ETHICS & COMPLIANCE POLICY

1. INTRODUCTION

This Policy sets forth POWERLINES Group GmbH's (hereinafter referred to as "**POWERLINES Group**") approach on **Compliance**. At POWERLINES Group, Compliance means observing all applicable laws, regulations, standards of good corporate governance, ethics and community expectations as a basis for the long-term success of **POWERLINES Group**.

Compliance and Integrity matters to everyone: All entities worldwide, including joint ventures, in which POWERLINES Group holds or will hold a controlling interest, irrespective of whether such participation is direct or indirect (each of which individually referred to as a "**POWERLINES Company**" and together referred to as "**POWERLINES**"), are required to apply this Policy and its principles.

Any violation of this Policy and its integrated annexes may not only cause severe sanctions (including fines and imprisonment) for the individual committing such violation but also fines and severe damages to POWERLINES Group and its reputation. Therefore, **POWERLINES Group does not tolerate** any violations of this Policy and its integrated annexes.

This Policy provides for **minimum standards** that shall be complied with wherever POWERLINES conducts business. In addition to compliance with this Policy, there may be stricter requirements under the laws of a respective country and jurisdiction in which POWERLINES operates. Such stricter requirements need to be complied with and shall be summarized in country specific annexes to this Policy, from time to time.

This Policy was adopted by POWERLINES Group's management board (hereinafter referred to as "**Group Management Board**") on 24.06.2025 and has entered into force on 24.06.2025 („**Effective Date**"). From the date of its effectiveness this Policy replaces the previous Policy from 2024 and shall apply, as amended from time to time, to any incidents occurring on or after the Effective Date.

2. SCOPE

Based on a compliance risk analysis, the Group Management Board has come to the conclusion that particularly persons whose accountabilities include direct or indirect involvement with external business partners on behalf of POWERLINES are relevant for the purposes of this Policy in light of the fact that their positions enable them to potentially expose POWERLINES to compliance risks. As a consequence, the Group Management Board has determined that the following persons need to adhere to this Policy, irrespective of the jurisdiction they operate in (without prejudice to stricter requirements that need to be complied with under local law), whereas such determination may be amended from time to time as deemed necessary by the Group Management Board:

(i) All relevant staff members of POWERLINES, meaning the members of the management, any white collar employees ("*Angestellter"/ "employee*") pursuant to the Austrian White Collar Employee's Act ("A*ngestelltengesetz*") or pursuant to the corresponding statutes under the applicable local law as well as any other staff members who are defined as relevant by the Group Management Board based on a proposal issued by the managing directors of the respective POWERLINES Company (hereinafter referred to as "**Local Managing Directors**") from time to time because they hold positions which enable them to noticeably expose POWERLINES to compliance risks as covered in this Policy (hereinafter together referred to as "**Relevant Staff**"), and.

(ii) Any persons associated with POWERLINES, who perform services for and on behalf of POWERLINES, including contractors, consultants, agency staff, and who are determined as relevant by the Group Management Board based on a proposal issued by the Local Managing Directors of the respective POWERLINES Company from time to time because they hold positions which enable them to noticeably expose POWERLINES to compliance risks as covered in this Policy (hereinafter referred to as "**Relevant Associated Persons**")..

To implement the aforementioned, POWERLINES will ensure that this Policy and its integrated Annexes (as well as any amendments thereto) will be brought to the attention of all of its Relevant Staff (in the form of a signed confirmation letter, see template in Attachment 1) and to the Relevant Associated Persons (in the form of compliance clauses as set forth in Attachment 3 hereto, to be included in third party contracts), insofar as the Group Management Board does not decide otherwise in individual cases. In addition, regular training of selected Relevant Staff (section 8) shall safeguard the awareness and responsibility of the staff members regarding compliance with this Policy.

This Policy and its integrated annexes, as amended from time to time, may be downloaded from the POWERLINES Group Website https://www.powerlines-group.com/en/ueber-uns/compliance-ethik/ as well as the POWERLINES Group intranet in the category "Forms and Templates/Compliance".

Non-compliance with this Policy will have consequences (as further set out in section 0), it may result in disciplinary action being taken and may even lead to termination of the employment contract, and/or the termination of a third party contract (as the case may be), with immediate effect.

Please help us to ensure adherence to this Policy: If you have sufficient reason to suspect any non-compliance with this Policy, please raise your concern to your superior who shall act in accordance with the 'Reporting violations' section below (for further details see section 10).

3. ABOUT THIS POLICY AND ITS ANNEXES

All operations and activities under POWERLINES' control shall be conducted in accordance with this Policy.

The integrated annexes to this Policy are:

- Policy for the Prevention of Antitrust Violations
- Policy for the Prevention of Corruption and Conflicts of Interest
- Guidelines for Dealing with Business Partners
- Country Annex Sweden and
- Country Annex UK

4. GENERAL ETHICAL APPROACH OF POWERLINES

In addition to minimising the specific compliance risks dealt with in this Policy and its Annexes, POWERLINES attaches great importance to observing the rules of respectful cooperation. **Honesty, integrity, respect and loyalty** shall characterise the way we deal with each other both within the company and between the companies of the POWERLINES Group as well as in our dealings with customers and business partners. Outside the daily work routine, this also means an active solidarity with the regional community in which POWERLINES operates as well as a responsible handling of resources and the environment. Even when dealing with competitors, the necessary respect must always be maintained in addition to the rules of competition and antitrust law (see the guidelines for avoiding antitrust violations). Denigration of competing companies is unacceptable and will not be tolerated by POWERLINES.

POWERLINES is aware of its responsibility towards its employees and all persons associated with POWERLINES, including contractors, consultants, agency staff and business partners.

POWERLINES' basic ethical principles are set out in more detail in Attachment 4 to this Directive. They are also available on the POWERLINES website (www.powerlines-group.com > Company > Ethics).

5. KEY COMPLIANCE RISKS AND KEY COMPLIANCE POLICIES

Based on a compliance risk analysis, taking into account the size of POWERLINES, its structure and complexity, the nature of POWERLINES' business and the location of POWERLINES' business operations, the Group Management Board has identified the following key compliance risks to be addressed in this Policy:

1. Corruption
2. Conflicts of interest
3. Misuse of company assets
4. Responsible Sourcing
5. Unfair competition and violation of antitrust regulations
6. Confidentiality and Data Protection
7. Insider Trading
8. Anti-Fraud Measures

9. Export Control
10. Human Resources, Employment and Remuneration
11. Health and Safety
12. Business Travel
13. Social Networks
14. Respectful Interaction within the workplace
15. Behaviour in the Business World
16. Commitment to Human Rights

In general it is prohibited to carry weapons, using drugs, gambling while at POWERLINES premises or working for POWERLINES in all settings, defrauding public bids and obstructing investigations done by authorities.

