HUMAN RIGHTS POLICY

2025

1. Introduction

Greenvolt Group ("Greenvolt" or "We") is a leading and a recognized company in the Portuguese and international renewable energies markets, pursuing a strategy completely focused on renewable energies across three business segments:

I. Sustainable Biomass: Focused on producing electricity from forestry and agricultural residues in Portugal, as well as from wood waste and sustainably managed forestry biomass in the United Kingdom, supporting circular resource use and responsible forest management;

II. Utility-Scale: Focused on the development, construction, and operation of large-scale solar, wind, and battery storage projects, supported by in-house expertise across the entire value chain;

III. Decentralized Generation: Focused on integrated clean energy solutions, from customer acquisition to system installation and the provision of long-term electricity supply agreements. It also operates in the collective self-consumption market through the creation and management of energy communities.

We recognize the growing complexity and scale of renewable energy operations, which involve global supply chains, cross-border projects, and multi-stakeholder engagement. In this context, and given the nature of our sector of activity, Greenvolt is committed to preventing and mitigating potential adverse impacts on human rights.

This Human Rights Policy affirms our unwavering commitment to respecting and promoting human rights in line with all applicable national laws, international standards, and globally recognized and ratified conventions, including, but not limited to, the Universal Declaration of Human Rights, the International Covenant for Civil and Political Rights, the International Covenant for Economic, Social and Cultural Rights and the United Nations Guiding Principles on Business and Human Rights. We recognize that our responsibility goes beyond compliance, encompassing a proactive approach to identifying, preventing, mitigating, and remedying any actual or potential adverse human rights impacts that may arise from our activities, operations, or business relationships. This includes our interactions with employees, contractors, suppliers, customers, and communities affected by our presence or practices.

We are committed to embedding human rights considerations into our corporate governance, decision-making processes, and risk management frameworks, ensuring that respect for human dignity, equality, and freedom is upheld across all levels of our organization. We strive to foster a culture of transparency, accountability, and continuous improvement, and we engage with stakeholders in good faith, listening to concerns, and taking appropriate action whenever human rights issues are identified. Through ongoing training, monitoring, evaluation

and collaboration, we aim to build a resilient and ethical business environment that contributes positively to society and reflects our core values of integrity, fairness, and respect for all individuals.

2. Purpose

The purpose of this Policy is to establish a clear and actionable commitment to the early identification, assessment, and management of human rights risks that may arise in connection with our operations, supply chains, broader business relationships, and interactions with local communities. It is intended to ensure that human rights considerations are not treated as peripheral concerns, but are instead embedded into the core of our daily decision-making processes across all levels of the organization. This includes a particular focus on our interactions with employees, contractors, suppliers, and other business partners, recognizing the significant influence these relationships have on human rights outcomes. The Policy also reaffirms as our responsibility to respect and uphold the rights of communities and societies that may be directly or indirectly affected by our business activities. By integrating human rights principles into our strategic planning, operational practices, and stakeholder engagement, we aim to foster a culture of ethical conduct, transparency, and accountability, while contributing positively to the social and economic environments in which we operate.

We are committed to supporting and advancing the UN Sustainable Development Goals (SDGs), recognizing their intrinsic connection to internationally recognized human rights. Our approach to sustainability is guided by the Ten Principles of the UN Global Compact on human rights, labour, environment, and anti-corruption.

Furthermore, this Policy is aligned with key international frameworks, and we formally adopt these principles as the foundation of our business conduct and commitment to responsible practices, including:

- EU Corporate Sustainability Due Diligence Directive (CSDDD);
- Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work;
- ILO Conventions, including:
    - Freedom of Association and Collective Bargaining (Conventions No. 87 and 98);
    - Elimination of Forced or Compulsory Labour (Conventions No. 29 and 105);
    - Abolition of Child Labour (Conventions No. 138 and 182);
    - Elimination of Discrimination in Employment and Occupation (Conventions No. 100 and 111);

  - Occupational Health and Safety and Working Time Conventions, applicable across all operations;
  - ILO Convention No. 169 on Indigenous and Tribal Peoples;
- United Nations Declaration on the Rights of Indigenous Peoples, guiding Greenvolt's respect for vulnerable groups;
- Conventions ratified by Portugal;
- OECD Guidelines for Multinational Enterprises; and
- United Nations Guiding Principles on Business and Human Rights (UNGPs).

