COMPREHENSIVE RESPONSIBLE LOBBYING POLICY AND GOVERNANCE, CONTROL, AND RISK MANAGEMENT FRAMEWORK

Approved by: Governing Board | Responsible for Implementation: Management | Review: Annual

1. Introduction and Purpose

As a leading cooperative and consultancy in energy transition and sustainability, **AIGUASOL** views participation in the public agenda as an ethical responsibility and a key tool to promote sustainable, fair, and innovative energy models. The purpose of this policy is to establish the ethical principles of responsible lobbying, as well as to define a solid framework for governance, internal control, and risk management for all policy advocacy and institutional relations activities.

2. Ethical Principles of Responsible Lobbying

2.1. Positive Social and Environmental Impact

AIGUASOL will exert institutional pressure or influence exclusively to contribute to a direct positive impact on society and the environment, promoting and/or supporting the following:

- Accelerating decarbonization, energy efficiency, and democratizing access to clean energy.
- Developing and deploying regulations and support instruments aimed at social equity and climate change mitigation.
- Expressly renouncing the defense of private interests that slow down the energy transition.

2.2. Foundation in Scientific and Reliable Data

Any regulatory position or proposal promoted by the company will be based on scientific rigor, life cycle analysis, proven technical models, and independent methodologies scientifically validated through real practice.

2.3. Political, Financial, and In-Kind Contributions

AIGUASOL maintains strict partisan neutrality. Any **direct or indirect financial contribution or donation to political parties, candidates, or campaigns is strictly prohibited.** In-kind collaboration is limited to the technical transfer of knowledge in open and public forums.

2.4. Fight Against Corruption and Bribery

A **zero-tolerance** principle against corruption, bribery, and influence peddling is in force. Gifts, gratuities, or favors to public decision-makers are prohibited. All institutional meetings must be formally registered.

2.5. Consistency with Intermediary Organizations

AIGUASOL will ensure that the associations, clusters, and platforms of which it is a member maintain lobbying positions consistent with its climate objectives. In the event of serious misalignments, rectification will be required or formal withdrawal will be processed.

Registry of Intermediary Organizations and Platforms in which AIGUASOL Participates:

Type of Organization	Acronyms	Scope
Sectoral clusters	CEEC	Efficient Energy Cluster of Catalonia
Sectoral clusters	CBC	Bioenergy Cluster of Catalonia
Sectoral clusters	RESCoop	European Federation of Citizen Energy Cooperatives
Consumer Cooperatives	CELB	La Bordeta Energy Community (Barcelona)
Service Cooperatives	BATEC	Cooperative Hub for the Energy Transition
Service Cooperatives	NodeCoop	Cooperative Network of Technical Services and Sustainability

3. Governance, Control, and Risk Management Structure

a) Governing Body and Responsible Executive Position

Responsibility for AIGUASOL's lobbying policy is clearly divided between strategic oversight and operational execution:

- **Governing Body (Governing Board):** This is the highest body responsible for formally reviewing and approving this policy every two years, ensuring its alignment with the cooperative mission.
- **Responsible Executive Position (Management):** This is the executive position responsible for implementation, and ensuring operational compliance with the policy.

b) Implementation and Integration into the Organization

This policy is integrated into AIGUASOL's daily dynamics through the following mechanism:

- **Prior approval of positions:** Any public stance or regulatory submission must be validated by AIGUASOL's Management.

c) Identification, Management, and Control of Non-Compliance Risks

AIGUASOL integrates lobbying risk management into its global control system. The following key risks have been identified and classified:

Risk Category	Risk Description	Control and Mitigation Mechanism
Misalignment risk	Participating in sectoral associations that lobby against the energy transition.	Annual evaluation of intermediary consistency and voting against or deactivation.
Corruption / Ethical risk	Improper giving of gifts or undeclared conflict of interest in meetings.	Total ban on gifts, mandatory registration of meetings and incompatibilities.
Reputational risk / Rigor	Promoting regulatory proposals without the support of truthful technical data.	Prior validation by the Governing Board of verified and independent data.

d) Evaluation of Governance Framework Compliance

The effectiveness of the governance and control framework is evaluated through:

- **Annual policy review:** Annual review by the Governing Board coinciding with the strategic planning of AIGUASOL's General Assembly of members.

e) Channel for Expressing Concerns and Complaints (PSG3 Reference)

AIGUASOL provides its stakeholders (employees, members, public entities, clients, and citizens) with an open channel to raise doubts, concerns, or complaints regarding inappropriate lobbying practices or breaches of this policy.

Operational registration procedure and complaints channel: Any concern, complaint, or inquiry regarding the company's lobbying conduct will be submitted and managed via the email address: info@aiguasol.coop.

In witness whereof, Neus Agost Gil, in her capacity as President of Aiguasol Consulting SCCL, with Tax ID (NIF) F62787692, signs this document:

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