

# Code of conduct

## Øyfjellet Wind

- **Why Code of Conduct**

The purpose of this Code of Conduct is to describe and define Øyfjellet Wind AS's approach to Environmental, Social and Governance topics (ESG). This document forms the basis for how we act and behave, and provides general guidelines for relevant matters.

- **Our purpose**

Øyfjellet Wind AS has the license of and is operating Øyfjellet Wind Park. Øyfjellet Wind Park started as a local initiative, with broad support from the local population, industry and decision-makers. The wind park is a long-term contributor to renewable energy, employment, growth and development, benefitting the region for years to come. The aim of Øyfjellet Wind AS is to produce renewable energy for local industry based on a long-term power purchase agreement.

Øyfjellet Wind AS is owned by long-term investment funds managed by Aquila Capital. The investors are mainly European and US investors and pension funds with an environmental profile.

## To whom does the Code of Conduct apply

The Code of Conduct applies to the board, management, employees, temporary personnel and others who act on behalf of Øyfjellet Wind. In addition, we expect our consultants, advisors, suppliers and business partners to act in a way that meets our ethical standards and is in line with this Code of Conduct.

## Environment

Øyfjellet Wind strives to mitigate climate change through renewable energy production. We support the development of a low-carbon society and contribute to the transition to a sustainable society by operating the wind power plant on Øyfjellet.

Øyfjellet Wind always complies with Norwegian laws and monitors relevant environmental issues and regulations in order to adjust our operations and actions accordingly.

Øyfjellet Wind strives to limit the negative environmental impact caused by our operations.

## HSEQ

Øyfjellet Wind is committed to facilitating a safe environment for our employees, contractors and visitors. Øyfjellet Wind follows all Norwegian laws and regulations

and is concerned with safeguarding the physical, mental and social health of our employees and contractors.

To support the company in providing the best work conditions, each of us is responsible for protecting ourselves, our colleagues and the third parties working at our locations from any potential health damages.

We are also responsible for protecting the local population and others who visit the wind power plant.

### **Local community and stakeholders**

It is essential for us to have a close and open dialogue with local stakeholders and everyone who is affected by our operations.

In our operations, we strive to adapt to and accommodate the needs and interests of local stakeholders, such as the municipality, land owners, and the local reindeer herding district.

### **Anti-Corruption**

Øyfjellet Wind has zero tolerance for corruption. Our employees shall not, under any circumstances, offer or accept money, gifts, services, or other things of value that are intended to influence a business decision. Øyfjellet Wind complies with Norwegian anti-corruption laws and guidelines.

### **Human Rights**

We respect, protect and promote all the regulations in force regarding the protection of human rights as a fundamental, general requirement. This applies not only to cooperation within our company, but also to the behaviour of our business partners.

### **Labour Rights**

We operate in line with the Norwegian Working Environment Act regulating the working environment, working hours and employment protection. In the supply chain, we expect all suppliers to reject any use of child labour and forced or mandatory labour, as well as modern slavery.

Work practices and conditions that are in breach of fundamental human rights are forbidden.

## **Supply-chain and the Norwegian Transparency Act**

From 1 July 2022, the new Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act) came into force. The purpose is to “promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.”

Øyfjellet Wind is covered by this act. Therefore, we are obliged to carry out due diligence assessments and define areas in our operations that involve a risk of violations of fundamental human rights and decent working conditions. We have therefore started work on carrying out due diligence assessments and defining areas in our business that involve a risk of violations of fundamental human rights and decent working conditions. These due diligence assessments will be included in an annual report that we will publish so the public can have access to this information. According to the legislation, the first report must be published on 30 June 2023, but the work on mapping and assessing risks is already ongoing.

Since Øyfjellet Wind only operates the wind farm at Øyfjellet and does not have its own production of components, our most significant risk factors are related to the supply chain. We must therefore work actively to ensure that we have proper routines for detecting and managing risks in our supply chain and among the goods and services we buy from others.