



Code of Conduct for Midtfjellet Vindkraft AS

1. The Code of Conduct of Midtfjellet Vindkraft AS

The Code of Conduct (the Code) reflects the commitments of Midtfjellet Vindkraft AS (MVAS) to selected principles and values, the ambitions to advance social and environmental responsibility and therefore may require MVAS to go beyond compliance with locally applicable laws and regulations.

This Code of Conduct applies to all employees (including temporary personnel). The company and everyone who is currently or in the future employed or acts on behalf of MVAS shall comply with the applicable laws and regulations. MVAS will always 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: MVAS will conduct human rights due diligence in line with the United Nations Guiding Principles on Business and Human Rights.

Forced labour and child labour: MVAS refrains from the use of all forms of forced or compulsory labour and child labour.

Labour conditions: MVAS guarantees that the company provides its employees with adequate wages that conform with the national legal minimum standards.

Freedom of association and collective bargaining: MVAS recognises the right of free association or joining employee councils without interfering with ILO Conventions C87 and C98. Where a significant proportion of the workforce agrees, collective bargaining in good faith or existing bargaining agreements will always be respected by MVAS.

Non-discrimination: MVAS 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: MVAS 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.

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

3. Environmental Commitment

MVAS is obliged to comply with all laws, regulations, and standards for the protection of natural resources and the environment.

MVAS shall record the 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 to measure the environmental impact appropriately.

4. Business integrity and compliance

Anti-corruption: MVAS will not 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 is highly prohibited. When business courtesies involve public officials, either as providers or recipients, a high level of caution is required to protect against actual and potential attempts of corrupt business practices and against the outward appearance of the same.

Sourcing from conflict-affected and high-risk areas: MVAS will not contribute to human rights abuses in high-risk areas in line with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected, High-Risk Areas and 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, MVAS will not be involved in activities that directly or indirectly contribute to human rights abuses and environmental adverse impacts. Respective employees, such as purchasing teams, should be trained in corresponding due diligence procedures.

Sanctions: MVAS will abstain from and diligently guard against establishing and maintaining business relationships with restricted parties. In addition, MVAS abstain from cooperating directly or indirectly with sanctioned countries. Due diligence measures will be used during the supplier selection process to ensure that this posture is complied with.

Preventing money laundering and financing of terrorism: MVAS is committed to complying with all anti-money laundering and anti-terrorism laws. We will conduct business only with reputable customers and business partners involved in legitimate business activities, with funds derived from legitimate resources.

Confidentiality and data privacy: MVAS is committed to protecting the personal data of our personnel and business partners, and those we come in contact with.

5. Health and safety commitments

MVAS is committed to adhering to the ILO Conventions on Occupational Health and Safety. MVAS shall work actively for an injury-free and healthy working environment and to promote an open and proactive health and safety culture. MVAS ensures the protection of our employees, avoiding their

overexposure to chemical, biological or physical hazards or to tasks demanding excessive physical effort at the workplace.

Breaches:

All employees 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.

MVAS will never pursue retaliatory measures against individuals or groups raising or helping to address a genuine business integrity or sustainability concern.

MVAS is committed to building a culture of trust where employees are comfortable asking questions, seeking guidance, raising concerns and reporting suspected violations.

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/>).

Acceptance: Employees expressly accept the rules of this Conduct established in this document that are applicable thereto and confirm their acceptance and commitment to the provisions established therein.

If the expectations of this Code are not met, the conditions of employment 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:

