

**COMPLIANCE ETHICS
OF
EU GREEN ENERGY LLC**

Renewable Energy Solutions – Eolic, Solar, and Hydro Energy Projects

Republic of Albania

5th of December 2025

This document forms an integral part of the Terms and Conditions
and Privacy Policy for the usage of the Website.

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1. PURPOSE AND SCOPE

This Compliance Ethics document establishes the ethical standards, principles, and behavioral expectations that govern all activities of EU Green Energy LLC (hereinafter referred to as "the Company"), its employees, officers, directors, contractors, partners, and all persons acting on behalf of the Company.

This document is drafted in full compliance with and shall be interpreted in accordance with the Terms and Conditions and Privacy Policy for the usage of the Website, as well as all applicable Albanian national legislation, European Union law, and Council of Europe conventions as referenced therein.

As stated in Section 19 of the Terms and Conditions, this Compliance Ethics document, together with the Terms and Conditions, Privacy Policy, and Cookie Policy, constitutes the entire agreement governing the relationship between the Company and its stakeholders.

2. CORE ETHICAL PRINCIPLES

EU Green Energy LLC is committed to upholding the highest ethical standards in all its operations. The following core principles guide our conduct:

1. **Integrity and Honesty:** We conduct all business with complete honesty, transparency, and integrity. We do not engage in deceptive, misleading, or fraudulent practices.
2. **Lawfulness:** We comply with all applicable laws and regulations of the Republic of Albania, European Union directives, and international conventions, including but not limited to the Constitution of the Republic of Albania, Law No. 124/2024 "On Personal Data Protection", Law No. 10128/2009 "On Electronic Commerce", Law No. 9902/2008 "On Consumer Protection", and the General Data Protection Regulation (GDPR).
3. **Fairness and Transparency:** We treat all stakeholders fairly and transparently, providing clear, accurate, and complete information about our services, practices, and policies.
4. **Respect for Rights:** We respect the fundamental rights of all individuals, including the right to personal data protection as enshrined in Article 35 of the Constitution of the Republic of Albania and Convention ETS No. 108.
5. **Accountability:** We take responsibility for our actions and decisions, maintaining comprehensive records and demonstrating compliance with all applicable legal and ethical standards.
6. **Environmental Responsibility:** As a renewable energy company specializing in Eolic, Solar, and Hydro energy projects, we are committed to sustainable practices that protect and preserve the environment.

3. CORPORATE GOVERNANCE AND ACCOUNTABILITY

3.1 Leadership Responsibility

The President and senior management of EU Green Energy LLC bear primary responsibility for ensuring ethical conduct throughout the organization. Leadership:

1. Has established and maintains a culture of ethical behavior and compliance.
2. Provides adequate resources for compliance programs and training.
3. Leads by example in adhering to all ethical standards and legal requirements.

4. Ensures effective communication of ethical expectations to all personnel.
5. Maintains oversight of compliance monitoring and enforcement activities.

3.2 Employee Responsibilities

All employees, contractors, and persons acting on behalf of the Company shall:

1. Read, understand, and comply with this Compliance Ethics document.
2. Act in accordance with all applicable laws, regulations, and Company policies.
3. Report any suspected violations of this document or applicable laws.
4. Participate in required compliance training programs.
5. Cooperate fully with any compliance investigations.

4. DATA PROTECTION AND PRIVACY COMPLIANCE

In accordance with Law No. 124/2024 "On Personal Data Protection", the GDPR, and Convention ETS No. 108, the Company commits to the following data protection ethics:

4.1 Fundamental Principles

1. **Lawfulness, Fairness, and Transparency:** Personal data shall only be processed lawfully, fairly, and in a transparent manner, ensuring data subjects are fully informed of processing activities.
2. **Purpose Limitation:** Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in any manner incompatible with those purposes.
3. **Data Minimization:** Only personal data that is adequate, relevant, and limited to what is necessary shall be collected and processed.
4. **Accuracy:** Personal data shall be accurate, and where necessary, kept up to date. Inaccurate data shall be rectified or erased without delay.
5. **Storage Limitation:** Personal data shall not be retained longer than necessary for the purposes for which it was collected.
6. **Integrity and Confidentiality:** Personal data shall be processed in a manner ensuring appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.
7. **Accountability:** The Technological Service Providers shall be responsible for and able to demonstrate compliance with all data protection principles.

