



# GreenSol Ltd

## **SUPPLIER CODE OF CONDUCT POLICY**

**GSL-QMS-P-33**

# Supplier Code of Conduct Policy \_\_\_\_\_

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|-------------------------------------------------------------------------------------------------------|----------------------------------------------|----------------------------------------|--------------|
|  <b>GreenSol Ltd</b> |                                              | <b>SUPPLIER CODE OF CONDUCT POLICY</b> |              |
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## DOCUMENT CONTROL RECORDS

### REVIEWERS

|                                              |                                |                          |
|----------------------------------------------|--------------------------------|--------------------------|
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| <b>QHSE Reviewed By:</b>                     |                                |                          |
| <b>Name:</b> Amanda Saloman                  | <b>Signature:</b>              | <b>Date:</b> 30/06/2026  |
| <b>Approved By:</b>                          |                                |                          |
| <b>Name:</b> Shaughn Deokiesingh             | <b>Signature:</b>              | <b>Date:</b> 01-Jul-2026 |

### REVISION HISTORY RECORD

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# Supplier Code of Conduct Policy

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## 1. Purpose

The purpose of this Supplier Code of Conduct is to define GreenSol Limited's minimum expectations for ethical conduct, legal compliance, quality, health and safety, environmental responsibility, labour practices, data protection, and responsible business behaviour across its supplier base. This document forms part of GreenSol Limited's supplier qualification, onboarding, performance monitoring, and supplier re-evaluation process.

## 2. Scope

This Code applies to all suppliers, vendors, contractors, subcontractors, freight forwarders, brokers, haulers, service providers, consultants, agents and any other third parties providing goods or services to, or on behalf of, GreenSol Limited.

- The requirements apply to local, regional and international suppliers, including suppliers supporting GreenSol Limited's Trinidad, Guyana, Suriname and Venezuela-related operations.
- Where a supplier uses subcontractors, the supplier is responsible for ensuring that applicable requirements of this Code are communicated to and complied with by those subcontractors.
- Compliance with this Code does not replace any contractual, legal, regulatory, specification, HSE, quality, or client-specific requirement applicable to the supplier.

## 3. Terms and Definitions

**Supplier:** Any external party providing goods, materials, equipment, chemicals, logistics, technical support, professional services, contracted labour or other services to GreenSol Limited.

**Subcontractor:** Any third party engaged by a supplier to perform work or provide goods or services connected to GreenSol Limited.

**Code:** This GreenSol Limited Supplier Code of Conduct.

**Corrective Action:** Action taken to eliminate the cause of a non-conformity or non-compliant condition and prevent recurrence.

**QMS:** Quality Management System; GreenSol Limited's documented system for controlling processes, responsibilities, records and continual improvement.

**Non-Conformance:** Any failure to meet legal, regulatory, contractual, specification, quality, HSE, environmental or Code requirements.

## 4. Responsibilities

- 4.1. **Directors / Country Managers:** Approve the Supplier Code of Conduct and support enforcement where significant supplier risk or non-compliance is identified.
- 4.2. **QHSE & HSE Personnel:** Maintain the controlled document, support supplier compliance reviews, assess HSE / environmental concerns, and verify corrective actions where required.
- 4.3. **Procurement / Supply Chain:** Issue the Code to applicable suppliers, obtain acknowledgements, ensure supplier files are complete, and escalate supplier non-compliance.
- 4.4. **Accounts / Administration:** Support supplier onboarding by confirming that required supplier documentation has been received before supplier set-up or payment processing, where applicable.
- 4.5. **Suppliers:** Comply with this Code, maintain evidence of compliance, flow down applicable requirements to subcontractors, report violations, and cooperate with audits or information requests.

## 5. Supplier Code Requirements

### 5.1. Compliance with Laws and Regulations

- Suppliers shall comply with all applicable laws, regulations, permits, licences, standards and industry requirements in the jurisdictions where they operate or provide goods and services.
- Suppliers shall comply with applicable customs, import/export, sanctions, trade control, tax, labour, environmental, HSE and transport requirements.
- Suppliers shall notify GreenSol Limited promptly where any licence, permit, registration, insurance, certification or authorization relevant to the supply of goods or services becomes expired, suspended, revoked or materially changed.

### 5.2. Ethical Business Practices

- Suppliers shall conduct business with integrity, transparency and accountability.
- Bribery, kickbacks, facilitation payments, fraud, extortion, conflict of interest, falsification of records and other corrupt practices are strictly prohibited.
- Suppliers shall maintain accurate, complete and auditable records for transactions, certifications, deliveries, product quality, chain of custody and services performed.
- Suppliers shall avoid anti-competitive behaviour and shall respect intellectual property, confidential information and proprietary business data.

### 5.3. Labour and Human Rights

- Suppliers shall prohibit forced, bonded, trafficked, involuntary or indentured labour.
- Suppliers shall not use child labour and shall comply with applicable minimum age and employment requirements.
- Suppliers shall maintain a workplace free from harassment, abuse, discrimination, intimidation and retaliation.
- Suppliers shall comply with legally mandated working hours, overtime, wages, benefits and leave requirements.
- Suppliers shall respect legally protected rights of association and employee representation, where applicable.