Each of these key compliance risks as well as some additional areas of particular concern to POWERLINES are described in more detail hereinafter, in the annexes hereto as well as in the mandatory POWERLINES compliance trainings.

5.1 CORRUPTION

POWERLINES is opposed to corruption and illegal practices in all their forms and shall not offer, pay or accept bribes (however defined, irrespective of whether the person offering or demanding such advantage is working in the public or in the private sector) or apply any illegal or unfair practices in its dealings with governments, foreign public officials or in the commercial market place. POWERLINES does not engage in any form of unethical inducement or payment. POWERLINES does not tolerate any such activity by its staff members and Associated Persons.

Donations to third parties must generally be customary and appropriate and must not pursue any unfair purpose. Furthermore, all donations exceeding a value of € 100 must be registered and are subject to approval by the local management.

A detailed outline of the rules applicable in this context can be found in the Guidelines on the Prevention of Corruption and Conflicts of Interest, which form an integral part of this Policy.

5.1.1 BRIBERY & GRANTING OR RECEIVING OF IMPROPER ADVANTAGES

POWERLINES and its representatives will not offer, give, or receive bribes or other improper advantages of any kind for any purpose, whether directly or through a third party, regardless of whether for the execution of a task in accordance with that person’s duties or contrary to that person’s duties and irrespective of whether in connection with a specific transaction for the benefit of POWERLINES or not.

5.1.2 FACILITATION PAYMENTS

Neither staff members nor Associated Persons working for POWERLINES shall make facilitation payments. Facilitation payments are minor amounts of money usually given to public officials in order to obtain or accelerate services of such persons to which one has a legal right (e.g. for passport control, customs clearance).

5.1.3 CHARITABLE DONATIONS, PATRONAGE AND SPONSORSHIPS

POWERLINES may support, sponsor and contribute to social and community activities that are aligned with POWERLINES' business objectives and values as well as international, national, and local regulations and standards. Such donations, patronages and social investments are carried out transparently and must not be made so as to create the perception of impropriety or unfair advantages in competition, in particular when dealing with public officials (including foreign public officials), politicians and others of influence. Therefore, no financing should ever take place during a suspicious period such as in connection with the opening of an invitation to tender. Before the donation is made, it must be verified that the donations are not disguised as illegal payments to government officials. All requests for charitable donations must be accompanied by a written description of the charity entity, including the names of the individuals contacted and any supporting documentation. Before authorising a payment to a charity, it should be confirmed that it is not an entity controlled by or benefiting from government officials or persons or entities associated with them. Prior to a donation or sponsorship, management approval must be obtained. It is of particular importance that we act transparently, ethically, and in good faith in all cases. In any case, donations in the form of gifts and sponsorships may not be used to circumvent our policies on accepting and granting gifts, the prohibition on bribes, and the like.

Details, including examples are set out in the POWERLINES Guidelines on Corruption Prevention.

5.2 CONFLICTS OF INTEREST

All staff members must ensure that their personal interests do not conflict with their duties vis-a-vis POWERLINES or its customers and business partners; actual or potential conflicts of interest, whether involving POWERLINES' employees or close relatives (spouse, civil partner, adult children or other close friends and/or relatives) have to be avoided. Any issues that may potentially conflict with the interests of POWERLINES must be reported to your competent superior. Transactions with a potential conflict of interest are permitted if they would also be concluded in the same form with an independent third party ("'arm's length"'). Transactions with a potential conflict of interest must therefore stand up to an "arm's length" comparison and must also be authorised in writing by the superior.

5.3 PROPER USE OF COMPANY ASSETS AND SUSTAINABILITY

5.3.1 MATERIAL AND IMMATERIAL ASSETS

All of POWERLINES' staff members are obliged to handle Company Assets responsibly and diligently and to protect them against loss, theft, misuse and access of third parties. The term Company Assets as used herein covers both real estate and other material assets (including phones, computers, cars, machines, tools, printers etc.) as well as immaterial assets (copyrights, patents, know how, trade secrets etc.).

In general, Company Assets may only be used for professional purposes (unless explicitly stated otherwise in a valid company directive or unless approved by the Local Managing Directors in writing).

In addition to the careful use of assets, POWERLINES also focuses on sustainability and environmental protection and always complies with the relevant laws, which must be met as a minimum standard in any case. Therefore, the proper disposal or permissible passing on (e.g. of old laptops to charitable organizations) of material assets as well as waste separation have high priority. POWERLINES also attaches great importance to regionality. Care must also be taken to ensure that resources are not wasted and that only as much is purchased as is actually consumed.

Sustainability means:

- responsible use of raw materials and resources;
- striving to minimize the environmental footprint emanating from facilities, products and projects;
- reducing environmental impacts on air, water and on land, and promoting appropriate measures, especially to reduce CO2 emissions;
- use of sustainable supply chains;
- responsible use of water;

5.3.2 DIGITAL ASSETS (“*CYBER ASSETS”*)

Guidelines for handling assets do not only apply to material assets or intellectual property, but also to digital assets in particular. In this context, the safeguarding of digital content on local computers but also in larger networks or on (cloud) servers is addressed. The risk of unauthorised access to such “*Cyber Assets”* must be minimised.

i. What are “Cyber Assets”?

Digital assets or "*Cyber Assets*" are all assets on which the functionality of the systems of the POWERLINES Group depend (e.g. networks, servers, databases, web platforms or in this context also devices). Depending on the company concerned, different assets may be of significance as “*Cyber Assets”*.

ii. How are “Cyber Assets” protected?

Once the relevant *Cyber Assets* have been identified, the corresponding risks (e.g. cyber attacks, encryption of servers and messages, etc.) and vulnerabilities (e.g. in a simulated cyber attack) must be determined. In a further step, these risks must be minimised or weak points improved (management of access to certain data carriers, systematic deletion of data, etc.).

In this context, POWERLINES disposes of internal **IT user guidelines,** which, in addition to the handling of hardware, also concern basic rules for the proper operation of the network infrastructure. This includes, for example, the assignment of a personal identifier to each employee, mandatory password protection of workstations (with corresponding password guidelines for secure passwords) and the prohibition of private shared use of company PCs. The use of cloud storage not provided by POWERLINES is prohibited, as is the use of special/project software that has not been approved by the IT management. Employees must familiarise themselves with the IT user guidelines in the respective valid version.

5.4 RESPONSIBLE SOURCING

POWERLINES endeavours and professes to procuring all its raw materials from responsible sources whenever possible, taking into account social and environmental considerations. Suppliers who value and follow sustainable principles in their business activities should be prioritised for cooperation. A detailed and careful selection of suppliers ensures continuity and long-term efficiency throughout POWERLINE`s supply chain

Supplier selection is not only based on quality, safety and cost, but also on anti-corruption practices, responsible sourcing, human rights due diligence, which includes labour conditions and respect for human rights, conflict-affected and high-risk areas, environmental practices, safety standards and the protection of intellectual property. POWERLINES should only enter into business relationships with suppliers who are committed to respecting and complying with human rights.

