

# CODE OF PROFESSIONAL ETHICS

**greenyellow**  
*SHIFT TO PROFITABLE ENERGY!*

EXTERNAL VERSION



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# Glossary

**Public official:** Any person representing a government institution, a political party, an entity owned or/and controlled by a State, a public body, and any person holding a position in an administrative, judicial or military office.

**Conflict of interest:** A situation in which a person's personal interests, such as financial, professional or personal interests, conflict with professional, fiduciary or public duties.

**Corruption:** Misuse of power for personal gain or to obtain an illegitimate advantage.

- Active bribery: The act of granting an advantage to a natural or legal person, public or private, so that this person performs or refrains from performing an act.

- Passive bribery: Agreeing to perform an act, or not, in exchange for an advantage.

**Ethics Officer:** Person designated in our subsidiaries to act as a referent for our ethics alert line.

**Discrimination:** Unfair or prejudicial treatment based on differences such as race, gender, religion, etc.

**Due diligence:** Process of careful examination and assessment of risks prior to validating the commitment to a transaction or share.

**President Fraud:** A type of fraud in which a con artist impersonates a senior corporate officer in order to convince an employee to transfer funds.

**Hacking:** Compromising the security of a computer system, often with the aim of gaining access to confidential information or causing damage.

**Harassment:** The act of annoying or intimidating someone.

**Company - Group:** Refers to GreenYellow and its French and foreign entities, controlled directly or indirectly (within the meaning of article L233-3 of the French Commercial Code).

**Lobbying:** The act of persuading or influencing decision-makers, particularly political decision-makers, by a private or public actor, with the aim of modifying, abolishing or creating legislative and regulatory standards designed to defend specific interests.

**Facilitation payment:** Payment made to facilitate a process or operation, often associated with corrupt practices.

**PEP - Politically Exposed Person:** An individual who holds or has held high-level positions in government or international organizations, and who is subject to increased risks of corruption or money laundering because of his or her position (President, Minister, Mayor, Director of a public company, etc.). Family members, friends or close associates of the PEP will also be considered as such.

**Phishing:** Technique used by hackers to obtain confidential or sensitive information in order to perpetrate identity theft.

**Bribe:** Illegal payment intended to influence a person in a position of authority.

**CSR (Corporate Social Responsibility):** Companies' commitment to acting ethically and making a positive contribution to society in general (beyond their mere legal or economic obligations), as well as to sustainable development.

**Third party:** Any individual or legal entity having a relationship with GreenYellow, such as suppliers, clients, service providers, intermediaries, etc.

**Influence peddling:** Exerting pressure to obtain advantages or favors, using a privileged status. -Active influence peddling: Asking one person to use his or her influence over another in order to obtain a favorable advantage or decision; -Passive influence peddling: The act of accepting consideration and exerting one's influence.

## Introduction

*GreenYellow, a French company founded in 2007, is a major player in the energy transition in France and abroad, and a true energy partner for businesses and local authorities.*

*As an expert in decentralized solar production, energy efficiency projects, energy services and electric mobility, GreenYellow supports its clients across the entire value chain, offering them 100% financed solutions to accelerate their decarbonization.*

*At GreenYellow, ethics are embodied not only in our business, but also in our commitment to doing business transparently and fairly.*

### A word from Otmane HAJJI, Founding CEO



*Compliance with our code of conduct and ethical principles is fundamental to our development, both in our strategic priorities and in our current and future transformations. It is an essential pillar that ensures our employees and partners full support in reporting any ethical or compliance issues. **Transparency and trust are at the heart of our ethical approach, essential to our reputation and values, guaranteeing a healthy, sustainable, and exemplary business.***

*The Comex<sup>1</sup> is committed to upholding these principles, promoting practices that comply with our ethics policy, and ensuring that they are applied. We encourage you to do the same, and to promote this attitude in all your interactions.*

### A word from Thomas PROD'HOMME, Group General Counsel and Group Ethics Officer

*Our strong ethical culture is one of the pillars of GreenYellow. Beyond mere regulatory requirements or recommended practices, **this culture is deeply rooted in our corporate values and mission.** Our **commitment to a sustainable planet, as well as our desire to maintain long-term relationships of trust with our clients,** remind us of the importance of this culture every day. As an operator committed to the long term, it guides us in our behavior, our choices and our interactions with our stakeholders, both internal and external.*

