




# Code of Conduct

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## Confidentiality classification

Classification level	How to handle information sharing
NON-BUSINESS	Not corporate related information.
 PUBLIC	The information carries no confidentiality risk and can be shared.
RESTRICTED	The information should only be shared on a need-to-know basis. No NDA is required.
CONFIDENTIAL	The information should only be shared on an organizational or team need-to-know basis. An NDA is required.
STRICTLY CONFIDENTIAL	The information should only be shared on a personal need-to-know basis. An NDA is required.

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# Code of Conduct

## Management Commitment



- At PEAK Wind, our mission is to deliver **best-in-class advisory services** to the renewable energy industry supporting the global transition towards sustainable energy sources.
- We are guided by our values of Expertise, Passion, Integrity, and Unity & Team, in how we interact with our stakeholders. These values underpin the efforts we need to make and the actions we need to take to deliver as a company.
- Our Code of Professional Conduct (“**Code of Conduct**”) is a set of rules and principles for how we want to act and behave as a global company.
- We require all PEAK Wind entities and employees worldwide to operate according to the law and within the frame of the Code of Conduct. While we recognise that many customs differ from one country to the next, we expect that any PEAK Wind employee will adhere to the rules and principles and conduct business with respect and integrity.
- We require all vendors, suppliers, and contractors working with PEAK Wind to adhere to the principles and requirements outlined in our Code of Conduct. To ensure compliance, we are committed to implementing an audit program for vendors that aligns with reasonable and customary practices within the industry. We encourage all our clients to adopt similar policies, fostering a shared commitment to ethical business practices, integrity, and sustainability across our industry.
- PEAK Wind’s management is committed to and responsible for ensuring that the appropriate policies and guidelines are in place to give effect to the Code of Conduct. PEAK Wind mandates awareness training of the Code of Conduct for all employees. It is the responsibility of each employee to make sure they understand the Code of Conduct and the relevant policies and guidelines.

# Code of Conduct

## *Compliance with Applicable Laws & Regulations*



All employees must comply with the laws and regulations of the legal system in which they are operating, in addition to PEAK Wind's Code of Conduct and applicable policies and guidelines.

### **Health & safety in the workplace**

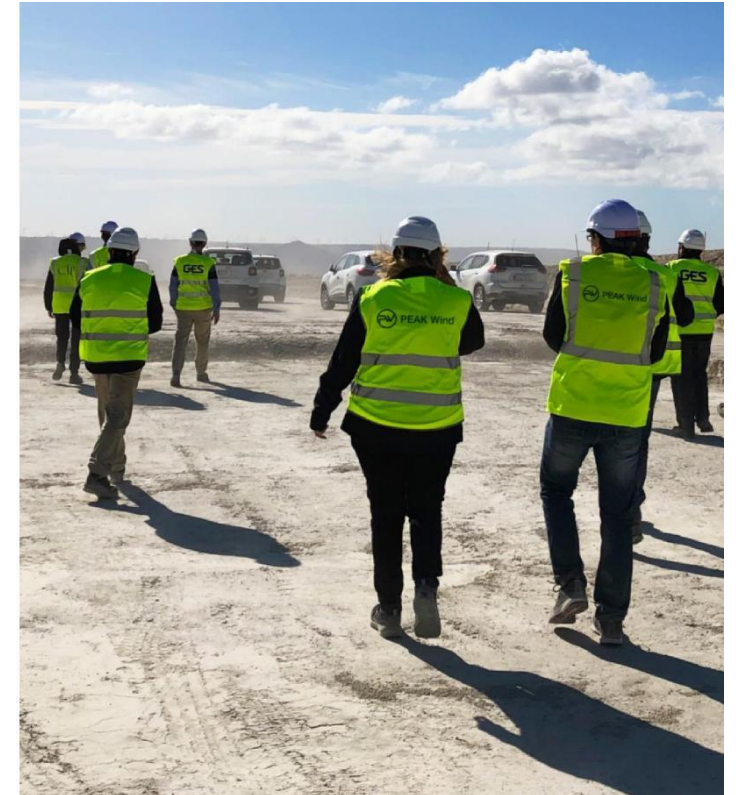
PEAK Wind endeavours to create safe and thriving workplaces with enriched and injury free people, whilst complying with high standards of health, safety, environmental, and quality (HSEQ). We strive for ensuring:

- High standards of health, safety, and required quality.
- Low environmental impacts and resource consumption.
- Proactive risk management to as low as reasonably practicable levels,
- All our employees are competent, motivated, and knowledgeable of HSEQ standards.
- An open, trustful, collaborative, and accountable work culture.
- Promotion of best practices and proactive HSEQ activities towards stakeholders.
- Continuous improvement and learning.

