



## *Preamble*

### **Dear colleagues and co-workers,**

Being one of Austria's largest wind power producers with activities in markets far beyond Austria's borders we are committed to assuming our responsibility for humankind and nature. This implies compliance with any and all applicable laws, respect of fundamental ethical values and sustainability in our actions, fully in accordance with our mission:

***Wind power is our driving force. We create values for people and the environment.***

The aim of our Windkraft Simonsfeld (WKS) Code of Conduct is to lay down the most basic principles and rules of business conduct for our fellow staff members and co-workers in Austria and abroad and to highlight that

- 1) our fellow colleagues and co-workers are our most precious asset,**
- 2) we meet our partners and clients at eye level,**
- 3) as a result, they see a difference in us, and**
- 4) the wider public recognises the added value and trusts us.**

We wish you all the best implementing this Code of Conduct, so as to further and promote the energy revolution as successfully as in the past.

**Markus Winter**  
Chief Technology Officer

**Alexander Hochauer**  
Chief Financial Officer





## Windkraft Simonsfeld Code of Conduct in a Nutshell



### **Social & Ecological Responsibility**

- > Corporate Social Responsibility
- > Occupational Safety and Health



### **Competition**

- > Conflicts of Interests
- > Fair Competition



### **Finances**

- > Money Laundering and Tax Evasion
- > Corruption
- > Gifts, Endowments and Donations,...



### **Fair & Respectful Conduct**

- > Our Fellow Colleagues and Co-Workers
- > Our Stakeholders



### **Transparency & Confidentiality**

- > Non-Disclosure and Insider Information
- > Transparency
- > Confidentiality and Data Protection



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## **Social & Ecological Responsibility**

### **Corporate Social Responsibility**

We treat natural resources in a responsible and sustainable manner and raise awareness even beyond Windkraft Simonsfeld.

### **Occupational Safety and Health**

We avoid any risks to humankind and the environment and support occupational safety and a sense of well-being at work.



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## **Competition**

### **Conflicts of Interest**

We have committed ourselves to fully disclose any current or potential conflicts of interests immediately.

### **Fair competition**

We fully embrace the principles fair competition.



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## **Finances**

### **Money Laundering and Tax Evasion**

We comply with all laws preventing money laundering and financial crime.

### **Corruption**

We undertake to do our best to avoid corruption within our scope of influence.

### **Gifts, Endowments and Donations,...**

We do not offer any sort of advantage or gift which might be deemed an illegal instrument of exerting influence or which might seem like it.



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## **Fair & Respectful Conduct**

### **Our Fellow Colleagues and Co-workers**

We embrace respectful treatment, responsible management and short decision-making paths.

### **Our Stakeholders**

We treat our partners, clients, authorities, interested parties and investors in a respectful, straightforward, and reliable way as well as with a sense of communality. We respect the communities and cultures, in which we do projects; we learn from them and support them.



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## **Transparency & Confidentiality**

### **Non-Disclosure and Insider Information**

We protect business secrets of Windkraft Simonsfeld and our business partners against any form of non-authorised disclosure. We are also committed to not to infringe any interdictions concerning the use of insider information for one's or personal gain or for the benefit of others.

### **Transparency**

We are committed to respecting transparency criteria for security transactions carried out by our managers.

### **Confidentiality and Data Protection**

We ensure that applicable data protection laws are respected and also protect personal data.



# Structure and Application of our Code of Conduct

Our Code of Conduct (CoC) builds on the Corporate Sustainability Roadmap of Windkraft Simonsfeld. It applies to the entire Windkraft Simonsfeld Group, i.e. Windkraft Simonsfeld AG and all its affiliates (hereinafter “WKS”).<sup>1</sup>

The applicable laws and legal stipulations constitute the basis for all our actions within WKS. Any breaches, infringements or violations are not compatible with our values, for they may harm our reputation and might entail severe legal consequences. Not only have we set the bar far higher than what is required by law, but we want to incorporate social, environmental and economic responsibility and due diligence into all our actions.

This Code of Conduct is complemented by internal instructions and further directives (see WKS Manual of Organisation and Procedures [MOP]) on selected issues as well as by the overarching legal framework in force, and it must be considered when adopting or amending any internal directives. Insofar as more specific instructions, standards or stipulations exist, they will not be curtailed by this Code of Conduct.

