



# **Our Code of Conduct** **How we do business**

An overview of Policies guiding our relationships with each other and with our stakeholders



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# Message from the CEO

Sustainable and ethical companies are more successful companies. Our business model as a renewables company rests on our commitment to carry out our activities in an ethical and responsible manner while creating a positive impact for society, our stakeholders and shareholders.

Our Code of Conduct guides how we do business. Everyone working for us shall uphold the values, responsibilities and principles of this Code. Our performance depends on how our Board, management, staff and contractors carry out their tasks.

The principles set out in this Code align with those of the United Nations Global Compact (UNGC). By adhering to the UNGC in 2010, we committed to uphold and promote its ten principles on human rights, labour, environment and anti-corruption. We have endorsed the Universal Declaration of Human Rights, the ILO Tripartite Declaration, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

We require everyone working for Orrön Energy to abide by the Code and thereby contribute to the Company's success.

**Daniel Fitzgerald, CEO**

# What does our Code of Conduct mean for us?

This Code of Conduct constitutes the commitment of the Company, its employees, contractors and business partners to act in accordance with high ethical standards. We live by this code, and we promote compliance under this Code throughout our operations. Its expectations are integrated in our policies, guidelines and management systems. We provide our employees with regular training on the Code's requirements and we expect management to lead by example and managers to encourage open and frank discussions.

## How do we hold ourselves accountable against our Code of Conduct?

### We speak up if something doesn't seem right and expect others to do the same

We are all expected and encouraged to alert the Company in case we, in good faith, suspect a violation of laws or a breach of our Code of Conduct. If employees suspect a breach to the Code they should:

- Talk to their line manager or their supervisor, or
- Talk to someone in the Legal department, or
- Raise their concern in line with the Whistleblowing Policy.

### Our business partners

We expect external counterparties we do business with to report suspected violations of laws or breaches of this Code of Conduct to their contact within the Company or in accordance with locally established procedures. All external counterparties are also required to sign the Company's Contractor Declaration, which establishes their commitment to work in accordance with ethical principles adhered to by Orrön Energy.

### Violations of our Code of Conduct

Any violation of the Code of Conduct, which is an integral part of employment and supply chain contracts, will be the subject of an inquiry and appropriate measures.

## Our business philosophy and our Code of Conduct

Our mission is to help drive the energy transition by producing renewable energy, at low cost and in a safe and responsible manner. We create value by fostering a culture of responsible entrepreneurship, with a team dedicated to producing reliable and low carbon intensity energy.

### We act in a sustainable manner, ethically and responsibly towards:

- Our shareholders, to realise and sustain a good return on investment and the continued growth of our business
- Our employees, contractors and business partners, to provide a safe and rewarding working environment
- Our communities around where we operate, to ensure we engage and understand their expectations on us
- The environment, to minimise our carbon footprint and our impact on biodiversity
- Wider society, through providing the world with clean, renewable power that supports the energy transition

## **Our shareholders**

**We seek to create value for our shareholders by achieving high standards of performance in our activities while taking into consideration the interests of our stakeholders. To that end, we aim to:**

- Generate sustainable value through ethical business practices
- Add value through organic growth and acquisitions
- Promote and foster a culture of entrepreneurship and innovation throughout our activities
- Seek high ethical standards from business partners and contractors
- Practice free and fair competition
- Understand our material environmental, social and governance impacts on internal and external stakeholders and build these into our way of working to reduce risk and capitalize on opportunities

## **Our Employees, Contractors and Business Partners**

**We expect everyone working for the Company, including contractors, to follow ethical business practices. To that end, we expect everyone working for the Company to:**

- Observe national and international laws, regulations and industry standards
- Uphold internationally proclaimed principles on human rights including promoting the ten principles of the United Nations Global Compact on human rights, labour standards, environment and anti-corruption
- Respect for the diversity of people and ensure equal opportunity without discrimination based on age, nationality, ability, sex, gender identify, sexual orientation, race, religion, or any other personal characteristic
- Zero tolerance for harassment or bullying
- Respect and promotion of employees' rights, including freedom of association and the right to collective bargaining
- Zero tolerance for any direct or indirect use of child or forced labour throughout our supply chain
- Respect of data privacy of individuals consistent with national regulations
- Use of appropriate security measures to protect individuals and operations
- Avoid and disclose conflict of interests in business dealings and do not engage in any form of corruption or money laundering practices
- Behave according to best practice in terms of health, safety and security
- Encourage anyone working for the Company to blow the whistle if needed.

