



Employee code of conduct

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INTRODUCTION

We work in the wind industry because we believe in its transformative power. We challenge those around us to take action to transform and improve things, with a new perspective, a new way of living as a society.

We as a company have set ourselves ambitious goals, based on strong values. These values must guide us in our objectives of guaranteeing a responsible management of our business, long-term sustainability, and value creation for all our stakeholders. Our core values, serve as the foundation of our conduct and decision-making in our day-to-day work.

We know what matters to you. We consider *empathy* as a key standpoint in all our activities. Empathy applied to business also means *insight* to understand the real needs and goals in every project. It requires a deep technical knowledge and *commitment* to always offer the best solutions.

With you all the way. *Trustworthiness* and *Accountability* are essential in any long-term relationship, and that is how we understand the relations we have in our day-to-day work. We aim to be and to remain a *reliable* partner all along the way.

Sharing is better. Sharing knowledge in a *collaborative environment* is crucial for the success of every partnership. *Honesty* and *Dissemination of the results* must be a core part of all our professional collaborations, with our colleagues, customers and stakeholders.

These values give us a clear image of what our guiding principles should be. However, there might be more specific situations in our day to day activities in which we may need more explicit guidance. This is why we have developed this Employee Code of Conduct.

It summarizes the basic legal and ethical standards that must guide our actions and decisions, and provides practical advice on how to conduct ourselves in different situations. It also explains where to find the appropriate support and guidance.

This Code of Conduct sets out our fundamental principles, standards and conduct that enable us to successfully pursue our mission, and promote our values. We must live by our ethical principles, applying them wherever we operate. Let's make this code of conduct a crucial part of our corporate identity.



Raúl Cortés

CEO

EMPLOYEE RIGHTS & WORKPLACE

Health and Safe workplace



What you should know

We strive to make the work environment in all our locations safe and secure. We want all the work to be conducted in such a way that injuries and illnesses are prevented in every Aerox location. Making the workplace safe includes providing instructions, procedures, training, and supervision to ensure a safe working environment.

Personal Protective Equipment (PPE) is provided when needed, and every employee has the obligation to use them as instructed.

We strive for systematic reporting and assessment of any unsafe conditions and incidents as part of our safety culture.



What you should do

- Follow safety instructions at the workplace.
- Stop any potentially unsafe work.
- Report any incident in which you are involved.

Diversity and inclusion



What you should know

We believe in diversity and inclusion. That is why we provide equal opportunities to all our employees regardless of gender identity, age, nationality, religion, ethnicity, or other similar characteristics. Employees are selected and employed based on their professional skills and competence.

When recruiting employees, we are committed to equal and proper treatment of all job applicants and employees.



What you should do

- Treat each other with integrity and be respectful of your cultural differences.
- Report if you notice discriminatory treatment, bullying or harassment of any kind at work.

Human & Labor rights



What you should know

We reject all forms of child or forced labor. This applies to both our workplaces and our business partners'. We provide employees with fair pay for their work, as well as work breaks and paid holidays according to local laws.

We respect freedom of association and recognize the right of Aerox's employees to become members of unions in accordance with the laws and principles of each respective country.



What you should do

- Respect the terms of your contract.
- Be Alert and report any suspicion of a violation of the labour rights listed above, not only at Aerox's sites but also at our business partners.

Intellectual property rights



What you should know

Confidential information and data, including technical, business and legal information and trade secrets, are important assets for Aerox. This type of information is protected in the same way as physical goods.

Furthermore, we respect and ensure the confidentiality of information and data of our business partners.



What you should do

- Do not disclose Aerox's intellectual property and confidential information to unauthorized third parties unless it is protected by a non-disclosure agreement (NDA) or other similar duty of confidentiality.
- This provision continues to apply without restriction after the termination of any employment relationship with Aerox.



INTEGRITY DOING BUSINESS

Fair competition



What you should know

We base our business in the principle of free, open and fair competition. We do not participate in any unlawful collaboration, such as price fixing, market sharing, output limitation, bid-rigging with competitors, customers or suppliers that limits or alters competition.



What you should do

- Do not enter into agreements, written or otherwise, with competitors on pricing, or not to compete, or to share markets or customers.
- Do not share or obtain information with competitors and stop any discussion or participation at a meeting in which information-sharing between competitors is suggested.
- Report any potentially anti-competitive practices or behavior to your supervisor.

Gifts and entertainment



What you should know

We do not offer, request, or receive gifts or compensations, with the purpose of influencing or gaining business-related benefits.

It is acceptable to receive gifts and hospitality that are legal, reasonable, and proportionate and are intended only to build a business relationship based on normal courtesy. Acceptable spend limits may differ from country to country and you should consider the limits in your country and business area.



What you should do

- Do not spend more than 150 € per person in one gift or event.
- Do not accept gifts or hospitality from supplier with a value over 150 €.
- In case you receive gifts or business entertainment above this value, report to your supervisor.

Bribery



What you should know

We do not tolerate any form of corruption, such as extortion, bribery, conflict of interest, fraud, and money laundering. Our employees must not request or accept any form of undue payment or other compensation, given for the purpose of business promotion.



What you should do

- Do not accept any form of bribe for personal use or benefit from suppliers.
- Do not pay cash or equivalents to gain an unfair advantage or to influence the behavior of a public official or any business partner.
- Report any suspected bribes or requests for bribes to your supervisor.

Product safety



What you should know

We strive to formulate products with the lowest possible hazard profile. We do this by combining the understanding of customer needs, regulatory compliance and commitment to the manufacture of durable products with an effort to minimize the total impact on health & safety and the environment at all stages of the product lifecycle.



What you should do

- Look for ways to minimize the hazard profile of our products, and suggest changes to improve product safety if you see an opportunity to improve.



SUSTAINABILITY

Environment



What you should know

We are committed to environmental protection and work to reduce the environmental impact of our operations. We promote the use of safer materials and work to reduce their environmental impact.

We are committed to transparent communication on our sustainability performance in our reports for investors.



What you should do

- Suggest ways to reduce waste, and environmental impact if you see an opportunity to improve.
- Make sure you comply with applicable environmental legislation.
- Report if you are aware or notice any deviation with the applicable environmental legislation.



VIOLATIONS AGAINST THIS CODE OF CONDUCT

Report violations



What you should know

We strive to ensure that our employees adhere to the relevant principles of this Code of Conduct. This Code of Conduct is a practical document, setting out our principles and what they mean for us as a company, and you as an employee.



What you should do

- Read, familiarize yourself with and understand the Code. If you are unsure or have questions, seek advice from your supervisor or line manager, or contact the [Ethics & Compliance hotline](#) on Aerox's intranet for guidance.
- Demonstrate, through your words and actions, your commitment to integrity, ethics, compliance, transparency, honesty, respect and care for the environment, always acting in a safe, ethical, professional and responsible manner. Let your actions speak for you.



How to report

All our employees have the right and the duty to report any violation of this code, fraud or other criminal behavior to their line management as promptly as possible in any of the following manners:

- By notifying your supervisor or line manager, so that the person in charge of your area can immediately submit the information to the Executive Committee.
- By contacting the [Ethics & Compliance hotline](#) on Aerox's intranet to report anonymously.



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