

Code of Conduct

The purpose of Eurowind Energy's Code of Conduct is to assist our employees in following good business conduct. We require our employees to conduct business with integrity and to respect people and the environment, following the guidelines stated in our Code of Conduct.

We believe in freedom with responsibility and trust that our employees know how to act appropriately. Overall, we expect our employees to keep our company's best interests in mind and act in accordance with our company values of reliability, loyalty, simplicity, and productivity. Our employees should have high moral and ethical standards and act with integrity. Our employees represent Eurowind Energy both during and outside of working hours and we ask them to act according to our values at all times.

Our Code of Conduct applies to all employees, including management, and members of the Board. Any employee that fails to adhere to it may face disciplinary actions or sanctions according to contract or law. The Code of Conduct has been approved by Eurowind Energy's CEO and Board of Directors.

The Code of Conduct is aligned with the UN Global Compact Principles, the OECD Guidelines for Multinational Enterprises, and the UN Convention Against Corruption. We are committed to complying with all applicable national and local laws, rules, and regulations. For further information on Eurowind Energy's approach to environmental, social and governance matters, please refer to our sustainability policy.

Respect for people and the environment

Environment and climate

We wish to contribute actively and decisively to a sustainable and low-carbon future. Our mission is to be a leading developer, buyer, and operator of renewable energy sources, consequently accelerating the green transition. We are loyal to our green and sustainable mindset inside and outside the workplace.

At Eurowind Energy, we consider our impact on the environment when making business decisions. We continuously look for ways to reduce the environmental impact of our business operations. We expect all our employees to behave environmentally conscious, for example by considering the environmental impact of their business decisions or choosing eco-friendly means of transportation where it is reasonable to do so.

Human and labour rights

Eurowind Energy supports and respects all internationally recognised human rights, including the Universal Declaration of Human Rights, and internationally recognised labour rights as specified in the International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work.

Eurowind Energy is committed to maintaining a work environment with fair terms of employment, proper working conditions, zero discrimination and due consideration of work-

life balance. We do not use or tolerate any form of forced labour, modern slavery, human trafficking, or child labour. We respect our employees' right to be represented by a trade union.

Health and safety

At Eurowind Energy, we are committed to providing and maintaining a healthy and safe working environment. We conduct workplace assessments to evaluate the health and safety conditions in our workplace. All employees are responsible for maintaining a safe place of work and they are encouraged to speak up if they see unsafe behaviour. Any work-related injury must be reported to HR or as applicable under local regulation.

Our employees are expected to comply with the applicable working environment legislation for their workplace and to wear proper clothing and equipment. Access to operating sites may only take place in accordance with national regulations and guidelines from relevant organisations, such as the Global Wind Organisation. Persons on site must always inform themselves about the location of first aid equipment and how to call local emergency services. On sites managed by Eurowind Energy, updated stickers with emergency information must always be clearly visible at the entrance.

It is not permitted to consume or be under the influence of alcohol during working hours. However, it is permitted to consume alcohol on special occasions. Smoking is prohibited indoors and in company cars. Eurowind Energy is a drug-free workplace. At all times, it is prohibited to consume alcohol or be under the influence of any substance on operating equipment or when responsible for the safety of others.

Equal opportunities

At Eurowind Energy, we believe that everybody should be recognized and respected for who they are. We are determined to provide equal treatment and opportunities to all employees, irrespective of their individual characteristics, such as gender, nationality, or religious beliefs.

We promote equality, tolerance, and mutual respect. It is paramount for us to create and maintain a culture where everyone is valued and feels they belong. Our employees are obliged to contribute to a supportive, constructive, and open-minded working environment. This implies being mindful of how one's language and behaviour may be perceived by others, refraining from making inappropriate comments, and being respectful of cultural differences.

We are committed to creating and maintaining an inclusive environment free of bullying, harassment, and discrimination. Any form of harassment such as aggressive behaviour or the use of offensive language will not be tolerated. Allegations, whether against fellow employees or third parties working directly with Eurowind Energy, will be treated on a case-by-case basis.

Personal data protection

At Eurowind Energy, we process personal information. Our employees are tasked with taking good care of all personal information and following the General Data Protection Regulation

(GDPR) or the applicable data protection and privacy law in countries outside of the EU. We have implemented various initiatives, including GDPR workshops, to guide our employees in properly handling personal data. For further information, please refer to our local data protection policy.

Stakeholder relationships

Business partners and suppliers

Eurowind Energy values being a reliable, loyal, and productive partner in business. We seek to work with business partners and suppliers who share our values, our respect for people and the environment, and our commitment to business integrity. We expect business partners and suppliers to operate in line with internationally recognised human rights and not engage in any form of corrupt practices. Our business partners and suppliers should follow policies or codes similar to our own, with a focus on human and labour rights, environmental protection, and business ethics.

Community engagement

We play an active part in most communities in which we operate. We create an inclusive dialogue surrounding our projects and have a voice in the discussion about the green transition of the energy system. In doing so, we try to involve local communities and stakeholders as early as possible in the process, welcome their input, and address their concerns. Our projects are developed together with local competencies, enabling us to create the optimal solution for each local community as well as economic, social, and environmental benefits.

Business integrity

Anti-corruption and anti-bribery

We do not tolerate the bribery of, or by, any business partner, government agency or public authority and we maintain honest and fair relationships with government agencies and public authorities. Likewise, we take a zero-tolerance approach to corruption and facilitation payments. We also maintain fair and free competition in accordance with the letter and spirit of each country's competition laws.

Gifts and hospitality should only be accepted if they are appropriate, reasonable, legal, and infrequent. If in doubt about the appropriateness of a gift, employees should always contact their manager. It is important that gifts, etc. do not affect the employee's professional objectivity towards the giver. Gifts should be given out of courtesy and never to inappropriately influence a decision.

Financial and non-financial reporting

At Eurowind Energy, we are committed to maintaining accurate records and detecting and preventing fraud. Employees should keep honest, accurate, and complete records and disclose accurate, full, fair, timely and clear information to the government, regulatory authorities, and auditors.

Conflicts of interest

Our employees are expected to avoid conflicts of interest, by disclosing any potential conflicts of interest to their manager as early as possible, removing themselves from the decision-making process, and documenting how the conflict of interest was managed.

Confidential information

Our employees have a duty of confidentiality about the information they obtain at work. The confidentiality of information applies to Eurowind Energy's own business, business partners' business and investors' financial situation and continues to apply after the termination of the employment relationship.

Intellectual property rights

Our employees are responsible for protecting Eurowind Energy's intellectual property rights. This means managing our intellectual property safely as well as preventing unauthorized use and disclosure. We equally respect the intellectual property of others.

Company assets and resources

Our employees have a responsibility to take proper care of Eurowind Energy's company assets and resources, including keeping them safe from damage, waste, loss, theft, and improper use. Corporate assets should only be used for their intended business purpose and with the company's best interests in mind.

The IT equipment of the company, such as e-mail, internet access and portable equipment, is primarily for the use of the operation of the company. All IT equipment that is connected to the company server/data, including e-mail, must be secured with a password. It is the duty of all employees to maintain a high level of security concerning the use of the company's assets and to protect access to confidential information.