

# How we act in Edisun Power: Code of Conduct

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[www.edisunpower.com](http://www.edisunpower.com)

## Our corporate culture

Edisun Power's corporate culture is guided along our four main characteristics.

### Responsibility



Do business in a professional and ethical manner



Strive for sustainable success



Support, respect and foster human rights in daily business



Always play fair and by the rules

### Integrity



Do not use insider information for trading



Ensure true and fair accounting and reporting



Avoid any potential conflicts of interest



Protect our intellectual and physical property at all times



Never tolerate any form of bribery & kickbacks

### Safety



Everyone is the first line of defense of our cybersecurity



Privacy of data is always respected and protected



Promote and encourage diversity and inclusion



Health and safety are everyone's concern

### Engagement



Pursuit of excellence is our way of working



Communicate with respect and openness



Use social media responsibly and respectfully



See something, say something!



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## Introduction

Edisun Power AG is an independent company that finances and operates solar power plants in a number of European countries. Edisun and its investors make a valuable contribution to ensuring ecologically sound energy supply. This approach forms the basis for a society with strong future prospects that reduces consumption of fossil fuels and makes sustainable use of renewable energy.

Our future growth and success depend on the trust of all our stakeholders. This Code of Conduct was developed to protect the trust and reputation we have built since our inception.

The Code aims to establish and standardize a minimum group-wide compliance to local laws and the highest ethical standards. Thus, this Code should be read in conjunction with local policies wherever the company operates.

If you have further recommendations or ideas to improve this Code of Conduct, please contact our CFO René Cotting at [rene.cotting@edisunpower.com](mailto:rene.cotting@edisunpower.com).

## Letter

Dear Colleagues

Each day of our work at Edisun Power is full of opportunities and challenges. Some we will master well immediately, others we are still in finding the best way forward. In all of our activities and decisions we need to make us more effective and efficient in an ethical way as a great team. Therefore, we have to be responsible, integer, safe and engaged.

As an important enabler of our Vision and Mission, we felt that it is important to document the culture of Edisun Power and how we would like you all to behave in our current day-to-day world. We developed the new Code of Conduct to be easily understood in the different languages we speak and to provide real life examples of the challenges we may face.

Our ambitions are to remain a respected and contributing member of society and, through our business activities to have a positive impact on the environment. We strive to be an attractive and fair employer. Our Code is not just for you as employees - we expect ethical business practices from our customers, suppliers and business partners too.

The Code addresses you as an individual to think and act in a balanced short- and long-term view for the business, its stakeholders and shall enable you to highly perform. In all cases we want to act in the right spirit and being compliant to laws and rules.

As you go about your daily work, keep in mind the key principles and rules described in our Code. And remember, We Talk Real – if you see a violation of our Code of Conduct, please speak up. Thus, be empowered in contributing to engage in a pro-active and ethical manner to positively impact the next decade of Edisun Power.

**WE BRING THE SUN.**



**Horst H. Mahmoudi**  
Chairman of the Board & CEO



**Dr. René Cotting**  
Chief Financial Officer (mandated)

## Vision and Mission

**We strive to be the leader in originating sustainable investment opportunities**

We originate attractive and sustainable investment opportunities in high performance, renewable energy assets based on innovative technologies & our expertise in developing, managing and operating the complete value chain

We **BREAK NEW GROUND**

We **LEAD THE WAY**

We are **COMMITTED**





**Our corporate responsibility:**  
Only sustainable success  
is success.

Responsibility  
Integrity  
Safety  
Engagement

## How we do business

**We seek competitive advantages through superior performance, knowledge, and products. We are committed to operating our business profitably, maintaining a strong financial base, and keeping our risks at an appropriate level while making every effort to minimize our environmental impact. Making a profit should never be justification for not complying with laws, taking unreasonable risks, or not assuming responsibility. Inappropriate business practices will not be tolerated.**

### Expectations

- We protect our trade secrets, and we respect the trade secrets of others.
- We treat with our customers, suppliers, and competitors fairly.
- We do not use unfair advantages through dishonest business practices, manipulation, abuse of privileged information, or concealing information.
- We seek to ensure compliance with all applicable local and international laws.
- We seek to ensure compliance with all legally mandated trade sanctions and embargoes.
- We never want to make unrealistic promises, and we honor our commitments.
- We do not take undue risk for the sake of profits.
- We conduct business sustainably, at highest quality and expect the same from our suppliers.

### Q&A

**Q:** Donald, a commercial manager for a key account, has an opportunity to finalize a highly profitable project. The customer requires documentation confirming no 'conflict minerals' nor child labor were used in producing the solar modules. Confirmation and Documentation is not easily accessible. How should Donald handle this situation?

