organization's positioning and reputation.

The most relevant issues for industries in the renewable energy sector are:

1.Energy management

Companies in the sector must generate renewable energy to contribute to the energy transition in the countries where they operate. Clean energy provides a viable alternative for private companies seeking to reduce their reliance on energy derived from burning fossil fuels. To remain competitive, companies must ensure that wind turbines and/or solar panels are in optimal condition and establish processes and procedures that guarantee the accurate estimation of energy generation.

2. Greenhouse Gases (GHG) and Net Zero

Contracting companies are seeking to reduce their Scope 1 and 2 emissions, and some have committed to achieving net-zero status. The purchase of clean energy is one of the main strategies to achieve this goal. Other measures include the purchase of carbon credits and the implementation of energy efficiency processes. It is essential that generating companies meet the energy sales targets agreed with their customers.

3. Health and Safety in Operations and Supply Chain

The maintenance of solar panels and wind turbines can be carried out by external operating companies or by internal personnel. In both cases, the health and safety risks are high, including falls from height, fires due to short circuits, and other electrical hazards. If these risks materialize, they can cause fatalities or affect the quality of life of individuals and their families. It is therefore essential to have occupational health management systems in place to ensure the wellbeing of your personnel.

4. Relationship with stakeholders and communities

Both wind turbines and solar panels require critical materials for their construction, the availability of which is limited globally and subject to geopolitical tensions in the countries of origin. Additionally, there are technical challenges, including the discontinuation of specific solar panel models that met key specifications. Generating companies must be able to adapt to these conditions and have alternatives that ensure continuity in the production of clean energy.

5. Waste and hazardous materials management

The useful life of solar panels and wind turbines ranges between 20 and 30 years. Therefore, companies must have specific plans for the disposal, recycling, or recovery of their infrastructure at the end of its life cycle.

6. Relationship with stakeholders and communities

A social license is a key determinant in the development and operation of energy projects, including both renewable and non-renewable ones. Companies must establish clear procedures and methodologies to identify, listen to, and address the concerns of communities and stakeholders in their areas of influence, ensuring effective communication and responsible management of their demands.

Other issues identified as specific to the organization are:

Leadership and communication

Cultural management

Harmonious growth

Development and training plans

Legal and regulatory compliance

Labor benefits

The most relevant issues, as identified by the organization and risk rating agencies, are:

1.Energy generation
2. Health and safety conditions
3. Staff welfare and development
4. Community relations
5. Ethics and human rights

Second-order of importance issues:

6. Cyber threats and data protection.
7. Conflicts of interest and unfair competition
8. GHG emissions and Net Zero.
9. Ecological impacts of project development
10. Corporate governance
11. Government relations

Issues for the organization to plan and monitor:

12. Materials sourcing and efficiency.
13. Waste and hazardous materials

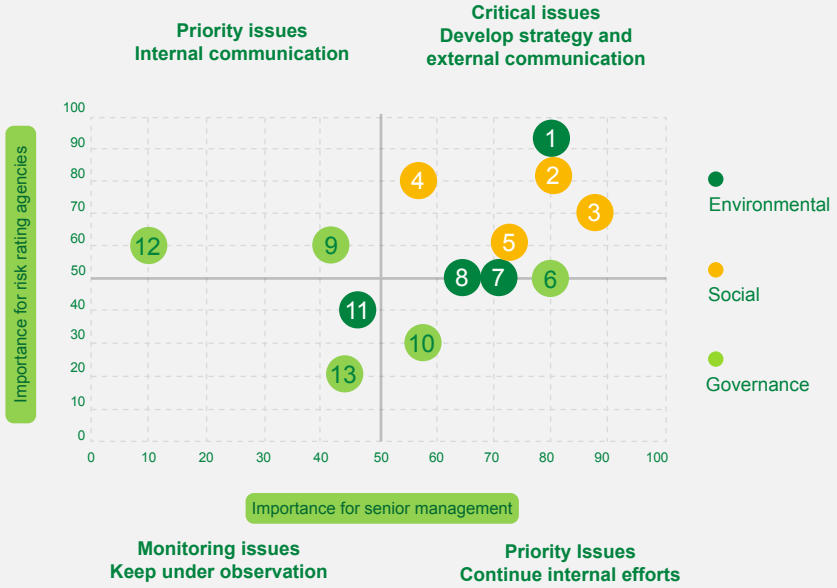


Illustration4 Materiality Matrix
Source: SPIC-Zuma Energía

Sustainability and Sustainable Development Goals

GRI 2-22

MISSION
To drive a sustainable and clean future.

VISION
To be the leading provider of clean, innovative, and low-carbon energy solutions.

VALUES
· Green balance
· Innovation in action
· Brilliant excellence

Sustainability Strategy

SPIC-Zuma Energía has integrated the principle of sustainability into its corporate values, as detailed below:

In 2024, the strategy, aligned with our mission, vision, and values, was further developed through actions such as conducting a **materiality study** and obtaining the **Socially Responsible Company** (ESR) **Distinction**, granted by the Mexican Center for Philanthropy (CEMEFI).

Progress was also made in defining the **pillars for building** a solid **sustainability model**, capable of managing and communicating relevant issues to SPIC-Zuma Energía's stakeholders, based on the following central idea:

"We transform today, we care always, and we develop a bright future."

WE TRANSFORM TODAY

This principle focuses on innovation and energy efficiency, aiming to harness the power of nature to generate clean energy, promote the energy transition, and contribute to Mexico's decarbonization.

STRATEGIES

- Implement advanced technologies in wind and photovoltaic energy to maximize efficiency and minimize environmental impact.
- Digitize and automate processes for a more sustainable and efficient operation.

INDICATORS

- Percentage reduction of CO_2 emissions per MWh generated.
- Installed renewable energy capacity.

WE ALWAYS TAKE CARE

This axis is oriented toward social and environmental responsibility. The objective is to foster safe and ethical work environments, strengthen relationships with stakeholders, and ensure environmental protection in operations.

STRATEGIES

- Occupational safety and wellness programs for employees.
- Transparency and dialogue with local communities and authorities.
- Efficient management of water use and waste reduction in the operation.
- Biodiversity conservation in areas of impact.

INDICATORS

- Index of occupational safety and wellbeing of employees.
- Satisfaction levels of communities and stakeholders.
- Amount of natural resources preserved and recovered.

WE DEVELOP A BRIGHT FUTURE

This principle is oriented toward business development and community strengthening. It seeks to consolidate its operations through innovation, strategic alliances, market consolidation, and projects that drive local sustainable development.

STRATEGIES

- Develop sustainable financial models that ensure the business's profitability.
- Establish strategic alliances with key players in the energy and technology sector.
- Diversify the portfolio with innovative solutions in clean energy.
- Promote training and employment in the renewable energy sector within local communities.
- Invest in infrastructure and basic services in areas close to the operation.
- Promote local economic development projects.

INDICATORS

- Profitability and return on investment in renewable energy projects.
- Number of strategic alliances and contracts secured.
- Number of jobs generated in local communities.
- Investment in community development programs.

We plan to establish mechanisms to ensure compliance with these strategies and indicators once the sustainability model is approved and published by senior management.

Control mechanisms include:

01 • Periodic audits.

02 • Environmental and social impact reports.

03 • Establishment of a comprehensive management system.

Sustainable Development Goals (SDGs)

Although specific metrics are not yet available to accurately determine the degree of contribution to the Sustainable Development Goals (SDGs), some of the actions implemented are listed below, as well as the metrics that are expected to be included in the 2025 report, to evaluate the company's contribution with greater certainty:

SDG 3: Health and Wellness
SPIC-Zuma Energía operates a clinic in the municipalities of Lagos de Moreno and Unión de San Antonio, providing primary-level medical care to local inhabitants and working individuals in the area. Services include consultations, diagnosis and follow-up, issuance of medical certificates, prescription of treatments, and administration of medications. During 2024, 1,370 people attended.