***This Code of Conduct is intended to be one of the fundamental ingredients of our ethical principles, and to guide our actions in a constantly changing and complex world.** It serves as our compass, enabling us to stay true to our principles and values, regardless of location or sector of activity, and to draw a clear line of conduct, both locally and internationally.*

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<sup>1</sup> GreenYellow Executive Committee

# I. Our commitments & actions

## 1. Listening to and protecting our employees

### The fundamentals

The GreenYellow Group is committed to respecting labor laws in all the countries in which it operates. To this end, we are committed to respecting the conventions of the International Labor Organization, the Declaration of Human Rights and local regulations.

### GreenYellow against child labor and forced labor

- GreenYellow ensures that it never employs minors in its activities, nor in those of its subcontractors and suppliers, regardless of the country in which the Group operates.
- GreenYellow bans the use of forced or concealed labor and refuses to enter into commercial relations with partners (suppliers, subcontractors, etc.) who resort to such practices.
- In its business activities and in the choice of its partners, GreenYellow takes care to proscribe all forms of forced, concealed, coerced, or threatened labor.

### GreenYellow against harassment and discrimination

No form of discrimination is tolerated in recruitment or in the performance of our activities.

Nor any form of harassment (moral, professional, sexual).

Discrimination refers to any form of difference in treatment made between several people on the basis of criteria such as age, gender, state of health, sexual orientation or origin.

Harassment is defined as a set of repeated words and/or actions aimed at degrading, isolating or humiliating a person. Sexual harassment is the repeated imposition of comments and/or behavior with a sexual connotation.

You can also make a report via the Group's ethics alert line:  
[https://whistleblowersoftware.com/secure/GreenYellow\\_Ethical\\_Line](https://whistleblowersoftware.com/secure/GreenYellow_Ethical_Line)

For all cases of harassment, know that the CSE is there to listen to you. and that one of its members has the status of sexual harassment referent.

## Safety at work

Safety, both mental and physical, is essential to maintaining good working conditions. GreenYellow imposes strict safety requirements on its worksites, including detailed specifications for equipment. The HSE department has drawn up GOLDEN RULES: safety norms and standards to be respected. Regular checks are carried out to ensure compliance with these standards.

**In 2023, 558 audits were carried out at our sites to ensure compliance with HSE regulations.**

**100% of the actions identified were resolved within the allotted time.**

Each of us is also responsible for reporting any incident or accident so that it can be investigated and resolved promptly, thus ensuring the safety of our employees and contractors. This level of vigilance and daily monitoring enables GreenYellow to guarantee a safe working environment for all.

## Protecting the physical health of our employees is a priority, but so is protecting their mental health!

To promote the well-being of our employees, we value the balance between professional and personal life. Telecommuting and flexibility offer everyone the opportunity to develop both professionally and personally. This approach is at the heart of our commitment survey at GreenYellow.

**GreenYellow conducts employee engagement surveys to find out how its teams feel about their working conditions and their professional and personal fulfillment.**

**In 2023, among 92% of participants, 73% said they were committed to GreenYellow.**

## IT security

### 2024 PHISHING TEST CAMPAIGN

**1068 participants out of 1198 tested.**

The use of IT tools is essential to our work.

In view of today's ever-increasing risks (hacking, phishing, president fraud, etc.), GreenYellow is equipped with the tools and experts needed to ensure IT security.

To this end, security policies and charters are published and regularly updated, employees receive training, and awareness campaigns and tests are carried out.

Violating or ignoring these rules can have major consequences for the company: leakage of (sensitive) data, hacking into our systems, identity theft, and so on.

*That's why it's so important for every employee to adopt the appropriate security measures by using their IT equipment responsibly: don't connect to unsecured networks with your work computer (such as in airports or railway stations), remain vigilant in the event of unusual e-mail or telephone solicitations, especially in cases of apparent urgency, never leave your computer or documents unattended, be wary of unknown e-mail attachments, and so on.*

## Data protection

Third parties, employees, job applicants, service providers and other partners are entitled to respect for their privacy and the protection of the data they entrust to us.

GreenYellow is committed, in accordance with applicable laws, to respecting your rights regarding the collection, processing, distribution and storage of data.