**A:** Several countries require in local law that companies shall perform due diligences ensuring no conflict materials nor child labor were used.

It is important to be transparent with our customers, and Donald should communicate the obstacles he has to overcome to complete this request. Donald needs to inform the supplier that the parts need to meet international laws and standards and that he must provide documentation confirming the parts are indeed compliant. If a supplier cannot provide proper documentation, be transparent with the customer, address the issue with your supply manager and consider alternative suppliers.

### Remember...

- Doing business professionally and ethically is one of our core values.
- Behavior that can damage our brand will not be tolerated.
- If you are unsure how to react in a business situation, talk to your superior and colleagues to discuss the best way to respond to a customer or supplier



## How we promote corporate sustainability

**At Edisun Power, we are committed to Corporate Sustainability, and we follow the Environmental, Social, and Governance (“ESG”) principles in our daily business. We see ESG as a strategic, intrinsically motivated priority. While maintaining profitability, our business model accentuates environmental and social needs. We ensure that these principles are lived within Edisun Power and are shared by our leaders, suppliers, customers, business partners, and other stakeholders.**

### Expectations

- We measure success based on the development and maintenance of our relationships with our colleagues, our customers, suppliers, and business partners in a sustainable and socially respectful manner.
- We recognize that on an individual level, each Edisun Power employee is responsible for ensuring that appropriate actions are taken to promote and live ESG principles.
- We foster fair and ethical business practices and partnerships.
- We need to be aware of and raise concerns within our organization over suppliers and customers whose ESG ideals and practices are not aligned with Edisun Power.
- We will use energy in the most efficient way and work towards greenhouse gas reduction.
- We work towards reducing the environmental and social footprint in our value chain.
- To strengthen the social fabric, we are an active member in communities in which we live and do business.
- For further information on ESG, visit relevant information, such as [webpage](#).

### Q&A

**Q:** Tweety has identified a new potential supplier for Edisun Power. However, during additional research she finds the supplier has a long record of non-environmentally sound disposal of waste. Should Tweety proceed to engage with this supplier?

**A:** No, she should not. Environmental protection is a key pillar of our business and we expect all existing and new stakeholders to act along the high ESG standards we have set ourselves.

### Remember...

- Hold colleagues accountable when you see improper practices that could lead to environmental detriment.
- Create habits that promote environmental health.
- Seek out projects within your business unit that promote sustainable and environmentally safe practices.
- Bring improper practices from any business partner of Edisun Power to the attention within the organization.
- Only sustainable success is success.

## How we respect human rights

**At Edisun Power, we support and respect the principles contained in the UN Guiding Principles on Business and Human Rights (UNGPs) and other internationally recognized principles regarding human rights. We expect that our business partners will comply with similar standards. In particular, to provide equal opportunities to all employees, to not tolerate harassment or maltreatment at the workplace, to respect employees' privacy, to not participate or benefit from any forced labor, to respect the maximum working hours in accordance with applicable laws, to recognize the freedom of association, to prohibit child labor, and to ensure a safe and healthy work environment.**

### Expectations

- We are committed to respecting human rights at Edisun Power and expect the same from our suppliers and other business partners.
- We do not tolerate the use of child or forced labor, nor exploitation of children in any of its global operations and facilities.
- We conduct due diligence to ensure that our suppliers and business partners respect

internationally recognized principles regarding human rights. We do not tolerate violation of human rights and will take appropriate steps.

### Q&A

**Q:** Sylvester wants to engage a supplier who provides competitive products. However, this supplier was recently found to use child labor. Should he enter into a contract with this supplier?

**A:** Sylvester should not engage this supplier. Competitive products are never a justification for violation of human rights. We do respect human rights and require the same from our suppliers.

### Remember...

- Support, respect and foster human rights in our daily business.
- Monitor the human right practices of our suppliers and other business partners on a regular basis.
- Take appropriate steps if we face a violation of human rights.





**Our professional integrity:**  
We play fair and always by the rules.

Responsibility  
Integrity  
Safety  
Engagement



## How we prohibit using insider information for trading

**During the performance of their work, Edisun Power employees may have access to sensitive insider information. Insider information is material non-public information about Edisun (listed in Switzerland SIX) or its also publicly listed business partners (such as financial data, acquisitions of a company, etc.) which, if made public, could have a significant impact on the price of the securities, or which a reasonable investor would consider important in deciding whether to purchase, hold or sell securities. Insider information is considered non-public until it has been effectively disclosed to the public, such as in a press release, newspaper, or on Edisun's (or our business partners') external website. As provided by law, insider information must not be misused. Failure to comply with these rules may lead to disciplinary measures and penalties.**

### **Expectations**

- We keep insider information confidential.
  - We do not provide "tips" or otherwise make unauthorized disclosure of insider information to any non-insiders, whether or not within Edisun Power.
  - We may not buy, sell, or otherwise engage in transactions in Edisun's or our business partners' securities during the period when we have access to insider information.
- We must not solicit, influence or counsel any person or company to recommend, deal or execute transactions in securities about which we have material, non-public information. In addition, care should be taken so that such information is kept secure.
  - Penalties for trading while in possession of or communicating material non-public information can be severe, both for individuals involved in such unlawful conduct and their employers.

