

Code of Ethics and Conduct of the GreenVolt Group

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01 Message from the CEO

The GreenVolt Group, owned by GreenVolt - Energias Renováveis, S.A. and comprised of its subsidiaries, is proud to guide its entire strategy and actions based on the highest principles of ethics, transparency and sustainability.

Our leadership is based on the values we uphold, with the belief that all decisions and business relationships should be guided by integrity, transparency and honesty. This is why we expect all our employees, partners and other stakeholders to share this vision, and to be guided by the same principles.

GreenVolt's Code of Ethics and Conduct aims to establish the necessary guidelines for the best decision-making, conduct and attitudes on the part of the Group's employees, regardless of their job position or function, based on ethical principles shared by all. We expect everyone to fully comply with it at all times, and will not allow any type of breach to the rules and principles established herein.

Any irregular situation that comes to our attention will be treated in a fair and equitable manner, but will also be assessed thoroughly. We want to continue to grow in a sustainable and committed manner, ensuring that all our stakeholders are aware of the GreenVolt Group's values, and guiding their conduct based on the principles of this code, with a proactive and

responsible approach. We want to reduce the environmental impacts associated with our business to an absolute minimum, while fully respecting the principles and rules of an ethical nature set out in this code and its supplementary policies and regulations, as well as the values designed and established by international entities such as the United Nations Global Compact, to which we are proud to be signatories.

The success of GreenVolt's planned strategy depends on assertive individual decisions and integrity in day-to-day life, reflecting our values and serving as an example of excellence and rigour in individual conduct and, as a result, the conduct of the Group. We are counting on everyone's commitment to fulfilling this mission, always with the unwavering goal of continuous improvement, at the highest ethical levels that guide the GreenVolt Group's conduct.

João Manso Neto
Chief Executive Officer



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Goals of the Code

The Code of Ethics and Conduct (“Code”) of GreenVolt - Energias Renováveis, S.A. (hereinafter “GreenVolt” or “GreenVolt Group”) reflects the set of principles and rules that should guide the internal and external relationships of GreenVolt Group companies with their stakeholders.

The Code was created with the aim of sharing these principles and rules, promoting and encouraging their adoption by the Group’s employees, regardless of their job position or function.



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Scope of application

This code applies, regardless of function, geographical location or functional reporting, to all GreenVolt Group employees (hereinafter abbreviated and jointly designated as “Employees”), as well as – with the necessary adaptations – to representatives, external auditors, customers, suppliers and other persons who provide services to them in any capacity, whether permanently or sporadically (hereinafter all abbreviated and designated as “Partners”).

This code and all the policies and regulations supplementing it, shall also apply to all GreenVolt Group companies.

Its application shall not impede or dispense with any applicable rules of a legal or other nature, namely ethical rules applicable to certain functions, activities or professional groups.

In the event of a discrepancy between the principles and rules described in this code and the principles established in specific codes of conduct or applicable legal precepts, the ethical rules described in the latter shall prevail.

Each leader is responsible for the conduct of his/her subordinates and for providing guidance, in case of doubt, on the application of this code.

04 What makes us different?

Ambition



To lead the production of energy from renewable sources, helping to fight climate change and promote a more balanced and sustainable world from an environmental, social and economic perspective.

Mission



We exist because we believe in a world driven by sustainable, socially responsible and technologically innovative energy solutions.

Vision



To play a leading role in the global transformation in energy production for a more sustainable and healthier future.

Values

Integrity, transparency and honesty are part of every decision-making process, and relationships with all our stakeholders are guided by criteria of loyalty, rigour and good faith. Our work is governed by four core values:

Agility

We navigate fast-paced environments and adapt quickly to new conditions and challenges. We make decisions, delegate and collaborate in an agile way.

Ambition

We are bold and dare to risk, discover, test and fail. We are resilient and strive to achieve meaningful results.

Empowerment

We solve complex problems for a sustainable future. We take ownership and hold ourselves accountable, executing locally.

Team Spirit

We use the full power of our diverse global team and bring, to each challenge, the combination of our people, strengths and capabilities.



05 Ethics and Sustainability Committee

We are serious about our commitment to ethics, conduct and sustainability assumed with our employees, partners and the communities where each Group company does business.

Because this commitment is one of the cornerstones of our experience, we have an Ethics and Sustainability Committee that works in direct coordination with the Board of Directors, and which is responsible, among other tasks, for:

- (i) monitoring and verifying the proper interpretation and implementation of GreenVolt's compliance system;
- (ii) preventing, detecting and investigating behaviour in breach of the code and/or other codes used by GreenVolt, and the respective regulations supplementing and/or related to them; and
- (iii) serving as the recipient of reports on any infractions to the rules of GreenVolt's codes and regulations.

