



Engineering the Foundation
for Future Generations

Baettr Supplier Code of Conduct

To our Suppliers, Sub-suppliers and Business Partners,

It is Baettr's mission to make clean, renewable wind energy the most preferred and widely available source of energy in the world. Being part of Baettr entails you understand that creating a better place for future generations is not only profitable – it is truly needed and enriching.

To succeed with this mission, Baettr requires our suppliers, sub-suppliers, and other external business partners regardless of the goods or types of services they offer (in the following "Partners") to maintain and develop business practices throughout their businesses, that comply with certain values, best practices as well as all applicable internationally recognized standards and laws. These values, best practices and standards are described in this Baettr Supplier Code of Conduct (in the following the "Code of Conduct") and are based on the following internationally recognized standards:

- The United Nations Global Compact derived from:
 - The Universal Declaration of Human Rights
 - The International Labor Organization's Declaration on Fundamental Principles and Rights at Work
 - The United Nations' Convention Against Corruption
 - The Rio Declaration on Environment and Development
- UN Guiding Principles for Business and Human Rights
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Hence, this Code of Conduct acts as guideline for our everyday life at Baettr, whereby they make up a common platform internally within Baettr as well as externally in relation to our Partners.

The requirements of the Code of Conduct are in addition to the provisions of any agreement or other legal requirements that form part of the relationship between the Partner and any relevant Baettr entity, as applicable. Where this Code of Conduct and the laws and regulations may differ, Baettr expects Partners to apply the highest standard.

1. Ethics and integrity

We, Baettr, undertake to comply with applicable law and regulations.

Therefore, we also require our Partners to comply and act in accordance with applicable law and regulations in all jurisdictions relevant to their individual businesses and we expect our Partners to strive to comply with all relevant industry standards in the same way we do.

a) Anti-corruption and bribery

Corrupt behavior or bribery is not accepted in any way. The Partners' employees are strictly forbidden from directly or indirectly accepting, soliciting, offering or receiving bribes, or any other unlawful gratuity, facilitation payment, or advantage, even under pressure. This prohibition also applies to areas where such activity may not violate local law or where custom would suggest it to be acceptable.

Employees of our Partners must not seek to receive unjustified advantages from public officials or employees of private companies, including their relatives, agents, or associates. Engaging in actual or potential conflicts of interest related to business, financial matters, or personal benefits is strictly prohibited.

b) Gifts and hospitality

Partners must not offer or accept gifts or similar of value to obtain improper advantages or influence for the Partner for Baettr (including Baettr employees and/or their family members and associates), or for any third party. Gifts include but are not limited to benefits, fees, commissions, dividends, cash, gratuities, services or any inducements.

c) Conflict of interest

Baettr expects its Partners to avoid all conflicts of interest that could have a negative impact on business decisions. Partners who are affected by a potential or specific conflict of interest in their activities relating to Baettr are expected to disclose and resolve the specific matter regarding this immediately to Baettr. When it comes to the initiation of business relations, purchasing or hiring decisions, it is imperative that the selection and decision process is transparent, in accordance with objective criteria and documented to the extent possible.

d) Fair competition

Baettr advocates fair, unadulterated, and free competition; compliance with applicable antitrust and competition laws is a must for us.

Well-judged care must be taken especially in respect to any agreement or exchange of information with competitors and all such activity must comply with the applicable antitrust and competition laws. The submission of sham offers for invitations to tender and allocation of customers or regions between competitors are also strictly prohibited. This covers not only formal agreements, but also concerted practices, such as informal discussions or informal gentlemen's agreements.

To secure compliance with applicable laws and regulations, Baettr maintains relevant and sufficient control procedures and processes, as well conducting risk assessments. Thus, the same as the abovementioned is expected by Partners and non-compliance with applicable legislation and regulations cannot be tolerated.

e) Money laundering

Money laundering is the process by which potentially large amounts of illegally obtained money (e.g., from drug trafficking, bribery or actions in non-compliance with internal laws or sanctions) are given the appearance of having originated from a legitimate business.