### **Q&A**

**Q:** A colleague unintentionally forwards to Lola documents relating to a potential acquisition of a competitor by Edisun Power. Is Lola allowed to trade securities of Edisun or the other company?

**A:** No, she is not. Such a transaction will most likely have a material effect on the price of the securities and therefore qualifies as insider information. Everyone in possession of insider information, even if received by coincidence, must follow the rules regarding insider information.

### **Remember...**

- Do not disclose insider information in any way.
- Do not trade securities based on insider information.
- Contact our Compliance or Legal Office if you are in doubt whether the insider rules are applicable or not in a certain situation.

## How we ensure true and fair accounting and reporting

**At Edisun Power (as mandated by its Board of Directors), we accurately record all our financial transactions, assets, and liabilities. This enables us to report our finances in a true and fair view and to comply with the laws and regulations that govern our accounting principles and financial reporting. This includes compliance with anti-money laundering laws, applicable tax laws, and custom trade and export controls. A false, fictitious or misleading accounting entry or statement can jeopardize the trust of our shareholders, debt investors, and the capital markets, resulting in loss of or damage to our reputation and assets, and may result in criminal penalties.**

### Expectations

- We ensure that all business transactions are recorded according to our accounting principles.
- We follow the delegation of authority rules.
- We do not forge or destroy accounting records or their supporting documentation.
- We report suspicious transactions and are attentive regarding suspicious emails, especially those that contain payment requests and requests for financial information.
- We never make false or misleading statements in any financial report, expense claim, or investment proposal.
- We follow the tax and compliance rules of each country in which we operate.
- We never share financial information with internal or external parties without proper authorization.

### Q&A

**Q:** A supplier asks Edisun Power to make the next payment to a new offshore bank account in a destination known to be a tax haven. As an incentive, they offer a 5% discount on the purchase. Should Edisun make the payment?

**A:** No. If Edisun Power makes the payment without further investigations, it might help the supplier with money laundering and tax evasion. Since we would even get a discount, this could result in serious financial and legal consequences for Edisun Power. EP needs to report this internally as a suspicious transaction.

### Remember...

- Never share any financial records, information, or data without proper authorization.
- Do not hesitate to report a suspicious transaction.
- Do not falsify, forge or destroy accounting records or related documentation.
- Keep records for at least 10 years.
- The trust of our shareholders, our debt investors, and the capital markets are essential for our strategic goals and access to financial resources.



## How we deal with conflicts of interest

**A conflict of interest occurs not only when the personal interests of an employee conflict with or reasonably appear to conflict with the interests of Edisun Power. In that case, it can be difficult for the employee to still act in the best interests of Edisun Power. An employee must therefore avoid a situation where their actions might create a conflict of interest, whether it is actual, potential, or perceived. Conflicts of interest can have many forms. For example, external engagements (e.g., external employment, acting as a consultant, external mandates) that may interfere with our responsibilities at Edisun Power, or receiving gifts or other favors from suppliers, customers, and competitors which may, or may reasonably be perceived as influencing our business decisions.**

### **Expectations**

- We recognize when there is an actual or potential conflict of interest.
- We avoid situations that are or may reasonably be perceived to be a conflict of interest.
- We are aware that conflicts of interest can arise in many ways. If in doubt, we seek advice internally.
- We must not use our position at Edisun Power for our personal benefit or for the benefit of close family members or other closely related persons.
- We must immediately disclose any conflicts of interest.

### **Q&A**

**Q:** Elsa and her team are interviewing Elsa's brother-in-law for a position in her team. What should she do?

**A:** Elsa must promptly disclose that she is related to the job candidate and discuss further steps internally.

**Q:** Smartenergy is one of the major suppliers of SPVs to Edisun Power. Who shall decide finally on the purchase price and agreements for Edisun Power, considering that also Smartenergy is represented on Edisun Power's Board?

**A:** Any matters where a conflict of interest could occur shall be decided by the independent Board members of Edisun only. The Smartenergy representatives on the Board of Edisun should abstain from their voting right.

