



Stakeholder Engagement Policy

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Policy Objectives and Focus

The Stakeholder Engagement Policy (“**Policy**”) of Hyperion Renewables (“**Hyperion**”) aims primarily to **affirm Hyperion’s long-term commitments to the stakeholders involved in each of its projects**. When planning each new project, and throughout all stages of its development, from licensing, construction and operation to decommissioning, Hyperion defines tailored approaches based on the concerns and material topics relevant in each region. These are the topics of greatest significance to stakeholders and with the highest impact on the business, with the objective of fostering relationships, mitigating risks, and enhancing the benefits of the project within the local community.

The Policy aligns with Hyperion’s global strategy in setting out its specific objectives:

Structure relationships and ensure transparency

The stakeholder engagement process is structured as a mechanism for building trust, mutual respect, and shared benefits between Hyperion and its various stakeholder groups. Acknowledging that the level of engagement must be adapted to the relevance and influence of each stakeholder, Hyperion adopts differentiated **engagement levels** — low, medium, or high — defined based on the group’s importance and the material topics involved. These levels guide the choice of progressively deeper **engagement approaches**: from basic monitoring and information sharing to consultation and direct involvement, and even to more collaborative forms such as partnerships and joint decision-making.

These approaches help strengthen relationships with local communities, public authorities, civil society organizations, and other actors, ensuring the legitimacy and social license to operate in each territory, understood as the informal yet essential acceptance by communities and stakeholders of Hyperion’s presence and activity.

Remain open to adapting to local realities and updating the Policy

This Policy is guided by the principle of adaptability, recognizing that each territory has distinct socio-cultural, environmental, and economic characteristics. Hyperion therefore commits to systematically assessing the specificities of each area in which it operates, through social diagnostics and stakeholder mapping, which makes it possible to adjust methods, messages, and communication channels to local expectations, needs, and concerns.

As for keeping the Policy up to date, Hyperion will review and revise it whenever monitoring results, stakeholder feedback, or changes in the legal and regulatory framework justify it. This commitment ensures the relevance and effectiveness of the Policy, aligning it with evolving contexts and continuous improvement principles.

Provide strategic guidance for project communication plans

This Policy serves as the strategic framework for developing specific communication plans to be implemented in each project. Accordingly, each project must begin with a stakeholder diagnosis and a material topic assessment, using participatory methodologies. Based on this diagnosis, specific communication objectives, priority content, tools, and appropriate channels for each target audience will be defined.

Communication plans must also consider the levels of engagement assigned to each stakeholder group based on their influence and the material issues involved. As mentioned previously, these levels guide the adoption of progressive engagement approaches — from basic monitoring and information sharing to active collaboration and capacity building — allowing the degree of engagement to be adjusted to each stakeholder’s needs and expectations. These plans should also include mechanisms for active listening, complaint management, and feedback, enabling the assessment of satisfaction levels and identification of continuous improvement opportunities.

In this way, Hyperion promotes an informed, inclusive, and people-centered approach, capable of mitigating risks and enhancing the shared value of its projects.

Scope of Application

This Stakeholder Engagement Policy applies globally to all of Hyperion's activities and should serve as the starting point for developing the action plans of each project, beginning at the development phase.

The Policy incorporates the ESG guidelines set out by Hyperion's current shareholders, ensuring the systematic integration of Environmental, Social and Governance principles into the action plans developed for each new local community, specifically reflecting the Stakeholder Engagement & Grievance Mechanisms principles defined in Hyperion's ESG guidelines.

The Policy is also aligned with the principles and guidelines of **Hyperion's Code of Conduct and Ethics**, reflecting the company's commitment to the law, human rights, environmental sustainability and transparency. It operationalizes the ethical values defined in the Code, promoting a responsible, inclusive and diligent relationship with stakeholders, particularly in relation to non-discrimination, active listening, protection of confidentiality, anti-corruption efforts, and the promotion of positive social and environmental impacts.

