

GREENERGY

Index

1 Objective

2 Scope

3 Our values and principles

We act right

We respect people

We build trust

We protect our company

We lead by example

4 Our way of acting

With people

In the markets

5 How we report

6 How we respond

1 | Objective

The objective of this Code of Conduct is to establish the principles and values that should inspire and govern the development of the activities and relationships maintained in **GREENERGY**, as well as the conduct of each of the employees, managers and administrators.

2 | Scope

This Code of Conduct is binding and mandatory for all employees, collaborators, managers, directors, administrators and members at all levels of **GREENERGY**.

It is the responsibility of everyone, regardless of their function within the organization, to ensure that this Code of Conduct is respected and complied with. In no case will any non-compliance with it be tolerated; therefore, any action that directly or indirectly goes against the provisions must be reported in the manner provided for in this document.



3 | Our values and principles

3.1 We act correctly

We comply with the applicable laws in the countries in which we operate.

We must know and comply with the laws and regulations in force in our daily work. These laws and regulations may vary from country to country. If we are unsure or have questions, we consult Legal & Compliance.

Legal violations and breaches of our Code of Conduct can have serious consequences for our company and for us.

THESE CONSEQUENCES MAY INCLUDE:



Fines and damages for our company



Exclusion from public and private tenders



Damage to **GREENERGY's** reputation, brand and market value.



Disciplinary actions



Significant fines and liquidated damages



Imprisonment

3.2 We respect people

We respect the dignity, privacy and personal rights of each individual.

We believe that diversity enriches our work environment. We work together without differences of ethnic origin, culture, beliefs, age, disability, skin color, gender, sexual orientation or ideology. We seek to develop the talents of our employees.

We do not tolerate discrimination, sexual or any other type of harassment, or any inappropriate behavior toward individuals or groups. We apply these principles of respect to each other and to the external parties with whom we interact, including our suppliers, customers and business partners.

If we identify a potential breach of the Code of Conduct, we do not ignore it, even if it does not affect us personally. The company provides several channels for reporting possible breaches of the Code of Conduct ("Our reporting channels"). In many cases, timely reporting is crucial to avoid or minimize negative consequences for the company.



3.3 We build trust

We are transparent and honest. We take our responsibility seriously, and only promise what we can deliver. We are sincere. We help to clarify and eliminate possible deficiencies, problems and misunderstandings.

We do everything possible to satisfy the trust placed in us by our customers.

What do we do when we make a mistake? Everyone makes mistakes at work. We foster a culture where we learn from our mistakes. We confront them openly to prevent them from happening again. This is the only way to learn from them and avoid making them again. While some mistakes are not serious, others could have serious consequences and must be reported.

When we make decisions on behalf of **GREENERGY**, we ask ourselves the following questions:

- | | |
|---|--|
| 1 | Is it right for GREENERGY , and is it in line with our culture, principles, values, and sustainable, economic and social commitments? |
| 2 | Is it legal? |
| 3 | Could it affect our brand if our decision is covered in the media? |
| 4 | What would the people we care about think of our decision? |
| 5 | Are we willing to take responsibility for our decision? |

If you have any doubts about the above answers, ask Legal & Compliance for advice.



3.4 We protect our company

We protect and promote **GREENERGY**'s reputation and values. These are essential to the success of our business and ensure the sustainable future of our company. If we act illegally or inappropriately, we could cause considerable damage to our company.

As **GREENERGY** employees aim to serve the interests of our company, we act at all times, above and beyond other considerations, in accordance with ethics, honesty and professionalism, always with an eye to the alternative that is in the best interest of **GREENERGY** and its customers.

We always act "as if it were our own company". This underlines our responsible and forward-looking attitude, which guide our actions.

3.5 We lead by example

As decision-makers, we have a special duty. Our leaders lead by example and set an appropriate "tone from the top" with which we define the way we manage our leadership and our commitment to honesty and ethics. We establish a work environment in accordance with our values.

As responsible people, we take seriously our obligations to care for the employees entrusted to us.

We create a safe working environment and are available to clarify with our employees any professional or personal questions or concerns.

We set a good example and ensure that our teams understand the importance of acting in line with our Code of Conduct.

We take seriously any indications of possible non-compliance and notify Compliance.

We safeguard the identity of employees who report possible misconduct and protect them from retaliation or other negative effects.

We comply with our organizational and supervisory obligations.

What are the organizational and supervisory duties?

Duty to select: We carefully select our teams based on their skills and their professional and personal qualities.

Duty to give instructions: We define binding tasks precisely and completely, especially with regard to compliance with legal requirements.

Duty to control: We ensure that compliance with legal provisions is constantly monitored.

Duty to communicate: In our daily business, we clearly communicate the importance of responsible business conduct, compliance with legal requirements, and the consequences of our misconduct.

