

Code of Conduct for Business Partners

A photograph of a vast field of sunflowers under a dramatic sunset sky. The sun is low on the horizon, casting a warm glow over the scene. The sunflowers are in the foreground, and the field extends to the horizon. A large, stylized green graphic, resembling a leaf or a drop shape, is overlaid on the right side of the image.

Acting
consciously.

FOREWORD

At greentech corporate solutions GmbH and all its affiliated companies (hereinafter collectively referred to as "**greentech**"), we place great importance on integrity, sustainable development and compliance with internationally recognised standards in all our business relationships - whether with customers, suppliers, employees or competitors. We are proud to be committed to the principles of the **UN Global Compact** and the **Solar Stewardship Initiative ("SSI")**.

The **UN Global Compact** is the world's largest and most important initiative for sustainable and responsible corporate governance. As signatories, we commit to strategically embedding the ten universal principles of the UN Global Compact into our business operations and to actively contributing to the achievement of the United Nations **Sustainable Development Goals ("SDGs")**.

The aim of the **SSI** is to promote responsible, transparent and sustainable production, procurement and management of materials in the solar value chain. It brings together manufacturers and buyers from the global solar industry. The development of a separate ESG standard has established a way of independently verifying the commitment to sustainable supply chains across all sectors.

This Code of Conduct sets out the standards and expectations that greentech has of all its business partners (as defined below). "**Business partner**" for the purposes of this Code of Conduct means any natural or legal person with whom greentech enters into or maintains a business relationship or cooperation. This includes, but is not limited to, suppliers, service providers, consultants, contractors, distributors, agents, intermediaries and customers.

We have committed ourselves to an internal Code of Conduct and expect our business partners not only to comply fully with all applicable laws and regulations, but also to respect internationally recognised environmental, social and corporate governance standards. These include, but are not limited to, the OECD Guidelines and respect for human rights.

Every business partner is obliged to comply with and implement the standards of this Code of Conduct and to implement them to the best of their ability in their business and supplier relationships. The Code is an integral part of the business relationship between greentech and the business partner.

The following sections specify our expectations regarding the behaviour of our business partners in their corporate activities. They form the basis for the successful and responsible organisation of our business relationships.

These standards relate to:

I. COMPLIANCE WITH STATUTORY CORPORATE DUE DILIGENCE OBLIGATIONS

II. CORPORATE RESPONSIBILITY AND BUSINESS INTEGRITY

III. HEALTH AND SAFETY AT THE WORKPLACE

IV. HUMAN AND LABOUR RIGHTS

V. ECOLOGICAL RESPONSIBILITY

VI. IMPLEMENTATION, AUDITING AND CONTRACTUAL SAFEGUARDS

I. COMPLIANCE WITH WITH STATUTORY CORPORATE DUE DILIGENCE OBLIGATIONS

The business partner undertakes to conduct its business activities in accordance with the statutory provisions. This is the fundamental principle of economically responsible behaviour. The business partner shall comply with the applicable legal requirements and obligations. In the event that the applicable legal requirements are lower than the requirements set out in this Code of Conduct, greentech expects the business partner to comply with the higher standards.

The business partner therefore has the following obligations in particular:

- to observe all applicable national and international laws and regulations applicable to the respective contractual relationship.
- To demonstrate, through appropriate management systems, policies and guidelines, effective risk management, training and the allocation of sufficient resources, that it is committed to and complies with the requirements of this Code of Conduct or its own equivalent code of conduct and all other applicable laws and regulations. The measures should be appropriate to the size and type of business activity of the business partner.
- to cooperate and support within reasonable bounds insofar as remedial and/or preventive measures within the meaning of the Code of Conduct are to be implemented.

II. CORPORATE RESPONSIBILITY AND BUSINESS INTEGRITY

Integrity is an essential prerequisite for doing business, not only because national and international regulations have increased the risk of illegal or unauthorised behaviour and exacerbated the negative consequences, but also because integrity helps to ensure the stability and sustainability of a company. We at greentech endeavour to ensure that our business partners within our sphere of influence comply with the principles set out in this Code of Conduct.

The business partner therefore has the following obligations including but not limited to:

Avoidance of any conflicts of interest:

- to ensure that business decisions are made free of any conflicts of interest with private interests or other activities. To avoid such conflicts of interest for the business partner and its employees without disregarding the legitimate business interest. Such potential conflicts of interest must be reported to greentech.