SDG 4: Quality Education
In locations such as Reynosa, Orejana, Santa María, and the Jaguar Project, educational initiatives are being implemented to incorporate renewable energy content into local school curricula, promoting technical knowledge and environmental awareness from an early age.

SDG 7: Affordable and Clean Energy
SPIC-Zuma Energía has acquired and put into operation solar and wind farms to increase Mexico's renewable energy generation capacity, thereby contributing to the country's energy transition.

SDG 15: Life of terrestrial ecosystems
The company has identified the species present at its operating sites and established procedures to monitor their populations and promote their conservation, in line with the principles of biodiversity protection.

Corporate Governance at SPIC-Zuma Energía

GRI 2-9

Governance Structure and Committees

SPIC-Zuma Energía is the holding company for the projects in Mexico. Its governance structure consists of the following elements (GRI 2-9):

SHAREHOLDERS´ MEETING
Makes fundamental decisions for the company under the company's bylaws and the Delegation of Authority document.

BOARD OF DIRECTORS
Responsible for defining strategic decisions, as established in the Delegation of Authority, which regulates the responsibilities and interactions between the shareholders, the Board, and the General Management of SPIC-Zuma Energía.

GENERAL MANAGEMENT
Headed by the CEO (Chief Executive Officer) and composed of three vice presidents, in addition to various area directors and deputy directors.

COMMITTEES
Support strategic decision-making in key areas such as compliance, risk, evaluation, compensation, and nomination. Additionally, there are two specialized committees within the purchasing area processes: the Virtual Procurement Leadership Committee and the Evaluation Committee.

POLICIES AND PROCEDURES
Issued by each area, govern the operation of the company under the principles established by the shareholders of SPIC-Zuma Energía.

COMMITTEES	OBJECTIVES
Compliance	Ensure that the organization complies with applicable local laws, regulations, standards, and internal policies. Also manages risks and promotes a culture of compliance within the company.
Risks	Identify, measure, and manage risks that may affect business continuity and organizational resilience. Issues addressed include: • Matters of economic significance • Illegal and/or disciplinary matters • Irregularities in the process of signing and entering into contracts • Arbitration and litigation • Investments in high-risk businesses
Evaluation, compensation, and nomination	Enhance the company's governance structure by refining policies related to personnel compensation, evaluation, and promotion, ensuring transparent and objective processes.
Virtual Procurement Leadership Committee	Review and ensure compliance with procurement procedures, as well as the objectivity of public bidding processes, or those carried out by invitation, for the company.
Evaluation (suppliers)	Prepare and present the annual supplier evaluation program, and conduct evaluations by established criteria.

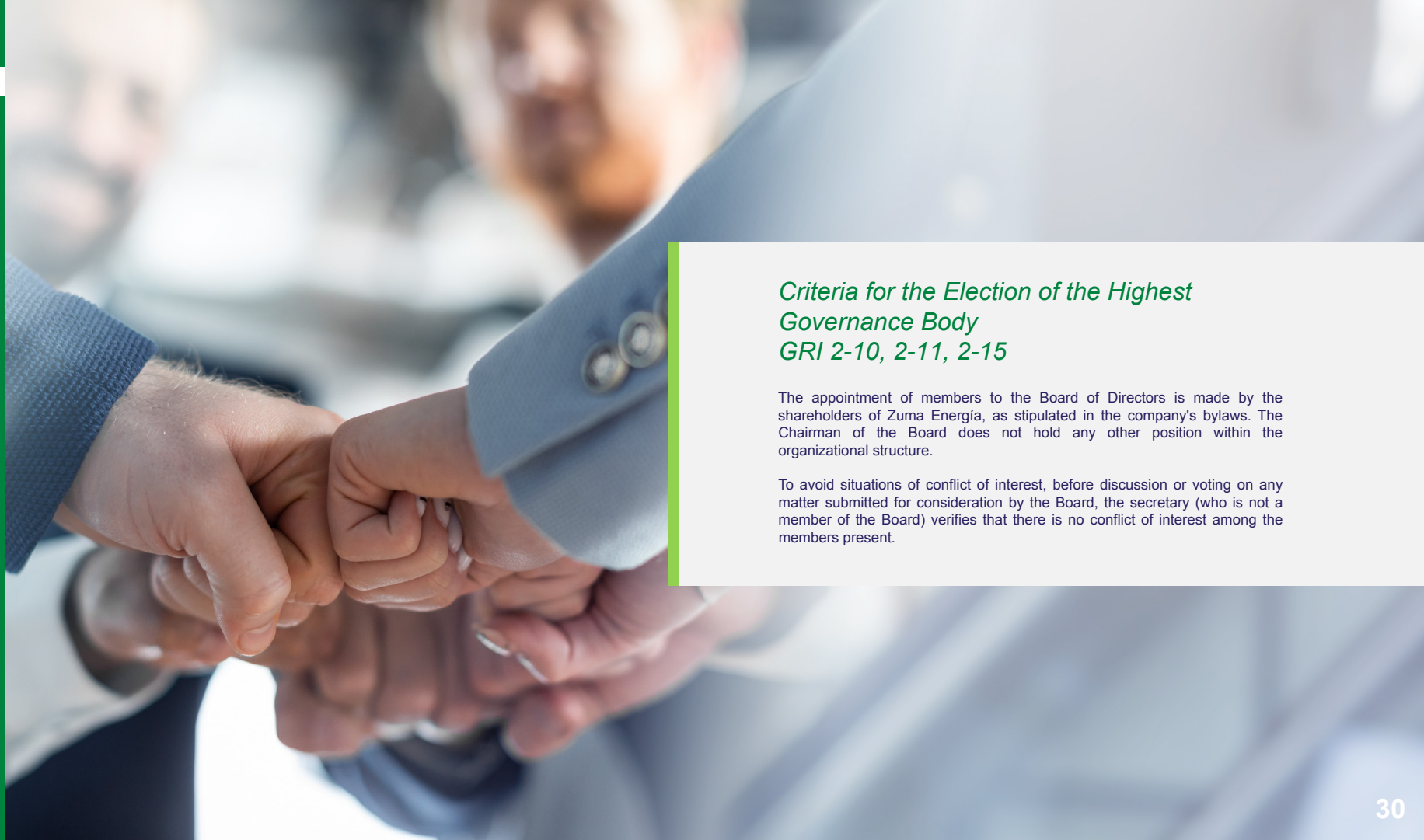
Table 1: List of committees and their objectives
Source: SPIC - Zuma Energia

About the Board of Directors
GRI 2-9

The Board of Directors of SPIC-Zuma Energía is composed primarily of individuals with one year or less of tenure, following changes made to its composition in 2024. The Board includes professionals with sector experience appointed by Zuma Energía's shareholders, many of whom also hold key positions either as executives or board members within SPIC subsidiaries at the international level.

FIRST AND LAST NAME	POSITION	YEARS OF SERVICE
Rufeng Shou	Member	Less than 1
Tong Xie	Member	1
Hongbo Yan	Member	3
Shuiping Tu	Member	1
Yimin Zou	Member	Less than 1

Table 2: Composition of the Board of Directors by position and length of service
Source: SPIC - Zuma Energía.



Criteria for the Election of the Highest Governance Body
GRI 2-10, 2-11, 2-15

The appointment of members to the Board of Directors is made by the shareholders of Zuma Energía, as stipulated in the company's bylaws. The Chairman of the Board does not hold any other position within the organizational structure.

To avoid situations of conflict of interest, before discussion or voting on any matter submitted for consideration by the Board, the secretary (who is not a member of the Board) verifies that there is no conflict of interest among the members present.