## **The Environment, society and communities**

**We aim to minimise our impact on the environment, and create a positive impact for communities and society by integrating sustainability into our business model. To that end, we:**

- Engage with the communities where we operate to understand potential concerns, expectations on us, and identify where we can drive positive impacts
- Minimise our carbon footprint through efficiency and innovation
- Reduce our impact on the local environment and biodiversity in the areas where we operate
- Directly support the energy transition by helping to mitigate climate change impacts through provision of renewable power

This code of Conduct is based on the same strong governance structure the Company has had since the start and has been adapted to the new renewables business of Orrön Energy. It has been approved on July 1<sup>st</sup> 2022 by the Board of directors and will be reviewed every other year or when needed.

# Corporate policies

Orrön Energy has implemented corporate policies covering areas material to us. They contain the minimum requirements that apply to all of us in our daily work and are included herein.

Our Code of Conduct is more than an acknowledgment of applicable rules. It represents a personal commitment to take responsibility for our actions, in-line with the highest ethical standards, and all employees are expected to be familiar with its content.





# OUR CORPORATE POLICIES

# Health and Safety Policy

**A strong health and safety culture is essential to the success of Orrön Energy.**

**Our objective is to provide a safe working environment for all employees, contractors and others who may be put at risk by the activities of the Company.**

The control and management of health and safety risks are considered at all stages of operational and commercial activities. This requires close collaboration and communication with contractors working on behalf of the Company, especially in the installation and construction stage of asset development.

**Health and safety is the highest priority in all our operations and therefore we adhere to the following principles:**

**Management shall clearly define health and safety objectives and targets, including:**

- Promoting a healthy work environment
- Preventing occupational illness and hazards
- Reducing risk to personnel
- Reducing health and safety hazards
- Promoting risk identification
- Preventing loss of asset integrity

**Health and safety hazards must be identified and potential risks must be prevented, corrected or controlled. Employees who are responsible for contractor relations and assets are expected to:**

- Ensure that contractors have proper personal protective equipment for their operations.
- Make sure that employees and contractors understand and follow safe work procedures.
- Ensure that hazard correction procedures are in place where relevant.
- Ensure that contractors maintain equipment regularly and thoroughly.
- Ensure that contractors have the ability to report incidents to the Company, without risk of reprisal in-line with our Whistleblowing Policy.

**To achieve a strong health and safety culture that effectively minimises potential risks we ensure that:**

- Clear roles and responsibilities are set within the organisation.
- Goals are set and reported on, and appropriate health and safety KPIs and performance are reported on externally and to the Board of Directors.
- Each operating asset has health and safety staff to provide specialist advice in order to reach the Company's goal of zero fatalities and zero serious incidents.
- Contractors have the knowledge and capability to conduct operations in a manner that is consistent with sound health and safety practices.
- Processes for systematic identification and management of hazards are implemented, with appropriate risk assessments and subsequent actions to minimise exposure.
- In case of unexpected incidents or events, priority is given to prevent harm to individuals, the environment, assets



# Environmental Policy

**Orrön Energy ensures that protection of the environment is central to all of our operational activities.**

**Renewable energy is central to achieving the international goals established under the Paris Agreement for sustainable development and our mission is to help drive the energy transition by producing renewable energy, at low cost and in a safe and responsible manner. To this end, we conduct our activities in a manner that respects the environment, and in compliance with all applicable environmental laws and regulations. We support the objectives expressed in the Convention on biological diversity and respect for the protected areas as defined by IUCN, UNESCO and RAMSAR.**

We aim to minimise the potential impact of our operations on the environment, through identification, reduction, mitigation, monitoring and disclosure of environmental impacts. The requirements of this Policy shall also be considered when conducting due diligence on, and working with, suppliers, contractors, key business partners, and potential mergers, acquisitions or investments.