GREENERGY

4 | Our way of acting

4.1 With people

At **GREENERGY**, we protect the fundamental rights of employees, as well as their personal and occupational health and safety, both in our offices around the world and during business travel.

We create and maintain a working and collaborative environment in which people feel respected and free to express their opinions, promoting fairness and equity.

We are aware of the importance of the integral development of each person, so we ensure that all employees and collaborators can enjoy their personal and family life equally.

We promote reconciliation policies that facilitate the balance between both spheres.

At **GREENERGY**, we guarantee equal opportunities and fair treatment for all people, regardless of skin color, ethnic or social origin, beliefs, age, disability, sexual identity or gender. We abide by the laws of each country in which we operate and do not tolerate discrimination, sexual harassment, or inappropriate behavior toward individuals or groups.

We are committed to implementing and disseminating the necessary measures to prevent, avoid and combat situations of harassment and sexual harassment in the workplace.

We act with the utmost respect for labor rights, including freedom of association, affiliation and the effective right to collective bargaining, prohibiting any form of forced labor.

At **GREENERGY**, taking care of our health and well-being is a priority. We are protected against occupational hazards and we have resources to help us stay physically and mentally balanced.

We contribute to this ourselves:

We respect safety rules in our workplace.

We avoid risky behavior.

We take the necessary actions when we recognize dangerous situations.

The company strives to provide us with a safe working environment so that everyone can finish their workday and return home safe and sound.

We act responsibly and conscientiously, avoiding putting our own safety or that of our colleagues at risk through imprudent behavior or by ignoring the rules established in terms of prevention.

We react quickly in a critical situation and follow the relevant safety instructions.

We report occupational safety incidents immediately to our manager.

4.2 In the markets

Anti-corruption

We reject all forms of corruption and bribery. We do not tolerate any form of corruption in our business dealings anywhere in the world.

This includes business transactions through our external partners or intermediaries. We do not engage, either actively or passively, in any form of corrupt behavior. We report any suspected corrupt activity to Compliance.

Gifts and hospitality must:

- Be aligned with applicable laws and regulations.
- Be transparent and properly recorded in the company's books and records.
- Be appropriate in relation to the type, value, frequency, occasion and position of the recipient.
- Not be offered, demanded, or accepted with the expectation of receiving any type of advantage in return.
- Never give the impression of dishonesty or impropriety.

We must not:

- Give or accept excessive gifts or entertainment or in exchange for any advantage or benefit.
- Give or accept excessive travel expenses.
- Give or accept inappropriate donations, sponsorships or memberships.
- Giving or accepting improper payments.
- Using third parties to give bribes on behalf of **GREENERGY**.
- Giving or accepting facilitation payments.

Sponsorships, donations and other types of contributions.

These are important to our social commitments and to the achievement of our mission. We examine them carefully to determine whether they promote the company's legitimate objectives. They may not be promised, offered or made for improper commercial advantage or for other unethical purposes and must have a legitimate purpose.

Political neutrality is our commitment

Ongoing dialogue with policy makers is of great importance to the overall success of the company. We are committed to political neutrality. **GREENERGY's** activities with respect to politicians, parties and various political offices will be non-partisan and based on the conclusion that such activities clearly support **GREENERGY's** commercial interests and business objectives, always in compliance with the law and our internal rules of conduct.

When it comes to payment

Payments are made to third parties every day in the course of **GREENERGY's** business. Processes help us ensure that payments are properly documented and made for valid purposes.

Facilitation payments are prohibited by the Code of Conduct.

We only maintain accounts or funds for legitimate purposes.

We only make payments to third parties that are legal and have a legitimate purpose.

We only make payments when they are properly documented.

In relationships with third parties

There are many legitimate reasons to involve a third party in business relationships.

However, using a third party to illegally or improperly influence a government official or private individual is prohibited.

Therefore, we screen our business partners at the beginning of our business relationships and monitor them during the development of our business relationships.

We are committed to ensuring that our partners in our value chain are aware of and act in accordance with our values and our compliance standards.

Warning signs that we must immediately question and clarify:

Inconsistencies in records and payments.

High prices with large discounts or excessively high profit margins.

Contractual partners with unclear responsibilities or questionable capabilities.

Suspicious personal relationships or business arrangements.

Unusually high fees, commissions, gifts, entertainment events or hospitality.

Refusal to include contractual anti-corruption clauses.

Demand for advance payments without a plausible business reason.

Demand for cash payments or transfers to bank accounts abroad or to third parties.

Relations with public administrations

At **GREENERGY**, we deal with public authorities and institutions with integrity, transparency and in accordance with the law. We always act responsibly and respect national and international regulations, especially those aimed at preventing corruption and bribery.