### **Remember...**

- Avoid any situation in which your personal interest conflicts or appears to conflict with Edisun Power's interest.
- Inform your leader immediately if there is a conflict of interest to resolve the situation.
- Consult your leader or Legal Department if you are in doubt whether there is a conflict of interest.

## How we comply with competition laws

**We at Edisun Power are committed to complying with applicable competition laws. Also known as anti-trust laws, competition laws aim to prevent anti-competitive behavior in the market. These laws shall ensure that the market is fair for consumers and producers. Anti-competitive practices have the objective or the effect of preventing, restricting, or distorting competition. Along with reputational damage, companies that exhibit this behavior may find their agreements unenforceable, risk being fined heavy penalties, and faced with lawsuits.**

### **Expectations**

- We are committed to complying with competition laws to ensure a fair market.
- We expect that each employee involved in the relevant business understands the principles of competition laws.
- We expect that our suppliers will adhere to competition laws.
- We seek legal guidance if we are not sure whether a behavior is compliant with competition laws.

### **Q&A**

**Q:** Rick's friend Gaston works in the sales department of an Edisun Power competitor. Both Edisun Power and Gaston's company develop and sell SPVs/Solar PV. Rick meets Gaston at an informal lunch. Gaston wants to discuss the companies' prices per MWp and wants to convince Rick to raise prices for SPVs sold at RTB so they can realize a bigger sales margin. What should Rick do?

**A:** Rick must immediately stop the discussion before any prices or price increases are revealed. Competitors are not allowed to exchange and agree to fix prices or raise prices. This is also the case when the "agreement" is not in writing. Under competition law, "agreements" encompass not only formal written agreements but also any oral contract, informal and gentlemen's agreements.

### **Remember...**

- Comply with applicable competition laws whenever you are dealing with competitors, suppliers, customers, distributors, or other trading partners.
- Violation of competition laws could have significant negative consequences for Edisun Power and you personally - up to imprisonment.
- Proactively seek legal advice within Edisun Power if you are unsure of whether a behavior is compliant with competition laws or not.

## How we prevent bribery and improper advantages or kickbacks

**Edisun Power does not tolerate any form of bribery or granting improper advantages by its employees or business partners. We do not offer, promise, give, accept or solicit an improper advantage as an inducement (e.g., money, gifts, loans, fees, rewards, or other advantages) for an action that is illegal, unethical, or a breach of trust or that could raise concerns about the personal integrity of Edisun Power employees.**

**We also don't ask suppliers to give us personal benefits or kickbacks as a condition to get a benefit or contract. Bribes and improper advantages can result in criminal and civil actions against Edisun Power and the employees involved as well as in reputational damages.**

### Expectations

- We understand that many countries have strict laws regarding bribery and granting improper advantages.
- We never accept any form of bribe or improper advantage.
- We do not do business with partners who tolerate bribery or granting improper advantages.
- We may give or receive gifts or entertainment only where they are appropriate, reasonable and where they do not or do not appear to influence the recipient's decision.
- In the case of doubt please get permission from your Country manager or the compliance office.

### Q&A

**Q:** A supplier of Edisun Power gives Ticker, an employee at Edisun Power, tickets for the Football Champions League Final which are expensive and hard to get. Is it OK to accept the tickets?

**A:** No, Ticker should not accept these tickets. The tickets are beyond what is considered a reasonable gift. Accepting such tickets from a supplier or other business partner is likely to be considered a bribe or improper advantage.

**Q:** A member of a municipality requests a personal benefit and payment for signing or accelerating getting a permit licence. What shall you do to not jeopardize the RTB date promised to reach?

**A:** You should not pay any bribe and rather report the case to your Country manager or the compliance office immediately.

### Remember...

- Never tolerate any form of bribe or improper advantage.
- Turn down any offers, gifts, etc. that could affect your personal integrity or influence your decisions.
- Don't ask for personal benefits as a condition to accept any supplier or contract (Kickbacks)
- Contact your Country Manager or the Compliance Office if you're in doubt whether a situation could qualify as a bribe or improper advantage.





**Our safety & confidentiality:**  
We ensure protection of health,  
data, and property.

Responsibility  
Integrity  
Safety  
Engagement





## How we ensure information and technology security

**It's an unpleasant fact of modern life that cybersecurity must be a top priority for individuals and businesses. A successful cyber-attack can shut down a business, resulting in lost jobs, missed deliveries, and a permanently stained reputation. The good news is that this can be greatly mitigated by understanding that every single one of us is responsible for keeping Edisun Power secure. Our employees must stay vigilant and use appropriate caution and common sense.**

### Expectations

- We are vigilant and cautious.
- We think before we click (especially Approve Login, Send, or Download).
- We don't use our Edisun Power password anywhere else and never share it with anyone.
- We keep our PCs and devices locked when we step away from them.
- We work with IT to bring new technology into the company.
- We report suspicious incidents immediately to our supervisor and Director of IT.
- We actively participate in cybersecurity and user awareness training.

