

# Our Code of Conduct

greentech Code of Conduct



**Acting  
consciously.**

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## FOREWORD BY THE MANAGEMENT

Dear colleagues,

greentech is one of the leading experts for the development, construction and operation of photovoltaic plants in Europe. We are a young, growing company with the will to offer the best possible PV solutions and thus further advance the energy transition.

The trust that our customers, partners and the public place in greentech is our greatest asset. It is a trust that we have earned over the years, but that we also have to keep earning each day. Only if we all act sincerely and responsibly can we protect and consolidate it permanently. We are thus laying the foundation for our continued entrepreneurial success and the safeguarding of our jobs.

By joining the UN Global Compact, we have committed to upholding the universal principles of the UN Global Compact in the areas of human rights, labour standards, environmental protection and anti-corruption. The basis of our actions is our Code of Conduct. As a common guideline, it names the minimum standards for working with each other at greentech, but also with and from business partners and the public. The Code follows a simple and fundamental principle:

All of us - whether employees, executives or management - are required to act appropriately and correctly in our daily work. First and foremost, this means that we know the legal and ethical requirements – and comply with them. Violations of this are not only incompatible with our values, but they also damage our reputation as a company - and thus all of us. Moreover, they can have serious legal consequences. This is where the Code of Conduct provides guidance. It is binding for all of us. However, its objective goes far beyond that of a catalogue of instructions. The Code conveys values to which greentech is expressly committed.

And: it encourages us to use our discernment and seek advice when needed.

We want to work together based on respect, cooperation and teamwork. By placing the Code of Conduct at the heart of everything we do, we promote a culture of ethically responsible behaviour. That also includes a climate of openness that enables us to address issues without fear of reprisals. This applies in particular to violations of the Code of Conduct. Anyone who learns of such violations can contact the compliance officer at any time. Ensuring the long-term success of greentech is something that we all work on. By making the right decisions in your daily work, you make a very significant contribution to this.

Thank you for your contribution.

Ingo Rehmann Felix von Buchwaldt Oliver Herzog Aleksis Schäfer Jörn Carstensen

## OUR VALUES



### Partnership

in partnership as a team for the future

Together we are devoted to our mission. To do so, everyone we work with and who is involved in our activities is regarded as valued partner, with equal status. We realise that it is only through cooperation and trust that we are able to implement our vision.



### Respect

respectful in dealing with people, values and resources

We appreciate and are respectful of people and resources, as well the values entrusted to us, which we actively uphold, nurture and develop. After all, these form the basis of our success.



### Excellence

excellent in service and outcomes

We provide excellence in terms of quality, professionalism and reliability for everything we offer and in every approach. Excellence is a necessary pre-requisite to create value-based outcomes, both personally and in terms of business, and long-lasting success.



### Commitment

committed in our thoughts and actions

We are ambitious, passionate and full of energy. Our strengths in terms of implementation and our entrepreneurial spirit set us apart. We encourage and solicit initiative and flexibility in thoughts and actions.



### Sustainability

sustainable in implementation and impact

We use our strength, our expertise and our resources to make our actions sustainable and fit for the future. In doing so, we develop solutions that last, have a positive impact on our environment and are economically successful.

## OUR UNDERSTANDING OF COMPLIANCE.

### COMPLIANCE: DEFINITION & MEANING.

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Compliance means that an organisation adheres to the applicable rules and laws - both country-specific laws and requirements of regulatory authorities and internal directives in the organisation itself.

The measures to be taken for this purpose are intended to ensure that misconduct or compliance violations are detected, clarified or prevented at an early stage, before they result in harm to persons or business partners and serious consequences such as criminal prosecution, fines or serious damage to the company's reputation.

These include the company's own Code of Conduct as well as regulations from environmental protection and labour law.