### 5.4. Health, Safety and Well-being

- Suppliers shall provide safe and healthy working conditions and shall implement controls to identify, assess and reduce occupational risks.
- Suppliers shall ensure that employees and subcontractors are competent, trained and equipped for the work being performed.
- Suppliers shall ensure that employees and subcontractors are fit for work and not impaired by alcohol, illegal drugs, fatigue, medication, illness, or any other condition that may adversely affect safe performance.
- Suppliers shall ensure that personnel are empowered to stop work where unsafe conditions, unsafe acts, environmental risks, or imminent danger are identified until appropriate controls have been implemented.
- Suppliers operating vehicles, mobile equipment, lifting equipment, cranes, forklifts or transportation services shall maintain valid licenses, inspection and maintenance programmes, and ensure

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operators are competent and authorized for the work being performed.

- Suppliers involved in chemical handling, transportation, tank cleaning, warehousing, industrial works or site services shall maintain appropriate HSE controls, PPE, emergency response arrangements and safe work procedures.
- Suppliers shall report significant incidents, near misses, spills, exposures, property damage, regulatory enforcement actions, or other events that may impact GreenSol Limited, its clients, personnel, operations, or reputation as soon as reasonably practicable and no later than twenty-four (24) hours after becoming aware of the event.

### 5.5. Environmental Stewardship and Sustainability

- Suppliers shall comply with environmental laws, permits and waste management requirements applicable to their operations.
- Suppliers shall manage hazardous materials, chemicals, waste, emissions, wastewater and contaminated materials in a manner that prevents harm to people, property and the environment.
- Suppliers shall immediately report environmental incidents, spills, releases, regulatory notices, or enforcement actions associated with GreenSol Limited work, products, or services.
- Suppliers shall use resources responsibly and are encouraged to reduce waste, energy use, water use, packaging impact and greenhouse gas emissions where reasonably practicable.
- Suppliers shall not engage in illegal dumping, unauthorized disposal, uncontrolled release, improper storage or improper transport of hazardous substances.

### 5.6. Product Quality, Safety and Technical Compliance

- Suppliers shall ensure that all products and services conform to agreed specifications, purchase orders, quotations, SDS, COA, PDS/TDS, drawings, procedures, client requirements and regulatory requirements.
- Suppliers shall maintain traceability of materials, batches, lots, manufacturing records, certificates, inspection records and test results where applicable.
- Suppliers shall notify GreenSol Limited immediately of any quality issue, product recall, suspected contamination, incorrect documentation, expired material, specification deviation or change affecting the supplied product or service.
- Suppliers shall not substitute materials, alter specifications, change packaging, change country of origin, change manufacturer, or modify approved supply arrangements without prior written approval from GreenSol Limited.
- Suppliers shall notify GreenSol Limited prior to any significant change to manufacturing processes, formulations, raw materials, packaging, storage conditions, transportation methods, country of origin, ownership, facilities, key personnel, regulatory status, or other changes that may affect quality, safety, environmental performance, compliance, or continuity of supply.

### 5.7. Confidentiality, Data Protection and Information Security

- Suppliers shall protect GreenSol Limited's confidential, commercial, technical, financial, client, supplier and operational information.
- Unauthorized disclosure, copying, distribution or use of GreenSol Limited information is prohibited unless expressly approved in writing.



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- Suppliers shall maintain appropriate safeguards to prevent loss, unauthorized access, cyber compromise or misuse of GreenSol Limited data.

### 5.8. Social Responsibility and Community Conduct

- Suppliers are encouraged to conduct business in a manner that positively contributes to the communities in which they operate.
- Suppliers shall respect the rights, culture, heritage and property of communities, landowners and indigenous peoples where applicable.
- Suppliers may be invited to support GreenSol Limited's approved Corporate Social Responsibility initiatives, where appropriate and voluntary.

## 6. Supplier Monitoring, Review and Audit

GreenSol Limited reserves the right to monitor supplier compliance with this Code through reasonable controls, including but not limited to:

- supplier questionnaires, declarations and onboarding documentation;
- review of licences, permits, insurance certificates, SDS, COA, quality records, calibration records and other relevant evidence;
- review of HSE policies, risk assessments, training records, emergency response plans, incident records, equipment inspection records, maintenance records, vehicle inspection records and other relevant evidence where applicable;
- supplier performance reviews, delivery performance, quality performance, HSE performance, environmental performance, corrective action closure performance and non-conformance trends;
- desktop audits, onsite audits or client-led audit support, where applicable;
- requests for corrective action and evidence of closure within defined timelines.

### QMS Control Point

Supplier compliance evidence shall be retained in the relevant supplier file. Supplier non-conformances shall be recorded, investigated and closed in accordance with GreenSol Limited's non-conformance and corrective action process.

