

Business conduct and ethics

Principles for business partners

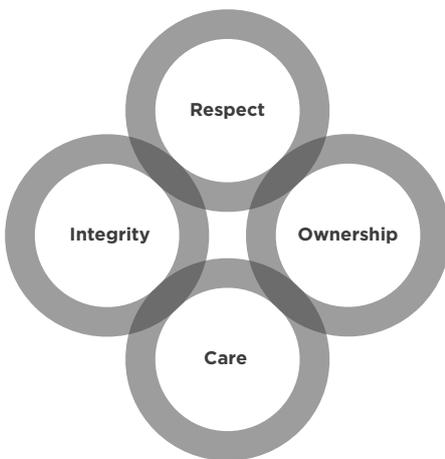
Greenergy statement

Business integrity

At Greenergy, we continually strive to conduct our business respectfully, ethically and honestly. Doing the right thing and in full compliance with the laws is not just a policy at Greenergy; it is embedded in our culture and values.

Greenergy values

Our values underpin every interaction we have, whether with colleagues, customers, suppliers and the communities in which we operate.



We demonstrate these by:

- » Adopting a zero tolerance approach to any form of bribery or corruption.
- » Our transparent approach to corporate hospitality and gifts. It is Greenergy Policy not to request, accept, offer, authorise or provide hospitality or gifts that may improperly influence or create the appearance of improperly influencing business decisions, or decisions made by our Business Partners. It is also not acceptable for any gifts to be sent to Greenergy's employees' personal address.
- » Compliance with economic sanctions, embargoes and other trade restrictions.
- » Adopting a zero tolerance approach to tax evasion and facilitation of tax evasion.

- » Fair competition, which benefits us and all of our stakeholders by contributing to proper performance within the market. Compliance with antitrust laws, competition laws or related regulations.
- » Commitment to avoiding all actual or perceived conflicts of interests and assurance that Greenergy business decisions are not influenced in any way by conflicts of interests.
- » Respect to the privacy of all our Business Partners and commitment to taking all appropriate steps to keep their Personal Data secure and in compliance with applicable data protection laws.
- » Continuous improvement and a rigorous approach to safety and environmental care in compliance with all health, safety and environmental regulations.
- » Open and honest reporting culture that supports understanding investigation, learning and continued improvement.
- » Respect and recognition of Human Rights.
- » Maintaining an environment of mutual respect, which applies to every interaction Greenergy has, with colleagues, customers, suppliers or a member of the public.
- » Commitment to oppose slavery and human trafficking in any form; and compliance with all applicable legislation relating to prevention of slavery and human trafficking.
- » Open dialogue with all its Business Partners in handling ethical challenges.

The Greenergy Business Conduct and Ethics Principles guides how we conduct our business. As a valued Business Partner, the described principles form common requirements for Greenergy and all of our Business Partners. We expect our Business Partners adhere to the same ethical standards and demonstrate their commitment to these values, in all areas of their operations. We believe that maintaining the utmost integrity and transparency in our relationships is vital for our mutual success and growth.

If we believe that our Business Partners are not adhering to these universal ethical standards and principles, we will engage with them in constructive dialogue. We may need to take appropriate measures, if needed, which might create constraints around business relationships.

Application

The Principles apply to the whole Greenergy Group and all Greenergy Business Partners.

Business partners shall be understood as suppliers, customers and agents. As our valued Business Partner, please take all adequate and appropriate steps to ensure that the practices and principles outlined in this document are communicated to the relevant parts of your organisation.

Anti-corruption and anti-bribery

We expect Greenergy Business Partners to conduct its business with integrity and comply with all applicable anti-corruption laws and regulations, e.g. the U.K. Bribery Act and the U.S. Foreign Corrupt Practices Act.

International sanctions

We expect Greenergy Business Partners to comply with economic sanctions, embargoes and other trade restrictions in their business dealings with Greenergy. These restrictions refer to, but are not limited to, trade restrictions administered or enforced by Her Majesty's Treasury, the U.S. Department of the Treasury's Office of Foreign Assets Control, the United Nations Security Council and the European Union.

Tax evasion

We expect our Business Partners to comply with all applicable laws in relation to tax evasion and its facilitation e.g. The Criminal Finance Act 2017.

Fair competition

We expect our Business Partners to comply with all applicable antitrust and competition laws and never take, or attempt to take, unfair advantage of any third party through manipulation, concealment, abuse of restricted information, unfair dealing, or any other act that may unfairly impact competition, such as price fixing or market allocations.

Conflict of interest

Conflict of interest occurs when a person's private interest interferes, or even appears to interfere, with the interests of the company. When acting as a representative of an employer or other party, we are all responsible for avoiding a situation where our ability to act in the best interests of the company is affected.

We expect our Business Partners to conduct their business with Greenergy with commitment to avoid actual or perceived conflicts of interests, which consequently might improperly influence a decision-making process.

Gifts and hospitality

We expect our Business Partners not to offer, provide or solicit anything that might compromise or appear to compromise Greenergy's employee judgment or independence.

Gifts and entertainment given to or received from persons who have a business relationship with the company, if the gift or entertainment is modest in value, appropriate to the business relationship, and does not create an appearance of impropriety might be acceptable. No cash or cash equivalent payments should be given or received.

Data protection

We expect all our Business Partners to comply with all applicable data privacy and information security laws e.g. UE General Data Protection Regulation and industry best practices, when processing our personal data. We also expect our Business Partners to implement adequate safeguards and maintain the confidentiality of all Greenergy information; and not to disclose such information to third parties without prior written consent from Greenergy.

Health, safety and environment

As our Business Partners, we expect you to share our approach to health, safety and environment to minimise any adverse effects and impact on the community and environment, simultaneously safeguarding the health and safety of the public.

Human rights

We expect our Business Partners to comply with all legislation in the area of Human Rights and encourage them to take steps in creating a respectful, positive and inclusive environment for their employees and other stakeholders, build upon respect to the dignity, honour and reputation of each individual.

Modern slavery and human trafficking

We expect that all our Business Partners oppose slavery and human trafficking in any form and that in its operations comply with the same or equivalent standards as stated below:

- » To comply with all applicable legislation in the jurisdiction in which business is conducted relating to prevention of slavery and human trafficking (e.g. the UK Modern Slavery Act 2015);
- » To adhere to good employment practices (e.g. working hours); and
- » To take practical and reasonable steps to verify whether supply chains are free from slavery and human trafficking.

Mutual cooperation

Greenergy is dedicated to maintaining an open dialogue with all its Business Partners.

Our joint efforts in handling ethical challenges relating to the principles described in this document, will contribute to creating an ethically strong business environment. Greenergy is committed to take all reasonable and practical steps to actively cooperate and engage with its Business Partners should challenges of an ethical nature ever arise. Similarly, an active cooperation from our Business Partners is expected and highly appreciated.

Reporting wrongdoing

Greenergy values transparency, business integrity and ethics.

We expect and encourage our Business Partners to report actual or potentially inappropriate or illegal conduct or any related concerns performed by a Greenergy employee or any associated third party, which is acting on Greenergy's behalf.

Reports can be made directly to the Greenergy Legal and Compliance Department on the email address provided below.

Greenergy Legal and Compliance Department
legal.compliance@greenergy.com