



# Venterra's View: Our Code of Ethics & Conduct

**Date:** November 2024

**Document Ref.:** VG-LEG-COD-001 Version: 3

**Approved by:** The Board of Directors



## A message from our Chief Executive Officer

Venterra's View, our Code of Ethics and Conduct, is more than a set of rules—it's a testament to our shared values and commitment to excellence. It guides our behaviour and directs you to detailed policies and procedures.

Our values are the bedrock of our company culture. Acting responsibly and with integrity is not just expected; it's essential in all our interactions—whether with customers, partners, or colleagues.

This Code sets the standards for how we act on behalf of Venterra, ensuring we all strive for the highest level of professionalism and ethical behaviour. It is crucial that everyone understands and embodies these principles in their daily work.

If you encounter a situation that seems inconsistent with our Code, we urge you to speak up. Your courage in raising concerns is always valued.

Together, let's uphold our Code with pride, as our reputation and success depend on the actions and integrity of each team member every day.

**Ed Daniels**  
Chief Executive Officer, Venterra



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# Who we are and what we value

Venterra is a dedicated offshore wind energy service group. Our companies engineer, build, and support the operations of offshore wind energy developments around the world.

Our vision is to become a global services champion by enabling wind energy to lead in the energy transition over the next decade and beyond. To reach our goal, our local communities, suppliers, and customers must be able to place their trust in us to conduct business with integrity and respect human rights in every place we operate. It's important that each member of our team recognises their responsibility in cultivating this trust and safeguards our reputation by embodying our values every day.

# Our Values

Our values are the backbone of our Code. We expect and encourage you to be:



## Responsible

- We act with integrity and take responsibility.
- We prioritise health and safety and champion sustainable practices.
- We speak up and communicate openly.
- We comply with all applicable laws.



## Collaborative

- We foster teamwork and cooperation and care for our community.
- We embrace diversity and inclusivity and treat people right.



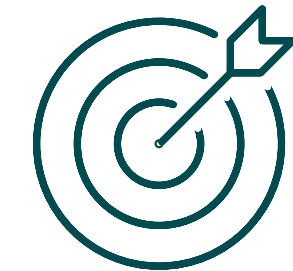
## Innovative

- We embrace creativity and consistently deliver innovative solutions.



## Entrepreneurial

- We are agile and commercially rigorous.
- We have an entrepreneurial spirit and mindset.



## Responsive

- We thrive on collective growth and development.
- We are driven by ambition.



# The purpose of our Code

Our Code is your guide to making ethical decisions and conducting business with integrity. It aligns our values with clear principles, supporting your daily work by:

1. **Clarifying responsibilities**
2. **Signposting relevant policies and procedures**
3. **Directing you to the right people for further support**

We've simplified complex legal requirements into easy-to-understand guidelines, ensuring compliance with all applicable laws. When faced with conflicts between the Code and regulations, we always follow the strictest standard.

Your commitment to our Code is crucial. By upholding its principles, you protect our reputation, financial stability, and operational licenses. Remember, integrity starts with you!

**Our Code empowers you to act responsibly, follow the rules, and make informed, ethical choices every day. Together, we create a positive and trustworthy work environment.**

## Need more information?

Our policies and procedures provide detailed guidance on the various topics presented in our Code.

All our policies and procedures are available via the [Compliance Hub](#).





## Who does our Code apply to?

Everyone who works within the Venterra Group must understand and follow our Code, including the relevant policies and procedures.

Our Code applies to all Venterra Group employees, officers, board directors, and anyone who conducts work on our behalf (including consultants, contractors, secondees, volunteers, sponsors and otherwise). Venterra Group includes Venterra Group Plc and Venterra Limited and its subsidiaries worldwide also referred to as “Venterra”, “we”, “us”, “our”, “ourselves”.

We also extend our commitment to integrity beyond our company and ask that our partners, (including contractors, suppliers, and vendors), adhere to our Partner Code of Conduct or follow similar or higher ethical standards. For certain third parties, we may seek contractual agreements to ensure alignment with applicable laws and our Code’s principles. By working with like-minded partners, we strengthen our responsible business practices and create a positive impact across our entire network.



# Our commitment and shared responsibilities

Our Code guides us to work with integrity. We're all committed to following it every day.

### As a valued member of Venterra, you should:

- Familiarise yourself with the Code and available tools
- Understand policies and procedures relevant to your role
- Complete assigned training on time

### While the Code can't cover every scenario, it provides a solid foundation. When in doubt:

- Use the decision tree for guidance
- Reach out to your manager
- Ask questions - your manager is there to support you

### Remember, speaking up about potential violations is crucial for maintaining our ethical standards.

### Managers - you play a key role in fostering integrity.

#### Your responsibilities also include:

- Encouraging team members to know and follow the Code
- Modelling ethical leadership
- Enforcing the Code consistently

## Upholding our standards

Following the Code protects you, your colleagues, and Venterra. Violations may lead to disciplinary action or even dismissal. We also expect our partners to adhere to our core values, principles as well as their contractual obligations.

By embracing our Code, we create a positive, ethical work environment where everyone can thrive.



## Decision Tree

If you answer "No" to any of the below, then your action could have serious consequences and you must not do it. Instead, contact your manager for advice or speak up via EthicsPoint.

- Is the action consistent with our Code, policies, or procedures?
- Would you be comfortable if your decision was publicised?
- Does the decision treat all parties involved fairly and without bias?
- Are you being truthful and providing all necessary information to relevant parties?
- Does this action contribute to the long-term success and sustainability of Venterra?
- Can you articulate the rationale behind your decision, and did you document the decision-making process?



# Speak Up

We are committed to conducting our business responsibly. This means with honesty and integrity and with a culture of openness, accountability, and high business ethics.

**Your role is crucial in maintaining our integrity. We count on you to speak up promptly if you suspect any misconduct.**

Any concerns can be raised in person, by phone, or in writing. If internal channels aren't suitable, you can contact EthicsPoint, an independent company. While anonymity is an option, please note it may limit our ability to investigate thoroughly.

## We protect those who speak up

Speaking up in good faith is always right, and we strive to create an environment that encourages openness. We have zero tolerance for retaliation, ensuring you can raise concerns confidentially and without fear. We treat any form of retaliation as a violation of our Code. If you believe you've faced retaliation, please inform us through the channels mentioned above.

### Internally

- Your line manager (or higher)
- The Venterra Director of HR
- The Venterra Group General Counsel
- The Executive Chair of Venterra Group Plc

### Anonymously

- Visit EthicsPoint via the link: [venterragroup.ethicspoint.com](https://venterragroup.ethicspoint.com) or the QR code:



Further details are presented in our Whistleblowing Policy, EthicsPoint Site, and on our Speak Up site located on the Compliance Hub.



## Your responsibilities

- You should raise concerns or report misconduct in good faith
- You must **not** use the Whistleblowing Policy for general complaints or personal grievances – these should be discussed with your line manager or HR
- You must **not** use the Whistleblowing Policy with malicious intent to harm others. If this is discovered to be the case, then you may be subject to disciplinary action.
- You must ensure that no one who speaks up in good faith suffers any retaliation





# Our Code





## We act Responsibly

We must conduct our business with integrity. This means that we prioritise ethical conduct and values in all interactions and decisions, even when faced with challenges or pressure to compromise. We must follow the law, build trust, foster positive relations, and create sustainable value.



# 1. Anti-Bribery and Corruption

Bribes are gifts, money, favours, or anything of value offered to influence someone to gain an unfair advantage. Facilitation payments are also bribes but given to public officials to secure or enhance administrative processes.

## Why it matters

Bribery and corruption undermine fair competition, damage trust, and can have severe legal and reputational consequences. Regardless of size, bribes are illegal and can result in fines, reputational damage, and imprisonment.

## Our position

At Venterra, we're committed to fair and ethical business practices. We do not tolerate bribery or corruption in our business, and we comply with anti-bribery and corruption laws and regulations. Your dedication to ethical conduct is essential to our success and integrity.

## Our expectations

We expect all our employees, suppliers, agents, and partners to:

- **Reject bribery:** Never offer, give, or accept bribes in any form
- **Refuse facilitation payments:** These are also bribes and are not permitted
- **Stay vigilant:** Be aware of situations that might involve bribery risks
- **Speak up:** Report any suspicions of bribery or corruption
- **Seek guidance:** Consult our **Anti-Bribery and Corruption Policy** when in doubt

For detailed guidance, please refer to our **Anti-Bribery and Corruption Policy**.