Knowledge of the Highest Governance Body
GRI 2-12, 2-13, 2-16

The members of the **Board of Directors** of SPIC-Zuma Energía attend annual meetings and training programs on environmental issues, human rights, conflicts of interest, competition, and corruption, among others. These activities are part of the **continuous improvement** mechanisms established by the company's shareholders.

The Board Office, whose function is to facilitate the operation and administration of the Board members, also provides the necessary information to support decision-making.

The Board meets periodically throughout the year. At these meetings, the General Management presents the **most relevant** issues related to operations, finances, legal matters, labor situations, and the company's social programs. When an issue requires a more in-depth analysis, due to its risk, impact, relevance, or novelty, workshops are organized among the members of the Board, General Management, and specialized personnel. In these spaces, doubts raised by the Board are resolved, and the necessary actions to implement the recommendations are defined.

Another function of the Board of Directors is to review and approve specific **fundamental policies** for the company. This allows it to remain involved in their design and implementation, and to contribute its knowledge and experience in key processes. The Board also meets regularly with the General Management to discuss and update these policies.

Finally, the members of the Board of Directors are evaluated annually by procedures and criteria established by the shareholders to monitor the proper **performance** of their duties.

In addition, SPIC-Zuma Energía has a **Compliance Committee**, whose objective is to ensure that the organization complies with applicable **regulatory standards and internal policies**. This committee comprises individuals with expertise in environmental, social, and governance (ESG) issues.

SPIC-Zuma Energía Policies

GRI 2-23, 2-24

Robust corporate governance alone does not guarantee that our operations comply with the guidelines established by the Board of Directors and shareholders. Therefore, SPIC-Zuma Energía has developed **policies and procedures** that ensure the application of its conduct expectations at all operational levels.

Policies that Ensure Responsible Business Conduct
GRI 2-24, 205-2

The **Compliance area** is responsible for **validating internal policies**, once the Quality area has reviewed them. Among the core policies is the **Anti-Corruption and Anti-Bribery** Policy, along with its corresponding procedures. This policy is communicated and disseminated to all SPIC-Zuma Energía personnel, establishing clear guidelines to prevent acts of corruption and conflicts of interest, both on the part of personnel and the organization's subsidiaries, partners, shareholders, clients, consultants, agents, proxies, representatives, and contractors.

The company requires that all organizations with which it maintains business relationships—suppliers, partners, or third parties—comply with the minimum standards established in this policy.

GRI 2-27

In addition, **the areas have developed specific policies**, reviewed by Quality and validated by Compliance, which ensure responsible business conduct:

FINANCE

- Tax Policy
- Management System for Funded Enterprises Policy
- Energy Trading Policy

These policies ensure regulatory compliance and promote transparency to shareholders.

LEGAL AND BOARD OFFICE

- Legal Risk Management Policy
- Litigation Dispute Management Policy
- Board Office Policy
- Rules for the Board of Directors Policy

These policies help prevent and manage legal risks while also establishing governance guidelines for the Board.

HEALTH, SAFETY, ENVIRONMENT AND QUALITY (HSEQ)

- Health and Safety Policy
- Health, Safety, Environment, and Quality Policy
- Risk Identification and Management Policy

These policies help protect human resources as well as overall assets, while mitigating social, labor, and safety risks.

The Compliance Committee is the body responsible for ensuring compliance with the applicable internal policies. It is comprised of the General Management, the Vice Presidents, the Legal Department, the HSEQ Department, the Human Resources Department, and the Compliance Manager. Its role is key in risk management and promoting a culture of organizational compliance.

The measures to ensure compliance with key policies are:

01

Initial Training
During the onboarding process, all new hires receive training on the Anti-Corruption Policy, which is provided and signed. The policy is posted on the corporate intranet, and in the event of changes, the entire organization is notified via email.

02

Annual training
All personnel receive annual training on the Anti-Corruption Policy and sign the "Certification and Employee Consent on Compliance Program".

03

Reporting channel
Personnel must report any suspected violation of anti-corruption laws or regulations to Compliance or General Management.

04

Trained Third Parties
Compliance may require intermediaries or business partners to receive anti-corruption training as a condition for continuing the relationship with the company.

05

Attention to officials
The Anti-Corruption Policy establishes strict guidelines for providing hospitality to government officials, their family members, or any third party, as well as for giving and receiving gifts, and for lodging and travel arrangements for these individuals.

06

Selection of intermediaries
The Compliance area must approve the selection of third parties that interact with government authorities on behalf of the company. Any engagement with these third parties must be formalized in a written contract, with a clause expressly prohibiting improper payments.

GRI 2-15

07

Contracts with business partners
Before entering into contracts, the rules established for due diligence of third-party intermediaries should be applied.

08

Off-site contributions and improvements
The policy permits these actions only under a defined procedure, and only when they support vulnerable groups, benefit communities, and align with the social investment strategy. Off-site cash donations to government entities or individuals are strictly prohibited.

09

Identification of ties to officials
Human Resources must identify candidates or personnel who are, have been, elated to public officials, political figures, or persons in positions of influence in connection with the company's business.

10

Conflicts of Interest
Personnel must inform Human Resources of any potential or actual conflicts of interest.

11

Accounting records
All financial documents must be maintained and recorded accurately by local laws and International Financial Reporting Standards (IFRS).

12

Forensic audits
Periodic audits are conducted by legal firms or external auditors, as determined by the Compliance area.

13

Ethics and Compliance Reporting Channel
An independently managed ethics reporting channel allows employees, suppliers, and third parties to submit anonymous concerns related to integrity, ethics, or compliance.

Corruption Risk Assessments
GRI 205-1

By its Anti-Corruption Policy, the company conducts due diligence processes to collect and analyze necessary information, assessing associated risks and making informed decisions about specific transactions, projects, activities, business partners, or individuals.

In the case of relationships with business partners, the company applies **internal controls** to identify and verify individuals and companies with which it intends to establish links, whether as partners, employees, service providers, suppliers, contractors, or other relevant parties.

The Anti-Corruption and Anti-Bribery Procedure establishes the mandatory process for hiring any third-party intermediary that interacts on behalf of the company with government entities or officials, as well as business partners with whom a contract must be formalized. In these cases, the Compliance area must either perform or commission an external provider to conduct due diligence.

The company reserves the right **to refrain from entering into commercial agreements** with any third party that, as a result of due diligence, does not demonstrate that it operates under ethical standards, or that refuses to participate in the process or to provide the requested information.

Taxation
GRI 207-1, 207-2, 207-3

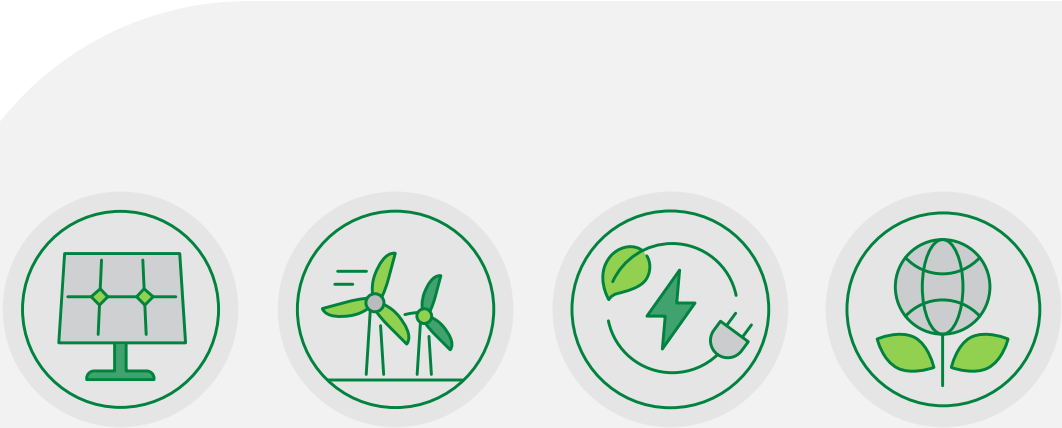
SPIC-Zuma Energía is committed to full **compliance with its** tax **obligations**. As a responsible corporate entity, it complies with all applicable tax laws and regulations in Mexico. This commitment is part of its adherence to ethical practices and sound corporate governance.