**To advance a strong environmental culture that effectively minimises potential impacts and risks of incidents, we define objectives and targets to:**

- Detect potential environmental hazards and minimise current and potential risks through prevention, correction or implementation of controls.
- Safeguard ecosystems, species and genetic diversity.
- Promote energy efficiency, low-carbon innovation and reduce absolute greenhouse gas emissions.
- Prevent unnecessary waste, and sort, recycle and recover waste as much as possible.
- Manage water consumption and effluents with due consideration of the needs and requirements of other stakeholders.

**To achieve our environmental objectives and targets we ensure that :**

- Goals are set and reported on, and appropriate environmental KPIs and performance are reported on externally and to the Board of Directors.
- Contractors have the knowledge and capability to conduct operations in a manner that is consistent with sound environmental practices.
- Potential impacts on biodiversity and climate change within the scope of the Company's operations are managed.
- Environmental baseline studies and impact assessments are conducted for new operations, phases or investments in new assets in consultation with local stakeholders and biodiversity experts, in-line with legal requirements and best practices.
- Environmental risks identified are reduced and mitigated as much as possible.

**All our operating entities are expected to:**

Integrate and monitor biodiversity in their environmental management planning and decision making processes, including ongoing engagement with local stakeholders. Where possible, land use changes that arise from the construction or operation of assets shall be compensated for through additional biodiversity enhancement or protection programmes.

# Human Rights Policy

**Orrön Energy is committed to respect human rights wherever we operate.**

**We are vigilant in respecting international human rights standards and we base our approach is based on the United Nations Guiding Principles on Business and Human Rights.**

We have endorsed the United Nations Declaration of Human Rights, the ILO Tripartite Declaration, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

**We adhere to the following principles:**

We are committed to respect internationally recognised human rights and not to infringe on individuals' human rights, be complicit or contribute directly or indirectly to human rights abuses.

Human rights are to be understood as those referred to in the:

- Universal Declaration of Human Rights.
- International Covenant on Civil and Political Rights.
- International Covenant on Economic, Social and Cultural Rights.
- International Labour Organization's (ILO) Conventions.

and those referred to in relation to business activities of the:

- UN Global Compact.
- OECD Guidelines for Multinational Enterprises.
- UN Guiding Principles on Business and Human Rights.

**In practice, these principles are translated into actions which are relevant to our geographical and operational context:**

We respect all human rights, and in day to day activities we focus on those human rights that potentially could be impacted, directly or indirectly, by the Company's activities such as employees and the supply chain.

We also recognise the importance of respecting the rights of local communities, and thus prior to any new investment, we analyse potential impacts of planned activities.

We commit to monitor and report on potential human rights impacts, and act to remedy any negative human rights impacts that are identified. Any identified impacts are handled in accordance with established grievance mechanisms.

**We expect from our employees and business partners to:**

Respect and promote human rights in their sphere of influence and to observe the highest standards of professional integrity.

# Stakeholder Engagement Policy

**Orrön Energy is committed to act responsibly and to engage in an open dialogue with all stakeholders.**

**We believe it is important to hold a continuous and open dialogue with our stakeholders. This does not only help us to develop our business but also to prioritise actions when we develop our sustainability work.**

Our stakeholders are people or organisations which may be affected by or influence the Company's activities, such as shareholders, employees, governments and local communities, as well as business partners, contractors, industry groups and media.

