



## Code of Conduct of Hanse Windkraft GmbH

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## Introduction

Our services are an essential base for the energy transition. We work on solutions to major challenges of our time and assume responsibility for people, resources and the environment. Responsible behavior and integrity are key prerequisites for our business success and appreciated by our business partners and customers. By aligning our actions to high ethical and legal standards, we create a spirit of trust, avoid conflict situations and protect the reputation of our company. Compliance, i.e. adherence to statutory regulations as well as internal corporate policies, is thus of great importance for Hanse Windkraft GmbH.

This code of conduct contains binding rules and principles for legally compliant, ethical, and responsible conduct by the management and employees of Hanse Windkraft GmbH. Each individual is personally responsible for adhering to the rules outlined below. Management and executives serve as role models in this regard.

A code of conduct can never provide definitive answers for every situation. In case of doubt, please contact your direct supervisor.



Christoph Dany  
Managing Director



Felix Marquardt  
Managing Director

## 1. Scope of application and objective

This code of conduct applies to the entire Hanse Windkraft GmbH (hereinafter also called "Hanse Windkraft"). As a company policy, the code of conduct contains the fundamental rules of conduct that must be observed by all employees and members of the management board of Hanse Windkraft. It represents the overarching compliance framework and is further specified by subordinate regulations such as guidelines or company agreements.

## 2. Principles of conduct

### 2.1. We respect the law

Laws, regulations and comparable instruments as well as internal regulations apply to the Hanse Windkraft and their employees in all areas of their business activities. The Hanse Windkraft are committed to unqualified compliance with legal requirements. Employees are obliged to observe all laws applicable to their areas of responsibility as well as external and internal guidelines.

### 2.2. We draw attention to violations of laws and rules

All employees are called upon to report potential violations of laws and rules to their line manager or the contact responsible in the company.

In addition, employees, business partners, customers, suppliers and other third parties can draw attention to potential violations via the whistleblower system of the Stadtwerke München GmbH in the event of the suspicion of illegal business practices such as corruption, fraud, embezzlement, violations of antitrust law or similar infringements in relation to the Hanse Windkraft. To submit such information, the Governance and Compliance unit (internal whistleblower contact) at Stadtwerke München GmbH or, alternatively, an attorney who has been appointed as an external ombudsman can be contacted to report possible violations.

#### CASE STUDY

You see a colleague repeatedly violate internal Hanse Windkraft guidelines and applicable legislation. You suspect that your line manager turns a blind eye to such conduct and would thus prefer to neither directly confront your colleague nor report your observations to your line manager.

#### WHAT SHOULD YOU DO IN SUCH A SITUATION?

Resort to the whistleblower system in place at Stadtwerke München GmbH and report the incident as laid down in the applicable guidelines.

### 2.3. We assume responsibility for compliance with rules and regulations

All employees are personally responsible for compliance with rules and regulations in their areas of responsibility. Expert advice shall be obtained if doubts arise with respect to their own or another individual's behaviour.

All managers are role models and shall align their actions particularly to the principles laid down in this Code of Conduct. They promote compliance with rules and regulations on the part of their employees by providing

regular information and training with respect to the duties and powers relevant to their line of work. Within the Framework of their leadership tasks, managers take precautions to prevent unacceptable behaviour. In their respective sphere of responsibility, managers are responsible for preventing violations of rules that might have been averted or impeded through proper organisation or supervision. In the event of violations, they implement the measures required in the case in question (section 7).

#### **2.4. We act in the interests and for the benefit of the Hanse Windkraft**

All employees gear their actions to the interests and benefit of the Hanse Windkraft. We always handle the assets of the Hanse Windkraft carefully and economically and safeguard the financial interests of the Hanse Windkraft (e.g. with regard to the assertion of legal and contractual claims, incurrance of obligations by the Hanse Windkraft or the provision of services and payments by Hanse Windkraft). The interests of the Hanse Windkraft take precedence over the interests of individual companies, business or organisational units. Favouring individual units at the expense of others is permissible only if this is beneficial for the Hanse Windkraft as a whole. Decisions regarding the economic efficiency of measures that affect other organisational units must also take the relevant follow-up costs for the other organisational units into account. In addition, we are duty bound to our owner, the Stadtwerke München GmbH. We respect and uphold the group-wide decisions and decision-making processes. We consider the interests of the Stadtwerke München GmbH.

