



THIRD PARTY

Code of Conduct

	Third Party Code of Conduct	CO: 3	
Group		Revision: 00	10-09-2026

Message from the Greenvolt Group CEO to Third Parties

At Greenvolt, we believe that the energy transition can only be achieved through responsible partnerships built on trust, integrity and a shared commitment to sustainability.

Every organization working with or on behalf of Greenvolt plays an important role in delivering our strategy and creating long-term value. For this reason, we expect all our Third Parties to conduct their activities ethically, responsibly and in compliance with applicable laws, while respecting people, protecting the environment and acting with integrity in everything they do.

This Third-Party Code of Conduct sets out the principles and expectations that guide our business relationships. It reflects our commitment to responsible business conduct and provides a common framework for working together with transparency, accountability and mutual trust. It also reflects our desire that everyone involved in our business relationships to “speak up” if they see or suspect misconduct so it can be fairly examined and properly addressed.

We believe that strong partnerships are built on shared values and continuous improvement. By embracing these principles and promoting them throughout your own organization and value chain, you help strengthen our collective impact and contribute to a more sustainable future.

Thank you for your partnership and for sharing our commitment to doing business responsibly.

João Manso Neto, CEO of Greenvolt Group

	Third Party Code of Conduct	CO: 3	
Group		Revision: 00	10-09-2026

Contents

1. Purpose and scope of the Third-Party Code of Conduct	3
2. Business Integrity	3
3. Human Rights and Fair Working Conditions	4
4. Health and Safety	5
5. Environment and Sustainability.....	5
6. Information Protection and Cybersecurity.....	5
7. Raising Compliance Questions and Concerns	6
8. Consequences of Failure to Comply.....	6
9. Accurate Records and Transparency	6
10. Related Policies	7

 Group	Third Party Code of Conduct	CO: 3	
		Revision: 00	10-09-2026

1. Purpose and scope of the Third-Party Code of Conduct

This Third-Party Code of Conduct ("Code") sets out the minimum standards of business conduct that Greenvolt expects from suppliers, contractors, consultants, agents, and other business partners ("Third Parties").

Greenvolt is committed to following all applicable laws and to conduct business with integrity, transparency, and respect for people and the environment. We expect the organizations we work with to share these values and to conduct their activities in a responsible and lawful manner. We expect everyone to practice good judgement when working with or on behalf of Greenvolt. All Third Parties must conduct themselves according to this Code in a manner that avoids even the appearance of improper behaviour.

As part of our commitment to ethical business conduct, any individual associated with a Third Party or Greenvolt who witnesses or suspects conduct related to the Third Party's relationship with Greenvolt, or activities performed on behalf of Greenvolt, that may violate this Code is encouraged to report the matter to the Greenvolt Compliance Team. Reports can be made direct by emailing 'compliance@greenvolt.com' or anonymously [here](#). Greenvolt has a strong commitment to non-retaliation and will not tolerate any retaliatory activities towards anyone who makes a report of suspected misconduct in good faith.

2. Business Integrity

Integrity is fundamental to Greenvolt's business relationships. Third Parties are expected to act honestly, fairly and transparently in connection with their relationship with Greenvolt. Greenvolt business decisions will be based on legitimate commercial considerations and never on improper influence or personal benefit.

It is never permissible for Greenvolt or any of their 3rd Parties to participate in any illegal or unethical activities. And while it is impossible to list every illegal or unethical situation, below are common business integrity principles to keep in mind.

Anti-Bribery and Corruption

Third Parties must not offer, promise, give, request or accept bribes, kickbacks or Anything of Value¹ to gain an Improper Business Advantage². Gifts, hospitality and business courtesies must be reasonable, lawful, transparent and never intended to improperly influence a business decision. Third Parties must comply with applicable international and local anti-bribery and anti-corruption laws.

Dealings with Government Officials

Interactions with government officials require particular care. In many jurisdictions in which Greenvolt operate, gifts, travel, and entertainment provided to government officials are not legally permitted or otherwise severely restricted.

