



Sustainability
Report 2019

Annexes

The annexes include detailed information on the scope and perimeter of the report, as well as the independent external verification report and its relationship with the 10 Principles of the Global Compact.



Annex 1 ▶
Independent Review Report



◀ **Annex 2**
Report Profile



Annex 3 ▶
GRI Content Index



◀ **Annex 4**
Content in relation to the
Principles of the Global Compact



Annex 5 ▶
Perimeter

Independent Review Report



Ernst & Young, S.L.
Calle de Raimundo Fernández
Villaverde, 65 28003 Madrid

Tel: 902 365 456
Fax: 915 727 238
ey.com

INDEPENDENT LIMITED ASSURANCE REPORT OF THE SUSTAINABILITY REPORT 2019 OF ELAWAN ENERGY, S.L.

To the Management of Elawan Energy, S.L.:

Scope

As commissioned by the Management of Elawan Energy, S.L. and subsidiaries (hereinafter, Elawan), we have carried out the review of the "Sustainability Report 2019". This information has been prepared in accordance with GRI Sustainability Reporting Standards (GRI Standards) comprehensive option, as detailed in "Report profile".

The scope considered by Elawan for the preparation of the Report is defined in "Scope considered of Elawan and subsidiaries".

The preparation of the "Sustainability Report 2019", as well as its content, is the responsibility of the Management of Elawan, which is also responsible for defining, adapting and maintaining the management and internal control systems from which the information is obtained. Our responsibility is to issue an independent report based on the procedures applied in our review.

Criteria

Our review was carried out based on:

- ▶ The guidelines for reviewing Corporate Responsibility Reports, issued by the Spanish Official Register of Auditors of Accounts (ICJCE).
- ▶ Standard ISAE 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standard Board (IAASB) of the International Federation of Accountants (IFAC), with a limited assurance scope.

Applied procedures

Our review consisted in requesting information from the Sustainability Department and the various business units participating in the preparation of the "Sustainability Report 2019", applying processes and analytical procedures, and sampling review tests as described in the general terms below:

- ▶ Interviews with the staff in charge of the preparation of the sustainability information in order to gain a deep understanding of how the objectives and sustainability policies are considered, set into practice, and integrated within Elawan's global strategy.
- ▶ Reviewing the processes for the compilation and validation of the information presented in the Report.
- ▶ Checking the processes held by Elawan in order to define the material aspects and stakeholder participation.
- ▶ Reviewing the adaptation of the structure and content of the Report, as indicated in the GRI Standards sustainability reporting framework of the Global Reporting Initiative, in accordance with the comprehensive option.

- ▶ Checking selected samples of the quantitative and qualitative information of the contents included in the "Sustainability Report 2019", as well as their adequate compilation from data supplied by information sources. The review tests have been defined to provide the aforementioned assurance levels.

- ▶ Checking that the financial information included in the Report has been audited by independent third parties.

These procedures have been applied to the contents in Annex "GRI Content Index", with the aforementioned scope.

The scope of our review is considerably lower than a reasonable assurance report. Therefore, the degree of assurance is also less extensive. This report in no case should be considered as an audit report.

Independence and quality control

We have complied with the requirements of independence and the other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA, for its acronym in English).

Our firm applies the International Standard on Quality Control 1 (ISQC 1) and maintains, as a result, a global quality control system that includes documented policies and procedures related to compliance with ethical requirements, professional standards, and legal and regulatory provisions.

Our work has been performed by a team of sustainability experts with a wide experience in reviewing this type of information.

Conclusions

As a result of our limited review, we conclude that no matter came to our attention that would indicate that the "Sustainability Report 2019" has not been prepared, in all material respects, according to the GRI Standards sustainability reporting framework, which includes the data reliability, the adequacy of the information presented and the absence of significant deviations and omissions.

This report has been prepared solely for the management of Elawan, in accordance with the terms set out in our engagement letter.

ERNST & YOUNG, S.L.

(Free translation from the Original Report on Independent Review in Spanish dated July 17th, 2020. In the event of any discrepancy, the Spanish version always prevails.)

