



Code of Conduct

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Status: 02.10.2023, Version 0.2 | compliance@abo-wind.de

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Preamble

We are pioneers of renewable energy. Securing a future worth living in for future generations is our overarching goal. Since the foundation of ABO Wind in 1996, not only our mission and economic success have been at the centre of our daily actions, but also friendly and respectful interaction within the company, with business partners, open dialogue with stakeholders, responsibility for the environment, and compliance with legal and ethical standards.

Together with the General Management and the employees, the Managing Directors have defined the company's core values in this Code of Conduct and summarised the legal regulations and the company's requirements for ethical business practices.

This Code of Conduct is an expression of our corporate culture and shows which fundamental standards of behaviour determine our entrepreneurial actions to achieve our goals. These principles of conduct are our ethical and value-based foundation and express what our company stands for today and in the future. They apply to all ABO Wind employees worldwide.

For internal use, other work instructions and policies guide our employees in their daily work with respect to specific topics:

- Company Guideline
- Environmental guidance
- Supplier Code of Conduct
- Data Protection Guideline
- Export Control Policy
- Customs Directive
- Travel Guideline

The Code of Conduct summarises the most important rules and principles in one document. It is intended to demonstrate the basic principles of our cooperation and mutual respect in a transparent and concise manner for all employees as well as for all our business partners and the public. This Code of Conduct applies equally to all employees on all levels including top management. It serves as a guideline for dealing externally with business partners and the public, and internally for interacting with colleagues.

1. Laws and Ethical Standards

We conduct our business with integrity and comply with all national and international laws. We recognize that laws and ethical standards may vary from country to country, depending on national circumstances.

In conducting our business, we reject all forms of child labour. In choosing our business partners, we abide by all rules of the law as set forth in Section 32 of the UN Convention on the Rights of the Child (CRC).

As a company, we also bear responsibility for the respect of human rights in accordance with the UN Human Rights Charter, i.e., we ensure compliance with human rights in our daily activities and do not tolerate any violations, neither by our employees nor by our business partners.

Our employees are required to comply with national and international law and to act accordingly. We also expect our employees to live up to their personal responsibility and refrain from any activity that could harm the reputation of ABO Wind.

2. Business Integrity

Openness and mutual respect in our dealings with employees, suppliers, and business partners characterise our interactions. We treat all partners, investors, other organisations and institutions in a fair, cordial, and respectful manner. Transparency and honesty are the guiding principles of our communication and actions.

We require our employees to maintain high ethical standards in dealing with conflicts of interest. They are required to disclose to their superiors any relationship with persons or companies with

whom ABO Wind does business or personal activities that could lead to a conflict of interest. Such relationships include blood relationship or marriage, partnership, business partnership or investment.

3. Diversity and Mutual Respect

ABO Wind brings together people with different cultural backgrounds, skills, and perspectives. The diversity of our employees and the good relationships with our partners, suppliers and other organisations are fundamental to our success. We consider the diversity of our employees to be a real strength and asset.

We do not discriminate or tolerate any discrimination regarding gender, ethnic origin, religion, age, disability, sexual orientation, national origin, or any other characteristic protected by law. We do not tolerate any kind of violence in the workplace, including threatening or intimidating behaviour.

Our employees are committed to contributing to an environment of respect that excludes any form of harassment, intolerance, or discrimination. We expect all our employees to treat each other with respect.

4. Data Protection

ABO Wind employees may not use internal information for personal gain or for the benefit of another person. They are obliged to keep it strictly confidential and to ensure that it is not accessible to third parties.

Third parties are family members, friends, acquaintances as well as other market participants and the public. Within ABO Wind, information is only passed on to those who need it to fulfil their professional duties.

Any internal communication as well as any documents or business records that are not related to the specific work of an employee, as well as materials and documents that are the property of others, may not be copied, modified, deleted, or forwarded under any circumstances. These documents include technical data, financial data, file notes, reports and other business and operational information, as well as information on plans of the company.

The collection, processing and use of personal data must comply with applicable laws.

Compliance with measures to ensure the security of information is considered particularly important and any use of personal data must be transparent to those affected.

All employees are required to ensure that business and financial records are accurate, truthful, and complete.

This applies not only to bookkeeping, but also to other records and to the legal requirements for record keeping.

5. Gifts and Benefits

Corruption damages not only the company, but also the reputation of its workforce. Corruption is not a minor offense, but an illegal activity. Therefore, we deal transparently with all our suppliers, partners, and government agencies and in compliance with international anti-corruption standards and bribery laws, for example those in the United Nations Global Compact.

Gifts and other benefits are permissible if they are in line with standard business practice and are ethically acceptable. The granting and acceptance of gifts and other benefits is prohibited in particular if they create the appearance of influencing pending business decisions, regulations or guidelines.

Gifts include both material items and benefits, such as the promise of discounts, invitations, or free trips. It is irrelevant whether these benefits are granted to a business partner directly or to his family members or acquaintances. The customary scope of such gifts is exceeded if – viewed objectively – they compromise the ability to make an unbiased decision. Any form of benefit that could impair the objective decision-making ability of the recipient or damage the reputation of the company are not allowed.

6. Legal Procedures

Employees must avoid any activity that could involve ABO Wind in unlawful practices, including the unofficial employment of personnel or the use of company assets to make illegal profits.

Legal disputes, lawsuits and investigations involving ABO Wind must be reported promptly and handled properly to protect and defend the company. Employees who are threatened by an initiated legal proceeding or investigations into a business-related matter are required to inform their supervisors immediately.

This Code of Conduct is valid for the entire ABO Wind Group; its implementation in the country companies is the responsibility of the respective country managers.

Local national codes may contain additional, specific regulations in accordance with local laws, customs, and business practices. In no case, however, shall any clause conflict with the ABO Wind Code of Conduct.

7. Communication and Compliance with the Code of Conduct

We familiarise our employees with the contents of the Code of Conduct through regular training. The rules and principles anchored in the Code of Conduct are binding for the company's employees as part of their employment contract and must be complied with at all times. ABO Wind is committed to implementing the core values and requirements of the Code of Conduct through guidelines and processes in all areas. All employees are required to contact the Compliance Manager or their superiors in confidence in the event of violations and/or to report the corresponding information via the complaints management (will be published shortly). A report via the complaints management is possible anonymously or by name.

Communication with business partners takes place through direct contact on the part of the employees or the compliance officer.

8. Consequences of Violations of the Code of Conduct

A violation of the Code of Conduct and of legal provisions may, depending on its severity, result in consequences under labour law and liability law, and may also result in criminal sanctions.

9. Closing Provision

This Code of Conduct is not exhaustive. If there are any uncertainties or if guidance is needed in everyday work, the Compliance and Human Resources departments or the respective line managers will be happy to help.

Signed on behalf of the Managing Board



Dr. Jochen Ahn