If you have any questions on this subject, please do not hesitate to contact our Data Protection Officer at the following address: [dpo@greenyellow.com](mailto:dpo@greenyellow.com)

## Ethics alert line

We encourage our employees and third parties to communicate and be transparent when they encounter dangerous or illegal situations in the course of their work with GreenYellow. If this is the case, you can turn to your line manager, your compliance officer, the legal department or your CSE.

A dedicated Ethics Alert line is also available. Induced by the Sapin II Act, this dedicated line enables anyone to report facts or failings that could constitute a crime or offence: corruption, discrimination, harassment, misuse of corporate assets, etc.

GreenYellow has chosen a secure and independent platform to process the reports received. You can access it via the following link:

[https://whistleblowersoftware.com/secure/GreenYellow\\_Ethical\\_Line](https://whistleblowersoftware.com/secure/GreenYellow_Ethical_Line)

### How does it work?

1. Click on the link: [https://whistleblowersoftware.com/secure/GreenYellow\\_Ethical\\_Line](https://whistleblowersoftware.com/secure/GreenYellow_Ethical_Line)
2. Let the questions guide you and choose between anonymous or confidential mode.
3. Keep the unique login link to track the progress of your report.

### Who processes your report?

The internal alert system is global and widespread, and can be accessed via a single link, no matter where you are.

For greater independence and responsiveness, a Compliance Officer has been appointed in each of our BUs, enabling every employee to have a dedicated contact. The reporting procedure is also adapted to local law in each of our BUs.

Your ethics officers will deal with your report within a reasonable timeframe, in a totally impartial and independent manner.

You will be kept informed of the progress of your report via the platform.

### What's in it for me?

Being alerted to issues that could adversely affect the working conditions of our employees or partners enables the company and its managers to implement the necessary corrective measures to the situations reported.

### Whistleblowers and the absence of reprisals

Whistleblowers who report, in good faith, any violations of the rules of the present Code or of international laws, by following the procedure indicated, will not be subject to reprisals.

According to the "Waserman" law of March 21, 2022, reprisals are measures taken by a manager, colleague, director or company against a whistleblower. In concrete terms, this can take the form of discrimination, harassment (moral, on social networks, etc.), blacklisting someone by other companies, etc.

The author of a report may never be penalized for having fulfilled his or her duty to report, even if the report turns out to be unfounded or unsubstantiated. However, any slanderous or malicious accusations will result in disciplinary action or legal proceedings.

## 2. Transparency with our suppliers, clients and partners

Relationships **with third parties are essential to the company**, but they are also its biggest risk, particularly in terms of corruption.

As a reminder, bribery is any action by which a person, invested with a public or private function, **solicits or accepts** a gift, an offer or a promise, with the aim of **performing, delaying or refraining from performing an act**, which in a direct or indirect way falls within the scope of his functions.

Corruption can be passive (agreeing to perform or not to perform an act in exchange for an advantage) or active (granting an advantage to a natural or legal person, public or private, so that this person performs or refrains from performing an act).

Corruption is a criminally reprehensible act, even more when it involves a public official.

**Corruption is prohibited because it restricts access to employment or education, leads to unstable politics and governance, reinforces inequality, and encourages crime and the financing of terrorism.**

France is not alone in punishing corruption. Moreover, the law allows several jurisdictions to prosecute the same individual or legal entity for the same acts of corruption in a given territory.

### Some examples of the different forms of corruption

**Bribe:** *On a business trip, you commit a traffic offence and offer money to a police officer to avoid a fine.*

**Facilitation payment:** *To obtain a building permit more quickly, you pay an administrative agent to process your file on a priority basis.*

**Influence peddling:** *You know a high-ranking government official personally. He or she uses his or her influence to delay the passage of a law that could harm your business.*

### Condemnation example

Fines imposed by various jurisdictions (France, United States, United Kingdom) on an airline group for bribery of public officials and foreign agents.

To avoid prosecution, a public interest judicial agreement (CJIP) was concluded on two occasions, the first of which will cost the company 2.1 billion euros in fines, the second 15.8 million.

In order to maintain legal and ethical standards while carrying on its business, GreenYellow is building and improving its compliance program on a daily basis, which includes the following topics:

### Due diligence on our partners

To combat corruption, GreenYellow implements various procedures and checks before entering into business relations with its clients, suppliers, intermediaries and so on.