Opportunities, Customers, and Business Relationships

Climate Change Risks and Opportunities
GRI 201-2

Thanks to its abundant natural resources, Mexico has significant potential for renewable energy development, offering numerous investment opportunities, particularly as regards solar and wind projects. Additionally, the country has established **energy transition targets**, including generating 35% of its electricity from clean sources by 2040.

For SPIC-Zuma Energía, the Mexican context not only favors its growth as a company but also contributes to national economic development, job creation, and the attraction of foreign investment. Increasing the share of renewable energy in the country's energy matrix can strengthen its energy security and reduce dependence on fossil fuels.



In addition, the transition to clean sources can significantly reduce greenhouse gas emissions and help fulfill **global climate commitments.**

SPIC-Zuma Energía is fully committed to the national energy transition objectives and actively seeks to participate in the national electricity market, as well as to develop new partnerships with governmental entities.

Customers and Markets
IF-EU-000-A, IF-EU-000-B, IF-EU-000-D
GRI 2-6, 302-2

In Mexico, the Energy Transition Law establishes a minimum target of 35% clean energy participation in electricity generation by 2040. Additionally, since 2022, the Ministry of Energy (SENER) and the National Energy Commission (CNE) have mandated the use of Clean Energy Certificates (CELs), requiring obligated entities to acquire at least 13.9% of their energy consumption in CELs, in order to support the achievement of national energy transition goals.

SPIC-Zuma Energía serves in Mexico more than seven suppliers, marketers, and other figures established in the legislation, distributed as follows:

WHOLESALE CUSTOMERS: **MORE THAN 95%.**	COMMERCIAL CUSTOMERS: **LESS THAN 5%.**

According to the latest data(1) on the Renewable Porfolio Standard (RPS), clean energy accounted for 23.19% of the country's total power generation in 2023.

3. *Programa de Desarrollo del Sistema Eléctrico Nacional (PRODESEN) 2024-2038 published by the Ministry of Energy.*

SPIC-Zuma Energía markets electricity and related products primarily to public and private suppliers throughout the country, as well as to other market participants. Except for one project operating under the Public Service Law of Electric Energy (LSPEE), all energy generated is marketed under the schemes established in the Electricity Industry Law (LIE).

All of the electricity generated by SPIC-Zuma Energía comes from clean sources: 48% from wind and 52% from solar. In 2024, the total energy sold was 3,209,348 MWh (equivalent to 11,553,652.8 GJ).

48%
WIND ENERGY

52%
SOLAR ENERGY

Tariffs
IF-EU-240a.1

The total energy generated by SPIC-Zuma Energía is sold under free market and competitive conditions, either through bilateral contracts negotiated between generators and suppliers, or through direct sales in the Wholesale Electricity Market. None of its projects receive government incentives or are subject to preferential tariffs, such as feed-in tariffs.

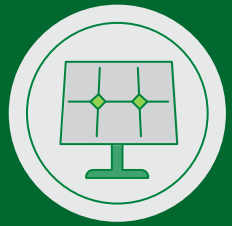
SPIC-Zuma Energía does not sell energy directly to final consumers, but exclusively to suppliers, except for one project that operates under the LSPEE regime.

Generation And Transmission Lines IF-EU-000-C

SPIC-Zuma Energía has an **installed capacity of 1.3 GW** spread across five Mexican states, through the following operating assets:

SIX SOLAR FARMS (856 MW)
Orejana Solar Farm
Potrero Solar Farm
Santa María Solar Farm
Las Ahumadas *(Jaguar Solar Project)*
Rancho el Trece *(Jaguar Solar Project)*
Torreoncitos *(Jaguar Solar Project)*

TWO WIND FARMS (474 MW)
Reynosa wind farm
Ingenio Wind Farm



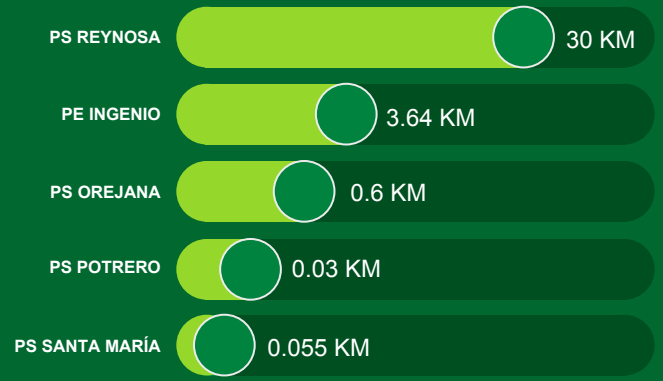


Table 3: Length in km of transmission lines by operation site
Source: SPIC - Zuma Energía

Environmental Management

One of the most noteworthy aspects of SPIC-Zuma Energía's operations in Mexico is its low resource consumption and the reduced environmental impact of its operations. The following is a description of energy consumption and intensity, greenhouse gas emissions, materials used, waste management practices, water usage, and biodiversity conservation actions.

Energy and Emissions
GRI 302-1, 305-1, 305-2

Energy consumption at SPIC-Zuma Energía's various sites is low compared to other industries. In 2024, total consumption was 16,437.14 MWh. As shown below, this energy originates from the electricity grid, making it a non-renewable source of energy.

ENERGY CONSUMPTION		
Site	**MWh**	**Source**
Corporativo	63.44	Non-renewable
PE Reynosa	2,390.1	Non-renewable
PE Ingenio	399.0	Non-renewable
PS Orejana	3,560.6	Non-renewable
PS Potrero	4,692.2	Non-renewable
PS Santa María	3,268.5	Non-renewable
Jaguar Project	2,063.3	Non-renewable

Table 4 Energy consumption in MWh
Source: SPIC - Zuma Energía

The energy intensity recorded by SPIC-Zuma Energía was 0.005, calculated as the quotient between absolute energy consumption and the organization's total energy production.

To further reduce energy consumption from fossil sources, LED lamps were installed in the company's operational parks in 2024.

In addition, direct **greenhouse gas (GHG) Scope 1** emissions **were low, as** shown in the table below:

Site	Tons of CO_2 equivalent
PE Ingenio	31.15
PE Reynosa	69.93*
PS Potrero	48.34
PS Santa María	36.07*
PS Orejana	69.92
Jaguar Project	55.98

Table 5: Scope 1 direct GHG emissions, in metric tons of CO2 by operating site
Source: SPIC - Zuma Energía
Notes: Information is based on 2024 gasoline consumption for own vehicles.[2]
**Also includes diesel consumption for emergency power generator (2024).*

Finally, **Scope 2 GHG emissions were also low.** These were calculated based on annual electricity consumption (in MWh) during 2024.

Site	Tons of CO_2 equivalent
PE Ingenio	174.76
PE Reynosa	1,046.82
PS Potrero	2,055.10
PS Santa María	1,431.38
PS Orejana	1,559.72
Jaguar Project	695.57

Table 6: Scope 2 GHG emissions, in metric tons of CO2 by operating site
Source: SPIC - Zuma Energía

Materials and Waste
GRI 301-1, 306-1, 306-2, 306-3, 306-4, 306-5

The materials used at the different operating sites that may have an impact on the environment or human health are as follows:

Material	Weight or volume in liters	Type of resource
Multiplier oil	20,000	Non-renewable
Hydraulic oil	8,000	Non-renewable
Degreasers	5,000	Non-renewable

Table 7: Materials used by weight or volume and type
Source: SPIC - Zuma Energía

All the wind farms have a **temporary storage facility for hazardous waste**. Upon entering the warehouse, the hazardous materials are recorded in a logbook in compliance with applicable environmental regulations.They are then delivered to duly authorized companies for transportation and final disposal, which directs them to collection centers for treatment, either as an alternative fuel, for recycling, or, in exceptional cases, for confinement.

