



TAX GOOD PRACTICE & COMPLIANCE POLICY

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A1	31/05/2023	Tax Department	Issued for information	Economic and Financial Dpt.
A2	17/12/2024	Tax Department	Policy unification	Governance Dpt.

Approvals

This document has been approved by

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BoD 31/05/2023	A1
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*The Board of Directors of **Gransolar Group, S.L.** (hereinafter, '**Gransolar**'), as part of its general and non-delegable power to develop and approve the general policies and strategies of the company, has approved this Policy (hereinafter, the '**Policy**').*

The objective of this Policy, directed at all stakeholders, is to ensure that the actions and operations of Gransolar are governed by clear principles, values, and standards that enable any employee, any person or entity associated with Gransolar, and the Board of Directors itself to make appropriate decisions to comply with tax legality.

1. Introduction

At Gransolar we see policies and procedures as fundamental within our organization, as they ensure compliance with rules and regulations, provide clear guidance on how to carry out different tasks and simplify internal processes.

At Gransolar we base our management on excellence, responding to the needs of our stakeholders, contributing value to society, and seeking social, economic and environmental sustainability. As Participating Members of the United Nations Global Compact, we promote the Sustainable Development Goals, assuming our role as an agent of change in terms of sustainability. Furthermore, Gransolar defends the recognition of Human Rights, adopting a defensive position in the face of possible violations in the territories where we operate, extending our Whistleblowing Channel to all our Stakeholders, updated in accordance with Directive EU 2019/1937 and Law 02/2023, in order to adopt standards of anonymity and confidentiality.

Furthermore, Gransolar is committed to the highest standards of transparency and accountability, following a zero-tolerance policy towards any conduct contrary to what is set out in our Corporate Policies and extending these commitments to all our stakeholders. This commitment, integrated in all its internal rules, is based on a corporate culture firmly rooted in the sustainability of the business model and extends to all the Group's operations and value chain.

Gransolar is convinced of its role as a leading agent of change. This is why we have adopted an 'early adopter' culture in relation to the new regulations recently approved by the EU, as well as the indications, guidelines, and recommendations of recognized international bodies.

Gransolar, committed to respecting current legislation as one of the basic principles of conduct for the company and its employees, approves the Tax Compliance and Good Practices Policy, which explicitly outlines the general commitment of Gransolar Group, S.L. and its subsidiary companies to comply with tax regulations in Spain and in other countries where they operate.

The Policy, which is established as a mandatory regulatory framework, includes the recommendations of the Code of Good Tax Practices promoted by the Spanish State Tax Administration Agency, adapting them to Gransolar's specific circumstances.

2. Aim & Purpose

The purpose of the Policy is to ensure that Gransolar's actions and operations are governed by clear principles, values, and standards that enable any employee, any person or entity associated with Gransolar, and the Board of Directors itself to make appropriate decisions to comply with tax laws.

3. Scope of Application

The Policy will apply to Gransolar Group, S.L. and to the commercial companies (or any other form of association) that make up Gransolar, regardless of their business sector, geographical location, or activities, as well as to all its executives and employees in the performance of their duties within Gransolar.

For these purposes, "Gransolar" refers to both Gransolar Group, S.L. and the consolidated group of companies headed by this company, and, in general, to any entity under its direct or indirect control. "Control" is understood to exist when Gransolar holds the majority of voting rights in the governing or management body. Furthermore, in entities in which Gransolar holds a stake but does not achieve such control, Gransolar will promote, through the decision-making bodies of the respective companies, the application of the principles, values, and standards outlined in the Policy.

Similarly, Gransolar will encourage third parties providing services to Gransolar or collaborating with it, within the scope of their relationships with Gransolar, to also adhere to these principles, values, and standards.