### Q&A

**Q:** Anakin received a very well-forged phishing email and clicked on a link. It asked him to log in, and he provided his Edisun Power password. Then he realized that the site looks suspicious and that he may have made a mistake. What shall he do?

**A:** Anakin changes his password and immediately notifies the Director of IT and his superior about the incident. This gives Edisun Power the best chance to assess whether the attacker did any damage and to prevent harm.

Mistakes happen to anyone. Talking Real and Collaborating saves us in this case.

**Q:** Cinderella was given a shiny new USB stick by somebody at a conference. Is it safe to use?

**A:** Vigilance tells her to assume that it is not safe. Free or found USB sticks are some of the most common ways attackers use to introduce malicious software into corporate networks.

### Remember...

- You are the first line of defense against cybersecurity attacks.
- Most successful attacks come from social engineering, i.e., tricking employees into taking actions that compromise the network (e.g., opening a malicious attachment or link, urgently demanding a change to bank account information).
- Email is like sending a post card in the mail: You don't know which way it takes on the internet, and anyone it passes can read it if they want.



## How we ensure data privacy

**Personal data is any information that relates to an individual person who can be directly or indirectly identified. This may include their name, email address, location data, IP addresses, gender, or ethnicity. Data protection laws aim to control how personal data is used by organizations, businesses, or the government. In our daily business, we process personal data following applicable data protection laws, e.g., the Swiss Data Privacy Act or the European General Data Protection Regulation (GDPR). Violation of applicable data protection laws can result in high fines or criminal prosecution.**

### Expectations

- We collect, process, transfer, make available, store and otherwise use personal data per applicable data protection laws.
- We also require compliance with applicable data protection laws from our suppliers, customers, and other business partners.
- We handle personal data in accordance with applicable data protection principles, such as lawfulness, fairness, transparency, limitation of purpose, data minimization, accuracy, storage limitation, integrity, and confidentiality and accountability.
- We respect the individuals' applicable privacy rights.
- We handle data securely by implementing appropriate technical and organizational measures.
- We report security incidents involving personal data immediately to your supervisor and to [codeofconduct@edisunpower.com](mailto:codeofconduct@edisunpower.com).

- We do not keep personal data longer than is necessary for the collected purpose and as required by applicable laws.
- We comply with the applicable restrictions on transferring personal data outside of the country where the personal data originated.

### Q&A

**Q:** Olaf's password for his Edisun Power email account has been stolen. What should he do?

**A:** Using the stolen password, an unauthorized person could potentially access personal data stored in Olaf's email accounts. Olaf must immediately report this incident through the appropriate channels as provided in Edisun Power internal data privacy policies.

### Remember...

- Be familiar with the principles of data protection laws and the Edisun Power policies on data protection laws.
- Be diligent with the personal data of others and to treat it according to applicable data protection principles.
- Comply with applicable data protection laws.
- Reach out to Edisun Power's Compliance Office ([codeofconduct@edisunpower.com](mailto:codeofconduct@edisunpower.com)) if you have questions or concern.

## How we protect intellectual and physical property and confidential information

**While doing business, we may deal with our own confidential information and intellectual property but also with that of third parties. These includes patents, trademarks, copyrights, and any non-public information such as business secrets, engineering ideas, designs, and financial data. We take appropriate measures to protect our own intellectual property rights and confidential information and those of third parties. This includes the protection of our own and third-party physical property. Our continued success depends on the careful use of intellectual and physical property and confidential information.**

### Expectations

- We protect our own intellectual property and confidential information through appropriate measures.
- We share confidential information with employees and with external parties only if needed for the course of the business.
- We are careful in the selection of our business partners.
- We implement appropriate measures when we need to share confidential information with a third party, which includes entering into a proper non-disclosure agreement.
- We also take appropriate measures when protecting our own and third-party intellectual property, confidential information, and physical property (e.g., password protection of computers, third-party physical property).
- We respect the intellectual property and confidential information of third parties.
- We do not tolerate the violation of our intellectual property rights, e.g., our trademark rights or designs of PV plants, and will take appropriate legal steps.
- We continue to respect any obligations regarding confidentiality and intellectual property even after the termination of our engagement.

### Q&A

**Q:** Winnie faces an interesting business opportunity with a third party where he needs to disclose Edisun Power business secrets about solar modules performance. What should he do next?