Details can be found in the Guidelines on Conduct with business partners.

5.5 UNFAIR COMPETITION AND ANTITRUST REGULATIONS

Antitrust regulations aim at preserving fair competition. POWERLINES' commitment to business integrity also applies in the battle for market share. We do not enter into any prohibited arrangements, and we comply with the applicable rules of fair competition and antitrust regulations.

Violations of antitrust provisions are sanctioned severely in all jurisdictions; already the mere suspicion of a violation may have significantly negative consequences for POWERLINES' reputation. Therefore, POWERLINES is dedicated to implement a zero tolerance approach and will apply sanctions (including disciplinary actions, termination of contracts and damages, as further defined in section 0) against any staff member or business partner, who violates antitrust regulations.

Competition law prohibits the deception of market participants through aggressive, misleading, or other unfair business practices, including but not limited to the promotion of goods and services. The sale of goods and services must not be carried out in a manner that is likely to deceive market participants.

Antitrust law expressly prohibits agreements (cartels) that aim to prevent, restrict, or distort competition or that have such an effect. Antitrust law comprises three core elements, namely:

- Prohibition of anti-competitive agreements, which includes cartels (horizontal) as well as vertical agreements such as price-fixing (e.g., between companies at different levels of the production chain – such as manufacturers and)
- Market abuse (unfair market dominance, resale price maintenance, tie-ins, refusals to deal, abuse of IP rights, sham litigation against competitors with anticompetitive intent, exclusionary practices, creation of artificial barriers to competitors and market entry) resale price maintenance, tie-ins, refusals to deal, abuse of IP rights, sham litigation against competitors with anticompetitive intent, exclusionary practices, creation of artificial barriers to competitors and market entry

- merger control (regulatory approval requirements for mergers, acquisitions, and joint venture transactions)

A more detailed explanation of this issue is included in the relevant Guidelines on the prevention of antitrust violations, which form an integral part of this Directive.

5.6 ADDITIONAL COMPLIANCE TOPICS OF PARTICULAR CONCERN

5.6.1 CONFIDENTIALITY AND DATA PROTECTION

i. General

POWERLINES acts with care and diligence when receiving, processing and storing information (e.g. financial data, technical data, operational data, customer information, file notes, etc.). In this respect, we adhere to data security standards and procedures as customary in the market to prevent the unauthorized access, amendment or destruction of such information. Any applicable data protection laws need to be complied with.

In addition to the applicable laws, POWERLINES possesses a comprehensive internal data protection management system, which is documented accordingly.

The commercial and technical know-how of POWERLINES is crucial for the long term success of POWERLINES. Therefore, all staff members have to ensure that any of POWERLINES' know-how that is not publicly available must be kept strictly confidential and protected against access from unauthorized third parties. In the event the disclosure of certain confidential know-how becomes necessary in the course of a business relationship, staff members need to ensure that the third party has been bound by a standard confidentiality agreement before any confidential information is disclosed. In the event POWERLINES receives confidential information from its customers or business partners, employees have to apply the same standard of care as for POWERLINES' own know-how.

ii. General Data Protection Regulation (GDPR)

The European General Data Protection Regulation (GDPR) has been in force since 25.05.2018. It regulates the processing of personal data relating to natural persons.

„**Personal data**" refers to all information that identify or may identify a natural person ("data subject"; e.g. name, address but also physical, genetic, economic or social characteristics). „**Processing**" means almost any operation carried out with or without the aid of automated procedures, such as collection, organisation, storage, alteration, use or communication of data.

The GDPR establishes as a basic rule the **prohibition of any processing** of personal data. It is only permissible if certain conditions are met. These are:

- The existence of one of the **justifications** expressly mentioned in the Regulation. In particular, the following reasons may be serve as justifications:
    - **Fulfilment of a contract** or other legal obligations**;**
    - **Legitimate interest** of the person responsible which outweighs the data subject's" interest in maintaining confidentiality;
    - **Consent** of the data subject to specific processing.

- **Lawfulness** of processing: personal data must be processed lawfully, fairly and in a way which is comprehensible to the data subject, i.e. transparent.
- Legitimate **purpose** of processing: all processing must have a specific, clear and legitimate purpose. If the purpose ceases to exist, the data concerned must be deleted or anonymised immediately
- Data processing may only be carried out if and to the extent that it is **strictly necessary**. The scope of authorised data processing is therefore also determined by the data that is to be processed to achieve the (legitimate) purpose. Any processing of data beyond this is not permitted. The principle of data minimisation applies.

The **security** of data processed in such a permissible manner must be ensured (e.g. no access by unauthorised third parties; protection against loss/damage).

The data subject is entitled to demand the following in particular from the data controller:

- Information on what data are processed
- Information on the data processed
- Correction of the processed data
- Deletion of processed data
- Opposition to the processing of own data

Failure to comply with the GDPR will be severely sanctioned (**fines** of up to € 20 million or up to 4% of worldwide annual turnover, whichever is higher). Those affected are also entitled to claim **damages**.

5.6.2 INSIDER TRADING

Insider dealings are prohibited by law (e.g. Regulation (EU) No 596/2014) and have direct consequences under criminal law as well as disciplinary consequences. Insider dealings involve the improper use of non-published price-relevant information for personal benefit or the benefit of third parties, when dealing in securities.

POWERLINES' management and staff members may have access to insider information, especially in relation to customers or business partners (e.g. on an upcoming merger or acquisition, on unexpected financial results, important new customers, new technological developments, upcoming material litigation etc.). POWERLINES' management and staff members will not involve in any kind of insider dealings. In particular, POWERLINES' management and staff members who have knowledge of insider information must not

- disclose such information to third parties;
- deal with securities or connected financial derivatives of the companies concerned;
- advise third parties to deal with securities or connected financial derivatives of the companies concerned.

It is prohibited to trade or attempt to trade in securities of related companies such as Bouygues or any other company concerned by the "inside information", whether for oneself or for another person. Insiders are strictly prohibited from trading in securities of affiliated companies such as Bouygues (shares or securities giving access to share capital, etc.) and in particular:

- to buy such securities;
- sell such securities;
- to liquidate, in whole or in part, balances invested in such shares under the Group's Employee Savings Plan;
- offer shares in an affiliated company to a company;

5.6.3 ANTI-FRAUD MEASURES

The number of fraudulent actions, especially internet based fraud, is increasing worldwide. Apart from simple forms of fraud committed by individuals, even more complex fraudulent schemes operated by organized groups of criminals can be observed. To avoid all forms of fraud and protect POWERLINES efficiently a dual control principle shall apply.

