GRANSOLAR GROUP

LEAVE POLICY

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VERSION: A1
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SUMMARY:

TITLE	Leave Policy
SCOPE OF APPLICATION	Gransolar Group's Australian companies
DISCIPLINE	Human Resources
CATEGORY	Policy
PREPARED BY	Human Resources Department (as defined below)
RESPONSIBLE DEPARTMENT	Human Resources Department
APPROVAL DATE	27/05/2026
APPROVAL BODY	Board of Directors (as defined below)
VERSION REPLACED	N/A
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USE	Public

VERSION HISTORY:

VERSION	DATE	PREPARED BY	CHANGES MADE	REVIEWED BY
A1	27/05/2026	Human Resources Department	Creation	Governance Department (as defined below)

APPROVAL HISTORY:

VERSION	DATE	APPROVED BY
A1	27/05/2026	Board of Directors

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1. GLOSSARY

For the purposes of this leave 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, 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 Group**" means the Group whose parent company is Grupo Gransolar, S.L.;

(ix) "**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;

(x) "**Human Resources Department**" means the human resources department of Gransolar Group;

(xi) "**Leave**" means an authorized absence from work, including but not limited to annual leave, sick leave, long service leave, personal/carer's leave, parental leave and any other form of paid or unpaid leave; and

(xii) "**SDGs**" means the Sustainable Development Goals established under the 2030 Agenda for Sustainable Development.

2. INTRODUCTION

Gransolar Group bases 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 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 promotes the SDGs and actively assumes its responsibility as an agent of change in matters of sustainability.

Likewise, Gransolar Group maintains 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, 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 promotes 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 actions of Gransolar Group with regard to the Leaves of the employees of Gransolar Group's Australian companies (understood as any persons linked to such companies through an employment, commercial, training or any other similar legal relationship) (the "**Leaves**"), with the objective of ensuring a consistent, fair and compliant approach to the management of the Leaves, in accordance with applicable laws and regulations, while promoting employee well-being, operational continuity and alignment with the Internal Regulatory System.

4. SCOPE OF APPLICATION

4.1. OBJECTIVE SCOPE OF APPLICATION

This Policy shall apply to the Leaves.

4.2. SUBJECTIVE SCOPE OF APPLICATION

This Policy shall apply to (and, therefore, shall be binding upon) Gransolar Group's Australian companies (the "**Australian Companies**") 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 shall act in accordance with the following general principles:

(i) Regulatory compliance: Gransolar Group shall carry out its activities in accordance with (a) the regulations applicable in each jurisdiction in which it operates 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 its internal rules.

(ii) Integration into strategy and decision-making: Gransolar Group shall integrate the principles set out in its Internal Regulatory System into its corporate strategy, its decision-making processes and the management of its activities and operations.

(iii) Risk-based management: Gransolar Group 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 its Internal Regulatory System.

(iv) Responsibility and accountability: Gransolar Group 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 its Internal Regulatory System.

(v) Continuous improvement: Gransolar Group shall promote the review and continuous improvement of its processes, tools and management systems, adapting to regulatory, technological and business environment developments.

(vi) Training and awareness: Gransolar Group shall promote the training, communication and awareness of all documents forming part of its 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 shall promote the application of the principles set out in its Internal Regulatory System in its 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 shall guide its actions in accordance with internationally recognized standards, guidelines and best practices in the fields of sustainability, business ethics and corporate governance.

6. LEAVES' PRINCIPLES

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

(i) Compliance with applicable laws and regulations: all Leaves shall be granted and managed in strict compliance with applicable Australian legislation, including the National Employment Standards (NES), as well as any other applicable federal or state regulations, without prejudice to any additional rights recognized in individual employment agreements or internal policies.

(ii) Equal treatment and consistency: Leaves shall be managed in a consistent, objective and non-discriminatory manner, ensuring equal treatment among Employees in comparable situations, taking into account, where applicable, the nature of their employment relationship (full-time, part-time or casual).

(iii) Accrual and recognition of Leaves: Employees shall accrue and be entitled to take Leave in accordance with the conditions established by applicable regulations and this Policy, recognizing the different types of Leaves and their specific requirements, limitations and conditions.

(iv) Prior planning and approval of Leaves: Leaves shall, whenever possible, be planned in advance and subject to prior approval by the relevant manager, ensuring appropriate coordination with operational needs and avoiding undue disruption to business activities.

(v) Balance between the Employees' well-being and business continuity: the management of Leaves shall seek to ensure an appropriate balance between safeguarding the Employees' rights, health, well-being and family responsibilities, and maintaining the operational continuity and efficiency of the Australian Companies and Gransolar Group.

(vi) Responsible use of Leaves: Employees are expected to make responsible and good faith use of their Leaves, complying with the procedures, notice requirements and documentation obligations established in this Policy and applicable regulations.

(vii) Traceability, documentation and control: all Leaves requests, approvals and related processes shall be properly documented, recorded and managed through the appropriate internal systems, ensuring traceability, transparency and compliance with internal control requirements.

(viii) Specific conditions for special Leaves' regimens: certain Leaves, including but not limited to Leave cash-out mechanisms, long service Leave schemes or parental Leave entitlements, shall be subject to specific conditions, eligibility requirements and approval processes as defined in this Policy and applicable regulations.

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.

12. ADDITIONAL PROVISIONS

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

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