Prohibition of corruption:

- to prevent and reject all forms of corruption, including facilitation payments for routine official acts. The business partner shall ensure that employees or subcontractors do not grant, offer or accept bribes, kickbacks, improper donations or other improper payments from public officials or other third parties with the aim of obtaining an order or other preferential treatment in business dealings.

Prohibition of money laundering:

- to never participate in money laundering or the financing of terrorist or criminal activities and to comply with applicable anti-money laundering regulations and trade sanctions programmes. This requires careful scrutiny before a business partner is selected.

Free competition:

- to compete fairly and in compliance with all applicable antitrust and competition laws without, for example, agreeing on prices, quantities, market shares or customer allocations or exchanging competitively sensitive information.

Protection of confidential information/data protection

- to protect entrusted, confidential and sensitive information (business secrets and personal data) with due care, not pass it on to third parties without authorisation and ensure that it is collected, processed and deleted in accordance with the law. The security of electronic data processing processes must be guaranteed; any IT-related risks must be identified and rectified and regular checks must be carried out.

Use of artificial intelligence

- to ensure that all AI-based developments comply with applicable laws and regulations. AI systems must be designed to be non-discriminatory. AI applications are always controlled by humans.
- to comply with all applicable rules and regulations relating to product safety, quality and due diligence for all goods supplied such as equipment, items and services, including any rules established by greentech.

III. HEALTH AND SAFETY AT THE WORKPLACE

Health and safety at the workplace are of fundamental importance for the well-being and performance of all employees. A safe and healthy working environment is not only an ethical imperative, but also a legal obligation and a decisive factor for the long-term success of a company.

The business partner has the following obligations in particular:

- to comply with all current and applicable occupational health and safety regulations and ensure a safe and healthy working environment for employees. All premises provided by the business partner must be safe, comfortable and hygienic.
- depending on the size of the company – should appoint a person responsible for occupational health and safety within the organisation.
- to take necessary measures - including appropriate controls, work procedures, workplace inspections, emergency plans and provision of safety equipment - to prevent hazards and accidents in the workplace.
- to monitor and record health and safety hazards and report and investigate all health and safety incidents.
- to ensure that staff have received appropriate health and safety trainings, endeavour to raise awareness of health and safety issues among its employees and subcontractors and ensure a culture of safety through transparent communication.

IV. HUMAN AND LABOUR RIGHTS

Human rights and compliance with basic labour rights are essential components of responsible corporate governance. The business partner must respect internationally recognised human rights and, as part of its corporate due diligence obligations in the area of human rights, avoid adverse effects and, if necessary, remedy them within its supply chain.

The business partner has the following obligations in particular:

Prohibition of discrimination

- to avoid and to actively prevent any form of discrimination against employees. In particular, no one may be discriminated against on the basis of gender, age, skin colour, religion or ideology, social background, health, ethnic origin, nationality, membership of employee organisations, political membership or political opinion or sexual identity. This applies in particular to the recruitment of employees and in relation to their training and development, promotion and remuneration.
- to not tolerate any physical, psychological, verbal or sexual harassment or abuse of employees.

Ban on child labour

- to respect the prohibition of child labour, in particular the prohibition of employing a child under the age at which compulsory education ends under the law of the place of employment, whereby the age of employment may not be less than 15 years (in accordance with ILO Convention 138 on child labour), unless one of the exceptions recognised by the ILO applies (cf. ILO No. 138). However, these exceptions are only permitted if local law also provides for them.
- to ensure that the employment of young people over the minimum age but under the age of 18 does not jeopardise their education, health, safety or mental health.

Ban on forced labour

- to respect the prohibition of the employment of persons in forced labour, all forms of slavery, slavery-like practices, servitude or oppression in the workplace, including the withholding of passports or other documents from employees. Any form of employment must be voluntary and without threat of punishment or other forms of personal humiliation.

Freedom of association

- to respect the right of employees to organise, form and join (or not join) a trade union or other collective organisation and to bargain collectively. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative options for independent and free association must be provided. Employee representatives must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

Fair pay & fair working hours

- to pay employees at least the statutory minimum wage and recognise their right to appropriate remuneration. Overtime must be compensated in accordance with national legislation. Wages and overtime must be paid regularly.
- to prescribe reasonable working hours that comply with applicable laws and collective agreements. Overtime must be voluntary, unless exceptions are permitted in collective agreements or similar contracts.

