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	12.16.2025		COMPLIANCE	
	CODE OF BUSINESS CONDUCT AND ETHICS		Version: 01	1

CODE OF BUSINESS CONDUCT AND ETHICS

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Code of Business Conduct and Ethics

Preamble

Greensol Renewables LLC (“Greensol” or the “Company”) specializes in EPC solutions for utility-scale solar and storage projects, delivering performance, reliability, and long-term value contributing to a cleaner and more sustainable future. As an EPC company, we transform renewable energy objectives into reality through teamwork, technical excellence, and responsible business practices.

Our success depends not only on the quality of our work but on the integrity with which we operate.

This Code of Business Conduct and Ethics (the “Code”) reflects the Company’s key principles — safety, transparency, fairness, and respect for people, communities, and the environment. All employees, directors, officers, and third parties acting on behalf of Greensol must uphold these standards.

Approval and Effective Date

Approved by the Board of Directors of Greensol Renewables LLC on December 16, 2025. This Code is effective upon approval and remains in force until amended or replaced. It will be reviewed periodically to reflect legal, operational, and industry developments.

1. Revision History

Version No.	Date	Description
00	December 16, 2025	Approval by the Board of Directors of Greensol Renewables LLC

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2. Purpose

This Code sets out Greensol’s values and provides practical standards of conduct for daily work. All employees, officers, directors, and third parties acting for or on behalf of Greensol must comply with it.

This Code is part of Greensol’s Compliance Program and is complemented by internal policies (e.g., Anti-Corruption, Gifts & Hospitality, Conflicts of Interest, HSE, Trade/Sanctions, Privacy & Information Security, and Supplier Due Diligence).

Whenever differences exist between this Code, applicable law, or internal policies, personnel must follow the strictest standard.

3. Scope of Application

This Code applies to Greensol Renewables LLC and all entities it directly or indirectly controls (“Greensol Group”). It covers all employees (“Employees”), directors, officers, temporary personnel, and contract workers (“Personnel”), as well as suppliers, subcontractors, consultants, agents, and any other third parties representing the company (“Third Parties”).

Third Parties are expected to maintain ethical standards consistent with this Code and with contractual obligations.

4. Obligations under the Code

Personnel and Third Parties must:

- Comply with this Code, applicable laws, and internal policies
- Act with integrity and professionalism
- Disclose actual or potential conflicts of interest
- Respect human rights and support fair labor practices
- Protect health, safety, and the environment

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- Safeguard confidential and proprietary information
- Maintain accurate and complete records
- Cooperate in good faith with reviews, audits, and investigations

Violations may result in disciplinary action, contract termination, and referral to authorities when appropriate.

5. Corporate Values

Greensol's culture is grounded in integrity, safety, sustainability, respect, excellence, and accountability.

- Integrity means doing what is right.
- Safety means protecting people and preventing harm.
- Sustainability means minimizing environmental impact and supporting the energy transition.
- Respect means fairness and dignity for all.
- Excellence means delivering high-quality work.
- Accountability means taking responsibility for our actions.

Transparency, anti-corruption, and social responsibility support Greensol's long-term success.

6. Ethical Principles and Standards of Conduct

The following standards form the basis of Greensol's expected conduct.

More detailed requirements may be set out in separate global or local policies. Personnel must apply these principles consistently and seek guidance whenever uncertain.

6.1. Anti-Corruption and Bribery

Greensol prohibits bribery and corruption. All employees should ensure that they are aware of their obligations and responsibilities under applicable anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA),

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and all other applicable anti-corruption and anti-bribery laws in every jurisdiction where we operate. Compliance with these requirements is mandatory.

Personnel and Third Parties may not offer, promise, authorize, request, or accept anything of value for the purpose of improperly influencing a business decision or securing an undue advantage. Facilitation payments (“grease payments”) are prohibited. Employees should not engage in money laundering or other corrupt practices and should report unusual transactions.

Gifts, hospitality, and business courtesies may be given or received when they serve legitimate business purposes such as building and maintaining professional relationships. Such items must be modest in value, infrequent, lawful, and reasonable under the circumstances. Cash, cash equivalents, or gift cards are strictly prohibited. Gifts, meals, or entertainment with a value between US \$100 and US \$300 per person must be reported to the Compliance.

