

CAPSTONE GREEN ENERGY HOLDINGS, INC. (“CAPSTONE”)
**POLICY FOR REPORTING ETHICS AND COMPLIANCE CONCERNS
AND REPORTING PROTECTIONS**

March 9, 2026

Background

This Policy applies to directors, officers and employees (“Representatives”) at all levels of Capstone and each domestic and foreign subsidiary, partnership or other business association that is effectively controlled by Capstone (together the “Company”).

The Company has several policies – including its Code of Business Conduct and Ethics – which define the high ethical standards and expectations for its Representatives; it is your responsibility and the responsibility of every Representative to behave honestly, with integrity, and in compliance with the letter and spirit of the law when conducting Company business. The Company is also committed to ensuring compliance with all applicable financial and accounting standards and controls, as well as audit practices.

You may find yourself in a situation that raises a question or concern, or where the choice is not clear. It is critical that you promptly raise any ethics or compliance questions or concerns that you might have so the Company can ensure that the conduct of its Representatives aligns with its expectations and, if a deviation is detected, it can undertake corrective action.

This policy provides information on how you can raise a question or a concern on a confidential and, if desired, anonymous basis. This policy is in no way intended to limit your right to report alleged violations to the appropriate governmental and regulatory authorities.

What Kinds of Questions or Concerns Should I Raise?

You should promptly elevate good faith questions or concerns that pertain to any ethics or compliance matters (“Report”), including any of the following:

- Financial fraud
- Accounting, financial reporting or auditing matters
- Internal controls
- Bribery, corruption, or kickbacks, including potential violations of the US Foreign Corrupt Practices Act
- Physical safety risks
- Threats to information technology security
- Insider trading
- Environmental, health or safety violations

- The unauthorized disclosure of confidential information or the theft of intellectual property
- Competition or antitrust law violations
- Misappropriation or misuse of Company assets
- Import/export law or sanctions violations
- Retaliation against any Representative for making a Report
- Any other violation of the law, the Company's Code of Business Conduct and Ethics or any Company Policy

How Do I Make a Report?

You can always make a Report to your immediate supervisor or any member of the Leadership Team.

Additionally, you can make a Report securely, safely and if desired anonymously - 24/7/365 - through an independent company called Red Flag Reporting. To do so, you should use the Company's client code (**Capstone**) and use one of the following options:

- Call: 1-877-647-3335 (Toll Free)
 - Live operators directly support English and Spanish, and can field calls in over 200 languages
- Click: www.RedFlagReporting.com
 - The web reporting portal supports over 50 languages
- Text: RFR to 234-231-9005
- E-mail: redflag@redflagreporting.com
- Fax: 330-572-8146
- Mail: RFR, P.O. Box 4230, Akron Ohio 44321

When a Report is made via phone call, webpage, text or e-mail, you will receive a private code that you can use to obtain updates on your Report, including the status of an investigation. Please note that if you fax or mail your question or report, Red Flag may be unable to assign you a private code or otherwise follow up with you.

What Happens Once I Make a Report?

Red Flag will promptly direct your Report to the Company's General Counsel and Head of Human Resources, both of whom have been given the authority to accept communications on behalf of the Company's Audit Committee of its Board of Directors ("Audit Committee") and to act as its agent. The General Counsel or Head of Human Resources, depending on the subject matter, will conduct an initial review of the Report to determine the most appropriate path.

If your Report raises a question that is easily answered, you will be contacted with the answer – or where you have submitted the Report anonymously, you can obtain the answer by contacting Red Flag and using your private code. All other Reports will be investigated, and certain Reports may be elevated to the Audit Committee in accordance with the established Company protocols.

Any investigation into a Report will be prompt and thorough, and subject to the oversight of the Audit Committee.

After concluding an investigation, the Company will decide whether a Report is substantiated or unsubstantiated, in whole or in part. The Company's response to substantiated facts will be determined on a case-by-case basis considering their seriousness and may include discipline for anyone found to have violated the Company's ethical standards and expectations, up to and including termination.

The General Counsel will make periodic reports to the Audit Committee regarding the receipt of Reports, the status of investigations and the ultimate resolution of every Report.

How Am I Protected If I Make a Report?

If you decide to make a Report without being anonymous, your identity will be kept strictly confidential and only disclosed to authorized people when necessary to answer your question, to investigate the Report, or as required by law.

You may always make a Report without fear of termination or other retaliation. The Company will not tolerate any adverse action (including termination, demotion, suspension, threats, harassment, discrimination in the terms and conditions of employment, or any action otherwise prohibited by Section 806 of the Sarbanes-Oxley Act of 2002) against any Representative for making a Report. Should you have a concern about retaliation, you should immediately raise it with the Company's General Counsel.