The Ethics and Sustainability Committee operates according to its Internal Regulations, available at www.greenvolt.pt

All GreenVolt employees must act in accordance with this code. If you become aware of any suspected non-compliance or evidence thereof, you should immediately report the situation to the Ethics and Sustainability Committee, or use the reporting channel available at www.greenvolt.pt.

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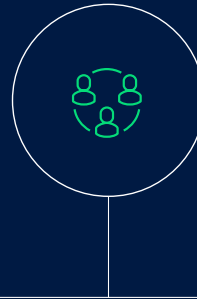
Principles and Rules of Operation

The principles and rules of action contained in this code are divided into **ethical and conduct commitments** for the following:



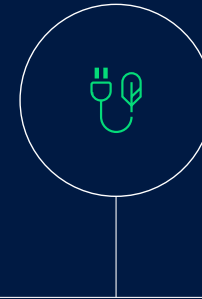
Employees

Commitments that establish how the GreenVolt Group relates to its employees, how it expects them to relate to each other and everyone's shared attitude towards the business.



Stakeholders

Commitments of an institutional and individual nature that the GreenVolt Group and its employees must respect in their relations with their stakeholders, with rigour and transparency, and in accordance with their needs and specificities.



Business

Commitments to develop and integrate means of managing the business with integrity and transparency.

Part I – Employees

6.1 The Company's Commitments to its Employees

GreenVolt is committed to its employees:

Diversity, Equality and Inclusion

- To adopt and implement policies, practices and processes that promote the principles of diversity, equality and inclusion in the GreenVolt Group, and which value the different opinions, characteristics and values of each person as a driver of innovation, creativity and development;
- To base the Human Resources Policy on respect for people, in every phase from recruitment to proper remuneration, decent working conditions and retirement;
- To affirm and disseminate a diverse and inclusive culture that does not discriminate, respects the rights of each person and includes everyone regardless of ethnicity, race, colour, creed, religion, nationality, age, disability, gender, sexual orientation, family situation, marital status, political or ideological beliefs, union membership or any other legally protected status, and other visible and non-visible characteristics;
- To promote equal opportunities through flexible and conciliatory work models, training and professional and personal development, talent promotion and other aspects;

- To treat each employee fairly, namely through a rigorous, transparent, constructive and merit-based performance evaluation;
- To encourage communication, the free expression of opinions and sharing of information among employees;
- To promote a team spirit, the sharing of common goals and mutual help among employees;
- To act in accordance with the recommendations of international organizations, in particular those emanating from the International Labour Organization, seeking to go beyond established international standards;
- To comply with the provisions of international conventions ratified by Portugal, namely on freedom of association, the prohibition of child labour and slavery, ensuring that GreenVolt's internal policies and regulations reflect this stance, requiring equal practices from all our stakeholders.

Repudiation of Harassment

- To prevent and repudiate any type of harassment or any other form of attack on the dignity of its employees or people with whom they have a relationship.

Occupational Health and Safety

- To create a healthy and inclusive work environment and ensure compliance with applicable individual and collective health and safety standards to protect against occupational risks and promote employee health;
- To promote employees' health and well-being, respecting the balance between professional, personal and family life.

Associativism

- To value and recognize freedom of expression and freedom of association as differentiating factors and drivers of innovation;
- To ensure that GreenVolt employees participate freely and proactively in various forums, whether of a labour, cultural, environmental, social or any other nature, and encourage their participation in associations and discussion forums.

Privacy

- To ensure the privacy of employees' personal data.

6.2 Commitments of our Employees

GreenVolt employees guide their conduct according to the following commitments:

- Strict compliance with the law, regulations, recommendations and the provisions of the articles of association, as well as with the internal rules, policies and guidelines of the GreenVolt Group;
- Acting in a loyal, responsible and uncompromising manner towards the Group, ensuring conduct that best safeguards the Group's interests and protects its reputation at all times;
- Cooperating with all areas of the Group to provide objective, factual, complete and true information and knowledge, without omissions or restrictions;
- Cooperation and professionalism in relations with partners and the local communities where each GreenVolt Group company is found;
- High awareness of the need to treat all information produced, or made accessible to them in the course of their duties, as confidential;
- Diligent and parsimonious treatment of all work instruments and assets of GreenVolt Group companies, ensuring their protection and proper state of upkeep, and refraining from any use for personal benefit;
- Adopting individual behaviour that helps to minimize the environmental impact of GreenVolt's business, namely through the rational use of resources in the workplace, the reuse of materials and waste separation);
- Respecting the health and safety standards applicable to the activities for which they are responsible.