4.2 Data Subject Rights

The Company shall respect and facilitate the exercise of all data subject rights as stipulated in Articles 14-20 of Law No. 124/2024, including the right of access, rectification, erasure, restriction, portability, objection, and rights related to automated decision-making. Requests shall be processed within 30 days in full compliance with applicable legislation.

4.3 Data Security

In accordance with Articles 22, 23, and 28 of Law No. 124/2024, the Company shall implement appropriate technical and organizational measures to ensure data security, including encryption, access controls, regular testing, and data protection by design and by default.

4.4 Breach Notification

In accordance with Article 29 of Law No. 124/2024, any personal data breach shall be notified to the Commissioner for the Right to Information and Personal Data Protection within 72 hours. Affected data subjects shall be notified directly if the breach poses a high risk to their rights and freedoms.

5. ENVIRONMENTAL AND SUSTAINABILITY ETHICS

As a company dedicated to renewable energy solutions, EU Green Energy LLC upholds the highest environmental ethical standards:

1. **Sustainable Development:** All Eolic, Solar, and Hydro energy projects shall be designed and implemented with sustainability as a core objective.
2. **Environmental Protection:** We commit to minimizing environmental impact and protecting natural ecosystems in all our operations.
3. **Compliance with Environmental Law:** We comply with all applicable environmental laws and regulations of the Republic of Albania and European Union environmental directives.
4. **Transparency in Environmental Reporting:** We provide accurate and transparent information about the environmental impact and benefits of our projects.
5. **Continuous Improvement:** We continuously seek to improve our environmental performance and adopt best practices in renewable energy development.

6. CONFLICT OF INTEREST POLICY

All personnel shall avoid situations where personal interests conflict or may appear to conflict with the interests of the Company:

1. **Disclosure:** All actual or potential conflicts of interest shall be disclosed promptly to management.
2. **Recusal:** Personnel shall recuse themselves from decisions where a conflict exists.
3. **Prohibition on Self-Dealing:** No personnel shall use their position for personal gain or to benefit family members or associates.
4. **Outside Activities:** Outside business activities that may interfere with duties or create conflicts must be approved in advance.

7. ANTI-CORRUPTION AND ANTI-BRIBERY

EU Green Energy LLC maintains a zero-tolerance policy towards corruption and bribery:

1. **Prohibition of Bribery:** No personnel shall offer, promise, give, request, or accept any bribe or improper payment.
2. **Gifts and Hospitality:** Gifts and hospitality must be reasonable, proportionate, and properly recorded.
3. **Third-Party Due Diligence:** Business partners, agents, and contractors shall be subject to appropriate due diligence to ensure compliance with anti-corruption standards.
4. **Record Keeping:** Accurate records shall be maintained of all transactions and dealings.
5. **Compliance with Law No. 9121/2003:** All activities shall comply with the Albanian Law "On Protection of Competition" ensuring fair competition practices.

8. CONSUMER PROTECTION AND FAIR DEALING

In accordance with Law No. 9902/2008 "On Consumer Protection" and EU Consumer Rights Directive 2011/83/EU, the Company commits to:

1. **Right to Information:** Providing clear, accurate, and complete information about services, prices, and terms before any agreement.
2. **Right of Withdrawal:** Honoring the 14-day right of withdrawal for online purchases where applicable.
3. **Right to Redress:** Providing appropriate remedies including repair, replacement, price reduction, or refund for defective goods or services.
4. **Fair Contract Terms:** Ensuring all contract terms are fair, transparent, and not detrimental to consumers.
5. **Prohibition of Unfair Practices:** Avoiding all misleading, deceptive, or aggressive commercial practices.

9. INTELLECTUAL PROPERTY COMPLIANCE

The Company is committed to respecting and protecting intellectual property rights:

1. **Protection of Company IP:** All Company intellectual property, including trademarks, logos, content, and proprietary information, shall be protected and properly used.
2. **Respect for Third-Party IP:** The intellectual property rights of third parties shall be respected, and no unauthorized use shall occur.
3. **Criminal Liability:** As stated in the Terms and Conditions, unlawful usage, distribution, or interference with intellectual property constitutes a serious breach and criminal offence, prosecutable under the criminal code and criminal procedural code.
4. **Confidentiality:** Confidential information shall be protected and not disclosed without proper authorization.