This Policy also anticipates compliance with forthcoming EU legislation directly applicable to our sector, namely the EU Deforestation Regulation, the EU Regulation prohibiting products made with forced labour and any other directives that may emerge as applicable.

3. Scope

This Policy, approved by the Board of Directors, applies to all companies of the Greenvolt Group, namely to companies wholly owned by Greenvolt and to companies in which Greenvolt has control.

- In the case of companies in which Greenvolt exercises co-control or influence exerted by governance mechanisms (namely joint ventures), the Greenvolt representatives present on the management body must, by virtue of exercising co-control or considerable influence, promote the adoption of the measures necessary for the local transposition of this Policy.
- In the case of companies in which Greenvolt does not exercise significant control or influence exerted by governance mechanisms, Greenvolt' s representatives shall comply with the provisions of this Policy in the performance of their duties, and, whenever possible, promote the adoption of the established rules and mechanisms.

The principles set out in this Policy also apply to all individuals or entities providing services or acting on behalf of any Greenvolt company on a permanent or temporary basis, including suppliers, contractors, and subcontractors. These stakeholders are expected to respect and promote the human rights commitments embedded in this Policy throughout their activities and supply chains.

4. Principles

To uphold its commitment to human rights, Greenvolt adheres to a set of core principles that inform all aspects of its operations, across business segments and throughout its value chain. These principles are rooted in internationally recognized human rights frameworks and informed by insights from independent third-party due diligence conducted across Greenvolt's activities. They also incorporate perspectives from both internal and external stakeholders, while remaining aligned with evolving global trends and regulatory developments.

i. **PROMOTE DIGNIFIED WORKING CONDITIONS:** We are committed to fostering respectful, safe, and empowering work environments across our operations and supply chain, where individuals are treated with fairness and humanity. We actively work to prevent exploitative practices, support physical and mental well-being, and uphold employees' rights to freedom of association, non-discrimination, and personal development. By embedding dignity and respect into workplace standards and supplier expectations, we advance a culture of integrity, inclusion, and long-term sustainability.

ii. **ENSURE FAIR LIVING WAGES FOR ALL EMPLOYEES:** We are committed to ensuring that all individuals engaged in our operations and supply chain receive fair living wages. This includes promoting contractual accountability with service providers to uphold wage standards that meet or exceed local living wage benchmarks. By embedding wage fairness into supplier agreements and monitoring compliance, we promote economic dignity and equity across our business ecosystem.

iii. **PROTECT THE HEALTH AND SAFETY OF ALL EMPLOYEES:** We are committed to safeguarding the health and safety of all individuals engaged in our operations, with particular emphasis on construction and industrial environments, including the installation of solar, wind, and energy storage systems. We apply rigorous health and safety standards aligned with international best practices, ensuring proactive risk management, training, and oversight. These standards are equally extended to subcontractors and service providers, reinforcing a shared responsibility for safe working conditions throughout our value chain.

iv. **FOSTER NON-DISCRIMINATION AND EQUAL TREATMENT:** We are committed to building a workplace culture rooted in fairness, non-discrimination, equal treatment, and respect for diversity. We actively integrate principles of diversity, equity, and inclusion into our hiring, promotion, and daily work practices, ensuring that no individual is disadvantaged or excluded based on gender, ethnicity, national origin, religion, disability, sexual orientation, or any other personal characteristic. By embedding inclusive values into its operations and supply chain, we promote a fair, respectful, and empowering environment for all.

v. **PREVENT AND ADDRESS ALL FORMS OF SEXUAL AND MORAL HARASSMENT:** We are committed to preventing and addressing all forms of sexual and moral harassment across our operations and value chain.

We foster safe, respectful, and inclusive working environments by implementing robust policies, mandatory training, and accessible grievance mechanisms. All employees, contractors, and service providers are expected to uphold these standards, with any violations addressed through prompt and appropriate action and investigation. Through continuous awareness and accountability, we reinforce a culture of dignity, respect and trust.

vi. **RESPECT MINORITIES AND OTHER VULNERABLE GROUPS:** We are committed to respecting and promoting the rights of minorities and other vulnerable groups, including the rights of indigenous peoples whenever applicable in the context of our operations. We actively foster inclusion, safeguard rights, and ensure equal access to opportunities for all employees. These principles are also extended across our value chain, promoting a culture of equity, representation, and social responsibility in all business relationships.