**A:** Before disclosing any Edisun Power business secrets to a third party we must enter into a proper non-disclosure agreement with the third party, in order to make sure that confidential information is only used for the intended purpose and not misused in any way. In any case, Winnie should be careful in the selection of his business partners. Even if a non-disclosure agreement is entered into, if the other party is not a serious partner, an inappropriate disclosure of confidential information can only be remedied by taking legal steps which may be costly and difficult to enforce.

### Remember...

- Protect our own intellectual and physical property and confidential information and respect that of third parties.
- Share confidential information only if needed in the course of business.
- Do not discuss any business projects in public (e.g., on trains or airplanes).
- Seek advice from the Legal Department in case you have any questions, doubts, or concerns regarding the handling of intellectual property and confidential information.

## How we ensure health and safety

**In the spirit of Edison Power sustainable practices, we provide a safe and healthy environment for our employees and stakeholders. We promote occupational and personal health to ensure a healthy life at and away from the workplace. We have adopted robust safety practices to reduce risks. Our top priority is to prevent accidents and injuries, including during work-related travel.**

### Expectations

- We are familiar with our safety rules and take responsibility for following them during our daily operations, travels to work, and visits.
- We follow without exception applicable local laws, government regulations, and policies relating to a safe and healthy workplace.
- We take all measures to eliminate hazardous practices.
- We are continuously improving our safety practices through scheduled reviews and adjusting our standards when necessary.
- We take responsibility for the safety of our visitors within our facilities.
- We respect the immediate and long-term health of others.
- We make sure not to introduce unnecessary health and safety risks.
- We promote a healthy balance between work and private life.

### Q&A

**Q:** Merida sees that Terry, a worker of our EPC, is not lifting the modules in a protective manner for his back. What should Merida do?

**A:** Remember, We Talk Real. Merida should remind Terry to properly lift the modules in order to prevent damages at his back.

**Q:** Daisy breaks down at her work place and it seems that the heart stopped to beat.

**A:** Anyone observing it needs to act immediately: Run to Daisy analyzing her condition fast, call the emergency number, take the closest defibrillator to use (i.e., devices that send an electric pulse or shock to the heart to start beating again) and start applying the first aid measures.

Make sure that you are trained to prepare yourself for such a case.

### Remember...

- Health and safety are everyone's concern.
- Apply the rules defined by Edison Power and in each Edison Power Unit, including the rules for visitors, to protect all of us from accidents or injury.
- Recognize improvements in health and safety conditions as benefits, and to raise awareness when such conditions are lacking.





## **Our personal engagement:**

We are a diverse team with support and respect for each other.

Responsibility  
Integrity  
Safety  
Engagement

## How we improve

**We are committed to excellence through the continuous improvement of our practices, processes and know-how. We consider mistakes as a chance to improve. We periodically review our current and past performance, including lessons learned, to achieve our common goals. With the adherence to the principles outlined in this Code of Conduct we strive towards excellence. Continuous improvement is the backbone of Edisun Power.**

### Expectations

- We ensure that each employee of Edisun Power understands Edisun Power's Code of Conduct.
- We are committed to ensure that the Edisun Power Code of Conduct is consistently followed throughout the whole company.
- We regularly review our performance, practices, and processes to improve them.
- We continue to improve our services and products for our customers.
- Our improvements contribute to the satisfaction of our customers, the strengthening of our partnerships with suppliers, our company and our colleagues.
- We promote cross-cultural teamwork across our Business Units and thereby acknowledge the cultural differences.
- Together, we participate in continuous improvements on a daily basis: through teamwork, through collaboration, through the pursuit for excellence.
- We foster a culture where we live our guiding principles.
- We encourage our employees to develop or improve processes and then create a prototype to share with the organization. We Experiment!

### Q&A

**Q:** Simba has an idea for improving a quality process, but he does not know with whom or how he can share it.

**A:** Improvements are always welcome at Edisun Power. Simba can propose this improvement idea to his supervisor during a conversation. After that, it will be decided whether or not to work on this idea with a specific team. Any improvement that can be implemented immediately should be done and not delayed.

### Remember...

- View mistakes as opportunities for improvement.
- Collaborate with colleagues to improve our practices every day. Pursuit of excellence is our way of working.
- Our improvements benefit our daily work.