## 7. Non-Compliance and Corrective Action

- 7.1. Any breach of this Code may result in a request for written explanation, corrective action, suspension of purchasing activity, removal from the approved supplier list, contract termination, or escalation to legal/regulatory authorities where required.
- 7.2. Corrective actions shall be proportionate to the risk, severity and recurrence of the issue and shall include responsibility, target date, containment action and long-term preventive action where applicable.
- 7.3. Serious violations include, but are not limited to, bribery, fraud, forced labour, child labour, falsification of documents, serious HSE breaches, illegal disposal, unapproved product substitution and repeated failure to meet quality or delivery requirements.

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7.4. GreenSol Limited reserves the right to suspend supplier activities where an immediate threat to health, safety, environment, product integrity, regulatory compliance, or business continuity has been identified.

### 8. Reporting Concerns and Protection Against Retaliation

Suppliers shall promptly report suspected violations of this Code, unethical conduct, quality issues, unsafe conditions, environmental incidents, fraudulent activity or any matter that may affect GreenSol Limited, its employees, clients, operations or reputation.

- Reports may be made to GreenSol Limited's Procurement / Supply Chain representative, QHSE Coordinator, Corporate Secretary or Country Manager / Senior Management.
- GreenSol Limited will treat good-faith reports with appropriate confidentiality and will not tolerate retaliation against any person who reports a concern in good faith.

### 9. Supplier Acknowledgement and Re-Signing Requirement

9.1. Suppliers shall formally acknowledge understanding and acceptance of this Code by signing the declaration included in Appendix A.

9.2. Continued engagement with GreenSol Limited is conditional upon supplier compliance with this Code and any applicable contractual, legal, regulatory, quality, HSE or client-specific requirements.

9.3. GreenSol Limited may request re-signing of this Code following material changes in the supplier's organization, ownership, service scope, risk profile, legal status, or at least every three (3) years from the previous authorized supplier signature.

### 10. Data Recording

| Record                                          | Owner / Custodian            | Retention / Location            | Control Requirement                                                |
|-------------------------------------------------|------------------------------|---------------------------------|--------------------------------------------------------------------|
| Signed Supplier Code of Conduct                 | Procurement / Supply Chain   | Supplier file / NAS             | Retain current signed copy and previous revision where applicable. |
| Supplier onboarding / approval records          | Procurement / Supply Chain   | Supplier file / NAS             | Maintain evidence used for supplier approval and re-evaluation.    |
| Audit reports / supplier review records         | QHSE / Procurement           | QMS records folder              | Retain findings, actions and closure evidence.                     |
| Corrective action records                       | QHSE / Responsible Function  | NCR / Corrective action tracker | Track ownership, target date, closure and verification.            |
| Licences, permits, insurance and certifications | Procurement / Supplier Owner | Supplier file / NAS             | Review for expiry and validity where applicable.                   |
| Supplier declarations and compliance evidence   | Procurement / QHSE           | Supplier file / NAS             | Maintain as objective evidence for audits and client reviews.      |

### 11. Communication

This Supplier Code of Conduct Policy is communicated to all employees, suppliers, and relevant stakeholders. Compliance with this Code is mandatory for all suppliers, contractors, subcontractors, service providers, consultants and other applicable third parties engaged by GreenSol Limited.



## 12. Document Control and Review

This document shall be reviewed at least once every three (3) years, or earlier where there are material changes to GreenSol Limited's operations, supplier risk profile, legal/regulatory requirements, client expectations, QMS requirements, or internal supplier management controls.

## 13. Training Requirements

| Training                        | Audience           | Duration |
|---------------------------------|--------------------|----------|
| Supplier Code of Conduct Policy | Relevant Personnel | 30 mins  |

## 14. References and Related Documents

| Document No. | Title                            |
|--------------|----------------------------------|
| GSL-QMS-P-33 | Supplier Code of Conduct Policy  |
| GSL-QMS-P-05 | Procurement Management Procedure |
| GSL-QMS-P-13 | Non-Conformance Procedure        |
| GSL-QMS-P-15 | Document Control Procedure       |

- END OF DOCUMENT -

## Supplier Code of Conduct Policy \_\_\_\_\_

### Appendix A - Supplier Declaration and Agreement

As indicated by the authorized signature below, the Supplier confirms that it has read, understood and agrees to comply with the GreenSol Limited Supplier Code of Conduct. The Supplier further confirms that it will communicate applicable requirements to relevant employees, representatives and subcontractors involved in work for GreenSol Limited.

| Field                          | Supplier Completion |
|--------------------------------|---------------------|
| Supplier Company Name          |                     |
| Company Address                |                     |
| Main Contact Name / Email      |                     |
| Authorized Representative Name |                     |
| Title / Position               |                     |
| Signature                      |                     |
| Date                           |                     |

**Supplier Declaration:** I confirm that I am authorized to sign on behalf of the Supplier and that the Supplier agrees to comply with the requirements of this Code.