



ACCOMMODATION POLICY

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1. GLOSSARY

For the purposes of this accommodation and allowance policy (hereinafter, the **“Policy”**):

- (i) **“Board of Directors”** means the Board of Directors of Grupo Gransolar, S.L.;
- (ii) **“Bylaws”** means the bylaws (*estatutos sociales*) of Grupo Gransolar, S.L.;
- (iii) **“Commercial Code”** means the Spanish Commercial Code;
- (iv) **“Corporate Macro Policy”** means the human resources corporate macro policy of Gransolar Group;
- (v) **“ESG Committee”** means the advisory body of the Board of Directors responsible for managing and overseeing environmental, social and governance (ESG) matters of all the companies forming part of Gransolar Group (including, among others, Gransolar), prior to their final approval by or submission to the Board of Directors;
- (vi) **“Governance Department”** means the governance department of Gransolar Group;
- (vii) **“Governance Director Plan”** means the governance director plan of Grupo Gransolar, S.L.;
- (viii) **“Gransolar”** means Gransolar Construction Australia Pty Ltd and any companies over which it exercises, directly or indirectly, effective control;
- (ix) **“Gransolar Group Companies”** means all the companies forming part of Gransolar Group (including, among others, Gransolar);
- (x) **“Gransolar Group”** means the Group whose parent company is Grupo Gransolar, S.L., to which Gransolar belongs;
- (xi) **“Group”** means a group of companies within the meaning of Article 42 of the Spanish Commercial Code, i.e., a group of companies which, in accordance with such article, is under the direct or indirect control of a parent company;
- (xii) **“Human Resources Department”** means the human resources department of Gransolar Group; and
- (xiii) **“SDGs”** means the Sustainable Development Goals established under the 2030 Agenda for Sustainable Development.

2. INTRODUCTION

Gransolar Group Companies base its management model on operational excellence, responding to the needs and expectations of its stakeholders, creating value for society and promoting sustainable development in its social, economic and environmental dimensions.

In this context, the corporate governance system of Gransolar Group Companies is structured through a set of internal rules (hereinafter, the **“Internal Regulatory System”**), including corporate policies, which constitute an essential element to (i) ensure compliance with applicable regulations, (ii) establish clear guidelines for the development of activities, and (iii) promote the standardization and efficiency of internal processes.

The Internal Regulatory System is inspired by the highest international standards in the fields of sustainability, business ethics and corporate governance. In particular (and by way of example only), as a

participating member of the United Nations Global Compact, Gransolar Group Companies promote the SDGs and actively assumes their responsibility as an agent of change in matters of sustainability.

Likewise, Gransolar Group Companies maintain a firm commitment to:

- (i) the respect for and protection of Human Rights, adopting a preventive and due diligence approach in relation to potential violations in the territories in which it operates (this commitment extends to all stakeholders of Gransolar Group Companies, who are provided with access to a whistleblowing channel); and
- (ii) the promotion of the highest standards of transparency, business ethics and accountability, applying a zero-tolerance policy towards any conduct contrary to the provisions of the Internal Regulatory System and extending these principles throughout its entire value chain.

In line with the above, Gransolar Group Companies promote an organizational culture based on regulatory anticipation, encouraging the early adoption of new regulations, as well as the incorporation of guidelines, standards and recommendations issued by leading international organizations.

3. PURPOSE AND OBJECTIVE

The purpose of this Policy is to establish the principles, criteria and guidelines governing the accommodation and allowance arrangements (collectively, the “**Arrangements**”) provided by Gransolar to its employees (understood as any persons linked to Gransolar through an employment, commercial, training or any other similar legal relationship):

- (i) assigned to construction projects carried out by Gransolar (each a “**Project**”); and
- (ii) which are required to temporally live away from their principal place of residence in order to live in close proximity to a Project;

(collectively, the “**Employees**”), with the objective of ensuring:

- (i) consistency in the application of the Arrangements;
- (ii) compliance with applicable legal and regulatory requirements (including those of the Australian Taxation Office (ATO)); and
- (iii) adequate support for the Employees.

4. SCOPE OF APPLICATION

4.1. OBJECTIVE SCOPE OF APPLICATION

This Policy shall apply to the provision of the Arrangements.

4.2. SUBJECTIVE SCOPE OF APPLICATION

This Policy shall apply to (and, therefore, shall be binding upon) Gransolar and its Employees.

4.3. GEOGRAPHICAL SCOPE OF APPLICATION

This Policy shall apply in Australia.

5. GENERAL PRINCIPLES

In the course of its activities, Gransolar Group Companies shall act in accordance with the following general principles:

- (i) Regulatory compliance: Gransolar Group Companies shall carry out their activities in accordance with (a) the regulations applicable in each jurisdiction in which they operate and (b) the provisions set out in the Internal Regulatory System, promoting a culture of compliance and zero tolerance for conduct contrary to the law or to their internal rules.
- (ii) Integration into strategy and decision-making: Gransolar Group Companies shall integrate the principles set out in the Internal Regulatory System into their corporate strategy, their decision-making processes and the management of their activities and operations.
- (iii) Risk-based management: Gransolar Group Companies shall apply a preventive and risk-based approach, promoting the identification, assessment, mitigation and monitoring of the risks associated with the scope of application of each of the documents forming part of the Internal Regulatory System.
- (iv) Responsibility and accountability: Gransolar Group Companies shall promote responsible, transparent and traceable conduct, establishing appropriate supervision, control and monitoring mechanisms to ensure the proper implementation of each of the documents forming part of the Internal Regulatory System.
- (v) Continuous improvement: Gransolar Group Companies shall promote the review and continuous improvement of their processes, tools and management systems, adapting to regulatory, technological and business environment developments.
- (vi) Training and awareness: Gransolar Group Companies shall promote the training, communication and awareness of all documents forming part of the Internal Regulatory System, in order to ensure their proper understanding and compliance by their corresponding subjective scope of application.
- (vii) Extension to the value chain: Gransolar Group Companies shall promote the application of the principles set out in the Internal Regulatory System in their relationships with business partners, suppliers, contractors and other third parties, where appropriate depending on the nature of the relationship.
- (viii) Respect for international standards: Gransolar Group Companies shall guide their actions in accordance with internationally recognized standards, guidelines and best practices in the fields of sustainability, business ethics and corporate governance.