By investing in compliance, greentech benefits on several levels:

- ◆ greentech ensures that our values are lived and adhered to,
- ◆ violations can be detected early and prevented,
- ◆ greentech behaves in accordance with the law,
- ◆ employees and management are better protected from fines or criminal prosecution,
- ◆ greentech enjoys a higher reputation, damage to its reputation is avoided and
- ◆ greentech is attractive for new employees, business partners and/or investors.

Integrity, in other words a living compliance culture, is the prerequisite for successful compliance management. It should be an integral part of corporate culture and forms the foundation of a successful compliance management programme.

**For each and every one of us, this means ...**

**... complying with the laws and policies that apply to us and thus always respecting our understanding of integrity and legal compliance as defined in this Code of Conduct.**

## OUR COOPERATION

### WE ARE COMMITTED TO RESPECT.

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At greentech, we respect, protect and promote the human rights enshrined in the United Nations human rights covenants and guarantee the free development of personality. Our cooperation is guided by mutual respect.

In detail this means:

### TOLERANCE SHAPES OUR ACTIONS.

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At greentech, we value diversity and inclusion as they are key to our success. We want to foster a corporate culture that promotes a sense of belonging and respect and ensure that our values are lived and adhered to. At the same time this makes greentech an attractive employer and supports the company's success in our markets (today and in the future).

For us, diversity and inclusion is a long-term goal that can only be achieved together.

We treat all persons equally - without regard to gender, sexual orientation, ethnicity, religion, political opinion, age, marital status, pregnancy, disability, national origin or any other characteristic on which discrimination is prohibited by law.

We have zero tolerance for any kind of discrimination, harassment, bullying or intimidation, be it physical, verbal or non-verbal. This includes but is not limited to suggestive remarks, jokes, insults, or other visual, non-visual, graphic, electronic, or physical behaviour that could create an offensive, intimidating, or hostile work environment. Sexual harassment – whether between members of the same or the opposite sex – will not be tolerated. This includes all unwanted sexual advances, requests for sexual favours and other overt or subtle behaviour of a sexual nature.

Our culture is characterised by equal opportunities, trust and mutual respect. Employees in management positions set the best example.

### WE RESPECT THE RIGHT TO FREEDOM OF ASSOCIATION AND THE RIGHT TO FORM A COALITION.

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We respect the right of all employees to freedom of association, freedom of organisation and collective bargaining within the framework of national laws and act accordingly. The exercise of this right - i.e. the negotiation and agreement of working conditions - is not restricted at greentech.

### WE ARE COMMITTED TO THE ABOLITION OF CHILD LABOUR.

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The protection of minors is something particularly close to our hearts. We do not employ children below the age of 15 or before they reach the age at which compulsory schooling ends. We also naturally expect this from our business partners.

## WE DO NOT TOLERATE FORCED LABOUR.

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No employee shall be forced to work by violence or intimidation of any kind. We prohibit all involuntary employment, all forms of modern slavery, forced or bonded labour. This includes any work or service which is required of a person under threat of punishment and for which he or she has not volunteered. Degrading treatment, corporal punishment as well as deductions from wages as disciplinary measures are not permitted. We also naturally expect this from our business partners.

**For each and every one of us, this means ...**

- ... addressing suspected violations of human rights,**
- ... that we do not accept jokes or remarks of a discriminatory nature,**
- ... acting with respect for human rights and tolerance and treating each other with respect.**

## OUR BUSINESS ACTIVITIES.

### WE DISCLOSE POSSIBLE CONFLICTS OF INTEREST.

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We always make business decisions in the best interests of our company and taking into account the interests of our business partners. Where unavoidable conflicts of interest arise between the interests of our business partners and those of greentech, we disclose them. With this transparency, we ensure that any conflicts of interest are managed in the best possible way and that contracts are awarded at arm's length.

However, if employees have other motives, conflicts of interest may arise under certain circumstances. Caution is required at this point - because personal interests or relationships must not play a role in business decisions. At best, we avoid such conflicts of interest right from the start. If this is not possible in individual cases, we address them openly with our superiors.