### \*Asked to give a Facilitation payment?

**Refuse:** Challenge the legitimacy of the payment and do not make the payment.

**Report:** Record the details of the situation and report it to Legal and Compliance or via our Speak Up resources.

**Safety first:** If you are being threatened and fear for your safety, then make the payment to get out of the situation. Contact your manager immediately once you are in a safe location and ensure the incident gets reported.



## Your responsibilities

- You must not give a bribe or facilitation payment.\*
- You must not make charitable or political donations on behalf of Venterra without following relevant procedures.
- You must not offer or receive money, gifts, kickbacks in relation to obtaining business benefit or awarding contracts outside approved remuneration arrangements.
- You must not induce or facilitate others to breach laws or regulations.
- You must not use personal funds or third parties to make payments that you are not authorised to make with company funds.
- You must know who you are doing business with
- You must report to your manager or via our Speak Up resources if you are asked to give any bribes or facilitation payments.



## 2. Gifts and Hospitality

Building business relationships often involves exchanging gifts and hospitality. However, we must be mindful of ethical boundaries.

### Why it matters

Gifts can sometimes be perceived as attempts to influence decisions unfairly, especially when dealing with public officials who face strict regulations.

### Our expectations

At Venterra, we allow reasonable exchanges of gifts and hospitality as part of normal business practices. To maintain our integrity, we expect all employees to:

- **Be transparent:** Record gifts and hospitality in our registers
- **Seek approval:** Obtain permission for items exceeding set thresholds
- **Avoid cash:** Never offer or accept cash or cash equivalents (e.g., gift cards)
- **Exercise caution:** Take extra care when interacting with public officials
- **Stay informed:** Familiarise yourself with our Gifts and Hospitality Procedure

When interacting with public officials, we're extra careful, as they often have strict rules about what they can accept.

Our **Gifts and Hospitality Procedure** offers full guidance. By following these guidelines, we build trust and foster positive connections.



### Your responsibilities

- Do not give or accept gifts and hospitality during tenders and bidding situations.
- Only accept gifts and hospitality that are legal, inexpensive, infrequent, and appropriate.
- Do not accept gifts and hospitality for friends and family.
- Record gifts and hospitality on the Gift and Hospitality Register incl. evidence of approval.
- Do not offer gifts and hospitality to a government official unless you are certain it is appropriate under local law.
- Never give gifts or hospitality with the intent of inappropriately influencing a decision.

**If you're ever unsure, don't hesitate to ask for guidance.**

**Your commitment to ethical practices is key to our collective success.**



# 3. Conflict of Interest

At Venterra, we value your integrity and trust your judgment. Sometimes, personal interests or relationships might seem to conflict with your professional duties. This is what we call a conflict of interest.

## Conflicts can arise when

- Personal interests clash with professional responsibilities
- Financial gains compete with company loyalty
- Outside relationships influence work decisions

## Why it matters

Unmanaged conflicts can erode trust, fairness, and integrity. They may lead to biased decisions that could harm our stakeholders and reputation.

## Our expectations

We trust you to act in Venterra’s best interests. This means:

- Recognising any type of conflict
- Disclosing them promptly
- Working with us to manage them effectively

By doing so, you help maintain our high ethical standards and preserve the trust our stakeholders place in us.

For more guidance, please consult our Conflicts of Interest Procedure and Related Parties Policy.

**Remember, transparency is key. If you’re unsure, don’t hesitate to ask for advice.**

**Your commitment to ethical decision-making strengthens our entire organisation.**

## Types of Conflict of Interest

- **Perceived:** Others may have a concern or suspicion, that a conflict exists even if there is no conflict.
- **Potential:** There is a risk that a conflict may arise in the future based on your current circumstances, relationships, or interests
- **Actual:** There is a clear and demonstrable conflict between your personal interests and professional responsibilities



## Your responsibilities

- You must always act in the best interest of Venterra.
- You must withdraw from decision-making that creates an actual, potential, or perceived conflict of interest.
- You must not work simultaneously for any of Venterra’s competitors, customers, or suppliers.
- Consult with your line manager or Legal and Compliance if you are in doubt whether such conflict exists.
- You must report any actual, potential, or perceived conflicts of interest in accordance with our **Conflict of Interest Procedure and Related Parties Policy**.



# 4. Political and Social Engagement

At Venterra, we maintain a neutral stance in politics while actively supporting our communities.

