DIVERSITY, EQUALITY AND INCLUSION POLICY

2026

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 global nature of renewable energy operations, which involve diverse workforces, cross-border projects, and multi-stakeholder engagement. In this context, and given the nature of our sector, Greenvolt is committed to fostering an inclusive, diverse, equitable, and accessible environment where all individuals are treated with dignity, fairness, and respect.

This commitment is guided by applicable laws and internationally recognized principles on equality and non-discrimination. We recognize that promoting diversity and inclusion goes beyond compliance, requiring proactive efforts to identify and remove barriers, prevent discrimination, and create equal opportunities across all aspects of our operations and relationships.

We strive to embed diversity, equality and inclusion into our organizational culture, decision-making, and business practices. This includes supporting an inclusive workplace for employees, as well as engaging responsibly with contractors, suppliers, customers, and communities. Through ongoing awareness, training, and continuous improvement, we aim to cultivate an environment where differences are valued, voices are heard, and everyone has the opportunity to contribute and succeed.

2. Purpose

The purpose of this Diversity, Equality and Inclusion Policy ("Policy") is to establish a clear and actionable commitment to promoting the principles of diversity, equality and inclusion across all aspects of Greenvolt Group's operations, working environment, and business relationships. It aims to ensure equal opportunities by removing barriers and preventing discrimination, exclusion, or unfair treatment affecting employees, members of management and supervisory bodies, as well as other stakeholders.

This Policy embeds these principles into decision-making at all levels of the organization, recognizing that an inclusive and diverse culture is essential to sustainable performance, innovation, and long-term value creation. It applies to all professionals within Greenvolt Group and extends to interactions with contractors, suppliers, business partners, and communities.

For Greenvolt, diversity is understood as the combination of visible and non-visible characteristics that make individuals unique; equality refers to fair and impartial treatment, ensuring access to opportunities and resources; and inclusion is the practice of valuing individual differences and creating an environment where all people can participate, contribute, and thrive, fostering respect, safety, well-being, belonging, and engagement.

This Policy establishes guiding principles for behaviours, attitudes, and decision-making across the organization, reinforcing the Greenvolt Group's commitment to developing diverse talent, ensuring respectful and fair treatment, promoting equal opportunities, and fostering an inclusive and accessible culture. It should be read in conjunction with the Greenvolt Group Code of Ethics and Conduct and other relevant internal policies.

Aligned with our broader sustainability commitments, this Policy is informed by internationally recognized frameworks and directives and grounded in global principles of diversity, equality, non-discrimination, and inclusive workplaces. It further reflects evolving best practices and regulatory developments, including but not limited to:

- Ten Principles of the UN Global Compact;
- UN Sustainable Development Goals (SDGs);
- Universal Declaration of Human Rights;
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work;
- ILO Conventions, including:
    - Equal Remuneration (Convention No. 100);
    - Discrimination (Conventions No. 111);
    - Violence and harassment in the world of work (Convention No. 190)

- Conventions ratified by Portugal; and
- Women's Empowerment Principles (WEPs).

Greenvolt Group also promotes the adoption of these principles by its business partners, suppliers and other related third parties, in accordance with its Supplier Code of Conduct and Sustainable Procurement Policy.

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 support the diversity, equality and inclusion commitments embedded in this Policy throughout their activities and supply chains.

4. Principles

To uphold its commitment to diversity, equality and inclusion, Greenvolt adheres to a set of core principles that inform all aspects of its operations, across business segments and throughout its value chain:

i. **ENSURE COMPLIANCE WITH APPLICABLE LEGISLATION:** We are committed to acting in full compliance with all applicable laws and regulations related to diversity, equality, and inclusion across all jurisdictions in which we operate. We uphold the highest standards of legal and ethical conduct, ensuring that our policies, practices, and decision-making processes align with regulatory requirements, international conventions, and

best practices. This commitment reinforces our responsibility to protect individual rights, promote equal opportunities, and foster an inclusive and legally compliant work environment throughout the Greenvolt Group.

ii. **PROMOTE DIGNITY AND RESPECT IN THE WORKPLACE:** 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 uphold zero tolerance for all forms of bullying, harassment, intimidation, or discriminatory behaviour, whether in physical or digital working environments, reinforcing a culture of integrity, inclusion, and long-term sustainability.

iii. **ENSURE NON-DISCRIMINATION AND EQUAL TREATMENT:** We are committed to building a workplace culture rooted in fairness, non-discrimination, and respect for diversity, ensuring that no individual is disadvantaged or excluded based on gender, gender identity or expression, ethnicity, national origin, race, religion, disability, sexual orientation, age, socioeconomic background, neurodiversity, or any other personal characteristic, visible or non-visible. we recognize and actively value diversity in all its forms, including differences in generations, knowledge, experience, and skills, embracing these differences as a source of strength, innovation, and collective human potential.

iv. **PROMOTE GENDER EQUALITY AND A BALANCED LEADERSHIP:** We are committed to ensuring that processes related to recruitment, performance evaluation, remuneration and benefits, training, promotion, and other professional development practices actively promote gender equality and eliminate gender bias. We set measurable, time-bound targets for women representation on both workforce and leadership level, and report regularly on progress.

v. **FOSTER INCLUSIVE LEADERSHIP AND A SENSE OF BELONGING:** We are committed to embedding inclusive leadership as a core competency at all levels of the organization. Leaders are encouraged to create psychologically safe environments where every voice is heard, valued, and considered in decision-making. Beyond inclusion, we actively cultivate and measure engagement through the Company's Climate Survey.

