



# CODE OF CONDUCT

This Code of Conduct defines the core requirements on suppliers, affiliates, and third parties of GAZELLE WIND POWER to fulfil their responsibilities toward their stakeholders and the environment.

## Disclaimer:

This policy extends to the operations and business activities of GAZELLE and its affiliates throughout the world, as well as to GAZELLE employees wherever they live and work.

In case of conflict between the applicable laws of a country and GAZELLE's policies, the law becomes precedence. It lies within the responsibility of the discoverer to make GAZELLE aware of such differences. In cooperation with GAZELLE's legal team conflict resolution needs to be pursued. Please use GAZELLE's compliance notification system [compliance@gazellewindpower.com](mailto:compliance@gazellewindpower.com) to reach out.

Subject to changes and errors.



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## 1 General principles

GAZELLE is dedicated to fast, agile operational execution with sustainability and committed to the United Nations to comply with the Ten Principles of the UN Global Compact. Collaborative commercial success and social responsibility are interdependent. We see responsible conduct as our foundation in relations to business dealings with our business partners and affiliates.

We therefore expect our business partners:

- To act with integrity
- To comply with the law applicable to them, e.g., human rights, anti-corruption, data privacy, competitions, and environment
- To ensure our Code of Conduct is also respected by their own business partners
- To act honestly and fairly.

## 2 Corporate Social Responsibility

Our accountability towards social responsibility is embedded in our culture and business dealings and enable us to have long-term success with our suppliers, affiliates, third parties, stakeholders, shareholders, and employees. Therefore, our Code of Conduct extends to our business partners and is applicable no matter what business relationship is or will be entered with Gazelle.

Human Rights From our business partners we expect them to respect human rights applicable to their country of jurisdiction.

Child Labour Child labour must be rejected by our business partners (ILO Convention 138 and 182) at any time and prevention measurements taken also for their own business partners.



Labour Laws	Labour Practices at our suppliers and their affiliates exclude forced labour in form of slavery, involuntary work, indentured labour, bondage, and human trafficking.
Wellbeing	Human wellbeing must be ensured by retaining from inhuman or degrading treatment or punishment (ILO Conventions 29 and 105). This includes appropriate working time in reference to the applicable laws and industry standards, regular employment contracts, and reliable payment of salary and wages according to their minimum payment standards in their respective country.
Diversity	Our business partners act as role models for diversity, inclusion and do not tolerate discrimination due to religion, ethics, sex, etc. (ILO Convention 100 and 111).
Equality	Equal opportunities need to be given to every employee. Equality is irrespective of skin colour, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual integrity, religious conviction, or age.
Freedom of association	The freedom of employed staff to associate in a formation of interest groups must be given. In case an association is formed or in place, employees are free to choose a representative who will negotiate and speak on their behalf (ILO Convention 87 and 98).
Health & Safety	Human health and safety shall be in the centre of their business operations. Ensuring that the workspace and products & services provided fulfil safety standards to protect employees from accidents causing injuries and endangering their wellbeing. Safety & Health trainings need to be held and documented. A proactive approach on reducing sources of danger in general and in reference to their industry knowledge needs to be taken.
Environment	In all we do, we are striving to reduce environmental footprint and contribute to a sustainable future for the next generations. Our business partners contribute by committing to the principles of sustainable business and to environmental protection. They take effective measures to monitor and reduce their environmental footprint constantly.
Data Protection	By protecting data generated by our business partners, provided or accessible to them, Gazelle business partners comply with data protection regulations



applicable to the European Union General Data Protection Regulation (GDPR) in its latest. Our business partners act as role models for diversity, inclusion and do not tolerate discrimination due to religion, ethics, sex, etc. (ILO Convention 100 and 111).

Donations/  
Sponsorship      Gazelle and its affiliates engage in voluntary donations or sponsorship to organizations or people of their choice, but in alignment with the core company values of Gazelle. These are not in anticipation of competitive advantage.

### 3 Sustainability & environment

Value Chain      Our entire value chain from product design, material sourcing, manufacturing to installation a strong emphasis is on reducing materials used and if material use can't be avoided utilization of the least harmful components.

Supplier            Our suppliers and affiliates follow us on this approach and pass on our core principles of sustainable operations to their own value chain, without compromising the performance of our products.

Targets             Gazelle's tireless efforts for continuously improved products and lowering of our environmental footprint requires us to apply systematic ways. Guided by our Sustainable targets, our [Quality, Environment, Health and Safety Standards](#) and [Code of Conduct](#) the Management Team and Suppliers puts strong emphasis on combining the best of all worlds.

### 4 Health and safety

At Gazelle we care for your wellbeing and your safety, and we take the extra mile to maintain and create a protective workspace mentally, physically, and socially.

Value Chain      Our suppliers and affiliates follow us on this approach and pass on our core principles of Health & Safety operations and workspaces to their own value chain.

Training            Business partners ensure their employees receive appropriate safety trainings regularly and are taking preventive actions to reduce risk of accidents.

Rules                All safety guidelines implemented and enforced at supplier sites or applicable at non-Gazelle owned properties apply to Gazelle employees and need to be



followed. In case Gazelle's safety and security measures are more stringent and certain tasks can't be performed by our team due to exposure to risk, suppliers are informed and collaboratively safety hazards need to be overcome.

On site Suppliers comply with safety regulations and standards implemented at our customer sites and act according to these requirements.

## 5 Fair business practices

Gazelle stands for fair business practices and trade. We do not tolerate improper competition and fraudulent behaviour. We expect our business partners to follow strictly our guidelines and policies to ensure fairness is always given.