4. General Principles

Gransolar aims to fulfil its tax obligations in all the territories where it conducts its business activities, as well as to maintain an appropriate relationship with the relevant tax authorities. It is the responsibility of all its employees and collaborators to adhere to this commitment by adopting the following behaviors, considered "Good Tax Practices":

a) Tax risk prevention

Without compromising sound business management, Gransolar will adhere to the principles of an orderly and diligent tax policy in the conduct of its activities:

- i. Ensuring timely and proper compliance with its tax obligations, filing its taxes appropriately, with all relevant information, and in accordance with applicable regulations.
- ii. Establishing the necessary mechanisms to analyze tax implications prior to undertaking, among other things, any type of investment, corporate transaction, contract signing, or any other action that may have tax implications.
- iii. Ensuring that Gransolar's taxation is appropriately aligned with the structure and location of its activities, the human and material resources of the various entities, and the business and financial risks assumed by each of them.
- iv. Promoting practices aimed at the prevention and reduction of significant tax risks.
- v. Reducing conflicts arising from the interpretation of applicable regulations by using instruments established for this purpose by tax systems (e.g., prior consultation with tax authorities, advance pricing agreements, etc.).
- vi. Avoiding the use of opaque structures for tax purposes, understood as those involving the interposition of shell companies located in tax havens or non-cooperative territories with tax authorities, intended to prevent the competent tax authorities from knowing the final responsible party for the activities or the ultimate owner of the assets or rights involved.

- vii. Valuing related-party transactions at market value and complying with the documentation requirements for transfer pricing established by tax legislation.

b) Relations with Tax Authorities

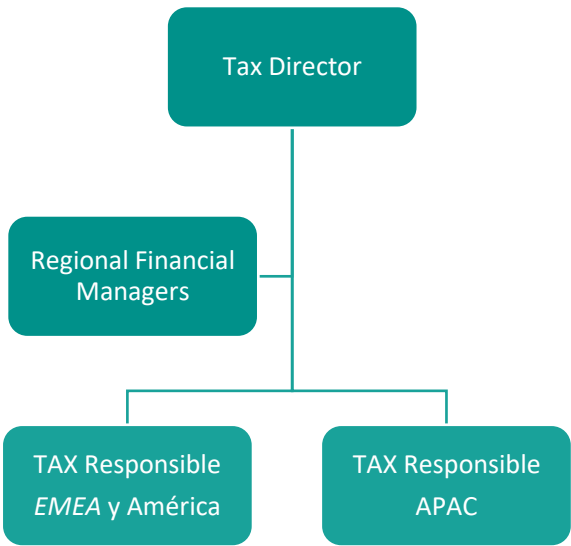
Gransolar’s relations with the competent tax authorities will be governed by the principles of transparency and mutual trust, with Gransolar adopting the following good tax practices:

- i. Collaborating with the competent tax authorities in the detection and seeking solutions regarding fraudulent tax practices that may occur in the markets where Gransolar operates, to eradicate existing ones and prevent their spread.
- ii. Providing the relevant tax information and documentation requested by the competent tax authorities in the shortest time frame and as comprehensively as possible.
- iii. Making use of all the possibilities by the adversarial nature of the inspection procedure, promoting agreement with the competent tax authorities at all procedural stages where feasible.

5. Flowchart and Responsible Parties

Prior to the preparation of the annual accounts and the submission of Gransolar’s Annual Corporate Tax Return, Gransolar’s Tax Director will inform the Board of Directors about the tax policies applied by Gransolar during the fiscal year and, in particular, about the degree of compliance with the Policy.

In the case of transactions or matters that require the approval of the Board of Directors, the Board will be informed in advance of their tax implications when these constitute a relevant factor.



6. Communication and awareness-raising

The Board of Directors of Gransolar Group, S.L. is tasked with ensuring that Gransolar complies with applicable laws and regulations, respects the customs and best practices of the sectors and territories where it operates, and adheres to the principles of social responsibility that it has voluntarily adopted.

The Tax Good Practice & Compliance Policy will be published on the Gransolar Intranet and on the various websites of the Group's companies, so that it can be known and consulted by the company's Stakeholders.

7. Review and update process

The Audit Committee will periodically review the content of this Policy and propose to the Board of Directors any modifications that contribute to its development and continuous improvement.

Additionally, the Tax Department, designated by Gransolar's Board of Directors as the tax compliance body, will review and update the content of this Policy periodically, within a period not exceeding three years, and will independently and continuously perform the functions of supervising the operation and effectiveness of this policy.

Considering the above, the Board of Directors of the Company will promote Gransolar's adherence to the principles and good tax practices contained in section 4 of the Policy, as well as any other similar principles that may be incorporated in the future.



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