Items valued over US \$300 per person require prior written approval from the Compliance Department (or from the CEO if provided to senior management). If prior approval is not practicable, such as when a gift arrives unexpectedly or is presented publicly, Personnel must seek approval as soon as possible after receipt. All interactions involving government officials must comply with additional requirements outlined in Greensol's Anti-Corruption Policy, regardless of value.

Interactions with government officials, employees of state-owned or controlled entities, and political representatives require heightened diligence and must be transparent and accurately documented. Sponsorships, charitable contributions, and community investments must never be used to obtain or retain business and must be properly recorded in the Company accounts.

6.2. Anti-Money Laundering, Sanctions, and Tax Fraud

All employees must ensure that they are aware of their obligations and responsibilities under applicable anti-money laundering and counter-terrorist financing laws, as well as U.S. sanctions and export control requirements administered by the Office of Foreign Assets Control (OFAC), the Export Administration Regulations (EAR), and relevant foreign authorities. Compliance with these requirements is mandatory. The term 'money laundering' refers to the process whereby an attempt is made using legal or illegal financial market instruments to conceal the source or the proceeds of criminal activity and to introduce such proceeds into the legitimate financial system.

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Greensol shall conduct due diligence on customers, suppliers, subcontractors, joint-venture partners, and other Third Parties to ensure we do not engage in business with prohibited, restricted, or high-risk entities or individuals.

Cash transactions are not permitted unless expressly approved in writing by senior management. All financial transactions must be transparent, properly documented, and recorded in accordance with generally accepted accounting principles. Employees may not participate in or assist with any transfers that violate or aim to avoid exchange control restrictions.

Greensol shall comply with all applicable tax obligations in every jurisdiction in which we operate.

Personnel must immediately report any suspicious activity or unusual financial behavior to Compliance or Legal. Employees must promptly distance themselves from any discussion or situation where they suspect corrupt practices may be occurring and must report such situations to local management as an incident. The presence of employees at discussions between suppliers and third parties, or the hosting of such discussions on company premises, could be misconstrued as indicating that Greensol agrees with or supports potentially improper actions.

6.3. Political Contributions and Political Affairs

Greensol does not make political contributions on behalf of the company, directly or indirectly. Additional restrictions on political contributions are contained in Greensol's Anti-Corruption Policy.

Employees are free to express their personal views on public matters and engage in political activities of their choice outside the workplace, on their own time and at their own expense. When engaging in such activities, employees must make clear that any views expressed are their own personal opinions and not those of Greensol. Employees must not use company resources, including time, equipment, or facilities, for personal political activities or to support political candidates or causes.

Greensol will not compensate or reimburse employees for time spent on political activities, including running for office, serving in elected positions, or campaigning

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for political candidates. Greensol will not reimburse Employees for any personal political contributions. Employees must comply with all applicable federal, state, and local election laws and regulations. Any requests or inquiries from government officials regarding political contributions or activities must be immediately referred to the Legal Department.

6.4. Conflicts of Interest

Employees should avoid conflicts of interest in performing their day-to-day business activities, as well as in other outside activities. A conflict of interest arises when an employee has a personal, family, or financial interest that interferes with or influences their independent judgment and objectivity in the best interests of Greensol.

A personal interest may arise not only from the individual employee but also from related persons, including spouses, domestic or civil partners, family members, or entities controlled by the employee or related persons. Employees should avoid situations that may place or appear to place their personal interests in opposition to Greensol's best interests. The mere perception of a conflict of interest must also be avoided, as perception can be just as damaging to Greensol's reputation as any actual conflict.

Within the framework of respect for personal privacy, and recognizing that relationships and external activities are part of individual life, all employees are expected to make decisions guided exclusively by the legitimate interests of Greensol. Whenever a possible conflict of interest is detected, employees must promptly inform their manager or the Compliance Department so that the appropriate measures can be adopted under conditions of strict confidentiality.

Employees and related persons must not engage in any professional activity with a company that competes with Greensol or its subsidiaries. If such a circumstance exists prior to joining Greensol, the employee must immediately disclose it in writing to the Compliance Department for assessment and potential mitigation measures.

Employees and related persons must disclose in advance to management or Compliance any activity that involves exchanging goods or services with Greensol,

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or any transaction in which the employee could influence decisions for personal benefit or the benefit of a related party.