Private voluntary work, although essentially welcome, can also be linked with a conflict of interest. The same applies to secondary occupations, activities in supervisory bodies and advisory boards or financial participations. Before taking up a conflict-prone activity, an assessment together with the supervisor is required and the human resources department must be informed.

For example, when can conflicts of interest arise?

- ◆ In personnel decisions,
- ◆ in business relationships with third parties,
- ◆ when privately commissioning suppliers or other business partners,
- ◆ when commissioning greentech companies on behalf of business partners such as investors,
- ◆ when taking up secondary employment.

### WE ASSUME SOCIAL RESPONSIBILITY.

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We recognise our corporate and social responsibility as a group of companies. Therefore, we regularly donate to charitable, cultural or scientific causes. These are voluntary contributions in cash or in kind, which we identify as such and make in the interest of our group of companies.

We support employees who do voluntary work. However, we never engage in voluntary or political work on behalf of greentech or during working hours. It is important to us to avoid conflicts between private and business interests, or even the appearance of them. We solely base our decisions on factual criteria and do not allow ourselves to be influenced by personal interests and relationships.

### WE DO NOT TOLERATE CORRUPTION.

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The legality of our business practices is clearly more important than economic success. In competition, we distinguish ourselves through quality and service - we do not tolerate corruption.

Corruption is the unlawful influencing of business partners by granting or accepting advantages that go beyond the legal regulations or our own internal company rules, for example in the



context of customer care. Corruption not only prevents fair competition and causes economic damage, it also damages our good reputation. Corruption is also punishable in many cases.

We protect ourselves and our business partners by dealing transparently with donations of any kind.

For each and every one of us, this means ...

- ... acting ethically, with integrity and transparency,
- ... not to accept or make any improper gifts of money or property or other favours,
- ... to report suspected cases of bribery as well as actual violations and
- ... to only select business partners based on factual and objective criteria.

## WE FIGHT MONEY LAUNDERING AND TERRORIST FINANCING.

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We are required to do business only with clients who conduct legitimate business and to use only funds that come from legitimate sources.

We do not engage in or facilitate money laundering and comply with applicable anti-money laundering and anti-terrorist financing laws and regulations.

- ❖ Money laundering is the process of using legitimate transactions to disguise the origin of funds derived from criminal activities.
- ❖ Terrorist financing is the provision of funds for terrorist activities. Funds can come from legitimate business activities or from criminal sources (drug trafficking, extortion, etc.).

We must make sure who we are dealing with before agreeing to a transaction to prevent us from being involved in money laundering or co-financing terrorist activities ("know your customer" principle).

### Alarm signals

Suspicious situations (a so-called "suspected case") that indicate possible money laundering activities may exist, for example,

- ❖ when customers are unwilling to provide business-related information.
- ❖ if a single invoice is to be paid in several tranches.
- ❖ if payments are to be made with large amounts of cash or cash equivalents.
- ❖ when payments are to be transferred to an account that is not the normal business account or is located in a different country than that of the company or business transaction.

For each and every one of us, this means ...

- ... to immediately report a suspicious case to the [compliance officer](#).

## WE COMPLY WITH ALL APPLICABLE SANCTIONS.

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What is a sanction?

A sanction is a trade restriction that contributes to the foreign policy of a country or supranational organisation. It may prohibit any economic activity or be directed against any government entity, company, activity or individual. It usually includes the following restrictions:

- ◆ Business activities with specific industries, business contacts with companies or specific persons.
- ◆ Financial transactions or the provision of funding to a country subject to sanctions or to specific companies or individuals.
- ◆ Travelling to or from a country under sanctions.

For each and every one of us, this means ...

... complying with all economic and financial sanctions imposed by Germany and the EU. Through our integrity and due diligence compliance, we all contribute to preventing illegal activities.