## Political engagement

- We don't support political parties or politicians financially
- We may engage in policy debates affecting our operations, but only through our External Affairs team
- You're free to participate in legal political activities personally, but please make it clear you're not representing Venterra, and our companies

## Community involvement

- We actively engage with local organisations
- We often partner with charities, schools, and community groups
- We particularly support initiatives promoting STEM subjects

## Our commitments

- All community engagements align with our **Social Investment Policy**
- The External Affairs department approves our social initiatives
- We conduct due diligence to ensure our charitable work is never perceived as bribery

For more details, please consult our **Government Relations Procedure** and **Social Investment Policy** found on the **Compliance Hub**.



## Your responsibilities

- You must make it clear that your personal views and actions are not those of Venterra.
- Do not use company funds or resources (incl. working hours) to support any political party or candidate.
- You must not engage in any type of lobbying activities unless approved in accordance with relevant procedures.
- If you are standing for public office, then consult and gain approval from your line manager and register the approval in accordance with relevant procedures.
- Register and comply with local laws regulating political participation.



Your role in this is crucial. By understanding and following these guidelines, you help maintain our integrity and positive impact in society.



# 5. Financial Crime

At Venterra, we're committed to ethical financial practices and legal compliance. We take a strong stance against all forms of financial crime.

## Key areas of concern

- **Money Laundering:** Disguising illegal funds as legitimate
- **Insider Trading:** Using non-public information for trading advantages
- **Tax Evasion:** Deliberately misreporting finances to avoid tax obligations

## Our position

We have zero tolerance for any form of financial crime. These activities can severely damage our organisation, stakeholders, and society at large.

## Our commitment

- We conduct all business transparently
- We strictly adhere to financial crime, anti-money laundering, and anti-terrorism laws
- We expect all employees and partners to uphold these standards

For detailed guidance, please refer to our **Screening and Due Diligence Procedure and Anti-Money Laundering Policy.**



- Requests to transfer payments to/from entities or countries not related to the transaction.
- Requests to make payments in currencies different to those presented in a contract
- Other Unusual Transactions
- Requests to make cash payments



## Your responsibilities

- You must complete all required training regarding financial crimes.
- You must follow our screening and due diligence procedures when engaging with suppliers and clients.
- You must be on the lookout for suspicious activities and not knowingly deal with criminals or the proceeds of crime.
- You must immediately report actual or potential suspicious activities that may be linked to financial crimes to Legal and Compliance or via our Speak Up resources. Failure to do so may constitute a criminal offence.



# 6. Accuracy of Records

At Venterra, keeping accurate records is the bedrock of our integrity and operations.

## They ensure:

- Transparency in all our activities
- Compliance with laws and regulations
- Trust among our stakeholders

## Why it matters

Precise records are vital for:

- Informed decision-making
- Effective strategy development
- Robust risk management
- Reliable reporting to investors and regulators
- Detecting and preventing fraud

## Our position

We maintain complete, accurate, and transparent records of all transactions.

## Our commitment

- We ensure all records are complete and accurate. This includes but is not limited to timesheets, sales records, invoices and expense reports
- We update records promptly and document changes thoroughly

**Remember - we have zero tolerance for fraud or misrepresentation in our records.**



## Your responsibilities

- You must keep complete and update records and ensure the information you provide to others is reliable
- You must ensure that your business transactions are accurately, fully, and transparently recorded.
- You must never falsify any document or distort facts.
- Never sign off documents unless authorised to do so. Please see our Subsidiary Governance Framework Policy and Delegation of Authority Matrix
- Record transactions as soon as possible after they have occurred and retain appropriate supporting documentation.
- Retain financial, accounting, and/or transaction records for as long as required to meet applicable legal and regulatory requirements.
- If you are informed of an impending internal or external investigation, then you must not destroy any records (incl. emails) unless you have been authorised to do so by the Legal Department.

**By upholding these standards, you play an important part in maintaining our organisational credibility and fostering trust with our stakeholders. Your diligence in record-keeping is key to our collective success and integrity.**





# 7. Working with Others

At Venterra, we believe in the power of positive relationships.