Compliance with PEAK Wind HSEQ Policy is always mandatory.

### **Human rights / Labour Rights**

PEAK Wind is strongly committed to human rights and employees' rights as stated in the [International Bill of Human Rights](#) and the [eight core conventions](#) of the [International Labour Organisation](#).





# Code of Conduct

*PEAK Wind Promise: Employment Standards and Commitments*



PEAK Wind will ensure that, throughout our operations:

- Compulsory or forced labour is not used.
- Child labour is not employed.
- Human trafficking is strictly prohibited.
- Applicable laws, industry standards and relevant collective agreements on wages, working hours, breaks, and public holidays are fully complied with.
- Freedom of association and the right for employees to be represented by a trade union for collective bargaining is respected.
- All employees are informed of the basic terms and conditions of their employment.

# Code of Conduct

*Fostering a Safe, Inclusive, and Respectful Workplace*



PEAK Wind respects the personal dignity, privacy, and rights of every individual. PEAK Wind's culture is a shared culture of inclusion and mutual trust. We expect our employees to treat each other with dignity and respect, fostering an inclusive and professional work environment free from bias, prejudice, or unfair treatment.

## **Non-Discrimination and Equal Opportunity**

We are committed to treating all employees in a non-discriminatory manner and with dignity and respect, regardless of race, colour, religion, political conviction, gender, age, national origin, sexual orientation, gender, marital status or disability, or any other characteristic protected by applicable law. We are committed to promoting diversity, equity, and inclusion.

## **Harassment-Free Workplace.**

We are committed to providing a work environment free from any kind of harassment including, but not limited to, sexual harassment and harassment in any form based on race, colour, national origin, citizenship status, religion, gender, gender identity, gender expression, sexual orientation, age, marital status, veteran status, disability, genetic makeup, or any other bases protected by applicable law.

Sexual harassment includes any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, with the purpose or effect of violating the dignity of the person. Sexual harassment may include touching, remarks, looks, attitudes, jokes, or the use of sexually oriented language, allusions to a person's private life, reference to sexual orientation, innuendos with a sexual connotation, remarks about dress or figure, or the persistent leering at a person or a part of his or her body.

This commitment aligns with the definitions set out in the [International Labor Organization \(ILO\) Convention 190](#).

## **Promoting Integrity and Positive Workplace Conduct.**

PEAK Wind does not tolerate employee misconduct that jeopardises the safety, well-being, or integrity of the workplace. Acts of dishonesty, theft, misappropriation of funds, violence, or other misconduct, such as intimidation, threats, or bullying, are strictly prohibited. Employees are expected to uphold the company's values of mutual respect and collaboration.

# Code of Conduct

## *Respect for Personal Data & Privacy*



PEAK Wind is committed to respecting the individuality of its employees, including their personal data and thus privacy.

PEAK Wind will therefore:

- Ensure that security policies and procedures are in place to protect and prevent the unauthorised disclosure of confidential information and personal data.
- Acquire or retain employee's personal data only to the extent that collection is necessary and is relevant to the employee's work at PEAK Wind, or to the extent that is required by applicable law.
- Ensure that data is kept up to date and accurate and is retained no longer than necessary. Data will be reviewed and purged at regular intervals to ensure that personal data is not unnecessarily retained.
- Make sure that access to personal data is limited to company personnel who have appropriate authorisation and a clear business need for that information.
- Maintain documentation that its data collection and retention complies with this policy.
- Comply with GDPR and other applicable data privacy laws.

# Code of Conduct

## *Zero Tolerance for Bribery & Corruption*



### Anti-Corruption

PEAK Wind is committed to adhering to the principles of the [United Nations Convention Against Corruption \(UNCAC\)](#). This includes:

- Preventing and combatting corruption in all its forms, including bribery, embezzlement, and abuse of power.
- Promoting transparency, accountability, and ethical conduct in all business operations.
- Establishing policies and controls to detect, report, and prevent corrupt practices.
- Requiring all employees, contractors, and partners to comply with these principles to uphold the highest standards of integrity in every interaction.

### Bribery

PEAK Wind does not condone, engage in, or support bribery in any form. PEAK Wind employees, and any person or entity acting on behalf of PEAK Wind, must not offer, promise, or give, nor request or accept, any undue advantage, whether directly or indirectly (i.e. through a third party), with the intention to obtain, retain, or direct business or to secure any other improper advantage in the conduct of business.

### Facilitation Payments

PEAK Wind does not permit facilitation payments. Under exceptional circumstances, such as where life, limb, or liberty is at threat, facilitation payments may be made but must be reported to management and recorded.

