

STAKEHOLDER DISCLOSURE PLAN

Preliminary Assessment Report – Hydropower Sustainability Standard (HS)

Cuerquia Hydropower Plant – 68 MW

San Andrés de Cuerquia, Antioquia (Colombia)

Cuerquia SPV S.A.S E.S.P

October 2026

1. OBJECTIVE

Stakeholder engagement is a continuous and dynamic process through which relationships of trust are built with the surrounding environment. This plan is the consultation tool that guides the project's disclosure actions and sets out the guidelines for delivering clear messages about the Hydropower Sustainability Standard to the communities in the area of influence.

Specifically, for the public consultation phase of the assessment of the HPP Cuerquia project against the Hydropower Sustainability Standard, this plan defines the disclosure period, the channels and formats for publishing the Preliminary Assessment Report, the stakeholders to be notified, the mechanisms enabled to receive comments, and the timeframes for collecting those comments and forwarding them to the HSA assessment team.

2. SCOPE

This procedure shall be applied by the Social Management team responsible for the activities and initiatives that ensure the continued well-being of all stakeholders, as required to support the implementation of the disclosure plan. The process begins with the preparation of the disclosure materials and ends with the submission of all comments and their responses to the HSA assessment team, in accordance with the schedule in section 11.

For the public consultation phase, the scope of this plan covers the period from October 1 to November 30, 2026 (60 calendar days) and the area of influence of the HPP Cuerquia project in the municipality of San Andrés de Cuerquia (Antioquia), as well as the municipal, regional and national institutional, industry-association and civil society stakeholders listed in Annex 1.

3. RESPONSIBILITIES

The Social team is responsible for preparing and applying this procedure. The Social and Environmental Management Department shall monitor compliance with it.

However, full implementation of the procedure requires the involvement of different actors, who advise, support and, in some cases, carry out specific stages of the procedure. The responsibilities of the main actors involved in the activities of the communications plan procedure are described below:

Social and Environmental Manager: Responsible for providing guidelines and making final decisions related to the implementation of the disclosure plan.

Social Coordinator: Responsible for providing guidelines, supporting and monitoring the implementation of the disclosure plan.

Social Supervisor: Responsible for implementing and following up on the disclosure plan, both in the office and in the field.

Sustainability Coordinator: Coordinates and verifies the dissemination of content through all established corporate channels to ensure the maximum reach of the disclosure plan.

4. REFERENCE DOCUMENTS

- ✓ ESG Policy – Energo-Pro
- ✓ Sustainability Policy – Energo-Pro.
- ✓ Hydropower Sustainability Standard – Hydropower Sustainability Council
- ✓ Preliminary Assessment Report for the HPP Cuerquia project – HS Standard.
- ✓ Hydropower Sustainability Assurance System (HSAS) – Hydropower Sustainability Council.
- ✓ Hydropower Sustainability Guidelines on Good International Industry Practice (HGIIP).
- ✓ Environmental Impact Study (EIA) – Cuerquia Hydropower Plant, Consultora Endémica S.A.S.
- ✓ Report Disclosure Plan – Bakun HEP, Sarawak Energy (methodological reference document).

5. GLOSSARY

AREAS OF INFLUENCE (AI): The project's area of influence (AI) comprises the territory likely to be affected by the activities inherent to the project and its interaction with the physical-biotic and socioeconomic systems. The AI consists of at least two levels: the regional context (Indirect Area of Influence, AII) and the local context (Direct Area of Influence, AID).

INDIRECT AREA OF INFLUENCE (AII): Area where the impacts extend beyond the physical footprint of the project and its associated infrastructure; that is, the zone outside the direct area of influence, extending as far as such impacts are manifested.

DIRECT AREA OF INFLUENCE (AID): The project's direct area of influence is the area where the impacts generated by construction and operation activities are manifested; it is related to the project site and its associated infrastructure.

STAKEHOLDERS: Individuals, groups or organizations of any kind that may be affected by the organization's actions, or whose interests and/or requirements may potentially affect its ability to operate, such as communities, opinion leaders (media), Government, Local Authorities, employees, contractors, partners and investors, industry companies, NGOs, suppliers, trade unions, oversight and control bodies, and the general public.