Personnel who have potential or actual conflicts of interest must take reasonable measures to prevent their personal interests from influencing their professional responsibilities. If the conflict cannot be prevented, the individual must promptly report in writing to their manager or the Compliance Department, describing the circumstances and reasons for the conflict. Compliance and management will evaluate the situation and determine the appropriate resolution, which may include removing the person from decision-making processes, requiring divestment of the private interest, or implementing a formal declaration of interests.

For illustrative purposes, Greensol considers the following situations as potentially constituting a conflict of interest:

- Acting as a director, officer, consultant, agent or employee of a supplier, customer, competitor or other business entity that engages in business with the Company;
- Owning a material interest in or being a creditor of or having other financial interest in a supplier, customer, competitor or other business entity that engages in business with the Company;
- Receiving from or giving to any supplier, customer or competitor gifts, gratuities, special allowances, discounts or other advantages not generally available to employees of the Company;
- Having any significant direct or indirect personal interest in a business transaction involving the Company;
- Conducting outside activities that materially detract from or interfere with the full and timely performance of an employee's job duties for the Company;
- Influencing commercial transactions involving purchases, contracts or leases in a way that would have a negative impact on the Company or its business.

Employees must exercise good judgment and act transparently when potential conflicts arise. Disclosing a potential conflict is always preferable to concealing one. Greensol will assess each case individually with due consideration for proportionality, confidentiality, and fairness.

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6.5. Human Rights, Equality and Fair Work

Greensol respects internationally recognized human rights and adheres to applicable labor, employment, and anti-discrimination laws in every jurisdiction where we operate. Our Company prohibits child labor, forced labor, human trafficking, and discrimination of any kind. We comply with applicable U.S. federal, state, and local employment laws and equivalent foreign laws, including requirements relating to equal opportunity, wages and hours, safety, and freedom from harassment.

Our commitment to diversity and inclusion aligns with our core values of respect, integrity, and excellence, and is reflected throughout our operations and policies. Diversity and inclusion are sponsored at Greensol's leadership levels and initiatives are applicable to our practices and policies on recruitment and selection, compensation and benefits, professional development and training, promotions, transfers, social and recreational programs, layoffs, terminations, and the ongoing development of a working environment built on the premise of equity. Personnel must report any concerns regarding human rights violations or unfair labor practices.

6.6. Equal Employment and Nondiscrimination

Greensol provides equal employment opportunities to all qualified employees and applicants. Employment decisions are based on merit, qualifications, performance, and business needs. We do not discriminate on the basis of race, color, sex, sexual orientation, gender identity or expression, religion, national origin, age, disability, marital status, veteran status, or any other status protected by applicable law.

Greensol ensures that our diverse and inclusive culture is recognized as a business goal, with every level of the organization being accountable for:

- Open and respectful communication between all employees regardless of their area or level
- Seeking, encouraging, and welcoming insights of diverse groups and different points of view; employees are embraced in their uniqueness and not alienated or excluded because of differences in cultural norms

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- Creating an environment where employees feel that their unique backgrounds and characteristics are considered to promote equity and equal access to opportunities, ensuring no discrimination will be an obstacle to professional growth
- Implementing a compensation and benefits strategy that promotes and enhances co-parental responsibilities and parental leaves, which applies to all family structures
- Ensuring inclusive behavior and ever-growing diversity, especially intersectional diversity of our workforce, is visible at every level of the organization and in every business area
- Providing ongoing training and mentoring to help employees recognize their own unconscious and conscious biases and prevent these from manifesting at work

Complaints of discrimination will be promptly reviewed, and appropriate corrective action will be taken. Retaliation against anyone who raises a good-faith concern or participates in an investigation is strictly prohibited.

6.7. External Communications

Personnel must exercise caution when making public statements, whether formally or informally, recognizing that such statements may impact Greensol's reputation and create perceptions that could be harmful to the company. Employees should consider whether their statements are necessary, appropriate, and accurate. Only designated spokespersons may communicate with the media or make statements on behalf of Greensol. All communications with media, investors, analysts, or other external parties must be referred to the Marketing Department, the Country General Manager, or the CEO. This includes publications in magazines, newspapers, website commentaries, and any communication with radio, television, or other media outlets.

Communications with government agencies, regulatory bodies, or supervisory authorities must be coordinated with the Legal Department, and any inquiries from such bodies should be notified immediately to Legal. Personnel must not speak on behalf of Greensol on social media, websites, or public platforms unless expressly authorized. Personal opinions must never be presented as Company views, and employees must clearly distinguish between personal statements and any perception of official Company positions.