Corruption This involves zero tolerance to corruption, fraud or economic crime to their own employees or affiliate employees. Any payments towards consultants, agents, brokers and/or other intermediaries must not serve the purpose of unfair advantage. Selection of third parties serving our business partners is based on the value of transparency and with diligence appropriate to uncover potential misconduct during onboarding and during execution of services & products supplied by those third parties. All parties act cautiously to avoid conflict of interest that may lead to corruption risk.

Competition Our business partners comply with all relevant competitive laws and regulations and do not engage in activities that influence prices, conditions, strategies, or customer relations. This is also true for tender & bids procedures. In dealings with public officials/government/political parties our business partners remain transparent and honest and do not provide or receive invitations that are not appropriate to standard business practices or are indicated as outside legal regulations by guiding law of their respective country.

Regarding exchange of information or sensitive documentation our business partners distance themselves from any other conduct that unlawfully restricts or may restrict competition. Information received containing competitors' information not publicly accessible to the industry or acquired by us in form of reverse engineering shall not be used to influence business results such as generating profits for Gazelle.



Invitations and Gifts	Receiving and giving invitations and gifts need to be handled with great precaution to avoid anticipation of any improper benefits or preferential treatment. Business partner's guidance for dealings of that sort are applicable laws (especially anti-corruption laws).
Money laundering	Suitable measures are taken within our business partners' organizations to prevent money laundering activities.
Anti-Terrorism	None of our business partners is directly or indirectly engaged in financing of terrorism or providing services & products enabling terrorism.
Export and Import controls	Our global network of business partners with global business activities, comply with effective laws on the import and export of goods, services and information and follow current embargoes and sanctions established by their government representatives.

## 6 Responsible mineral sourcing

Business Partners take responsible and tangible efforts to prevent mineral sourcing (raw material) in high-risk areas or conflict affected areas which contribute to violations of human rights, abuse, violence, corruption, financing of armed groups or terrorism against people, the environment and in general to the disadvantage to others or similar effects.

## 7 Compliance

Gazelle Business partners ensure all policies and principles are set out in this Code of Conduct are complied with and extended to their own business partners. The selection of business partners by Gazelle and by their suppliers is done diligently, the principles set out in this Code of Conduct or equivalent principles are communicate and evaluated and Business Partners actively enforce and promote compliance to their suppliers.

Grievance Mechanism	A business appropriate compliance management system including tools and channels of communication are set up in our partner's organizations, which enables parties to report crimes or business misconduct anonymously. Retaliations against persons who report violations of the principles set out in this Code of Conduct shall never be tolerated. ("Whistle-blower").
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Audit	Gazelle is allowed to irregularly and unannounced verify implementation of principles stated in this Code of Conduct through audits. It shall be emphasized that forthcoming of potential violations by our business partners is a sign of trust and honesty established in our business relations.
Conflict of Interest	In case violations to these principles are uncovered and are of a minor nature (not in clear contradiction to laws or UN resolutions, for example non documented record of the person in your company responsible for legal compliance) the business partners will be given the opportunity to implement corrective actions and prevent reoccurrence through adaptation or changes in their organization within a binding period. Business partners need to report out to Gazelle on the progress and the nature of these activities. For severe violations (contradicting laws or UN resolutions) Gazelle reserves the right to sanction against the respective business partner, terminate the business relationship and seek arbitration for damages and other rights.

## 8 Intellectual property protection

Gazelle Wind Power is a world leading green energy enabler aiming to revolutionize the industry through forward thinking life-cycle products with massive impact on reducing carbon footprint in the entire value chain. Therefore, our intellectual property is highly valuable to our business operations and key to generate investment returns to our shareholders and stakeholders.

Non-Disclosure	All our employees, suppliers, and business affiliates are bound to Non-Disclosure Agreements to protect the company's intellectual property and any breach of these agreement will result in serious consequences such as termination of work relationship, seeking of arbitration including claiming losses and damages caused by voluntarily or involuntarily communication through any sort of communication channel to parties outside the Gazelle network.
Information, Data	Information that falls into the category of intellectual property are any documents, data, reports, analyses, expert opinions, organizational plans, programs, service descriptions, drafts, calculations, drawings, data carriers, processes, products, etc.
Confident	In general, all information provided and sourced at any of Gazelle's customers, shall be treated as confidential information, if specifically, or not specifically referenced to a Gazelle customer, labelling is not required but recommended.



Data Security	All parties shall properly and securely store all information and take reasonable action to prevent loss or damage or access of third parties to information and data.
Privacy	Never acquire, use, or disclose individual information in ways that are inconsistent with our privacy or intellectual property policies or with applicable privacy and data protection laws, regulations, and treaties.
Exceptions	Excepted are disclosure requirements to Gazelle internal auditors or initiated and legally binding disclosures requested by government authorities or its representatives.

## 9 Reporting

Report	We have established an independent audit approach to ensure our facilities, functions, and business partners act in compliance with our policies and standards.
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We encourage every stakeholder to report any concerns or in case of uncertainty seek clarification to compliance related matters. To continuously improve our compliance standards and policies, we also ask internal and external parties to provide us with insights on what we can do better.

Our Compliance Ombuds Process and Tools enable internal and external stakeholders to report possible misconduct. Reports can be submitted 24/7, incoming reports are not traced (“Whistle-blower”) or reporting parties registered. The decision on further actions to be taken is made by our independent corporate compliance office and all reports are treated confidentially.





Visit our website  
[Gazellewindpower.com/integrity](https://Gazellewindpower.com/integrity)

You'll find more information including:

- Our management approach
- Sustainable governance
- Policies and commitments
- Stakeholder value
- Technological advantage
- How to raise a concern

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