10. ELECTRONIC COMMUNICATIONS ETHICS

In accordance with Law No. 54/2024 "On Electronic Communications" and Law No. 124/2024, the Company adheres to the following standards:

1. **Consent-Based Marketing:** Marketing communications shall only be sent with explicit, informed, and freely given consent obtained through a clear opt-in mechanism.
2. **Easy Withdrawal:** Consent may be withdrawn at any time through a simple and free method, and such withdrawal shall be respected immediately.
3. **Cookie Compliance:** Non-essential cookies shall only be placed with user consent, and users shall be able to manage their cookie preferences at any time.
4. **E-Commerce Compliance:** All electronic commerce activities shall comply with Law No. 10128/2009 "On Electronic Commerce" and Directive 2000/31/EC.

11. BREACH REPORTING AND WHISTLEBLOWER PROTECTION

11.1 Reporting Mechanisms

All personnel have a duty to report any suspected violations of this Compliance Ethics document, applicable laws, or Company policies. Reports may be made through:

1. Direct communication with supervisors or management.
2. Written reports submitted to the Data Controller contact provided on the Website.

3. Complaints to the Commissioner for the Right to Information and Personal Data Protection for data protection matters.
4. Complaints to the Albanian Consumer Protection Commission for consumer matters.

11.2 Whistleblower Protection

The Company prohibits retaliation against any person who in good faith reports a suspected violation. Whistleblowers shall be protected from dismissal, demotion or any other form of adverse treatment.

12. TRAINING AND AWARENESS

To ensure effective compliance, the Company shall:

1. Provide regular training on this Compliance Ethics document and applicable legal requirements.
2. Ensure all personnel understand their responsibilities under data protection laws, including Law No. 124/2024 and the GDPR.
3. Update training materials to reflect changes in law and Company policies.

13. MONITORING AND REVIEW

The Company shall:

1. Regularly monitor compliance with this document and applicable laws.
2. Conduct periodic audits of data protection practices, security measures, and compliance procedures.
3. Review and update this Compliance Ethics document at least annually or when significant legal or operational changes occur.
4. Document all monitoring and review activities.

14. ENFORCEMENT AND DISCIPLINARY ACTION

Violations of this Compliance Ethics document may result in:

1. **Internal Disciplinary Action:** Including warnings, suspension, demotion, or termination of employment or contract.
2. **Civil Liability:** Including damages and compensation claims.
3. **Criminal Prosecution:** For violations constituting criminal offences under Albanian law, including intellectual property infringement as referenced in the Terms and Conditions.
4. **Regulatory Sanctions:** Including fines and penalties imposed by the Commissioner for the Right to Information and Personal Data Protection or other competent authorities.

15. AMENDMENTS AND UPDATES

The Company reserves the right to amend this Compliance Ethics document at any time. Changes shall be effective immediately upon publication. All personnel shall be notified of material changes and are responsible for reviewing updated versions. In the event of any conflict between this Compliance Ethics document and applicable Albanian law, European Union law, or Council of Europe conventions, the applicable law shall prevail.

ANNEX: LEGAL FRAMEWORK REFERENCES

This Compliance Ethics document is drafted in compliance with the following legal instruments as referenced in the Terms and Conditions and Privacy Policy:

Albanian National Legislation

1. Constitution of the Republic of Albania – Article 35;
2. Law No. 124/2024 "On Personal Data Protection" (Official Gazette No. 9, 17 January 2025);
3. Law No. 10128/2009 "On Electronic Commerce";
4. Law No. 9902/2008 "On Consumer Protection" (as amended);
5. Law No. 54/2024 "On Electronic Communications";
6. Law No. 9880/2008 "On Electronic Signatures";
7. Law No. 9121/2003 "On Protection of Competition" (as amended);
8. Commissioner Decision No. 6/2013 "On Security of Personal Data".

European Union Law

9. Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR);
10. Directive (EU) 2016/680;
11. Directive 2000/31/EC (E-Commerce Directive);
12. Directive 2011/83/EU (Consumer Rights Directive);
13. Directive (EU) 2019/2161.

Council of Europe Instruments

14. Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (ETS No. 108);
15. Convention on Access to Official Documents (CETS No. 205) – Tromsø Convention.

Acknowledgment: By accessing or using the Website and services of EU Green Energy LLC, all users, employees, contractors, and partners acknowledge that they have read, understood, and agree to comply with this Compliance Ethics document.

Effective Date: This Compliance Ethics document is effective as of the date indicated at the beginning of this document and forms an integral part of the Terms and Conditions and Privacy Policy for the usage of the Website.

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