



02.02.00 Code of Conduct

This Code of Conduct policy outlines Global Wind Service (GWS) expectations, integrity and transparency regarding our operations. It applies to all employees, and all hired personnel, consultants and other who act on behalf of GWS.

Overall, our commitment is.

- All work shall be conducted in compliance with laws, rules and regulations and follow the procedures and work instructions created to ensure a safe and good working environment.
- No form of discrimination is acceptable. This includes but not limited to, gender, age, ethnic original, nationality, disability, sexual orientation, religion, or political opinion.
- We do not accept the use of child labour or modern slavery and we shall contribute to the elimination of all forms of forced or compulsory labour.
- We do not accept any form of corruption and shall not offer or accept bribes or other inappropriate gifts or benefits to achieve business or personal advantages.
- We respect the fundamental employment rights.
- We promote freedom of expression and open communication.
- Written, verbal and online communication always happens in a respectful way.
- All employees and partners have the right to be part of any peaceful organisations.
- All employees have the obligation to report, mitigate and avoid conflict of interests' case based on their position within the company. Everyone is to seek prior approval, when possible, conflict of interest cases arises.
- We do not accept any use of insider information for personal gain.
- We shall not prevent or discourage employees from associating freely with any lawful workers' association or collective bargaining association of their choice.
- We expect all our employees and suppliers to exercise good judgment in ethical dilemmas, and to report any incidents, hazards, risks, opportunities, or concerns they may have or become aware of
- We respect the rights defined in UN's Universal Declaration of Human Rights. We have zero tolerance for human rights violations. We assess actual and potential adverse impacts and implement measures to cease, prevent or mitigate them.
- Employees and suppliers are encouraged to report all incidents and will not be subjected to reprisals unless such incidents are found to be of a wilful or self-inflicted nature.
- We ensure that our suppliers follow the same commitments and have their own Code of conduct.

All employees have a confidentiality clause in their contracts to prevent any business-related information regarding the company, its clients or other third parties are shared with any unauthorized persons. The clause of confidentiality continues to apply after termination of the contractual relation between GWS and the person.

A handwritten signature in black ink, appearing to read "M. Høj Olsen".

Michael Høj Olsen
CEO, Global Wind Service

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1 Definitions

The following table contain an overview of definition for words and terms using in this policy.

Word/term	Definitions
Facilitation payments	Facilitation payments are a form of bribery made with the purpose of expediting or facilitating the performance by a public official of a routine governmental action and not to obtain or retain business or any other improper advantage. The facilitation payment is typically demanded by low level and low-income official to obtain levels of service normally available e.g. licenses. Facilitation payments are prohibited in most countries.
Gifts and hospitality	<p>Gifts are presents such as flowers, confectionary or wine. Tickets to sports and cultural events which are given to an individual and not used in a hosted business context are also gifts.</p> <p>Hospitality is invitations to meals, receptions, sports and cultural events etc. hosted in a business context.</p>
Whistle blower	A whistle blower is an employee or external stakeholder who reports misconduct to people or entities that can take corrective action. Whistle blowers may be ostracized by their co-workers, discriminated against by future potential employers, or even fired from their organization. The whistle blower channel is intended to protect whistle blowers from this type of workplace bullying.
Whistle blowing (vs. making a complaint)	<p>Whistle blowing occurs when a concern is raised about danger or illegality that affects others (e.g. clients or their employer). The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistle blower rarely has a personal interest in the outcome of any investigation into their concerns. As a result, the whistle blower should not be expected to prove their case; rather he or she raises the concern, so others can address it.</p> <p>When someone complains, they are saying that the treatment could involve a breach of their individual employment rights or bullying, and the complainant is seeking justice for themselves. The person making the complaint therefore has a vested interest in the outcome, and, for this reason, is expected to be able to prove their case.</p>

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1.1 Compliance with Law

All employees must protect the company's legality. GWS is committed to full compliance with the laws, rules, and regulations of the countries in which it operates. Consequently, all employees must comply with all applicable laws, rules and regulations when performing their duties.

Employees need to be aware of and comply with the legislation and regulations that affect how they carry out their duties, including those of other countries when traveling out-of-country on GWS business.

GWS expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships, and public image and protect the workplace for the benefit of their colleagues and the company. No information obtained illegally or unintentionally from business partners shall be distributed or used by the GWS. The distribution or use of such information might be in breach of competition, civil or criminal laws.

