



Whistleblowing Policy

Shaped
— by Nature

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Whistleblowing Policy

GreenVolt — Energias Renováveis, S.A. (“GreenVolt” or the “Company”) strives for an organizational culture of transparency, based on the highest ethical standards of conduct, through the establishment of channels that, guaranteeing anonymity and confidentiality of communication, allow all workers, members of governing bodies and service providers to report irregularities and infractions known to them.

1. Objective Scope of Application

- 1.1. The purpose of this policy (the “**Policy**”) is to define the rules and internal procedures for the receipt, processing and handling of Complaints made within all companies owned by GreenVolt (“**GreenVolt Group**”).
- 1.2. For the purposes of this Policy, it is considered to be:
 - (a) Infringements, any act or omission contrary to the rules contained in the acts of the European Union referred to in the Annex to Directive (EU) 2019/1937 of the European Parliament and of the Council, national rules implementing, transposing or complying with such acts, or any other rules contained in legislative acts of execution or transposition thereof, including those that provide for crimes or offenses, relating to the areas identified in Annex II to this Policy (“**Infractions**”); and
 - (b) Irregularities, all acts or omissions that, although not falling within the definition of Infringement, are contrary to the law, regulations, and recommendations, national, European, international, or internal to the company, including, without limitation, in the areas of accounting, auditing, internal control and anticorruption; and financial crimes of any kind (“**Irregularities**”).

2. Subjective scope of application

This Policy applies to all natural persons who have access to information, within the scope of their professional activity, regardless of the nature of this activity and the sector in which it is carried out, in relation to the GreenVolt Group.

3. Principles

This Policy is governed by the following principles:

3.1. Confidentiality of the Identity of the Whistleblower and the Target Person

The identity of the Whistleblower and the Target Person, as well as the information that may allow their identification, are of a confidential nature and are restricted to the persons responsible for receiving and/or following up the complaints. The confidentiality obligation applies to all persons who have received information about the complaints.

The identity of the Whistleblower and the Referred Person may only be disclosed as a result of a legal obligation or a court decision and is preceded by written communication to the Whistleblower and/or the Target Person stating the reasons for disclosure, unless the provision of this information compromises the investigations or related court cases.

3.2. Safekeeping

Complaints submitted under the Policy are subject to registration and safekeeping for a period of 5 years and, regardless of that period, pending judicial or administrative proceedings regarding the complaint, without prejudice to special rules on the protection of personal data, in particular, data retention, provided for in internal policy.

3.3. Precedence of the Internal Complaint

Since there is an Whistleblower Channel, as a rule, the Whistleblower cannot previously use external complaint channels.

3.4. Prohibition of Disclosure

As a rule, the Whistleblower may not publicly disclose an Infraction or an Irregularity or inform the media or the journalist of it and does not benefit from the protection afforded by the Policy, except in cases legally provided for.

3.5. Prohibition of Retaliation for Reporting Infractions

In cases of complaints for Infractions, the Whistleblower, the Whistleblower's Assistant and the legal persons or similar entities that are owned or controlled by the Whistleblower, for which the Whistleblower works or is otherwise connected with in a professional context, may not be subject to Acts of Retaliation.

The following acts, when performed up to two years after a complaint or public disclosure of an Infringement, are presumed to be motivated by the same Complaint, until proven otherwise:

- i. Dismissal;
- ii. Changes in working conditions, such as duties, hours, place of work or remuneration, failure to promote the worker or non-fulfillment of labor duties;
- iii. Suspension of the employment contract;

- iv. Negative performance evaluation or negative reference for employment purposes;
- v. Failure to convert a fixed-term employment contract into an open-ended contract, where the employee had legitimate expectations of that conversion;
- vi. Non-renewal of a fixed-term employment contract;
- vii. Inclusion in a list, based on a sectoral-wide agreement, which may lead to the impossibility of the whistleblower finding a job in the sector or industry in question in the future;
- viii. Termination of a supply or service contract.

