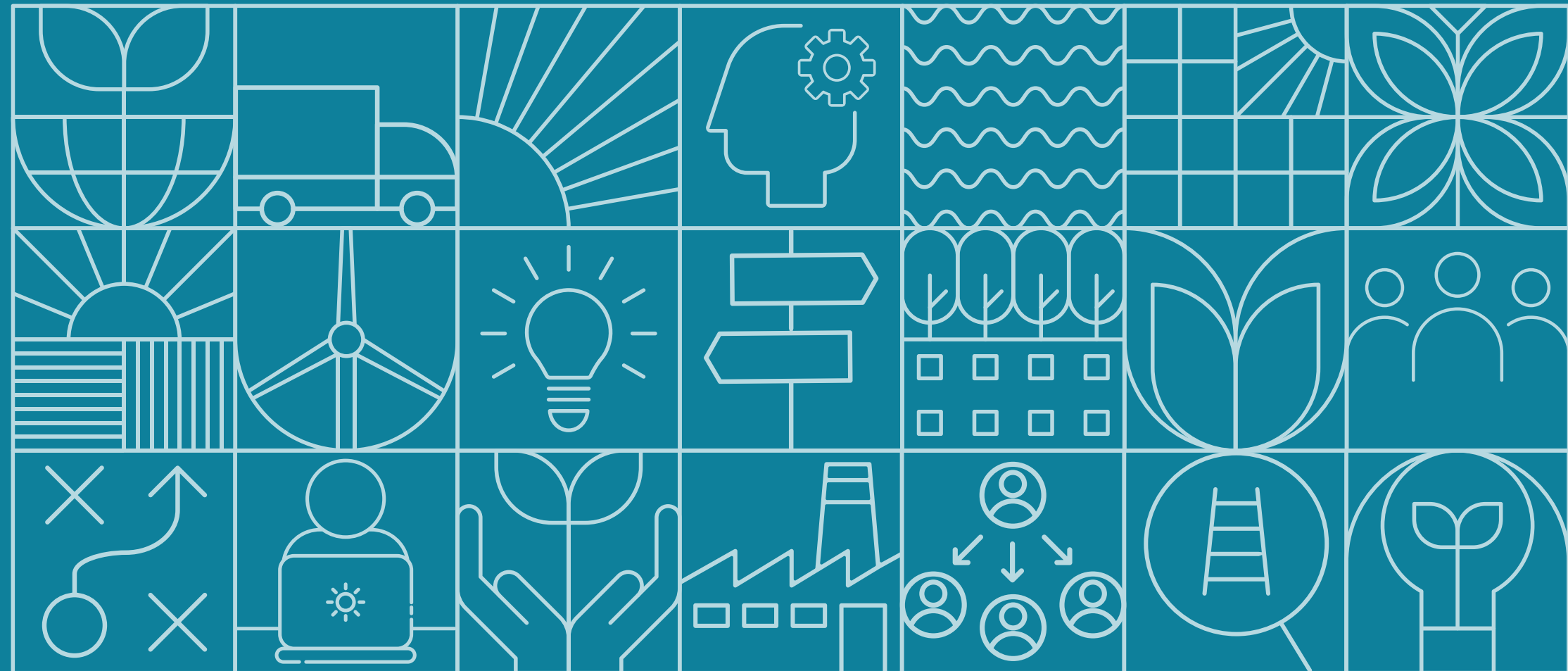


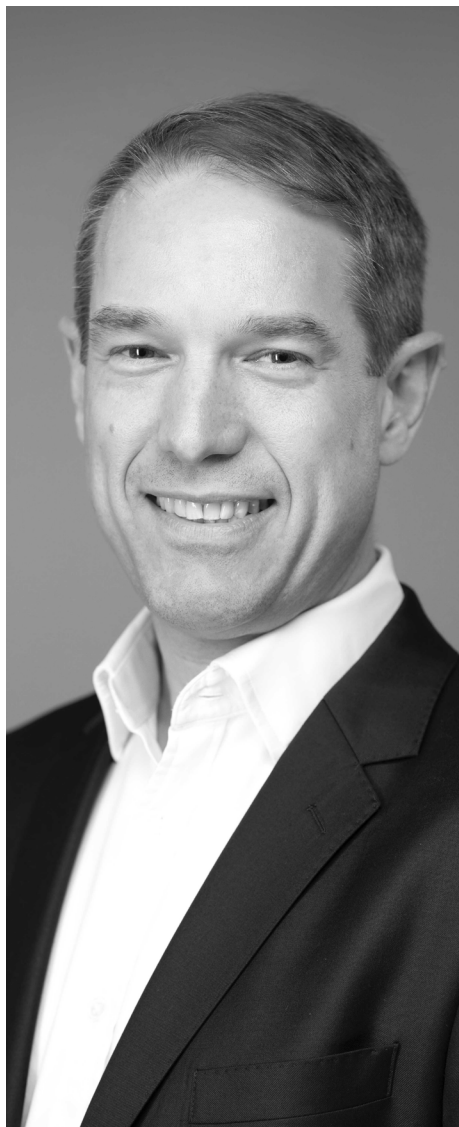
THIRD PARTY CODE OF CONDUCT & ETHICS

November 2025



sonnedix





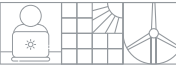
AXEL THIEMANN
Chief Executive Officer

At Sonnedix, we take great pride in the company we have become. We continue to evolve and grow sustainably, meeting the interests of all our stakeholders: staff, customers, shareholders, investors and the communities where we do business. We hold ourselves to the highest standards and build our culture based on our core values: doing the right thing, owner's mentality, curious learners, sustainable growth, and, of course, positive energy in everything we do.

This starts with our supply chain and continues through our construction, operations and offices around the planet. This is why we have developed this Third-Party Code of Conduct and Ethics ('Code') for all our business partners. Whether you are an EPC contractor, a supplier of components or services, a consultant or O&M operator, whomever you are, if you do business with Sonnedix you are considered a 'Third Party' (or collectively 'Third Parties') for the purposes of this Code. This Code also applies to your Representatives working with Sonnedix.

Furthermore, we have an independent third-party hotline ('Speak Up') in place for our staff, Third Parties and their Representatives to raise any concerns or worries. The invitation to use it is extended to you. Please use our Speak Up hotline if you think we can improve or wish to raise a concern. No issue is too big or too small, let's come together and do the right thing!

“
We require
our Third
Parties to
adhere to
this Code
and the
principles
it sets out.
”



This Code has been designed to **help our Third Parties and their Representatives understand the mandatory behaviours and standards required from them when doing business with Sonnedix.** As a minimum, we expect our Third Parties to adhere to the following requirements which govern this Code:



Third Parties: Top 5 Requirements

Comply with all applicable laws

You must comply with all applicable contractual requirements, laws and regulations including but not limited to Anti-Bribery and Anti-Corruption, Competition laws, Sanctions and Privacy laws. Doing the right thing is part of everyday life for everyone.

Health and Safety

Working safely and behaving responsibly ensuring everybody is working in a safe environment physically and psychologically.

Environmental and Social Sustainability

Considering our impact on the natural world and local communities, ensuring we are working and operating sustainably.

Human and Labour Rights

Ensuring human and labour standards are met in every jurisdiction and everyone is treated fairly at work.



Speak Up

Everyone should feel safe enough to raise any worries or concerns in the workplace.



Who must comply with this Code?

This Code is mandatory for all Third Parties and their Representatives, and we require you all to adhere to this Code. Examples of Representatives includes construction workers and operators of our projects and assets, engineering or design contractors, sub-contractors, suppliers, and consultants.

Sonnedix reserves the right to carry out any required audits to ensure all its Third Parties are complying with this Code.

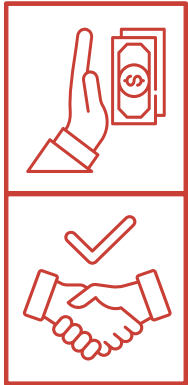




Compliance with laws and regulations

All Third Parties and their Representatives shall operate in compliance with all applicable laws and regulations from time to time in force, including laws and regulations relating to issues addressed in this Code. If there is a conflict between any applicable laws or regulations, the provisions of an agreement with Sonnedix and/or the provisions of this Code, the Third Party is required to meet the most stringent standard.





Bribery, corruption, fraud and conflict of interest

All Third Parties and their Representatives shall comply with all applicable laws, statutes, codes and regulations relating to bribery, corruption and fraud.