What is meant by harassment in the workplace?

Harassment may be psychological (bullying) or sexual, and may take place at the time of accessing employment, on the job itself or off the job, provided there is a connection to it.

Bullying is a repeated or persistent set of acts or behaviours for the purpose or effect of disturbing or embarrassing a person, affecting their dignity or creating an intimidating, hostile, degrading, humiliating or destabilizing environment.

Bullying may - or may not - originate from any discriminatory factor, namely gender, sexual orientation, age, religion, ethnic origin or race, nationality, language, education, family or economic situation, origin or social condition, reduced capacity

to work, disability, chronic illness, political or ideological beliefs and trade union or other affiliation.

Sexual harassment is defined as unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of embarrassment, intimidation or humiliation as described above.

Behaviour or conduct corresponding to the legitimate exercise by the employer of the powers to which it is entitled by law - namely managerial, hierarchical and disciplinary powers - does not constitute harassment.

6.3 Commitments between Employees

GreenVolt Group employees undertake to:

- Act with cordiality (including with partners) and mutual respect, according to rules of courtesy and appropriate treatment among all;
- Interact with each other and with others (including partners) in a way that is honest, cooperative and clear in communication, contributing towards a positive working environment, productivity and teamwork;
- Know how to correct and be corrected, promoting quality and the continuous improvement of the Group's business;
- Prioritize an informal atmosphere, while knowing how to respect hierarchy;
- Repudiate and report harassing behaviour, in accordance with the provisions of this code.



Part II – Stakeholders

6.4 Commitments to Partners

- To comply with and enforce contractual obligations assumed, upholding a relationship of proper customs and best business and ethical practices with partners in terms of professionalism, respect and loyalty;
- To choose partners on the basis of objective, clear and impartial criteria, in line with the guidelines established by the Group in the Sustainable Procurement Policy, and to disclose them in a transparent manner;
- To require all suppliers to agree to the Supplier Code of Conduct, which sets the minimum standards of conduct required from all those with whom we initiate and continue any type of business relationship, and to promote compliance with it;
- To ensure that contracts with partners include information related to the repudiation of abusive practices at work and compliance with legal norms emanating from International Conventions on labour matters, and to require compliance with the Supplier Code of Conduct;
- To promote the best environmental and social practices in their business, and to ensure that they meet the ethical standards set out in this code;
- To respect the confidentiality of information and the intellectual property of partners, namely as regards proposals and estimates.

6.5 Commitments to Shareholders and the Market

- To conduct our business in a clear and consistent manner, with the aim of creating value, promoting excellence in our work and achieving the goals we have set for ourselves;
- To adopt the principle of transparency and the safeguarding of legitimate expectations in relations with shareholders, investors, other stakeholders and the market;
- To guarantee principles of equal treatment and appreciation of shareholder investment, including means of protecting minority shareholders;
- To guarantee the accuracy, veracity and expediency of information disclosed to shareholders and the market;
- To ensure the disclosure of financial, corporate governance and non-financial information in a complete, true, current, lawful, clear and objective manner;
- To properly manage resources, reinforcing the GreenVolt Group's proactive role in promoting a sustainable and differentiated business model.

6.6 Commitments to the Competition

- To require all GreenVolt Group employees to comply with applicable national and international rules on competition, ensuring that competition between companies belonging to the Group and companies operating in the same market is healthy and fair;
- To refrain from anti-competitive practices, acts of unfair competition and restrictive trade practices, including but not limited to price fixing, the exchange of confidential or commercially sensitive information, coordination with competitors and discrimination involving customers and suppliers;
- To comply with rules for the defence of competition, with the prohibition of any conduct that prevents, distorts or restricts free competition or contradicts applicable law in this regard;
- To respect the rules of cordiality and mutual respect governing the relationship with our competitors, with the prohibition of any conduct that may be construed as slander or defamation of competitors or their representatives;
- To respect market rules, and to refrain from promoting or participating in any type of activities that violate or threaten to violate elementary ethical or competitive rules, or that aim to obtain illegal advantages over competitors.