*Additional information:*

[Justice portal of the federal and state governments: Financial sanctions list](#)  
[BaFin \(Federal Financial Supervisory Authority\) - Country and sanction lists](#)  
[Customs online - List of persons and organisations](#)

## WE SUPPORT FAIR AND FREE COMPETITION.

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Fair and free competition is protected by applicable competition and antitrust laws. Compliance with these laws ensures that there is no distortion of competition in the market - to the benefit of all market participants.

In particular, agreements and concerted practices between competitors which have the purpose or effect of preventing or restricting free competition are prohibited. It is also inadmissible to abuse a dominant market position. Such abuse can occur, for example, in the case of different treatment of customers without objective justification (discrimination), in the case of the enforcement of unreasonable purchase or sales prices and conditions or in the case of tying transactions without objective justification for the additional service demanded. Anti-competitive behaviour can not only damage greentech's good reputation, but also result in severe fines and penalties.

We are committed to fair and legal competition in accordance with the applicable competition and antitrust laws. Anti-competitive behaviour, such as price fixing between companies, leads to a distortion of competition. Unfair competition methods also regularly lead to legal disputes and can result in significant contractual penalties, fines and civil liability claims.

For each and every one of us, this means ...

... conducting business according to the principle of performance and on the basis of the market economy as well as free, unhindered competition,  
... that we do not enter into any anti-competitive agreements with competitors, suppliers or customers and  
... that we do not abuse any dominant position that may exist in the market.

## WE DO NOT ENGAGE IN INSIDER TRADING.

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Insider trading is the buying or selling of stocks or other financial instruments (e.g. options) based on inside information. Insider information is all non-public information about events that are likely to affect the share price, for example financial results or information about the planned purchase and sale of parts of the company or significant business transactions. Insider trading is prohibited.

For each and every one of us, this means ...

... refraining from any form of insider trading, unlawful disclosure of insider information and thus market manipulation.

## OUR RESPONSIBILITY AT THE WORKPLACE.

### OCCUPATIONAL SAFETY AND HEALTH PROTECTION.

#### WE PROVIDE AND ENSURE SAFE WORKING CONDITIONS.

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At greentech, we put people first. That is why we pay attention to the physical and mental health of our employees. We are committed to providing a safe workplace, preventing accidents and injuries, and minimising risks associated with our jobs.

We care about the people. Which is why we support our employees through health-related offers. This includes occupational health support, health promotion (both physical and mental health), and workplace support for individuals with disabilities. We want to prevent physical and mental exhaustion through working time management and sufficient rest periods.

Ensuring a safe and healthy workplace is a shared responsibility and a sign that we respect ourselves and those around us.

For each and every one of us, this means ...

... reporting accidents, near-accidents or other safety-related observations to the [HR department](#).

... that we always adhere to the applicable safety guidelines and requirements.

### DRUGS AND ALCOHOL.

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The unrestricted decision-making ability of our employees is an indispensable prerequisite for the success and safety of our work. greentech is committed to complying with occupational health and safety laws and to creating a safe and healthy working environment.

We therefore expect all employees to carry out their work and all decisions with clarity and without any interference from drugs or alcohol.

For each and every one of us, this means ...

... that we are not under the influence of drugs or alcohol.

... not using drugs or alcohol during working hours or on the way to work.

### PROTECTION OF INTELLECTUAL PROPERTY.

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Innovations are of great importance for the economic success of a company. Therefore, the rights to tangible and intangible assets such as trademarks, designs, copyrights or know-how are under special protection.

We fully recognise the intellectual property of others and make sure that nobody gains unauthorised access. No form of use, reproduction or distribution is permitted without the consent of the copyright holder. If we gain access to sensitive information or information of third parties

that requires protection, we are committed to maintaining confidentiality. We also carefully protect our proprietary know-how.

## DATA PROTECTION.

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To protect privacy, special legal regulations exist for the handling of personal data. In principle, the collection, storage, processing and other use of personal data require the consent of the data subject, a contractual provision or another legal basis.