In accordance with the obligations of the "Sapin II" law and GreenYellow's desire to maintain ethical and sustainable business relationships, a specific procedure has been created within the company to treat each of our third parties on an equal footing.

A verification procedure has been put in place, during which we carry out checks and submit questionnaires as well as our compliance documents. This procedure enables us to assess the risk that a third party may represent. We also carry out anti-corruption audits in connection with mergers and acquisitions.

It is important for GreenYellow to continue to operate with partnerships that do not jeopardize either the company or the public interest. To this end, we favor partners whose compliance and ethical requirements are genuine and in line with our own.

### Registry & gift policy

Business courtesy and corruption are separated by a very fine and sometimes barely perceptible line. To authorize and maintain business courtesies, a policy has been issued to employees, and a register is kept and analyzed every six months.

GreenYellow has set different thresholds requiring employees to declare gifts and invitations offered or received to their line manager and/or compliance officer, depending on the amount.

GreenYellow does not tolerate corrupt practices and will not accept any gifts or invitations made in the expectation of a quid pro quo. Such behavior could result in termination of the contract.

### Corruption risk mapping

GreenYellow fights corruption, money laundering and the financing of terrorism. That's why we've drawn up a corruption risk map to give us an overall view, but also to identify specific situations that could expose us to such risks.

In this way, the mapping of corruption risks enables us to update, improve or modify the systems already in place; in particular, systems designed to evaluate our third parties, select them or guide their relations.

### Managing conflicts of interest

Conflicts of interest arise when an employee's interests conflict with those of the Group for which he or she works, with influencing or even corrupting his or her decisions or actions.

Conflicts of interest often enable third parties to gain undue advantage: obtaining a tender without competition, recruiting an employee without an interview, selecting a supplier without respecting criteria, etc.

Conflicts of interest, in addition to affecting impartiality, can also impact on the quality of the final work. This is why only objective criteria should guide the selection of suppliers or collaborators.

GreenYellow asks its employees to avoid any conflict of interest and, if necessary, to declare it immediately, in order to assess whether this conflict of interest represents a risk to the company and its integrity.

The relevance of the relationship and the decision-making power of the people involved in the conflict of interest are the main criteria for assessing this risk.

It is recommended that the people most exposed to this risk (directors, chairman, etc.) make an annual declaration of conflict of interest.

**Transparency with our third parties is central. It is not only part of our compliance program, but also at the heart of our convictions.**

## Free and fair competition

GreenYellow values both the "spirit of conquest" and strict compliance with regulations, as well as loyalty to all market players, which is an essential part of our values.

Therefore, GreenYellow prohibits any illegal act or any act that could be considered as unfair competition within the framework of its activity.

### Example

**Illicit cartel:** Any agreement between companies or associations of companies whose purpose is to limit, restrict or distort competition in a market.

In 2023, the French competition authority (Autorité de la Concurrence) penalized several companies in the nuclear sector for colluding in calls for tender; a total of **31,239,000 euros in fines** was imposed on the protagonists.

## Political financing

In France, as in other countries, it is strictly forbidden for a legal entity to finance the candidacy of a politician and/or political parties.

The GreenYellow Group does not finance, either directly or indirectly through associations, any political party or individual.

## Use of intermediaries

Intermediaries - intermediaries who enable two parties to do business with each other - are important to GreenYellow: they prospect and put us in touch with future clients. For example, when we enter a new geographical area or market.

Relations with intermediaries are strictly regulated, and are subject to a selection and validation procedure, as well as frequent re-evaluation.

### So, what should we look out for when dealing with a business introducer?

- The beneficial owners, shareholders or directors of the business introducer company are subject to sanctions or convictions for corruption, money laundering or terrorist financing.
- The business introducer maintains relations with public entities (public agent, PEP, etc.).<sup>2</sup> and PEP relatives included).
- No information is available on the business contributor or his company.
- The terms of payment proposed by the business introducer are not acceptable: cash, payment into an account in a tax haven, etc.
- The business introducer refuses to comply with anti-corruption regulations.
- The business introducer refuses to sign our compliance documents.

All relationships with business introducers must be covered by a contract, approved by the Legal Department and/or the Head of Compliance.

The terms of remuneration for business introducers are also defined in advance, in order to establish a principle of equality and transparency with regard to our various intermediaries, but also to avoid any form of corruption.