- Dual control means that the actions and situations described hereinafter require the consent of or review by two authorized staff members:
  - Any contract, agreement, statement or other declaration under which obligations of a POWERLINES Company may arise or by which a POWERLINES Company waives any existing rights;
  - Any acts of representing a POWERLINES Company vis-à-vis third parties.
  - Payments of all kinds; such are created by one employee and executed by another employee. This particularly applies to larger payments and those made after the recipient's payment details have been changed.
- The Group Management Board may define exceptions to this dual control principle for specific (routine) situations, whereas any such exceptions need to be documented in a Group Management Board resolution.
- In each case, the consent of and/or review by two authorized staff members needs to be documented properly (ideally, on the relevant document itself).

In addition to the above-mentioned cases, the internal **guideline for finance employees** contains detailed guidelines for handling payments to suppliers. Within this framework, various possible scenarios are covered and corresponding instructions for action are given, e.g:

- Known supplier with known bank details sends new bank details by e-mail or letter
  - ⇨ Telephone enquiry at the supplier's premises; bank details will only be changed if confirmed
- Known supplier with known bank details asks by telephone for transfer to a new account
  - ⇨ Ask supplier to confirm this request in writing and contact the supplier by telephone to check that the new data is correct; only if confirmed will the bank details be changed
- New suppliers
  - ⇨ Bank data is checked before being fed into the system (e.g. via the supplier's homepage, the order confirmation or the supplier's general terms and conditions)

5.6.4 PAYMENTS, ACCOUNTING AND FINANCE

Employees who work in finance enter into direct contact with significant compliance risks due to their position. It is therefore particularly important that employees working in this area are

always informed about the legal obligations that apply to POWERLINES in this regard in order to avoid violations, fines, etc.

Any payments by POWERLINES shall be made transparently, by way of wire transfer or check. Cash payments shall not be made; in exceptional cases where cash payment cannot be avoided such payment may be made with the approval of the Local Managing Directors. Any **cash payment** needs to be documented properly (by indicating the name of the payer, the person who approved such payment, the recipient, the amount paid, the date of payment, the invoice and the purpose of such payment) and immediately reported to the finance department. Any payments must be made to the respective business partner only as indicated on the underlying invoice (**no payments to third parties**).

Due to the frequent application of the dual control principle, financial officers must be especially sensitive to potential conflicts of interest and must always know who is the superior who might be responsible for such a conflict (see section 5.2 and the related Guidelines on the Prevention of Corruption and Conflicts of Interest).

In its decision-making processes POWERLINES relies on the accuracy and correctness of its accounting records. In this context, it is of particular importance that any accounting and financial data as well as personnel data must be treated as confidential. All business transactions must be recorded in our books completely, accurately and promptly, in accordance with specified procedures, verification principles and generally accepted principles of accounting. These records shall contain any necessary information on all of the company's respective transactions and shall be retained in accordance with applicable laws. No staff member may create any assets or funds which are not reflected in the books.

A detailed description of the basic accounting principles is contained in an **internal guideline** for financial staff. It is continuously updated and optimised in consultation with the CFO of the POWERLINES Group and the head of the Accounting & Finance department as well as the head of the Controlling & Reporting department.

5.6.5 EXPORT CONTROL

i. General

Many jurisdictions in which POWERLINES does business have passed export control laws which govern the cross border transfer of goods, services, technology and / or payments. Such laws may include black lists forbidding the export (incl. re-export) of certain goods, services, technology or payments to certain countries or persons and / or the import from such blacklisted countries or persons.

Violations of export control provisions may trigger severe sanctions (incl. fines, imprisonment and the blacklisting of the company itself). Therefore, any staff members who deal with the cross border export or import of goods, services, technologies and cross border payments have to be familiar with and strictly comply with the applicable export control provisions. In cases of doubt staff members shall contact the responsible Local Managing Directors responsible for the envisaged transaction without undue delay.

ii. Review Process

In addition to the above-mentioned regulations, which must be observed in any case, POWERLINES has a system for detecting and correctly handling problematic transactions. This process takes place in close coordination and cooperation with the POWERLINES parent company and the *Ethics, Compliance and Privacy Department (ECPD - or the respective office responsible for ethics, compliance and data protection)* set up there.

In a first step, the planned cross-border transaction must be **classified** and assigned to one of the following lists:

- Black List: prohibited transaction
- Red List: Review to be conducted
- Green List: permitted transaction

This initial assessment is carried out by a responsible employee who is authorised to do so. This employee must subsequently prepare a detailed **report** in a timely manner, which, in addition to **(i)** categorising the transaction, includes a description of the parties involved and their origin (citizenship and residence of natural persons, place of incorporation and domicile of companies and their control structure) and **(ii)** a description of the planned transaction steps.

This report will be completed and amended in consultation with the POWERLINES Group Legal Department and legal advisors. In addition to the above-mentioned information, the final report must contain **(iii)** a verification of the other party/parties together with any shareholding structures, **(iv)** a verification of the currency in which the transaction is conducted, and **(v)** an assessment of the (in)admissibility of the transaction alongside recommendations for action, which take into account both legally binding requirements and compliance requirements.

The final report must be submitted to the **Group management board**, which may comment on it and request further adjustments before the report is forwarded to the **ECPD** (*or the respective office responsible for ethics, compliance and data protection)* for final decision.

Details can be found in Attachment 5 of this guideline.

5.6.6 HUMAN RESOURCES

When hiring new employees and managing existing employees, it is important to observe the applicable laws, but in particular the rules of fairness, respect and equal treatment that apply to interpersonal relationships.

POWERLINES has appropriate **internal guidelines** for dealing with specific issues relating to human resources management to ensure consistency and straightforwardness in this respect. Salary measures and other measures of importance are linked to internal approval processes.

A proper procedure must be followed when **hiring new employees**. The applicant's qualifications must, without exception, be documented. This information may not be omitted for any reason. In the interest of POWERLINES, the hiring criterion is always the **qualification** of an applicant, never a close relationship to specific persons. Any applications among family and friends have to be made transparent. For this reason, applicants are encouraged to disclose any family or personal relationships that could give the impression that POWERLINES is not awarding a position on the basis of qualifications but on the basis of other, unfair

characteristics. Such attempts by applicants to obtain employment by fraud without the necessary qualifications must be reported by the relevant persons to the local management.

5.6.7 EMPLOYMENT AND REMUNERATION

POWERLINES attaches great importance to training and knowledge transfer. The focus is on creating an environment that offers employees personal and professional prospects and in which exceptional performance as well as exceptional results can be achieved and rewarded. Discrimination in salary, promotion, training, advancement opportunities or termination of an employee based on gender, race, national or social origin, caste, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or other conditions is prohibited. Investment in the skills and competences of employees is to be encouraged. The aim is to promote the economic well-being of the company as well as long-term employment and personal development of all employees through training and other development measures.