#### **2.5. We adopt a cooperative and partnership-oriented approach**

Across all units and hierarchies, dealings with each other are characterised by mutual esteem, collegiality, team spirit, professionalism and benevolence. The personal dignity, privacy and personal rights of each individual shall be respected. This also applies to employee behaviour towards external parties. Discrimination, harassment and insulting behaviour are unacceptable and will not be tolerated. Discrimination of employees or job applicants based on ethnic origin, social origin, skin colour, nationality, gender, religion or world view, disability, age or sexual identity is impermissible.

The statutory regulations on working time and freedom of association, the right to collective bargaining and the statutory vacation, sickness and termination regulations are observed. Agreed minimum wages and social standards are not undercut. The laws regarding the prohibition of child labour are observed.

Trust-based and close cooperation with the employee representatives, shaped by an open and constructive dialogue and mutual respect, is a key element of our corporate policy. Corporate co-determination is respected.

We also demand of our business partners that they respect human rights, ensure compliance with internationally recognised standards of labour and employee Rights and ensure fair working conditions. We reinforce this approach with suitable processes and procurement strategies.

#### **2.6. We take decisions with the requisite diligence**

Decisions in the company are taken with the necessary requisite diligence. This means that decisions shall be prepared properly, taking account of all relevant decisionmaking options and their implications. Decisions shall be geared to the benefit of the Hanse Windkraft and shall not be determined by inappropriate influences and Special interests. In the preparation of decisions, all requisite information on the relevant aspects shall be obtained, suitable involvement of all relevant internal functions or contacts shall be ensured, and their professional opinions shall be taken into account.

**CASE STUDY**

An employee is preparing to submit a major order. Due to his upcoming vacation, he is under considerable time pressure. He no longer has time to clarify tax-law and compliance-relevant issues of possible significance for order Submission with the competent persons prior to commencement of his vacation. He is relying on his experience and is of the opinion that consultation with his colleagues would not change the outcome in any way and would thus be a mere formality.

**IS THE EMPLOYEE ALLOWED TO SUBMIT THE ORDER WITHOUT INVOLVEMENT OF THE COMPETENT PERSONS?**

No. The employee must always clarify all issues relevant for the decisionmaking process in advance with the competent persons and involve these individuals in the process. To that extent, it does not matter whether or not their involvement would change the outcome in a specific case.

**2.7. We acknowledge our responsibility for the environment and society**

In the context of our business activities, we consider the effects on humans, the environment, nature and society. We campaign for environmentally friendly and healthy measures and expect the same of our business partners in the supply chain. Suitable procurement strategies and purchasing practices help us to consider sustainability in the supply chain as well.

**3. Use of the assets and property of the Hanse Windkraft**

The business assets and property of the Hanse Windkraft such as vehicles, tools, spare parts, office supplies, documents, computers, printers, copiers and data storage devices may be used for business purposes only and shall not be removed from the company's premises unless otherwise laid down in internal Hanse Windkraft policies. Employees are obliged to protect the property of the Hanse Windkraft against loss, theft and misuse.

**CASE STUDY**

An employee is preparing a lecture he will hold outside his working hours. He prints out the handouts for the private event at the expense of the Hanse Windkraft. For enhanced presentation of his documents, he takes a beamer owned by Hanse Windkraft home with him.

**IS THIS EMPLOYEE ACTING CORRECTLY?**

No. The employee is using and removing business assets of the Hanse Windkraft for purely private purposes. Unless Hanse Windkraft has expressly permitted this, the employee is violating the applicable Code of Conduct and, hence, his duties under his employment contract.

**4. Conflicts of interest****4.1. We avoid conflicts of interest**

Employees' private interests shall be separated from the company's interests in order to avoid potential conflicts of interest. Such conflicts arise when employees pursue their own activities or personal interests to the detriment of the interests of the Hanse Windkraft. Employees shall disclose all personal interests that

might relate to the performance of their professional tasks to their line manager in writing. Conflicts of interest can arise not only when personal interests are affected. The interests of relatives or other affiliated persons shall also be taken into account.

Work/private life balance and the assertion of employee rights arising from the law, collective-bargaining agreements, works agreements or employment contracts remain unaffected by this. In particular, the following regulations shall be observed.

#### **4.2. We do not place private orders with companies we deal with within the framework of our professional work for the Hanse Windkraft**

Employees shall not place private orders with companies they deal with professionally in their work for the Hanse Windkraft to perform private services and shall not do so via relatives<sup>1</sup> or affiliated persons<sup>2</sup>. This applies, in particular, if the employee in question has or may have a direct or indirect influence on contracts with the company on behalf of the Hanse Windkraft.

