



SUPPLIERS CODE OF CONDUCT

DOC. CODE: GGR-GO-COC-0001

VERSION: A1

DATE: 27/05/2026

SUMMARY:

TITLE	Suppliers Code of Conduct
SCOPE OF APPLICATION	Gransolar Group (as defined below)
DISCIPLINE	Supply Chain
CATEGORY	Code of Conduct
PREPARED BY	Governance Department of Gransolar Group
RESPONSIBLE DEPARTMENT	Procurement Department of the Product Area of Gransolar Group Procurement Department of the Services and Solutions Area of Gransolar Group
APPROVAL DATE	27/05/2026
APPROVING BODY	Board of Directors of Grupo Gransolar, S.L.
DOCUMENTS REPLACED	GRS Suppliers Code of Conduct (GGR-GE-COC-0002-A4) PVH Suppliers Code of Conduct (GGR-GE-COC-0003-A3)
CURRENT VERSION	A1
USE	Public

VERSION HISTORY:

VERSION	DATE	PREPARED BY	CHANGES MADE	REVIEWED BY
A1	27/05/2026	Governance Department of Gransolar Group	Creation through the consolidation of documents: GRS Supplier Code of Conduct (GGR-GE-COC-0002-A4) and PVH Supplier Code of Conduct (GGR-GE-COC-0003-A3)	Procurement Department of the Product Area of Gransolar Group Procurement Department of the Services and Solutions Area of Gransolar Group

APPROVAL HISTORY:

VERSION	DATE	APPROVED BY
A1	27/05/2026	Board of Directors of Grupo Gransolar, S.L.

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1. GLOSSARY

For the purposes of this code of conduct (hereinafter, the “**Code of Conduct**”)

- (i) “**Group**” means a group of companies within the meaning provided in Article 42 of the Spanish Commercial Code, that is, a group of companies which, in accordance with the provisions of said article, is under the direct or indirect control of a parent company;
- (ii) “**Gransolar Group**” means the Group whose parent company is Grupo Gransolar, S.L.;
- (iii) “**Internal Regulatory System**” shall mean the set of internal regulations (policies, procedures and other governance documents) of Gransolar Group defining its corporate governance framework and establishing the principles, criteria and guidelines governing its activities and decision-making processes;
- (iv) “**Modern Slavery**” means the set of practices and situations defined by the International Labour Organization as modern slavery, including, among others, forced labor, human trafficking and labor exploitation, and refers to situations of exploitation from which a person cannot refuse to participate or escape due to threats, violence, coercion, deception or abuse of power;
- (v) “**SDGs**” means the Sustainable Development Goals established in the 2030 Agenda for Sustainable Development; and
- (vi) “**Supplier**” (collectively, “**Suppliers**”) shall mean any natural or legal person supplying goods and/or providing services to any of the companies comprising Gransolar Group, including (a) its employees (understood as any persons linked to the Supplier through an employment, commercial, training or any other analogous legal relationship), (b) its directors and managers, (c) its representatives, (d) its subcontractors and (e) any other person acting on its behalf or for its account.

2. INTRODUCTION

At Gransolar Group, we consider ethical, responsible, sustainable and transparent conduct throughout our supply chain to be an essential element for the development of our activities and the creation of long-term sustainable value and, to this end, we expect our Suppliers to carry out their activities in accordance with principles and standards aligned with these values and commitments.

In this context, the Board of Directors of Grupo Gransolar, S.L. has approved this Code of Conduct, which establishes the principles and guidelines of conduct that must govern the behavior of Suppliers and other parties involved in the supply chain of Gransolar Group.

This Code of Conduct forms part of the Internal Regulatory System and constitutes one of the measures adopted by Gransolar Group to promote responsible, sustainable and transparent practices throughout its supply chain, as well as to encourage the integration of ESG criteria and contribute to the achievement of the SDGs.

Likewise, this Code of Conduct is aligned with internationally recognized principles and standards relating to business ethics, sustainability, Human Rights, Modern Slavery and supply chain due diligence — such as the Universal Declaration of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the Ten Principles of the United Nations Global Compact — and has been prepared taking into consideration generally recognized good governance recommendations in international markets and the governance and sustainability principles of Gransolar Group.