WKS supports, without exception, the implementation, respect and promotion of this Code of Conduct by its staff members; it also offers specialised trainings in this regard. In principle, every WKS staff member is personally responsible for their compliance with and application of this Code of Conduct, whereby our managers are expected not only to act as role models and to supervise compliance with of this Code, but also to offer training and advice if needed. This Code of Conduct shall be applied using common sense and sound judgment. In particular, we ask you to always bear in mind the following questions

- > **Is it ethical to do this?**
- > **Is it legal to do this?**
- > **Does it reflect our aims, strategy and vision?**
- > **Would you/I be fine with reading about it in public media (the newspaper)?**



**This Code of Conduct is available in German and English and can be downloaded from our website or the WKS Intranet.**

<sup>1</sup> This CoC applies to everybody working for WKS, i.e. we reserve the right to extend it to third parties acting on behalf of WKS.





## Social & Ecological Responsibility

### Corporate Social Responsibility

Our Corporate Sustainability Roadmap builds on the UN's Agenda 2030 and its Global Sustainable Development Goals. Furthermore, it comprises our commitment to social, ecological and economic responsibility, even far beyond the law.

Stable economic growth with maximum social and economic benefit is at the heart of our corporate activities. In this regard, we try to reduce our ecological footprint to a minimum, and we always give maximum priority to the more ecological solution (business trips, material/procurement, car pooling...).

We also seek continuous quality enhancement regarding our processes, environmental sustainability and social acceptance and we embrace any paradigm change in thinking and behaviour which is required in this regard.

In accordance with our corporate attitude we do not only speak out against non-sustainable forms of energy production and push the energy revolution, but we assume responsibility for our society and the environment in a proactive way by participating in the decision-making processes regarding the Austrian legal energy framework and by participating in Renewable Energy (RE) projects.

In addition, we act in a politically neutral, impartial way, not granting any donations or endowances to any political parties or to any associations related to them.

### Occupational Safety and Health

WKS seeks to offer maximum safety at work and, in addition, we support preventive healthcare. We design and select our processes, workspace and tools carefully, going beyond statutory provisions on occupational safety, health and fire prevention (e.g. reflected choice of office and work equipment). In return, WKS asks you to respect these standards, to use high-quality material carefully and to respect safety rules without restriction.





## Competition

### Conflicts of Interest

While working for WKS your personal or economic interests may, at some point, (directly or indirectly through close persons or companies) conflict with WKS' interests. You must notify your superior immediately, in full and without prior request, if a conflict of interests occurs, whether it is real or a potential one even if there is only the slightest chance of a conflict. Also, you might have to seek a special permit for your project.

All kinds of secondary job or activity, which are designed for profit, whether they are carried out on a self-employed or employed basis, require the prior written approval by WKS. You must also notify WKS of any business activities of yours or regarding any direct or indirect participation in businesses, which compete with WKS in part or in full or which are business partners to WKS. Conflicts of interests may also arise if any of your family members or relatives<sup>2</sup> runs or participates in a business which competes with WKS in part or in full. Therefore, any such activities must also be reported if they might entail a conflict of interest.

### Fair Competition

WKS' business policy is centred around fair competition. Any disrespect of competition and antitrust laws might entail severe consequences for WKS and is not in line with our corporate philosophy. We procure services and goods in conformity with our internal Procurement Directive, upholding the principles of free and fair competition as well as non-discrimination and equal treatment of suppliers and service providers.

We only award contracts or place orders if there is an adequate balance regarding the quality of the service and the price.

Any agreements which might be fit to restrict competition are prohibited. This comprises all kinds of agreements – be it in written or oral form – that may distort or influence competition in any way which might exert pressure on intermediaries or which might be deemed to be fake bids.

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<sup>2</sup> Relatives mean married or registered partners, dependent children and other persons who have been living in the same house for the last 12 months or longer at the time the conflict of interest arises. This also applies to legal persons and fiduciaries or trusts if there is a close relationship between them and the above-mentioned groups of persons.