This rule does not apply to transactions satisfying everyday needs conducted at normal market conditions (i.e. at conditions that are no better for employees of the Hanse Windkraft due to their specific activity for the SWM companies than for other persons). If orders are necessary or advisable in exceptional cases, employees shall notify their line manager in writing. If employees hold direct or indirect participations in the corporate assets of a business partner of a Hanse Windkraft company or perform activities for a business partner of a Hanse Windkraft company (e.g. as a consultant, managing director or supervisory board member), they shall report this to the HR department in writing if they deal with the company in question within the framework of their

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<sup>1</sup> In particular: spouses, life partners/partners in a long-term relationship, parents, parents-in-law, step-parents, children, children-in-law, step-children, siblings, half siblings, step-siblings.

<sup>2</sup> Other persons living in a common household or other persons with whom there is a close personal and/or economic relationship.

professional activities at the Hanse Windkraft. For listed companies, a participation within the above meaning will be deemed to exist only if the shareholding exceeds one per cent of said company's share capital.

#### **CASE STUDY**

An Hanse Windkraft employee is responsible for placing orders with tinsmith companies. Among other things, he is in constant contact with the Hamburg-based XY tinsmith company, which he holds in very high regard. When the roof of his private garage is damaged, he urgently needs a tinsmith to repair it.

#### **IS THE EMPLOYEE ALLOWED TO PLACE THE ORDER FOR THE REPAIR OF HIS PRIVATE GARAGE ROOF WITH THE XY TINSMITH COMPANY?**

No. The employee's private interests and the company's interests must be kept separate in order to avoid potential conflicts of interest. If this is an exceptional case in which the order must be placed specifically with the XY tinsmith company (e.g. because the repair work is very urgent and no other comparable company is available), the employee must notify his line Manager to this effect.

#### **4.3. We and our relatives do not enter into entrepreneurial Business relations with the Hanse Windkraft**

Employees are not allowed to offer their own or their relatives' entrepreneurial business activities to Hanse Windkraft or perform such activities for Hanse Windkraft. Exceptions shall be based on objective grounds and require the approval of the competent first-level manager. If an exceptional permission is granted, steps shall be taken to ensure that the individual in question does not have any actual or potential influence on the contracting of the third-party company or contract design, the specification of the service to be provided by the third-party company, Performance assessment or service billing.

#### **CASE STUDY**

You are preparing a major marketing campaign for Hanse Windkraft and are under considerable time pressure. Shortly before completion, an external agency informs you that they will be unable to make their contribution to the Project due to insolvency. The work assigned to this agency requires such specialist expertise that it could take weeks to find a new agency. Your brother runs a business that could perform this service immediately, which would allow you to finish the project on time.

#### **CAN YOU ASSIGN THIS JOB TO YOUR BROTHER'S COMPANY?**

If you conclude a contract with your brother for performance of this service, you might create the impression of bias in order placement due to your family ties. You should thus notify your line manager of this situation and ask to be relieved of the decision to select the new agency. This will help avoid creating the impression of a conflict of interests.

#### 4.4. We do not compete with the Hanse Windkraft

Management of or work for a company directly competing with Hanse Windkraft is prohibited unless one of the Hanse Windkraft holds a direct or indirect participation in the company in question. This also applies to secondary professional activities that might create a competition situation for the Hanse Windkraft. Direct or indirect participation in a competitor shall be reported in writing to the HR Department if the shareholding exceeds one per cent of said company's share capital.

#### CASE STUDY

An employee working for Hanse Windkraft privately manages a Business with several staff members. He operates this business with the intention of making a profit, and the business purpose of his company is identical to that of a business unit in the Hanse Windkraft for which the Hanse Windkraft employee works. The Hanse Windkraft has not approved the pursuit of this directly competing activity. The employee would now also like to win customers of the Hanse Windkraft with whom he is in contact for his private business.

#### IS THE EMPLOYEE ALLOWED TO OFFER CUSTOMERS THE SAME SERVICES THROUGH HIS PRIVATE BUSINESS?

No. The very management of a competing business is already a Violation of the applicable Code of Conduct. Enticing customers away from the Hanse Windkraft would thus be an even more serious breach of duty.

#### 4.5. We do not use Insider information for private purposes

Employees are not allowed to use nonpublic information they obtain within the framework of their work for the Hanse Windkraft to gain financial or business advantages for themselves or third parties.

