



Code of

# Conduct & Ethics





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**Thalia Valkouma**  
President & CEO

**Dimitris Kintsakis**  
Vice President & CEO

# 1. Message

from our **CEOs**

At **Faria Renewables**, we believe that energy derives its true value from the people who create it and use it. For us, **sustainable development** is not limited to capacity targets or the size of our portfolio; it is primarily reflected in the way we **operate, collaborate,** and **make decisions** every day.

Our **Code of Ethics** sets out the core principles that guide us: **integrity, transparency,** and **respect for people, the environment,** and **local communities.** It represents our steadfast commitment to **responsible practices** that foster trust and serve as a shared point of reference for all of us, regardless of role or position.

In an industry undergoing rapid transformation, **responsibility** and **ethical business conduct** are just as vital as **innovation** and **technical expertise.** Every project we deliver and every partnership we build must reflect these values—values that have long defined who we are—and our **commitment to long-term, balanced, and sustainable progress.**

We are particularly proud of the **Faria Renewables team.** Our people embody our philosophy and bring to life everything we stand for through their everyday actions.

With **respect, trust,** and a **shared vision for the future,** we continue to **move forward—continuing to share energy.**



# 2. Introduction & Purpose



At **FARIA Renewables S.A.**, our mission extends beyond delivering **renewable energy solutions** – it is about doing so with integrity, responsibility, and respect. This Code of Conduct & Ethics sets the standards for **ethical behavior, compliance, and professionalism** that we expect from everyone representing **FARIA Renewables**.

This Code applies to all employees, executives, contractors, consultants, suppliers, and partners, across all countries where we operate. It reflects our commitment to:

- Ethical excellence in every decision.**
- Alignment with our ESG Policy and international standards.**
- Full compliance with national, EU, and international laws.**



# 3. Our Core Values

We are guided by the following values:

## Integrity

– Acting honestly and ethically at all times.

## Accountability

– Taking ownership of our actions and their consequences.

## Transparency

– Communicating truthfully and openly.

## Respect

– Treating everyone with dignity and fostering inclusion.

## Sustainability

– Protecting the planet and acting for future generations.

## Excellence

– Pursuing innovation, quality, and continuous improvement.

# 4. Scope of Application

Applies to all FARIA Renewables staff, management, contractors, consultants, suppliers, and external partners, in all operations and locations.

**Compliance is mandatory.**



# 5. Compliance with Laws and Regulations

We comply fully with: **National, EU, and international laws. Renewable energy regulations, permits, environmental terms, and health & safety requirements.**

## Acceptable Behavior:

- Verifying legal and regulatory requirements before starting any project.
- Consulting Legal/Compliance when uncertain about requirements.
- Keeping all permits and licenses updated and accessible.

## Unacceptable Behavior:

- Ignoring permit requirements to save time.
- Proceeding with activities known to violate laws or regulations.
- Falsifying compliance documentation.

## What to do if:

- If unsure about legal requirements: contact the Legal/Compliance Department immediately.
- If you notice potential non-compliance: stop the activity and report to your line manager.

# 6. Business Ethics & Anti-Corruption

# 7. Fair Labor Practices & Human Rights



Zero tolerance for **bribery, corruption, fraud, or conflicts of interest.** All dealings must be **transparent** and **documented.**

## Acceptable Behavior:

Disclosing potential conflicts of interest before engaging in business discussions.  
Politely refusing gifts or entertainment that could influence a decision.  
Ensuring all transactions are documented and approved.

## Unacceptable Behavior:

Offering or accepting bribes or Facilitation payments.  
Falsifying documents or concealing material information.  
Concealing information from stakeholders.

## What to do if:

- If offered a bribe or improper gift: politely refuse and report immediately to Compliance.
- If you suspect corruption: gather facts and use whistleblowing channels.

We respect all **human rights** and **fair labor standards.**

## Acceptable Behavior:

Providing equal opportunities in hiring and promotion.  
Reporting harassment, discrimination, or unsafe working conditions immediately.  
Respecting collective bargaining and labor agreements.

## Unacceptable Behavior:

Discriminating against someone due to gender, race, religion, age, disability, or sexual orientation.  
Ignoring reports of harassment or unsafe practices.  
Using suppliers who violate labor rights.

## What to do if:

- If you witness discrimination or harassment: document the incident and report to HR immediately.
- If unsure about supplier labor practices: request an audit or compliance confirmation.



## 8. Health, Safety & Environmental Responsibility (HSE)

Safety and environmental stewardship are non-negotiable.

### Acceptable Behavior:

Following all safety protocols and wearing protective equipment.

Minimizing waste and following environmental protection measures on site.

Reporting hazards, spills, or unsafe practices immediately.

### Unacceptable Behavior:

Ignoring safety procedures to meet deadlines.

Disposing of materials in ways that harm the environment.

Failing to report environmental incidents.

### What to do if:

- If you see an unsafe condition: stop work and alert the site supervisor.

- If an environmental incident occurs: activate emergency procedures and notify HSE team.

## 9. Protection of Company Assets & Confidentiality

We safeguard all company property, information, and data.

### Acceptable Behavior:

Using company resources responsibly and for work purposes only.

Protecting confidential data in line with GDPR requirements.

Keeping passwords and security credentials secure.

### Unacceptable Behavior:

Sharing confidential information without authorization.

Using company property for personal gain.

Accessing systems or files without permission.

### What to do if:

- If you suspect data loss or breach: contact IT Security immediately.

- If you find lost or unattended company property: return it to the relevant department.