6.7 Commitments to public entities, institutions and other third parties

- To cooperate with public authorities, institutions and local communities, with rules of transparency and independence, always with full willingness and openness to participate in all forums aimed at greater integration between GreenVolt Group companies and the communities where they do business, while creating value with a positive impact;

- To promote a spirit of cooperation, collaboration and respect in relations with public and supervisory authorities, refraining from any behaviour that impedes the performance of their respective tasks;
- To provide public authorities with the cooperation needed to carry out their activities, namely by making requested information available in a timely manner;
- To preserve GreenVolt's independence vis-à-vis public institutions and political parties, without prejudice to business relations related to the sale of products or services.

6.8 Commitments to Society and the Environment

- To conduct the GreenVolt Group's business in line with the principles of the Sustainability Policy and Strategy, which are fundamental to the implementation of a sustainable development model, focused on social progress, environmental balance and economic development, to create long-term value and prosperity for all stakeholders;
- To respect and promote human rights, in accordance with commonly accepted principles, standards and international laws, such as the United Nations Global Compact, Universal Declaration of Human Rights and the Declaration on Fundamental Principles and Rights at Work, ensuring that all partners in our value chain are aware of them and respect them as well;

- To promote a society based on mutual respect and equal opportunities, namely by offering solutions that enable a fairer and more democratic energy transition for families and companies;
- To contribute towards the socio-economic development of the communities where we do business, assuming a commitment to social development with them;
- To adopt and implement social responsibility practices, and to contribute positively towards the quality of life of employees and their families, as well as other people and entities in the communities where we do business, in line with GreenVolt's Social Responsibility Strategy;
- To implement initiatives to support and develop employees and the local communities where we are found, by engaging employees and partners;
- To adopt the best environmental practices, minimizing the environmental impacts of the Group's business, through the streamlined use and efficient management of natural resources, promoting the circular economy, mitigating impacts on biodiversity and ecosystems, boosting the energy efficiency of operations, reducing GHG emissions in its own operations and in the value chain, and proactively combating climate change;
- To invest in environmentally friendly technologies and knowledge innovation, to aspire to leadership and excellence in the development and operation of renewable energy production projects.

Part III – Business

6.9 Business Integrity

- To strictly comply with legislation and regulations applicable to GreenVolt's business;
- To respect suppliers, business partners and other stakeholders with professionalism, respect and loyalty, and to honour the commitments made with them;
- To demand from all employees an uncompromising attitude towards any conduct that is, or may appear to be, fraudulent and/or that may constitute or indicate ways of doing business that are not completely transparent and honest;
- To compete on the basis of quality and meritocracy criteria, and to position ourselves in the market as an entity that believes and acts in competitive processes, and makes decisions with integrity and fairness;
- To strictly comply with competition laws and/or regulations, whether national, EU or international;
- To respect market rules and criteria, promoting healthy and fair competition and avoiding any practices that may impede, distort or restrict competition.

6.10 Prevention of Fraud and Corruption

- To repudiate the practice of any corruption or bribery, whether actively or passively, and other forms of undue influence, in all of GreenVolt's internal and external relationships;
- To comply with all applicable national and international standards of fraud prevention and anti-corruption, and require everyone to unequivocally affirm conduct of integrity, honesty and transparency;
- The acceptance of advantages in return for the preferential treatment of any third party is forbidden; only offers that conform to socially appropriate conduct, practices and customs may be accepted. Any offers made to any Group employee must be politely declined whenever they are intended to influence - or create the appearance of influencing - the existing professional or business relationship;
- Offering or accepting cash, cheques and other legally restricted goods, under any circumstances and regardless of value, is prohibited;
- To refrain from influencing an action or decision in any illegal way, including by accepting or offering any advantage, which appears to contradict the applicable rules in this area.

6.11 Political Contributions

- To respect and allow all political opinions, while also allowing individual employee participation in the political process and in fund-raising campaigns;
- To prohibit donations or political contributions on behalf and/or in the name of any GreenVolt Group company, or in a manner that appears to be made on behalf or in the name of any Group company. Any donation or loan of a monetary nature or in kind to political parties done individually by an employee connected, in any capacity, to any company of the GreenVolt Group must unequivocally be made individually, and without having or potentially having the suspicion of any relationship, connection or confusion with the GreenVolt Group or any company belonging to it.