#### 4.6. We notify the Hanse Windkraft in writing of any remunerated secondary occupations and comply with the guidelines

The Hanse Windkraft shall be notified in writing of any remunerated secondary occupation in good time prior to its pursuit. Such secondary occupation shall not be likely to impede the fulfilment of employees' duties under their employment contract or the justified interests of the Hanse Windkraft. As a basic principle, the use and deployment of Hanse Windkraft companies' material, facilities and staff for a secondary occupation and the latter's pursuit during working hours are not allowed.

Activities related to employees' work at the Hanse Windkraft or pursued at the Hanse Windkraft behest are not considered to be secondary occupations within the meaning of the above paragraph. Employees receiving fees or other benefits for lectures, publications, public appearances or comparable activities in such cases shall notify their line Managers of these payments in writing. All resultant remuneration shall be passed on to the Hanse Windkraft unless otherwise agreed with the Hanse Windkraft or other regulations apply.

**CASE STUDY**

An employee holds a lecture on a technical topic at a symposium at the behest of Hanse Windkraft and receives a fee for this lecture. He knows that other speakers at this symposium use their respective fees for private purposes. The Hanse Windkraft employee, too, would like to keep the fee for his private use.

**CAN THE EMPLOYEE KEEP THE FEE FOR HIS PRIVATE USE?**

No. If an employee receives a fee, as is the case here, he must notify his line manager of this payment. Unless otherwise agreed with Hanse Windkraft, the employee must pass on the fee to Hanse Windkraft.

**4.7. We avoid decisions relating to relatives**

Decisions by employees relating to relatives shall be avoided in the context of their work at the Hanse Windkraft, and if they are necessary, the line manager shall be notified in writing in good time.

Corresponding conflicts of interest in the employment relationship (e.g. line and specialist management with regard to relatives) shall be resolved by separating the spheres (e.g. termination of the disciplinary and/or specialist management).

**4.8. We maintain a distance from business relationships with (former) employees**

Conflicts of interest may arise if employees switch or have already switched to an existing business partner of Hanse Windkraft and/or to a company affiliated with the Hanse Windkraft within the meaning of Section 15 German Stock Corporation Act (Aktengesetz – AktG) and in their new function could supervise and/or influence business transactions with the Hanse Windkraft in which they were already professionally involved during their employment at the Hanse Windkraft. The same applies if employees become or have become self-employed and are to become a Business partner of Hanse Windkraft.

If Hanse Windkraft become aware of one of the constellations described in the above paragraph, the Hanse Windkraft shall generally observe a waiting period of one year (cooling-off period) before (re)placing orders with this business partner. This applies, provided compliance with the cooling-off period is permitted by law and there are no contradictory substantial operational reasons.

**CASE STUDY**

A long-standing IT employee of Hanse Windkraft resigns and becomes self-employed. The position cannot be filled at short notice. As some projects in your department urgently need to be completed, another colleague suggests transferring parts of the project to the now self-employed former colleague. He argues that the former colleague is an outstanding expert and knows the processes at Hanse Windkraft very well.

**CAN THE FORMER EMPLOYEE BE ASSIGNED TO AN IT PROJECT AT SHORT NOTICE?**

No. In principle, a waiting period of one year must be observed. In the present case, it is not apparent that there is a need to deviate from this principle for legal or important operational reasons.

## 5. Dealing with customers, business partners and other third parties

### 5.1. We do not tolerate corruption or other unfair business practices

The Hanse Windkraft do not tolerate corruption or other unfair business practices. Both giving and accepting benefits with a view to influencing decisions is prohibited and subject to penalties. In dealing with business partners<sup>3</sup> and competitors<sup>4</sup> as well as public authorities, employees may accept or grant benefits only if it can be ruled out that such action may create the impression that decisions have been influenced as a result.

#### CASE STUDY

For his birthday, an Hanse Windkraft employee receives tickets to a soccer game worth EUR 65 from a business partner as a token of gratitude for good cooperation. This small gift is intended to have a favourable impact on the upcoming contractual negotiations on an extension of the business relationship.

#### HOW SHOULD YOU RESPOND IN SUCH A SITUATION?

You should reject the gift, with thanks, and explain politely that its acceptance would violate both the Code of Conduct applicable at Hanse Windkraft and the secondary guideline governing the handling of benefits.