# 10. Relations with Stakeholders

We build trust through honest and respectful engagement.

## Acceptable Behavior:

Providing accurate and timely information to authorities, communities, and investors.  
Addressing concerns in a respectful and solutions-oriented manner.  
Engaging in active listening during community consultations.

## Unacceptable Behavior:

Misrepresenting company activities to gain local acceptance.  
Ignoring or dismissing stakeholder feedback.  
Failing to respond to reasonable stakeholder inquiries.

## What to do if:

- If a stakeholder raises a concern: acknowledge it promptly and escalate to the relevant department.
- If unsure how to answer a stakeholder question: seek guidance from Communications or Legal.

# 11. Monitoring & Enforcement

Management is responsible for enforcing this Code. Violations will lead to disciplinary action, up to termination of employment or contract. The Code is reviewed regularly and updated as needed.

## Acceptable Behavior:

Applying the Code equally to all employees and partners.  
Regularly reviewing practices to ensure compliance.  
Documenting corrective actions after violations.

## Unacceptable Behavior:

Applying the Code selectively or unfairly.  
Failing to act on known violations.  
Neglecting to update the Code when laws or standards change.

## What to do if:

- If you notice inconsistent enforcement: raise the issue with senior management.
- If you find outdated policies: recommend updates to the Compliance team.

# 12. Use of Technology & Social Media

Employees representing the company must use email, internet, and social media responsibly. Confidential information must never be shared online. Adhering to these principles protects the company's reputation and ensures professional, secure communication.

## **Acceptable Behavior:**

Use company email and internet responsibly for business purposes; respect IT and security protocols.

## **Unacceptable Behavior:**

Posting confidential company information on social media; making offensive or discriminatory comments that harm the company's reputation.

## **What to do if:**

Report any misuse or violations to IT or HR immediately.

# 13. Data Privacy & Cybersecurity

Employees must handle personal data of colleagues, clients, and partners with the utmost care and confidentiality. Any phishing attempts, cyber threats, or security incidents must be reported immediately according to company procedures to safeguard information and maintain trust.

## **Acceptable Behavior:**

Handle personal data of employees, clients, and partners in compliance with GDPR; use strong passwords; report suspicious emails or activity.

## **Unacceptable Behavior:**

Storing company data on personal devices without authorization; sharing login credentials; ignoring phishing attempts.

## **What to do if:**

Immediately report suspected phishing, breaches, or cyber incidents to the IT Department.

A background image showing a modern office interior with large glass windows. Several business professionals in business attire are engaged in a meeting, looking at documents and talking. The scene is brightly lit, suggesting a high-rise office environment.

## 14. Gifts, Hospitality & Entertainment

Employees must not accept gifts or benefits exceeding defined monetary limits. Any gift above these thresholds must be declared or politely refused to avoid conflicts of interest and maintain transparency.

### **Acceptable Behavior:**

Modest, symbolic gifts (e.g., branded items) or reasonable business meals within set limits

### **Unacceptable Behavior:**

Cash gifts, lavish entertainment, or high-value gifts intended to influence business decisions.

### **What to do if:**

Declare any gifts or hospitality to Compliance or HR if uncertain or if exceeding limits.

## 15. Conflict of Interest

Employees must avoid personal relationships, outside employment, or financial interests that could affect business decisions. Any actual or potential conflicts must be promptly declared to ensure transparency and maintain trust.

### **Acceptable Behavior:**

Disclose any personal, financial, or family relationships that may affect impartial judgment.

### **Unacceptable Behavior:**

Concealing personal interests, hidden partnerships with competitors, or awarding contracts to relatives without disclosure.

### **What to do if:**

Complete a Conflict of Interest Declaration Form and submit to HR/Compliance.

# 16. Non-Retaliation Policy

# 17. Training & Awareness



Retaliation against anyone who raises a concern will be treated as a serious violation of this Code.

All employees will receive training on the Code of Conduct, with periodic refresher sessions to ensure ongoing awareness and understanding. For any questions or clarifications regarding the Code, employees are encouraged to contact [appropriate department/contact person].

## Acceptable Behavior:

Encourage reporting of concerns in good faith and protect those who do so.

## Unacceptable Behavior:

Retaliating against or penalizing anyone who reports concerns honestly.

## What to do if:

Report retaliation immediately to HR or Compliance. Retaliation will itself be treated as a serious violation.

## Acceptable Behavior:

Participate actively in Code of Conduct and Ethics training sessions and refreshers.

## Unacceptable Behavior:

Ignoring training requirements or failing to apply knowledge gained from training.

## What to do if:

For questions about training or interpretation of the Code, contact HR, Compliance, or the ESG Committee.

# 18. Diversity, Equity & Inclusion (DEI)

The company is committed to fostering an inclusive environment where all employees are treated fairly and with respect. Equal opportunities are provided regardless of gender, race, religion, disability, or any other protected characteristic.

## Acceptable Behavior:

Treat all colleagues with dignity and respect; promote equal opportunities and an inclusive culture.

## Unacceptable Behavior:

Discrimination, harassment, or exclusion based on personal characteristics such as gender, race, religion, or age.

## What to do if:

Report incidents to HR or the DEI Officer immediately.



# 19. Declaration of Commitment

All employees, contractors, and key partners must sign a declaration confirming understanding and compliance with this Code.

## Annexes & References

- Glossary of Terms.
- Links to related policies (e.g., Anti-Corruption, HSE, Human Rights).
- Contact sheet with Compliance/HR hotlines, email, external reporting channels.





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renewables



[fariarenewables.com](http://fariarenewables.com)