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6.8. Harassment

Greensol strictly prohibits any form of harassment in the workplace. Harassment includes, but is not limited to: epithets; slurs; negative stereotyping; threatening, intimidating or hostile acts; or conduct that degrades or shows hostility or hatred toward an individual because of race, color, national origin, religion, gender, sexual orientation, gender identity or expression, cultural difference, language, marital status, political opinion, age, disability, veteran status, or any other protected characteristic.

Examples of harassment include:

- Verbal: Unwelcome comments, jokes, slurs, or remarks of a racial, sexual, or otherwise offensive nature.
- Physical: Unnecessary touching, impeding or blocking movement, hitting, or other unwanted physical contact.
- Visual: Derogatory or offensive posters, cards, cartoons, graffiti, drawings, emails, gestures, or other materials that create a hostile work environment.

Anyone who experiences or observes harassment must report it to Human Resources, a manager, or the Legal Department. Complaints will be handled promptly, sensitively, and confidentially to the extent possible. Individuals found responsible for harassment—or for retaliating against anyone who reports a concern—will be subject to disciplinary action, up to and including termination.

6.9. Health, Safety and Environment

Greensol is committed to conducting its business in a responsible manner that protects human health and the environment through observance of all applicable laws and regulations. Safety is fundamental to Greensol's operations as an EPC contractor.

Fundamental to the implementation of this Code is the monitoring and assessment of compliance with laws, regulations, and the Company's policies. Performance data and compliance information must be reported accurately, fully, and in a timely manner to the appropriate Greensol Personnel.

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Our Company complies with all applicable federal, state, local, and international health, safety, and environmental requirements, including OSHA, EPA regulations, and equivalent foreign standards.

6.10. Environmental Stewardship

Environmental protection is fundamental to Greensol’s mission. Our company maintains environmental management systems focusing on the efficient use of materials, reduction of greenhouse gas emissions, proper waste management, and protection of biodiversity.

Personnel should:

- Abide by both the letter and the spirit of all environmental and worker protection laws, regulations, and obligations;
- Follow all safety rules, procedures, and site-specific HSE plans, and use required personal protective equipment (PPE);
- Report unsafe or unhealthy work conditions to management;
- Report known or potential environmental or safety non-compliant situations to management;
- Act upon and resolve unsafe, unhealthy, and potential non-compliant situations in a reasonable and timely manner;
- Obtain appropriate permits prior to commencement of work activities, such as environmental permits and permit-to-work;
- Promptly report releases and spills that may harm the environment or public health or that meet company or regulatory reporting requirements;
- Participate in mandatory training and maintain required certifications;
- Exercise the authority and responsibility to stop work when conditions appear unsafe.

All incidents, near misses, and hazards must be reported immediately. Greensol is committed to preventing workplace injuries and illnesses and to continuously improving safety performance. Greensol also promotes awareness among its employees, customers, and suppliers to encourage environmentally responsible behavior across the entire value chain.

6.11. Information Security and Privacy

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Greensol is and remains the owner of all information created by its Personnel during their employment or engagement with the company that relates to the business, goods, or services of Greensol, irrespective of where such information is stored or maintained, e.g., in electronic form on company or employee devices, in paper format, or on CDs, flash drives, or other transportable media. Confidential information is one of Greensol's most valuable assets. All employees, officers, and third parties who have access to non-public information obtained through their work or business relationship with the company must be aware of their duty to protect our trade secrets, confidential and proprietary information, and any such third-party information that our suppliers, customers, and partners have entrusted to us. This obligation continues even after the employment or contractual relationship with Greensol ends.

Trade secrets and confidential or proprietary information should never be discussed in public places, disclosed to Personnel (or others) who do not have a need to know, or used in an unlawful or unauthorized manner. Failure to protect this information can lead to legal actions, damage Greensol's reputation, and impair our competitive position. In general, confidential and proprietary information includes information that has not been disclosed to the public and gives Greensol an advantage over competitors and could cause harm if disclosed inappropriately. Confidential and Proprietary Information may include:

- Technical, business, financial or other information that might be of use to competitors, of interest to the press, or harmful to Greensol or its customers or suppliers if disclosed;
- Technical data, engineering designs, project proposals, business strategies, pricing structures, cost estimates, and bid documentation;
- Information about the company's financial condition, prospects or plans and information relating to mergers, acquisitions and divestitures;
- Client and supplier information, internal reports, proprietary software, and trade secrets;
- Information about potential transactions with other companies and information about our suppliers, customers or joint venture partners which Greensol is under an obligation to maintain as confidential;
- Discussions and deliberations relating to business issues and decisions; or

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- Personnel information and records and any other information not publicly available that provides Greensol with a competitive or operational advantage.