The right to freedom of association and collective bargaining should be respected and a long-term, constructive dialogue with employee representatives should be sought. POWERLINES undertakes to respect the freedom of association and the right to collective bargaining of its employees and not to discriminate against trade unions or unionised employees.

POWERLINES complies with applicable national laws regarding working hours and supports its employees in achieving a healthy work-life balance. Wages, salaries, benefits and overtime pay are in accordance with applicable national laws and the relevant collective labour agreements. The remuneration system reflects legal requirements, prevailing industry standards and local conditions and provides for awards and bonuses for individuals or groups as a reward for particularly honourable performance.

5.6.8 HEALTH AND SAFETY

POWERLINES recognises its responsibility for the safety and health of its employees. POWERLINES ensures a healthy and safe working environment and has appropriate measures in place to continuously assess and reduce risks and prevent accidents. POWERLINES provides regular training to increase the safety awareness of its employees and to provide them with practical skills in dealing with sources of danger. The planned continuous evaluations and training courses enable POWERLINES to optimise safety in the workplace on an ongoing basis.

5.6.9 BUSINESS TRAVEL

In the context of business and study trips, the appropriateness of the selected accommodation, training locations, travel class, etc. must always be considered. Expenses of any kind must be in line with local standards and must be covered by receipts in order to be reimbursed. Extravagant stays at the expense of POWERLINES that are not compatible with a professional appearance or are not moderate will not be financed.

This also applies to leisure activities used in the course of a business trip, provided they are carried out at POWERLINES' expense (e.g. dinners, visits to the cinema, use of paid leisure

activities such as fitness centres). Such activities must always be within a reasonable financial framework.

POWERLINES finances business trips of its employees and managers, but not of their friends or relatives.

5.6.10 SOCIAL NETWORKS

Respectful interaction is also a priority within social networks, which is why condescending and insulting comments should never be made. In addition, behaviour within social networks must never lead to damage to POWERLINES' reputation. When posting images, audio and/or video recordings, it is important to ensure that you have the necessary rights to these mediums. The rights of third parties must not be infringed. In case of doubt, please refrain from uploading a contribution.

These rules apply in particular within the scope of the employment relationship only to those social media platforms in which a connection with POWERLINES is recognizable or where POWERLINES has been identified as the employer. If no connection to POWERLINES is recognizable, everyone is unrestricted in their postings, whereby POWERLINES assumes that employees will in any case treat social networks with respect and comply with the legal provisions and ethical values.

5.6.11 RESPECTFUL INTERACTION WITHIN THE WORKPLACE (NON-DISCRIMINATION)

POWERLINES does not tolerate any discriminatory behaviour or unequal treatment, be it on the grounds of ethnicity, religion, ideology, disability, age, sexual orientation, gender or other characteristics. In particular, all forms of sexist behaviour, sexual harassment, racism, bullying and other similar behaviour are strictly rejected. All managers who become aware of discriminatory behaviour or unequal treatment on the aforementioned grounds must inform the HR department immediately and take appropriate remedial action in consultation with them. This may also include dismissal from the employment relationship without notice. POWERLINES attaches great importance to fair and respectful interaction and has a zero-tolerance policy towards improper behaviour and sexual harassment.

The POWERLINES Group practises a friendly and objective approach between management, employees and third parties.

Sexual harassment, discrimination, bullying, abuse of power, intimidation or threats and other forms of harassment are not tolerated.

Sexual harassment is any behaviour that belongs to the sexual sphere, impairs the dignity of a person or is intended to do so, is undesirable, inappropriate or offensive to the person concerned. POWERLINES does not tolerate sexual harassment in any way, whether through

physical or other verbal behaviour (innuendos, suggestive comments, jokes, gestures, looks, obscene images, etc.) within the POWERLINES Group or by third parties.

5.6.12 BEHAVIOUR IN THE BUSINESS WORLD

POWERLINES attaches great importance to the integrity of its business partners and therefore enters into contractual relationships with customers and suppliers who represent values similar to those of POWERLINES and also live by them. Strategic business partners are evaluated before entering into a contractual relationship. Cooperation is only commenced if this evaluation process has turned out in favour of the strategic business partner. Great importance is attached to respectful and professional dealings with (potential) business partners. Therefore, POWERLINES also endeavours to comply with agreements made as far as possible and stands for handshake quality. The confidentiality of the exchanged information is a matter of course and internal information will not be passed on by POWERLINES as well as by the contractual partner to persons outside the company. Therefore, sufficient attention must be paid to the integrity of third parties with whom business relationships are entered into or contemplated, otherwise POWERLINES could become more or less directly involved in actions that violate laws (competition law, human rights, etc.), which could damage reputation, have a lasting impact on business activities and result in a liability for the company.

Details can be found in the Guidelines on Conduct with business partners.

5.6.13 COMMITMENT TO HUMAN RIGHTS, FAIR WORKING CONDITIONS AND ENVIRONMENTAL PROTECTION

In addition to minimizing the specific compliance risks addressed in this guideline and its annexes, POWERLINES generally values adherence to the rules of respectful cooperation. **Honesty, integrity, respect and loyalty** should characterize interactions both within the company and between POWERLINES companies, as well as with customers, suppliers and business partners. This includes the responsible use of resources and the environment, as well as always showing the necessary respect when dealing with competitors, in addition to observing the rules of competition and antitrust law. Defamation of competing companies is unacceptable and will not be tolerated by POWERLINES.

POWERLINES is committed to human rights, fair labour conditions and environmental protection and will neither directly nor indirectly get involved in any business transactions, or projects involving, or involved with

- the use of forced labour, including child labour or violations of any other applicable regulations of the International Labour Organisation (ILO);
- violations of the European Convention on Human Rights;
- political unrest or other violations of human rights;
- violations of applicable environmental protection laws or international conventions thereon;
- violations of fair working conditions as applicable in the respective country; or
- violations of the applicable regulations issued by international organizations including without limitation the corresponding UN Conventions.

Details are set out in the POWERLINES fundamental ethical principles in Attachment 4.

6. WARNING SIGNS

In the various areas described in this guideline, it is important to pay attention at an early stage to the presence of warning signs indicating a compliance violation. Depending on the specific area, these warning signals may appear differently. It is therefore important to deal with them preventatively in order to classify them correctly in case of application.

Particular caution is required in areas in which contact is established with other persons (e.g. suppliers, external consultants, business partners, competitors).

Examples of warning signs in the appearance or behaviour of others are:

- Surprising or sudden, inexplicable improvement in the financial situation of the other party, possibly in a generally deteriorating economic climate;
- Surprising or sudden, inexplicable deterioration in the financial situation of the other party;
- The actual performance or the value of the stipulated performance cannot be inferred from a contract or it does not appear appropriate for the remuneration;
- A competing company proposes to take illegitimate steps in the course of a bidding procedure;
- The other party obviously refuses to undergo any kind of examination or similar (cf. selection process for suppliers, questionnaire for external consultants);
- A supplier offers at unusually high prices;
- Sudden, unjustified, substantial price increases by a supplier;
- The supplier has no other customers.