The scope of application of the Policy can be defined from different analytical perspectives:

A. Impact

Under this Policy, all relevant territorial impacts must be considered, classified across environmental, social, economic, and cultural dimensions. The identification and characterization of these impacts will be carried out through Environmental Impact Assessments (EIAs) and/ or Local Diagnostics, depending on the specific requirements applicable to each project.

B. Organization

All operational areas of Hyperion must be aware of this Policy and understand its application across projects. Internal information-sharing is structured (through formal team-wide sharing sessions), with more detail provided for project-specific action plans.

C. Geography

Every project, regardless of location, must apply the principles and processes set out in this Policy. This includes conducting an initial local diagnostic to inform and adapt the action plan to each stakeholder landscape.

D. Implementation Phase

The Policy applies throughout every project phase, from planning to decommissioning, including construction and operation. Each action plan must specify how each activity unfolds at each stage.

Principles of Stakeholder Engagement with a focus on Relevance and Community Benefit

This Policy reflects Hyperion's global commitment to all stakeholders who may affect or be affected by its projects. Each project's action plan reinforces this commitment by structuring engagement efforts and establishing specific indicators and monitoring processes. The company follows these guiding principles in stakeholder relationships:

Responsibility

Hyperion acts responsibly, respecting the law, human rights, and ethical principles aligned with its long-term presence in the territories. This translates into diligent, transparent practices in line with international standards on social and environmental responsibility.

Transparency

Hyperion ensures the clear, rigorous, and accessible sharing of relevant information, enabling stakeholders to understand projects, impacts, and benefits, and participate in an informed way. Transparency is essential to build trust and credibility.

Dialogue and Engagement

Hyperion prioritizes open, constructive, and ongoing dialogue with all interested parties, promoting active listening from the earliest planning stages of each project. Hyperion fosters effective stakeholder participation through active listening, particularly when legitimate interests or relevant impacts are at stake. Stakeholder engagement follows an inclusive logic, ensuring that all relevant groups, including those less represented or with limited access to information, have real opportunities for participation.

Collaboration and Co-Creation

Whenever possible, Hyperion co-develops solutions with local stakeholders, fostering synergies, leveraging resources, and designing initiatives that address shared needs.

Inclusion and Proximity

Ongoing presence and availability of direct contact with stakeholders are critical to building trust. Hyperion values both human and institutional proximity, maintaining open communication channels throughout the project lifecycle.

Continuous Improvement

Stakeholder engagement is seen as a dynamic, evolving process. The company commits to continuously improving its practices by integrating lessons learned, new methodologies, and feedback over time.

Global Commitments

Hyperion's operations in each territory are based on the recognition of its responsibility as a promoter of renewable energy projects with multiple both positive and negative impacts from different perspectives: environmental, social, economic, and cultural.

Regardless of project location or type, the company consistently and comprehensively assumes the following global commitments to its stakeholders.

Compliance with local applicable legislation

Hyperion commits to fully complying with all applicable legislation regarding land-use planning and nature conservation in the context of locating, developing, and operating photovoltaic power plants. This includes compliance with Land-Use Planning Laws, the legal framework for Municipal Master Plans and their respective regulations, and the Natura 2000 Network concerning habitats and biodiversity, as well as other urban planning constraints for the protection of nature and ecology such as the RAN and REN regimes. The commitment extends to all complementary local legislation related to land use and occupation, environmental protection, and technical construction standards, safeguarding the integrity of the local territory.

Maintain availability and presence in the territory

Hyperion ensures active, close, and accessible presence throughout all project lifecycle phases. This physical and institutional presence allows the company to listen, clarify, act, and respond quickly and appropriately to stakeholder concerns and expectations.

Communicate clearly, proactively, and accessibly

Hyperion commits to maintaining regular, clear, and audience-appropriate communication, providing relevant and up-to-date information about the project. Such communication will be conducted with due accuracy and will respect business confidentiality and strategic aspects, while also including details about impacts, benefits, mitigation measures, and compensations.