## Our values in action

We partner with businesses that share our commitment to honesty, integrity, and professionalism. Our daily interactions with colleagues, partners, suppliers, and clients are built on:

- Open communication
- Effective collaboration
- Shared goals

## How we ensure this

- Rigorous screening and due diligence before entering new partnerships
- Fair, unbiased selection of suppliers based on merit
- Clear expectations set through our Partner Code of Conduct

## Our position

We have zero tolerance for dishonest or unethical behaviour. This protects not just individuals, but all our businesses.

## Our commitments

- We uphold our values in all our interactions
- We follow our procedures when engaging with new partners
- We report any concerns about unethical behaviour

For more guidance, please consult our **Screening and Due Diligence Procedure, Sanctions Procedure, Conflicts of Interest Procedure** and **Partner Code of Conduct**.



## Your responsibilities

- You must treat others fairly, honestly, and with integrity at all times
- Ensure that all communication with others are clear, fair, and not misleading
- If you know of a mistake, then you correct it.
- You must not take unfair advantage of anyone through manipulation, abuse of seniority, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice.
- You will follow our screening and due diligence procedures.
- You will select vendors and suppliers based on merit and in a fair and unbiased manner.
- You will avoid or manage conflicts of interests.
- You will report unethical or illegal behaviour to Legal and Compliance or via our Speak Up resources.

**By working together with integrity, we build trust, enhance our reputation, and drive our collective success.**



## We are Collaborative and Responsive

We are committed to provide a safe, respectful and inclusive workplace. We prioritise ethical conduct and values in all interactions and decisions. By treating people right and encouraging teamwork, we embrace diversity and uphold human rights. We care for our community and promote sustainability.



# 8. Health, Safety, Security, Environment and Quality

At Venterra, the wellbeing of our people is our top priority. We're committed to safeguarding health and safety, ensuring security, maintaining high-quality standards, and protecting our environment. Our ultimate goal is zero harm across all operations.

We operate responsibly and sustainably and are always receptive to stakeholder needs and upholding the highest HSSEQ standards. This commitment extends to our contractors and partners, who must comply with applicable HSSEQ requirements.

## Our HSSEQ Policy is built on three main pillars which guide our approach to creating to a safe, sustainable workplace:

- Leadership Commitment
- Compliance
- Risk Mitigation

### Your role

- Understand and follow our HSSEQ policies
- Look out for yourself and your colleagues

For comprehensive guidance, please refer to our full **HSSEQ Policy**.

**Remember, safety is everyone's responsibility. By prioritising HSSEQ, we create a secure, sustainable workplace where everyone can thrive.**



### Your responsibilities

- You will commit to achieving our objective of an incident-free workplace and support our approach to continual improvement throughout our operations.
- You will cooperate and take responsibility and accountability for your actions, acting in accordance with legal requirements and policies.
- You will actively participate in training provided in support of the safe performance of work activities.
- You will speak up if you observe an unsafe or unhealthy working environment and support others who raise concerns.
- You will encourage other employees to conduct their work in a sustainable manner regarding protection of the environment and minimising waste of natural resources.
- You will cooperate with stakeholder requirements to ensure work is carried out in a controlled manner to a high standard of quality.
- You must report all accidents, injury, illness, or unsafe conditions immediately. Never assume that someone else has reported or will report a risk or concern.



# 9. Sustainability

At Venterra, we believe clean energy is key to unlocking human potential. Our vision is a world where people, businesses, and societies thrive without compromising our planet’s future.

## Why it matters

Our **Sustainability Strategy** is crucial because clean, secure energy play a important role in ensuring the long-term wellbeing of society and the environment. This approach not only benefits our stakeholders but also contributes to the wellbeing of society and the environment.

## Our position

We recognise the need to contribute to the global shift towards cleaner energy. By helping our clients operate more sustainably and ensuring that our own business practices align with environmental responsibility, we strive to make a positive impact through our efforts.

## Our commitment:

We are committed to three key areas:

- Helping the world to accelerate its transition to cleaner energy
- Enabling clients to improve the efficiency and sustainability of their operations
- Running our own business with discipline and rigour, including a strong commitment to sustainability.

These commitments guide our actions, ensuring we contribute positively to both current and future generations.

For a deeper understanding of our approach, please consult our **Sustainability Policy**. It outlines how we’re working towards a more sustainable future, balancing progress with environmental stewardship.