At **GREENERGY**, our relations with public entities are based on institutional respect and rigorous compliance with current legislation, as well as with our own internal rules of conduct.

In the event of any indication of illegal activity, we act with the utmost diligence to detect and report it. We maintain a firm commitment to collaborate with the judicial, administrative and supervisory authorities, scrupulously complying with their orders and resolutions.

We are committed to fair competition

At **GREENERGY**, we firmly support free competition, guided exclusively by market criteria such as quality, price, innovation and service. We reject any practice that distorts competition through unfair or unethical business practices.

Competition law exists to ensure a fair and transparent environment that benefits customers, businesses and society as a whole. We are therefore fully aware that failure to comply with these rules can have serious consequences, such as financial penalties, exclusion from public procurement processes, reputational damage and even criminal liability.

Consequently, we never engage in agreements or practices that limit competition with other market players.

We only talk to our competitors if we have a valid business reason and they do not represent a competition or *antitrust* issue.

We never talk to competitors about:

Pricing, pricing components or other conditions.

Market sharing, customer, or territory allocation.

Business opportunities or order entry.

Capacity, quotas or production volumes.

Corporate strategies or future market conditions, e.g. sales strategy, current or future product development, investments, and boycotts.

Bids and tenders.

Conduct during tenders or submission of false bids.



We manage conflicts of interest

We only make business decisions in the best interest of **GREENERGY** and its customers.

A conflict of interest exists if our personal interests differ from those of **GREENERGY** in our day-to-day business activities. We do not allow ourselves to be influenced by personal interests when making business decisions. These conflicts of interest can impede **GREENERGY's** success because they are made against the company's interest.

The following questions help us to assess whether there is a conflict or an appearance of a conflict:

Is the decision we make for **GREENERGY** influenced by personal interests?

What would a third party think about this situation?

How would the general public react to my decision?

We make business decisions in the best interest of our company and not on the basis of personal interests. We anticipate and avoid situations where a conflict of interest may arise.

As part of our work for **GREENERGY**, we do not engage companies with which we have a personal interest if it could benefit us personally, regardless of whether we have or can exert direct or indirect influence on **GREENERGY's** business decision.

We disclose any personal interest that may exist in connection with the performance of our duties.

Competition with **GREENERGY**

We do not work or operate in companies that compete with **GREENERGY** and we do not engage in any activities that compete with our company.

We comply with money laundering and terrorist financing legislation

Our activities carry the risk of being misused for money laundering or terrorist financing. **GREENERGY** aims to maintain business relationships only with reputable customers, partners and companies whose business activities comply with legal requirements and whose financial resources have a legitimate origin.

We employ a risk-based approach to verify the identity and financial background of our customers, business partners, and other third parties, as well as the origin of payments and ensure that they come from legitimate sources.

We immediately inform Compliance or our manager if we become suspicious of any activity or observe any suspicious signals.

Suspicious signals may include:

Payments channeled through a shell company, offshore bank account or an unknown third party.

Overpayment and desire for quick repayment, especially to an account other than the originating account.

Desire for cash payment.

An unusually large deposit.

An unusual and unnecessarily complicated business model for **GREENERGY's** product.

The third party does not have the necessary processes, human resources or financial resources.

Refusal to meet in person.

When necessary, we report any suspicious transactions to the relevant authorities.



We build trust with our financial integrity

At **GREENERGY**, as an international company, we are committed to providing accurate, complete and truthful information to our investors, employees, customers, partners, public bodies and society in general. We rigorously comply with all applicable laws, regulations and standards in each country where we operate, thus ensuring transparent and responsible communication.

We ensure that our books and records are kept complete, accurate and truthful. We ensure that they are prepared in a timely manner and in accordance with applicable regulations and standards. We comply with financial reporting guidelines and follow established internal control processes. We also provide correct and complete information for financial reporting.

For the application of tax legislation, or in the event of conflicts between tax regulations, we ensure that the tax result is consistent with the relevant economic and legal circumstances, and with our business models. We do not employ artificial structures or shell companies whose sole purpose is to obtain illegal tax advantages. We provide the tax authorities with transparent information on our tax strategy and business activities in accordance with existing regulations.

We do not use inside information

Inside information is any specific information about **GREENERGY** that is not public and which, if it were public or had become public, could influence or have substantially influenced the price of the listed shares.

An insider is subject to strict legal requirements. In addition, illegal insider trading is subject to severe sanctions and could have considerable consequences for the company concerned and give rise to personal and criminal liability.

We at **GREENERGY** live up to the trust placed in us.

We do not engage in transactions that are based on inside information.

We do not persuade or recommend others to engage in transactions based on inside information.

We handle information that could be and is privileged with strict confidentiality and ensure that unauthorized persons do not have access to it.