Ensure active listening and meaningful participation

Hyperion is committed to creating genuine opportunities for participation, collecting input and, whenever possible, incorporating suggestions and concerns into decision-making processes.

Respect local specificities

Hyperion's actions are always sensitive to the unique social, environmental, cultural, and institutional characteristics of each territory, respecting local identity, heritage, and dynamics.

Prevent and mitigate negative impacts

Hyperion undertakes to assess the potential impacts of its projects rigorously and in advance, adopting suitable prevention, mitigation, or compensation measures, in dialogue with the affected stakeholders.

Support the local economy

Hyperion promotes value creation and sharing in the territories where it operates through social investments, economic opportunities, local employment, partnerships with local actors, and initiatives that generate a positive community impact.

Effectively manage complaints and conflicts

Hyperion provides accessible and effective mechanisms for submitting and managing complaints, suggestions, or concerns, namely through the email contact compliance@hyperionrenewables.com. It commits to analyzing and responding in a transparent, timely, and impartial manner, contributing to constructive resolution.

These commitments are the foundation of Hyperion's ethical, transparent, and responsible conduct in each territory. By embracing them, the company reinforces its ambition to build lasting and mutually beneficial relationships with all stakeholders.

General Procedures for Stakeholder Engagement

Hyperion has established a structured and adaptable stakeholder engagement process for each project, covering all phases of the project lifecycle — **planning/ licensing, construction, operation, and decommissioning**. This process is grounded in the Stakeholder Engagement Policy and ensures continuous, meaningful, and context-specific stakeholder integration. To ensure this engagement throughout each project phase, Hyperion follows the framework outlined below:



5.1. Initial Diagnosis and Mapping

Before defining any action plan, Hyperion conducts a **social assessment of the region**, with a particular focus on the most affected communities and groups in vulnerable situations. This diagnosis identifies local needs across social, environmental, economic, and cultural dimensions. It includes:

- Initial identification of stakeholders based on the AA1000 Stakeholder Engagement Standard: dependency, responsibility, tension, influence, and diversity of perspectives.
- Use of complementary criteria such as the level of impact from activities, the vulnerability of affected groups, and the degree of institutional or community representativeness of stakeholders.
- Preliminary consultation to gather concerns, expectations, and priorities.
- Mapping of potential negative impacts and identification of material topics.
- Definition of the purpose and scope of engagement for the project.

5.2. Engagement Planning and Preparation

Based on the diagnostic results, a **tailored engagement and communication plan** is developed for the project. This plan includes:

- Concrete objectives for engagement with each stakeholder group.
- Definition of the most suitable channels and approaches (e.g., public consultations, individual meetings, community forums).
- A timeline aligned with the project schedule.
- A communication and information-sharing strategy.

At this stage, a preliminary version of the **Local Action Plan** (*to be developed as described in section 6 of this Policy*) is also prepared and presented to stakeholders for feedback.

5.3. Implementation and Annual Listening Cycle

During the implementation of the engagement plan, Hyperion commits to an **annual active listening cycle**, a structured and continuous practice of listening and dialogue with stakeholders across all project phases (development, construction, operation, and decommissioning). This cycle preferably takes place between September and November, ensuring that relevant input is collected in time for inclusion in the planning and reporting processes of the following year, and aligning effectively with ongoing monitoring mechanisms.

This cycle includes:

- Regular sharing of updated information on project development through predefined communication channels (e.g. public sessions, newsletters, digital platforms), conducted with due diligence and safeguarding strategic and confidential business aspects.
- Systematic collection of input and perceptions regarding experienced impacts, emerging needs, and suggestions for improvement from stakeholders.
- Individual and collective meetings with the most relevant stakeholders (e.g. local authorities, associations, NGOs, community leaders), promoting close and constructive dialogue.
- Activation of local partnerships and monitoring of the implementation of planned engagement actions.
- Follow-up and evaluation of the effectiveness of communication and engagement approaches, in coordination with project monitoring mechanisms and periodic reviews, including disclosure of results in the annual reports referred to in Chapter 7.

