



PEOPLE

This Policy emphasizes GAZELLE Wind Power's strong ethical, moral, and social responsibilities towards the wellbeing of employees, 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 to reach out.

Subject to changes and errors.



PEOPLE

This Policy demonstrates our GAZELLE WIND POWER's Management commitment toward our Corporate Social Responsibility, our strong ethical and moral values, and our integrity toward all stakeholders.

1 General principles

GAZELLE Wind Power Limited is dedicated to fast, agile execution and sustainability. Collaborative commercial success and social responsibility are interdependent. We see integrity as our foundation in relations to business dealings with our business partners and affiliates. Our social responsibility is the anchor to all what we do. We are converting business strategy into competence and accountable execution while being to the Ten Principles of the United Nations Global Compact.

We therefore support with our full force and heart

- The retainment of United Nations Human Rights and local employment laws
- Encourage a diverse company culture
- Invest in our employees to unlock their full potential
- Communicate honestly and frequently
- Protect our employees from safety concerns
- Ensure fair and a harassment -free work environment for all.

2 Human and labour rights

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 into with Gazelle.

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



Labour Laws 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.

Health & Safety Labour Practices at our suppliers and their affiliates exclude forced labour in form of slavery, involuntary work, indentured labour, bondage, and human trafficking.

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.

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).

3 Diversity & inclusion

Diversity At Gazelle we embrace diversity, provide an open culture of respect toward each other, as we are convinced that diversity is a driver for innovation and economic growth. We do not tolerate discrimination of any sorts and against any individual or group of people. Our international business environment stands strong on collaboration across cultures and functions.

Business Partner We are passing on our highest moral standards to business partners and their affiliates to energize a work environment based on integrity, moral and ethical values. Our business partners, just like us, act as role models for diversity, inclusion and do not tolerate discrimination due to religion, ethics, sex, etc. (ILO Convention 100 and 111 and United Nations Human Rights Codex).

Equality In the centre of our approach stand equal opportunities and equal treatment of employees during the recruiting process and their employment period. Equality is irrespective of skin colour, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual integrity, religious conviction, or age.



- Management** Gazelle’s Management team is bound to live a culture in which any sort of harassment will not be tolerated, and actions are taken to prevent and avoid exposure to any sort of discrimination.
- Employees** Employees of Gazelle need to act with integrity and are also requested to avoid any sort of harassment or discrimination, speak up to their management and demonstrate their integrity with our values while collaborating with others inside and outside the organization.
- Action** Actions that clearly contradict with our standards may include mental cruelty, sexual harassment or discrimination including gestures, language, and physical contact, that is sexual, coercive, abuse, threatening or exploitative. The unwanted intention of the person conducting any of such kind is irrelevant if the person affected by these actions is perceiving words, gestures, or physical contact is not in line with our moral or their own standards of proper business contact.
- Reporting** We are taking every single report, incidence, or observation very seriously and are striving toward becoming better as an organization and team preventing any sort of harassment which is in strong contradiction to our core values. Use our 24/7 compliance reporting tool (compliance@gazellewindpower.com) to solve any issues of this sort.

4 Development & growth

- Personal Growth** We believe in personal growth being related to business growth. That’s why we, the management team in cooperation with our Human Resource department and functional leaders, periodically evaluate the development opportunities for our employees, while considering their personal preferences on roles & responsibilities and career goal settings.
- Skills** Our strong employee development programs enable our employees to unlock their full potential while providing constancy and stability for those who are in the roles they wish to be.
- Reviews** Regular employee development reviews help us understand the needs and goals of every individual employee. These reviews are held on a functional level through daily interaction and on management level within the established framework of employee development, a joint effort with the Human Resources department.



This framework enables employees and Gazelle's management team alike to set targets, goals and continuously track progress toward these.

- Feedback** In their daily interactions with the functional leadership, employees are given the opportunity to request feedback, share their ideas and thoughts on their own growth and development progress.
- Roadmap** Based on all the inputs provided by employees, functional leadership and management the Human Resource department develops a clear guideline on training requirements per role and function.
This includes Environmental Health & Safety (EHS) trainings, functional trainings, general trainings, and personal development plans.
- Openness** We are asking our employees to verbalize their needs and be precise on the path they want to take with Gazelle to ensure we are customizing trainings towards needs, ultimately supporting our business growth as a team.
- Accountability** On the job learning, mentoring, coaching, and job rotations are essential to the development of knowledge and capabilities within Gazelle. Our employees are ambitious and motivated to act in accordance with our strategic business goals and take steps toward achieving these by themselves. Gazelle is providing access to resources and within its open culture enables employees to educate and learn cross functional, based on facts and data and from others.

