

Code of Conduct





Introduction

The Flex Wind Group has a value set where safety, quality, flexibility, teamwork and trust are key components in everything we do. Our values combined with the purpose of our business, which is installing, repairing and re-furbishing machinery in the sustainable energy industry, gives us a guiding star and commitment to conduct business ethically and responsibly. We think relevant topics in from the strategic engagement all the way down to our daily operations, creating an end-2-end responsibility.

We seek inspiration in and are guided by the Ten Principles of the UN Global Compact and the Sustainable Development Goals on our CSR journey. In addition, the Flex Wind Group is guided by the Organisation for Economic Co-operation and Development's (OECD) Guidelines for Multinational Enterprises' recommendations on responsible business conduct.

Accordingly, we respect all internationally recognized human rights, including the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work and we support the sustainability agenda and the Sustainable Development Goals.



Purpose

This Code of Conduct sets out the expected standards and behaviors of all our employees throughout the Flex Wind Group.

Flex Wind expects all employees to abide by this Code of Conduct in all circumstances. All employees will receive a copy and complete a mandatory training on its content. Any employee that fails to adhere to the Code of Conduct may face disciplinary actions, including dismissal with or without notice.

Our Code of Conduct is not merely a piece of paper but a way of life and everyone throughout our company needs to step up and take responsibility for living this Code of Conduct. If something isn't right, everyone needs to act trustworthy and speak up about the issue.

Commitment

Our Code of Conduct standards are set up in the following categories:

- Compliance for health, safety and the environment
- Compliance for fair business activities
- Compliance for human rights; and
- Compliance within IT Security and data privacy

All standards are supported by further policies and/or guidelines and statements.



Compliance for health, safety and the environment

1. Safe working environment

We must protect the health and safety of ourselves and our co-workers by maintaining safe equipment, working conditions and working procedures. Besides following related laws and company rules, we should continue to take an active part in safety initiatives, with the aim of reducing workplace accidents to zero.

2. Caring for the environment

We must follow all laws and company rules that relate to the environment, disaster prevention and the handling of chemical substances, based on the principle that we must leave the environment in a better state. We should strive to reduce the impact that our business activities, products and services have on the environment, while also promoting diversity and sustainable use of resources. We should encourage the development and use of environmentally friendly technologies. We should promote to other that they take greater environmental responsibility, including our supply chain.

Compliance for fair business activities

1. Competing fairly

We must not participate in cartels or other illegal concerted practices, unfair treatment of business partners, or any conduct violating competition laws of each country/region. We must not give or receive bribes both in relation to public officials and other business partners or participate in any other form of corrupt practices. We must eliminate any conflicts of interest that can occur when our private interest influences our business conduct, including in employment relations and in regards to gifts and hospitalities.

2. Fair transaction and asset management

All transactions including purchase, sales and payment of expense must be done appropriately in accordance with the law and general accounting principles. All company assets such as inventories and fixed assets must be controlled, used and maintained for business purpose only.

3. International trade control and security trade administration

We must follow the relevant laws and regulations and comply with appropriate import and export procedures and trade controls when purchasing, exporting or importing products, machines, materials and samples, or when sharing our technology overseas, to avoid violation of sanctions imposed by the United Nations and governments such as the United States.

4. Compliance with applicable laws in general

We must acknowledge that a violation of laws and regulations could undermine trust in the company and comply with any and all laws and regulations.

Compliance for human rights

1. Compliance for human rights.

We must support and respect the protection of internationally proclaimed human rights and ensure that we are not complicit in human rights abuses.

2. Compliance for labor rights and workplace values

We must uphold an inclusive and respectful workplace and promote diversity, paying specific attention to women, migrants, indigenous people, and vulnerable groups. We will not use forced labor or child labor. We will support freedom of association and the effective recognition of the right to collective bargaining. We should be mindful of the importance of close communication in promoting mental health in the workplace. Showing respect for others helps to create a positive and healthy work environment for all and eliminates harassment in the workplace.

Compliance within IT Security and data privacy

1. Compliance for technology

We will ensure that our IT is secure in order to protect our employees, business information and our clients. We will use technology and SoMe responsibly and with high integrity when using this professionally. We will allow for monitoring only as needed and proportionally to the need to protection.

2. Compliance for data privacy

We will protect the personal data of all individuals that we have information on. We will implement the same rules globally to ensure a satisfactory level of protection across the globe, regardless of local requirements not applying the same standards. We will provide the data subjects with their rights.



Reporting on non-compliance

To show the Flex Wind Groups commitment to our Code of Conduct, we encourage all employees to report non-compliance, either directly to a manager, HR or Legal or anonymously through our whistle blower system – “[Safe-to-Whistle](#)” which is an external provider to best ensure anonymity to a whistle blower.

Governance

Because the World is under constant change and the Flex Wind Group is a company which has embarked on a growth journey, there is a need to monitor and change the Code of Conduct to fit the strategy and to improve the World.

In the Flex Wind Group, the group Legal department is responsible for monitoring and reviewing the Code of Conduct and associated policies.

Promise

We need to do a little better tomorrow than we did today.