



# COD OF CONDUCT- WIND SWEDEN

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Applies from time to time

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# 1 INTRODUCTION

This Code of Conduct summarizes the common rules of conduct and values that everyone within Wind Sweden AB should work with to create trust and good relationships with colleagues, customers, business partners and the world around us. Wind Sweden AB strives for the highest level when it comes to ethical conduct and the rules in this Code of Conduct shall guide in all situations that affect our work and our business. We expect everyone, regardless of position, to behave and represent the company in the best possible way in terms of professionalism, business judgement and trust in the environment and to adhere to the high ethical standards of their professional practice.

It is also important that our employees thrive and that we have a good working climate. All interaction between employees, whether it is leaders or equal colleagues, should also be done with respect, responsibility, and consideration towards each other, which creates Wind Sweden AB's success.

## 1.1 Company description

Wind Sweden is the small consulting company with the big vision of making the future renewable. Through broad industry knowledge and specialist expertise, our mission will offer market players proactive and strategic advice with qualified services in the development, realization, investment, and operation of renewable energy in the Nordic region.

### 1.1.1 Our Core Values

- Professional • Flexible • Engaged • Smart

# 2 LAWS, REGULATIONS AND RULES

All employees and business partners must comply with relevant laws, norms and regulations in the industry areas and countries in which we operate. This applies to our own production, how we treat our employees and how we manage our bookkeeping, accounting, and taxes.

# 3 HUMAN RIGHTS

Wind Sweden AB supports and respects the United Nations Declaration of Human Rights and accepts our responsibility to uphold the rights of employees and society in our operations. We are active in international collaborations with the aim of improving the conditions for those who work with manufacturing our goods. Wind Sweden AB will not trade with any country, company or individual against whom the UN or the European Union has issued sanctions. We will regularly monitor all published information from these sources to be sure that we are acting in accordance with them.

## 3.1 Child labour

Wind Sweden AB does not accept either forced or child labour and supports the UN Convention on the Rights of the Child (CRC). We will ensure that the products we sell do not come from companies that use child workers.

## 3.2 Trade unions

Wind Sweden AB respects the employees' right to form and join the unions they wish and to bargain collectively.

# 4 ETHICS AND MORALITY

Wind Sweden AB's ambition is to constantly exceed the demands that customers and other stakeholders place on the quality of our services / products. We keep our promises in customer relations and in internal work. We conduct our business with high integrity and morals and follow our high ethical rules. We also take responsibility for our actions. We require all employees to be aware of and follow our purchasing guidelines and take responsibility for our costs as far as possible. In order to maintain our business ethics, we shall never act in violation of applicable competition laws, e.g. by abusing a dominant position, engaging in illegal industry cooperation, e.g. through cartel formation or being involved in counterfeiting goods. We also carry out our work with confidentiality in mind and we ensure that no unauthorized persons or companies receive confidential information internally or from our suppliers. We all behave in an ethically justifiable way.

# 5 BRIBES AND GIFTS

We never accept, directly or indirectly, bribes or other undue benefits or allowances, for the benefit of the business and/or for financial gain. Employees may receive and offer gifts, services, and entertainment from and to customers and suppliers provided that these are not too generous or excessive type. Employees must be attentive against strong expressions of favoritism and neither offer nor receive gifts, services, or entertainment that fall outside of reasonable business practices or specific corporate requirements. We also never offer or give any gift or payment that constitutes or could be construed as a bribe.

# 6 SECURITIES

We comply with the laws on trading in securities. Employees may receive information about Wind Sweden AB or other companies that Wind Sweden AB trades or negotiates with that is "unofficial" – that is, has not come to the public's attention – such as provisional income figures, possible accretions or divestments, marketing plans or introductions of new products. Information is considered unofficial until officially published.

In these cases, employees may not:

- trade in stocks, bonds or other securities within the company or to which the said unofficial information refers.
- use such unofficial information for personal gain for you or others.
- disclose such unofficial information to persons outside Wind Sweden AB.
- discuss such unofficial information with persons outside Wind Sweden AB for no reason.

If the employee leaves his or her employment with Wind Sweden AB, his or her duty of confidentiality regarding such informal information remains until the information has been published to the public.

## 7 ARBETSMILJÖ

Wind Sweden AB strives to create a supportive work environment where collaboration, individual responsibility, innovation and high performance are important core values. The company complies with health and safety regulations and laws and all employees are expected to take responsibility for ensuring that workplaces are safe for themselves and their colleagues. We will annually evaluate the company and employees' views through employee surveys and create joint action plans that are also followed up. We also have a continuous collaboration with our employees to create and develop a safe working environment. We respect that all employees need a healthy work-life balance. The competence of all employees is an important asset, and the company wants to provide all the conditions for individual development.

### 7.1 Alcohol and drugs

No employee shall be under the influence of alcohol or illegal drugs while working. The use of alcohol and other drugs can be a problem for the individual employee as well as for colleagues and the company. Employees who have substance abuse problems should be given support in order to have the opportunity to do their work. Employees must not be involved in any transactions relating to the handling, sale or purchase of illegal drugs. Illegal drugs may not be brought into the premises of the company or the group.

