

CODE OF CONDUCT

enexion
group



Code of Conduct

Introduction

Enexion Group, founded in 2002 in Frankfurt, Germany, is a consultancy firm with over 20 years of global experience in the energy, decarbonization (low carbon), and sustainability sectors. Our company is committed to the highest standards of integrity, sustainability, and social responsibility in all our business operations and relationships. The Enexion Group Code of Conduct ("Code") defines the principles and expected standards that guide our business practices. These principles emphasize ethical behavior, compliance with applicable laws, and respect for all stakeholders, including employees, clients, partners, and the communities we serve.

Enexion Group ensures full compliance with all applicable laws and regulations in every geography where we operate and is dedicated to cooperating with regulatory authorities enforcing these laws. In this context, we commit to compliance with national and international regulations, including but not limited to the United Nations Global Compact, the European Convention on Human Rights, the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization (ILO) Declaration on Social Justice for Fair Globalization.

All our decisions and actions are grounded in fairness, transparency, and ethical values, aiming to build trust and deliver long-term value for all stakeholders. As a leading consultancy in energy and decarbonization, sustainability is at the core of Enexion Group's operations. We actively promote low-carbon solutions and sustainable practices both internally and in collaboration with our partners.

Enexion Group expects our suppliers, subcontractors, and business partners adhere to similar standards. It is essential that all parties we work with share our commitment to ethical conduct, respect for human rights, and environmental sustainability.

Overview

The Code of Conduct reflects Enexion Group's core values and establishes the principles that guide our actions and decisions as a company. It articulates our unwavering commitment to ethical, sustainable, and responsible business practices. The Code outlines the expectations and obligations that Enexion Group upholds in relation to the following areas:

1. Ethics and integrity
2. Data privacy and security
3. Inclusion and diversity

4. Employment, working conditions, and human rights
5. Wellbeing, health, and safety
6. Environmental sustainability

Code of Conduct

Ethics and Integrity

Anti-Bribery and Anti-Corruption

Enexion Group is firmly committed to conducting business with integrity and in full compliance with all applicable anti-bribery and anti-corruption laws. We uphold the highest ethical standards, ensuring that all our operations are free from any form of corrupt practices. Bribery, facilitation payments, and any form of corruption are strictly prohibited in all aspects of our business activities.

Gifts and Entertainment

Enexion Group prohibits the offering, accepting, or exchanging of gifts or items of value that could influence business decisions or provide an unfair advantage. This includes gifts intended to secure privileges for Enexion Group or any third party. The definition of “gifts” is broad and includes benefits, fees, commissions, cash, services, or other forms of incentives. All interactions must align with our commitment to fairness, transparency, and ethical conduct.

Non-Retaliation for Reports of Concern

Enexion Group promotes a culture of openness and accountability, ensuring that all employees and stakeholders can report workplace concerns without fear of retaliation. We have established a clear and transparent reporting process that protects individuals who report concerns or participate in related investigations. This framework encourages addressing and resolving workplace issues in a manner that upholds trust, fairness, and integrity across the organization.

Trade and Sanctions

Enexion Group fully complies with all applicable trade and sanctions laws and regulations. We are committed to adhering to international trade laws, ensuring that all our business practices are conducted legally and ethically. This dedication reinforces our mission to promote fairness and sustainability in the global business environment.

Data Privacy and Security

Enexion Group is committed to safeguarding the security and privacy of individuals, including employees, customers, business partners, and the protection of confidential assets and information. We uphold the highest standards to ensure the confidentiality, integrity, and availability of sensitive information.

Confidential Assets and Information

Enexion Group is dedicated to protecting the confidential assets and information of its clients, employees, and partners. Robust processes and systems are in place to ensure appropriate safeguards for sensitive information and to prevent unauthorized access or misuse.

Personal Information and Privacy

Enexion Group complies fully with all applicable laws and regulations regarding personal data protection. Personal information provided to or processed by Enexion Group is used, accessed, and disclosed strictly in accordance with legal requirements and company policies to maintain trust and transparency.

Inclusion and Diversity

Enexion Group fosters an inclusive culture and celebrates diversity as a key driver of innovation and success. We are committed to ensuring that discrimination of any form has no place in our organization or practices.

Non-discrimination and Workplace Diversity

Enexion Group adheres to all applicable laws and regulations related to non-discrimination and workplace diversity. We maintain workplaces that are free of unequal treatment, harassment, victimization, and abuse on any grounds, including but not limited to age, gender, race, disability, religion, or sexual orientation. Equal remuneration for work of equal value is a fundamental principle of our operations.

Supplier Diversity

Enexion Group recognizes that diversity and inclusion are essential to driving innovation, fostering economic growth, and enhancing resilience across business ecosystems. As part of our commitment to these principles, we actively seek to establish relationships with diverse and underrepresented businesses.

Enexion Group ensures that its procurement processes are fair, transparent, and accessible to businesses of all sizes and backgrounds. We require unbiased search and assessment processes in our sourcing activities and mandate that all stakeholders involved in procurement provide diverse businesses with equitable opportunities to compete for bids.

Beyond compliance, Enexion Group aims to cultivate long-term partnerships with diverse suppliers by fostering their growth and development. We encourage and prioritize the inclusion of diverse suppliers within our own operations and support them in gaining access to additional business opportunities throughout our value chain.

Employment, Working Conditions and Human Rights

Enexion Group is dedicated to upholding established principles regarding human rights, labor, environment, and anti-corruption, as outlined by the United Nations. We commit to these values in our operations and expect the same commitment across our partnerships.