Any disciplinary sanction applied to the Whistleblower and the Whistleblower's Assistant up to two years after the filing of a complaint or public disclosure is presumed to be abusive.

3.6. Whistleblower's responsibility

The Whistleblower cannot be held disciplinary, civil, administrative offense or criminally responsible for the denunciation or public disclosure of an Infraction made in accordance with the Policy.

The Whistleblower cannot be held responsible for obtaining or accessing the information that motivates the complaint or public disclosure, unless obtaining or accessing it constitutes a crime.

3.7. Processing of personal data

The purpose of processing the information communicated under this Policy is the receipt and follow-up of complaints submitted in the Whistleblower Channel, and personal data that are manifestly not relevant to the treatment of the Complaint will not be retained, which will be immediately deleted.

The right to information is guaranteed, in accordance with the legally provided terms, namely in relation to the entity responsible for receiving and processing the complaint, the facts reported and the purpose of processing the information received, as well as the right to access and rectify your personal data.

Under the data protection and information security rules (General Data Protection Regulation 2016/679 and Law 58/2019) adequate security measures must be provided to protect the information and data contained in the Complaints and the corresponding records.

4. Complaints procedure

- 4.1. The Responsible for the Whistleblower Channel must ensure the receipt and forwarding of the Complaints to the competent corporate structures, depending on the matter of the respective Infringement or Irregularity, being responsible for their registration and treatment, without prejudice to the responsibilities of the Responsible for the Whistleblower Complaint regarding the monitoring of the treatment of complaints according to the following numbers.

- 4.2. Within** 7 days of receiving a Complaint on the Whistleblower Channel, the Responsible for the Whistleblower notifies the Whistleblower of its receipt with information on the requirements, relevant authorities, form, and admissibility of the external complaint, pursuant to Law No. 93/2021, of 20 December December.
- 4.3. Within** 2 months of receiving a Complaint in the Whistleblower Channel, the relevant corporate structure shall produce a written document containing the analysis made to the Complaint, a description of the internal acts performed and the conclusions reached, including, if understood, the opening of an investigation internal or communication to the relevant authority for the investigation of the Infringement or Irregularity.
- 4.4. Within** 3 months of receiving a Complaint in the Whistleblower Channel, the relevant corporate structure informs the Whistleblower of the follow-up given to the Complaint and the actions and measures implemented to address the facts and information reported therein.
- 4.5. The** Whistleblower may request that the result of the analysis carried out to the Complaint be communicated to him within 15 days of its conclusion.
- 4.6. If** an internal investigation is opened, once all the investigation procedures carried out in the investigation have been completed, a report shall be drawn up detailing the reported case, the steps taken within the scope of the investigation, as well as the measures taken to mitigate the identified risk and prevent the recurrence of Reported infractions or irregularities.
- 4.7. The** Responsible for the Whistleblower Channel and the corporate structures to which he/she forwards the Complaints for treatment may be assisted by internal or external persons designated by them, and these persons are bound by the applicable duty of confidentiality.

5. Final Provisions

- 5.1. This** Policy shall enter into force on the date of its approval by the Board of Directors.
- 5.2. Any** amendment to this Policy must be approved by the Board of Directors, with the power of delegation to the Delegated Administrator, regarding the changes necessary to conform the Policy with the legislation in force at any time.
- 5.3. This** Policy is subject to disclosure to the GreenVolt Group, in compliance with the following rules:
- a)** in the case of companies wholly controlled by GreenVolt, the respective management bodies must carry out the local transposition and the respective disclosure of this Policy;
 - b)** in the case of companies in which GreenVolt exercises control, co control (Joint Ventures) or Significant Influence (Associates), the representatives of GreenVolt attending in the management body shall, for the purpose of exercising control, co-control, or Significant Influence, promote the adoption of the necessary measures for local transposition and the respective dissemination of this Policy;
 - c)** in the case of companies in which GreenVolt does not exercise significant control or influence, GreenVolt representatives should observe the provisions of this Policy in the performance of their respective functions and, to the extent possible, encourage the adoption of rules and procedures consistent with this Policy.