vii. **GUARANTEE RESPONSIBLE PROCUREMENT PRACTICES:** We are committed to assessing and monitoring human rights risks across our value chain and strengthening due diligence processes with suppliers, particularly in high-risk geographies and sectors. We prioritize transparency, accountability, and ethical sourcing to safeguard human rights and foster sustainable, long-term business relationships.

viii. **ELIMINATE ALL FORMS OF FORCED LABOUR, HUMAN TRAFFICKING AND PRACTICES SIMILAR TO SLAVERY:** We are committed to eliminating these practices across our operations and supply chain. This commitment is enforced through rigorous supplier screening procedures, binding contractual obligations, and continuous monitoring of high-risk sectors and geographies. We expect all partners to uphold these standards and reserve the right to terminate relationships with entities that fail to comply. By embedding zero-tolerance policies into our procurement and oversight frameworks, we advance human dignity and ethical business conduct.

ix. **EFFECTIVE ABOLITION OF CHILD LABOUR:** We are committed to ensuring that no person below the legal minimum working age, as defined by national laws and international standards, is employed in our operations. This commitment extends across our value chain, requiring all suppliers, subcontractors, and business partners to uphold the same principles. Through screening, contractual enforcement, and ongoing monitoring, we safeguard children's rights while supporting access to education and safe development opportunities.

x. **PROTECT DATA PRIVACY:** We are committed to safeguarding the fundamental right to privacy of all individuals whose data we process across our operations and value chain. We ensure that the collection, storage, use, and sharing of personal information are conducted lawfully, transparently, and in compliance with applicable data protection regulations. Guided by the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and

confidentiality, and accountability, we actively prevent unauthorized access, misuse, or disclosure of data. By embedding robust privacy practices and security measures into our operations and supplier agreements, we uphold individual dignity, autonomy, and trust in all our interactions.

xi. **RESPECT AND PROTECT LAND RIGHTS:** We are committed to recognizing and upholding legitimate land tenure rights in line with applicable national laws and international standards, including UN and OECD frameworks. We ensure that our business activities do not involve land grabbing, forced evictions, or any other unlawful interference with land use or ownership. We comply with legal requirements and whenever relevant participatory consultations with affected communities and stakeholders are held. These obligations extend to subcontractors and service providers, who are contractually required to meet the same standards of lawful and ethical conduct.

xii. **UPHOLD ENVIRONMENTAL AND PUBLIC HEALTH STANDARDS:** We are committed to identifying and mitigating potential negative social and environmental impacts of our operations, in accordance with applicable laws, international frameworks, and industry best practices. We implement appropriate risk management procedures and foster transparent, timely, and inclusive engagement with affected communities and relevant stakeholders. These obligations apply across all business activities and extend to contractors, suppliers, and third-party service providers throughout Greenvolt's value chain.

We operate in full compliance with the national laws and regulations of each jurisdiction in which it conducts business. In instances where local legislation conflicts with internationally recognized human rights standards, Greenvolt will endeavour to identify and implement solutions that uphold the highest principles of international human rights law. This approach reflects Greenvolt's commitment to ethical conduct, legal integrity, and the protection of fundamental rights across all its operations and partnerships.

5. Other Related Policies

This Policy shall be interpreted and applied in alignment with the broader governance framework of the Greenvolt. It does not operate in isolation but complements and reinforces the principles and commitments outlined in other existing policies. Key reference documents include:

- Code of Ethics and Conduct
- Health and Safety Policy
- Diversity, Equity, and Inclusion Policy
- Supplier Code of Conduct

- Sustainable Procurement Policy
- Personal Data Protection Policy
- Privacy Policy
- Whistleblower Policy (including whistleblower channel)
- Sustainability Policy
- Social Investment Policy

Together, these policies form an integrated foundation for responsible investment practices, ethical conduct, and sustainable value creation across the Greenvolt's operations.