## Finances

### Money Laundering & Tax Evasion

Money laundering is the general term used to describe the process by which the original ownership and control of the proceeds of criminal conduct are disguised by making such proceeds appear to have derived from a legitimate source.

We firmly underline that we comply with any and all laws preventing, unveiling and reporting activities of money laundering and we only enter into any business with clients that – to our knowledge – work in a lawful way using legitimate financial means.

Furthermore, we will not support any form of tax evasion, neither directly in our work nor through third party cooperation.

### Corruption

“Corruption is the abuse of entrusted power for private gain,” (Transparency International 2019). We will make every effort to prevent corruption within our scope of influence.

Legal compliance and respect towards officials and public authorities is what we have committed ourselves to. Under no circumstances may any of our co-workers therefore claim, accept, procure, or even let themselves be promised any advantage for themselves or third parties as a result of their position if they are not legally entitled to it (“bribery in business dealings”).

Consequently, we must not give or accept any offering which might be deemed to be an attempt of exerting influence, either.





## Gifts, Endowments and Donations,...

By gifts, endowments, donations, etc. we understand the practice of offering or accepting gifts, loans or bonuses, rewards or any other advantage to a person for their advantage or the advantage of their family members or any third persons. They are prohibited if they are deemed to be an incentive to do something that is deemed unrighteous or illegal or that implies a breach of trust.

Therefore, we must not give or accept any sort of advantage or gift, which might exceed our de minimis criteria. Small corporate gifts, which are of minor economic value and are deemed culturally and locally appropriate as well as practices which are part of socially accepted norms (i.e. acts or symbols of hospitality, appreciation, and marketing gifts), are tolerable, though. Gifts or offerings that would pass that line must be rejected or given back, however. Also, you must notify your superior.

It always depends on the individual case whether a financial allocation is deemed as small or not. You must inform your superior and the Compliance Officer at any rate if it exceeds EUR 100,00 and is made by or directed at one and the same party. This applies in any case, whether it is a one-time allocation or divided in several parts.

Please note that sponsoring, promotional or similar activities are not prohibited per se; however, any such activity must be proportionate and in line with our corporate values. In particular, the value of any PR sponsoring must be commensurate with their counterpart.

Also, don't forget that our Payment Authorisation Directive (as amended) must be complied with.





## Respectful Treatment

### Our Fellow Colleagues and Co-Workers

We grant each and everyone working for WKS – be it here in Austria or abroad – the same opportunities, irrespective of their age, sex, religion, sexual orientation and origin. We also offer our staff members fair and equal pay for the same work. Performance, potential, commitment and motivation are the main criteria for your personal further development, regardless of any other issues (such as the ones mentioned above, but also the scope and distribution of work hours (e.g. part-time vs. full-time)). It is not only understood for WKS to respect local labour and social laws, but we deliberately go one step further. Being an employer who treats its staff members with respect and in a fair manner, we expect you to act respectfully as well. We do not tolerate any form of discrimination, racism or harassment.

We explicitly ask you to notify your superior or a person of trust within the company immediately should there be any situation where you get personally hurt or tasked with something that contradicts your basic ethic values (e.g. religion, wording, sexuality, political comments).

### Our Stakeholders

Corporate communication is important to us. We want it to be of high quality and to inform our investors of all main activities and developments, which are of economic, social or environmental relevance regularly, in time and in the most transparent way possible.

Only the Board of Executives and the Board of Managers may communicate with representatives from the media, our investors, our Supervisory Board or regulatory authorities.

We treat our partners, clients, authorities, interested parties and investors in a respectful, straightforward, and reliable way as well as with a sense of communality. Trustworthiness and reliability are key factors accounting for our success. Striving for long-term cooperation we treat our partners the way we want to be treated by them.

We respect the communities and cultures, in which we do projects; we learn from them and support them: Being aware of our impact in the region we provide the locals with the opportunity to be an active part of the energy revolution.