Municipal solid waste (MSW) is temporarily stored and then transported – either by the company or third-party providers – to transfer centers, recovery facilities, or municipal landfills when reuse is not feasible.

The following is a summary of **waste generated** by the operating site, type, destination, and quantity in tons.

INGENIO
WIND FARM

PE INGENIO			
SITE	**TYPE**	**WASTE**	**TONS**
Hazardous waste (HW)	Oil and grease-impregnated solids	Alternate fuel formulation	3.0445
	Oil-impregnated filters	Alternate fuel formulation	1.68175
	Contaminated soil	Co-processing	0.191
	Brushes	Recycling	0.004
	Fluorescent lamps	Confinement	0.017
	Lubricating oil	Alternate fuel formulation	4.0921
Municipal solid waste (MSW)	Cardboard and paper	Municipal landfill	0.0465
	PET	Municipal landfill	0.0273
	Glass	Municipal landfill	0.0275
	Wood	Municipal landfill	0.0100
	Metals/aluminum	Municipal landfill	0.005
	Organic waste	Municipal landfill	0.0255
	Inorganic (operation/maintenance)	Municipal landfill	0.040

Table 8. Tons of waste generated at Ingenio, by type and destination.
Source: SPIC-Zuma Energía

REYNOSA
WIND FARM

PE REYNOSA			
SITE	**TYPE**	**WASTE**	**TONS**
Hazardous waste (HW)	Fiberglass	Recycling	4.100
	Spent lubricating oil	Formulation of alternative fuel	0.960
	Oil and grease-impregnated solids	Alternate fuel formulation	7.600
	Oil-contaminated plastics	Alternate fuel formulation	1.580
	Lithium batteries	Recycling	0.001
	Water contaminated with oil	Formulation of alternative fuel	0.350
	Soil contaminated with oil	Co-processing	0.150
Municipal solid waste (MSW)	Cardboard	Recycling	0.96
	PET	Municipal landfill	0.2
	Organic waste	Municipal landfill	0.5
	Non-recyclable waste	Municipal landfill	18.3

Table 9. Tons of waste generated at Reynosa, by type and destination.
Source: SPIC-Zuma Energía

POTRERO/ OREJANA
SOLAR FARMS

POTRERO

SITE	TYPE	WASTE	TONS
Hazardous waste (HW)	Contaminated solids	Formulation of alternative fuel	0.095
	Contaminated soil	Co-processing	0.030
Municipal solid waste (MSW)	Cardboard	Municipal landfill	0.212
	Wood	Municipal landfill	0.063
	Inorganic waste	Municipal landfill	6.227
	Utility paper	Municipal landfill	3.755

OREJANA

SITE	TYPE	WASTE	TONS
Hazardous waste (HW)	Spent hydraulic oil	Formulation of alternative fuel	1.51
	Solids impregnated with chemicals	Alternate fuel formulation	0.1403
Municipal solid waste (MSW)	PET	Recycling	0.015
	Cardboard	Recycling	0.279
	Aluminum	Recycling	0.006
	Paper	Recycling	0.007
	Inorganics	Municipal landfill	0.68

Table 10. Tons of waste generated at Potrero and Orejana, by type and destination.
Source: SPIC-Zuma Energía

SANTA MARÍA
SOLAR FARM

SANTA MARÍA			
SITE	**TYPE**	**WASTE**	**TONS**
Hazardous waste (HW)	Maintenance solids	Formulation of alternative fuel	0.4123
	Aerosol cans	Recycling	0.0426
	Contaminated sand	Co-processing	0.1486
	Spent oils	Alternate fuel formulation	0.0317
	Spent fuels	Alternate fuel formulation	0.012
Municipal solid waste (MSW)	Non-recyclable waste	Municipal landfill	1.215
	Cardboard	Recycling	0.285
	PET	Recycling	0.32
	Plastic caps	Recycling	0.02
	Organic waste	Recycling	0.112

Table 11. Tons of waste generated at Santa María, by type and destination.
Source: SPIC-Zuma Energía

JAGUAR PROJECT
SOLAR FARM

JAGUAR PROJECT			
SITE	**TYPE**	**WASTE**	**TONS**
Hazardous waste (HW)	Solids impregnated with oil and grease	Formulation of alternative fuel	1.05
	Empty chemical containers	Controlled destruction	0.21
	Contaminated oils	Formulation of alternative fuel	0.4
Municipal solid waste (MSW)	Cardboard and paper	Municipal landfill	3.4
	PET	Landfill	0.45
	Metal	Recycling	0.65
	Wood	Landfill	0.5
	Organic waste	Compost	0.28

Table 12. Tons of waste generated at Jaguar, by type and destination.
Source: SPIC-Zuma Energía

Water
GRI 303-1, 303-2, 303-3, 303-4, 303-5
IF-EU-140a.1

SPIC-Zuma Energía's solar and wind farms receive drinking water from duly authorized suppliers. Wastewater is collected and treated by third-party providers at treatment plants located in the municipalities where the farms operate.

No impacts related to drinking water consumption or wastewater discharge were reported in 2024.

Monthly potable water consumption is **strictly controlled** because the storage capacity of each park limits the amount available. Similarly, wastewater storage capacity is also limited, so wastewater is collected monthly by an authorized external supplier.

Below is information on water management in terms of **extraction, consumption**, and **discharge**, by operating site:

WATER WITHDRAWAL

Site	Source	Quantity ($m^{3/year}$)	Water stress zone?
PE Ingenio	Third parties	120	Medium High
PE Reynosa	Third parties	360	High
PS Potrero	Third parties	120	High
PS Santa María	Third parties	180	High
PS Orejana	Third parties	62	Extremely
Project Jaguar	Third parties	255	High

Table 13: Measurement in m3 of water withdrawal by source and site of operation. Source: SPIC - Zuma Energía

WATER DISCHARGE

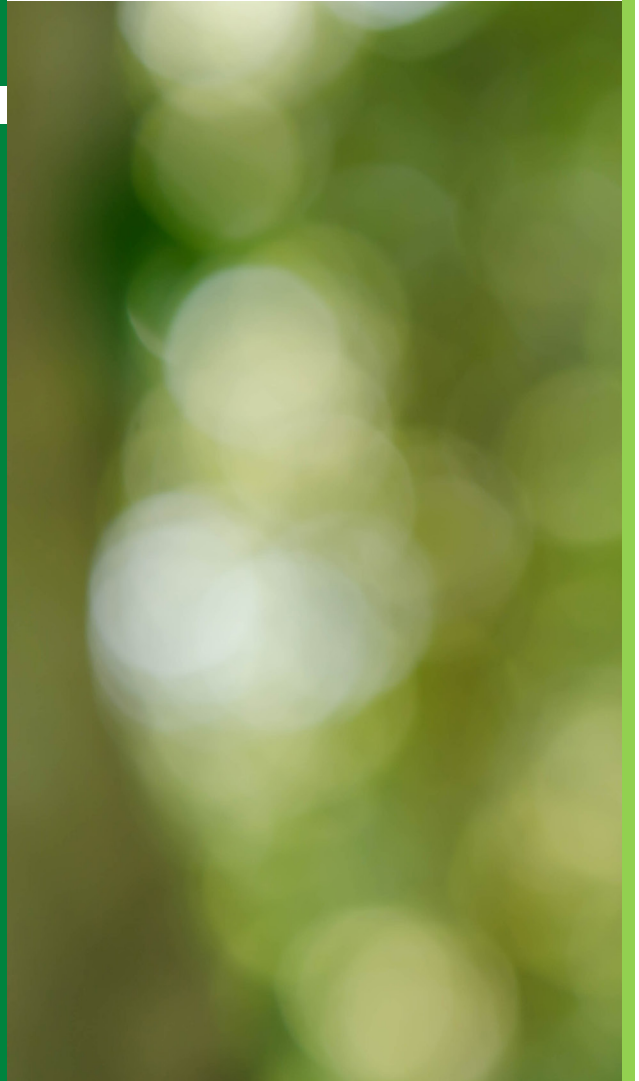
Site	Source	Quantity ($m^{3/year}$)	Water stress zone?
PE Ingenio	Third parties	84	Medium High
PE Reynosa	Third parties	20	High
PS Potrero	Third parties	60	High
PS Santa María	Third parties	17	High
PS Orejana	Third parties	35	Extremely
Project Jaguar	Third parties	120	High