CERTIFICATION: A comprehensive assessment of hydropower projects against the Standard, in order to receive an HS certification rating approved by the HS Council. The certification methodology is governed by the agreed procedures described in the Hydropower Sustainability Assurance System (HSA).

HS STANDARD: The global Standard for sustainable hydropower development, which sets out the criteria that must be met for a hydropower project or operating facility to obtain certification.

HGIIP: The Hydropower Sustainability Guidelines on Good International Industry Practice, a guidance document on the processes and outcomes that constitute good international industry practice in accordance with the HS Standard.

PRELIMINARY ASSESSMENT REPORT (IEP): Document prepared by the accredited assessor setting out the results of the project assessment against the topics of the HS Standard, which must be published for public consultation as a prerequisite for certification.

PUBLIC CONSULTATION: Phase of the certification process during which the Preliminary Assessment Report is made available to the public for a defined period, so that communities, authorities and any interested party can submit comments and observations.

HSA ASSESSMENT TEAM: Assessors accredited under the Hydropower Sustainability Assurance System, responsible for assessing the project against the HS Standard, receiving the comments arising from the public consultation and considering them in the final report.

COMMENT FORM: Physical and digital instrument provided by Cuerquia SPV S.A.S E.S.P for stakeholders to record their observations on the Preliminary Assessment Report during the consultation period.

PROJECT-AFFECTED COMMUNITIES: Population settled in the territorial units of the HPP Cuerquia project's area of influence that is subject to the direct and indirect impacts of the construction and operation phases.

6. ABBREVIATIONS AND ACRONYMS

ACRONYM	MEANING
AI / AID / AII	Area of Influence / Direct Area of Influence / Indirect Area of Influence
CORANTIOQUIA	Regional Autonomous Corporation of Central Antioquia
EIA	Environmental Impact Assessment
HGIIP	Hydropower Sustainability Guidelines on Good International Industry Practice
HS	Hydropower Sustainability
HSA	Hydropower Sustainability Assurance
HSAS	Hydropower Sustainability Standard Assurance System
ICANH	Colombian Institute of Anthropology and History
IEP	Preliminary Assessment Report
MADS	Ministry of Environment and Sustainable Development
PQRS	Petitions, Complaints, Claims and Suggestions
SPV	Special Purpose Vehicle (Cuerquia SPV S.A.S E.S.P)
UPME	Mining and Energy Planning Unit

7. GENERAL INFORMATION

The Cuerquia Hydropower Plant project (hereinafter “HPP Cuerquia”) is being developed by Cuerquia SPV S.A.S E.S.P, the project sponsor and owner, responsible for the design, construction and operation of the infrastructure. The company is backed by Energo-Pro Colombia S.A.S, which contributes its experience in the technical, environmental, social, land, financial and legal structuring of the project.

The project consists of the construction and operation of a 68 MW hydropower plant that will be integrated into the Colombian Electricity System, in line with the National Energy Plan and its objectives of decentralizing and decarbonizing the country's energy production.

HPP Cuerquia is located in the municipality of San Andrés de Cuerquia, in the northern part of the department of Antioquia, on the eastern slope of the Central Cordillera, on land within the San Andrés River watershed, which covers part of the municipalities of Santa Rosa de Osos, San José de la Montaña and San Andrés de Cuerquia.

The project's final area of influence comprises the rural districts (veredas) and territorial units of San Antonio, Montaña Adentro, Sector San Rafael, Atezal, Sector Loma del Indio, Alto Seco, Loma Grande, El Roble, Sector La Vega, Cañaduzales, El Barro, La Chorrera and Cruces, as well as the Urban Center of San Andrés de Cuerquia. These territorial units are the priority scope of disclosure for this plan.

The project's Environmental Impact Study (EIA) was prepared by Consultora Endémica S.A.S in accordance with the terms of reference issued by Corantioquia, the competent environmental authority, and the General Methodology for the Submission of Environmental Studies adopted by the Ministry of Environment and Sustainable Development through Resolution 1402 of 2018.

In parallel with the environmental permitting process before Corantioquia, Cuerquia SPV S.A.S E.S.P is conducting the assessment of the project against the Hydropower Sustainability Standard, with a view to obtaining the corresponding certification. The following section details the disclosure plan for the public consultation phase of that assessment.