ANNEX 2

Report profile 102-46

The Sustainability Report was created in accordance with the information and indicators established in the reference guide of the comprehensive option of the "GRI Standards", (102-54) and the relevant matters that arise from our Materiality Study, as an integral part of our commitment to the Sustainable Development Goals.

The table of contents can be found in the Annex of this report, together with the independent external verification report done by the company EY (102-56).

The goal is to communicate the most relevant aspects and initiatives, with an approach that is aligned with our way to understand sustainability and its impact on the management of the company.

Presentation Cycle

The Report has an annual periodicity (102-52), and encompasses the information covered between January 1st 2019 and December 31th 2019 (102-50), the last report being the one corresponding to the year 2018 (102-51).

Significant Changes

Respecting to the previous year, the main changes are the wind farm in Hannut (Belgium) and the photovoltaic plants in Torrijos (Spain) and Rzapin (Poland) have been included in the scope of the report. Minor changes are indicated in the corresponding sections (102-49).

There has not been any restatement of information regarding the previous financial year (102-48), nor were there any changes in the supply chain (102-10).

Information 102-53

rsc@elawan.com
+34 91 379 10 00
C/ Ombú 3, floor 10.
28045 Madrid. Spain

ANNEX 3

GRI Content Index 102-55

The contents of this index have been externally verified by the independent entity EY. The related independent review report for verification can be found in the Annex of this document. Information omissions are included as a note in italics on appropriate indicators.

GRI Standards	Content	Page/ Omission	Review
GRI 101: Foundation			
GRI 102: General Content			
Organizational profile	102-1 Name of the organization	9	√
	102-2 Activities, brands, products, and services	9	√
	102-3 Location of headquarters	9	√
	102-4 Location of operations	12 and 13	√
	102-5 Ownership and legal form	23	√
	102-6 Markets served	9, 12 and 13	√
	102-7 Scale of the organization	10 and 11	√
	102-8 Information on employees and other workers	43 and 45	√
	102-9 Supply chain	41	√
	102-10 Significant changes to the organization and its supply chain	64	√
	102-11 Precautionary Principle or approach	36	√
	102-12 External initiatives	52	√
	102-13 Membership of associations	21	√
Strategy	102-14 Statement from senior decision-maker	4-7	√
	102-15 Key impacts, risks, and opportunities	34-36	√

GRI Standards	Content	Page/ Omission	Review
Ethics and integrity	102-16 Values, principles, standards, and norms of behavior	27	✓
	102-17 Mechanisms for advice and concerns about ethics	27	✓
Governance	102-18 Governance structure	23	✓
	102-19 Delegating authority	23	✓
	102-20 Executive-level responsibility for economic, environmental, and social topics.	24	✓
	102-21 Consulting stakeholders on economic, environmental, and social topics.	24	✓
	102-22 Composition of the highest governance body and its committees	24	✓
	102-23 Chair of the highest governance body	23	✓
	102-24 Nominating and selecting the highest governance body	24	✓
	102-25 Conflicts of interest	24	✓
	102-26 Role of highest governance body in setting purpose, values, and strategy	24	✓
	102-27 Collective knowledge of highest governance body	24	✓
	102-28 Evaluating the highest governance body's performance	25	✓
	102-29 Identifying and managing economic, environmental, and social impacts.	25	✓
	102-30 Effectiveness of risk management processes	25	✓
	102-31 Review of economic, environmental, and social topics	25	✓
	102-32 Highest governance body's role in sustainability reporting	24	✓
	102-33 Communicating critical concerns	24	✓
	102-34 Nature and total number of critical concerns	25	✓
	102-35 Remuneration policies	25	✓
	102-36 Process for determining remuneration	25	✓
102-37 Stakeholders' involvement in remuneration	25	✓	
102-38 Annual total compensation ratio	Note A	✓	
102-39 Percentage increase in annual total compensation ratio	Note A	✓	
Stakeholder engagement	102-40 List of stakeholder groups	19	✓
	102-41 Collective bargaining agreements	46	✓
	102-42 Identifying and selecting stakeholders	19	✓
	102-43 Approach to stakeholder engagement	19	✓
	102-44 Key topics and concerns raised	20	✓
Reporting practice	102-45 Entities included in the consolidated financial statements	71	✓
	102-46 Defining report content and topic Boundaries	20 and 64	✓
	102-47 List of material topics	20	✓
	102-48 Restatements of information	64	✓
	102-49 Changes in reporting	64	✓
	102-50 Reporting period	64	✓
	102-51 Date of most recent report	64	✓
	102-52 Reporting cycle	64	✓
	102-53 Contact point for questions regarding the report	64	✓
	102-54 Claims of reporting in accordance with the GRI Standards	64	✓
	102-55 GRI content index	64-69	✓
	102-56 External assurance	64	✓