Baettr expects its Partners to ensure that Baettr cannot be misused for money laundering or other illegal purposes and Partners must not themselves engage in money laundering or any other improper or unlawful payment under any circumstances.

f) Fraud

Fraud is the act of dishonestly obtaining a financial or other benefit (either directly or indirectly) by deception. Fraud includes deliberate and premeditated deception to gain advantage from a position of trust and authority. This includes but is not limited to acts of omission, theft, making false statements, evasion, manipulation of information and numerous other acts of deception.

Baettr are committed to detecting and preventing fraud. Hence, there is no tolerance of fraud involving Partner with a business association with Baettr.

g) Trade regulations and sanctions

Baettr's Partners must comply with all applicable export, import, customs and trade regulations, sanction regimes and other applicable international trade regulations.

2. Data privacy and security

Baettr expects its Partners to protect the privacy of individuals as well as the security and protection of confidential information.

a) Confidential information

Baettr's Partners are obliged to ensure that any confidential business information, trade secrets or intellectual property related to our business activities are kept strictly confidential, protected from unauthorized disclosure and access by third parties, both within and outside the business relationship.

b) Personal information and privacy

Baettr requires Partners to protect personal information in compliance with all applicable laws and regulations. Personal information provided by or on behalf of Baettr must only be used, accessed, and potentially disclosed as agreed in writing with Baettr and in compliance with all applicable laws and regulations.

3. Human and labor rights

a) Health and safety

The safety of employees must never be compromised to meet business targets. Hence, Partners must comply with all applicable health and safety laws and regulations.

Baettr's Partners are expected to provide a safe working environment that supports incident prevention and minimizes exposures to health risks, including both physical and mental wellbeing. Employees must be protected against chemical, biological or physical hazards. Physically demanding activities and conditions in the workplace, as well as risks arising from the use of the infrastructure available in the workplace, must be managed in such a way that employees are protected from hazards.

Our Partners must provide adequate controls, appropriate/mandatory training, safe work procedures, adequate maintenance and the necessary technical protective measures and personal protective equipment (PPE) to reduce health and safety risks in the workplace and to prevent accidents and occupational illnesses.

All injuries or accidents must be recorded and investigated to avoid similar future incidents.

Monotonous, repetitive work as well as isolated, remote work which may be hazardous to physical or psychological health, is avoided or limited as much as possible.

Baettr expects its Partners to replace all substances used that pose a risk to health and the environment with less hazardous products wherever possible. Activities requiring the use of substances with a particularly high-risk potential (SVHC) shall be considered on a case-by-case basis and monitored separately.

Baettr's Partners are required to develop emergency preparedness and action plans suited to relevant work activities and situations. Our Partners must provide appropriate and adequate first aid arrangements for their employees.

b) Discrimination and harassment

Baettr demands that our Partners comply with all applicable laws and regulations relating to discrimination in hiring, employment practices, and harassment and retaliation. Partners must operate workplaces free of unequal treatment in employment, discrimination, harassment, victimization, and any other abuse on any grounds including but not limited to age, health status, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religion or beliefs, union affiliation, or veteran status. Unequal treatment includes the payment of unequal remuneration for work of equal value.

c) Child labor

Baettr strictly prohibits any use of child labor as per the principles and in accordance with the United Nations Global Compact and the standards of the International Labor Organization. Verification of workers' age prior to employment is mandatory, and this verification must be documented in personal files.

d) Forced labor

No form of force, threats, or disciplinary means are to be used to compel people to work. No forms of modern form of slavery or human trafficking are allowed, and all employees shall be free to leave the workplace without restraints or fear of reprisal.

e) Employment laws

Baettr's Partners must comply with all applicable wage and labor laws and regulations. Baettr requires Partners to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch, and outsourced labor shall be in accordance with all applicable laws and regulations.

f) Freedom of association

Baettr expects its Partners to maintain open and constructive communication with their employees and employee representatives. The employees right to collective bargaining must be respected, and there must be no attempt to influence the employees to be members of a particular trade union, interfere with the formation of trade unions or associations, or dismiss employees based on their union affiliation.

g) Local communities

Baettr expects its Partners to actively collaborate in engaging, consulting, and being responsive to potentially affected local communities. It is important to avoid causing or contributing to negative impacts on local culture, cultural heritage, health, education, environment, livelihood, or the general standard of living. Furthermore, our Partners are expected to respect the land rights of legitimate rights holders and legacy holders.

