	WHISTLEBLOWER PROTECTION POLICY	Code	GL 015
		Date:	January 22, 2026
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		Prepared by:	DIANA B

1. Purpose

Green Loop Sustainable Architecture & Engineering Ltda (hereinafter, “Green Loop” or “GL”) is committed to promoting a culture of integrity, transparency, and accountability, ensuring that any person may report, in good faith, misconduct, risks, or irregularities related to the company’s activities **without fear of retaliation**.

This policy aims to protect whistleblowers and to ensure a **confidential, fair, and impartial process** for the handling of reports.

2. Scope

This policy applies to:

- Green Loop employees and management
- Suppliers, contractors, and subcontractors
- Clients
- Other stakeholders directly or indirectly connected to the company

2. Reportable situations

The following situations may be reported, among others:

- Fraud, corruption, bribery, or conflicts of interest
- Legal, regulatory, or contractual non-compliance
- Conduct contrary to Green Loop’s Code of Ethics or core values
- Violations of human rights or labor rights
- Environmental damage or risks
- Risks or impacts associated with projects or clients in controversial or ineligible industries
- Any form of retaliation against whistleblowers

3. Reporting channels


Reports may be submitted through the following channels established by Green Loop:

- **Complaints and Grievance Form** available on the corporate website
- **Email:** info@green-loop.com

4. Non-retaliation principle

Green Loop expressly prohibits any form of retaliation against individuals who submit reports in good faith, including but not limited to:

- Unjustified dismissal or disciplinary action
- Threats, harassment, or discrimination
- Deterioration of working or contractual conditions

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This principle applies regardless of whether the report is ultimately substantiated, provided it was made in good faith.

6. Whistleblower protection measures

To protect whistleblowers, Green Loop commits to:

- Maintaining the **confidentiality** of the whistleblower's identity and the information provided
- Limiting access to information strictly to those necessary for the investigation
- Assessing the risk of retaliation on a case-by-case basis
- Adopting **immediate corrective measures** if any form of retaliation is identified

7. Management of reports

Reports received by Green Loop will be managed through a structured, confidential, and impartial process, which includes the following stages and indicative timelines:

a) Receipt and registration

All reports will be formally acknowledged and securely registered within five (5) business days of receipt.

b) Initial assessment

An initial review will be conducted to determine whether the report falls within the scope of this whistleblower and grievance mechanism.

This assessment will be completed within ten (10) business days of registration.

c) Investigation


If accepted, the report will be investigated in an objective and impartial manner, in accordance with due process and confidentiality requirements.

Investigations are expected to be completed within thirty (30) business days, depending on the complexity of the case.

d) Resolution and closure

Based on the findings of the investigation, Green Loop will determine appropriate corrective or remedial actions, where applicable.

The case will be formally closed once actions have been implemented or a final decision has been documented.

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Communication during the process

Where contact information has been provided, Green Loop will make reasonable efforts to keep the whistleblower informed of key stages of the process, including:

- Confirmation of receipt
- Acceptance or non-acceptance of the report
- Relevant progress updates
- Confirmation of resolution and closure

Non-acceptance of reports

If a report is determined not to fall within the scope of this mechanism, Green Loop will provide the reporting individual with a clear and reasoned explanation outlining why the matter was not accepted, subject to confidentiality and applicable legal requirements.

8. Consequences of retaliation

Any individual found to have engaged in retaliation against a whistleblower may be subject to one or more of the following measures, depending on the severity of the conduct:

- Verbal or written warnings
- Mandatory corrective action plans or training
- Temporary suspension of duties or responsibilities
- Termination of employment or contractual relationship
- Referral to competent authorities, where required by law

Disciplinary measures will be applied in a fair, proportional, and consistent manner, in accordance with applicable laws and internal procedures.

9. Responsible use of the mechanism

Green Loop expects this mechanism to be used responsibly. Reports submitted in bad faith or containing deliberately false information may result in corrective measures, without affecting the overall protection afforded by this policy.

10. Communication and availability

This policy:

- Will be communicated to Green Loop employees
- Will be made available on the corporate website
- Will be periodically reviewed to ensure its validity and alignment with the company's commitments