NOTA A: Información confidencial.

GRI Standards	Content	Page/ Omission	Review
Materiality topics			
ECONOMIC PERFORMANCE			
Management Approach			
GRI 103: Management Approach. It is applicable to all indicators reported in this section Economic Dimension.	103-1 Explanation of the material topic and its Boundary	29	√
	103-2 The management approach and its components	29	√
	103-3 Evaluation of the management approach	29	√
Economic Performance			
GRI 201: Economic Performance	201-1 Direct economic value generated and distributed	32	√
	201-2 Financial implications and other risk and opportunities due to climate change	60	√
	201-3 Defined benefit plan obligations and other retirement plans	Note B	√
	201-4 Financial assistance received from government	32	√
Market presence			
GRI 202: Market presence	202-1: Ratios of standard entry level wage by gender compared to local minimum wage	47	√
Procurement Practices			
GRI 204: Procurement Practices	204-1: Proportion of spending on local suppliers	41	√
Anticorruption			
GRI 205: Anti corruption	205-1: Operations assessed for risks related to corruption	27	√
	205-2: Communication and training about anti-corruption policies and procedures	27	√
	205-3: Confirmed incidents of corruption and actions taken	27	√
Anti-competitive Behavior			
GRI 206: Anti-competitive Behavior	206-1: Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	27	√

NOTE B: Elawan Energy does not have retirement plans for its professionals.

GRI Standards	Content	Page/ Omission	Review
Materiality topics			
ENVIRONMENTAL PERFORMANCE			
Management Approach			
GRI 103: Management Approach. It is applicable to all indicators reported in this section Environmental Dimension.	103-1 Explanation of the material topic and its Boundary	55	√
	103-2 The management approach and its components	55	√
	103-3 Evaluation of the management approach	55	√
Energy (no material))			
GRI 302: Energy	302-1: Energy consumption within the organization	59	√
	302-2: Energy consumption outside of the organization	59	√
	302-3: Energy intensity	59	√
	302-4: Reduction of energy consumption	56	√
	302-5: Reduction in energy requirements of products and services	Note C	√
Emissions (no material)			
GRI 305: Emissions	305-1: Direct (Scope 1) GHG emissions	61	√
	305-2: Energy indirect (Scope 2) GHG emissions	61	√
	305-3: Other indirect (Scope 3) GHG emissions	61	√
	305-4: GHG emissions intensity	61	√
	305-5: Reduction of GHG emissions	61	√
	305-6: Emissions of ozone-depleting substances (SDG)	61	√
Effluents and Waste			
GRI 306: Effluents and Waste	306-1: Water discharge by quality and destination	Note D	√
	306-2: Waste by type and disposal method	57	√
	306-3: Significant spills	57	√
	306-4: Transport of hazardous waste	57	√
	306-5: Water bodies affected by water discharges and/or runoff	Note E	√
Biodiversity			
GRI 304: Biodiversity	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	57	√
	304-2: Significant impacts of activities, products, and services on biodiversity	57	√
	304-3: Habitats protected or restored	57	√
	304-4: IUCN Red List species and national conservation list species with habitats in areas affected by operations	57	√
Environmental Compliance			
GRI 307: Environmental Compliance	307-1: Non-compliance with environmental laws and regulations	27 y 56	√

NOTE C: Not applicable. Our activity is the production of renewable energy.