Preservation of natural resources

- to respect the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and water when acquiring, developing or otherwise using land, forests and water whose use secures a person's livelihood. The business partner must refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this harms the health of people, significantly impairs the natural basis for food production or prevents people from having access to safe drinking water or sanitary facilities.
- To respect the prohibition of hiring private or public security forces if, due to a lack of instruction or control, the prohibition of torture is violated or life or limb is harmed during the deployment of the security company.

Dealing with conflict materials

- To establish processes in accordance with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas for conflict materials such as tin, tungsten, copper, tantalum and gold, as well as for other raw materials such as cobalt. Smelting and refining without appropriate or audited due diligence processes should be avoided.

V. ECOLOGICAL RESPONSIBILITY.

greentech also promotes and demands environmentally conscious behaviour from its business partners in their day-to-day work. This also applies to sub-suppliers of the business partners.

For business partners, this means in particular:

- should comply with applicable environmental protection laws and regulations. The business partner shall ensure that all necessary environmental authorisations are available, kept up to date and complied with in his company.
- to use resources efficiently and minimise environmental impact. This includes regular monitoring of emissions, energy consumption, water utilisation, waste water, raw materials, air pollution and the storage and handling of chemicals, hazardous materials and waste, on a sector-specific and risk-based basis.
- should ensure that the traceable procurement of components is possible through the implementation of processes, especially if these contain ecologically and/or socially critical raw materials.
- should implement measures in accordance with legal requirements to monitor operational greenhouse gas emissions, fulfil any reporting obligations and endeavour to reduce them.
- to endeavour to promote and improve the circular economy in business models, product design and overall operations.
- to consider the impact of its business on biodiversity and, where appropriate, act to protect and/or enhance biodiversity.

- to provide, to a reasonable extent, environmental performance data as input for environmental assessments, product life cycle assessments and/or product declarations and labelling at greentech's reasonable request.
- In order to identify and minimise sustainability risks in the supply chain, shall disclose information about its supply chains to a reasonable extent upon justified request, for greentech to fulfil its legal obligations.

VI. IMPLEMENTATION, AUDITING AND CONTRACTUAL ASSURANCE.

greentech expects its business partners to implement an appropriate risk management system to monitor and ensure compliance with this Code of Conduct.

Business partners must make the information provided by greentech on the responsibility for and implementation of an anonymous complaints procedure (Whistleblower channel) available to their employees. Alternatively, depending on the size of the company, a comparable complaints procedure should be set up at company level.

In order to verify compliance with the requirements of this Code of Conduct, the business partner authorises greentech or a third party commissioned by greentech to carry out spot checks or event-driven inspections. This can be done through dialogue, the disclosure of information or - if greentech deems it necessary - through a site inspection. Such an inspection takes place in the presence of the business partner and always preserves confidentiality aspects. Each audit takes into account the interests of the business partner in undisturbed operations and is carried out in accordance with its legal and contractual obligations.

If a violation of this Code of Conduct is detected, greentech reserves the right to take appropriate steps to protect its rights in accordance with the following gradation:

- Request to take immediate corrective action;
- Review of reported problem treatments and improvement measures and submission of appropriate evidence;
- Cancellation of outstanding orders, suspension or exclusion of future orders;
- If a material breach of this Code of Conduct is detected by greentech and no other effective remedy is available or the business partner refuses or is unable to take corrective measures requested by greentech, greentech shall be entitled to terminate the contract underlying the business relationship for cause. This applies irrespective of any other contractual agreements between greentech and the business partner, of which this Code of Conduct is an integral part, ordinary and extraordinary cancellation rules.

greentech may waive its right of termination if the business partner can credibly assure and prove that it has immediately initiated countermeasures to prevent future similar violations.

HELP / CONTACT / WHISTLEBLOWER SYSTEM

If you have any questions, uncertainties or suspected violations of this Code of Conduct, please contact the Compliance Officer of the greentech Group confidentially by email:

Email: compliance@greentech.energy

Alternatively, you can also contact the following whistleblower hotline:

Address: datenschutz nord GmbH, Konsul-Smidt-Str. 88, 28217 Bremen (for the attention of Mr Dominik Bleckmann)

Telephone: +49 421 6966 32 300

Email address: meldestelle@datenschutz-nord.de

The business partner shall inform greentech immediately of any confirmed violation.

Acknowledgement and consent of the business partner:

By signing this Code of Conduct, the business partner undertakes to act responsibly and to comply with it and to take all necessary precautions for the implementation of the Code of Conduct.

Business partner

Place, date, signature