1.2 Corruption

All form of corruption or bribery is strictly prohibited. Corruption is understood as the misuse of entrusted power for personal gain. This includes any type of undue payments made to influence someone conducting their duties, and/or where someone gain undue personal benefits like kickbacks from suppliers.

GWS has a zero-tolerance attitude towards bribery and corruption. This policy extends to all GWS's business dealings and transactions in all countries in which it or its subsidiaries and associates operate.

GWS and its employees commit to the pursuit of integrity and transparency. The responsibility for implementation, monitoring and questions regarding the principle's rests with Management.

1.3 Bribery

Our rule is simple – don't bribe anybody, at any time, for any reason.

This includes offering, promising, giving, accepting, or soliciting of an undue advantage of any value which could be financial or non-financial. This might be directly or indirectly, and irrespective of location(s), in violation of applicable law(s), as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties. Such improper behaviour can be, but is not limited to, making and/or receiving inappropriate cash payments, gifts, travel arrangements, accommodations, or services.

GWS requires and expects transparency in all transactions undertaken when business is conducted on its behalf. All such transactions shall be backed up by invoices between the relevant parties to ensure transparency with respect to traceability on authorisation and ultimate receipt of payments.

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GWS will conducting all aspects of its work in compliance with the anti-bribery laws that at any time are applicable to the organisation. These currently include but not limited to the following:

- The European Anti-corruption convention
- The UK Bribery Act
- U.S. Foreign Corrupt Practices Act
- German Anti-Corruption Legislation
- Norwegian Penal Code

No employee will be penalised or be subject to other adverse consequences for refusing to pay bribes even if it may result in GWS losing business.

1.4 Political and Charitable Contributions and Sponsorships

GWS will not participate in political contributions (financial or other support to political parties or political campaign efforts). Employees may exercise their private rights to participate in the political and democratic process.

GWS is against facilitation payment and will actively fight it when we meet it. Faced with a demand for a facilitation payment, excessive gifts or hospitality the following steps must be taken by the person faced with the demand:

- Actively resist the payment, gift or hospitality.
- Inform your manager, if possible, before making any payment.
- Keep any amount to a minimum.
- Create a record concerning the payment.

Community support and donations are acceptable, be it in-kind services, knowledge, services exchange, or direct financial contributions. Managers and employees must ensure through due diligence and transparency, that charitable contributions and sponsorships are not used as a subterfuge for and do not constitute bribery.

1.5 Gifts & Hospitality

We generally discourage employees from accepting gifts from clients or partners but will not restrict this from happening. Gifts and hospitality must be reasonable, not excessive and not exceed nominal value.

The following gifts are accepted:

- Working meals of ordinary character
- Congratulatory gifts on specific celebration events
- Smaller product samples at visits to other companies

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- Ornamental gifts or souvenirs of moderate value
- Normal business sales promotion items (pins, pens, USB-sticks etc.)

Events and entertainment should be reasonable and appropriate for the occasion with a legitimate business purpose. Events that require extensive travelling and extended guest status are rarely appropriate.

All gifts or representations given to external business partners shall be backed up by invoices or receipts and should, where practically possible, contain GWS's logo. It is unacceptable under any circumstance to offer, promise or give any gifts or representation to a public official.

All gifts to internal employees within GWS shall be of limited value and must have approval from the function Director or Area Manager. Hospitality, either received or given in association with GWS' business shall be of an appropriate limited value.

When dealing with Government, hospitality and gifts must be within the laws of the country as it pertains to government officials. Hospitality and gifts which are excessive or could be seen to influence judgements is not acceptable.

Examples of improper behaviour include cash payments, gifts, travels, accommodations, or services.

Certain behaviour is always unacceptable; like gifts to public officials, gifts in relation to a bidding process, money gifts and improper entertainment (e.g., sexual content or gambling).

1.6 Protection Money

In some parts of the world 'protection' is offered. This a form of extortion which may involve physical threats. GWS will not pay protection money.

As GWS have an obligation to our employees and business partners, such incidents will be reported to management immediately, and in certain situations may lead to a cessation of business.

1.7 Compliance with Policies and Procedures

Employees are expected to be familiar with the policies, procedures, and other documents relevant to their responsibilities and conduct themselves in a manner consistent with those.

1.8 Lead by Example

All employees of GWS – especially leaders and managers – must act with integrity and inspire trust.