NOTE D: In wind farms and solar plants, due to their activity, water discharge is irrelevant.

NOTE E: With respect to water collection and discharge, this is minimal as it only affects offices and is therefore not considered relevant..

GRI Standards	Content	Page/ Omission	Review
Materility topics			
SOCIAL PERFORMANCE			
Management Approach			
GRI 103: Management Approach. It is applicable to all indicators reported in this section Social Dimension.	103-1 Explanation of the material topic and its Boundary	43, 48, 52	√
	103-2 The management approach and its components	43, 48, 52	√
	103-3 Evaluation of the management approach	43, 48, 52	√
Employment			
GRI 401: Employment	401-1: New employee hires and employee turnover	44	√
	401-2: Benefits provided to full-time employees that are not provided to temporary or part-time employees	46	√
	401-3: Parental leave	46	√
Occupational Health and Safety			
GRI 403: Occupational Health and Safety	403-1: Workers representation in formal joint management-worker health and safety committees	50	√
	403-2: Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	51	√
	403-3: Workers with high incidence or high risk of diseases related to their occupation	51	√
	403-4: Health and safety topics covered in formal agreements with trade unions	50	√
Training and Education			
GRI 404: Training and Education	404-1: Average hours of training per year per employee	45	√
	404-2: Programs for upgrading employee skills and transition assistance programs	44	√
	404-3: Percentage of employees receiving regular performance and career development reviews	45	√
Diversity and Equal Opportunity (not material)			
GRI 405: Diversity and Equal Opportunity	405-1: Diversity of governance bodies and employees	46	√
Non discrimination			
GRI 406: Non discrimination	406-1: Incidents of discrimination and corrective actions taken	27	√

GRI Standards	Content	Page/ Omission	Review
Materility topics			
SOCIAL PERFORMANCE			
Freedom of Association			
GRI 407: Freedom of Association	407-1: Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk.	41	√
Child Labor			
GRI 408: Trabajo infantil	408-1: Operations and suppliers at significant risk for incidents of child labor	41, 46	√
Forced or Compulsory Labor			
GRI 409: Forced or Compulsory Labor	409-1: Operations and suppliers at significant risk for incidents of forced or compulsory labor	41, 46	√
Human Rights Assessment			
GRI 412: Human Rights Assessment	412-1: Operations that have been subject to human rights reviews or impact assessments	33 and 46	√
	412-2: Employee training on human rights policies or procedures.	40	√
	412-3: Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	33, 46	√
Comunidades locales			
GRI 413: Local Communities	413-1: Operations with local community engagement, impact assessments, and development programs	52	√
	413-2: Operations with significant actual and potential negative impacts on local communities	52	√
Public Policy			
GRI 415: Public Policy	415-1: Political contributions	21	√
Customer Health and Safety			
GRI 416: Customer Health and Safety	416-1: Assessment of the health and safety impacts of product and service categories	Nota F	√
	416-2: Incidents of non-compliance concerning the health and safety impacts of products and services	40	√
Marketing and Labeling			
GRI 417: Marketing and Labeling	417-1: Requirements for product and service information and labeling	40	√
	417-2: Incidents of non-compliance concerning product and service information and labeling	40	√
	417-3: Incidents of non-compliance concerning marketing communications	27	√
Customer Privacy			
GRI 418: Customer Privacy	418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data.	27	√
Socioeconomic Compliance			
GRI 419: Socioeconomic Compliance	419-1: Non-compliance with laws and regulations in the social and economic area	40	√

Nota F: Not applicable due to the type of product of our company.

