

Policy – Code of Conduct

Venergi is committed to acting responsibly towards people and the environment, and we seek to promote and provide services and solutions that contribute to sustainable development.

Application

Venergi asks that all employees respect and proactively adhere to our Code and to internationally recognised principles on human rights, the environment and anti-corruption as we only do clean business. If you identify matters or information concerning our services, solutions, own operations and business relations that are unacceptable given our Code, each of us has an obligation to act.

Working responsibly is part of being a Venergi employee, as is our ambition to become a leading sustainable energy consultant in Austria.

PEOPLE

In Venergi we respect and support internationally proclaimed human rights¹ as stated in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.²

Through our activities we work to avoid causing or contributing to adverse human rights impacts either directly or indirectly and address such impacts if they occur. In addition, Venergi enables opportunities by contributing positively to the respect and support for human rights with our services, solutions and own operations.

PEOPLE - How should you act?

You are expected to be aware of our Code which entails respect and support for human rights. You must contribute to our respect and support for human rights principles through your own behaviour.

You are expected to act if you identify potential or actual adverse human rights impacts. This includes adverse impacts on employees, customers, local communities or other potentially affected stakeholders.

Please inform your immediate Manager or Director if ever you identify potential or actual adverse impacts on human rights. This includes all human rights matters that impact any of Venergi employees. Where potential impacts are obvious or can easily be prevented, you may use your own judgment and take immediate action and inform your immediate Manager.

ENVIRONMENT

In Venergi we respect and support internationally recognised environmental principles as stated in the Rio Declaration on Environment and Development. We work to avoid causing and contributing to adverse impacts through our activities and address such impacts if they occur. In addition, Venergi enables business opportunities, by contributing positively to the respect and support for environmental principles with our services, solutions and own operations.

ENVIRONMENT- How should you act?

You are expected to be aware of our commitment to the environment which entails respect and support for internationally recognised environmental principles.

You must contribute to our respect and support for environmental principles through your own behaviour.

Venergi's approach

In Venergi we operationalize respect for the principles by implementing processes in line with the UN Guiding Principles on Business and Human Rights and the FIDIC³ Integrity Management Guidelines.

The processes for responsible business behaviour will guide you on what you need to be aware of in assisting Venergi to comply with our commitment to internationally recognised principles on human rights, the environment and anti-corruption.

CROSS-REFERENCES TO OTHER POLICIES AND PROCEDURES:

Policy – Conduct Principles

Policy – Environmental Management

Policy – Health and Safety Management

Policy – Anti-Corruption

Policy and Procedure for Speak Up

¹ Including labour rights

² Refer to appendix on Conduct Principles on human rights, environment, integrity and approach that Venergi is committed toward.

³ International Federation of Consulting Engineers

Integrity

In Venergi we respect the rules of anti-corruption laws e.g. the UK 2010 Bribery Act and we respect and support internationally recognised anti-corruption principles as stated in the United Nations Convention against Corruption and the FIDIC Integrity Management Guidelines.

We avoid causing and contributing to corrupt practices through our activities and address such incidents if they occur. In addition, Venergi enables business opportunities, by contributing positively to the respect and support for anti-corruption principles with our services, solutions and own operations.

Integrity - How should you act?

You are expected to comply with our commitment to Integrity. This entails compliance with the law and respect and support for internationally recognised anti-corruption principles and standards.

You must comply with our commitment through your own behaviour and not participate in or support any form of bribery, corruption or fraudulent practices.

Business integrity risks are inherent when operating in an ever-changing international business environment. Business integrity risks and dilemmas can therefore not be avoided – they must be handled appropriately. Only when we know where things can go wrong, can we improve.

You are obligated to act if you observe or suspect misconduct by submitting a report through our Speak Up mechanisms.

Speak Up and Reporting

An important tool to uphold Venergi's commitment to acting responsibly is the Speak Up reporting to Ramboll's Speak-Up System or Wien Energie's Hinweisgeber-Plattform. If you observe or suspect breach of laws, policies, and/or obligations (e.g. compliance requirements in client contracts) you should report the compliance concerns through Ramboll's Speak-Up System ([click here](#)) or (depending on the sphere, in which the compliance concerns would thematically be better located in the opinion of the reporting person) Wien Energie's Hinweisgeber-Plattform ([Home - BKMS System \(bkms-system.net\)](#)).

How should you act?

You are expected to be aware of our commitment to responsibility, which entails the implementation of processes that are in line with international principles and guidelines. You are expected to assist Venergi in implementing the processes by:

- Reporting identified potential or actual adverse impacts on human rights, the environment and anti-corruption that Venergi caused or contributed to as well as adverse impacts that may be directly linked to our services and solutions by our business relations.
- Participating in making use of Venergi's leverage to influence the business relation in question to address the potential or actual adverse impact.

Legal Compliance

In addition to meeting the requirements of the Code, every employee shall assist in ensuring that Venergi complies with national regulations wherever we operate. Where differences between the terms of the Code and national regulations occur, Venergi employees shall seek the best way to honour the Code while adhering to the law. When an employee experiences conflict between provisions of the Code and national regulations they must alert one of the Managing Directors where the most appropriate course of action will be agreed ensuring respect for the international principles outlined above.

When conducting a business relationship with WIEN ENERGIE GmbH or its affiliates, the regulations under the Framework Contract (concluded between WIEN ENERGIE GmbH and Venergi), in particular its sections VII.3 and XI.5, shall prevail over this Code of Conduct.

OWNED BY	The board
CHECKED BY	AMAJ
APPROVED BY	The board
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