### Gifts & Business Entertainment

Gifts and business entertainment are tokens of gratitude in business relations: they must be legal, modest in value, appropriate, and proportionate. PEAK Wind prohibits the offer or receipt of gifts and business entertainment whenever such arrangements could affect or be perceived to affect the outcome of the business transaction.

### Conflicts of Interest

PEAK Wind employees must conduct business activities in the best interests of the company and avoid allowing personal interests to conflict with their obligations as trusted employees. Potential conflicts of interest should be disclosed internally.

### Government & Political Interaction

PEAK Wind will not make contributions or payments or otherwise give any endorsement to political parties or committees or to individual politicians. However, PEAK Wind may engage with governments and politicians to promote PEAK Wind's legitimate interests in international, national, and local debates on energy and renewables in a legal, ethical, and transparent manner.



# Code of Conduct

## Environmental Responsibility



PEAK Wind supports the **precautionary approach** to environmental challenges.

PEAK Wind is committed to:

- Delivering best-in-class advisory services within the field of renewable energy for the benefit of the global energy transition, which is to the benefit of our own and future generations.
- Constantly generating new knowledge and insights that contribute to the transition to a low-carbon economy.
- Encouraging our clients and stakeholders to evaluate the environmental performance of their activities and striving to always utilise the opportunities to improve our own performance and promote greater environmental responsibility.
- Complying with all applicable environmental laws.

# Code of Conduct

*Protecting Company Assets, Information & Reputation*



## Fraud, Financial Reporting & Transactions

PEAK Wind employees must not engage in or support any type of fraud. Employees must carry out all company financial reporting, disclosure, and transactions in the best interests of PEAK Wind and uphold PEAK Wind's reputation as a responsible and accountable company. All financial transactions must be adequately identified and fairly recorded in appropriate records.

## Disclosure

Confidentiality should always be maintained while dealing with sensitive information relating to PEAK Wind, its clients, and client-related projects.

## Insider Trading

PEAK Wind employees must not engage in insider trading, which involves acting on or sharing confidential, price-sensitive information about a company before it is publicly disclosed. This can encompass a broad range of activities, from trading stocks to tipping off others. It is essential to strictly limit access to insider information to those with a legitimate need to know. Misuse or careless handling of such information can lead to severe legal consequences, including fines and imprisonment.

## Intellectual Property

PEAK Wind employees must protect PEAK Wind and client intellectual property and must respect the intellectual property of other stakeholders. Disclosure or use of PEAK Wind intellectual property outside of PEAK Wind without prior proper protection can lead to the loss of valuable PEAK Wind or client assets as well as restrict PEAK Wind's freedom to operate.



# Code of Conduct

## *Protection of Confidential Information*



### Protection of Confidential Information

The renewable energy sector is knowledge intensive and critical, meaning that protection of documents and data is taken very seriously. At PEAK Wind, we consider all material within our servers to be proprietary and confidential unless explicitly marked for public disclosure. Any unauthorised extraction, mishandling, or dissemination of PEAK Wind data can lead to legal action by PEAK Wind and our clients.

### Transferring Company Data Prohibited

PEAK Wind employees may only download data from company servers to company laptops or phones for legitimate work-related activities. Any transfer of company data to personal devices or external storage solutions is strictly prohibited without explicit, authorised consent. Likewise, PEAK Wind employees should not use or store on PEAK Wind servers any confidential data obtained from prior employments or assignments unrelated to work at PEAK Wind.

### Storage and Sharing of Client Confidential Information

All confidential client data should be stored separately from other data and access strictly limited to those who have work-related reasons to review the data. Client data is typically protected by individual NDAs. Prior to disclosing confidential data to any external party, it is mandatory to obtain the client's written consent to ensure appropriate authorisations are in place.

### PEAK Wind takes proactive measures to protect proprietary and client data:

- Active monitoring and logging of SharePoint to identify downloads or transfers of data by employees.
- Remote shut down of laptops where unauthorised access or downloading is identified.
- Technological and behavioural controls to protect data from unauthorised access.
- Zero tolerance for violations, including immediate termination and civil and criminal actions for intentional theft of PEAK Wind or client data.



# Code of Conduct

## Reporting Potential Concerns



PEAK Wind is committed to creating an environment where all employees are encouraged to report violations or suspected violations of the Code of Conduct or any situations that may cause PEAK Wind to fall short of meeting its high standards.