## Your responsibilities

- You will support a sustainable approach across the organisation.
- You will support in providing sustainable services and solutions to our clients to enable continued creation of clean and secure energy within the offshore wind industry.
- You will limit our environmental impact by driving our business activities to be aligned with the UN SDGs Framework and other reporting standards.
- You must adhere with legal and other key sustainability requirements.
- You should, where possible, support circular economy design within our own activities and that of associated value chains, supporting improved renewable solutions, reduced waste and low carbon alternatives.
- You will engage positively with communities and the stakeholders connected with our business activities.

**By embracing sustainability, we’re not just powering businesses - we’re energising a better tomorrow.**



# 10. Diversity and Equal Opportunity

At Venterra, we celebrate diversity as our strength. Our rich tapestry of thoughts and experiences drives innovation and success.

## Our position

We're committed to equal opportunity in all employment decisions, regardless of personal characteristics or background. This includes age, disability, gender, marital status, pregnancy, race, nationality, military service, religion, or sexual orientation.

## Why this matters

- When everyone feels valued, we all do better work
- Different viewpoints help us solve problems
- A welcoming workplace helps everyone succeed

Our commitment to diversity and inclusion isn't just about fairness - it's about excellence. When everyone feels valued and respected, we all achieve more.

## Our commitment

- We treat everyone fairly in hiring and at work
- We respect all ages, abilities, genders, races, religions, and backgrounds
- We don't allow bullying, harassment, or unfair treatment

Our workplace is built on respect and dignity for all. We have zero tolerance for discrimination, bullying, or harassment in any form. This includes offensive, intimidating, or disruptive behaviour.



## Your responsibilities

- You must treat others with care, courtesy, dignity, fairness and respect.
- Encourage and listen to others
- Be professional in the way you interact with colleagues, customers and business partners.
- Be aware of and do not perpetuate stereotyping, even jokingly.
- Be respectful of cultural differences.
- Base your work-related decisions on factors such as merit, qualifications, and performance.
- Do not intimidate or humiliate others
- Challenge behaviour that you find hostile, intimidating, or disrespectful
- Be a fair, responsible employee, committing to an equitable, inclusive, diverse and balanced approach.

**Join us in creating an environment where every voice is heard, every contribution matters, and everyone has the opportunity to thrive.**



# 11. Human Rights

We respect human rights in all our work. This means no child labour, forced work, human trafficking, modern slavery or unfair treatment of workers. This applies to our business and our suppliers.

## Why it matters

Respecting human rights is essential to maintaining the dignity and rights of all individuals. Upholding these principles not only fosters trust and fairness but also ensures ethical practices across our operations and supply chains. Protecting human rights benefits both our workforce and the communities in which we operate.

## Our position

We are committed to respecting human rights in everything we do. This means strictly prohibiting child labour, forced work, human trafficking, modern slavery, and any unfair treatment of workers—both within our business and across our supply chains.

## Our commitment

We align our efforts with the following United Nations Global Compact principles:

- Fair work practices
- No discrimination
- Respect for human rights

We recognise the importance of screening our suppliers to ensure these violations are not taking place within our supply chain.

If you see anything wrong, speak up. We'll listen and take action.

For more information, please check our **Anti-Slavery and Human Trafficking Policy**. It explains how to spot and report problems.



## Your responsibilities

- You must speak up if you know of or suspect any potential human rights abuse in our business or those of our business partners.
- You must complete your training on Modern Slavery
- You must respect human rights and strive to protect vulnerable people who may be affected by our business.
- You must follow our screening and due diligence procedure when engaging with suppliers.

**Everyone deserves to be treated fairly.  
Help us make sure this happens everywhere we work.**



# 12. Data Privacy

Data Protection laws provide individuals with several rights regarding the way their personal data is processed. Across Venterra, we may be entrusted with sensitive and personal information from our employees, customers, suppliers and partners – and we must ensure that we’re handling this responsibly and in line with regulatory requirements.

## Why it’s important

Mishandling data can harm our reputation and lead to serious consequences. More importantly, it breaks the trust others place in us.

## Our position

We take data privacy seriously. We protect the privacy of all individuals whose data we handle. This means securing personal data, maintaining confidentiality, and ensuring that data is only used in lawful, transparent, and fair ways. We comply with relevant data protection laws across all our operations.



Submit a Data Subject Request

## Our commitment

All personal data is treated as confidential information, and we have established a Privacy Framework that governs policies, principles, and procedures to be followed to ensure correct processing of personal data and data subject requests.