6. ACCOMMODATION AND ALLOWANCE PRINCIPLES

In addition to the general principles set out in Section 5 above (which shall govern all activities of Gransolar Group Companies in general), in the provision of the Arrangements, Gransolar shall act in accordance with the following principles:

- (i) Types of accommodation support: Gransolar may provide different types of accommodation support to its Employees, including corporate housing or hotel accommodation, taxable accommodation allowances, and Living Away from Home Allowances (“LAFHA”), depending on the nature and duration of the assignment and applicable legal requirements.
- (ii) Compliance with applicable regulations: all Arrangements shall be structured, administered and monitored in compliance with all applicable laws and regulations, including the requirements of

the Australian Taxation Office (ATO), particularly in relation to eligibility, substantiation, declaration and reporting obligations.

- (iii) Tax treatment and proper administration: the Arrangements shall be correctly classified and processed in accordance with their applicable tax treatment (including taxable allowances and tax-exempt LAFHA), and administered through Gransolar's payroll and financial systems, ensuring accuracy, transparency and traceability.
- (iv) Temporal nature of certain allowances: certain allowances, including LAFHA, shall be granted on a temporary basis and subject to applicable legal limits and Project-related conditions. Where such limits are exceeded or eligibility criteria are no longer met, the applicable allowance framework shall be adjusted accordingly.
- (v) Support for Employees' mobility: the Arrangements shall aim to facilitate Employees' mobility and ensure adequate support for the Employees required to work away from their principal place of residence, including the provision of temporary accommodation where necessary to enable relocation to project sites.
- (vi) Management oversight and approval: the eligibility, duration and conditions of the Arrangements shall be determined by the corresponding manager, in accordance with project requirements, operational needs and applicable internal policies. Any exceptions or extensions shall require prior approval of the corresponding manager.
- (vii) Employees' responsibility and cooperation: Employees benefiting from Arrangements shall comply with all applicable legal and internal requirements, including fulfilling any declaration, record-keeping and notification obligations, ensuring the accuracy of all information provided, and cooperating with any internal reviews or audits carried out by Gransolar.
- (viii) Alignment with Internal Regulatory System: all Arrangements shall be aligned with the Internal Regulatory System.

7. RELATED INTERNAL REGULATIONS

7.1. ASCENDING HIERARCHY

This Policy forms part of the Internal Regulatory System of Gransolar Group and is hierarchically positioned below the following corporate rules, upon which it depends and in furtherance of which it is issued:

- (i) the Bylaws;
- (ii) the Governance Director Plan; and
- (iii) the Corporate Macro Policy.

7.2. DESCENDING HIERARCHY

This Policy may be implemented through procedures, protocols or other internal rules specifying its practical application.

In the event of any contradiction between this Policy and internal rules of a lower hierarchical rank, the provisions of this Policy shall prevail, without prejudice to the provisions set forth in applicable legal regulations or in internal rules of a higher hierarchical rank.

7.3. SAME HIERARCHICAL LEVEL

In the event that Gransolar Group has specific corporate policies which, depending on the same Corporate Macro Policy, regulate matters related to the subject matter of this Policy (including those whose adoption is mandatory under the applicable regulations in a specific jurisdiction), such policies shall:

- (i) comply with the general principles and guidelines established in the relevant Corporate Macro Policy; and
- (ii) be applied in coordination with this Policy.

8. RESPONSIBLE DEPARTMENT

The department responsible for this Policy is the Human Resources Department.

9. COMMUNICATION

9.1. INTERNAL COMMUNICATION

This Policy shall be published on the corporate intranet of Gransolar Group, so that it is (i) disseminated among and (ii) accessible to all its employees.

9.2. EXTERNAL COMMUNICATION

This Policy shall be published on the websites of Gransolar Group, so that its stakeholders may access it.

10. REVIEW AND UPDATE

This Policy shall be reviewed and – where appropriate – updated every three (3) years by the Human Resources Department, in coordination with the Governance Department.

Without prejudice to the foregoing, this Policy may be reviewed and, where appropriate, updated in advance when (i) regulatory or organizational changes occur, or when there are changes in the risk profile associated with its scope of application, or (ii) the Human Resources Department and/or the Governance Department deem it appropriate due to any other circumstance.

In any case, any proposal for amendment shall be reported to the ESG Committee, which shall be responsible for submitting such proposal to the Board of Directors for approval.

11. APPROVAL

This Policy has been approved by the Board of Directors, as part of its general and non-delegable authority to approve the general policies and strategies of Gransolar Group Companies.

12. ADDITIONAL PROVISIONS

This Policy shall be interpreted in accordance with the applicable regulations and the Internal Regulatory System.



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