- We expect that our employees will disclose any instances of violations they become aware of, whether they are directly involved, witness an incident, or otherwise learn about a potential violation.
- No employee will suffer retaliation or discriminatory or disciplinary action for reporting in good faith violations or suspected violations of the Code of Conduct.
- Any concerns should be reported
  - By employees through our [Reporting Portal](#)
  - By emailing our [ethics team](#)
  - By submitting [anonymous reports](#)
- All reports will be handled directly by PEAK Wind Legal Counsel and the Head of People and Development.



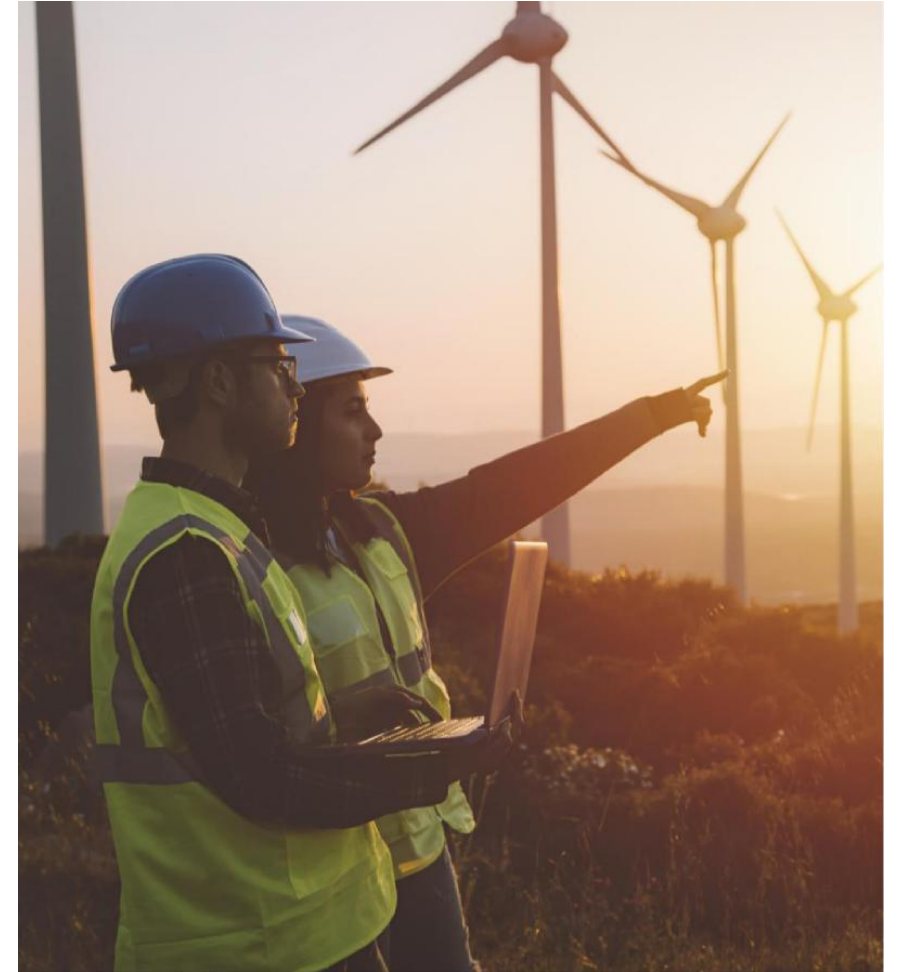
# Code of Conduct

## *PEAK Wind Commitments: Investigation & Remediation*



PEAK Wind commits to:

- Promptly investigate any allegations of violation of the Code of Conduct, in a fair process conducted by a neutral investigator.
- Treat all complaints of violation seriously and respect confidentiality. Anonymity will be guaranteed if the reporter wishes not to disclose their identity and anonymous reports will be taken seriously.
- Discipline persons found to have violated the Code of Conduct, up to and including dismissal from employment, in a manner that is fair, consistent, and proportionate to the violation.
- Ensure that no one will face retaliation for making a complaint. Good faith reports of potential violations, even if ultimately unfounded, will not result in any adverse consequences for the reporter, such as a reduction in responsibilities, reassignment, or a negative impact on their work environment. Any act of retaliation against employees who report behavior is itself a violation of the Code of Conduct.



# Code of Conduct

## Version History



Version	Approval Date / Published Date	Initials	Changes
1	1 June 2021	WHD	Initial versions published
2	31 December 2022	WHD	Annual Review
3	12 September 2023	WHD	Added anonymous reporting and took EM out of the investigation process, aligned with new law
4	24 April 2025	WHD	Updates to harassment policy, adding in recommended sanctions, adding in corruption & human trafficking; other drafting changes.



# Thank you

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*Find out more at [peak-wind.com](https://peak-wind.com)*