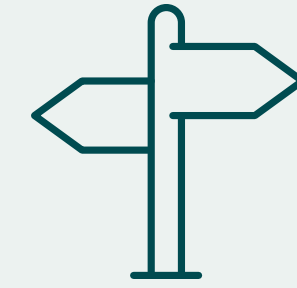
Want to know more? Check out our **Data Privacy Policy** which explains our 10 privacy principles and outlines our Privacy Framework, and its associated procedures.

**Remember, data protection is everyone’s job. Your vigilance helps us maintain trust and comply with laws. If you spot a potential data issue, speak up immediately. We’re all responsible for safeguarding the information entrusted to us.**



## Your responsibilities

- You must comply with the requirements of the Data Privacy Policy and related procedures.
- If you are a data owner, you must keep appropriate records of processing activities in accordance with our Data Mapping Procedure.
- If you manage a team, then ensure that your team members are aware of the responsibilities regarding data privacy.
- You must take a “think privacy” approach ensuring you follow our DPIA Procedure in the early stage of changes to data systems and management or collection of new personal data.
- Any requests from individuals using their rights must be identified and forwarded to [Compliance@venterra-group.com](mailto:Compliance@venterra-group.com) immediately in accordance with our Data Subject Request Procedure.
- Seek advice from your line manager, Data Protection Coordinator, or Legal and Compliance if you have questions or concerns.



## We are Innovative and Entrepreneurial

We are dedicated to building a culture of creativity and innovation, grounded in integrity and ethical conduct. Our entrepreneurial spirit drives us to be agile and commercially rigorous, ensuring we consistently deliver innovative solutions. We prioritise protecting our assets, maintaining confidentiality and ensuring fair competition. By following the law and upholding our values in all interactions and decisions, we build trust, foster positive relations, and create sustainable value for our community.





# 13. Protection of Corporate Assets

As a Venterra team member, you help protect our company’s resources. These include both physical items, such as equipment and facilities, as well as intangible assets, such as financial information, intellectual property and pricing and sales strategies.

## Why it matters

Protecting corporate assets is essential to maintaining the long-term success and integrity of our business. Whether physical or intangible, these assets represent the foundation of our operations, and their misuse, loss, or theft can have serious financial and reputational consequences.

## Our position

We are dedicated to safeguarding our corporate assets. All assets must be used responsibly and only for authorized business purposes, in line with our policies and procedures. We have zero tolerance for fraud and misconduct related to company property.

## Our commitment

- Ensuring that corporate assets are used only for legitimate and authorised business purposes.
- Preventing loss, theft, misuse, or damage of these assets.
- Employees and partners handle corporate assets responsibly and report any concerns.



## Your responsibilities

- Act carefully and appropriately to ensure corporate assets are not lost, damaged, or accessed by those without authority.
- Protect intellectual property and respect the intellectual property rights of others.
- Use a non-disclosure agreement whenever relevant.
- Obtain relevant approvals for engagements with staff and third parties in accordance with our Delegation of Authority Matrix.
- Ensure that documents which may legally bind Venterra and its Member Companies, and which deviate from our standard terms and condition or contracting principles, are sent to Legal for review prior signing.
- Do not remove, transfer, or alter corporate assets without authorisation.
- Return corporate assets that are no longer required for business purposes promptly.
- Report any loss to management and the Global IT Service Desk immediately.
- Be alert to potential fraud and report suspicious activity

**If you notice misuse, loss of corporate assets, or suspect fraud, speak up. Your vigilance helps keep Venterra secure and successful.**



# 14. Fair Dealing and Competition

At Venterra, we believe fair play isn't just good ethics - it's good business. Fair dealing involves ethical conduct in all business transactions, avoiding deceptive practices or unfair advantages.

## Why it matters

Competition law prohibits anti-competitive behaviours such as collusion, price-fixing, and monopolistic practices, creating a competitive and healthy marketplace for the benefit of our clients.

Fair dealing and free competition help to keep markets open as well as encourage innovation, efficiency and enterprise.

## Our position

We will never take unfair advantage through manipulation, hiding information, or any shady practices.

We don't tolerate dishonest behaviour and due care should always be taken when dealing with competitors, suppliers and clients to ensure agreements do not restrict, distort or impair competition.

If you're in any doubt, ask for guidance.