5 Awareness & compliance

- Compliance** We are unlocking massive potential with our technology, employees and as a business operation we are set out to push the industry boundaries. That is why we are committed to act compliantly, fairly, and to continuously reduce our risk exposure which might be harmful to our organization. Every individual in our business dealings on all levels of the organization shares this responsibility.
- Responsibility** To provide guidelines on compliant and ethically correct actions and non-actions to support our joint effort toward continuous business growth, we have summarized some key pillars of our business conduct standards here. The true value of a company lies with its people and that's why we train our compliance guidelines, discuss in teams, and document learnings and



uncover organizational development goals. These guidelines do not claim completeness and the responsibility remains with everyone.

- Transparency** As a corporation we act with transparency and accuracy being led by our honesty and integrity. Our employees take a caretaking approach enabling us to make decisions based on facts with the best possible outcome after weighing in all data available. Documentation of our employee's work is essential to become better as an organization. Accessibility of data to co-workers are beneficial to create a collaborative and supportive work environment aiming at constant growth. This includes measurement results of product testing results, risk analysis, financial reporting, documentation aiming for customer communication, etc.
- Accuracy** Part of this requirement is accuracy driven by indicating for example dates or versions or changes to original version. Applicable also to financial books and record keeping.
- Non-Compete Clause** Our teams put their energy into evolutionary technology advantage and financial performance. A careful handling of competitive information and non-compete clauses are essential to protect our advantages long term.
- Relationship** We are building strong relationships with our customers, investors, and partners to engage in successful business dealings. In our vast network it can happen that people from different interest groups might be familiar with each other, causing indirect or direct effects on fair business practices (hiring family members, insider trading, etc.). We encourage disclosure to leadership of the existence of those relations and to seek resolution to avoid any unclarity toward the nature of the business.
Being a majority shareholder or investor in any other business corporation outside Gazelle's Group needs to be communicated to our Human Resource department without exception.
- Gift Policy** Receiving invitations and gifts needs to be handled with great precaution to avoid anticipation of any improper benefits or preferential treatment. To protect our Gazelle employees, we recommend to politely decline gifts valued more than 50 (fifty) Euros and accept invitations to lunch and dinner only if no financial or other business benefit is expected in return for this invitation.
- Sponsoring** Gazelle and its affiliates engage in voluntary donations or sponsorship to organizations or people of their choice, but in alignment with our core



company values. These are not in anticipation of generating competitive advantage. Political party sponsorship is strictly excluded. Employees are encouraged to suggest sponsoring and donations in our field of expertise or in alignment with our core values. Management takes decisions on entering a sponsorship or donation relationship based on strategic corporate goals or representation of core values.

Non-Profit We are proud for Gazelle to be able to give back and encourage our stakeholders, business partners and employees to actively participate in non-profitable organizations, charities, and social initiatives aiming at protecting the environment and powering the world with green energy, and if they are not in contradiction with our non-compete policy.

6 Intellectual property

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.

NDA Therefore, our intellectual property is highly valuable to our business operations and key to generate investment returns to our shareholders and stakeholders. All our employees, suppliers, and business affiliates are bound to Non-Disclosure Agreements (NDA) to protect company's intellectual property and any breach of these agreement will result in serious consequences such as termination of work relationship and the 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.

Definition 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, trade secrets, customer insights, etc.

Confidential 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. All shall properly and securely store all information and take reasonable action to prevent loss or damage of information and data.



Personal Data	Never acquire, use, or disclose individual or personal information inconsistent with our privacy or intellectual property policies or with applicable privacy and data protection laws, regulations, and treaties.
Exception	Excepted are disclosure requirements to Gazelle internal auditors or initiated and legally binding disclosures requested by government authorities or its representatives.

7 Wellbeing & safety

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

Organization	That is why we have a designated team in place who is tasked to identify safety risks, take preventive actions and solid measures to document unexpected occasions with the purpose of avoidance in the future.
Zero tolerance	Our Management is committed to zero tolerance regarding breaches of safety and wellbeing and disciplinary procedures are in place to address safety violations. Employees are required to report safety hazard cases to its manager and customer representative without delay.
Training	Our employees receive regular updates on Health & Safety related topics in the form of trainings, reminders, newsletters, and conversations with their leadership. In joint sessions with their team every employee is given the opportunity to raise awareness on issues previously unknown to Gazelle and functional leaders are bound to follow up on your concerns, ideas, and thoughts to become a safer employer, protecting all employees.
Action	Solutions can be implemented at all levels immediately but need to ensure that solution is not creating a safety hazard elsewhere in the organization.
Prevention	Preventive actions are the first weapon to battle safety risk exposure and some key guidelines stated below are aiming to help creating a risk-free work environment for all.
Workspace	Workspaces need to be kept free of post traps (cables, open cabinets and windows, no storage on corridors, etc.), fire extinguishers accessible always, staircases and emergency exits open, and any alarm signals shall be followed



in case these are activated. Assembly points outside all our Gazelle facilities indicate where to gather in case of an emergency. Assist people who need assistance without bringing harm to yourself or exposing yourself to danger.