All Third Parties shall not:

- accept, offer, promise, pay, permit or authorise bribes, facilitation payments, kickbacks or illegal political contributions;
- accept, offer, promise, pay, permit or authorise money, goods, services, entertainment, employment, contracts or other things of value, in order to obtain or retain improper advantage; or
- accept, offer, promise, pay, permit or authorise any other unlawful or improper payments or benefits;
- engage in any activity, practice or conduct that would constitute fraud or a fraudulent offence ensuring they maintain accurate financial and business records;
- evade or facilitate the evasion of tax by another person anywhere in the world or take part in any money laundering, terrorist financing, theft or fraud or trade sanction violations and shall comply with any export or import controls;
- provide or accept gifts or hospitality of a lavish or excessive nature and or give or receive any gifts or hospitality during any contract, bidding or tendering process. Such behaviour is strictly prohibited;
- put themselves in a position where there could be an actual or perceived conflict of interest. If you become aware of a situation where you feel there could be a potential conflict of interest due to your activities or the nature of your relationships, you must inform Sonnedix immediately either using your usual local contact or our Speak Up hotline;
- accept, offer, promise, pay, permit or authorise any bribe, kickback or facilitation payment to a public official.



Anti-Competitive behaviour

Third Parties and their Representatives shall comply with all applicable competition laws including, without limitation, those relating to information sharing with competitors, price fixing and rigging bids.



Data protection and information security

Third Parties shall comply with data protection laws and requirements when processing any personal data on Sonnedix's behalf.

Third Parties shall have in place appropriate measures to:

- protect the integrity and confidentiality of information (including information belonging to or supplied by Sonnedix) held on its systems (which include physical and online or electronic systems); and
- ensure that there is no unauthorised access of the information by third parties, including its Representatives.



Health, Safety & Environment

The health, safety, and wellbeing of everyone working with Sonnedix is absolutely non-negotiable and forms the foundation of everything we do.

We work in complex, high-hazard environments where risks must be actively identified, eliminated where possible, and controlled as far as reasonably practicable. Our Third Parties and their Representatives, must take ownership of creating conditions where work can be performed effectively, without harm, and to the highest standard.

Every person from our construction sites to our supply chains are empowered and expected to Speak Up, challenge unsafe conditions, and stop work if necessary. We do not accept anybody working under the influence of drugs or alcohol where their work can be impaired or where this would put the safety of any individual at risk. We require our Third Parties and their Representatives to demonstrate proactive risk management, ensuring everyone returns home safe, healthy, and well every single day.





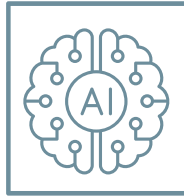


Environmental and Social Sustainability

In line with Sonnedix's ambition to operate in a way which supports the natural world and our local communities, all Third Parties shall ensure that their business activities, at a minimum comply with all applicable environmental laws and they have an environmental policy in place.

We also require Third Parties to have adequate environmental management systems in place and require them to account for Greenhouse Gas (GHG) emissions as required. Our Third Parties and their Representatives must behave like a trusted neighbour by respecting local cultures and the rights of indigenous peoples, and ensure community safety in relation to Sonnedix projects or operations.





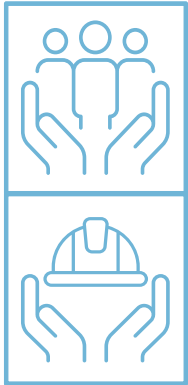
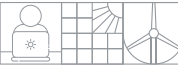
Artificial Intelligence (AI)

All Third Parties shall give Sonnedix as much advance notice as possible if they propose to use an Artificial Intelligence (AI) system to provide goods or services. This applies to the Third Party's use of AI systems to directly provide goods or services, and not the use of AI systems as part of the Third Party's internal management.

All Third Parties shall implement and adhere to the highest standards of responsible and ethical practices when designing, implementing, monitoring, training, testing, deploying, or otherwise developing or using AI systems. This includes adhering to all applicable laws and regulations.

All Third Parties must not use or retain Sonnedix's data or confidential information for the purposes of training or inputting into any AI system or model without prior written approval from Sonnedix.



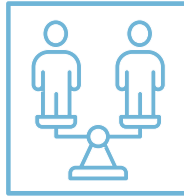


Human and Labour Rights

The Third Party and its Representatives shall respect human and labour rights and comply with all nationally and internationally recognised applicable laws and standards relating to human rights including the International Labour Organisation (ILO) Conventions and the International Bill of Human Rights.