## Stakeholder Engagement

We exchange information and viewpoints with our stakeholders in relation to the Company's activities. It involves sharing operational plans and stakeholders bringing their perspectives or concerns. This process enables us to be aware of and as a result manage stakeholder issues, risks and opportunities.

Stakeholder engagement may take place at a local, national or international level and may cover commercial, environmental, financial, governance, human rights, operational, social and other relevant issues. It may vary in form and timing according to the type of issues involved.

The effectiveness of the Company's engagement with its stakeholders is measured by the mutual benefit obtained through engaging in constructive actions and dialogues with individuals, communities, and institutions as well as the projects resulting therefrom.

## Community Relations

We seek to contribute to enhancing the living standards and wellbeing of local stakeholders, namely the people in or near the areas where we operate, by supporting the employment of local staff where possible and participating in local projects.

Depending on the needs and circumstances in the area of operations, we contribute to projects aimed to improve local socio-economic and environmental factors such as health, positive environmental and community impact, education, etc. These activities are carried out in consultation with representatives of the local community and other stakeholders.

## Sustainable Investments

The Company's sustainable investments may take the form of community development projects or corporate donations. These projects aim to contribute to innovative solutions to social, environmental and economic challenges in areas of operations.

All external counterparties receiving sustainable investments from the Company are required to sign the Company's Contractor Declaration, which establishes the contractors commitment to work in accordance with ethical principles adhered to by Orrön Energy.

# Diversity Policy

**Orrön Energy is committed to provide an inclusive work environment free of any form of discrimination, promote diversity among its workforce and ensure equal opportunities for all.**

**We value diversity and recognise its benefits in attracting a broad pool of quality employees, encouraging employee retention, building high performing teams and enabling more relevant innovation.**

**Therefore we abide by the following principles:**

- We adhere to equality of opportunity and shall not discriminate in all areas of employment and business regardless of individual characteristics including, but not limited to, race or ethnic origin, age, nationality, cultural background, religion, political belief, social or economic class, pregnancy and maternity, family status, sex, sexual orientation, gender identity or disability.
- We promote the rights of every employee equally including offering rewarding work conditions, a safe and healthy working environment and respect of local laws and regulations.
- Fair and non-discriminatory practices shall be applied in respect of recruitment, selection, promotion and career advancement, and training and development for all employees.
- We strive to integrate diversity in employment and in the composition of the Board of Directors in-line with local laws and the Swedish Code of Corporate Governance. The Nomination Committee is to give particular attention to the requirements regarding breadth and diversity of the Board of Directors, as well as striving for gender balance.
- We do not tolerate any form of discrimination, harassment, victimisation or bullying in the workplace.

**The CEO carries overall responsibility to:**

- Ensure that the Company adopts a corporate culture where individual characteristics and differences are respected and that disciplinary action is taken in the event of discriminatory behaviour.
- Ensure that the selection of new hires, employee career development and career advancement take into account fair and non-discriminatory practices.

**We expect from all employees and business partners to:**

- Demonstrate consideration and respect for individual differences and act to prevent any form of discrimination or harassment in the workplace.

# Information Policy

**Through timely, accurate and relevant information we aim to build trust with our investors, business partners, employees and within the communities where we operate as well as with wider groups of stakeholders.**

**The objective of this Policy is to contribute to an effective exchange of information with our investors, analysts, business partners, employees and other stakeholders, and to ensure all information is handled in a secure way.**

## Reliable and timely information

As a publicly listed company, we publish our financial reporting and disclose other information when this is justified or prescribed. All information provided to the market shall be reliable, correct and relevant and shall be provided simultaneously to all stakeholders. To ensure we live up to this ambition and to comply with the EU Market Abuse Regulation (MAR), the Swedish Securities Markets Act and NASDAQ Stockholm rules, we have internal policies and procedures in place.

## Responsibility for content – primary spokespersons

Orrön Energy is legally responsible for the content of its communications. The CEO of Orrön Energy is the primary spokesperson for Orrön Energy. The CFO holds, with the support of the Director of Corporate Affairs and Investor Relations, the responsibility for communication of financial and regulatory information. This includes inside information.