For us, data protection is the basis for a reliable business relationship and a component of a trusting working relationship. We therefore comply with the relevant data protection regulations and implement them in our business processes.

We protect the personal data of employees, former employees, business partners and other data subjects. We collect, process, use and store personal data only in accordance with legal requirements.

We take into account that the collection, storage, processing and other use of personal data may only take place with the consent of the persons concerned, with a contractual regulation or on another legal basis. All components of information processing must be secured in such a way as to ensure the confidentiality, integrity, availability, verifiability and resilience of the information requiring protection and to prevent unauthorised internal and external use.

**For each and every one of us, this means ...**

**... that we contact our supervisor in case of doubt.**

## IT SECURITY.

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Information technology (IT) or electronic data processing (EDP) is an indispensable part of greentech's everyday work, but it harbours a large number of risks. This includes, in particular, the impairment of data processing by malware (viruses), the loss of data due to programme errors or the misuse of data (for example by hackers, phishing e-mails, disclosure of confidential data, so-called social engineering).

We take IT security and thus the security of our systems and data seriously and protect them.

**For each and every one of us, this means ...**

**... paying attention to IT and EDP security and adhering to the applicable regulations and take advantage of the IT training courses offered.**

## CORPORATE PROPERTY.

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greentech's tangible and intangible assets are used to support our employees in achieving the company's business objectives and may only be used within the framework of company regulations. We treat it with respect and observe the necessary safety measures.

For each and every one of us, this means ...

... using tangible and intangible property of the group of companies within the framework of company regulations exclusively for company purposes and not for personal or external purposes. In doing so, we handle company assets carefully.

## OUR RESPONSIBILITY TO PROTECT RESOURCES AND THE ENVIRONMENT.

WE DEAL SUSTAINABLY WITH RESOURCES AND THE ENVIRONMENT.

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greentech is always aware of its responsibility for the environment, because in all business activities it is necessary to keep an eye on the finite resources of our planet. greentech therefore promotes and demands environmentally conscious behaviour from its employees in their everyday work.

Our goal is to continuously improve the environmental compatibility of our business activities and to use raw materials and the environment in a responsible manner. For greentech, it is a matter of course that we comply with or exceed national and international legal regulations and standards on environmental protection.

For each and every one of us, this means ...

- ... protecting our environment, using all natural resources sparingly and avoiding or reducing burdens on people and nature,
- ... taking into account the requirements of an intact environment in our business processes and continuously improving ourselves and
- ... .. expect compliance with all applicable laws and regulations for the protection of people and the environment from our business partners as well.

## HELP / CONTACT / WHISTLEBLOWER SYSTEM.

In its Code of Conduct, greentech combines its fundamental ethical values with its expectations of rule-compliant behaviour by its employees. Together, we protect ourselves and others, as well as the corporate group, by addressing what is not proper.

In case of questions, uncertainties or suspicion of violations of internal and external regulations, we talk to our superiors and seek advice from the relevant departments. We can contact the compliance officer of the greentech group confidentially at any time:

Email: [compliance@greentech.energy](mailto:compliance@greentech.energy)

In addition, we can anonymously report information about rule violations via the [whistleblower system](#) of the greentech group, for example if we do not want to contact our superior. We are aware that the greentech Group's whistleblower system is responsible in particular for processing tips on serious breaches of rules. A serious breach of the rules occurs when our fundamental ethical values set out in the Code of Conduct are significantly violated.

At the same time, the whistleblower system safeguards the interests of those affected. The presumption of innocence applies to them as long as a violation is not proven. The foundation for the work of the whistleblower system is formed by uniform processes as well as confidential and professional whistleblowing. This also means that investigations are only initiated if there are concrete indications of a serious breach of the rules. Misuse of the whistleblower system will not be tolerated and will be punished accordingly.



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<https://greentech.energy/philosophie-werte/>

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