6.12 Money Laundering

- To strictly comply with national and international legal provisions applicable to the prevention of money laundering;
- The conversion or transfer of any assets derived from illicit acts or assets obtained therefrom, for the purpose of transforming

them into legally reusable capital, concealing their illicit origin or avoiding the identification and prosecution of the persons involved in the illicit activity, is prohibited;

- Aiding or facilitating any conversion or transfer, as referred to in the preceding paragraph, is prohibited;
- The acquisition, possession or use of property which, at the time of its receipt, is known to be derived from criminal activity or from participation in such activity, regardless of the type of crime, is prohibited;
- Participating in any of the acts referred to above, being associated with committing such acts or attempting to commit them, being an accomplice to such acts, or facilitating their execution or advising someone to commit them, is prohibited;
- To ensure that the company's financial records are properly maintained and managed for the purpose of controlling GreenVolt's activity in this area.

6.13 Conflicts of interest

- To assume conduct of integrity, loyalty and transparency towards GreenVolt, avoiding any situation or activity parallel to those of GreenVolt that could lead to a conflict of interest;
- To refrain from intervening in processes from which a potential conflict of interest may arise, namely in cases of kinship or friendship;
- To refrain from acting, at all times, on the basis of one's own or a third party's motivations and interests, whenever this may compromise GreenVolt's interests.

6.14 Information protection

- To ensure the confidentiality, privacy and integrity of information of the GreenVolt Group, every employee and our customers to which employees have access over the course of their activities;
- To keep all information of this kind confidential, as well as maintaining and preserving the company's records, which must always be up-to-date, reliable, complete and factual;
- To refrain from disclosing or sharing any internal GreenVolt Group documentation with third parties, when not previously authorized by the competent body for this purpose;
- To refrain from transmitting, to any unauthorized third parties, data to which they have access over the course and as a result of their duties, in particular the disclosure of information regarding personal data, production methods and the business;
- To refrain from disclosing inside information that may affect the price of securities representing GreenVolt's share capital, or making use of information classified as such, advising or carrying out transactions, on one's own behalf or on behalf of third parties, directly or indirectly, related to GreenVolt's securities (or financial instruments) listed on a regulated market;
- To refrain from using inside information for one's own benefit or for the benefit of third parties, including those no longer working with GreenVolt, for any reason;
- To keep all information of this kind confidential, as well as maintaining and preserving the company's records, which must always be kept up-to-date, reliable, complete and factual.



What is the meaning of assets derived from committing of illicit acts?

“Assets derived from committing illicit acts” is defined as benefits resulting from committing the crimes of pimping, sexual abuse of children or dependent minors, extortion, trafficking in narcotics and psychotropic substances, arms trafficking, trafficking in human organs or tissue, trafficking in protected species, tax fraud, influence peddling, corruption, and crimes punishable by a prison sentence of more than six months (minimum) or more than five years (maximum), among others expressly provided for in applicable national and international legislation.

6.15 Record keeping

- To record all relevant activities, operations or business deals carried out by or involving GreenVolt, using the appropriate medium, in a complete, reliable manner reflecting all relevant aspects of the situation in question;
- To keep records consistently, respecting all applicable legal requirements and for the retention time required by law;
- Modifying or altering company records or documents, or removing or destroying records or documents before the date specified in the document, is prohibited.

6.16 Privacy and personal data

- To protect all data at the company with appropriate levels of security, and to ensure that it is carefully retained only for the purposes permitted by law;
- To require, from everyone, ongoing compliance with the rights and obligations set out in the Group's Privacy Policy, which should be consulted regularly;
- All processing of personal data must comply with the company's privacy policy.

What is meant by conflict of interest?

A conflict of interest is defined as any situation in which an employee has an economic or personal interest in an interaction that may adversely affect the organization and, in the particular case of the members of governing boards, any fact that affects, or may affect, their independence in decision-making.

A conflict of interest exists when **(i)** an employee's or partner's private interest interferes, or appears to interfere, in any way with the interests of the company as a whole, and/or **(ii)** an employee or partner, or their close family members or friends, receive an improper personal benefit as a result of that employee's or partner's position in the company.

When can a conflict of interest exist?

What should be done in a situation that may raise a potential conflict of interest?

When faced with a potential conflict of interest, employees and partners should:

- (a)** inform their direct supervisors, in writing, of the conflict of interest in which they are or may be involved, before undertaking any transaction or concluding the business in question;
- (b)** refrain from (i) intervening in or influencing, directly or indirectly, any decisions that may affect entities with which there may be a conflict of interest, and (ii) participating in meetings where such decisions are being discussed or confidential information affecting the conflict is being assessed;
- (c)** in the particular case of corporate board members, a member in this situation, in accordance with applicable legal provisions and this policy, will be prohibited from participating and voting in the decision-making process in question, and must provide any clarifications that the company requests in this regard. A description of the impediment and a reference to the member's abstention from the decision-making process in question must be expressly included in the minutes of the meeting where the said process took place.