## Transparency & Confidentiality

### Non-Disclosure & Insider Information

Our co-workers and colleagues may gain insight into operational or financial data of our company as part of their job. In particular, this includes information about major changes in operational activities, acquisitions, important staff changes or financial issues. This along with other key information about the company and its business partners is deemed to be confidential information insofar as it has not been made public, and it is vital for WKS' success. Such business-critical or sensitive information may only be used internally and in accordance with our internal rules. It must not be communicated externally, including to family members (e.g. partners) – i.e. it must not be used or abused for your personal benefit or for the benefit of third parties. This also applies for business practices or secrets of WKS' business partners. All fellow staff members and bodies of WKS are, therefore, obliged to prevent the disclosure of confidential information (be it orally, electronically or in writing) outside of WKS; e.g. by unauthorised dissemination of sensitive, business-critical information to third parties through dialogue or the internet.

In this regard, please consult WKS' rules, regulations and directives, and especially your contract with WKS. As laid down in there, non-disclosure provisions will remain valid even after you have left the company. In case documents/information are lost or stolen, or in case of unintended submission of documents to external persons, notify your superior immediately.

The same applies to insider information or directors' dealings, which are, basically, a sub-category of confidential information. Information is regarded to be insider information if it is confidential, business-critical and used or communicated in a way as to influence trade.

WKS supervisory board members, board members, staff and relatives<sup>3</sup> are not allowed to participate in any transactions within 30 days prior to the publication of WKS' annual statements or half-year accounts so that they may not use or profit from any insider information for their personal advantage or create the impression to do so (except for new issues). They are not allowed to place or buy any shares on the WKS trading platform during this period of time.

<sup>3</sup> Relatives mean married or registered partners, dependent children and other persons who have been living in the same house for the last 12 months or longer at the time the conflict of interest arises. This also applies to legal persons and fiduciaries or trusts if there is a close relationship between them and the above-mentioned groups of persons.



## Transparency and Director's Dealings

WKS regards itself as a transparent company, communicating in an open way. Therefore, it has committed itself to respecting transparency criteria for security transactions carried out by its managers.

Transactions of shares or bonds issued by Windkraft Simonsfeld AG, which are traded by the board of managers, the members of its supervisory board or its executive staff and relatives<sup>4</sup>, will be published on WKS' website<sup>5</sup>. This information will be published for at least three months.

They are obligated to notify us about any transaction regarding WKS shares or bonds immediately after dealing with them. Publication is only possible if we are aware of a transaction and notified thereof in accordance with the Terms of Use of our trading platform (Point 17) and our Code of Conduct.

## Confidentiality and Data Protection

Respect for our staff's individual privacy includes the protection of their personal data. WKS pays particular attention to ensure that applicable data protection laws are respected and requires the same from its staff.

We also protect all confidential and business information of our partners, which are disclosed to us, against loss and spying in a professional way. They may only be passed on internally or externally in accordance with the legal framework in force.

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<sup>4</sup> Relatives mean married or registered partners, dependent children and other persons who have been living in the same house for the last 12 months or longer at the time the conflict of interest arises. This also applies to legal persons and fiduciaries or trusts if there is a close relationship between them and the above-mentioned groups of persons.

<sup>5</sup> [www.wksimonsfeld.at/landingpages/transparenz](http://www.wksimonsfeld.at/landingpages/transparenz)



# Internal Rules to Ensure Respect of this Code of Conduct, Laws and Other External and Internal Rules

It is incumbent upon you to adhere by the rules laid down in this Code of Conduct, as well as with the laws and internal guidelines that apply to your field of activities. The applicable laws and statutory provisions as well as Group directives must be complied with rigorously.

You must inform yourself about the laws and rules in place which touch your field of activities.

## Contact, Suggestions, Questions and Reporting of Any Breaches

Any observations of non-compliance with this Code of Conduct must be reported to the Compliance Officer immediately. The latter will also be your point of contact besides your superior if you have any questions on compliance matters or with regard to this Code.

We want to promote an open and trustful communication culture. Therefore, we want to highlight that any staff reporting such a breach, infringement or event of non-compliance regarding any laws, this Code of Conduct or the like will not face any negative consequences whatsoever. This also applies to other persons who report information to us which may be vital for the investigation.

## Miscellaneous

The Compliance Officer will amend, modify and further develop this Code of Conduct in collaboration with the Board of Management. Modifications and amendments may only be made in writing, following prior approval by the Board of Managers.

This Code of Conduct enters into force on 13.11.2023. It replaces any and all previous versions.