3. SCOPE OF APPLICATION

This Code of Conduct applies to – and, therefore, must be signed as a sign of acceptance by – all Suppliers, regardless of the Gransolar Group company with which they have entered into a contractual relationship and regardless of the country in which they provide their service(s) or supply their product(s).

Execution by a Supplier of this Code of Conduct shall be an essential requirement for entering into a contractual relationship of any nature with a Gransolar Group company.

4. SUPPLIER COMMITMENTS

By signing this Code of Conduct, the Supplier assumes the following commitments:

(i) Dissemination of the Code of Conduct:

The Supplier shall promote the proper dissemination, understanding and compliance with this Code of Conduct, as well as the principles contained therein, among its employees, collaborators, subcontractors and business partners.

(ii) Compliance with applicable regulations:

The Supplier must comply with the regulations applicable in the jurisdictions in which it operates, including, among others, regulations relating to international sanctions, export controls and trade restrictions.

The application of this Code of Conduct shall under no circumstances entail or justify the breach of any legal provision.

(iii) Principles of conduct:

The Supplier must act in good faith and in an ethical, responsible, sustainable and transparent manner in the conduct of its activities.

(iv) Respect for Human Rights:

The Supplier must carry out its activities in accordance with internationally recognized Human Rights principles and standards.

(v) Decent working conditions, safety, health and wellbeing:

The Supplier must promote decent, safe and respectful working practices and conditions and must ensure compliance with applicable labor, safety, health, wellbeing and worker protection regulations.

In particular, the Supplier must:

- (a) promote fair working and remuneration conditions in accordance with applicable regulations;
- (b) comply with applicable regulations relating to working hours, rest periods and occupational health and safety;
- (c) ensure safe, healthy and respectful working environments;

- (d) refrain from any form of violence, harassment, abuse or inhumane treatment;
- (e) promote equal opportunities, diversity and inclusion, avoiding any form of discrimination; and
- (f) adopt reasonable measures intended to ensure that facilities provided to workers meet adequate safety, sanitation and hygiene conditions and to prevent occupational risks.

In this regard, any form of the following shall be prohibited:

- (a) child labor;
- (b) Modern Slavery;
- (c) discrimination;
- (d) harassment, abuse or inhumane treatment; or
- (e) any other practice involving a violation of Human Rights.

The Supplier must adopt reasonable measures intended to prevent, identify and mitigate such risks in its operations and supply chain.

(vi) Environment and sustainability:

The Supplier must carry out its activities in an environmentally responsible manner and in accordance with applicable environmental regulations, promoting a preventive and proactive approach to the management of environmental risks associated with its activities.

Among others, the Supplier undertakes to promote practices intended to

- (a) prevent, reduce or mitigate negative environmental impacts;
- (b) encourage the efficient and responsible use of natural resources, including energy, water and raw materials;
- (c) reduce waste, emissions and other sources of pollution;
- (d) encourage reuse, recycling and responsible waste management;
- (e) promote biodiversity conservation and the sustainable management of natural resources;
- (f) promote energy efficiency and the reduction of greenhouse gas emissions;
- (g) explore, where possible and reasonable, more sustainable energy alternatives and renewable energy sources; and
- (h) promote sustainable practices in its operations and supply chains, including responsible procurement and sourcing processes from an environmental perspective.

Likewise, the Supplier shall endeavor to remain adequately informed regarding applicable environmental regulations and any regulatory developments that may affect its activities.

(vii) Business ethics and governance:

The Supplier must act in accordance with the principles of integrity, transparency, fair competition and zero tolerance towards corruption.

In particular, the Supplier must:

- (a) comply with applicable regulations relating to anti-corruption, bribery, competition and anti-money laundering;
- (b) refrain from offering, promising, granting or accepting improper payments, unjustified advantages or undue benefits;
- (c) avoid situations involving conflicts of interest;
- (d) protect confidential information to which it has access;
- (e) maintain complete, accurate and truthful records and information;
- (f) conduct its activities in accordance with principles of fair competition and refrain from any anti-competitive or unfair practices;
- (g) promote ethical, transparent and sustainable practices in its purchasing and procurement processes; and
- (h) reasonably promote the principles and standards contained in this Code of Conduct among its own suppliers, subcontractors and collaborators.