## How we communicate

**Edisun Power’s reputation as a reliable business partner has been built over many years. Our employees and stakeholders with whom we interact with come from many different countries, backgrounds, and cultures. In both internal and external communications, we maintain the highest standards to reflect our professionalism and our responsibility. From seniors to subordinates, customers, and suppliers, We Talk Real!**

### Expectations

- We protect confidential information and only share it with authorized parties.
- We require that all social media postings must not negatively impact Edisun Power reputation in anyway.
- We strive to address all miscommunications with those involved to ensure 100% transparency.
- We expect that all discussions take place in a respectful manner.
- We as a multicultural company, communicate in different languages and different time zones. We therefore need to be attentive to the language, the time, the channel, and our recipient when we communicate.
- Choose the appropriate communication channel. Phone, e-mail, physical meeting.
- **Bad news or criticism should as a rule rather be told orally first and not via mail.**

### Remember...

- Your words and actions are not only a direct reflection of yourself but a reflection of those who present you and those whom you represent.
- We all make mistakes. When mistakes happen, own up to, communicate, and remedy them.
- Before sending out an email or external communication, review it to ensure you are properly portraying your message.
- Responsiveness is key to customer appreciation.

- Be aware of the language used, the time zone, and the culture of our recipients. Without these considerations, our message could be misunderstood.
- Appropriate communication is one way to protect our name.

### Q&A

**Q:** Megara and Speedy from different departments have a disagreement about Megara’s interpretation of an internal process. What could Speedy say without offending her?

**A:** Speedy could explain to Megara how he understands the process. They should be respectful of each other’s view and try to discuss it and find the best way to solve their misunderstanding and in that way improve the internal processes.

**Q:** Daffy, an employee of Edisun Power, is constantly talking to his team members negatively about company-related matters and makes thereby false statements about Edisun Power. What should Daffy’s team members do?

**A:** His team members should respectfully point out to Daffy that his behavior is not appropriate. As an employee of Edisun Power, Daffy should speak and act cautiously and appropriately about the company. Daffy’s statement and action will influence the company’s image and reputation, both internally and externally.

## How we conduct ourselves on social media

**Edisun Power recognizes the many beneficial uses of social media, although, as with many things, there is a right and wrong way of using these platforms. If you choose to use social media platforms, do so responsibly and respectfully.**

**In today's ever-changing world, posts that are well thought through are essential to maintaining an individual's online integrity. Remember that whether it be a personal or professional post, the content that you post will always follow you.**

### Expectations

- We always communicate responsibly and respectfully on social media.
- We always speak for ourselves in our personal social media profiles.
- We require that all social media postings, including posting of pictures, must not negatively impact Edisun Power's reputation in any way.
- We promote Edisun Power's capabilities according to our values and culture.
- We respond to comments on our posts on professional networks promptly and when it is appropriate and provides value.
- We respect copyrights.
- We protect confidential information.
- We use social media to network and grow our professional profile.

### Remember...

- External channels of Edisun Power are only presented by the Edisun Power management and marketing department.
- Always proofread your posts so that your intentions are correct and cannot be misunderstood or misinterpreted.
- With being restricted by characters counts on social media, be aware that your opinions may not allow others to draw the connections or

conclusions necessary to properly understand. Ensure to validate your opinions by elaborating how you personally have drawn the conclusions.

- Third parties may incorrectly perceive your opinions expressed on personal social media as being shared by Edisun Power.

### Q&A

**Q:** Jack would like to use his Facebook profile to promote Edisun Power's Solar PV events. Is this acceptable?

**A:** If you post about Edisun Power on your own page, you expose other personal posts to colleagues, customers, and suppliers. We encourage you to use social media but ask that you keep your professional and personal profiles separate. Remember, your personal opinions and views could be misinterpreted as those of Edisun Power's.

**Q:** Mufasa would like to use his LinkedIn profile to promote Edisun Power's strategy. Is this acceptable?

**A:** Confidential information should not be shared on your social media account. LinkedIn is a good communication channel to promote Edisun Power's events and official messages.

## How we hire and employ

**Trust, leadership, social responsibility, entrepreneurship, and credibility are the values of the Edisun Power culture. They form the roots for our guiding principles on which we base our actions: “Be responsible, integer, safe and engaged”. All our employees are a vital part of the culture we live through our values. It is everyone’s job to fill them with life.**

### Expectations

- We comply with applicable local employment laws.
- We pursue a long-term human resources policy that begins with recruitment and onboarding and is sustained by an integrative work environment and supported by the continuous development of our employees.
- We create equal opportunities regardless of factors such as race, religion, color, sex, gender identity, sexual orientation, national origin, citizenship status, uniform service member status, pregnancy, age, genetic information, disability, or any other protected status in accordance with applicable laws.
- We promote diversity and inclusion through our values.
- We treat each other with respect, honesty, and fairness.
- We do not tolerate discrimination nor harassment in our work environment.
- We encourage a healthy work-life balance.
- We foster flexible work models and top sharing models to accommodate the needs of our employees (home office, part-time, compressed schedules) and give them the same career development opportunities.
- We trust in the talents of our employees, and we allow them to develop their personal and professional skills.