¹ "Anything of Value" should be broadly interpreted to include, cash, gifts, gifts to family members, loans, forgiveness of a debt, personal favours, entertainment, meals and travel, conference sponsorships, political and charitable contributions, employment and internship opportunities, and business opportunities, among other items.

² An "Improper Business Advantage" may include, but is not limited to, for example such activities as obtaining insider information (e.g., access to sealed bid information); influencing contracts, influencing legislation; improperly securing a required permit, license, or certification; or avoiding or reducing taxes, customs fees, or import duties.

	Third Party Code of Conduct	CO: 3	
Group		Revision: 00	10-09-2026

Generally, Third Parties must not offer, provide or authorize anything of value to public officials, state-owned entities or government representatives to obtain, retain or influence business decisions or secure an Improper Business Advantage. Any gift or entertainment provided to a government official must be of minimal value and not done on a recurring basis.

Any engagement with government authorities on behalf of Greenvolt should be conducted lawfully, transparently and in accordance with applicable legal and ethical standards.

Facilitation Payments

Facilitation payments, which are payments made to expedite or facilitate the performance of a public official for a non-discretionary, routine governmental action, are prohibited.

Third Parties must not make unofficial payments, regardless of the amount involved, to secure or accelerate routine governmental actions, permits, approvals or administrative processes.

Economic Sanctions and Restricted Jurisdictions

Greenvolt is committed to attaining full compliance with applicable import, export, and economic sanctions, regulations, and policies wherever we operate.

Third Parties must comply with applicable economic sanctions, trade restrictions and export control laws.

Third Parties must not engage in activities that could expose Greenvolt to sanctions-related risks, including transactions involving sanctioned individuals, entities or restricted jurisdictions.

Where relevant to the business relationship, Third Parties should promptly disclose circumstances that may create sanctions, export control or trade compliance concerns.

Conflicts of Interest

Third Parties are expected to avoid situations where personal interests could interfere, or appear to interfere, with objective business decisions.

Any actual, potential or perceived conflict of interest involving Greenvolt employees, representatives or decision-makers should be disclosed promptly, via the channels mentioned above.

3.Human Rights and Fair Working Conditions

Greenvolt is committed to respecting internationally recognized human rights conventions and expects Third Parties to respect the dignity, rights and wellbeing of all individuals affected by their activities.

Third Parties should provide fair and respectful working conditions and ensure that employment practices comply with applicable labour laws and regulations. Forced labour, slavery, human trafficking, coercive employment and child labour are prohibited. All work must be voluntary, and workers must not be subject to recruitment fees, retention of identity documents or restrictions on freedom of movement.

	Third Party Code of Conduct	CO: 3	
Group		Revision: 00	10-09-2026

Third Parties should promote equal opportunity, prevent discrimination, harassment and abusive conduct, comply with applicable requirements on wages, working hours and employment conditions, and respect employees' rights to freedom of association and collective bargaining where they are permitted by law.

Implementation may vary according to geography, business size and risk profile, but Third Parties should take proportionate steps to identify, prevent, address and, where appropriate, remediate human rights and labour risks in their operations and supply chains. Concerns relating to these matters should be raised and addressed in good faith, without retaliation, through appropriate internal or Greenvolt reporting channels.

4. Health and Safety

Greenvolt believes that all workers have the right to perform their duties in a safe and healthy environment.

Third Parties are expected to manage health and safety risks responsibly and take appropriate measures to protect workers, visitors and any other persons who may be affected by their activities. This includes complying with applicable health and safety laws and regulations, identifying and managing workplace hazards, promoting safe working practices, providing appropriate training and supervision, ensuring suitable protective equipment is provided and used where required, and taking reasonable measures to prevent accidents, injuries and occupational illnesses.

Third Parties should ensure that all workers are appropriately trained and qualified for the activities they perform and are encouraged to report concerns and stop unsafe work without fear of retaliation.

Greenvolt encourages a proactive approach to health and safety focused on prevention and continuous improvement.