While all employees are expected to act ethically, each manager and leader has the increased responsibility of leading by example.

GWS expect all leaders and managers to serve as positive role models and inspire others to embrace our Code of Conduct by:

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- Rewarding integrity.
- Encouraging ethical decision-making.
- Creating an open work environment where team members feel comfortable raising concerns.
- Preventing retaliation against those who speak up.
- Seeking help in resolving and escalating issues when they arise.

1.9 Ethics Filter

GWS provide guidelines to the employee to take the right actions when facing difficult situations. If an employee is a situation where they are unsure of what to do, they have to ask themselves the following questions. Only proceeding if the answer is yes to the following three questions:

- 1) Is the action I am considering legal?
- 2) Is the action in compliance with GWS policies and procedures?
- 3) If my action was reported on the front page of a newspaper, would I still feel comfortable?

If in doubt the right approach is always to contact the line manager or HR-representative. You can also submit a question or raise a concern of a suspected violation of our Code or any other policy following the Whistle-blower channel.

1.10 Business Relationships

GWS expect that our business partners follow ethical guidelines and comply with the legal requirements.

Subsidiaries and Business Partners: GWS will act with due care before engaging with a business partner and ensure that subsidiaries and business partners know and respect our programme for countering bribery and corruption.

Distributors and Agents: Compensation paid to distributors and agents must be appropriate and justifiable remuneration for legitimate services rendered. The relationship must be documented, and the agent or distributor must contractually agree to comply with our programme. We reserve the rights to termination in the event that agents pay or solicit bribes or in any other ways violate this programme or the law.

Contractors and Suppliers: We conduct our procurement practices in a fair and transparent manner, and we act with due care when evaluating major prospective contractors and suppliers. We will make our anti-bribery policies known to our contractors and suppliers. We reserve the rights to termination in the event that our contractors or supplier's agents pay or solicit bribes or in any other ways violate this programme or the law.

We will avoid dealing with prospective contractors and suppliers known to be paying bribes.

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Communication and Training: GWS will ensure that all their employees are informed about and understand this policy. Each employee will receive relevant training and new employees will be briefed as a part of the welcome onboarding program. At a minimum key employees will receive yearly mandatory training including compliance with laws, regulations, or standard conducts relevant for our field of business.

1.11 Whistle blower

GWS has a whistle blower channel setup which can be used by internal and external people.

Whistle blowing is the confidential disclosure by an individual of any concern encountered in the workplace relating to a perceived risk, malpractice or wrongdoing that affects others such as clients, suppliers, other staff, the company or the public interest, e.g.:

- Serious and continued breaches of safety rules.
- General malpractice – such as immoral, illegal or unethical conduct; including where someone's health & safety has been put in danger.
- Gross misconduct.
- Potential breaches of the GWS Code of Conduct.

While the company encourages whistle blowers to identify themselves, anonymous calls or information raised will be taken seriously and investigated fully. However, the effectiveness of any whistle blowing enquiry may be limited where an individual chooses not to be identified.

There will be no adverse consequences for anyone who reports a whistle blowing concern in good faith. However, any individual found responsible for making allegations maliciously or in bad faith may be subject to disciplinary action.

The following actions may be taken after investigation of the concern:

- Disciplinary action (up to and including dismissal) against the wrongdoer dependant on the results of the investigation.
- Disciplinary action (up to and including dismissal) against the whistle blower if the claim is found to be malicious or otherwise in bad faith.
- No action if the allegation proves unfounded.

The whistle blower will be kept informed of progress and the outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions generally.

The whistle can be used by sending an email address: whistleblower@globalwindservice.com

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Information about this email address is available on the Global Wind Service home page, so it is available for internal as well as external stakeholders. State the name “Whistle blower” in the subject field.

The Head of Legal will review the details and will take actions on the information raised.

1.12 Roles and Responsibilities

It is every employee’s responsibility to counter bribery and corruption in GWS by adhering to this policy.

Every manager and employee have an individual obligation to ensure that any interaction with public officials complies with all relevant laws and regulations, as well as this policy.

It is the responsibility of every manager to communicate this policy and ensure that all employees and external parties working on behalf of GWS, within their area of responsibility, understand and comply.

1.13 Version history

Revision	Content
05	Updated by combining the Code of conduct, the anti-corruption and whistle blower policies into one Code of conduct containing all information.
06	Updated with change of reviewer of the Whistleblower system. Changed to the Head of Legal.