ANNEX I

DEFINITIONS

For the purposes of this Policy, the following terms and expressions will have the following meaning when they begin with a capital letter, singular or plural:

1. **Associate:** an entity, with or without legal personality, over which a person exercises significant influence, provided that it is not a Subsidiary;
2. **Act of retaliation:** An act or omission that, directly or indirectly, occurring in a professional context and motivated by the Reporting of an Infraction under the Policy, causes or may cause, in an unjustified manner, harm to the Whistleblower or threats and attempts to act and omission.
3. **Whistleblower's assistant:** The natural person who assists the Whistleblower in the complaint procedure and whose assistance must be confidential, including trade union representatives or workers' representatives.
4. **Internal Whistleblower Channel:** email address denunciainterna@greevolt.pt or written communication by other means, addressed to the Responsible for the Internal Whistleblower Channel at Greevolt's registered address, through which reports of Infractions and Infringements must be filed, with or without identification of the Whistleblower.
5. **Complaint:** The report of any Infringement or Irregularity.
6. **Whistleblower:** The natural person who reports an Infringement or Irregularity based on information obtained in the exercise of the professional activity (even if it has ceased in the meantime, at the recruitment stage or in the pre-contractual negotiation phase) that he develops within the GreenVolt Group or in the interaction with the entities that constitute the same, regardless of the nature of this activity and the area or department in which it is carried out, namely workers, service providers, contractors, subcontractors and suppliers and any persons acting under their direction or supervision, holders of shareholdings, persons belonging to GreenVlot management, management, tax or supervisory bodies, volunteers and interns (paid or unpaid).
7. **Greenvolt Group:** means the group of companies owned and associated with Greevolt - Energias Renováveis, S.A. and made up of its subsidiaries.
8. **Significant Influence:** the power to participate in the financial and operational policy decisions of the investee or of an economic activity, but which is not Joint Control or Control over those policies. Significant Influence can be obtained by ownership of shares, statute, or agreement.
9. **Target Person:** The person who, in the complaint, is referred to as the offender or associated with the offence.
10. **Policy:** The present policy with the object described.
11. **Responsible for the Whistleblower Channel:** The person responsible for receiving and monitoring the treatment of Infractions, in accordance with the terms provided for in this Policy.

ANNEX II

For the purposes of the Policy, an Infringement is considered:

- (a) the act or omission contrary to rules contained in the acts of the European Union referred to in the Annex to Directive (EU) 2019/1937 of the European Parliament and of the Council, national rules implementing, transposing, or complying with such acts, or any other rules contained in implementing legislative acts, or transposition of the same, including those that provide for crimes or offenses, referring to the areas of:
 - i) Public procurement;
 - ii) Financial services, products and markets and prevention of money laundering and terrorist financing;
 - iii) Product safety and compliance;
 - iv) Transport safety;
 - v) Protection of the environment;
 - vi) Radiation protection and nuclear safety;
 - vii) Food and animal safety, animal health and animal welfare;
 - viii) Public health;
 - ix) Consumer protection;
 - x) Protection of privacy and personal data and security of the network and information systems;
- (b) the act or omission contrary to and detrimental to the financial interests of the European Union referred to in Article 325 of the Treaty on the Functioning of the European Union (TFEU), as specified in the applicable European Union measures;
- (c) the act or omission contrary to the internal market rules referred to in Article 26 (2) of the TFEU, including competition and state aid rules, as well as corporate tax rules;
- (d) Violent crime, especially violent and highly organized, as well as the crimes provided for in Article 1 (1) of Law No 5/2002, of January 11, which establishes measures to combat organized and economic-financial crime; and
- (e) the act or omission that contradicts the end of the rules or standards covered by points (a) to (c).