All Third Parties shall:

- have a policy commitment to respect Human and Labour Rights which is communicated to, and applied across, all appropriate parties, including its Representatives;
- conduct due diligence to obtain assurances within their supply chain that the products or services they are using or procuring have not been sourced from companies with a history of compromising or negating the human rights of their workers, including forced or child labour;
- provide reasonable working hours and fair wages;
- not prevent employees from associating freely;
- adhere to collective bargaining agreements where they exist and allow employees the freedom to elect to join such practices;
- not employ persons under the age of 18, and make reasonable enquiries and obtain assurances that the products they are using have not involved any person under the age of 18, in any manner that is economically exploitative, likely to be hazardous to or interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development;
- not employ any form of forced labour, which consists of any work or service not voluntarily performed that is provided from an individual under threat of force or penalty. This covers any kind of involuntary or compulsory labour such as indentured labour, bonded labour, prison labour or similar labour-contracting arrangements;
- not provide products which are considered at risk of containing or being conflict minerals, ensure that these materials do not directly or indirectly finance armed conflict or human rights abuses, and conduct due diligence on their origin and supply chain in line with internationally recognised standards.



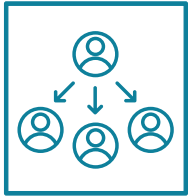
Diversity, Equity & Inclusion

Third Parties shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement or any employment practice based on race, caste, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy status, disability, union membership or political affiliation or any other characteristic other than a Worker's ability to perform the job subject to any accommodations required or permitted by law.

Sonnedix does not tolerate any form of harassment in the workplace, including sexual harassment. The Third Party must take appropriate measures to prevent any form of harassment, from occurring in a Sonnedix workplace or any workplace related to or part of the service provided to Sonnedix and provide evidence of any such measures to Sonnedix on request.

The Third Party must compensate all workers with wages, including overtime premiums, and benefits that at a minimum meet required local law standards.





Third Parties & Representatives

When assessing the Third Party's performance against the requirements set out in this Code, Sonnedix shall have due regard to the risk profile of the transaction, the Third Party's ability to comply with the requirements and the consequences where the Third Party fails to meet those requirements.

The Third Party shall carry out appropriate due diligence on prospective Representatives that will form part of Sonnedix's supply chain or work on Sonnedix project sites. Due diligence must include the following as a minimum:

- investigations into prospective Representatives' stance, public statements, compliance with applicable laws and other actions on human rights, treatment of workers, bribery, ethical behaviour and the environment;
- risk assessments for countries from which materials, components or finished goods are sourced; and
- the prospective Representative's ability to meet the requirements and principles that are covered in this Code.

In its dealings with Representatives, the Third Party shall:

- ensure that agreements with Representatives include provisions that require the Representatives to comply with applicable provisions of this Code, having due regard to the risk profile of the transaction, the Representative's ability to comply with those provisions and the consequences where the Representative fails to meet those requirements;
- ensure that it has measures to monitor that those Representatives are complying with those compliance-related provisions and that it has systems in place to address any deficiencies or breaches of those requirements; and remunerate its Representatives promptly.



Crisis Management and Cyber Security

We require our Third Parties and their Representatives to have robust business continuity and crisis management plans in place. This includes annual reviews of such plans where they are tried and tested.

Additionally, the plans should cover and include robust cyber security controls and have measures in place to reduce vulnerability to threats and cyber-attacks which could impact Sonnedix. Should you be subjected to a cyber-attack, you are obliged to inform Sonnedix as soon as practically possible.



Certifying compliance and audit

The Third Party shall provide written confirmation to Sonnedix at least once per year that it understands and complies with this Code.

The Third Party shall provide any additional third-party or self-certifications that are reasonably required to demonstrate compliance with all applicable laws and frameworks within 30 days of a written request from Sonnedix.

Sonnedix may conduct audits and inspections to verify a Third Party's compliance with this Code. Sonnedix is not under any obligation to conduct such audits or inspections.



Self-monitoring and reporting breaches

All Third Parties shall monitor their compliance with the Code and shall report any breaches (actual or suspected) of this Code as soon as possible either by contacting a member of Sonnedix staff or by using the Speak Up hotline.

All Third Party shall not retaliate or take disciplinary action against any member of staff that has, in good faith, reported breaches of this Code or questionable behaviour, or who has sought advice regarding this Code.



Breach, remediation and termination

Where Sonnedix has become aware of a breach of this Code by a Third Party or its Representatives, Sonnedix may either immediately terminate its business relationship with the Third Party (including any contracts); or require the Third Party to produce a remediation plan specifying action that the Third Party needs to take to comply with the Code and present it to Sonnedix promptly.



Updating this Code

Sonnedix reserves the right to modify this Code from time to time.





Do the Right Thing Speak Up!

