



Code of Conduct for Business Partners of Midtfjellet Vindkraft AS

1. The Code of Conduct for Business Partners of Midtfjellet Vindkraft AS

The Code of Conduct (the Code) for Business Partners, reflects the commitment of Business Partners to the principles and values of Midtfjellet Vindkraft AS (MVAS).

In the context of this Code, any legal entity or natural person presently or in the future involved in any business activities with the MVAS is referred to as a “**Business Partner(s)**”. These may include, but are not limited to, the following: sub-contractors, sub-suppliers, suppliers and advisors.

Acceptance of and compliance with the terms and conditions, established in this Code, represents a key criterion when evaluating, selecting and engaging with Business Partners, both at the initial establishment of the relationship and across its lifecycle.

The Code reflects the MVAS’s ambitions to advance social and environmental responsibility and therefore may require Business Partners to go beyond compliance with locally applicable laws and regulations.

Business Partners shall comply with the applicable laws and regulations, regarding their country of origin as well as the countries in which they operate. Additionally, Business Partners are expected to act in accordance with relevant international conventions and guidelines established by international organisations such as the International Labour Organization (ILO), the Organization for Economic Cooperation and Development (OECD) and the United Nations (UN).

2. Human rights and labour practices

Human rights: Business Partners are expected to conduct human rights due diligence in line with the United Nations Guiding Principles on Business and Human Rights.

Forced labour and child labour: Business Partners are expected to diligently avoid the use of all forms of forced or compulsory labour and child labour.

Labour conditions: Regarding the remuneration, Business Partners shall provide its employees with adequate wages which conform with the respective national legal minimum standards.

Freedom of association and collective bargaining: Business Partners shall recognise the right of free association or joining employee councils without interference in line with the ILO Conventions C87 and C98. Where a significant proportion of the workforce agrees, collective bargaining in good faith or existing bargaining agreements shall be respected by Business Partners. In case Business Partners are operating in countries where applicable law restricts the right of freedom of association and collective bargaining, they shall support alternative permitted means of association for employees.

Non-discrimination: Business Partners shall refrain from any form of discrimination regarding hiring, compensation, access to training, promotion, termination, or retirement based on ethnic background, national origin, religion, age, disability, gender, marital status, political affiliation, union membership, or regional or tribal origin, per ILO Conventions C100, C111, and C181.

Hazardous materials: Business Partners must ensure that hazardous substances and chemicals are safely procured, stored, used, and disposed in order to protect employees and the environment.

Accordingly, employees must be instructed regularly. Where possible, hazardous substances should be replaced by less hazardous substances. This needs to be reviewed and assured by Business Partners continuously.

When handling substances (e.g., products and materials) that are classified as hazardous to the environment, Business Partners must ensure that they are handled, transported, stored, recycled, and/or disposed of safely.

3. Environmental commitment of Business Partners

Business Partners are obliged to comply with all laws, regulations, and standards for the protection of natural resources and the environment.

Business Partners shall record use and discharge of natural resources, including emissions to air, discharges to water, water usage, assessment and management of spills and leakage, hazardous and non-hazardous waste management, and biodiversity, in order to measure the environmental impact appropriately.

4. Business integrity and compliance

Anti-corruption: Business Partners are prohibited to engage in, facilitate or tolerate any form of fraud. Fraud is understood to encompass corruption, asset misappropriation and financial statement fraud.

Business courtesies, gifts, hospitality, and expenses: The offer or acceptance of business courtesies, gifts, hospitality, expenses, or any benefit which could establish, or could be perceived as aimed at establishing, an unjustified influence shall be prohibited for Business Partners. When business courtesies involve public officials, either as providers or as recipients, a high level of caution is required to protect against actual and potential attempts of corrupt business practices, as well as against the outward appearance of the same.

Sourcing from conflict-affected and high-risk areas: Business Partners shall not contribute to Human Rights abuses in High-Risk Areas in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the United Nations Global Compact Guidance on Responsible Business in Conflict-Affected and High-Risk Areas and Guidance on Due diligence for EU businesses to address the risks of forced labour in their operations and supply chains. Therefore, Business Partners shall commit to policies and procedures to avoid direct or indirect contribution to Human Rights abuses and environmental adverse impacts. Respective employees, such as purchasing teams, should be trained in corresponding due diligence procedures.