Employees must refrain from disclosing, reproducing, or transmitting confidential information to third parties without prior written authorization from management or the Legal Department. Personnel must take appropriate precautions to prevent accidental disclosure, such as maintaining secure electronic storage, using company-approved communication systems, and avoiding discussions of sensitive matters in public places or with those who do not have a need to know.

The obligation to maintain confidentiality applies equally to information entrusted to Greensol by customers, suppliers, or partners. Such information must be treated with the same level of care as the company's own proprietary data. Unauthorized disclosure or misuse of confidential information, whether intentional or negligent, may result in disciplinary action, termination, and, when applicable, legal liability under trade secret and contract laws.

Employees who believe that confidential information has been lost, stolen, or improperly disclosed must immediately notify their supervisor or the Compliance Department so that corrective and preventive actions can be taken.

6.12.Fair Competition and Business Integrity

Greensol complies with all applicable antitrust and competition laws. Personnel must not enter into agreements or share commercially sensitive information with competitors.

All external communications must be accurate, truthful, and consistent with Greensol's values and legal obligations.

6.13.Company Assets and Accurate Records

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Personnel must protect Greensol's physical, financial, and intellectual property and use it only for legitimate business purposes. Company assets—such as equipment, vehicles, technology, software, funds, and proprietary information—must not be misused, damaged, or used for personal benefit. All books, records, entries, and financial transactions must be complete, accurate, and properly documented. Falsification of records, test results, time entries, invoices, expenses, or any other data is strictly prohibited. Personnel must comply with internal controls and record-keeping requirements and report any irregularities.

6.14. Laws, Rules and Regulations

Personnel must comply with all applicable laws, regulations, and internal policies in every jurisdiction where Greensol operates. Employees are expected to understand the legal and regulatory requirements relevant to their roles and to participate in required training. When uncertain, employees must seek guidance from their manager, Legal, or Compliance.

Personnel should consult Legal if they believe cross-border considerations may apply. Greensol provides resources, policies, and training to support compliance.

7. Speaking Up and Reporting Concerns

If an Employee is aware of a possible violation of this Code, improper accounting or financial reporting, or has a question about whether a situation may violate this Code, the employee should promptly report the matter. Reports may be made to a manager, Human Resources, Compliance, or Legal. Greensol also maintains a confidential reporting channel that allows individuals to raise concerns securely and, where permitted by law, anonymously.

Greensol has a separate Whistleblower Policy with respect to reports of corporate wrongdoing or concerns regarding malpractice. This process is separate and apart from the reporting processes mentioned above. It is intended to be used where an Employee has serious and justifiable doubts about the willingness and ability of his or her supervisor to act appropriately on such information.

All reports will be reviewed promptly and handled fairly, with appropriate confidentiality. Investigation scope and timing will depend on the circumstances. Greensol does not tolerate retaliation against anyone who raises a concern in

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good faith, participates in an investigation, or refuses to engage in wrongful conduct. Any act of retaliation is a serious violation of this Code.

Intentionally false or malicious reports are prohibited.

Where required or appropriate, Greensol may refer matters to governmental or regulatory authorities.

8. Internal Regulation

Greensol maintains additional internal policies, procedures, and guidelines that provide more detailed requirements on the topics addressed in this Code.

These include, among others:

- Anti-Corruption Policy
- Gifts & Hospitality Policy
- Conflicts of Interest Policy
- Health, Safety & Environment (HSE) Policy
- Trade Compliance and Sanctions Policy
- Privacy and Information Security Policies
- Supplier Due Diligence Policy
- Whistleblowing Policy

These documents may be updated periodically and are available through Greensol's internal platforms. Personnel are expected to review and comply with all policies applicable to their role and to seek guidance from their supervisor, Human Resources, Legal, or Compliance whenever questions arise. This Code does not replace detailed internal policies but serves as an overarching framework for ethical conduct.