## Inside information

As a company listed on Nasdaq Stockholm, Orrön Energy is subject to regulations relating to publication of insider information, insider trading and market abuse. Orrön Energy discloses inside information, which directly concerns the Company, by means of a press release as soon as possible, unless the disclosure of inside information is justifiably delayed.

All employees are expected to be familiar with the Company's Inside information Procedure, which gives guidance on how to apply the rules governing the handling of inside information within the Company.

## Information system security

Our objective is set to ensure a strong information system security while maintaining an appropriate balance between people, process and technology, and to safeguard compliance with the EU General Data Protection Regulation (GDPR). To ensure we achieve this, relevant measures and barriers are put in place at all levels to protect confidentiality, integrity and availability.

We expect all authorised users to use Company data, information, IT services, cloud services and assets in a responsible and professional manner to safeguard against loss, theft, damage, corruption, unauthorized access or unavailability.

# Anti-Corruption, Anti-Fraud and Anti-Money Laundering Policy

**Orrön Energy has a zero-tolerance policy towards any form of corruption and other financial irregularities, including bribery, kickbacks, facilitation payments, fraud, embezzlement and money laundering.**

**We have a policy to conduct operations in an honest, transparent and ethical manner, observing the highest standards of professional integrity and complying with applicable international and national legislation. Through our internal control framework, we aim to ensure that procedures are in place to assess and enforce the adequacy and effectiveness of our control environment, to minimise the risk of corruption and other financial irregularities. This includes regular and relevant training to employees.**

**We speak up if something doesn't seem right.**

We are all expected to alert the Company in case we suspect a breach of this Policy. Any offer or proposed arrangement contradicting our zero tolerance policy towards corruption and financial irregularity must be reported.

- Talk to your line manager or the superior of your line manager, or
- Talk to someone in the Legal department, or if you are not comfortable with either of these
- Raise your concerns in-line with the process outlined in the Whistleblowing Policy

A suspected breach of this Policy will be investigated and reported to the relevant authorities.

## Anti-corruption

**Orrön Energy prohibits corruption and bribery in all forms by its directors, officers, employees, contractors, consultants and others working for the Company. No individual will be penalised for, or be subject to, adverse consequences for refusing to pay bribes or engaging in other forms of corruption.**

**Therefore we:**

- Resist any demands for illegitimate payments unless your physical integrity is at risk. Record any and all payments requested or made.
- Refrain from any kind of gifts or related expenses to governmental officials and other third parties during an official tender or competitive bidding process.
- Include anti-corruption principles in contractual clauses and ensure contractors' compliance with our Contractor Declaration which establishes the commitment to work in accordance with ethical principles adhered to by Orrön Energy.
- Exercise care with gifts and hospitality; in particular as some companies and countries have very strict limitations on the value and nature of gifts accepted.
- Consider the value and nature of the benefit you intend to offer, as well as the position of the recipient, and that of any benefit offered to you. In case of doubt, consult with the line manager.
- Conduct adequate due diligence reviews of counterparties, including representatives, contractors, joint venture partners, suppliers, etc. and raise immediately concerns about suspected or encountered corruption or bribery.

## Anti-fraud

**Investors, creditors and others have a legitimate interest in Orrön Energy's financial accounts. The integrity of the accounts depends on the accuracy, completeness and timeliness of the entries. All Orrön Energy business transactions must therefore be fully and fairly recorded in accordance with Orrön Energy's Finance Manual. We must always take steps to prevent fraud and financial irregularities. Making false or misleading entries in our records or not completing internal controls is not allowed and may be illegal.**

### Therefore we:

- Ensure that segregation of duties is established and that authorisations and approvals are in place at an adequate level of authority. No one individual shall have single signing authority for payments. All money transfers must have at least two signatories.
- Follow the established authorisation levels.
- Ensure that exposure to fraud is considered when introducing new, or when amending existing systems and processes.
- Record all financial transactions in accordance with applicable rules and Orrön Energy Finance Manual and provide all supporting documentation needed.
- Never authorise payments of vague or unclear expenses or third party invoices that are poorly documented or incomplete.
- Ensure expense reports are complete and accurate.
- Ensure all contracts reflect the substance of the commercial transaction.
- Promote the Company's internal control framework, including awareness training of cyber-security threats for all employees.