## Your responsibilities

- You must conduct all business activities with honesty, integrity, and fairness
- Never engage in price fixing, market allocation, customer allocation, supply restriction, output limitation, bid-rigging, or other anti-competitive practices.
- Avoid concluding agreements or sharing information with competitors that could influence their behaviour or ours.
- Do not exchange information with competitors on pricing, production capacity, R&D, cost structures, or intentions regarding customers, markets, or tenders.
- Avoid unlawful anti-competitive agreements with customers, suppliers, or any business partners.
- Refrain from inappropriate conversations or agreements with competitors.
- Attend and complete assigned training on time.
- Speak up if you suspect anti-competitive practices or unfair dealings, or if unsure about the legality of certain practices.
- Consult Legal and Compliance for guidance.

**By following these principles, you help Venterra stay ethical and competitive. If you see unfair practices, speak up. We're all responsible for keeping our business fair and open.**



# 15. Information Security

At Venterra, information is one of our most valuable assets. This includes data from our company, clients, partners, and colleagues.

## Why it matters

Information security protects the data we handle and store, and ensures the integrity of our IT infrastructure. It also maintains trust, ensures smooth operations, and safeguards our reputation.

## Our position

We are committed to safeguarding the information and data we handle by applying the C.I.A model—Confidentiality, Integrity, and Availability/Accessibility. This model help us ensure that our data is kept confidential, remains accurate and unaltered, and is accessible only to authorised individuals when needed.

We recognise that while technical safeguards are essential, the vigilance and responsibility of our employees are equally important.

**A security breach can harm our reputation and disrupt our work. Your actions matter – we should all consider ourselves to be guardian of our digital assets. By exercising caution in your digital activities, you help keep Venterra’s information safe.**

## Our commitment

We are committed to:

- Implementing appropriate technical safeguards to uphold the CIA model
- Ensuring employees understand their role in maintaining information security
- Fostering a culture of caution, integrity and honesty in the digital realm.

While we have technical safeguards, you are our best defence against digital threats. Your vigilance is key to our security.



## Your responsibilities

- Sensitive commercial information must be kept confidential and only be shared with authorised parties.
- Think twice before you click a link, search, browse, or download.
- Report any security incidents in accordance with relevant procedures.
- Only use the approved tools and software.
- Be vigilant against cyber-attacks and scams such as phishing and report immediately any incidents, including potential or actual losses of information or assets. Make sure IDs and passwords are secure.
- Do not use email to store documents that may need to be shared – Outlook is not a document management system.
- Follow IT and cyber security policies, including by using strong passwords on your computers, not accessing Venterra data on unsecure or public servers, and keeping your computer locked when not in use.



# 16. Sanctions and Trade Compliance

We're committed to responsible global trade. This means following all sanctions and relevant import and export control laws.

## Why it matters

These laws restrict who we can do business with and what we can export. Breaking them can lead to hefty fines and even jail time.

## Our position

We are committed to ensure that all our transactions comply with all applicable international sanctions, embargoes, and trade restrictions imposed by relevant regulatory authorities.

## Our commitment

- We comply with rules from the UN, EU, US, and other authorities
- We carefully assess risks in all our international dealings
- We follow our screening and due diligence procedures and do not hesitate to seek more information or advise whenever required.

For more guidance, check our **Sanctions Procedure**, **Screening and Due Diligence Procedure**, and our **Country Presence Procedure**.



## Your responsibilities

- Know who we're doing business with. Before retaining any third party, you must complete the Sanctions and Screening and Due Diligence procedures, as we are prohibited from dealing with parties that are subject to sanctions.
- Be aware of restricted countries. Before engaging in business in a new territory you must complete process presented in the Country Presence Procedure.
- Before importing or exporting any products, software, technologies (including technical data), or services, contact a member of the Legal and Compliance Department to ensure that the transaction complies with the applicable import/export laws.
- Familiarise yourself with the specific sanctions and embargoes that apply to the countries or entities with which the company conducts business.
- Do not engage in any form of business activity that violates sanctions and embargoes.

**Your support helps keep Venterra compliant and protects our global reputation. If you spot any concerns, speak up immediately.**



Find out more



We engineer, build and support major wind farm developments across the entire wind farm lifecycle

[www.venterra-group.com](http://www.venterra-group.com)  
[info@venterra-group.com](mailto:info@venterra-group.com)