### 5.2. We compete fairly and comply with the applicable legislation

The Hanse Windkraft compete fairly and comply with the applicable legislation. Violations may lead to severe penalties for the Hanse Windkraft and the individuals involved. Heavy fines can be imposed on companies. In addition, high compensation payments may be stipulated in the context of civil action.

All business transactions are conducted in compliance with the applicable anti-trust legislation. In particular, unacceptable behaviour includes express or tacit formal or informal collusion, agreements, coordination or exchange of information with competitors about aspects relevant to competition such as prices, pricing structures, price components and other terms and conditions, market, customer or territory allocations, orders and order intakes, capacities, output volumes and production quotas and future market behaviour.

Anti-trust regulations dealing with further anti-competitive actions and conduct, such as vertical restrictions of competition or abuse of a dominant position, are very complex. For this reason, the Legal Department shall be consulted in advance if an agreement might entail any form of restriction of competition.

### 5.3. We pursue a transparent and verifiable approach to donations and sponsorship

The Hanse Windkraft also show their commitment through sponsorship activities and donations on a limited scale. The following principles shall be observed in this context.

The awarding of a donation shall be transparent and documented. Donations shall be made only on a voluntary basis and without expectation of a service in return. They may be made only to institutions for the promotion of education and science, art and culture and to social causes and other recognised charities. Donations to political parties are not permitted.

<sup>3</sup> Business partners include customers, suppliers and service providers as well as third parties with whom such business relations are intended to be established.

<sup>4</sup> Competitors are companies that either compete or can compete with Hanse Windkraft on individual markets.

Sponsorship<sup>5</sup> is based on the principle of performance and consideration and presupposes actions characterised by responsibility, appropriateness and transparency. Sponsorship activities may be pursued only for bona fide business purposes, shall be in reasonable proportion to the counter-performance granted by the recipient and laid down in a written agreement. Sponsorship shall not create the impression that undue influence is being exerted on the recipient with respect to negotiations or decisions.

#### CASE STUDY

An employee of Hanse Windkraft is an enthusiastic softball player in a small club in the greater Hamburg area. As the club's changing rooms are in urgent need of renovation and her team needs new jerseys, she wonders whether Hanse Windkraft might be a possible sponsor. Hanse Windkraft could cover the costs of the renovation and the jerseys and should be given the opportunity to put the Hanse Windkraft logo on the jerseys, for example.

#### CAN SWM BECOME A SPONSOR FOR A SOFTBALL CLUB?

Sponsorship activities must be proportionate to the consideration provided by the sponsor. In this case, the costs for the renovation are likely to be significantly higher than the consideration that Hanse Windkraft would receive from the club (e.g. naming of Hanse Windkraft on the jerseys). Sponsorship is therefore not possible here.

#### 5.4. We examine any concessions very carefully

The granting of full or partial waivers, the performance of a service going beyond what has been agreed contractually or is stipulated by law (overfulfillment), and the conclusion of settlements on behalf of Hanse Windkraft require the following conditions to be fulfilled and compliance therewith suitably documented:

- acting exclusively in the interest or for the benefit of the Hanse Windkraft
- acting on the basis of adequate information
- weighing all aspects and options for action that are relevant for the decision
- acting without special interests and inappropriate influences
- involving all relevant specialist contacts to the extent necessary or Expedient and consideration of their pertinent expert opinions

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<sup>5</sup> Sponsorship is defined as gifts of cash or in-kind goods or services made by a legal entity or individual with economic interests that pursues other interests in addition to advancing the recipient. The sponsor aims at shaping its profile with the public through the sponsored product or dissemination of its advertising messages, which serve the purpose of achieving the sponsor's own communication objectives (image enhancement, sales promotion, product information).

Full or partial waivers and settlements with a value in dispute of up to EUR 250,000 granted or concluded on behalf of Hanse Windkraft are subject to prior approval of the competent line manager of the employee involved. For amounts that exceed this value, the corresponding regulations shall be observed.

### CASE STUDY

A new building has been constructed for Hanse Windkraft. Upon completion of the construction work, defects resulting from faulty services of the contractor company are detected. Without further review, the Hanse Windkraft employees responsible for this project would like to waive all warranty claims within the Framework of a settlement in order to avoid any negative impact on the good Relations that have existed for many years between the contractor and Hanse Windkraft.

### IS THIS POSSIBLE?

No. The employees must ensure that the prerequisites laid down in the Code of Conduct are fulfilled and their compliance is documented appropriately. This requires careful review on the part of the employees. In particular, they must consider all aspects and options relevant for the decision and obtain and take account of pertinent expert opinions from specialists in the area.