### The following situations should trigger a concern:

- Payments to or from a third party in a country other than where the service was provided or from a third party different to the one specified in the contract.
- Payments to a third party in a country known as a "tax haven".
- Pressures to make an inaccurate entry in our accounts or to omit relevant information.
- Revenues or expenses that have been unduly shifted between time periods.

## Anti-money laundering

**Orrön Energy commits to fairness, honesty and openness, which includes complying fully with anti-money laundering laws. Money laundering generally occurs when funds from illegitimate sources are brought into legitimate financial channels to hide them or make them appear legitimate.**

### Therefore we:

- Help to detect possible money laundering activities and to learn to watch for warning signs, for example a customer who is reluctant to provide complete information.
- Identify areas that are vulnerable to money laundering risks and perform risk assessments to determine the likelihood and impact of such risks.
- Never accept assets that are factually known or suspected to be the proceeds of criminal activity, nor enter into or maintain business relationship with individuals or entities known or suspected to be involved in criminal activities or that are subject to applicable sanctions.
- Perform due diligence or Know Your Counterparty (KYC) for business transactions. We take appropriate measures to gain accurate and complete knowledge of the identity and the business of our suppliers, contractors, joint venture partners clients and other business partners.
- Verify the identity and bank details of our counterparties before any transaction is made.
- Ensure that no funds are sent to, or received by any person, customer or company on an anonymous basis or to anyone using a fictitious name.
- Are aware of possible risk indicators such as transactions involving high risk or off-shore jurisdictions or countries or individuals subject to sanctions. The absence of personal contacts with the counterparty, deviations compared to normal course of business, a transaction that appears unusual or seems to lack commercial purpose, should raise a warning flag.



# Competition Law Policy

**Orrön Energy believes in a fair and competitive market and is committed to ensure that business practices fully comply with competition laws.**

**Competition laws aim to protect free competition in the market and prohibit agreements, practices and conduct, which have a damaging effect on competition.**

When interacting with business partners such as customers, suppliers, contractors, joint venture partners and competitors, we ensure that we take into account specific business integrity considerations:

**Arrangements:** Competition laws prohibit any formal or informal arrangement restricting competition. It is sufficient that the agreement or concerted practice has as its effect the prevention, restriction or distortion of competition.

**Price fixing:** It is illegal for competitors to agree the price level at which their products shall be sold to third parties. Market sharing: Competition laws do not allow competitors to allocate territories or customers to each other and/or agree not to compete in certain territories or towards certain customers.

**Joint marketing:** Competition laws do not allow agreements between competitors to jointly sell or distribute the product when such agreements limit freedom to determine individual commercial policy decisions.

**Joint purchasing:** Agreements between competitors when they limit the parties' freedom and/or prevent other suppliers from supplying may be anti-competitive. Collective purchasing may be interpreted as a dominant position of the joint buyers.

**Exchange of information:** It is generally illegal for competing companies to exchange information such as sales quantities, prices, cost structures, trade conditions, or information related to individual customers and/or suppliers.

**Trade Associations:** Trade Associations shall not be used as a forum for illegal collusion between competitors.

## When interacting with our business partners we:

- Use caution and professionalism when communicating, as careless language, although unintentional, can be very damaging to the Company.
- Handle information exchanges with care when communicating with competitors. Exchange of commercially sensitive information is prohibited. However, exchange of information on non-confidential technical and operational issues relevant to the industry is generally permitted.