8. DISCLOSURE OF THE PRELIMINARY ASSESSMENT REPORT – PUBLIC CONSULTATION PHASE

One of the prerequisites for Hydropower Sustainability certification, in accordance with the Hydropower Sustainability Assurance System, is the publication of the Preliminary Assessment Report (hereinafter “the Report”) for public consultation.

This phase will run for a period of 60 calendar days, opening on October 1, 2026 and closing on November 30, 2026.

To ensure that the communities in the area of influence, key stakeholders and any interested party have access to the document and can submit their comments and observations, Cuerquia SPV S.A.S E.S.P provides the following mechanisms:

- ✓ The Report will be published in Spanish and English on the official websites. Printed copies in Spanish will be made available in the territorial units of the area of influence,

together with an executive summary in plain, non-technical language, given that Spanish is the language of all stakeholders in the area of influence.

- ✓ The Report and its summary will be published in Spanish and English on the corporate website through a dedicated microsite linking to the corresponding page of the Hydropower Sustainability Council website and to the online comment form.
- ✓ A public disclosure notification will be sent to the stakeholders listed in Annex 1 by filed official letter, email, telephone and WhatsApp messaging, according to the appropriate channel for each stakeholder.
- ✓ Printed copies in Spanish of the Report, the executive summary and the comment form will be made available at strategic locations: the HPP Cuerquia project office, the San Andrés de Cuerquia Mayor's Office, the Asocomunal office, the community halls of the rural districts in the area of influence and the rural schools. A sealed box for depositing comments will be installed at each location.
- ✓ Notice boards with a QR code linking to the Report and the online comment form will be installed in each territorial unit of the area of influence.
- ✓ Printed copies will be hand-delivered to the Mayor of San Andrés de Cuerquia, the Municipal Council and Corantioquia, with acknowledgment of receipt.
- ✓ In-person information sessions and door-to-door visits will be held in the territorial units of the area of influence to explain the content of the Report and the mechanism for submitting comments.

Annex 1 lists the identified stakeholders and the proposed communication, distribution and feedback mechanism for each.

8.1 Receipt of comments

Stakeholders may submit their comments and observations on the Report through any of the following means: (i) the online form available on the microsite and via the QR code; (ii) the printed form deposited in the boxes provided in the area of influence; (iii) the institutional email address set up for the consultation; (iv) telephone line and WhatsApp messaging; (v) direct recording during the in-person information sessions. All means will be available throughout the entire consultation period. The available service channels are:

- ✓ Email: pqr@energo-pro.com
- ✓ Mobile phone and WhatsApp: +57 311 729 4631

8.2 Collection and submission of comments

Comments deposited in the boxes will be collected by the field social team at two points: 30 days after the start of the consultation (October 31, 2026) and at the close of the period, after 60 days (November 30, 2026). Minutes, including photographic records and a consolidated summary of the comments received, will be drawn up at each collection. All comments, both physical and digital, will be forwarded to the HSA assessment team for processing.

8.3 Reminders during the consultation period

During the public disclosure period, reminders about the availability of the Report will be issued every 30 days to ensure that stakeholders are aware of the document and can submit their comments within the deadline. Reminders will be disseminated through the same

channels used for the initial notification and through the notice boards installed in the territorial units.

8.4 Process records and evidence

The social team will document each disclosure activity through minutes, attendance records, filing receipts, and photographic and video records. This evidence is kept in the project file and forwarded to the HSA assessment team as support for compliance with the public consultation requirement.

9. ACTION PLAN

This section sets out the guide for carrying out activities with stakeholders, with the aim of fostering assertive and transparent communication, grounded in respect for the customs and way of life of the communities in the project's area of influence.

Parameters defined for information disclosure

PARAMETER	COMMITMENT
Clear and reliable information	Direct information, in line with the stakeholder matrix (community leaders, Municipal Development Secretariat and representatives of the associations present in the area). Plain, non-technical language. The team of professionals builds relationships based on trust, respect and humane treatment.
Objective information	Share accurate information: schedule of activities and flowchart for hiring personnel.
Timely communication	Provide information in a timely manner to avoid creating expectations; clarify misconceptions about the project's development; communicate clearly and promptly the technical, environmental, economic and social risks present at each stage.
Bilateral agreements	Reduce conflicts arising from expectations regarding the project's negative and positive impacts, and ensure that the community understands the project in its different phases.

