

SUSTAINABILITY POLICY

QUEKA RP, SGEIC, SA



Q U E K A

R E A L P A R T N E R S

Approval		Review and Update	
Responsible Body	Date	Version	Revision
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1. INTRODUCTION

Queka RP, SGEIC, SA (hereinafter, "Queka" or the "Company") sets forth in this Sustainability Policy (hereinafter, the "Policy") the established principles that the Company pursues to be a sustainable entity, in accordance with the purpose and values contained in this policy. The Company believes that sustainability offers opportunities to increase positive impacts in the social, environmental, and governance (ESG) spheres.

This Policy establishes the positioning from the perspective of strategy and general objectives, business management and operations, and the design and marketing of financial products and services in accordance with ESG criteria.

The Company is authorized to carry out activities, according to article 42 of Law 22/2014, of November 12, which regulates Private Equity entities, other closed-type collective investment entities and management companies of closed-type collective investment entities, and which modifies Law 35/2003, of November 4, on Collective Investment Institutions.

Queka manages Private Equity Entities ("PEE") and Alternative Investment Funds ("AIF") established in the European Union.

PEEs can take the legal form of Private Equity Companies ("PECs") or Private Equity Funds ("PEFs").

On the other hand, AIFs are entities similar to PEEs or Closed-End Collective Investment Undertakings ("CECIUs"), European Private Equity Funds ("EPEFs"), European Social Entrepreneurship Funds ("ESEFs"), or European Long-Term Investment Funds ("ELTIFs").

Hereinafter, PEEs and AIFs shall be referred to interchangeably as "Managed Vehicles".

2. SCOPE OF APPLICATION

This Policy is corporate in nature and applies to all employees and directors of the Company, who must be aware of, understand, and comply with this Policy, its action plans, and associated activities.

This Policy will be published in a specific repository, accessible to all employees, which will allow the regulations in force at any given time to be maintained in an organized and understandable way.

3. LEGAL REGULATION

- Law 22/2014, of November 12, regulating Private Equity entities, other closed-type collective investment entities and management companies of closed-type collective investment entities, and amending Law 35/2003, of November 4, on Collective Investment Institutions.
- COMMISSION DELEGATED REGULATION (EU) No 231/2013 of 19 December 2012 supplementing Directive 2011/61/EU of the European Parliament and of the Council with regard to exemptions, general conditions for carrying on business, depositaries, leverage, transparency and supervision.
- Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability disclosure in the financial services sector.
- Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on alternative investment fund managers.

4. APPROVAL AND DISSEMINATION

The Policy is subject to approval by Queka's Board of Directors, upon the proposal of the Compliance Unit. The Board of Directors is also responsible for establishing the necessary control procedures to ensure compliance, with the Compliance Unit itself overseeing the application of these controls.

The Company may modify this Policy when it deems necessary. In particular, such modifications may be motivated by the following circumstances:

- If circumstances arise that could significantly affect compliance with applicable regulations or if regulatory changes occur;

- If there are changes in the company's operations and structure, as well as recommendations from internal and external auditors; and
- If required by the CNMV or any other competent authority.

Any substantial modification of this Policy will be subject to approval by the Board of Directors, at the proposal of the Regulatory Compliance Unit, understanding as substantial those that imply a relevant variation or impact on the Company.

However, the Compliance Unit may introduce non-substantial modifications to this Policy, without prejudice to informing the Board of Directors if it deems it appropriate.

In any case, the Policy will be reviewed at least once a year to ensure that it complies with the provisions established by the Company, both at a strategic and operational level, the regulations in force at any given time, and the requirements or recommendations issued by regulatory bodies or any other competent authority.

5. PURPOSE AND VALUES

The purpose of the Company is to promote economic and social development within its sphere of activity, with full respect for the environment, considering the needs and expectations of the different interest groups.

To achieve this purpose, the Company adheres to the same fundamental values that govern all its activities and that are also adapted to this area:

- **Experience:** Queka has a team of highly experienced professionals, giving it a deep understanding of the market in which it operates. This knowledge allows it to identify potential opportunities and risks, including in the area of sustainability, to facilitate decision-making that promotes its sustainability goals.
- **Transparency:** The Company will clearly communicate and implement its sustainability strategy, striving to make its results in this area visible.
- **Commitment:** Queka is committed to working closely with and for its stakeholders on sustainability, using its experience, resources and

knowledge to understand their needs in this area and design strategies that contribute to their social, environmental and governance objectives.

- Service: The Company understands its responsibility in matters of sustainability as an essential part of the service it provides to its stakeholders.

6. SUSTAINABILITY GOALS IN SOCIETY

Queka's main sustainability objectives are as follows:

- Reduction of carbon footprint: The Company will promote internal behaviors aimed at reducing its carbon footprint, implementing more sustainable practices in its operations and promoting energy efficiency in general.
- Financial education: The Entity will strive to promote financial education among its employees, helping them to make informed, responsible and sustainable economic and financial decisions.
- Transparency and responsible governance: The Company will establish good business and governance practices, ensuring that its decisions are aligned with the principles of sustainability and social responsibility, on the one hand, and independence and diversity, on the other.

7. GENERAL PRINCIPLES

The Company's sustainability strategy, taking into account the values mentioned above, will be developed in accordance with the application of the following principles:

- Relationship with stakeholders: the Company's strategy will be based on establishing a balanced, transparent and clear relationship with stakeholders, primarily customers, employees and suppliers, seeking to operate within the framework of sustainability.
- People management: Queka will promote a management of the people who make up the staff that fosters their well-being and motivation through measures of reconciliation, personal and professional development, safety, training and health, promoting the inclusion and diversity of the human team.