## 8 OUR BUSINESS PARTNERS

We strive to ensure that our suppliers and other business partners are willing to meet the requirements set out in our Code of Conduct. We choose our business partners in a professional, systematic and fair manner. Our negotiations with business partners take place in an honest and fair manner. We promote and respect the trust of our customers and consumers in our company. We do this by providing information about our values and our business. In order to live up to and strengthen consumers' and customers' trust in us, we must have an open attitude in the dialogue with them. We respond to requests from outsiders and communicate quickly, accurately and efficiently. Our Contractors undertake to follow Wind Sweden's core values, which involve contributing to sustainable community building and protecting all living things, fellow human beings, the earth, nature, water and air. The company's core values are aimed at equality between women and men, respect for their fellow human beings, being honest, never exploiting anyone for their own gain.

The contractor will act loyally to the client and not expose sensitive data to competitors, but at every moment observe the best for the good of his client. The client, on the other hand, in the same way strives for responsibility and respect for the contractor so that the client thrives and gets the best conditions to feel well and be able to perform well. The Contractor undertakes to comply with applicable laws and regulations. The UN's eight core conventions on human rights in working life, the UN Declaration of Human Rights and the Convention on the Rights of the Child

## 9 GENDER EQUALITY, DIVERSITY AND DISCRIMINATION

Wind Sweden AB values diversity and equal treatment of people both for our employees and our business partners. We do not accept discrimination or harassment based on gender, transgender identity

or expression, ethnicity, religion or other belief, disability, sexual orientation or age. Nor should anyone be harassed because of political opinion. We will have an equal, attractive and developing workplace for all our employees and work to achieve an even distribution between women and men. It is also important that both female and male views and values should characterize our work and the desire to have equal work teams both in terms of competence and gender. With diversity at work, we take advantage of expertise and increase the opportunities for innovation and growth. We also do not accept any form of victimization in our workplaces. Abusive treatment is defined as 'acts which are directed at one or more workers in an abusive manner, and which may lead to ill health or to be placed outside the community of the workplace'. All employees should feel safe working with us and any violations that nevertheless arise should be handled and remedied promptly.

## 9.1 Salaries and Allowances

We ensure that wages and benefits at least meet the regulatory levels and/or minimum industry standards in the countries in which we operate. We also reward employees with individual salary development through performance without discrimination.

# 10 ENVIRONMENTAL IMPACTS

Wind Sweden AB provides open and factual information about our environmental work to employees and other stakeholders. We actively work to continuously reduce the company's direct and indirect environmental impact. Suppliers are expected to operate in line with our environmental policy. Suppliers should therefore know and comply with requirements under national legislation, regulations and industry standards. This includes having knowledge of and control over one's environmental impact, as well as continuously working on improving environmental measures in their operations. We strive to constantly use the environmentally foremost technology that is economically justifiable in every investment.

# 11 CONFLICTS OF INTEREST

All employees who come into contact with a spouse, family member or other relative or close friend in connection with business with a supplier, customer or third party with whom the Company does business, must immediately notify their superior thereof so that appropriate steps can be taken to reallocate work to avoid possible conflicts of interest.

The following guidelines apply to the most common conflict situations:

- Prohibition that employees own shares or have an ownership interest in any company that competes with or trades with Wind Sweden AB. If the employee has made such an investment before starting his employment, this must be reported to the HR manager. This prohibition does not apply to those who own a small number of shares in a listed company.
- Employees should get the go-ahead from their manager before doing business on behalf of Wind Sweden AB with any company where they themselves or any close family member could in any way benefit from their actions.
- Employees may not work for a supplier, customer or competitor while working for Wind Sweden AB or

- Employees may not perform any work for a third party that could adversely affect the employee's performance – or judgement at work. The company's time, resources or materials may not be used for external work that has nothing to do with the employee's work at Wind Sweden AB.

## 12 COMPANY INFORMATION AND PROPERTY

### 12.1 Protecting Company Property

All employees must protect the equipment that we have in our environment or that is assigned and that will be used in the work. Above all, employees must ensure that valuable electronic equipment, such as laptops and smartphones, is always stored safely. It is not the company's intention to generally monitor e-mail, internet access, etc., but if the circumstances are such that it is required, through e.g. suspicion of crime, this may be done by authorized personnel.

### 12.2 Protecting Company Information

Information about the Company and our employees shall be treated as sensitive information and must be protected and must not be disseminated to unauthorized persons or outside the Company, except for information passed on for specific business purposes.

Examples of sensitive information are:

- financial performance
- acquisition
- divestment
- new products
- strategies
- customer information
- customer assignments
- personnel and organizational information

All employees must be extremely careful that electronic equipment containing sensitive and confidential material (e.g., USB sticks) is not lost or for any reason left to third parties party outside the company. Anyone who handles company information (especially financial data) is obliged to check that it is accurate and reliable. Confidentiality also applies when your employment has ended.

## 13 EVERYONE'S LIABILITY

This Code applies to all employees of Wind Sweden AB. Everyone is expected to have access to and act in accordance with the Code. Managers should notify all their directly subordinate employees of the Code and regularly inform them about it. Although questions of interpretation may arise, the Code describes the requirements that everyone who works for the company is expected to meet. All Wind Sweden AB employees have an individual responsibility to read and comply with this Code of Conduct.

## 14 REPORTING VIOLATIONS

If an employee suspects that a violation of this Code has taken place, in the first instance, immediately the superior shall be informed. If employees are unable to raise the issue with their superior, the HR

manager/HR manager or, in serious and urgent cases, the CEO can instead be informed. We take violations seriously because we see that we have a business that should be characterized by high business ethics and morale. In these cases, we make individual assessments of what has happened and then assess what possible consequences it may have for the individual. However, Wind Sweden AB always strives to offer a supportive climate where employees should feel that they can report cases of suspected violations in confidence.