Table 14: Measurement in m3 of water discharge by type of destination and operation site. Source: SPIC - Zuma Energía

WATER CONSUMPTION

Site	Consumption ($m^{3/year}$)
PE Ingenio	36
PE Reynosa	340
PS Potrero	60
PS Santa María	163
PS Orejana	27
Jaguar Project	131

Table 15: Measurement in m3 of total water consumption by operation site. Consumption corresponds to the difference between the volume of water withdrawn and the volume of water discharged. Source: SPIC - Zuma Energía



Biodiversity
GRI 304-4

The **species recorded at SPIC-Zuma Energía's operating sites** that appear on the International Union for Conservation of Nature (IUCN) Red List and/or in the Mexican Official Standard NOM-059-SEMARNAT-2010 are listed below:

Site	Conservation status (IUCN/NOM-059)	Species (common name)
PS Potrero	Endangered (EN)	Smilisca dentata (Burrowing frog)
PS Santa María	Near Threatened (NT)	Charadrius vociferus (plover) Lanius ludovicianus (hangman's frog) Terrapene ornata (box turtle)
PS Orejana	Near Threatened (NT)	Lanius ludovicianus (American hangman) Olneya tesota (palo fierro)
PE Reynosa	Least Concern (LC)	Plexippus danaus (monarch butterfly, migratory species)
Project Jaguar	Threatened (A)	Uta stansburiana (spotted side lizard)
	Special protection (Pr)	Parabuteo unicinctus (Harris's hawk) Crotalus atrox (Diamond-backed rattlesnake)

Table 16: Species listed in NOM-059-SEMARNAT-2010 and/or the IUCN Red List, by operation site and status.
Source: SPIC - Zuma Energía

Clean Energy and People

People Employed

GRI 2-7, 405-1

At the end of 2024, 132 people made the operation and production of SPIC-Zuma Energía's clean energy in Mexico possible. The following table shows the distribution of personnel by operating site, number, and gender:

Type/Site	PE Reynosa	PE Ingenio	PS Potrero	PS Santa María	PS Orejana	Jaguar Project	Corporate
Male employees	5	5	13	11	7	1	53
Female employees	1	1	5	_	3	_	23

Table 17: Total number of people employed, broken down by gender and site of operation.
Source: SPIC - Zuma Energía

Complaints, Claims, and Concerns Channel GRI 2-26

In SPIC-Zuma Energía, there is a mechanism for employees to communicate their concerns, report violations of the code of ethics and internal policies, as well as situations related to harassment, theft, workplace violence, or any event that affects their **human or labor rights**.

These situations can be reported directly to the Human Resources Department or through the **anonymous reporting channel**.

In cases of doubt related to leadership or the work environment, Policy NOM-035 establishes that individuals can consult with Human Resources to discuss issues such as stress, workload management, and leadership-related aspects.

The **NOM-035 study** was conducted in 2023, and the results were received in 2024, from which action plans were defined.

In 2025, we plan to conduct a **workplace climate survey to gather insights into** the concerns and experiences of employees within the organization.

Health and Safety

Management System

GRI 401-1, 403-8

In 2024, SPIC-Zuma Energía's occupational health and safety system covered all of the company's direct employees and contractors not covered by independent safety systems. During that year, 102 contractors participated, some of whom were covered by their own companies and others by SPIC-Zuma Energía's system.

In compliance with legal requirements regarding health and safety, a procedure is in place for identifying and adapting to the specific legal requirements of each wind farm, taking into account its unique reality and conditions. Each business unit maintains its matrix for determining requirements. Contractors are obliged to comply with the same legal framework as the company. To ensure compliance, an annual occupational health and safety audit is conducted.

In 2024, the process of adapting and implementing a safety system oriented explicitly to the operation and maintenance stages of solar and wind farms began, as previously the focus had been on the construction phase. By 2026, all processes are expected to be aligned with ISO 45001 guidelines.

Processes to Identify and Evaluate Risks and Incidents
GRI 403-2

SPIC-Zuma Energía has several tools for identifying occupational hazards and risk assessment, applicable to both its personnel and contractors.

These tools include:

- **Health and Safety Committee:** made up of workers and park managers, established in accordance with the provisions of NOM-019-STPS-2011 of the Ministry of Labor and Social Welfare (Secretaría del Trabajo y Previsión Social, STPS).

- **Observation cards:** designed to identify unsafe acts and conditions at key positions. The names of the persons observed are not mentioned, which facilitates communication and allows for immediate closure of the observation session when possible.

- **Safety walkthroughs:** conducted twice a month by park management to identify deviations in the health and safety system.

- **Risk matrix:** documents, classifies, and prioritizes risks according to the internal identification and evaluation procedure. This matrix is updated when an accident occurs, if changes are made to the processes, or at least once a year in the absence of such events.

Each task is evaluated using the risk matrix, and the corresponding control measures are implemented accordingly. If the required controls are not in place, the worker has the right to refuse to perform the task or to report the situation to the HSEQ supervisor at the site, who is authorized to stop the activity until all necessary conditions are met

If the worker does not receive support from their direct supervisor, they may **report hazardous conditions** through the following channels:

- **Safety and Hygiene Commission**
- **Observation cards (with anonymous registration)**
- **Anonymous reporting channel, described in the previous section**

In addition, SPIC-Zuma Energía has a formal procedure for **investigating labor incidents**, which includes hazard identification, risk assessment, definition of corrective actions, and application of the hierarchy of controls. This procedure is based on root cause analysis, jointly developed by the Quality and Operations areas.

Hazards and Risks Identified

Hazards with the potential to cause serious consequences have been identified in the workplace, including:

- **Hazardous energies**
- **Earthquakes**
- **Falls from different levels**
- **Vehicular accidents within the wind farms**

These hazards were determined through risk analyses performed at each of the operating wind farms. To date, none of these high-severity risks have materialized. The incidents recorded have occurred in peripheral tasks, associated with significantly lower risks.

Measures implemented to eliminate or mitigate hazards with serious consequences include:

- **Systematic identification and assessment of risks.**
- **Inclusion of identified risks in the risk matrices of each wind farm.**
- **Assignment of specific mitigation and control measures.**
- **Development of operating procedures and technical manuals**
- **Training of personnel in the identified risks**
- **Integration of emergency brigades**
- **Preparation and dissemination of risk maps**
- **Implementation of operational controls**
- **Carrying out periodic internal drills.**

These actions are part of our occupational health and safety management system, designed to prevent incidents and provide comprehensive protection for all individuals operating at SPIC-Zuma Energía sites.