5.4. Monitoring and Review

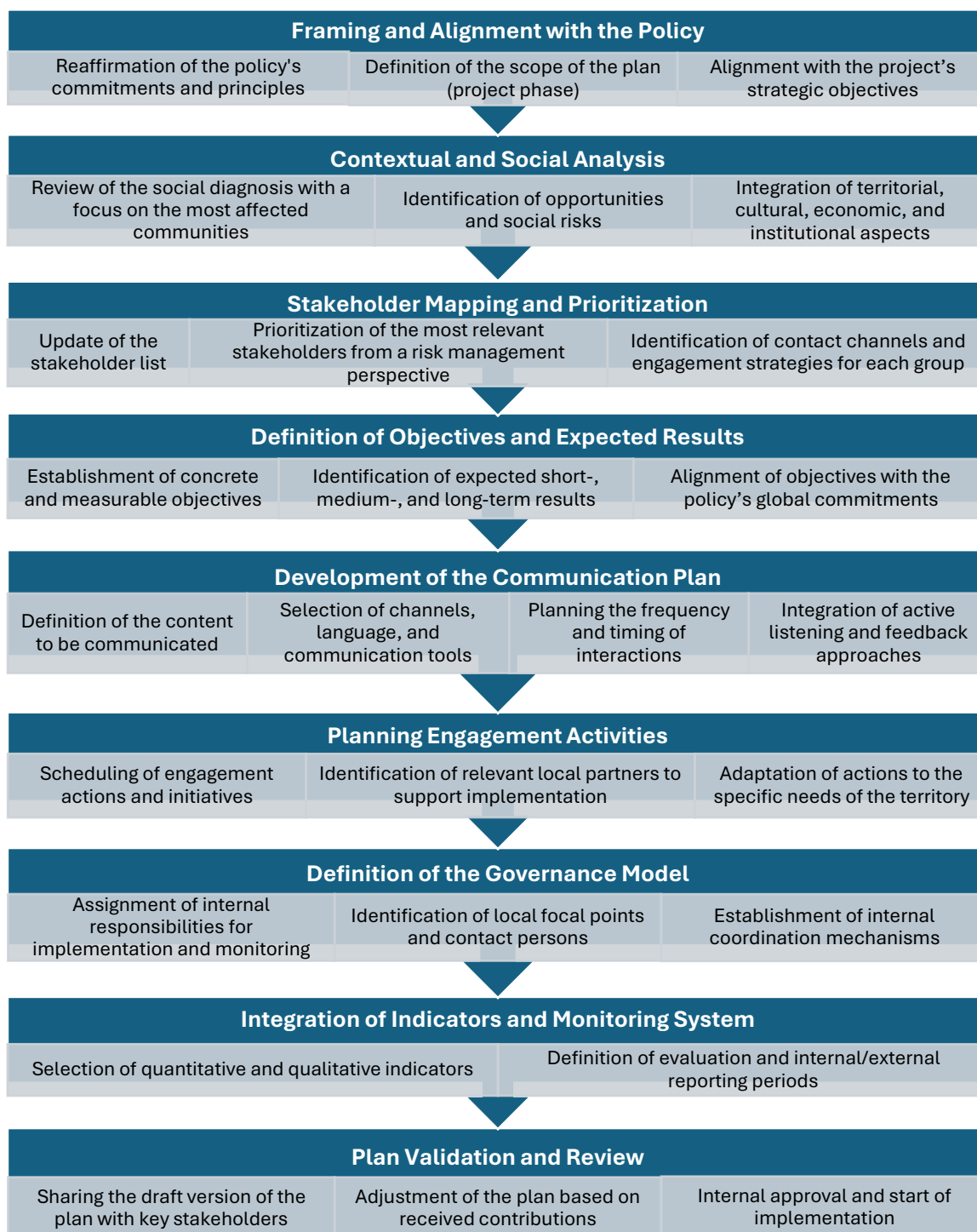
Monitoring is a central component to ensure the coherence and effectiveness of stakeholder engagement. This phase includes:

- Implementation of a monitoring plan aligned with the Policy's principles.
- Collection of **performance indicators** (KPIs), including those derived from stakeholder feedback.
- Systematic integration of collected data into future engagement cycles, with adjustments made as necessary.
- Evaluation of the impact of implemented actions, with transparent sharing of results.