Child Labor

Enexion Group strictly prohibits any form of child labor. The term "child" refers to any person under the age of 15 or who has not completed compulsory education, unless otherwise specified by applicable laws. The employment of workers under the age of 18 in hazardous work is also not acceptable.

Forced Labor

Enexion Group strictly prohibits any form of forced labor, which includes any work or service performed under threat or coercion, or where individuals are not free to leave their employment without penalty. We are committed to ensuring that all work conducted under Enexion's operations, directly or indirectly, is voluntary and carried out under lawful conditions. Any practice that forces individuals into work through the use of force, intimidation, or economic coercion is unacceptable.

Freedom of Association and the Effective Recognition of the Right to Collective Bargaining

Enexion Group upholds and respects the rights of employees and stakeholders to freely associate, organize, and collectively bargain, in accordance with applicable laws and international standards. We recognize that freedom of association is fundamental to fostering an inclusive, respectful, and equitable workplace.

All employees and stakeholders have the right to join or form organizations of their choice without fear of retaliation, discrimination, or harassment. Similarly, employees have the right to engage in collective bargaining to address and negotiate working conditions, wages, and other employment-

related matters. Enexion Group actively supports open dialogue between management and employees to ensure concerns are addressed constructively and fairly.

Freedom of Expression

Enexion Group recognizes and respects the fundamental right to freedom of expression, both within the organization and in its external relationships. We support the right of individuals to express their opinions, beliefs, and concerns freely, provided that these expressions are conducted respectfully and do not infringe on the rights or safety of others. Enexion Group fosters an open, transparent environment where employees and partners can voice their thoughts and concerns without fear of retaliation, discrimination, or censorship. We encourage dialogue, feedback, and constructive criticism as integral components of a thriving and innovative organization.

Human Rights

Enexion Group is deeply committed to respecting and promoting human rights in all aspects of its operations, adhering to the principles outlined in the Universal Declaration of Human Rights and relevant international standards. We strive to create and maintain a respectful, inclusive, and safe working environment where all individuals are treated with dignity, fairness, and equality.

Enexion Group explicitly prohibits all forms of physical violence, threats, coercion, harassment, discrimination, and any other behavior that undermines the well-being and integrity of individuals. This commitment extends to ensuring that no employee, contractor, or partner is subject to bullying, verbal abuse, mental or physical coercion, or disrespectful treatment in any form.

We actively promote practices that foster mutual respect and understanding across diverse cultures and backgrounds, emphasizing that every individual has the right to feel safe and valued within our organization. This includes implementing robust grievance mechanisms that allow employees and stakeholders to report concerns related to human rights violations confidentially and without fear of retaliation.

Through regular training, assessments, and transparent communication, Enexion Group aims to build a workplace culture that not only complies with legal obligations but also upholds the moral responsibility to respect and protect the rights of every individual, fostering trust and inclusion at every level.

Employment Laws

Enexion Group complies with all applicable wage and labor laws, ensuring fair remuneration and lawful practices in all forms of workforce engagement. We provide timely and clear wage notifications to all employees.

Recruitment or Use of Private or Public Security Forces

Enexion Group ensures that any private or public security forces engaged for protection are instructed and supervised to uphold human rights, prevent any form of abuse or harm and infringement on workers' freedom of association

Well-being, Health, and Safety

Enexion Group prioritizes the health and safety of all individuals involved in its operations. We adopt practices that minimize risks, promote accident prevention, and ensure safe working conditions.

Health and Safety

Enexion complies with all applicable health and safety regulations and strives to exceed these standards by implementing proactive measures to create a safe and supportive work environment for employees, contractors, and visitors.

Environmental Sustainability

Enexion Group is committed to reducing the environmental impact of its operations and actively seeks to contribute to global sustainability efforts.

Climate Change

Enexion Group acknowledges the urgent need to address climate change and actively incorporates climate action into its services. Through our consultancy services, we provide actionable strategies to mitigate greenhouse gas emissions, improve energy efficiency, and integrate low-carbon technologies into business operations. We are committed to supporting our clients in their efforts to adapt to climate change while striving for sustainable business growth.

Water

Enexion Group is committed to promoting responsible water use and conservation. While our consultancy operations do not directly involve water usage, we advise clients on best practices for managing water resources efficiently. We support businesses in implementing strategies that reduce water consumption, promote water recycling, and ensure sustainable water management across their operations.

Energy and Resource Use

Enexion Group is committed to advising clients on optimizing energy use and reducing overall resource consumption. We work with organizations to improve energy efficiency, transition to renewable energy sources, and reduce dependence on non-renewable resources. Our goal is to help businesses adopt practices that enhance resource efficiency, reduce costs, and minimize environmental impact.

Environmental Footprint

Enexion Group is deeply committed to minimizing its environmental impact and integrating sustainable practices into every facet of our operations. Our goal is to contribute to the long-term health and sustainability of the planet, reduce our carbon footprint, and actively work to preserve natural resources. We recognize the significance of environmental responsibility and require all employees, contractors, and suppliers to share in this commitment.

Compliance with the Law

Enexion Group has adopted a working style that is respectful to "individuals, environment, people, nature, and laws" in line with its goal of being a globally respectful company and respects the values protected by these rules. Enexion Group is obliged to comply with all applicable laws, regulations, rules, and agreements in all regions where it operates, especially those related to its products and services.