- Operations** In our manufacturing facilities including storage plants same rules as stated above apply and in addition colour coding of paths accessible to people visiting the plants and do not require safety shoes and/or hard heads. Any person entering our facilities need to be instructed on safety rules. Marked restricted areas are accessible only to those who have permission to do so. Permission can be granted because of role, training or to outside authorities for safety evaluations of facilities.
- PPE** Personal Protective Equipment (PPE) required to execute jobs needs to be always worn. Our Human Resource department and Environmental, Health & Safety Department keep records and continuously update on PPE requirements based on location, job description and roles. Do not compromise on your protection and exchange PPE as soon as signs of wear or damages are indicating not-fit for purpose. PPE might include safety glasses, steel toe shoes, helmets, climbing gear, gloves, fire and cut resistant jackets, etc.
- Hazardous Material** Hazardous Material needs to be stored separately, cannot be accessible to people who did not receive training on handling of such material and clearly labelled.
- Lifting** Take precaution when lifting material, equipment, parts, tools or other. Utilize supporting gear ready for use.
- Heights** Working at heights is only allowed for people who received proper training. Wearing of fall protection gear is required for any works above 2 meters (6.75 ft), while working in a manlift basket/boom lift or on suspended platforms.
- Traveling** For travels from and to customer sites or Gazelle's facilities precautions and situational adapted behaviour needs to be applied by everyone. Such precautions include but are not limited to while driving always wear a seat belt, drive defensively and in respect to weather and road conditions, try to reduce time spent in public spaces and large crowds of people, be aware of your surroundings, do not text and walk, let a peer or colleague know your destination, share your emergency contact details with Gazelle's team members.



Customer Sites	All safety guidelines implemented and enforced at customer sites or applicable at non-Gazelle owned properties apply to our employees and need to be followed. In case Gazelle’s safety and security measures are more stringent, inform customers about your concerns and work with them collaboratively to overcome safety hazards.
Crisis	<p>In the event of needing immediate assistance ensure you are not exposing yourself to harm by retrieving from the situation, contact Gazelle emergency hotlines and always follow authorities’ guidelines (police, ambulance, fire department, governmental security personnel, etc.).</p> <p>We are preparing constantly for emergency situations, established response protocols and response scenarios are in place.</p> <p>Our security and crisis management plans are updated regularly and reviewed by experts in their field. Clearly our preventive actions, training, and preparation of events (traveling, field work, etc.), and the exemplary behaviour of our employees help us to never use those crisis plans.</p>

8 Communication

We love sharing our great work and share our social and environmental impact driven solutions with the world. Gazelle’s communication department is responsible for all external and internal communication with all stakeholders when it comes to representation of our values, technology driven approach, business ethics and carbon footprint elimination efforts.

Sharing	Please keep some key rules in mind when communicating of outside Gazelle organization.
Confidential	We ask all our stakeholders to apply a good common-sense while sharing on social media or with family and friends. Information not explicitly indicated or labelled as confidential but could in any form harm Gazelle’s technological or business advantage and not shared on our social media channels or in press releases, consider it not fit to be shared outside Gazelle’s organization and peer groups or contractually bounded business partners.
Press	Requests from press and other media outlets need to be directed to our communications department.



9 IT usage, safety & data privacy

Equipment	Employees are provided with IT equipment (Hardware, Software, Devices, Tooling, etc.) which remain in the ownership of Gazelle and are aimed to fulfil the sole purpose to serve work and tasks in association with Gazelle.
Risk Exposure	Equipment needs to be kept free of external harm through reducing risk exposure and smart decision making on usage of Applications, Email Communication, Cloud Solutions, and other software communicating with non-Gazelle owned IT infrastructure and property.
Protect	Do not leave any equipment unattended in public spaces, restrict access to others (password protection, usage of mobile hotspot instead of public WLans, etc.). Use extra precaution with links provided in Emails from outside Gazelle's organization (Phishing).
Downloads	Restrain from downloads if content of download is not work related. This includes the usage of Applications and other software tools.
Safety	In case of doubt choose safety first and check back with our IT department or ask external provider of data to make it accessible to you in a more secure way.
Data Privacy	At Gazelle we follow General Data Protection Rules (GDPR) a regulation established by the European Union (EU) applicable to the European Economic Area (EEA) to protect privacy and human rights. Find out more about our Data Governance Policies and Regulations.

10 Environmental protection

Carbon Zero	Our product solutions significantly reduce underwater noise and generates much less impact on marine life than current offshore wind power plants. We are working on continuing these efforts causing little impact to the environment. Carbon zero is not just a buzz word to us. We also live it by reducing our own office environmental impact wherever possible.
Action	At Gazelle we participate actively in reducing our business operations environmental footprint by following highest waste management standards and recycling guidelines and encourage a paper free workspace, while also



minimizing emissions by reducing commuting and encouraging virtual meeting practice.

11 Report

Report We encourage you to report any concerns or in case of uncertainty seek clarification.

To continuously improve our compliance standards and policies, we also ask you to provide us with insights on what we can do better.

You can connect with us ombuds person directly (compliance@gazellewindpower) or speak to your manager.

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. We are taking every single report very serious and are hopeful we can develop better as an organization.



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