- Supplier relations: Queka will promote responsible and sustainable supply chain management, fostering a mutual positive influence to improve the ethical, social and environmental performance of its suppliers.
- Respect for the environment: the Company's strategy will seek to be positive regarding the global challenge posed by climate change, involving its main stakeholders in the establishment of principles and habits focused on its mitigation in the areas of business.
- Promoting the integration of both environmental and climate risks and governance risks into the strategic and business processes of the Company, favoring the financing of projects that contribute to the improvement of society and the environment.
- Consistency in the management of ESG factors will govern the Company's actions in order to provide an adequate response to compliance with the commitments undertaken, the applicable regulations and supervisory expectations.
- The Company will observe the principle of transparency in the definition, disclosure and application of the strategies, policies and procedures relating to the integration of sustainability factors into the corporate strategy.
- The Company will develop the management of ESG factors in the business field according to a line of action based on proportionality, based on the nature of the Company's main activity, the relevance of the assets, and the complexity of the modifications or adaptations to be made in its infrastructure and in its policies and procedures.

8. SPECIFIC COMMITMENTS TO STAKEHOLDERS

To that effect, and in line with the Company's Internal Code of Conduct, certain specific practices of general scope, and others in relation to the various stakeholder groups, are highlighted, which will be observed continuously:

a. Human rights

To respect, in the development of relationships with its employees, customers, shareholders and investors and suppliers, as well as with society as a whole, human rights, as a shared ideal at a global level, in accordance with the International Bill of Human Rights and other universally accepted principles.



To promote its own initiatives, through its plans and actions and collective efforts, establishing strategic alliances for the achievement of the Sustainable Development Goals.

b. Clients

To provide clients with clear and truthful information about the financial products and services offered throughout the entire cycle (pre-contractual information, contract formalization, and execution). To inform clients about the existence or ESG consideration of the products offered by the Company and to seek their input if any products are offered that cannot be considered sustainable.

To exercise the freedom of commercial communication responsibly as a means to ensure respect for consumer rights and free and fair competition.

Develop responsible communication practices that prevent information manipulation and protect integrity and honor.

Follow best practices in information security, cybersecurity, protection and confidentiality of personal data.

Implement quality and accessibility management systems aligned with the strategic objective of customer focus.

Maintain a Customer Service Department available to all customers of the Company, facilitating contact and accessibility to the Company by customers in all cases.

c. Employees

Interpret and apply labor regulations in accordance with the most advanced international standards approved by the United Nations and the European Union in this matter.

Apply the principles of equal treatment, equal opportunities, non-discrimination and respect for diversity, in defense of the dignity, individual freedom and fundamental rights of workers.

Prioritize human capital management in a safe, sustainable, and healthy environment that fosters and enhances teamwork skills.

Promote professional development through training and career plans for staff, as well as work-life balance.

Attracting and retaining talent.

d. Diversity and inclusion.

Follow a people and talent management strategy that guarantees a favorable framework of labor relations based on equal opportunities and non-discrimination for reasons of gender, race, ethnic or social origin, language, religion or belief, political opinion, heritage, disability, age, sexual orientation, etc.

Having professionals with diverse profiles, within the framework of established decision-making processes and procedures, with the conviction that this contributes to creating differentiated approaches and greater value for society.

e. Corporate and internal governance

Develop good corporate and internal governance practices that ensure a relationship framework based on transparency and trust.

f. Shareholders and investors

To consistently practice transparency in the information provided to shareholders, investors, and the markets in general.

To protect the legitimate interests of shareholders and investors by keeping up-to-date information about the Company available to them, in accordance with applicable regulations.

To ensure strict compliance with the provisions of the applicable regulations on market abuse.

g. Environment

Define specific actions that demonstrate the Company's commitment to the environment and energy saving, as well as its stance on climate change.

Promote initiatives and actions aimed at protecting and conserving the environment, or social development, minimizing the direct environmental impact of their activity, and promoting information and training in this culture.

Promote the financing of projects that contribute to improving energy efficiency and achieving greater long-term environmental sustainability, as well as integrating environmental risks into the risk analysis of financing and investment projects.

To promote a responsible attitude towards the environment among the staff and society in general, through the application of good practices in recycling, energy consumption and responsible spending.

h. Suppliers

Establish transparent, objective and impartial processes with suppliers, fostering competition and equal opportunities.

Properly manage the delegation of service provision to third parties, both in the prior stage of analysis and approval of the delegation and in its subsequent formalization, development and monitoring.

Strictly adhere to payment deadlines, as well as the conditions agreed contractually with suppliers.

Use local suppliers within the company's area of operation, whenever possible.

i. Prevention of corruption and other illegal conduct.

Maintain the commitment to establish a culture of regulatory compliance that allows for the development of honest and ethical professional conduct.

Maintain an Ethics Channel available to all employees, directors and administrators of the Company, as well as to third parties outside the organization other than the above.

Reject the practices of economic crime, fraud and violation of consumer rights.

To fight against corruption, extortion and bribery, in all its forms, by applying the highest standards of compliance in this regard.

To condemn the commission of any illegal act within the Company, particularly criminal offences, recognizing that no actual or perceived benefit to the Company can justify such behaviour.

Establish and maintain a Criminal Risk Prevention Plan that allows the highest degree of control in this area.