### Remember...

- Follow and model our guiding principles in your daily work.

- Treat each other in a respectful, honest, and fair way.
- Communicate clearly and transparently and enable others to express their opinion.
- Never accept discrimination, harassment, and reprisals in your work environment.
- Empower and develop the potential in people.

### Q&A

**Q:** My co-worker Taylor constantly makes jokes about people with my skin color, and I feel that I am being discriminated against. What should I do?

**A:** We do not tolerate any form of discrimination. If you believe that you are being discriminated against by Taylor, or if you observe him engaging in this behavior against others, you should report this misbehavior in accordance with our guidelines provided in the Chapter of this Code of Conduct “How we raise concerns”. Reporting can be made to your leader or by using our reporting line.

**Q:** My friend Thor saw an interesting job offer at Edisun Power with the option to work four or five days a week. He would like to work four days a week. Does he have a fair chance to get the job with a part-time schedule and can he still pursue a career?

**A:** We hire based on qualifications for the job opportunity, and, subject to our legitimate business needs, we will consider any job applicants, regardless of whether she/he wishes to work full or part-time. We foster the development of employees regardless of their work schedule.

## How we raise concerns

**If you know of or suspect non-compliance with Edisun Power's Code of Conduct, or a violation of any law, you should report the issue. You can report your concerns internally to your supervisor, company controller, country manager, or our legal organization. Concerns can also be submitted anonymously, and we will take all reasonable measures to protect anonym complaints.**

### Expectations

- We encourage you to raise concerns if you believe in good faith that misconduct has happened.
- We value your privacy, and you can submit your concern anonymously.
- We take all reasonable measures to protect anonymous complaints.
- We do not allow or condone retaliation for reports of misconduct that are made in good faith.
- We do not tolerate reports that are made in bad faith.
- We may have to investigate ethical matters that are reported.
- We will cooperate, if required, in internal investigations of misconduct.

### Remember...

- We live our values. See something, say something.
- We do not tolerate non-compliance.
- We do not tolerate retaliation for reporting non-compliance.
- We take the reports seriously.
- We will take the appropriate actions depending on the outcome of our investigation.

### Q&A

**Q:** Robin overhears a discussion where Odin offers to a public official person (working at a municipality or governmental related entity) tickets for a football game in exchange to get a permit being signed. Should Robin report this conversation?

**A:** Yes. Those seats for a football game would be considered a bribe which can lead to imprisonment of Odin and leads to a serious loss of reputation doing proper business to Edisun Power. Robin needs to report it.

**Q:** Aladdin is a junior accountant and notices a series of questionable wire transfers made by his leader. Aladdin wants to report these transfers but is worried he will be retaliated against if he does. Should he report his concerns?

**A:** Yes. It is against our values to retaliate for the reporting of a potential violation. If you feel nervous about reporting it to the leader of your supervisor, you can report directly to our Compliance Office. You may have to participate in an investigation if one is deemed necessary, and we will take measures to keep your identity private.

### How to report

- See chapter (Your compliance contacts)



## Your compliance contacts

**We strongly encourage you and all other employees who suspect violations of the law, regulations or Edisun Power policies, international human rights and ethical standards to communicate their suspicion to the appropriate internal representatives. Stand firm, speak up if you have a concern and raise possible ethical issues in an open, fair, honest and respectful manner.**

If you have problems or questions regarding these policies and procedures or if you suspect a violation, you should contact any of the following:

- Your Supervisor
- Your Human Resources representative
- Your Country Manager
- Group Compliance Office ([codeofconduct@edisunpower.com](mailto:codeofconduct@edisunpower.com))
- The Management Board

If you raise an issue and you do not believe the issue has been properly addressed, you are obligated to bring it to the attention of another appropriate contact. Violations of the Code of Conduct or any other of the above-mentioned policies and practices may have serious consequences, ranging from financial penalty to relocation or even dismissal. The Code of Conduct is one of the main pillars of our corporate governance. We trust that you will fully commit yourselves to observing it – and we thank you for doing so.



A sunset scene over a body of water, with power lines in the foreground. The sun is low on the horizon, creating a bright orange and yellow glow that reflects on the water. The sky is a mix of blue and orange, with some clouds. The text is overlaid on the image in a large, white, sans-serif font.

**Be part of the  
innovative,  
trustworthy,  
transparent,  
collaborative &  
compliant Spirit  
of Edison  
Power!**



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