

Ænergy Code of Conduct

Purpose

This Code of Conduct sets forth standards and expectations to guide all construction and procurement activities related to solar parks, ensuring alignment with the EU Taxonomy's environmental and social criteria. It promotes transparency, ethical sourcing, and sustainable practices that reduce environmental impact, respect human rights, and uphold responsible business conduct.

Scope

This Code applies to all entities involved in the construction and procurement processes for solar park projects, including suppliers, contractors, subcontractors, and other business partners. Compliance with these principles is mandatory, and all parties must document adherence to each requirement.

1. Environmental Sustainability

1.1 Energy Efficiency and Resource Conservation

- **Objective**: To minimize use of resources and energy consumption at every stage of construction and procurement.
- **Requirements**: Suppliers and contractors must prioritize energy-efficient technologies and processes, utilizing equipment and practices that reduce energy consumption without compromising performance.
- **Documentation**: Energy audits, resource utilization reports, and documentation of energyefficient technologies used must be maintained and made available upon request.

1.2 Lifecycle Assessment (LCA) / Environmental Product Declaration (EPD)

- **Objective**: To ensure that all products and components are evaluated for their full environmental impact from production through disposal.
- **Requirements**: All components must undergo a Lifecycle Assessment (LCA) or at least an EPD to assess their carbon footprint, resource use, and potential for environmental degradation.
- **Documentation**: Suppliers must provide LCA or at least EPD documentation demonstrating the environmental impact of their products, including carbon footprint metrics and waste generation estimates, to ensure alignment with EU standards.



1.3 Avoidance of Harmful Substances

- **Objective**: To prevent the inclusion of harmful or hazardous substances in components, ensuring safety for the environment and public health.
- **Requirements**: All components and materials must be verified as free of harmful substances as defined by EU REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals) and other relevant EU directives. This includes restricted or regulated chemicals, toxic heavy metals, and other harmful compounds.
- **Documentation**: Suppliers are required to provide certification that all products meet EU safety standards for hazardous substances, along with Material Safety Data Sheets (MSDS) and regulatory compliance documents for each component.

1.4 Circular Economy Principles and Material Recycling

- **Objective**: To support a circular economy by prioritizing recyclability, reusability, and responsible disposal of all materials.
- **Requirements**: Suppliers must ensure that products are designed with end-of-life disposal in mind, promoting high levels of recyclability, modularity for reuse, and use of sustainably sourced or recycled materials.
- **Documentation**: Detailed reports on the recyclability of components, percentage of recycled content, and proof of sustainable sourcing (e.g., certifications such as FSC for wood) must be provided.

2. Social Responsibility and Ethical Sourcing

2.1 Fair Labor Practices

- **Objective**: To ensure that all individuals involved in the supply chain work under fair and lawful conditions.
- **Requirements**: Compliance with fair labor practices, including fair wages, reasonable working hours, and safe working conditions, is mandatory. Suppliers must also adhere to non-discrimination policies.
- **Documentation**: Detailed records of labor conditions, wage structures, and adherence to international labor standards such as ILO standards must be provided. Suppliers should conduct regular audits and provide compliance certifications to verify fair labor practices.

2.2 Health and Safety Standards

- **Objective**: To safeguard the health and safety of all workers throughout the project lifecycle.
- **Requirements**: All suppliers and contractors must adhere to high health and safety standards in compliance with EU regulations, conducting regular safety audits and implementing effective risk management systems.



• **Documentation**: Suppliers must maintain health and safety records, risk assessments, and incident reports. Proof of compliance with relevant EU health and safety standards (e.g., EU Directive 89/391/EEC on occupational health and safety) must be accessible for review.

2.3 Human Rights and Prevention of Exploitation

- **Objective**: To uphold human rights across all levels of the supply chain, ensuring ethical treatment and prevention of exploitation.
- **Requirements**: Suppliers must prevent child labor, forced labor, and any other form of exploitation, following international human rights guidelines such as the UN Guiding Principles on Business and Human Rights.
- **Documentation**: Suppliers must keep human rights compliance reports, including certifications and evidence of monitoring processes. Independent audits should be conducted where feasible to verify adherence to human rights standards.

3. Governance, Compliance, and Ethical Conduct

3.1 Transparency and Reporting

- **Objective**: To promote transparency regarding environmental, social, and governance (ESG) impacts in line with EU Taxonomy standards.
- **Requirements**: All parties must maintain transparent records and report on environmental and social impacts, including detailed sourcing information for all components.
- **Documentation**: Suppliers must submit ESG impact reports, supply chain traceability documentation, and disclosures as required by EU regulations. Independent verification of reported data is encouraged to ensure accuracy.

3.2 Risk Management and Compliance Assurance

- **Objective**: To identify, mitigate, and monitor potential environmental and social risks across the supply chain.
- **Requirements**: Suppliers must implement risk management systems that address compliance risks related to environmental, social, and governance criteria, aligned with EU directives.
- **Documentation**: Suppliers are required to maintain comprehensive risk management documentation, including risk assessment reports, mitigation plans, and compliance assurance processes. These should be reviewed and updated regularly.

3.3 Anti-Corruption, Integrity, and Business Ethics

- **Objective**: To uphold ethical business practices free from corruption, bribery, and conflicts of interest.
- **Requirements**: All stakeholders are expected to conduct business with integrity, strictly prohibiting bribery, corruption, and unethical practices.



• **Documentation**: Suppliers must provide training records, anti-corruption policies, and documentation of internal controls for ethical conduct. Regular assessments and audits should be conducted to verify compliance.

4. Monitoring, Documentation, and Continuous Improvement

4.1 Comprehensive Audits and Documentation Verification

- **Objective**: To ensure that all requirements of this Code of Conduct are strictly followed, verified, and documented.
- **Requirements**: Regular third-party audits will be conducted to confirm compliance with all code requirements. Suppliers and contractors must maintain detailed, accessible records for each requirement, including environmental and social compliance documentation.
- **Documentation**: Audited compliance reports, supplier certifications, and all supporting documents related to sustainability, safety, and ethics must be stored and readily available for review.

4.2 Training and Capacity Building for Continuous Improvement

- **Objective**: To foster ongoing improvement in sustainable and ethical practices through training and development.
- **Requirements**: Regular training on the EU Taxonomy, sustainable practices, and ethical standards will be provided for all stakeholders. Continuous improvement plans must be developed to raise environmental and social standards over time.
- **Documentation**: Training records, improvement action plans, and assessments of progress must be documented. Suppliers are expected to demonstrate a commitment to continuous enhancement of practices in line with EU standards and industry best practices.