Everyone should feel comfortable Speaking Up if they see something that violates our Third Party Code. You can use any of the following methods to raise a concern:



Web portal: MyComplianceReport.com
Compliance and Ethics Reporting



Telephone numbers:

Chile

800 914 102

France

0 805 98 04 57

Germany

0800 1810122

Italy

800 581 461

Japan

034 560 1087

Poland

800 005 272

Portugal

800 181 414

Spain

900 751 110

US

888 893 9062

UK

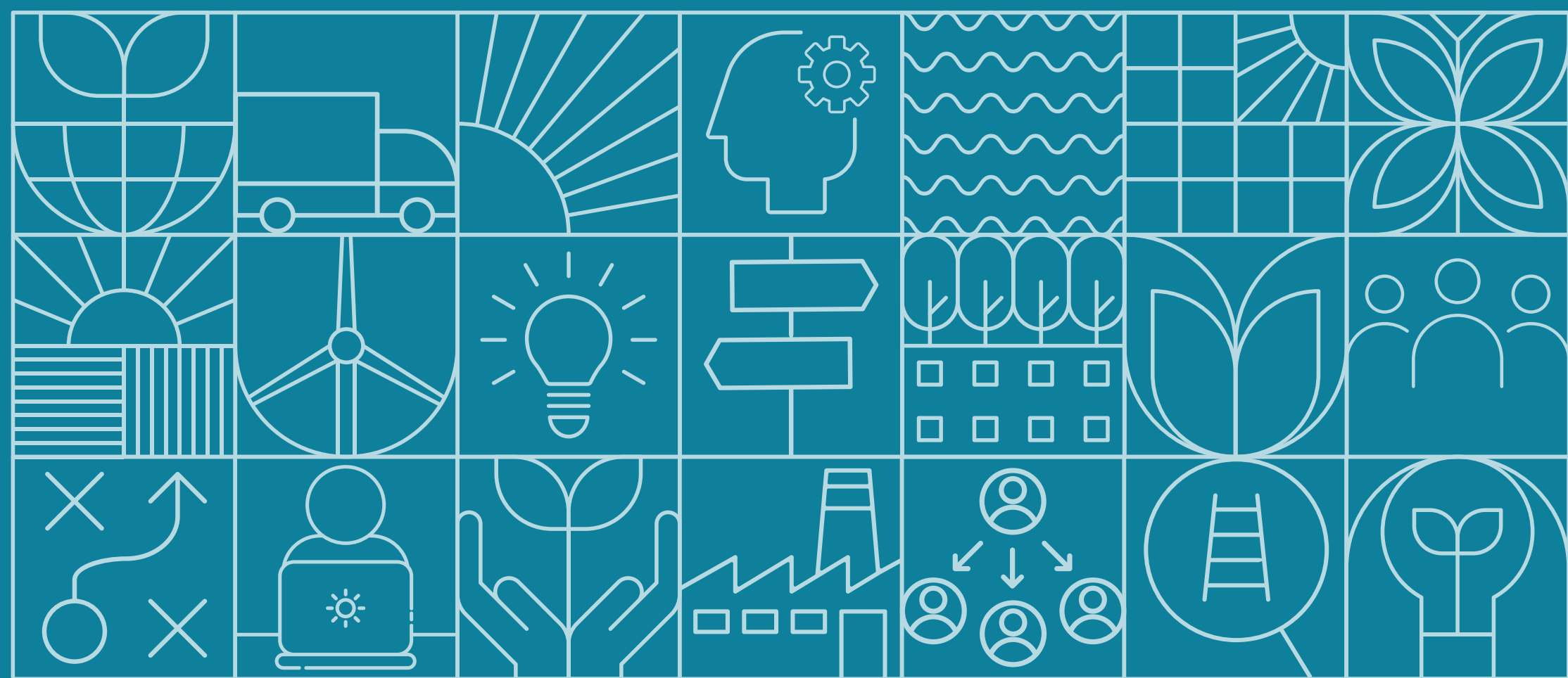
0800 102 6946

We require all our Third Parties and their Representatives to either contact a member of Sonnedix staff or use the Speak Up hotline or web portal to raise any concerns or worries they may have whilst working with Sonnedix.

Concerns may relate to unethical or unsafe behaviour you have seen in one of our offices or on one of our construction sites.

If something doesn't feel right, all our Third Parties and Representatives should use Speak Up to report their concern.

We also require our Third Parties and Representatives to have a non-retaliation policy in place which protects those raising genuine concerns in the workplace.



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