No Supplier may act on behalf of Gransolar Group before authorities, officials or public institutions without prior written authorisation from the relevant Gransolar Group company.

Likewise, any relationship with authorities or public institutions must be conducted in accordance with applicable regulations and with the principles of legality, integrity, transparency and ethical conduct.

(viii) Due diligence:

The Supplier must act with due diligence and adopt reasonable measures intended to identify, prevent, mitigate and, where appropriate, remedy risks or conduct contrary to applicable regulations or to the principles contained in this Code of Conduct, including, among others, risk analysis, the definition of responsibilities and the implementation of appropriate mechanisms for the reporting and management of irregularities.

(ix) Qualification and evaluation:

The Supplier must:

- (a) reasonably cooperate with any qualification and evaluation process carried out by Gransolar Group; and
- (b) provide the information and documentation necessary for the purposes of any qualification or evaluation, as well as to verify compliance with this Code of Conduct and applicable regulations.

(x) Conflict Minerals:

The Supplier must adopt reasonable measures intended to avoid the use of minerals or materials originating from conflict-affected or high-risk areas where their extraction, transport or trade contributes to financing armed conflicts, Human Rights violations or practices contrary to internationally recognized supply chain due diligence standards.

Likewise, the Supplier shall endeavor to develop reasonable traceability and due diligence processes regarding the origin of such minerals or materials, in accordance with applicable regulations and internationally recognized standards.

(xi) Instructions contrary to the Code of Conduct:

The Supplier shall not comply with requests from third parties involving irregular conduct or unlawful, illegal acts or acts contrary to the provisions established in its governance and sustainability system and, in particular, in this Code of Conduct.

(xii) Traceability:

The Supplier must retain the documentation reasonably necessary to evidence compliance with this Code of Conduct.

(xiii) Data protection and cybersecurity:

The Supplier must adopt reasonable measures to protect the confidentiality, integrity and availability of the information to which it has access within the framework of its relationship with Gransolar Group, as well as comply with applicable regulations relating to data protection and cybersecurity.

(xiv) Communication of breaches and relevant incidents:

The Supplier must communicate without undue delay any relevant breach, investigation, sanction or significant risk related to the matters regulated in this Code of Conduct that may affect Gransolar Group or its supply chain.

5. NON-COMPLIANCE

Compliance with this Code of Conduct constitutes an essential element of the business relationships between Gransolar Group and its Suppliers and, therefore, any breach thereof by a Supplier may give rise — in addition to any possible legal, criminal or administrative consequences — to the adoption by Gransolar Group of any measures deemed appropriate in light of the specific circumstances, including corrective measures, enhanced supervision measures, suspension of activities or termination of the contractual relationship.

Any breach or suspected breach of this Code of Conduct may be reported through the Gransolar Group whistleblowing channel, available on the Gransolar Group websites, through the following [link](#).

Pursuant to the provisions of Law 2/2023, of 20 February, regulating the protection of persons reporting regulatory breaches and combating corruption, and transposing Directive (EU) 2019/1937 of the European Parliament and of the Council, Gransolar Group shall guarantee the confidentiality of communications received and protection against retaliation for persons reporting irregularities in good faith, in accordance with applicable regulations and with the “Policy on the Internal Information System for Regulatory Breaches and Whistleblower Protection”, available at the link indicated in the previous section.

The processing and management of communications received through the whistleblowing channel shall be governed by the provisions of the “Procedure on the Internal Information System for Regulatory Breaches and Whistleblower Protection” of Gransolar Group.

6. PERIODIC REVIEW

This Code of Conduct shall be subject to periodic review in order to ensure its adequacy with applicable regulations, international standards and the needs of Gransolar Group.

The Supplier signs below as a sign of acceptance of this Code of Conduct and of its commitment to comply with the principles and standards contained herein — together with the obligations arising from any commercial or contractual relationship formalized with any of the companies comprising Gransolar Group.

Mr / Ms:

On behalf of *(if signed by an individual acting on their own behalf, indicate "N/A")*:

Title of representation¹ *(if signed by an individual acting on their own behalf, indicate "N/A")*:

National document / tax identification number:

¹ In the event that this Code of Conduct is signed by a representative of the Supplier, such representative must provide documentary evidence of their authority to represent the Supplier.



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