6. Monitoring Mechanisms

Greenvolt is committed to identifying, preventing, protecting and remedying human rights violations that may arise directly or indirectly from its business activities and value chain. In alignment with international best practices, Greenvolt undertakes this responsibility through the following mechanisms, among others:

- **Regular Risk Assessment:** We conduct regular risk assessments of actual and potential human rights risks and impacts associated with our operations, supply chain, and project activities. This includes identifying, developing and implementing preventive measures, detection protocols and mitigating strategies as part of a comprehensive human rights due diligence system.
- **Integration into Internal Processes:** We integrate human rights risk assessment findings into internal governance and operational procedures. This involves the systematic review and, where necessary, revision of existing policies, protocols, and management systems to reflect the most salient human rights risks identified. By embedding these insights into decision-making and compliance structures, we ensure that our human rights due diligence informs continuous improvements across all business units and functions.
- **Auditing:** We carry out regular audits to identify deviations from our human rights standards and implement corrective measures when necessary. This ensures respect for universal human rights, compliance across operations, projects, and the value chain, reinforcing accountability and continuous alignment with best practices.
- **Transparent Reporting:** We ensure transparent communication of Greenvolt's performance in identifying, addressing, and managing human rights risks and impacts. This is achieved through regular reporting and engagement with stakeholders.

- **Stakeholder Knowledge Enhancement:** We conduct periodic training and awareness initiatives tailored to different functional areas to ensure understanding of the human rights framework, rights and responsibilities and their impact on our business. Additionally, we engage with external stakeholders, including suppliers, by sharing information on human rights expectations and providing capacity-building activities based on risk assessments and identified improvement opportunities.
- **Whistleblowing Channel:** Any potential violation of this Human Rights Policy may be reported through Greenvolt's Whistleblower Channel. This reporting mechanism is accessible to employees, business partners, suppliers, customers, community members, and other stakeholder groups affiliated with Greenvolt. All submissions will be received, reviewed, and assessed in accordance with the procedures and safeguards outlined in the Whistleblower Policy, which is available publicly. Greenvolt ensures confidentiality, protection against any form of retaliation, secure and lawful processing of personal data, and timely, appropriate follow-up for all reports submitted in good faith.

Such mechanisms can be activated with the recurrence that may be deemed necessary.

7. Remediation and Grievance mechanisms

We commit to providing, or helping to provide, appropriate remediation to individuals, employees, and communities where Greenvolt has identified that it has caused or contributed to adverse impacts. Remediation will be pursued through relevant judicial and non-judicial mechanisms, in accordance with applicable laws and international standards. Where appropriate, Greenvolt will engage and collaborate with competent authorities, civil society organizations, and other stakeholders to ensure that concerns are addressed in a timely, effective, and responsible manner. This commitment reflects the Greenvolt's adherence to the UN Guiding Principles on Business and Human Rights and its broader duty of care.

8. Approval Mechanism

The Board of Directors establishes, endorses, and oversees the principles underpinning this Human Rights Policy. These principles are binding and must be implemented by Directors and Managers across all departments and operational areas, with the active support and engagement of all employees.

Greenvolt recognizes that the effective realization of human rights commitments requires coordinated action and shared responsibility, reinforcing a unified approach across the organization.

9. Review Mechanism

This policy reflects Greenvolt's commitment to respecting and promoting human rights across all aspects of its operations. It is the outcome of a comprehensive consultation process involving internal teams and external stakeholders. Recognizing that human rights risks and expectations evolve over time, this policy is designed to be dynamic and responsive to emerging challenges and opportunities.

To uphold and continuously strengthen our human rights performance, Greenvolt commits to:

- A multidisciplinary team integrating, at least, members of the Sustainability, People, and Compliance departments are responsible for conducting a formal review of this Policy every two years, with the support of other relevant teams as needed. Additional reviews may be undertaken in response to material changes in applicable laws, regulations, or industry standards, or if there are significant shifts in the Greenvolt's geographical footprint, business operations, or stakeholder expectations.
- Review findings and recommended updates will be presented to the Board of Directors (or a standing committee), ensuring senior-level oversight aligned with global best practices in human rights governance.
- Outcomes of the review will be reported through the Greenvolt's Annual Report and shared internally through appropriate channels to ensure broad awareness and consistent implementation across all relevant functions.

10. Final dispositions

To ensure broad awareness and understanding and consistent application, this Policy will be communicated to all employees and relevant stakeholders. Its principles and commitments will be reinforced through targeted training and capacity-building initiatives across the organization.

Any request for clarification or further information regarding this Policy may be directed to Sustainability and Health & Safety Team at: sustainability@greenvolt.com.

Document control log

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(every significant revision of the document has to identified and the Process Management team informed)