ANNEX 4



Contents in relation to the Global Compact Principles

The following table shows the chapters of this report that provide the most relevant information regarding the 10 principles of the Global Compact, in addition to the one included on the management approaches of every GRI aspect. Each stakeholder can evaluate Elawan's progress concerning these principles by the following this table:

Aspect	UN Global Compact Principles	Progress included in chapter
Human Rights	Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.	Our vision on sustainability Governance and compliance model
	Principle 2: Make sure that they are not complicit in human rights abuses.	Our vision on sustainability Governance and compliance model
	Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	Social Dimension
Labour Rights	Principle 4: The elimination of all forms of forced and compulsory labour.	Social Dimension
	Principle 5: The effective abolition of child labour.	Our vision on sustainability Governance and compliance model
	Principle 6: The elimination of discrimination in respect of employment and occupation.	Our vision on sustainability Governance and compliance model
Environment	Principle 7: Businesses should support a precautionary approach to environmental challenges.	Environmental Dimension
	Principle 8: Undertake initiatives to promote greater environmental responsibility.	Environmental Dimension
	Principle 9: Encourage the development and diffusion of environmentally friendly technologies.	Environmental Dimension
Anti corruption	Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	Economic Dimension

ANNEX 5

Scope considered of Elawan and subsidiaries

102-45

Scope consolidation. The group was composed by the following companies at the end of 2019

