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# Code of Conduct Øyfjellet Wind AS



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Øyfjellet Wind AS (ØWAS) operates 72 wind turbines in Vefsn municipality in Nordland.

This Code of Conduct (Code) for ØWAS establishes the company's commitments to specific principles and values. The guidelines encompass both social and environmental aspects.

These guidelines apply to all employees, including temporary staff. This means that everyone working for or on behalf of ØWAS is obligated to act in accordance with these guidelines. In addition to the values and expectations outlined in this document, ØWAS adheres to international standards from organizations such as the International Labour Organization (ILO), the Organisation for Economic Co-operation and Development (OECD), and the United Nations (UN).

### Our Business Practises

**Human Rights:** ØWAS conducts due diligence assessments related to human rights and decent working conditions in line with the UN Guiding Principles on Business and Human Rights and the requirements of the Norwegian Transparency Act.

**Forced Labour and Child Labour:** ØWAS refrains from using any forms of forced labour or child labour. ØWAS is committed to ensuring that there is no modern slavery in our supply chains or any part of our business. Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain.

**Working Conditions:** ØWAS guarantees that the company has a wage policy that provides a satisfactory standard of living for all employees. In recruitment, ØWAS emphasises qualifications, experience, and competence, and the principle of equal pay for equal work applies.

**Freedom of Association and Collective Bargaining:** The right to freely organise in trade unions shall be upheld, and union representatives shall not be discriminated against or hindered in their work. Workers shall have the right to join or establish trade unions of their choice and to engage in collective bargaining.

**Prohibition of Discrimination:** ØWAS shall refrain from any form of discrimination in hiring, pay, access to training, promotion, dismissal, or retirement based on ethnic background, national origin, religion, age, disability, gender, marital status, political affiliation, union membership, or regional origin, in accordance with ILO Conventions C100, C111, and C181.

**Health, Environment, and Safety:** A safe and health-promoting work environment shall be ensured, including training in health and safety for all employees. Workers shall have access to clean sanitary facilities and safe drinking water. Necessary measures shall be taken to prevent and reduce the risk of accidents and health issues arising from working conditions. Measures to mitigate negative effects on health and the environment shall be implemented in accordance with national and international environmental legislation.

**Anti-Corruption:** ØWAS has a zero-tolerance policy for any form of corruption. Employees must not allow decisions or actions to be influenced by undue pressure or offers of financial benefits from parties with vested interests. When gifts involve public officials, whether as givers or receivers, a higher degree of caution is required to protect against actual and potential attempts at corrupt business practices and the appearance of the same.



**Procurement from Conflict Areas and High-Risk Areas:** ØWAS shall not contribute to human rights violations in high-risk areas in line with the OECD guidelines for responsible sourcing of minerals from conflict-affected and high-risk areas. ØWAS will not engage in activities that directly or indirectly contribute to human rights violations and negative environmental consequences.

**Sanctions:** ØWAS will refrain from establishing or maintaining business relationships with sanctioned parties. Additionally, ØWAS will avoid cooperation with sanctioned countries.

**Prevention of Money Laundering and Terrorist Financing:** ØWAS is committed to complying with all laws against money laundering and terrorist financing.

**Confidentiality and Privacy:** ØWAS is committed to protecting personal data about our employees and business partners, as well as others we come into contact with.

**Community engagement:** ØWAS will promote the employment and contracting of local services. Social sustainability is important for ØWAS, and the choice to support local businesses is part of this work.

## **Our environmental practises**

ØWAS is obliged to comply with all relevant laws, regulations, and standards for the protection of natural resources and the environment. This specifically includes laws, regulations and standards relating to greenhouse gas emissions, energy usage, water usage, waste management, biodiversity and the use and discharge of natural resources more in general.

## **Violations**

All employees have access to internal channels to report and address concerns, including violations of the principles set forth in this document. ØWAS should be informed of all concerns and potential violations so that necessary investigations can be initiated.

ØWAS will never take retaliatory action against individuals or groups who raise or contribute to addressing a genuine concern related to business integrity or sustainability. Both employees and business partners are encouraged to ask questions, seek guidance, raise concerns, and report suspected violations.

Therefore, ØWAS has established a whistleblowing system where information about any irregularity in a work-related context can – and should – be reported under the protection of anonymity. The whistleblowing system is available to both our employees and third parties worldwide, at any time.

## **Whistleblowing**

Reports can be submitted anonymously via ØWAS's whistleblowing email: [varsling@oyfjelletwind.no](mailto:varsling@oyfjelletwind.no). In line with the Aquila Group's organizational culture of openness and trust, all reports will be forwarded to Aquila Capital's whistleblowing portal, managed by BDO (<https://portal.bdolegal-whistleblower.de/>).

## **Acceptance**

Employees accept the ethical guidelines set forth in this document and confirm their acceptance and commitment to them. If the expectations in the guidelines are not met, employment terms may be reconsidered and/or terminated, and corrective actions may be implemented according to applicable contractual terms.

**Code of Conduct for Øyfjellet Wind AS, first published June 2023. Last revision: December 2024.**

**Company:** Øyfjellet Wind AS

**Signature Name:** Erik Mortensen

**Date and Place:** Mosjøen, December 2024

**Signature:**