Sanctions: Business partners are expected to abstain from and diligently guard against establishing and maintaining business relationships with restricted parties. In addition, Business Partners are expected to abstain from cooperating directly or indirectly with sanctioned countries. To ensure that this posture is complied with, due diligence measures may be used during the Business Partner selection process.

Preventing money laundering and financing of terrorism: It is prohibited for Business Partners to facilitate or participate in, directly or indirectly, any form of money laundering. Business Partners are expected to comply with their respective anti-money laundering and countering the financing of

terrorism obligations and actively contribute to preventing financial crime compliance-relevant transactions.

Confidentiality and data privacy: Any Information obtained in the course of the business relationship between MVAS and the Business Partners shall be kept confidential and is not to be misused.

Subcontracting: Business Partners agree to apply this Code when subcontracting services to fulfil the contractual relation with MVAS and to bear all liability for non-compliance of a subcontractor.

Concluding remarks

Business Partners shall therefore:

- abide by all applicable national and international trade laws and regulations, including, but not limited to, antitrust, trade controls, and sanction regimes.
- consider business integrity as the basis of business relationships.
- prohibit all types of financial crimes, including, but not necessarily limited to, fraud, money laundering, terrorism financing and sanctions evasion.
- prohibit gifts to private individuals or public officials that aim to influence business decisions or otherwise encourage them to act contrary to or in breach of their obligations.
- respect the privacy and confidential information of all employees and business partners as well as protect data and intellectual property from misuse.
- implement an appropriate compliance management system which effectively and efficiently facilitates compliance with all applicable laws, regulations, and standards.

5. Health and safety commitments for Business Partners

Business Partners shall adhere to the ILO Conventions on Occupational Health and Safety. Business Partners shall work actively for an injury-free and healthy working environment and to promote an open and proactive health and safety culture. Business Partners shall ensure the protection of their employees, avoiding their overexposure to chemical, biological or physical hazards or tasks demanding excessive physical effort at the workplace.

6. Control and supervision

Audit: Business Partners expressly authorise Midtfjellet Vindkraft AS, or any other organisation acting on its behalf, to conduct audits to verify proper compliance with the contents of this Code. Hence, Business Partners shall provide the necessary documents and allow access to their facilities to conduct the review.

Breaches: Business Partners shall have internal mechanisms to report and handle concerns, including breaches of the principles stipulated in this document. MVAS should be informed about any concerns and potential breaches without any delay and be provided with full cooperation regarding the subsequent investigation.

Both employees and business partners are encouraged to ask questions, seek guidance, raise concerns and report suspected violations. Midtfjellet Vindkraft has therefore established a whistleblowing system where information about any type of misconduct in a work-related context can-and-should-be reported under the protection of anonymity. The Whistleblowing system is available to our employees as well as third parties worldwide, at any time.

Notifications can be sent anonymously through MVAS's whistleblowing e-mail at varsling@midtfjellet.no. In line with Aquila Group's organisational culture of transparency and trust, all whistleblowing inquiries will be forwarded to Aquila Capital's whistleblowing portal, operated by BDO (<https://portal.bdolegal-whistleblower.de/>).

Consequences of infringement: MVAS reserves the right to verify compliance with these requirements using appropriate means. This verification may take the form of questionnaires or involve the deployment of experts on-site. An on-site audit of this nature is only carried out following prior notification and in the presence of representatives of the Business Partners during regular working hours and in accordance with applicable laws, in particular regarding data protection. Any identified non-compliance needs to be remedied within a reasonable period at no additional cost to MVAS.

Acceptance: Business Partners expressly accept the rules of this Conduct established in this document that are applicable thereto and confirm their acceptance and the commitment with the provisions established therein. Additionally, Business Partners are responsible for transmitting the content of this Code to their staff and their subcontractors, as well as those who are in some way involved in the manufacturing and/or maintenance process.

If the expectations of this Code are not met, the business relationship may be reviewed and/or terminated, and corrective action taken in accordance with the respective contractual terms and conditions.

Company name: Midtfjellet Vindkraft AS

Signature name: Erik Mortensen

Date and place: Fitjar, 28 June 2023

Signature:

