



Diversity & Inclusion Policy

ATLAS RENEWABLE ENERGY

Diversity & Inclusion Comitee



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I. INTRODUCTION

Atlas Renewable Energy (“we,” “us,” and/or “Atlas”) is a company committed to accelerating transformation towards clean energy by developing, building, and operating large-scale renewable energy projects in the LatAm region. Atlas is based in the United States and, as of this date, has operations in Brazil, Chile, Mexico and Uruguay. As such, we strive to create an inclusive environment that embraces diversity, fosters inclusion, and fights against any form of discrimination.

We believe that valuing diversity and inclusiveness is a competitive differentiator which enable us to achieve our vision to create unmatched value for all of our stakeholders, including but not limited to, our colleagues, collaborators, business associates, suppliers, communities, clients, and future generations. For this purpose, we have built a strong anti-discrimination policy, which means that not only we do not discriminate on grounds of gender (including gender identity and/or gender expression), ethnicity, race, religion or belief, culture, nationality or national origin, language differences, sexual orientation, physical, mental and development abilities, biotype, political affiliations, socio-economic status, age, marital status, or any other, but also, that we are **actively against any form of discrimination** – silence is not an option for Atlas.

II. SCOPE

This Diversity and Inclusion Policy (the “D&I Policy”) applies to all Atlas’s employees, as well as all consultants, advisors, agents, representatives, and business associates that are acting on behalf of and in direct representation of Atlas. It is intended to complement local statutory provisions, and Atlas’s Staff Handbook and Code of Conduct, as applicable

III. D&I POLICY STATEMENT AND REQUIREMENTS

Atlas embraces and supports our employees’ differences in gender (including gender identity and/or gender expression), ethnicity, race, religion or belief, culture, nationality or national origin, language differences, sexual orientation, physical, mental and development abilities, biotype, political affiliations, socio-economic status, age, marital status, and any other characteristic not listed previously, that makes each of us unique.

III.A OUR COMMITMENT

Our commitment to diversity and inclusion aligns with our values of people and respect, and it is reflected in our global Staff Handbook and Code of Conduct. Diversity and inclusion are sponsored at Atlas’s leadership levels and initiatives are applicable — but not limited — to our practices and policies on recruitment and selection, compensation and benefits, professional development and training, promotions, transfers, social and recreational programs, layoffs, terminations, and the ongoing development of a working environment built on the premise of equity that ensures:

- A diverse and inclusive culture is recognized as a business goal, with every level of the organization being accountable.
- Communication is open and respectful between all employees regardless of their area or level.
- Insights of diverse groups and different points of view are sought, encouraged, and welcomed; employees are embraced in their uniqueness and not alienated or excluded because of differences in cultural norms.
- An environment where employees feel that their unique backgrounds and characteristics are considered to promote equity and equal access to opportunities, ensuring no discrimination will be an obstacle to professional growth.
- A compensations and benefits strategy is available to promote and enhance co-parental responsibilities and parental leaves, which applies to heterosexual, homosexual and mono-parental families.
- Inclusive behaviour and ever-growing diversity, especially intersectional diversity of our workforce is visible at every level of the organization and in every business area.
- Employees are constantly trained and mentored to be aware of their own unconscious and conscious biases and to prevent these from manifesting themselves at work.
- In respecting and valuing the diversity among our employees, and all those with whom we do business, managers and

employees are expected to ensure that there is a work environment free of and against all forms of discrimination, and harassment.

- No kind of harassment, mobbing and/or inappropriate jokes or behavior will be tolerated.
- Diversity and Inclusion within our business partners, contractors, consultants, and suppliers is encouraged and shall be taken into consideration when engaging in activities with third parties.

III.B MANAGERS RESPONSIBILITY

Atlas's managers shall have the duty and responsibility to:

- Implement this D&I Policy as part of their day-to-day management of employees and stakeholders and apply policies and practices in a fair and equitable way.
- Recognize unacceptable behavior and take immediate appropriate action.
- Promote an active inclusive and anti-discrimination work environment, culture, and language to avoid stereotypes and unconscious biases.
- Mentor direct reports and others who they deem appropriate to correct and promote a respectful and open environment, communication, and behaviors.
- Actively participate in and promote all mandatory trainings and activities promoting diversity and inclusion.
- Take advantage of all benefits, without withholding any such benefit to anyone; and, rather, to promote this behavior amongst their direct reports.

III.C EMPLOYEES RESPONSIBILITIES

Atlas's employees shall have the duty and responsibility to:

- Implement this D&I Policy in their day-to-day work and their dealings with colleagues, communities, and business partners.
- Actively participate in and implement/put in practice all mandatory trainings regarding diversity and inclusion within Atlas.
- Notify their line manager, senior manager and/or use the reporting mechanism provided in Section VI of this D&I Policy regarding any concerns, potential violations to this D&I Policy or situations related to the conduct of other employees, managers and/or business partners.

IV. DIVERSITY AND INCLUSION COMMITTEE

Atlas has recognized the value of allowing groups of employees with common interests to formalize their professional relationship by promoting the creation of a Diversity & Inclusion Committee ("**D&I**"). The D&I is a welcoming space in Atlas, everyone can join and participate on a voluntary basis, sharing personal experiences, concerns, and initiatives to achieve our common goal. The D&I has its own governance structure and independence from the rest of Atlas's areas. The D&I may request its own budget to implement certain activities that are deemed appropriate by its own members, and that do not already correspond to other functions, pursuant to Atlas's internal policies and guidelines.