7. RESPONSIBILITY

The CEO of the Group Management Board (hereinafter referred to as "**Group CEO**") shall have ultimate responsibility for the implementation, reviewing and improving of this Policy.

The responsibility for compliance in each POWERLINES company rests with the local managers, who may implement additional processes as necessary to ensure that this policy is fully implemented and that all suspected violations of this policy are reported and investigated in accordance with the requirements described in more detail below (section 10). If a breach of this Policy is identified by a local manager, the Group CEO shall be notified in accordance with section 10. This step is to be taken, however, only after the analysis and investigation in accordance with section 10 (2) (a) to (g) below.

At each POWERLINES Company the compliance responsibility shall rest with the Local Managing Directors who may implement further procedures within their operations as required for ensuring that this Policy is fully implemented and that any suspected violations of this Policy will be reported and examined in accordance with the requirements detailed below (section 10). Should any violation of this Policy be identified by the Local Managing Director, the Group CEO has to be informed in accordance with section 10 below, however only after analysis and investigation in accordance with section 10.1 para a) to d).

Notwithstanding the above POWERLINES sees compliance as a responsibility of the entire organization. Therefore, any superiors have to function as role models and have to ensure that all staff members under their responsibility are familiar with this Policy and apply its rules in everyday business.

The Local Managing Directors of each POWERLINES Company will be asked to provide a compliance report covering all of the areas mentioned in this Policy as well as to confirm compliance with this Policy annually and whenever deemed necessary to provide ad hoc compliance reports to the Group CEO (see template report 1 in Attachment 2 hereto).

8. TRAINING

Training will be provided on this Policy and its implementation and will be tailored to the risks identified within the POWERLINES Company concerned. Trainings will be held to ensure proper understanding of the contents, application, reporting mechanisms and consequences of this Policy, as soon as practicable following the implementation of this Policy and thereafter at regular intervals, however at least on a yearly basis. The group of Relevant Staff who will be obliged to participate in such formal training sessions will be selected by the Group Management Board based on a proposal issued by the Local Managing Directors of the respective POWERLINES Company and informed in due time before the respective training dates. In addition, identified risks and threats are regularly discussed at management meetings with the managing directors of the POWERLINES Group, the managing directors of the subsidiaries and the divisional managers of the POWERLINES Group and, if necessary, additional training is provided.

9. SANCTIONS AND CONSEQUENCES

Under the applicable laws and regulations, violations of most of the principles set forth in this Policy may lead to severe fines or even imprisonment as well as claims for damages. Please note that both the individual staff member as well as the respective POWERLINES Company may face sanctions. Therefore, violations of this Policy may not be tolerated!

Possible consequences may include a review and termination of the business relationship with the third party concerned, initiating legal claims or disciplinary action in accordance with POWERLINES' disciplinary procedures. Such disciplinary action may also lead to the termination of the employment contract with immediate effect.

Disciplinary action and other consequences may also be applied for instances of failure to report known violations of this Policy or intentionally providing false information in reports or confirmation letters.

10. REPORTING VIOLATIONS

10.1 INTERNAL PROCEDURE

All staff members and business partners are encouraged to raise any genuine concern about suspected violations of this Policy or any other misconduct or malpractice. Known breaches of this Policy must be reported by staff members to their respective **superior**.

Each superior shall follow the reporting guidelines set forth below:

1) Report the matter directly to the Local Managing Directors of the POWERLINES Company where the suspected misconduct has occurred.
2) The Local Managing Directors shall report the matter to the Group CEO, however only after analysis and investigation in accordance with subparagraphs a) to g) below (please use report template 1 as enclosed in Attachment 2 hereto). It will be the responsibility of the Group CEO to communicate such instances further.
3) The local managing directors will inform and involve any competent works council body that may have been established accordingly, if the review of the allegations should reveal reasonable suspicion, and will also give the accused the opportunity to justify themselves, provided that this does not jeopardise the investigation.

POWERLINES will not tolerate any form of retaliation or career disadvantages against staff members raising concerns in good faith. If you report your concerns and seek advice in good faith, you will always be supported by POWERLINES to the extent reasonably possible.

On receipt of information on a possible violation of this Policy, the Local Managing Directors of the POWERLINES Company in question are responsible for directing the following actions:

a) **Verification** of the accuracy of allegations and compliance with country-specific legal requirements for investigative measures
- Ideally, the research process should be carried out in consultation with legal advisors and an informed representative of the Owner´s Group;
- In the course of the investigation process, the persons concerned should be heard as far as possible if this would not hinder the investigation;
- Taking of appropriate **disciplinary measures** and maintaining a zero tolerance policy towards infringements;
- Ensuring **confidentiality** to ensure an efficient investigation and protect the reputation of POWERLINES;
- **Reporting** the breach to the Group CEO as outlined above (submission of the ad hoc report in Attachment 2);
- The management of the POWERLINES Group decides whether the whistleblower is informed about the result of an investigation and/or the consequences drawn from it.

b) Safe **storage** of evidence and data to enable POWERLINES to take legal action, if so decided by the management.

c) Identification and elimination of weaknesses in procedures and processes to **prevent further incidents**.

d) Taking all appropriate measures to compensate for damage to company assets and securing evidence for possible criminal prosecution.

It is the responsibility of the Local Managing Directors to direct such cases in a way that might achieve the recovery of lost assets.

Alternatively, it is also possible to report **anonymously** to our whistleblowing platform which can be found here: https://app.whistle-report.com/report/fead1ffc-f615-49cb-8f7a-612b53198936. In order to ensure the greatest possible independence and objectivity for the whistleblowing platform, we have appointed an external law firm in accordance with §13 Abs 4 HSchG ("Whistleblowerprotectionact") to receive and objectively evaluate all reports. Subsequently, the procedure will be carried out in coordination with the respective POWERLINES company.

10.2 REPORTING TO THE OWNER´S COMPLIANCE

Every incident must be reported to the Owner´s Compliance immediately after its occurrence. This report must be made regardless of whether the incident has already been investigated, clarified and/or processed/closed in a documented form. The local managers of the POWERLINES companies are therefore requested to submit any reports using report template 1: "AD HOC" Compliance Report (Attachment 2) to POWERLINES Group Team Assistance and POWERLINES Group Head of Legal Services, who will forward the incident to the Owner´s Compliance. The further progress or completion of any investigation of an incident must be reported continuously by the local managers, also in a documented form.

11. MONITORING, REVIEW AND IMPROVEMENT

This Policy will be kept up-to-date through regular monitoring and review. Based on the results of such monitoring or review this Policy may be subject to amendments, as required from time to time.

12. QUERIES

Should you have any questions regarding this Policy or the supporting principles please contact your superior.