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<sup>2</sup> Politically Exposed Person

## Lobbying activity

Lobbying is the act of persuading or influencing decision-makers, particularly political decision-makers, to modify, abolish or create legislative or regulatory standards, in order to defend specific interests.

This influence can be exerted by companies directly, or indirectly through groups of people, associations, etc. Of course, GreenYellow has a vested interest in promoting its business to political decision-makers, so that they can encourage regulations concerning the installation of photovoltaic panels, for example.

Although lobbying can legitimately provide diversity in the democratic process, it carries risks, notably that of altering fairness and transparency in public decision-making, favoring certain interests to the detriment of the general interest, and increasing inequalities of access to decision-making processes. It is therefore imperative that any lobbying activity be conducted with integrity, transparency and respect for ethical principles.

Necessary recommendations include full and public disclosure of lobbying activities, limiting conflicts of interest, adopting responsible lobbying practices, and ensuring that decision-making processes remain open, inclusive and well-founded.

In France, the Sapin II law and the Haute Autorité pour la Transparence de la Vie Publique (HATVP) impose certain principles. Those engaged in lobbying activities are referred to as "interest representatives". These representatives must register on the national register of interest representatives and declare their lobbying activities with public decision-makers.

In the same vein, a European register has been set up, enabling European institutions to keep better track of lobbying players and actions.

### What are good lobbying practices?

- Register on national or European registers.
- Declare lobbying activities and make them public for greater transparency.
- Prohibit any corrupt, unfair or anti-competitive practice designed to influence the decision of a public decision-maker.
- Do not use fraudulent means to obtain confidential information,
- Ensure that the organizations or associations representing our interests comply with regulations on lobbying and corruption.
- Do not indirectly finance, via associations, the political campaign of decision-makers in order to obtain a decision in your favor.

The company may also decide to use a third party to represent its interests, through a lobbying firm for example. If the Group engages the services of a third party for lobbying purposes, it must ensure that the latter conducts its activity in compliance with the laws in force.

When using a third party who is a former political leader or elected official, a certain period (minimum 3 years) must have elapsed between the end of his or her term of office and the start of his or her lobbying activity.

When using a third party, GreenYellow prohibits the following profiles:

- A representative of interest who refuses to provide references and/or the tools with which he operates.
- The representative of interest who refuses to subscribe to our compliance clauses.
- Interest representatives who refuse to register on national and European registers.
- An interest representative who has already been convicted of corruption or illegal party financing, for example.

## Patronage & Sponsoring

Patronage and sponsorship are operations that enable a company to finance or help important causes or events. However, these operations can conceal a very different reality when the initiative is ill-intentioned: money laundering, corruption, financing of illicit activities, etc.

### Sponsorship

Material or financial support provided, without direct consideration, to a charity or individual for the performance of activities of general interest.

### Sponsorship

Material or financial support for an event which, in return, provides promotion and visibility for the sponsor.

GreenYellow has established a clear procedure for sponsoring without this risk.

Potential sponsorship projects must first of all be in line with GreenYellow's values and objectives and be free from conflicts of interest or influence peddling.

We also verify that the transaction will be carried out for the benefit of an organization whose probity and integrity do not present any ethical, financial or commercial risk for GreenYellow. To do this, we analyze not only the entity targeted by the transaction, but also its managers, beneficial owners, etc.

Finally, we check that the amount of the operation is proportionate to the nature of the event or the support granted to the beneficiary.

In addition, thresholds have been set, and a validation process and controls have been put in place to provide the best possible framework for the operation.

In this sense, GreenYellow can issue a refusal:

- When the transaction is a condition for maintaining, signing or renewing a contract,
- When the beneficial owners, directors or managers are subject to criminal convictions or have been called into question by regulatory bodies (Autorité de la Concurrence, Cour des Comptes, etc.),
- When there is a risk of misappropriation of funds,
- When the employee who initiated the operation derives a personal benefit from it,
- When the sponsoring operation is contrary to the Group's marketing and communications policy.

## Intellectual and industrial property

Intellectual property is a right divided into two branches: the first governs literary and artistic works, while the second governs industrial property, which is designed to protect **commercial or industrial creations, ideas and inventions**.