5. Environment and Sustainability

As a company operating in the renewable energy sector, Greenvolt seeks to minimize environmental impacts and promote sustainable business practices across its value chain.

Third Parties are expected to conduct their activities responsibly and in accordance with applicable environmental laws and regulations. They should use natural resources efficiently, prevent pollution and environmental harm, manage waste responsibly, and take reasonable steps to reduce adverse environmental impacts associated with their operations.

Where relevant to their activities, Third Parties should consider impacts on air, water, soil, biodiversity and ecosystems, manage hazardous substances safely, improve energy efficiency and support the reduction of greenhouse gas emissions. Third Parties should also seek to prevent unnecessary adverse impacts on local communities and other stakeholders affected by their activities.

Greenvolt recognizes that the scale and complexity of environmental practices may differ among Third Parties. However, all organizations should demonstrate a commitment to responsible and sustainable operations and continuous improvement in environmental performance.

6. Information Protection and Cybersecurity

Greenvolt values the protection of information, personal data and business assets. Third Parties that access Greenvolt information or systems must protect confidential and proprietary information, comply with applicable privacy and

 Group	Third Party Code of Conduct	CO: 3	
		Revision: 00	10-09-2026

data protection laws, and use information only for legitimate business purposes and in line with contractual requirements.

Third Parties should apply appropriate technical and organizational measures to safeguard Greenvolt information, personal data and systems against unauthorized access, use, disclosure, alteration or loss. They must notify Greenvolt without undue delay of any significant actual or suspected incident that may affect Greenvolt information, personal data or systems, and cooperate reasonably in addressing it.

7. Raising Compliance Questions and Concerns

Greenvolt encourages an open and transparent culture in which concerns can be raised in good faith without fear of retaliation.

Third Parties and their employees and contractors should report suspected misconduct, legal violations or breaches of this Code through Greenvolt's available reporting channels, including the Whistleblowing Channel where appropriate.

Greenvolt does not tolerate retaliation against any individual who raises concerns in good faith or participates in an investigation.

Third Parties are also expected to cooperate reasonably with Greenvolt when reviewing or addressing compliance-related concerns connected to the business relationship.

8. Consequences of Failure to Comply

Greenvolt expects Third Parties to act consistently with the principles described in this Code and to address any identified gaps or deficiencies in a timely manner.

Greenvolt may request information that is reasonably necessary to assess compliance with this Code, considering the nature of the relationship and associated risks.

Where non-compliance is identified, Greenvolt may request corrective actions and monitor their implementation. In cases of serious or persistent non-compliance, Greenvolt may reconsider, suspend or terminate the business relationship, subject to applicable contractual arrangements and legal requirements.

9. Accurate Records and Transparency

Third Parties shall maintain complete, accurate and reliable records relating to their business activities. Business records, financial information and operational data shall be prepared honestly and retained in accordance with applicable legal and contractual requirements.

Information provided to Greenvolt during procurement, qualification, audits or contract management activities shall be accurate, complete and submitted in a timely manner.

Any intentional misrepresentation, concealment of information or falsification of records is incompatible with this Code.

	Third Party Code of Conduct	CO: 3	
Group		Revision: 00	10-09-2026

10. Related Policies

This Code should be read in conjunction with any other publicly available Greenvolt policies, standards, codes, statements, and governance documents that may be relevant to a Third Party's activities and relationship with Greenvolt.

Such documents may include, without limitation, materials relating to ethics, compliance, anti-bribery and corruption, human rights, sustainability, data protection, cybersecurity, and responsible business conduct. Third Parties are expected to familiarize themselves with and comply with any applicable requirements contained in such documents, as updated from time to time. The latest versions of these materials are available on Greenvolt's official website or may be provided upon request.

	Third Party Code of Conduct	CO: 3	
Group		Revision: 00	10-09-2026

Acknowledgment

By signing below, I acknowledge that we have read and understand the Code and agree to comply with its provisions.

Company Name

Name/ Title

Date

	Third Party Code of Conduct	CO: 3	
Group		Revision: 00	10-09-2026

Document control log

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