Definition of Action Plans

This Stakeholder Engagement Policy serves as the guiding reference for the development of **specific action plans** to be implemented in each new Hyperion project. These plans operationalize the company's commitments, ensure consistency of practices in the territory, and adapt approaches to the social, institutional, and cultural realities of each context.

The definition of an action plan must follow a structured methodology, consisting of the following steps:



Each local action plan must be regarded as a living document, subject to regular reviews and adjustments whenever justified.

Monitoring, Reporting and Feedback integration

Systematic monitoring and transparent reporting of stakeholder engagement processes and results are essential to ensure the effectiveness of Hyperion's Stakeholder Engagement Policy. This section defines the principles and procedures to be followed, ensuring continuous learning, improvement of action plans, and regular policy updates.

The main objectives of monitoring and reporting are:

- To track the implementation of local action plans and assess the effectiveness of communication and engagement strategies;
- To verify compliance with the commitments made to stakeholders;
- To measure the impacts and outcomes of the actions undertaken;
- To collect structured input for the continuous improvement of the company's practices and for the review of the Policy.

Performance Indicators

Each action plan must define its own set of indicators, tailored to the project's context and stage. As guidance, and according to different monitoring domains, the following indicators should be considered:

Domain	Indicator	Unit
Engagement	Number of interactions with stakeholders (meetings, forums, contacts)	Number
Engagement	Degree of stakeholder input integration into plans	%
Engagement	Stakeholder satisfaction with the engagement process	Scale (survey)
Communication	Frequency of information updates to stakeholders	Number/year
Communication	Access/use rate of communication channels (website, phone, email)	%
Local Procurement	% of total purchases from local suppliers	%
Local Procurement	Number of contracts with local suppliers	Number
Complaints & Suggestions	Number of complaints and suggestions received	Number
Complaints & Suggestions	Average response time to complaints	Business days
Complaints & Suggestions	Complaint resolution rate	Scale

In qualitative terms, additional information must also be collected and analysed within each domain, namely through questionnaires and interviews with stakeholders.

This will allow for the assessment of aspects such as quality of information shared; effectiveness of listening mechanisms; integration of input into projects; adequacy of responses to expressed concerns; co-developed initiatives with local actors; level of trust and quality of relationships; and improvements in relations as a result of responses to complaints and suggestions.

Internal and External Reporting

- **Internal reporting:** Collected data must be compiled into regular reports and shared with the relevant departments of the company to ensure coordination and shared accountability.
- **External reporting:** Whenever appropriate and depending on the relevance and sensitivity of the project, Hyperion may publish stakeholder engagement reports, reinforcing transparency and accountability to communities and institutional partners.

Feedback Integration

Feedback gathered from stakeholders, especially through the **annual active listening cycle**, is essential for the evolution of both the Policy and the action plans. In this regard, it is vital to:

- Periodically assess the Policy's adequacy considering local realities and emerging challenges.
- Review the Policy whenever monitoring data and stakeholder feedback reveal gaps, opportunities for improvement, or significant contextual changes.
- Share lessons learned and identified good practices internally, promoting cross-organizational learning.
- Involve key stakeholders in Policy review moments, whenever appropriate, thereby reinforcing the legitimacy of the process.

This approach ensures that Hyperion's Stakeholder Engagement Policy is not a static document but rather a dynamic instrument rooted in listening, learning, and an ongoing commitment to the creation of shared value.