Inventions and creations can constitute real assets or mark one's identity. It is therefore essential for GreenYellow to respect laws and regulations relating to intellectual property, copyright, patents, trademarks and trade secrets.

It is in this context that all employees are asked to take all possible steps to protect the confidentiality of information made available to them by the Group.

In the same way, the GreenYellow Group **prohibits the unfair or illegal obtaining of information about its competitors, clients or suppliers**.

### 3. Our environmental and social commitments

As a direct contributor to the fight against global warming, GreenYellow is committed to respecting regulations and laws that protect the environment and local communities.

Our Shift solutions platform enables you to play an active part in reducing greenhouse gas emissions: installation of photovoltaic panels, energy efficiency solutions, electric vehicle recharging infrastructure, EEA or car-sharing bonuses, etc.

Our solutions show that it is possible to consume less, while improving or maintaining our quality of life. These solutions also respond to the planet's various needs (rising electricity prices at certain times, recurring power cuts, etc.).

The Group strives to limit the impact of its activities. That's why we don't build our power plants on land that is suitable for building or cultivation, and why we carry out impact studies to ensure that our construction sites respect the flora and fauna. We are also committed to managing the water and waste from our sites, and to protecting animals and their living conditions.

#### In concrete terms, CSR at GreenYellow means:

- Preserving the planet's natural resources,
- Support and take action against global warming,
- Collaborate with local and national institutions to encourage the development of sustainable, environmentally-friendly activities and facilities,
- Solve local problems and develop sustainable solutions that respect communities, their customs and environments,
- Develop partnerships with local players,
- Promoting cohesion and diversity,
- Ensuring the health and safety of our employees in their working conditions.

The Group is also aiming to achieve "Net Zero" carbon neutrality for scopes 1 and 2 by 2040.

## Impulse positive change!

#### Our planet

##### ACT RESPONSIBLY TOWARDS THE ENVIRONMENT

- Support the fight against global warming
- Contribute to the preservation of natural resources and biodiversity
- Foster and encourage environmental consciousness



#### Local populations & Institutions

##### SUPPORT THE DEVELOPMENT OF LOCAL INSTITUTIONS AND POPULATIONS

- Collaborate with local and national institutions
- Integrate to support local development
- Develop partnerships for local solidarity



#### Our business partners

##### ESTABLISH SUSTAINABLE ETHICAL AND TRANSPARENT PARTNERSHIPS

- Encourage responsible energy use
- Strengthen ethics and compliance across our value chain
- Become an actor and ambassador of a responsible supply chain
- Inform our stakeholders of our CSR roadmap and results



#### Our people

##### DEVELOP AND VALUE OUR TEAMSWHILE ENSURING THEIR HEALTH AND SAFETY

- Foster cohesion and promote diversity
- Provide our employees with dynamic career opportunities
- Foster a health & safety based work atmosphere
- Nurture our human capital



## 4. Our commitments to the authorities

### Accuracy of our accounts

We also consider our integrity to be linked to our commitments to the authorities and our fight against fraud. At GreenYellow, we are committed to ensuring the accuracy of our accounting and financial reporting by maintaining accounting records that comply with applicable laws and regulations.

### Non-financial reports

The European Commission has adopted the "Corporate Sustainability Reporting Directive", requiring companies to reflect on the principle of double materiality, which means: transparently demonstrating the impact of our activity on stakeholders, but also the impact of stakeholders on our activity.

Our activities are governed by this thinking, and our CSR team complies with this new directive.

GreenYellow is committed to total transparency by providing accurate and complete information to all its stakeholders, including the authorities.

In the event of a request for information or documents by an authority, arising from regulatory action or ongoing litigation, whether informal, in the form of a subpoena or search warrant, the Legal Department must be notified immediately.

### Fighting corruption

The so-called Sapin II law requires companies to set up a compliance program, including:

- Adoption of a Code of Ethics,
- Corruption risk mapping,
- Evaluating our third parties,
- Employee training on the risk of corruption,
- Anti-corruption accounting controls,
- Adoption of a disciplinary system,
- The implementation of internal controls,
- Setting up an internal alert system.

The GreenYellow Group constantly adjusts its anti-corruption policies to take account of the risks inherent in its activities and the regions in which it operates.

In its quest for a cleaner future, GreenYellow is committed to eliminating all forms of corruption and bribery within the Group.