Occupational Health and Safety Training GRI 403-5

Most health and safety efforts at SPIC-Zuma Energía are focused on its operating sites. In 2024, a series of training sessions were conducted to strengthen risk prevention and ensure regulatory compliance. The sessions covered the following topics:

- Electrical risk
- Defensive driving
- Road safety
- Health and Safety Commissions
- Root-cause analysis
- GWO (Global Wind Organization) certification: includes first aid, work at heights, and emergency brigades.
- Emergency brigades
- Preventive work on trackers
- Handling of electrical cells
- Use, care, and maintenance of Personal Protective Equipment (PPE)
- Wildlife management and containment
- Emergency response plan
- Training of trainers
- HSEQ policy
- Vehicle use policy
- Lockout and tagout procedure (hazardous energies)
- Internal civil protection program
- Use of GOIAN elevators (in a wind farm)
- Ergonomics
- Lighting
- Training and qualification committee
- Thermographies
- Safestart: human factors
- Integrated management system SPIC-Zuma Energy
- Globally Harmonized System (GHS)
- Handling, transport, and storage of chemicals and hazardous substances
- Fire prevention and firefighting

Management Data
GRI 403-9
IF-EU-320a-1

In 2024, SPIC-Zuma Energía achieved a significant health and safety milestone: no fatalities or injuries were reported among its direct personnel. According to plant records, the total number of hours worked was 265,767.

Special attention was paid to the care of personnel with greater exposure to risks, such as solar and wind farm technicians and warehouse workers, who are particularly exposed to ergonomic risks. At the end of the year, no cases of occupational illnesses, musculoskeletal ailments, or recordable diseases were reported, either among personnel or suppliers.

In the case of suppliers, no deaths or injuries with serious consequences were reported. However, four recordable occupational injuries were reported at the Reynosa Wind Farm, resulting in a recordable injury rate of 1.55 per 100,000 hours worked.

Occupational Health Services and Worker Participation
GRI 403-3, 403-4

SPIC-Zuma does not maintain its own clinic or offer medical care. However, it provides its workers with access to health services through the following mechanisms:

- **Insurance for major medical expenses** is available for all direct employees of SPIC-Zuma Energía and its subsidiaries.

- **Annual medical check-ups** are offered to all company personnel.

Health promotion is reinforced through annual health campaigns organized in parks, in collaboration with institutions such as the Mexican Social Security Institute (IMSS) and local health centers.

Additionally, daily 5-minute talks on health and safety are conducted at the operating sites, covering topics related to both physical and mental wellbeing.

These activities strengthen the culture of prevention and encourage personnel to participate in identifying risks and taking care of their health.

Health and Safety Achievements
GRI 403-6

As part of its **preventive and proactive approach to health and safety**, SPIC-Zuma achieved significant progress and milestones in 2024, including the following highlights:

Zero accidents or injuries in parks or offices among SPIC-Zuma Energía personnel.	**First corporate training week** for HSEQ coordinators, held at the corporate offices.	Monthly vehicle inspections and implementation of **weekly alcohol tests** for drivers	**Beginning of the installation of GPS, roll bars, and structural improvements** in company vehicles.	 HSEQ culture internalization campaign implemented at the organizational level.	**Defensive driving courses are** given in all parks for driving personnel.
Initiation of a training program in parks provided by certified third parties, the first of its kind in the company's history.	**Acquisition and improvement of emergency firefighting equipment** in all operating parks. 	Achievement of the training objective, reaching an investment of **0.3% of hours worked in health and safety training.**	 **Implementation of new** occupational health and safety procedures.	**Absence of sanctions or warnings by competent health and safety authorities during 2024.**	

Suppliers

Suppliers and Local Communities

GRI 414-1, 414-2

In October 2024, SPIC-Zuma Energía approved its new **Procurement Policy**, representing a **significant improvement in the management of its supply chain**. This update strengthened the relationship with suppliers in two key aspects:

• **A priority supplier evaluation process** was established, which allows the company to make strategic decisions based on performance, while contributing to the operational and administrative strengthening of these suppliers.

• The possibility of **contracting local suppliers** for services in the parks was expanded, which resulted in two tenders awarded at the Orejana Solar Park for pruning and module cleaning services, allocated to local suppliers. By 2025, this scheme is expected to be replicated at the Potrero Solar Park.

Prior to this update, SPIC-Zuma Energía already had worked with suppliers, in compliance with agreements established with neighboring communities during the construction and operation stages of its solar and wind farms. These agreements are part of the company's commitment to the socioeconomic development of its environment.

Aware that some local direct assignment suppliers may have limited knowledge of labor and tax requirements, the **Procurement area closely monitors** suppliers and their personnel to ensure compliance with attendance requirements at work.

- Comply with their attendance obligations at work.
- Are registered with the Mexican Social Security Institute (IMSS).
- Have a positive compliance opinion from the Tax Administration Service (SAT).

This approach aims to mitigate the risk of non-compliance in terms of human rights, labor, and tax obligations, particularly among suppliers with limited business experience and expertise.

Supplier Selection Filters
GRI 308-1, 408-1, 409-1

At SPIC-Zuma Energía, all suppliers registered in the system must undergo corporate and tax compliance checks. In 2024, a total of **232 suppliers** were **registered and validated.**

In addition, when entering wind farms or operating sites, they must comply with a series of operational and safety requirements, among them:

- Participate in mandatory health and safety training provided by the HSEQ area.
- Present a valid driver's license and vehicle policy.
- Wear personal protective equipment (PPE).

To ensure **compliance with national legislation** and **human and labor rights** commitments, SPIC-Zuma Energía has implemented the following additional filters:

- Contracted companies must have current registration with REPSE (*Registro de Prestadores de Servicios Especializados u Obras Especializadas*).
- They must submit a list of the personnel who will enter the operation sites.
- Their personnel must be registered with the Mexican Social Security Institute (IMSS) or must have primary medical insurance.

Alliances, Communities, and Actions

Strategic Alliances

GRI 413-1

SPIC-Zuma Energía maintains a proactive approach to building strong relationships with local governments in the areas where it operates. As part of this commitment, **projects aligned with municipal and state priorities and development plans** have been established, including:

- **Chihuahua:** collaboration agreement to execute an annual social infrastructure work, aligned with the municipality's Social Development Plan.
- **Oaxaca:** commitment to carry out an annual social work, aligned with the Municipal Development Plan.
- **Jalisco:** agreement to reforest 700 hectares during the life of the project.
- **Tamaulipas:** Collaboration with the state government on investment projects with social development impact.

These strategic alliances not only contribute to the development and wellbeing of the communities in which we operate but also generate synergies that strengthen and enhance **the impact of government programs and projects**.

Social Investment Strategy

The social initiatives developed by SPIC-Zuma Energía are part of its **Social Investment Strategy** and represent **long-term commitments** undertaken from the construction phase of the projects. This strategy responds to the requirements of the Mexican Federal Government, as well as credit contracts and agreements signed with municipal authorities.

One of the main advances in 2024 was the updating of **Social Baselines** (LBS) and **Social Impact Assessments** (EvIS), with the aim of redesigning processes and strengthening the Social Investment Strategy:

- **3 Social Baselines updated**
- **7 Social Impact Assessments carried out**

These actions comply with the provisions of the Electricity Industry Law (Chapter II, Articles 117 and 120), which establish the obligation to conduct Social Impact Assessments to identify, characterize, foresee, and evaluate the positive and negative social impacts derived from projects, by the principles of sustainability and human rights.

The strategy is structured in three main lines of action:

CAPACITY BUILDING

Includes training and programs in health and education, with clear information on the benefits and risks of energy projects.

BASIC INFRASTRUCTURE

Includes investments in schools, health centers, and public spaces, in response to needs identified in the communities.

COMMUNITY DEVELOPMENT

Promotes local employment, strengthens regional suppliers, and offers entrepreneurship workshops, with a focus on community empowerment and economic wellbeing.

At SPIC-Zuma Energía, building strong relationships with local communities is a core value. Our operations are guided by respect and cooperation with the social environment. In 2024, we held 44 informational and follow-up meetings with community members and local authorities.