10. MANAGEMENT OF AND RESPONSE TO STAKEHOLDER COMMENTS

Receiving comments does not end with their collection: each observation received during the public consultation is recorded, classified, answered and forwarded to the HSA assessment team. This section defines the available receipt points and the handling route that each comment follows until it is closed.

10.1 Available receipt points

Stakeholder group	Means of communication	Comment receipt period
Rural communities in the project's area of influence	Boxes in the community halls and schools of the rural districts of San Antonio, Montaña Adentro, Sector San Rafael, Atezal, Sector Loma del Indio, Alto Seco, Loma Grande, El Roble, Sector La Vega, Cañaduzales, El Barro, La Chorrera and Cruces.	Oct 1 – Nov 30, 2026
Urban center community of San Andrés de Cuerquia	Box at the Asocomunal service office and at the social development office of the San Andrés de Cuerquia Mayor's Office.	Oct 1 – Nov 30, 2026
Project employees and contractors	Comment box at the HPP Cuerquia project office and in the dining halls set up by each contractor.	Oct 1 – Nov 30, 2026
Public administration of San Andrés de Cuerquia (Mayor's Office and Municipal Council)	Box at the Municipal Mayor's Office and delivery of a printed copy with acknowledgment of receipt.	Oct 1 – Nov 30, 2026
Environmental authority and regional stakeholders	Submission of the Report and the comment form to Corantioquia by filed official letter and email, with a link to the microsite.	Oct 1 – Nov 30, 2026

10.2 Handling and response route

STAGE	ACTION	RESPONSIBLE	DEADLINE
1. Receipt	The comment is received via sealed box, online form, email pqr@energo-pro.com, telephone line or WhatsApp +57 311 729 4631, or recorded during an information session.	Social Supervisor	Ongoing throughout the 60 days
2. Recording and consolidation	Boxes are opened with minutes and photographic records; each comment is numbered and entered into the consolidated comment matrix, indicating date, stakeholder, territorial unit and source channel.	Social Supervisor	Oct 31 and Nov 30, 2026
3. Classification	Comments are classified by HS Standard topic and by type (petition, complaint, claim or suggestion), in accordance with the project's PQRS Handling Protocol.	Social Coordinator	5 business days from recording
4. Response to the commenter	A response is issued through the same channel through which the comment was received. Responses of collective interest are also published on notice boards and on the microsite.	Social Coordinator	15 business days from classification
5. Submission to the assessment team	The consolidated matrix, with the comments and the responses issued, is forwarded to the HSA assessment team with proof of submission.	Social and Environmental Manager	Within 10 days after each collection

STAGE	ACTION	RESPONSIBLE	DEADLINE
6. Progress updates	Stakeholders are informed of the status of the comments and the progress of the environmental and social management programs, at a frequency proportional to the magnitude of the concerns received.	Sustainability Coordinator	Every 30 days during the consultation

11. PUBLIC CONSULTATION IMPLEMENTATION SCHEDULE

The following schedule details the milestones of the public consultation phase for the Preliminary Assessment Report, with the party responsible and the evidence generated by each. The dates of the information sessions in each territorial unit will be confirmed with the Community Action Boards (Juntas de Acción Comunal, JAC) and communicated at least eight days in advance.