Attachment 1
CONFIRMATION LETTER (→ FOR RELEVANT POWERLINES STAFF)

Confirmation Letter
POWERLINES Ethics & Compliance Policy

IMPORTANT: Do not sign this letter unless you have read and fully understood the POWERLINES Ethics & Compliance Policy, including its annexes (hereinafter referred to as the "**Policy**") as enclosed to this Letter (enclosure 1).

NAME:

COMPANY NAME:

JOB POSITION:

SUPERIOR:

LOCAL MANAGING DIRECTORS WITH COMPLIANCE RESPONSIBILITY:

1) By signing this letter I herewith confirm that
   - I have received, read and fully understood the Policy (enclosure 1), which is effective as of 24/06/2025 and shall apply, as amended from time to time, to any incidents occurring on or after 24/06/2025;
   - I will strictly comply with the Policy, make the required reports and obtain the required approval(s) as set out therein without undue delay;
   - I have a duty to report any known non-compliance with the Policy to my superior (as indicated above);
   - If I hold a position as a superior, I have the duty to report any known noncompliance with the Policy to the Local Managing Directors (as indicated above);
   - Upon prior notification I will participate in any obligatory compliance training(s) held in my company from time to time;
   - I acknowledge that the Policy (enclosure 1) may be amended from time to time by POWERLINES Group in any possible way to ensure compliance within POWERLINES and the efficiency of the Policy. I will comply with the amended Policy as soon as such amendment has been brought to my attention.

2) I understand that I must immediately refer any questions of doubt concerning compliance to my superior (as indicated above) for guidance.

3) I understand that if I should fail in my duty to comply with the Policy, then:

   - breach of these rules could lead to significant damages and fines to POWERLINES as well as criminal charges and potentially charges against POWERLINES, its managing directors and/or myself;
   - any agreement or arrangement which infringes the rules foreseen in the Policy may be unenforceable;
   - staff members who violate the Policy may be dismissed for gross misconduct

4) In case I have a managerial function as a superior, I furthermore confirm that:
   - I will provide all of my designated staff members with the Policy and will take all appropriate measures that they comply with its rules.
   - I will ensure that all of my designated staff members will participate in any obligatory compliance training(s).

.....	.....
Place, Date	Signature

Attachment 2
REPORT TEMPLATE 1: „AD HOC“ COMPLIANCE REPORT

Please note that

- known breaches of the POWERLINES Ethics & Compliance Policy, including its annexes (the “**Policy**”) must be reported,
- there is no need to have concerns if you are acting in good faith: POWERLINES will not tolerate any form of retaliation or career disadvantages against staff members acting in good faith to the extent reasonably possible.

Please indicate the information foreseen in the below form

- as comprehensibly and completely as possible,
- and make sure that you are acting in good faith and to the best of your knowledge:

Reporting Party:	[*please indicate your full name and function]*
Company:	[*please indicate the company concerned by this report*]
Date:	
Subject:	[*please indicate the subject matter of this report by indicating the relevant key word, e.g. conflict of interest*]
For the attention of:	[*please indicate the recipient of this report, e.g. Local Managing Director*]
Full Report:	[*please describe the incident which is subject to this report in more detail and make sure to include the following elements:* • *What is the incident about (e.g. facilitation payment)?* • *Why do you believe that a violation of our Ethics & Compliance Policies might have occurred?* • *When did the incident occur? (please include relevant dates)* • *Who are the persons involved? (please include their full names and functions)* • *Please provide any evidence and/or data available to you* • *If applicable, please indicate any measures taken as a consequence of such incident.*

…… ……

Place, Date Signature

Attachment 2
REPORT TEMPLATE 2: ANNUAL COMPLIANCE REPORT

Please note that this annual report pursuant to section 10 of the POWERLINES Ethics & Compliance Policy (including its annexes, hereinafter together referred to as the "**Policy**") is an essential part of POWERLINES' compliance efforts. Based on the results of these reports, we are in a position to critically review and assess the effectiveness of our compliance processes; hence, these reports are also crucial for identifying required adjustments and improvements to ensure the long-term success of POWERLINES..

We kindly ask you to take your time to carefully fill out this report and provide the information foreseen below as comprehensibly and completely as possible:

Reporting Party:	[*please indicate full name and function]*
Company:	[*please indicate the company concerned by this report*]
Date:	
For the attention of:	[*please indicate the recipient of this report, i.e. Group CEO*]
Training	[*Please describe whether all of the designated Relevant Staff have participated in the mandatory compliance training(s). If not, please indicate the name and function of staff members who have not participated in training measures.*]

By signing this annual report, I confirm that the above information is true and correct and that:

- I have received, read and fully understood the Policy (Version 06/2025);
- I have strictly complied with the guidelines of the Policy, reported all incidents and obtained any required approval(s) without undue delay;
- I have demonstrably provided my Relevant Staff with the Policy and I have implemented all appropriate measures that they comply with them.
- I have received from all of my Relevant Staff a signed confirmation letter by which they confirm the receipt of and the compliance with the Policy.
- I confirm that except from incidents already reported via the respective "AD HOC" Compliance Reports, if any, no other incidents related to the Policy occurred over the year.

…… ……

Place, Date Signature

Attachment 3
OBLIGATORY COMPLIANCE CLAUSES

[*Clauses that must be included in agreements with relevant business partners, unless the management of the Powerlines Group decides otherwise*]

Version 1:

1.1 *Powerlines is committed to conducting business honestly, fairly and transparently and thus complies with all applicable laws and principles of business ethics. Powerlines also expects such compliance from [Third Party], particularly with regard to the essential ethical principles of Powerlines (available at www.powerlines-group.com > Company > Ethics).*

1.2 *[Third Party] shall ensure that in connection with the performance of the Agreement all regulations of the International Labour Organisation (ILO) regarding the rights of workers and their working environment (minimum standards such as compliance with human rights, prohibition of child labor and forced labor, appropriate remuneration etc) are adhered to. [Third Party] shall ensure that these obligations are binding upon its suppliers.*

1.3 *[Third Party] confirms that there are no intermediaries who gain a personal advantage and/or personal pecuniary benefit etc in connection with the conclusion of the Agreement with Powerlines. [Third Party] shall avoid any situations that suggest conflict of interest towards Powerlines and further commits to refrain from any actions which could cause any harm to Powerlines, in particular any actions which could cause harm to its reputation.*

1.4 *[Third Party] warrants to comply with all applicable legislation. Powerlines does not accept any corruption and bribery. In particular, [Third Party] must not demand, offer, or grant any undue advantages or other benefits.*

1.5 *The violation of the provisions of this [Article 1] shall constitute a material breach of contract which entitles Powerlines to terminate the contract with immediate effect. In such case [Third Party] will lose its entitlement to the agreed remuneration unless services have been rendered/deliveries have been made which can be used by Powerlines. This is without prejudice to Powerlines' right to claim damages. [Third Party] shall be liable towards Powerlines for any disadvantages and shall bear all additional costs which may incur in connection with such termination due to such default of [Third Party].*