6.17 Intellectual Property Rights

- To protect the intellectual property of GreenVolt Group companies, namely patents, trademarks, know-how, industrial secrets concerning operations or technology, and copyrights;
- To refrain from infringing on, to the extent of the Group's capabilities, and to protect the intellectual property rights of partners and other entities with whom the company interacts.

What is meant by confidential information?

Confidential information is any and all information related to GreenVolt and its business, specifically including knowledge or information about GreenVolt's business dealings, legal matters, contingencies and liabilities, processes, products, manufacturing methods, formulas, information related to customers, prices, costs, know-how, production, compositions, services, strategic and business planning, financing, data processing, engineering, inventions and discoveries, data of a financial nature or related to the organizational structure of the GreenVolt Group, as well as any internal information or information related to the business of GreenVolt Group companies which would be considered confidential according to the judgement of any reasonable person, together with information which, being made public, would be capable of having a sensitive influence on GreenVolt's share price or the value of any transaction in which GreenVolt is involved

(the foregoing being jointly referred to as "Confidential Information").

Greenvolt's confidential information belongs exclusively to the company, and may not be appropriated or used by any employee or partner in their own personal interest or to the benefit of third parties, even when they no longer work, for any reason, with Greenvolt.

The obligations of secrecy and confidentiality shall not exist when the information is in the public domain or is publicly known, for any reason other than the breach, act or omission of the employee who had access to it, or when the employee received access to the confidential information through a third party not subject to secrecy obligations, and without any breach of these rules.



What is meant by records?

The term “records” includes records in any possible format, such as documents, recordings, photographs, computer files, voice recordings and email.

The maintenance and integrity of our corporate records and documents, including but not limited to financial and accounting documents, are principles of conduct that we honour and preserve at all times.

What is meant by personal data, data processing and data controller?

- **“Personal Data”**: Information, regardless of its nature or medium, related to an identified or identifiable person (the “Data Subject”);
- **Data Processing**: any operation involving Personal Data, with or without automated means. The collection, recording, organization, retention, alteration, consultation, use or any other means of disclosure of data, with comparison or interconnection, or the blocking, erasure or destruction of data, are considered Personal Data processing operations;
- **Data Controller**: the person, company, authority, agency or other body that determines the purposes and means of Personal Data processing.

The use of email addresses or the creation of contact lists, the sending of newsletters or marketing communications, (just to mention a few examples) when not authorized, may constitute a breach of data protection rules.



07

Compliance with the Code

The Code of Conduct must be read carefully by all employees.

GreenVolt expects all its employees to behave in a dignified and professional manner. Everyone shall be obliged to comply with the internal rules contained herein and in the other documents that supplement this code, such as policies and regulations. Only in this way will we be able to continue to fulfil our purpose and constantly improve what we are today.

Any failure to comply with the code, GreenVolt's internal policies and procedures or other legal or corporate standards, may lead to serious consequences for GreenVolt, potentially constituting a disciplinary offence and/or a breach of contract, which the company will not fail to punish under the law. The

measures to be adopted may entail changes in procedures, training needs and potential disciplinary penalties, appropriate and proportional to the offence committed, or even civil and/or criminal liability of the employee, from a contractual or legal source, to GreenVolt Group companies or third parties. In the case of partners, any failure to comply with the rules set out in this code may constitute grounds for the application of penalties and/or the discontinuance of the business relationship.

GreenVolt provides suitable employee training on all matters governed by the Code of Ethics and Conduct and by the policies and regulations which supplement and/or are related to it.



08 Whistleblowing

All employees, partners, suppliers and other stakeholders shall be obliged to report to the company with regard to any act of which they become aware constituting a breach to this code, through the reporting channel provided in the Whistleblowing Policy.

The Ethics and Sustainability Committee, at its discretion, will investigate any suspected breach of this Code of Conduct, related company policies and procedures or legal rules.



09 Disclosure

The Code of Ethics and Conduct is distributed to all employees and partners, and is published at the website www.greenvolt.pt.

From a standpoint of continuous improvement, the Code of Ethics and Conduct and other internal rules that make up the compliance program must be considered dynamic regulatory instruments, and may be subject to sporadic revision and amendment. Whenever this occurs, any revisions and/or amendments made at any given time will be made known.