vi. **APPLY MERIT, TRANSPARENCY, AND PAY EQUITY:** We are committed to ensuring that the recognition of personal skills and professional merit is based on objective, transparent, and rigorous criteria across all evaluation and remuneration processes, guaranteeing equality of opportunity regardless of gender, background, or level within the organization. We conduct pay equity analyses to identify unjustified remuneration gaps and develop targeted strategies to address and eliminate them, in line with applicable legal and reporting requirements.

vii. **PREVENT AND ADDRESS HARASSMENT:** We are committed to preventing and addressing all forms of sexual and moral harassment, as well as any other discriminatory practices in the workplace and across our value

chain through robust policies, processes, and accessible grievance mechanisms. All employees, contractors, and service providers are expected to uphold these standards, with any violations subject to prompt, fair, and appropriate investigation and action.

viii. **PROMOTE WORK-LIFE BALANCE AND EMPLOYEE WELLBEING:** We are committed to promoting flexible working arrangements and other mechanisms that promote equal opportunities, wellbeing, and a safe workplace environment, where feasible and in in accordance with applicable legislation and operational requirements, following best practices across the geographies in which the Greenvolt Group operates.

ix. **BUILD AWARENESS AND COMMUNICATE INCLUSIVELY:** We are committed to integrating the principles of this Policy into Greenvolt's Group People Management Strategy and organizational culture. We provide specific training on diversity, equality, and inclusion, including unconscious bias, to build awareness among our employees and other relevant stakeholders. We promote the active participation of the Greenvolt Group in relevant external initiatives related to the topic to share, learn, and strengthen our diversity practices. Furthermore, we ensure the use of inclusive language and imagery across all internal and external communications, reflecting the diverse reality of our organization and prohibiting the use of discriminatory language in any context.

x. **EMBED DIVERSITY ACROSS THE VALUE CHAIN:** We are committed to promote the inclusion of diversity, equality and inclusion principles by our business partners, suppliers and other related third parties, in accordance with our Supplier Code of Conduct. We recognize that a diverse and inclusive value chain strengthens resilience, innovation, and shared value creation.

xi. **PROMOTE EQUAL OPPORTUNITIES IN THE COMMUNITY:** We are committed to actively fighting social inequalities and promoting equal opportunities beyond the boundaries of our organization. This includes awarding merit scholarships to underprivileged children and young people, implementing social inclusion initiatives for people with disabilities, and encouraging the participation of Greenvolt Group employees in volunteer programmes. Through these actions, we seek to contribute to more equitable communities in the regions where we operate, reinforcing our belief that inclusion must extend beyond the workplace.

xii. **ENSURE A JUST AND EQUITABLE ENERGY TRANSITION:** As a renewable energy company with a global footprint, we recognize our responsibility to ensure that the clean energy transition is just and equitable. We work to ensure that communities benefit from the transition to a low-carbon economy.

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 equality standards, Greenvolt will endeavour to identify and implement solutions that uphold the highest applicable principles.

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
- Supplier Code of Conduct
- Sustainable Procurement Policy
- Whistleblower Policy (including whistleblower channel)
- Sustainability Policy
- Social Investment Policy
- Human Rights 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 monitoring the implementation and effectiveness of this Policy across its operations. In alignment with international best practices on diversity, equality and inclusion, we undertake this responsibility through the following mechanisms, among others:

- **Transparent Reporting:** We ensure transparent communication of Greenvolt Group's performance on diversity, equality, and inclusion through regular reporting of relevant metrics to internal and external stakeholders.
- **Integration into Internal Processes:** Diversity, equality and inclusion principles and monitoring findings are integrated into the Group's People Management Strategy, governance structures, and operational procedures. This involves the systematic review and, where necessary, revision of existing policies, processes, and management systems to reflect identified gaps or improvement opportunities, ensuring continuous progress across all business units and functions.
- **Whistleblowing Channel:** Any potential violation of this Diversity, Equality and Inclusion 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.

- **Stakeholder Training and Awareness:** Periodic training and awareness initiatives are conducted across functional areas to ensure understanding of the principles, rights, and responsibilities set out in this Policy and their application in day-to-day business activities.
- **Supply Chain Engagement:** Relevant diversity, equality and inclusion requirements are integrated into supplier onboarding, contractual frameworks, and the Supplier Code of Conduct. Greenvolt engages with suppliers and business partners to encourage alignment with these principles and the continuous improvement of their own practices.

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 in the context of diversity, equality and inclusion. 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 Greenvolt's broader duty of care and its adherence to principles of fairness and accountability.

8. Approval Mechanism

The Board of Directors establishes, endorses, and oversees the principles underpinning this Diversity, Equality and Inclusion 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 its diversity, equality and inclusion commitments requires coordinated action and shared responsibility, reinforcing a unified approach across the organization.

9. Review Mechanism

The People and Sustainability and Health & Safety Departments are responsible for reviewing this Policy every two years, or whenever there are relevant changes to the applicable legal framework and the context of the activities carried out by the Greenvolt Group, presenting the proposed changes to the Board of Directors.

10. Final dispositions

To ensure broad awareness, 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

Phase	Responsible	Date
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Verified by	Legal Department	23/07/2026
Approved by	Board of Directors	24/07/2026

Related content

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Process Map	-
Other document associated	MA.8.Gender Equality Plan.GVP.PT

Revision history

Revision	Date of approval	Elaboration by	Approval by	Observation
00	2022	Sustainability and Health & Safety Department People Department	Board of Directors	-
01	24/07/2026	Sustainability and Health & Safety Department People Department	Board of Directors	-

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