The D&I can provide cultural expertise, and personal or group insights to Atlas's employees and businesses in ways that can enable the company to improve recruiting and retention, build cultural competence and leadership effectiveness, facilitate relationships

between our organization and external suppliers and constituencies, as applicable, and support specific business projects and initiatives.

V. RELATIONSHIP WITH THIRD PARTIES

Atlas shall use their commercially reasonable efforts to engage with third parties that respect and embrace Diversity & Inclusion initiatives and our D&I Policy. Third Parties partners shall acknowledge the principles set forth in this D&I Policy and recognize that these constitute an important factor for engaging in any business relationship with Atlas.

For this purpose, and to the extent it is possible, in order to promote and ensure that we are consistent with our goals and business practices, when contracting with any kind of third party for the provision of services for any amount above USD10,000 (or the equivalent in R\$, CLP and MXN\$), considering the full amount of the engagement, including, but not limited to, construction, financial and/or legal advisors, auditors, and/or IT Services, the manager in charge of such engagement process shall require certain information about diversity regarding the team that will be working for such engagement and the company in general. This request can include the disclosure of the composition and representation of diversity groups as team members, the D&I initiatives and policies implemented by the third party, among others.

This information will be considered as an important factor for making our hiring decision.

VI. REPORTING SYSTEM AND ACCOMODATIONS

VI.A REPORTING SYSTEM

If an employee believes that he or she are being subject of discrimination in any form, or has witnessed an act or violation to this D&I Policy, the employee should report the facts of the incident in accordance with the procedures set forth below:

a) Direct Reporting

If the report is related to a violation of this D&I Policy the employee can approach the corresponding People Department representative (local and/or regional), General Counsel, General Manager and/or direct supervisor.

b) Helpline Web-based Reporting

In addition, employees may report the matter through an independent, confidential and secure Reporting System called IRIS. The service will be available 24 hours a day, and in three languages: English, Spanish and Portuguese.

For telephone reports the following toll-free numbers are available:

- United States: 1-800-469-1809
- Chile: 800 914 453
- Mexico: 800-099-1575
- Brazil: 0800-200-3522

For reports via web platform, the following links are available:

- IRIS in English: <https://www.atlasrenewableenergy.com/en/contact/iris/>
- IRIS in Spanish: <https://www.atlasrenewableenergy.com/contacto/iris/>
- IRIS in Portuguese: <https://www.atlasrenewableenergy.com/pt-br/contatenos/iris/>

VI.B ACCOMMODATIONS

Atlas respects the needs that any and all employees may have regarding cultural traditions or practices, religious beliefs, disabilities, biotypes, life stage or age, amongst others, and will make, on request, accommodation for such observances when a reasonable accommodation is available that does not create an undue hardship on the company's business.

a) Requesting a Religious or Cultural Accommodation

An employee whose religious beliefs or cultural practices conflict with his or her job, work schedule, or with other aspects of employment, and who seeks a religious or cultural accommodation should make a request for the accommodation to People's manager. The request should include the type of religious conflict that exists and the employee's suggested accommodation.

b) Special Accommodations

Atlas values the contributions of persons with differing abilities and biotypes. We are committed to the inclusion of persons with special needs in our workforce. We do not discriminate on the basis of any known mental or physical condition that is protected by law, a history of disability, a perceived condition or an association with someone with a known condition for which will require special accommodations. Our policy applies to job application procedures, hiring, termination, professional development within the company, compensation, job training, relocation, and other aspects of employment. We recognize that at some time during the employment relationship an employee may require a reasonable accommodation to perform the essential functions of such employees' work.

c) Requesting a Disabilities Accommodation

Requests for accommodations are voluntary and **confidential**. If an employee requires an accommodation during the employment relationship, such employee shall inform their manager and/or People. We will work to determine whether an accommodation will enable such employee to perform the essential functions of his or her work. Additionally, there may be times when we recognize that a particular employee may need an accommodation and will offer one accordingly. An employee may obtain a description of his or her position for such employee's physician's review upon request to the employee's manager or People.

An employee may be requested, on a voluntary and confidential basis, to provide information from such employee's doctor to determine what reasonable accommodations may be available to the latter. **Any information provided will remain confidential.**

VII. CONSEQUENCES OF VIOLATING THE D&I POLICY

Atlas will make every reasonable effort to prevent the occurrence of a misconduct or violation of this D&I Policy and to halt any such conduct that may occur as soon as reasonably possible after its discovery. Violation of the D&I Policy subjects the employee to disciplinary action, including, but not limited to, possible suspension or termination of employment and such other action as Atlas believes to be appropriate under the circumstances.

The People Department shall be involved in decisions regarding follow-up or disciplinary actions to drive consistent administration of disciplinary actions across the organization, while taking into consideration the unique characteristics of a particular situation.

Employees are protected from retaliation for opposing unlawful discrimination practices, for having in good faith reported any event pursuant to the above, and/or for having assisted another employee to report an event.

VIII. POLICY REVIEW

This Policy will be reviewed annually or as it is deemed appropriate.