4. Sustainability / Environment

Baettr's Partners must integrate environmental considerations in their activities and strive for continuous improvement, by minimizing any adverse effects of their activities and products on the environment.

All Partners must comply with relevant local and national environmental laws and regulations, as well as all requirements for environmental licenses and permits.

Partners shall strive to develop and implement environmental procedures that include measurement and monitoring to identify environmental risks and impacts and to ensure pollution prevention measures are in place. They must strive to reduce waste, energy, and emissions to air, ground, and water.

Baettr's Partners are expected proactively to continuously reduce the greenhouse gases (GHG) emissions connected to the products, services and activities performed. The handling, storage and disposal of hazardous materials such as chemicals and/or waste must be done in an environmentally safe manner. Partners shall contribute to the recycling.

a) Environmental footprint

It is required from Baettr's Partners to comply with all applicable environmental laws, regulations and conventions always as well as regarding the potential use, handling and disposal of hazardous waste, mercury, persistent pollutants and similar substances.

Additionally, Baettr expects Partners to measure, manage, and address energy usage and greenhouse gas (GHG) emissions. Where applicable, our Partners are also expected to measure, manage, and reduce water or other natural resources and waste in its operations. Baettr hence requires Partners in general to address their environmental risks and impacts.

b) Baettr's Partners are obliged to adhere to OECD Due Diligence Guidance for the appropriate management of minerals and metals in their supply chains. They should ensure that minerals and metals, including gold, tin, tungsten, and tantalum, are supplied from responsible or conflict-free areas only. We rely on our suppliers to manage this and to be able to provide information on the origin and sources of the minerals and metals they use, if relevant for the products supplied to Baettr.

5. Reporting

Baettr expects our Partners to report observations of illegal or unethical behavior or serious or sensitive concerns that could have adverse impact on people, environment or the business of Baettr. This includes any non-compliance with the requirements of this Code of Conduct.

In case of such a misconduct or concern, please report the matter by using this email:

compliance@baettr.com

6. Supply chain and enforcement

Baettr is part of a supply chain that consists of several parties. Being part of Baettr's supply chain, all Partners must undertake to oblige any of its, direct or indirect, sub-suppliers or third parties involved in Baettr's supply chain to acknowledge and act in accordance with principles and requirements at least equivalent to those set out in this Code of Conduct in all respects.

We urge our Partners to ensure compliance with principles and requirements at least equivalent to those set out in this Code of Conduct by regular audits and evaluations of their sub-suppliers. In case of any non-compliance with the requirements of this Code of Conduct by any such sub-supplier, our Partners shall without undue delay inform its representative at Baettr and/or report in accordance with section 5 Reporting above.

Baettr's Partners shall always be able to document its compliance and process of compliance with the principles and requirements of this Code of Conduct, and if requested by the representative at Baettr give access to reasonable documentation to this effect.

Baettr shall be allowed to audit Partners upon giving prior reasonable notice.

If Baettr discovers a breach of the requirements of this Code of Conduct and the breach is not remedied within a reasonable notice given by Baettr, Baettr has the right to terminate its ongoing business activities with the partner concerned without further notice.

All Partners shall, in any case, indemnify Baettr against any loss, penalty, damages, or the like, that Baettr may suffer because of the Partners', including any sub-suppliers', failure to comply with the requirements of this Code of Conduct.

7. Compliance declaration

We ask that you, as a Partner to Baettr, confirm the following by completing and signing this Code of Conduct:

- You have read and understood the contents of this Code of Conduct.
- You are aware of all relevant laws and regulations in the countries of operation.
- You are aware of relevant industry standards.
- You will comply with the requirements of this Code of Conduct.
- You will inform your employees, sub-suppliers and business partners, as relevant, of the requirements of this Code of Conduct and ensure their compliance with such requirements.

We look forward to continuing the journey we are on with you as our Partner.

Date of initial adoption,

July 1, 2024

Lem, Denmark


Peter Pallishøj
CEO


Thomas Rahbek
CFO

On behalf of Partner

Company name:
Company reg. no:
Address:
Country:

Date:

Name(s):
Title(s):