



# VISA SPONSORSHIP POLICY

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SUMMARY:

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## 1. GLOSSARY

For the purposes of this visa sponsorship 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**” means the Group whose parent company is Grupo Gransolar, S.L., to which Gransolar belongs;
- (x) “**Gransolar Group Companies**” means all the companies forming part of Gransolar Group (including, among others, Gransolar);
- (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;
- (xiii) “**SDGs**” means the Sustainable Development Goals established under the 2030 Agenda for Sustainable Development; and
- (xiv) “**Visa Sponsorship**” (collectively, “**Visa Sponsorships**”) means the administrative, legal, and financial support provided by a company to an individual for the purpose of obtaining or maintaining the legal right to work in the jurisdiction of employment, which shall be subject to the fulfillment of specific eligibility criteria (including job criticality and candidate qualifications), the adherence to commitment expectations regarding professional conduct and tenure, and the compliance with cost recovery obligations in the event of voluntary resignation or termination for cause.

## 2. INTRODUCTION

Gransolar Group Companies base their 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, 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 actions of Gransolar with regard to the Visa Sponsorship to its employees, with the objective of ensuring a consistent, fair and compliant approach to the management of the Visa Sponsorships, 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 Gransolar’s Visa Sponsorships to any of its employees who is:

- (i) seeking Gransolar’s sponsorship for continued employment; or
- (ii) currently employed on a temporary visa, including:
  - (a) subclass 417 (Working Holiday);
  - (b) subclass 407 (Training Visa);
  - (c) subclass 482 (Temporary Skill Shortage); and
  - (d) subclass 186 (Permanent Residency);

(collectively, the “**Employees**” and each an “**Employee**”).

#### 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 their 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. VISA SPONSORSHIP 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 relation with Visa Sponsorships, Gransolar shall act in accordance with the following principles:

- (i) Discretionary nature: Visa Sponsorship is not an entitlement and is offered at the sole discretion of Gransolar.
- (ii) Business alignment: Visa Sponsorships decisions are subject to business needs, specific role requirements, the Employee's performance, and strict compliance with Australian immigration laws.
- (iii) Right to amend: Gransolar reserves the right to amend or withdraw Visa Sponsorship support at any time, subject to its legal obligations.
- (iv) Core eligibility: to be considered for sponsorship, the sponsored role must represent a genuine long-term business need, the Employee must maintain satisfactory performance, and the nomination must receive executive approval and align with workforce planning.

## 7. SPECIFIC VISA SPONSORSHIP SUBCLASSES AND CRITERIA

### 7.1. SUBCLASS 417 (WORKING HOLIDAY VISA)

Employees engaged under a Subclass 417 visa are subject to specific age and duration limitations: they must be aged 18 to 30 years (or up to 35 for certain nationalities) and are generally restricted to working no more than six (6) months on a single project unless a formal exemption is granted by the Department of Home Affairs.

These Employees may only be engaged on a casual or fixed-term basis, and it is their responsibility to maintain adequate health insurance for the duration of their stay in Australia.

Continuous compliance with conditions regarding work type, location, and duration is mandatory; failure to comply will result in immediate termination of employment.

### 7.2. TRANSITION FROM SUBCLASS 417 TO FURTHER SPONSORSHIP

Holders of a 417 visa may be considered for more permanent options (such as Subclass 482 or 407) only if the role represents a genuine business need beyond the temporary nature of the initial visa. Additionally, the Employee must either hold a relevant formal qualification or possess at least two (2) years of relevant work experience aligned with the role. Meeting these criteria enables consideration but does not guarantee a nomination.

Gransolar will not:

- (i) guarantee Visa Sponsorship prior to the actual commencement of employment; or
- (ii) extend employment beyond the 417 visa limits if doing so would be unlawful.

### 7.3. SUBCLASS 407 (TRAINING VISA)

This subclass is intended for genuine training positions with clear learning outcomes.

Employees may be considered if they:

- (i) have 12 months of valid visa remaining at the time of nomination to allow for processing;
- (ii) meet English language requirements; and
- (iii) have qualifications aligned with the proposed training.

Visa Sponsorship is contingent upon Gransolar's ability to meet all training and reporting obligations.

#### **7.4. SUBCLASS 482 (TEMPORARY SKILL SHORTAGE VISA)**

The 482 visa is utilized to address genuine skill shortages where local workers are unavailable.

The Employee with this visa must work only in the nominated occupation, meet all skilled occupation list requirements, and comply with all visa conditions, including specific work locations and duties.

Gransolar will comply with all reporting and legislative requirements, ensure employment terms meet the Temporary Skilled Migration Income Threshold (TSMIT) where applicable, and provide Corporate Health Insurance that meets legislative standards.

#### **7.5. PERMANENT RESIDENCY (PR) SPONSORSHIP (SUBCLASS 186)**

Permanent residency sponsorship is a discretionary tool intended to support long-term workforce stability.

##### Eligibility for PR:

- (i) the Employee must have been continuously employed by Gransolar for at least two (2) years at the time of application;
- (ii) the position must be ongoing, full-time, and strategically aligned with Gransolar's operations; and
- (iii) written endorsement from both Management and the Human Resources Department is required.

Upon the grant of a Subclass 186 visa, the Employee must commit to remaining employed with Gransolar for a minimum of two (2) years from the date the visa is granted (resulting in a total of at least 4 years of service). This commitment does not override Gransolar's right to manage performance or operational requirements.

### **8. FINANCIAL OBLIGATIONS AND REPAYMENT (COST RECOVERY)**

#### **8.1. SPONSORSHIP COSTS**

Gransolar will cover costs associated with employer nomination and visa applications, including government fees, migration agent or legal fees, and required medical or competency tests (e.g., skills assessments or English tests).

#### **8.2. REPAYMENT OF VISA COSTS**

If an Employee resigns or is terminated for cause before completing the agreed commitment period, they may be required to repay all visa-related costs paid by Gransolar, provided such repayment is lawful and does not reduce pay below statutory minimums.

Repayment must be made on or before the final day of employment.

Costs may be recovered via payroll deduction (with prior written consent) or direct reimbursement.

A specific repayment agreement must be signed by the Employee prior to the lodgment of the visa application.

Exceptions to repayment: repayment will generally not be sought if employment ends due to redundancy, serious illness or incapacity, or other exceptional circumstances at Gransolar's discretion.

### 8.3. EMPLOYEE ACKNOWLEDGMENT AND RESPONSIBILITY

All Employees seeking Visa Sponsorship must sign a separate “Visa Sponsorship Agreement” acknowledging all the terms contained in this Policy.

It is explicitly understood that while Gransolar provides administrative and financial support, the ultimate responsibility for complying with Australian immigration law remains with the Employee.

## 9. RELATED INTERNAL REGULATIONS

### 9.1. 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.

### 9.2. 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.

### 9.3. 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.

## 10. RESPONSIBLE DEPARTMENT

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

## 11. COMMUNICATION

### 11.1. 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.

## **11.2. EXTERNAL COMMUNICATION**

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

## **12. 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.

## **13. 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.

## **14. ADDITIONAL PROVISIONS**

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



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