### 5.5. We conclude consulting Agreements only if the fee is reasonable for the services to be performed

Consulting agreements may be concluded only with individuals or firms whose expertise demonstrably contributes to the further development of the Hanse Windkraft. The fee level shall be reasonable for the value of the service to be rendered and the consultant's personal qualifications. As a basic principle, payments are not effected until the agreed service has been performed. If consultants are engaged in connection with the placement of orders with third parties, they shall not be granted any decision-making powers with respect to the decision to place such orders. If a consultant is mandated with establishing business relations with a third party on behalf of the Hanse Windkraft, a suitable contractual agreement shall be drawn up to ensure that the consultant adheres to the Hanse Windkraft compliance standards.

## 6. Handling of information

### 6.1. We observe our confidentiality obligations

Employees are obliged to maintain secrecy regarding all Hanse Windkraft matters of a confidential nature and regarding all confidential information from or relating to our business partners and customers. Information is confidential if it is marked as such or if it may be assumed to be outside the public domain and not intended to be made public, e.g. because it might be of use to competitors or potential suppliers or harm the Hanse Windkraft if it were published. Only explicitly authorised individuals are allowed to communicate information relating to the Hanse Windkraft or their business partners to the public or third parties. In case of doubt, internal Information shall always be treated confidentially in dealings with third parties.

**CASE STUDY**

In the development process of a certain product at Hanse Windkraft, an employee has prepared a presentation on the insights gained, the remaining development stages and strategies. This is confidential information outside the public domain and not intended to be made public. One of the employee's private acquaintances is quite coincidentally writing a doctoral thesis on a similar Topic and asks the employee to show him the presentation. The employee is willing to allow him to take a look at the document; after all, his acquaintance is not a competitor of SWM and the information would be passed on only for scientific purposes.

**SHOULD YOU SHARE THE EMPLOYEE'S OPINION?**

No. Unless otherwise agreed with Hanse Windkraft, confidential information must not be passed on under any circumstances, irrespective of the specific reason.

**6.2. We collect, process and use personal data only if permitted**

Employees shall be obliged to comply with the applicable data protection regulations. Personal data may be collected, processed and used only insofar as this is necessary for clearly defined and legitimate purposes. In addition, personal data shall be stored securely and be passed on only if the necessary precautionary measures are taken. The use of data shall be transparent to the persons affected. Their rights shall be safeguarded.

**CASE STUDY**

In a full underground train, you read aloud from a customer contract (e.g. an electricity contract) over the phone. During your call, you quote customer data (e.g. name, address, phone number, e-mail address, current provider...) in a clearly audible manner. In addition, a passenger standing behind you can also read the contract.

**SHOULD YOU RECONSIDER YOUR CONDUCT?**

Yes. By talking about the client in a clearly audible manner as an Hanse Windkraft employee, you enable other passengers to gain knowledge of the customer data. Even if unintended, such disclosure of customer data to the other passengers is a breach of data protection law and a violation of the Code of Conduct.

**6.3. We respect the Independence of the media and politicians**

The Hanse Windkraft respect the professional independence of journalists and the media. Section 5.1 shall apply accordingly for the granting of benefits to journalists and other media representatives. The Hanse Windkraft adopt a politically neutral stance.

## CASE STUDY

In your function of Hanse Windkraft employee, you are invited to a dinner with a Panel discussion organised by a local Hamburg politician. This is a fundraiser for his party and thus requires the purchase of an expensive ticket.

### **YOU WOULD LIKE TO ATTEND THE DINNER AS YOU ARE INTERESTED IN THE TOPIC OF THE PANEL DISCUSSION. WHAT SHOULD YOU DO?**

Your dinner attendance might create the impression that Hanse Windkraft provides funds to the local politician in question and his party. You must be careful when it comes to accepting such invitations and consult your line Manager beforehand.

## **7. Compliance with the Code of Conduct and sanctions**

All members of management bodies and all employees of Hanse Windkraft are obliged to comply with this Code of Conduct. The managerial staff has a special responsibility for communicating and implementing the guidelines set out therein. Every employee is personally responsible for complying with this Code of Conduct. In cases of doubt about their own or a third party's conduct, every employee shall obtain competent advice.

Violations of this Code of Conduct may have consequences for the employment relationship and its continuation and may also lead to claims for damages. They may also entail consequences under criminal law.