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1. PURPOSE AND SCOPE OF THIS POLICY

Parkwind develops, finances, constructs, operates, maintains and monitors offshore wind farm assets with the goal to become a driving force in the transformation of the energy landscape through a reliable and competitive offer of offshore wind energy for the community. Parkwind is driven by long term commitment, applying innovative and sustainable solutions and Parkwind values collaborative and trusting relationships with all key stakeholders.

Parkwind aspires to live by the highest standards of integrity and acknowledges its corporate responsibility to respect and embed environmental, societal and governance considerations into its business conduct and operations. Therefore, Parkwind is committed to act as a responsible partner to all stakeholders and to address the impacts its business operations may have on the environment, people and society.

2. COMMITMENTS

The renewable energy sector is governed by an extensive set of existing laws and regulations, and is characterized by rapidly evolving legislative frameworks. Parkwind and its affiliates shall ensure activities are conducted in accordance with applicable international, national, and regional laws and regulations.

Parkwind strives to maximise its business handprint while minimizing its business footprint. In this light, Parkwind commits to conduct its business activities in alignment with internationally recognized standards and principles, such as, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business & Human Rights and the Equator Principles. More specifically, Parkwind shall commit to implement a set of (i) environmental (ii) social and human rights, and (iii) governance principles.

Environmental principles


- **Responsible environmental practices**

Parkwind is committed to preserve, protect and restore the environment by promoting responsible and scientifically supported environmental practices. Parkwind shall ensure compliance to applicable environmental laws and legislations, as well as international standards and sector practices.

Notwithstanding the local regulatory framework, Parkwind commits to use best endeavours to ensure implementation of adequate measures to prevent or mitigate environmental damage or biodiversity loss.

Moreover, Parkwind engages itself to continuously work on innovative technologies and contribute to research and development minimizing Parkwind's impact on the environment and (where possible) maximize the positive impact of projects.

Appropriate resources shall be made available based on the materiality of the environmental impact, the remedial character and other business considerations.

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- **Resilience to climate change**

Parkwind shall make the necessary efforts to ensure the resilience of its operations, infrastructure and assets to physical and transitional climate change risks and endeavor to reduce any emissions or waste, on land, air and water as a result of its activities.

Social and human rights principles

- **Promotion of inclusion and equal opportunities**

Parkwind considers diversity as an asset. Business decisions, whether internal (e.g., hiring, evaluation, promotion, compensation, termination) or external (e.g., selection & control of suppliers and/or (sub)contractors), shall be based solely on criteria such as training, competency & experience, merit, potential, and objective and non-discriminatory business considerations. Parkwind shall ensure that everyone is treated fairly and with respect and shall not tolerate any form of discrimination or harassment e.g., (non-exhaustive) on the grounds of race, colour, gender, language, religion, political opinions, nationality, social background and status, union membership, age, health status or disability, pregnancy, sexual orientation, ...

- **Promotion of health, safety and employee wellbeing**

Parkwind is strongly committed to health, safety and wellbeing of Parkwind staff, the staff of business partners, suppliers and (sub)contractors. HSSE processes and procedures, which are at minimum compliant to legal requirements and obligations, shall at all times be respected.

- **Respect and promotion of human rights**

Parkwind is committed to conduct its activities in alignment with the UN Guiding Principles on Business and Human Rights. This includes the principles and rights set out in the eight fundamental conventions identified in the ILO Declaration on Fundamental Principles and Rights at Work, and the International Bill of Human Rights. These commitments include (but are not limited to):

- Freedom of association and recognition of the right to collective bargaining
- Elimination of all forms of forced labor including any form of modern slavery
- The abolition of child labor
- Elimination of discrimination in respect of employment and occupation
- Indigenous people, minorities and other vulnerable group's rights

Governance principles

- **No anti-competitive or unfair behaviour leading to the disruption of fair competition.**

Parkwind supports transparent and competitive markets and shall comply to laws protecting fair competition and combatting illegal practices such as price fixing, bid rigging, market allocation, anti-competitive or monopoly practices.


- **Respect for laws regarding securities trading and insider information**

- **Avoidance conflicts of interest**

Conflicts of interest shall be avoided, and where necessary be managed appropriately.

- **Zero tolerance on corruption, bribery, money laundering or financing of terrorism**

Any form of bribery or corruption shall not be tolerated. Gifts and hospitality may only be accepted when reasonable, proportionate and appropriate to the circumstances. Giving or receiving sponsorships or donations to e.g., sports, cultural, charitable events are only allowed when considered appropriate and do not account to bribery. Reference is made to Parkwind's Expense Policy.

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- Safeguarding of confidential information, intellectual property rights and data privacy**
 (Confidential) information shall only be used for its intended purposes. Parkwind shall take appropriate measures to prevent accidental disclosures and ensure legal, contractual and business requirements are respected while handling information. Privacy and personal data of employees and business partners shall be safeguarded, and treated in accordance with applicable laws and regulations, including GDPR.
- Adequate sustainability due diligence practises**
 Parkwind shall ensure adequate environmental and social due diligence processes in line with the UN Guiding Principles on Business and Human Rights are put in place. This includes Parkwind's commitment to:
 - Identify and assess actual and potential negative environmental and social impacts
 - Systematically avoid and address negative environmental and social impacts.
 - Track effectiveness of the due diligence approach.
 - Communicate on how impacts are addressed and formally report on severe risks.
 - Provide remedy when causing or contributing to actual negative impacts and establish grievance mechanisms where individuals or groups can raise concerns about adverse impacts.

3. IMPLEMENTATION OF THE POLICY

To implement this policy, Parkwind shall transpose its commitments where needed into country or project-level procedures and actions plans. Parkwind has an elaborate set of corporate policies, processes, and procedures, such as Parkwind's Code of Conduct and Supplier Code of Conduct, embedding its commitments into day-to-day business.

Moreover, where required, corporate- and operational-level grievance mechanisms are available and accessible to Parkwind employees and other stakeholders, intended to receive and facilitate the resolution of concerns and grievances about human rights and environmental impacts of business activities and/or projects.

The Executive Management of Parkwind underwrites this ESG Policy, commits to provide adequate and appropriate resources, and will ensure this Policy is properly communicated and understood by all. This policy will be evaluated on a bi-annual basis and where relevant updated accordingly.

 PARK WIND JERA GROUP	François Van Leeuw, Permanent representative Van Leeuw Consulting bv, Parkwind co-CEO	Eric Antoons, Permanent representative Neos Anemos bv, Parkwind co-CEO