

Supplier Code of Conduct

Approved by the Board of Directors on November 24, 2022¹

Any violation or suspicion of violation of the Supplier Code of Conduct can be reported to Econergy's management

Reports can be submitted via the Global Compliance Helpline: <https://econergy.integrityline.com>

1 SCOPE AND APPLICABILITY

Econergy (also called “the Company” or “the Group”) aims at conducting its business in an open, honest, and ethical manner and has embarked on a journey of continuous improvement to be recognized for corporate responsibility.

The Group maintains its corporate governance and business ethics standards in its relations with suppliers and therefore actively strives to implement socially responsible supply chain and anti-corruption practices. Also, Econergy is committed to the creation of a positive impact for local communities in the places where renewable plants are based and to supporting local businesses and utilizing local resources wherever possible.

The Supplier Code of Conduct is aligned with the principles of the Group's Code of Ethics and the Antibribery and Corruption Policy². Suppliers entering into agreements with Econergy are expected to operate with similar ethical values and to adopt equivalent corporate responsibility policies. The Supplier Code of Conduct applies to suppliers, their affiliates and subcontractors.

2 ETHICS, TRANSPARENCY, AND COMPLIANCE

In the provision of their contractual services, suppliers are required to adhere to the principles contained in the Group's Code of Ethics and to the Antibribery and Corruption Policy. Among requirements in terms of ethics, transparency, and compliance, the following aspects must be met:

- Suppliers shall not practice or tolerate any form of bribery, corruption, extortion, or embezzlement.
- Suppliers will not offer or accept bribes or other unlawful incentives to/from their business partners.
- Suppliers shall not offer to Econergy's employees, contractors, advisers, consultants, or any other person or entity related to the Group any gifts or any other kind of personal benefits.
- Suppliers will conduct their business in compliance with all applicable laws in the provision of products or services and in line with fair competition and with all applicable antitrust laws.
- Suppliers will safeguard and make only appropriate use of confidential information and ensure that all employees and business partners are protected.
- Suppliers must comply with all relevant local and national laws relating to the privacy and security of personal data, including the European Union General Data Protection Regulation (EU GDPR), and have a process to ensure that their sub-suppliers, service providers, and subcontractors, comply with all such laws.
- Suppliers will provide means for their employees to report concerns or potentially unlawful activities in the workplace. Any report must be treated confidentially. Suppliers will investigate such reports and take corrective actions if needed.

¹ Updated in December 2024.

² Econergy's Code of Ethics and Corporate Policies can be found on our website: <https://www.econergytech.com/ethics-and-governance/> .

3 HUMAN RIGHTS AND LABOUR

Suppliers are expected to protect the human rights of their employees and to treat them with dignity and respect. The following aspects must be observed, also concerning relations with any sub-suppliers and with local communities:

- Any form of slavery and human trafficking is not tolerated. Suppliers will not use forced or involuntary labor, including indentured or slave labor.
- Suppliers must avoid any sort of child labor and only employ workers who meet the applicable minimum legal age requirement in the country.
- Suppliers will treat their employees fairly and give them the full rights to which they are entitled under any relevant law.
- Suppliers will comply with all applicable laws on wages and benefits and with working time laws, not exceeding the maximum set at the country level.
- Suppliers will respect employees' right to free association and collective bargaining.
- Suppliers will treat all employees in an equal way and will not discriminate against employees – whether consciously or unconsciously – concerning any condition or characteristics such as race, national origin, age, physical aspects, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity or gender expression.
- Suppliers must ensure that their employees are not harassed in any way and must provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, corporal punishment, torture, mental or physical coercion or verbal abuse, or the threat of any such treatment.
- Suppliers must endeavor to conduct business in a way that builds social capital and achieves a positive impact on local communities.
- Suppliers shall have a clear policy or procedure to avoid knowingly purchasing conflict minerals, if applicable to their products. In particular, suppliers shall have a policy or procedure to reasonably assure that minerals in their products do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. Suppliers shall exercise due diligence on these minerals' source and chain of custody and make their due diligence measures available upon Econergy's request.

4 HEALTH, SAFETY, ENVIRONMENTAL, AND QUALITY

Suppliers are required to provide a safe and healthy working environment and, if applicable, safe, and healthy company living quarters, and to operate in an environmentally responsible and efficient manner. Suppliers will integrate quality into their business processes. The following aspects should be observed:

- Suppliers must comply with all applicable quality, health, and safety regulations of the Country where they work. All required permits, licenses, and registrations will be obtained, maintained, and kept up to date.
- Suppliers will fulfill their operational and reporting requirements. All necessary relevant information related to health, safety, environment, and quality will be made available by suppliers and will be provided to Econergy and other parties in case of a legitimate need.
- Suppliers must meet generally recognized or contractually agreed-on quality requirements to provide goods and services that consistently meet Econergy's needs.
- Suppliers must have safety programs in place for managing and maintaining all their processes by the applicable safety standards.

- Suppliers must comply with all applicable environmental laws and Econergy's environmental policies and will implement systems to manage environmental impacts.
- Suppliers are expected to implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement concerning the expectations outlined in this Supplier Code of Conduct.

Nothing in this Supplier Code of Conduct should derogate from any of the supplier's liability and responsibility under the applicable law. The supplier remains fully accountable for complying with all relevant legal and regulatory requirements, irrespective of the terms outlined in this document.