As part of our commitment to collaboration, we signed a partnership agreement with the *Instituto de Capacitación para el Trabajo del Estado de Chihuahua* to offer job training and education programs focused on renewable energy.

We also carried out eight community development initiatives and held twelve volunteer days. During these events, more than 100 school supply kits and laptops were distributed, along with over 200 toys for children in vulnerable situations.

In addition, we hosted five entrepreneurship workshops, 37 educational sessions, and 31 health-related workshops, reaching more than 2,000 people.

Our community clinic continues to operate year-round, providing medical care, follow-up, and health education to over 150 families. Through this clinic, more than 4,000 medicines were distributed in 2024—entirely free of charge to beneficiaries.

ACTIVITIES

8 COMMUNITY DEVELOPMENT
12 VOLUNTEER

100 SCHOOL SUPPLIES AND LAPTOPS
200 TOYS
5 ENTREPRENEURSHIP WORKSHOPS
37 TDUCATIONAL WORKSHOPS
31 THEALTH WORKSHOPS

+2,000

BENEFITING

MEDICAL ATTENTION
+150 FAMILIES
+4,000 MEDICINES

3 INFRASTRUCTURE PROJECTS

We supported the rehabilitation of three public and educational spaces through the development of three infrastructure projects:

PUBLIC GYM AND PLAYGROUND

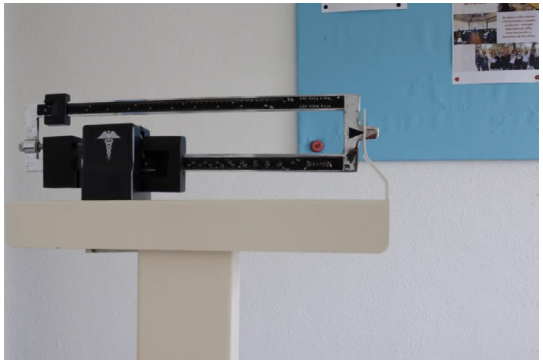
A SCHOOL SPORTS ROOF

STUDENT DINING HALL

Additionally, the foundations were laid for a fourth project, which is expected to be completed in 2025.

Social investments are monitored through compliance reports and photographic evidence. Additionally, contingency plans are prepared to address potential impacts on landowners resulting from the operation of the wind farms, and consultants specializing in regulatory and agrarian issues are utilized.

The company maintains direct **communication channels** and **anonymous reporting** mechanisms, as well as a **direct line** to the community liaison and social affairs teams, which are available to address queries, reports, and comments from communities and other stakeholders.[4]



4. Link to SPIC-Zuma Energía's reporting website: https://etica.resguarda.com/zumaenergia/mx_es.html

GRI and SASB Index

The information presented in this index is accurate and reflects the content published in SPIC-Zuma Energía's second Sustainability Report, which covers the period from January 1 to December 31, 2024.
This index is aligned with the sustainability information presented in the three key axes of the ESG strategy (Environment, Social, and Governance) by the Global Reporting Initiative (GRI) standards.
For more information on the GRI, please visit: ***www.globalreporting.org*** ***www.sasb.ifrs.org/standards/***

GRI INDEX

GRI 2: GENERAL DISCLOSURES 2021

Standard		Content	Page / direct response or reason for omission
GRI 2 General Disclosures 2021	2-1	Organization details	3,4,8,9
	2-2	Entities included in the organization's sustainability reports	5-6,9
	2-3	Reporting period	5-6
	2-6	Activities, value chain, and other business relationships	8, 41
	2-7	Employees	8, 58
	2-9	Governance structure and composition	27-29
	2-10	Nomination and selection of the highest governance body	30
	2-11	Chair of the highest governance body	30
	2-12	Role of the highest governance body in overseeing the management of impacts	31
	2-13	Delegation of responsibility for managing impacts	31
	2-14	Role of the highest governance body in sustainability reporting	5
	2-15	Conflicts of interest	30,36
	2-16	Communication of critical concerns	31
	2-17	Knowledge of the highest governance body	31
	2-18	Evaluation of the performance of the highest governance body	31
	2-22	Statement on sustainable development strategy	22-26
	2-23	Policy commitments	32-36
	2-24	Embedding policy commitments	33
	2-26	Mechanisms for seeking advice and raising concerns	59
	2-27	Compliance with laws and regulations	34
	2-29	Approach to stakeholder engagement	7

GRI INDEX

GRI 3 MATERIAL TOPICS 2021

Standard		Content	Page / direct response or reason for omission
GRI 3 Material topics 2021	3-1	Process to determine material topics	13-21
	3-2	List of material topics	13-21
	3-3	Management of material topics	13-21
GRI 200: ECONOMIC STANDARDS			
GRI 201 Economic Performance 2016	201-2	Financial implications and other risks and opportunities due to climate change	39-40
GRI 205 Anti-corruption 2016	205-1	Operations assessed for risks related to corruption	37
	205-2	Communication and training about anti-corruption policies and procedures	33
GRI 207 Tax	207-1	Tax approach	38
	207-2	Tax governance	38
	207-3	Stakeholder engagement and management of concerns related to tax	38

GRI INDEX

GRI 300: ENVIRONMENTAL STANDARD

Standard		Content	Page / direct response or reason for omission
GRI 301 Materials 2016	301-1	Materials used by weight or volume	48
GRI 302 Energy 2016	302-1	Energy consumption within the organization	46
	302-2	Energy consumption outside the organization	41-42
GRI 303 Water and Effluents 2018	303-1	Water as a shared resource	55-56
	303-2	Management of water discharge-related impacts	55-56
	303-3	Water withdrawal	55-56
	303-4	Water discharge	55-56
	303-5	Water consumption	55-56
GRI 304 Biodiversity 2016	304-4	Species on the IUCN Red List and national conservation lists affected by operations	57
GRI 305 Emissions 2016	305-1	Direct (Scope 1) GHG emissions	46-47
	305-2	Indirect (Scope 2) GHG emissions from energy generation	46-47
GRI 306 Waste 2020	306-1	Waste generation and significant impacts related to waste	48-54
	306-2	Management of significant impacts related to waste	48-54
	306-3	Waste generated	48-54
	306-4	Waste diverted from disposal	48-54
	306-5	Waste directed to disposal	48-54
GRI 308 Supplier Environmental Assessment 2016	308-1	New suppliers screened using environmental criteria	70

GRI INDEX

GRI 400: SOCIAL STANDARDS

Standard		Content	Page / direct response or reason for omission
GRI 403 Occupational Health and Safety 2018	403-1	Occupational health and safety management system	60
	403-2	Hazard identification, risk assessment, and incident investigation	61-63
	403-3	Occupational health services	66
	403-4	Worker participation, consultation, and communication on OHS	66
	403-5	Worker training on occupational health and safety	64
	403-6	Promotion of worker health	67
	403-8	Workers covered by an OHS management system	60
	403-9	Work-related injuries	65
GRI 405 Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	58
GRI 408 Child Labor 2016	408-1	Operations and suppliers at significant risk for incidents of child labor	70
GRI 409 Forced or Compulsory Labor 2016	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	70
GRI 413 Local Communities 2017	413-1	Operations with local community engagement, impact assessments, and development programs	71-76
GRI 414 Supplier Social Assessment 2016	414-1	New suppliers screened using social criteria	68-69
	414-2	Negative social impacts in the supply chain and actions taken	68-69

SASB INDEX

Standard	Content	Page / direct response or reason for omission
IF-EU-140a.1	Water	55
IF-EU-320a.1	Health and safety	65
IF-EU-000-A	Customers	41-42
IF-EU-240a.1	Tariffs	43
IF-EU-000-B	Energy supplied	41-42
IF-EU-000-C	Transmission lines	44
IF-EU-000-D	Markets	41-43

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