DATE	MILESTONE	RESPONSIBLE	EVIDENCE
Sep 25 – 30, 2026	Preparation: printing of the Report, the executive summary and the comment forms; setup of the microsite and the online form; preparation of boxes and notice boards.	Social Coordinator	Preparation minutes; inventory of printed materials and boxes
Oct 1, 2026	Opening of the public consultation: publication of the Report and the summary on the corporate microsite, with a link to the HS Council website and the online form.	Sustainability Coordinator	Screenshot of the microsite
Oct 1 – 3, 2026	Notification of the disclosure to the stakeholders listed in Annex 1, by filed official letter, email, telephone and WhatsApp.	Social Supervisor	Filing and dispatch receipts
Oct 2, 2026	Hand delivery of printed copies to the San Andrés de Cuerquia Mayor's Office, the Municipal Council and Corantioquia.	Social and Environmental Manager	Acknowledgments of receipt
Oct 5 – 9, 2026	Installation of sealed boxes and notice boards with QR codes in the thirteen territorial units of the area of influence and in the urban center.	Social Supervisor	Photographic record for each installation point
Oct 13 – 24, 2026	First round of in-person information sessions and door-to-door visits in the area of influence.	Social Supervisor	Attendance records, minutes and session reports
Oct 31, 2026	30-day reminder through the notification channels and notice boards; first collection of boxes and consolidation of comments.	Social Supervisor	Box-opening minutes; consolidated comment matrix
By Nov 10, 2026	Submission of the first consolidated set of comments to the HSA assessment team.	Social and Environmental Manager	Proof of submission
Nov 10 – 21, 2026	Second round of information sessions and issuance of responses to the comments received in the first collection.	Social Coordinator	Response communications; publication of collective responses

DATE	MILESTONE	RESPONSIBLE	EVIDENCE
Nov 30, 2026	Close of the public consultation: second collection of boxes and final consolidation of comments.	Social Supervisor	Closing minutes; final comment matrix
By Dec 10, 2026	Final submission of comments and responses to the HSA assessment team; closure of the consultation file.	Social and Environmental Manager	Proof of submission; consolidated documentary file

ANNEX 1. Identified stakeholders and disclosure mechanism

The following matrix lists the stakeholders identified for the HPP Cuerquia project and the planned mechanism for communicating, distributing and receiving feedback on the Preliminary Assessment Report during the public consultation period (October 1 – November 30, 2026).

Entity / Organization	Communication strategy	Distribution method	Feedback strategy
COMMUNITIES IN THE AREA OF INFLUENCE			
JAC – San Antonio rural district	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
JAC – Montaña Adentro rural district	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
Sector San Rafael	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
Atezal rural district	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
Sector Loma del Indio	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
Alto Seco rural district	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
Loma Grande rural district	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
El Roble rural district and Sector La Vega	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
Cañaduzales rural district	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Sealed box and recording during information session.
El Barro rural district	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
La Chorrera rural district	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
Cruces rural district	Invitation to the JAC via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
Urban center community of San Andrés de Cuerquia	Invitation via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
Asocomunal San Andrés de Cuerquia	Invitation to Asocomunal via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Sealed box at Asocomunal; recording during information session
Women's, youth and senior citizens' organizations in the AI	Invitation via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
MUNICIPAL ADMINISTRATION			

Entity / Organization	Communication strategy	Distribution method	Feedback strategy
San Andrés de Cuerquia Mayor's Office	Invitation via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Sealed box at the Mayor's Office; recording during information session.
San Andrés de Cuerquia Municipal Council	Invitation via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
Planning Secretariat and Social Development Secretariat	Invitation via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
Municipal Ombudsman's Office (Personería Municipal)	Invitation via WhatsApp; in-person information session.	Printed copy of the Report and link to consult it on the website	Recording during information session.
ENVIRONMENTAL AUTHORITIES AND REGIONAL AND NATIONAL ENTITIES			
Corantioquia	Filed official letter; email	Link to the Report	Online form
Antioquia Governor's Office – Secretariat of Environment and Sustainability	Official letter; email	Link to the Report	Online form
Ministry of Environment and Sustainable Development (MADS)	Institutional email	Link to the Report	Online form
Mining and Energy Planning Unit (UPME)	Institutional email	Link to the Report	Online form
PARTNERS, CONTRACTORS AND EMPLOYEES			
Energopro Colombia S.A.S	Internal communication; email	Link to the Report and the microsite	Online form
Contractors	Internal communication; email	Link to the Report and the microsite	Online form
HPP Cuerquia project employees	Internal communication; email	Link to the Report and the microsite	Online form
OTHER STAKEHOLDERS			
NGOs, civil society, media, academia and the general public	Publication on the IHA and Energopro websites	Link to the Report and the microsite	Online form