# Tax Policy

**Orrön Energy contributes to society and local development by respecting tax laws and adopting transparent tax practices.**

**We believe in fair and ethical business practices, including contributing to society through employment and tax payments, and welcome constructive and open engagement with tax authorities.**

We are committed to complying with all applicable laws, regulations and reporting requirements and to pay all taxes due and other public duties in a timely and accurate manner. We do not tolerate facilitation of tax evasion by anyone who acts for us or on our behalf.

This Policy applies to all Company tax matters in all relevant jurisdictions with the aim of ensuring that tax practises comply with laws, regulations, and that income and costs are allocated to appropriate entities in accordance with the OECD Transfer Pricing Guidelines and business rationale.

## Therefore we:

- Respect the arm's length principle as set forth in the OECD Transfer Pricing Guidelines.
- Ensure corporate tax planning is optimised, rational and reasonable.
- Pay taxes in a timely and accurate manner, cooperate with tax authorities and provide information as and when requested.
- Report on taxes and other payments to Governments according to applicable reporting requirements and standards such as IFRS.
- Mitigate the risk for incorrect tax assessments by thoroughly reviewing tax matters, based on internal assessments and guidance from external advisors, as and when required.

## We manage tax risk continuously to minimise exposure by:

- Proactively taking measures to understand and monitor the tax environment, changes to laws and applicable regulations, including the OECD Transfer Pricing Guidelines.
- Continuously assessing risks and potential exposure, as well as mitigating actions and controls that may be implemented.
- Engaging in efficient tax planning that supports business, and reflects commercial and economic activity.
- Reporting identified risks to the Investment Committee, for further reporting to the Board of Directors, as may be required.
- Where possible and appropriate, building a working relationship and openly engaging with the tax authorities to discuss tax assessments, to mitigate the risk of discrepancies, to achieve early certainty where tax law is complex or unclear and to resolve disputes.
- When additional resource or expertise is necessary for verification purposes, on a selective basis, we work collaboratively with external advisors.

# Whistleblowing Policy

**Orrön Energy aims to ensure an open corporate culture with compliance risks identified and managed at an early stage.**

**We are committed to the highest standards of ethical and legal business conduct. In-line with our Code of Conduct and our commitment to open communication, this Policy aims to ensure that regulations and stakeholder expectations concerning whistleblowing in the areas of the Company's operations are respected at all times.**

This Policy aims to ensure protection exists when any individual (internal or external to the Company) reports on suspicions of wrongdoing by or within the Company, and that legitimate concerns regarding misconduct in the workplace are raised without reprisals or victimisation. Whistleblowing protection applies to reports of wrongdoing relating to:

- Breaches of applicable laws or regulations, including tax fraud, corruption, money laundering or public procurement offences, environmental protection, public health and personal data protection.
- Breaches of internal regulations, including the Company's Code of Conduct, policies, procedures and guidelines.
- Unethical or improper conduct.
- Matters that may seriously affect the interests of Orrön Energy or personal health and safety.

## Therefore we:

- Facilitate reporting to the Company by whistleblowers, either directly according to local Company procedures and national law, or in writing to [whistleblowing@orrön.com](mailto:whistleblowing@orrön.com).
- Thoroughly investigate suspected or known concerns and take appropriate action including disciplinary measures.
- Ensure all reports received from a whistleblower are kept in a secure place so that they can be used as evidence where and if appropriate.
- Ensure any reporting made by a whistleblower can be made on an anonymous basis.

## Report on confirmed cases of whistleblowing of material significance to the Board of Directors, subject to the Company's legal obligations regarding personal data protection.

- Protect from repercussions any person who has reported in good faith a genuine whistleblowing concern.
- Protect the confidentiality of the whistleblower's identity, and personal data under the EU General Data Protection Regulation (GDPR).
- Send confirmation of receipt of whistleblowing reports to the whistleblower within seven working days from reception, and inform the whistleblower of any action taken, the status of the internal investigation and its outcome within three months from reception.



[www.orrön.com](http://www.orrön.com)