We protect personal data

The protection of personal data is important to **GREENERGY**. We treat it carefully and responsibly and respect everyone's privacy. The loss or misuse of personal data can result in serious consequences for the persons concerned. It is very important to **GREENERGY** to ensure that this data is effectively protected and used only for legitimate purposes. All of us who handle the personal data of employees, customers, or third parties assume a high degree of responsibility.

We collect and process personal data only for legitimate, pre-determined purposes and in a transparent manner.

We only process personal data if it is protected against loss, modification, and unauthorized use or disclosure through appropriate technical and organizational measures.

We will promptly report possible breaches in relation to the protection of personal data.

We stand by our products and services

We do not make statements that contain false information about our product or service or omit information about product or service defects at any stage of their development, marketing or use. We are transparent and stand by our technical commitments.

In our areas of responsibility, we ensure that our products, services and solutions are safe and comply with applicable legal requirements.

We work with responsible business partners

Business relationships with our customers, suppliers and other business partners are fundamental to **GREENERGY**. We maintain

a proactive attitude towards our stakeholders and pay special attention to our supply chain.

We only maintain business relationships with reputable and legally compliant partners. We protect the interests of our customers by carefully selecting suppliers and other business partners. We work closely with our suppliers and business partners and constantly analyze our existing business relationships and react immediately to emerging risks.

Sustainability is a key element of our supplier management.

We proactively include contractual clauses with our suppliers and business partners to adhere to our Supplier Code of Conduct.

We are socially and environmentally responsible.

The preservation of the environment is fundamental to **GREENERGY** and is ensured through an appropriate environmental policy.

At GREENERGY, we work to promote the development of renewable energies, transforming our knowledge and experience into innovative solutions that contribute to social welfare and environmental progress, minimizing our impact on the environment as much as possible.

We understand that our role goes beyond the generation of energy: we seek to improve the quality of life and generate value in the communities where we operate. For this reason, we are firmly committed to social responsibility, respecting the cultural diversity, customs and values of each community in which we carry out our activities.

Aligned with Human Rights

At **GREENERGY**, we consider human rights to be a fundamental pillar of responsible business conduct. Therefore, we actively promote their respect and protection in all our operations.

Our activities are conducted in strict alignment with the United Nations Guiding Principles on Business and Human Rights, as well as the principles of the United Nations Global Compact. Compliance with human rights laws and regulations is not only essential, but also a firm commitment of our company.

From the earliest stages of any decision or initiative we undertake on behalf of **GREENERGY**, we carefully assess potential adverse human rights impacts, both inside and outside the organization.

We strive to avoid or mitigate any negative effects related to our business activities, regardless of whether **GREENERGY** has caused them directly or contributed to them indirectly.

We also respect the human rights of all people, with special attention to those in vulnerable situations.



5 | How we report

At **GREENERGY**, we report possible breaches of our Code of Conduct or applicable laws. In doing so, we help to identify and eliminate misconduct and thus protect the company and ourselves against risks or harm that may arise.

We may report any situation that indicates a breach of the Code of Conduct to the following persons or entities:

To our Officers
To Human Resources
To the Compliance Officer
In our Whistleblower Channel
To employee representatives

At **GREENERGY**, anyone can confidentially - and, if desired, anonymously - report possible breaches of the Code of Conduct. All reports will be taken seriously and appropriate action will be taken.

We categorically reject any retaliation against those who make a report in good faith. Any action against this protection will be treated with the same severity as a direct violation of the Code.

All communications received will be handled in accordance with established formal procedures, respecting the presumption of innocence and, where required by local regulations, ensuring the involvement of employee representatives. These principles also apply to complaints filed by third parties.

In cases where non-compliance is established, **GREENERGY** will take appropriate disciplinary action.

6 | How we respond

GREENERGY may sanction employees and collaborators who violate the provisions of this Code. In any case, failure to comply with the provisions of this document - as well as those protocols or procedures that develop and complement it - may give rise to:

- (i) The corresponding disciplinary sanctions in accordance with the statutory regime, Collective Bargaining Agreement and labor legislation.
- (ii) To claim the corresponding liability in which the offender may have incurred as a result of the damages caused to **GREENERGY**.

In those cases in which conduct contrary to this Code is carried out by third parties, **GREENERGY** reserves the right to:

- (i) Proceed to the immediate termination of the business relationship and, additionally.
- (ii) Claim the corresponding liability arising from the breach of any obligations the infringer may have contracted with **GREENERGY**.

In the case of facts that may reach a criminal entity or constitute an administrative breach, **GREENERGY** will offer maximum cooperation to the relevant authorities and public bodies in those judicial and / or administrative proceedings that may be initiated on the occasion of these.