Version 2:

1. *[Third Party] represents and warrants that it is and shall remain during the term of this agreement in compliance with all applicable laws, regulations and international conventions, including but not limited to all anti-bribery and competition laws. Furthermore, [Third Party] acknowledges having read and understood the POWERLINES Group Ethics & Compliance Policy [● LINK]. The provisions of this Policy also set forth POWERLINES' expectations towards all of its business partners.*

Therefore, POWERLINES expects [Third Party] to comply with the principles of this Policy or with the equivalent principles of [Third Party's] own ethics & compliance policy. In connection with any aspects of this agreement or any other transaction involving POWERLINES, [Third Party] has not and will not, directly or indirectly, in connection with the performance of services under this agreement or otherwise on behalf of POWERLINES, engage in prohibited conduct. Prohibited conduct includes to promise, offer or grant to a person any undue advantage or to request or accept any undue benefit or advantage to improperly influence actions and any other conduct which could cause harm to POWERLINES' reputation.

2. *POWERLINES may terminate this agreement immediately upon written notice in the event [Third Party] has failed to meet its obligation in [section 1], whereupon POWERLINES shall have no further obligation or liability under this agreement. If POWERLINES reasonably believes that the event given rise to such a termination also constitutes a violation of the UK Bribery Act and/or the U.S. Foreign Corrupt Practices Act or any other applicable Anti-Bribery Laws, any claims for payment by [Third Party] with regard to this agreement shall be automatically terminated. [Third Party] shall indemnify and hold harmless POWERLINES against any and all claims, losses, costs or damages arising from or related to termination, or a determination to withhold payments under this section.*

Additional clauses on other compliance risks, if applicable:

1. *Beyond the above-mentioned obligations regarding compliance, POWERLINES is committed to comprehensive environmental protection in its activities. Therefore, the Parties undertake to give priority to sustainable working methods, materials and methods over those that are harmful to the environment in the execution of this contract.*

2. *[Third Party] confirms and guarantees compliance with all laws, regulations and other requirements regarding embargoes, import and export restrictions and customs clearance of imported and exported goods.*

Attachment 4
FUNDAMENTAL ETHICAL PRINCIPLES OF POWERLINES

1. COMPLIANCE WITH LAWS AND INTERNAL REGULATIONS

POWERLINES and its employees are committed to comprehensive compliance. This means the consistent adherence to all relevant external regulations (e.g. laws and decrees), but also the strict observance of internal guidelines and fundamental ethical principles.

Particular attention is paid to the prevention of corruption, fraud, conflicts of interest and the integrity of competition.

2. HONESTY, INTEGRITY AND RESPECT

POWERLINES attaches great importance to honest, fair and respectful conduct. This applies both within the company and in dealings with customers and business partners. The integrity of the company has the highest priority and is ensured by conscientious adherence to the present principles. Tolerance, respect and equal treatment are lived every day at POWERLINES.

A corresponding standard is also applied to the integrity of business partners. In POWERLINES' view, a commitment to good ethical and legal conduct is indispensable in order to be considered a contractual partner.

3. LOYALTY

The quality of a relationship, whether internal or external to the company with customers and business partners, depends to a large extent on the loyalty the parties offer each other. This applies in particular to the fulfilment of obligations, but also to open communication and a healthy basis for discussion.

Long-lasting business relationships and handshake quality are therefore advantages POWERLINES is proud of and whose maintenance is of great importance.

4. CONNECTION TO THE COMMUNITY

POWERLINES operates internationally and attaches great importance to being a true part of the community in the regions where the company is active. Through its activities, POWERLINES supports the development of regional infrastructure and in this course creates an active exchange with the community.

Respect for local authorities and regulations as well as regional customs are preconditions for an efficient togetherness. POWERLINES is interested in the expectations of its customers, local residents, employees and the community and strives to meet these expectations.

5. UNCONDITIONAL COMMITMENT TO HUMAN RIGHTS AND FAIR WORKING CONDITIONS

Respect for human rights must be a matter of course for everyone. POWERLINES clearly and unequivocally opposes any violation of these fundamental social rules.

POWERLINES also demands this commitment as well as compliance with the European Convention on Human Rights, other nationally and internationally applicable regulations on human rights and fair working conditions from all business partners and will not participate in projects that involve a violation of these regulations.

6. ENVIRONMENTAL PROTECTION

The environment as the habitat of humanity concerns everyone and its protection requires collective effort. POWERLINES recognises this responsibility, which exists not only towards the planet, but also towards future generations. POWERLINES' goal is to find, apply and develop sustainable business practices and to encourage business partners and suppliers to make sustainability a priority in order to reduce negative environmental impacts and work towards a cleaner environment.

Attachment 5
LIST OF CRITICAL COUNTRIES IN RELATION TO EXPORT CONTROL

If a transaction involves the following countries, their nationals or companies from these countries (established or resident there or directly/indirectly controlled by nationals of these countries or directly/indirectly controlled by companies established or resident there), the export control rules (see section 5.6.5) must be observed:

- Countries on which the Owner´s-ECPD[1] has issued a report
- Afghanistan
- Egypt
- Bosnia-Herzegovina
- Burundi
- China
- Democratic Republic of the Congo
- Eritrea
- the Falkland Islands
- Guinea
- Guinea-Bissau
- Iraq
- Iran
- Yemen
- Kosovo
- Cuba
- Lebanon
- Liberia
- Libya
- Mali
- Macedonia
- Moldova
- Montenegro
- Myanmar
- North Korea
- Pakistan
- the Palestinian territories
- Russia
- Serbia
- Zimbabwe
- Somalia
- Sudan (North and South)
- Syria
- Tunisia
- Ukraine
- Venezuela
- Belarus
- Central African Republic

[1] Ethics, Compliance and Privacy Department of the Owner´s Compliance (or the respective office responsible for ethics, compliance and data protection) (see also section 5.6.5 of this policy).

Black List

In addition, the following countries/transactions are on the blacklist. A transaction with or concerning citizens of these countries or companies from these countries (established or resident there or directly/indirectly controlled by citizens of these countries or directly/indirectly controlled by companies established or resident there) is absolutely prohibited:

- Transactions on which the Owner´s-ECPD[2] has issued a report
- Iran
- Crimea / the Donets Basin
- North Korea
- Cuba (if the transaction is denominated in US dollars ($))
- Sudan (North and South; provided the transaction is denominated in US dollars ($))

Also: transactions containing a boycott clause

[2] Ethics, Compliance and Privacy Department of the Owner´s Compliance (or the respective office responsible for ethics, compliance and data protection) (see also section 5.6.5 of this policy).