Subsidiary/ Associated company	Country	Subsidiary/ Associated company	Country
Elawan Energy Developments, S.L.	Spain	Roth Rock Wind Farm, L.L.C.	USA
Parque Eólico Becerril, S.L.	Spain	Roth Rock Development Services, L.L.C.	USA
Elawan Energy Developments 1, S.L.	Spain	Gestamp Wind Puerto Rico, INC.	USA
Elawan Energy Developments 2, S.L.	Spain	Gestamp Wind San Juan, Inc.	USA
Elawan Energy Developments 3, S.L.	Spain	Punta Lima Holding Co., L.L.C.	USA
Elawan Energy Developments 4, S.L.	Spain	Punta Lima Development Services, LLC.	USA
KONESTICIAL, S.L.	Spain	TPW Petersburg, LLC	USA
ERGE Occidente, S.L.	Spain	Gestamp Wind North América, INC.	USA
Gestamp HC Eólica, S.L.	Spain	North Buffalo Wind, L.L.C.	USA
Gestamp Eólica Castilla La Mancha, S.L.	Spain	Paunee Wind Farm	USA
ERGE Aragón, S.L.	Spain	Gestamp Wind Indiana	USA
Fotovoltaica Torrijos, S.L.	Spain	GSQ, LLC	USA
ERGE Levante, S.L.	Spain	Gestamp Eólica Brasil, S.A.	Brazil
Desarrollos Eólicos del Norte, S.L.	Spain	Eólica Gravató-Generadora de Energía, S.A.	Brazil
PE Rondavino S.L.	Spain	Eólica Piravá-Generadora de Energía, S.A.	Brazil
PE Salguero S.L.	Spain	Gestamp Eólica Jardins, S.A.	Brazil
CB SE Camapanario Renovable	Spain	Gestamp Eólica Alvorada, S.A.	Brazil
Elawan Fotovoltaica Campanario 1, S.L.U.	Spain	Gestamp Eólica Agreste S.A.	Brazil
Elawan Fotovoltaica Campanario 2, S.L.U.	Spain	Macambiras Holdings, S.A.	Brazil
Elawan Fotovoltaica Campanario 3, S.L.U.	Spain	Gestamp Eólica Macambira I, S.A.	Brazil
Elawan Fotovoltaica Campanario 4, S.L.U.	Spain	Gestamp Eólica Macambira II, S.A.	Brazil
Elawan Fotovoltaica Campanario 5, S.L.U.	Spain	Eólica Pedra do Reino V, S.A.	Brazil
Elawan Eólica Frontones, S.L.U.	Spain	Lagoa dos Ventos Geradora de Energia, S.A.	Brazil
Elawan Eólica Derramador, S.L.U.	Spain	Deltrade 67 Proprietary Limited	South Africa
Elawan Eólica Fuente Álamo, S.L.U.	Spain	Gestamp Wind Africa (Pty) Ltd.	South Africa
Elawan Fotovoltaica Escuderos 1, S.L.U.	Spain	Modderfontein Wind Energy Project (Pty) Ltd.	South Africa
Elawan Fotovoltaica Escuderos 2, S.L.U.	Spain	Copperton Wind Farm (Pty) Ltd.	South Africa
Elawan Fotovoltaica Escuderos 3, S.L.U.	Spain	Beyçelik Gestamp Yenilenebilir Enerji Uretim, A.S.	Turkey
Elawan Fotovoltaica Escuderos 4, S.L.U.	Spain	Sabas Elektrik Uretim, A.S.	Turkey
Elawan Fotovoltaica Escuderos 5, S.L.U.	Spain	BAK Enerji Üretimi A.Ş.	Turkey
P.E. Monte Becerril, S.L.	Spain	YGT Elektrik Üretim SAN. VE TIC. LTD. ŞTİ.	Turkey
E.F. Manzanares, S.L.U.	Spain	Elawan Energy Ruzgar Enerjisi Limited. (antes Gestamp Ruzgar Enerjisi, Ltd.)	Turkey
E.F. Brazatortas 1, S.L.U.	Spain	Elawan Energy Wallonie, S.A. (antes Gestamp Wallonie, S.A.)	Belgium
E.F. Brazatortas 2, S.L.U.	Spain	Elawan Energy Feluy, S.A. (antes Gestamp Wind Feluy, S.A.)	Belgium
P. E. Miravete, S.L.U.	Spain	Elawan Energy Beaumont, S.A. (antes Gestamp Wind Beaumont, S.A.)	Belgium
E. F. Belinchón 1, S.L.U.	Spain	Elawan Energy Hannut, S.A. (antes Gestamp Wind Hannut, S.A.)	Belgium
E. F. Belinchón 2, S.L.U.	Spain	New Wind S.P.R.L.	Belgium
E. F. Belinchón 3, S.L.U.	Spain	Elawan Energy Salazine, S.A.	Belgium
P. E. Iniesta, S.L.U.	Spain	Elawan Energy Polska sp z o.o (antes Gestamp Eólica Polska sp z o.o.)	Poland
Elawan Energy Tordesillas 1, S.L.U.	Spain	Farma Wiatrowa Szerzawy Sp. z o. o. (antes Gestamp Wind 10 sp zoo)	Poland
Elawan Energy Tordesillas 2, S.L.U.	Spain	Farma Wiatrowa Kleby Sp. zoo	Poland
Elawan Energy Tordesillas 3, S.L.U.	Spain	Farma Wiatrowa Bukówiec Górny Sp. zoo	Poland
Elawan Energy Tordesillas 4, S.L.U.	Spain	Elawan Solar Polska Sp. z o. o. (antes Gestamp Wind 13 sp zoo)	Poland
Elawan Energy Olmedo 1, S.L.U.	Spain	Elawan Wind 14 sp zoo (antes Gestamp Wind 14 sp zoo)	Poland
Elawan Energy Olmedo 2, S.L.U.	Spain	L.L.C. Elawan Power	Russia
Elawan Energy Olmedo 3, S.L.U.	Spain	Elawan Energy France, S.A.S.	France
Elawan Energy Valdecarretas, S.L.U.	Spain	Gournay PV, S.A.S.	France
Elawan Energy Torrijos 220, S.L.U.	Spain	Hidroeléctrica de Tacotan, S.A. de C.V.	Mexico
Gestamp Wind Energy North América, INC.	USA	Hidroeléctrica de Trigomil, S.A. de C.V.	Mexico
Spring Creek Power Partners, L.L.C.	USA	Tacotán Trigomil Servicios SA de CV	Mexico
Nebraska Wind, I, LLC.	USA	Elawan Energy México, S.A. de C.V. (antes Gestamp Eólica México, S.A. de C.V.)	Mexico
Flat Water Holdings, L.L.C.	USA	Eólica Huimilpan, S.A.P.I de C.V.	Mexico
Flat Water Wind Farm, L.L.C.	USA	Elawan Energy Romania S.R.L. (antes Gestamp Eólica Dacia, S.R.L.)	Romania
Flat Water Development Services, L.L.C.	USA	Elawan Wind Berezeni, S.R.L. (antes Gestamp Eólica Berezeni S.R.L.)	Romania
Roth Rock Holdings, L.L.C.	USA	Vientos S.R.L.	Romania



www.elawan.com

