

Policy on business conduct in the EVN Group

The EVN Group is an international energy and environmental services provider. We are aware of the impacts of our business activities on the environment and society and place high value on ethical and legally responsible behaviour by all our employees, business partners and suppliers. In that way, we want to contribute to a better future.

1 Purpose

This policy is intended to serve as a guideline for our efforts to identify, assess and manage the material impacts, risks and opportunities of our business activities. It defines the principles and processes that form the basis to monitor, control and mitigate actual or potential impacts and risks.

This policy underscores our commitment to the sustainable orientation of our business activities. It also reflects our efforts to make a positive contribution to the Sustainable Development Goals (SDGs) of the United Nations (UN), which we have supported for many years.

2 Scope of application

This policy covers our principles and guidelines for responsible and honest actions and is applicable throughout the group in Austria and other countries. Our EVN Values, the EVN Code of Conduct, the Code of Conduct for Suppliers (EVN Integrity Clause), our Human Rights Policy and our Sustainability Guideline supplement, underscore and ensure the targeted communication of these principles. We also expect our business partners, suppliers and customers to respect and support our requirements and efforts to prevent or mitigate negative or undesirable impacts on the environment and society. We cooperate, wherever possible, to meet our sustainability goals.

These principles of conduct and action lines concentrate on the focus topics identified during the annual update of the materiality analysis.

3 Principles of conduct and priority action lines

We follow the guidelines and recommendations contained in the frameworks of national and international organisations. These frameworks include, in particular, the following: the UN Global Compact, the Universal Declaration of Human Rights adopted by the United Nations and the European Convention for the Protection of Human Rights and Fundamental Freedoms, the Tripartite Declaration of Principles issued by the International Labour Organisation (ILO) concerning Multinational Enterprises and Social Policy, the ILO Declaration of Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and the Austrian Code of Corporate Governance.

The attainment of our corporate policy goals is based on the following principles of conduct and action lines:

- **Compliance:** We are committed to compliance with all relevant regulations and standards. Our goal is to not only fulfil but – wherever possible – to exceed these requirements. Compliance violations of any type must be avoided. They damage the companies in the EVN Group as well as each and every employee. In order to ensure integrity and compliant behaviour, we have installed a group-wide compliance management system based on three pillars: prevention through awareness creation and training, the identification of violations, and reaction through explanation and improvement.
- **Competence development:** Each employee is responsible for minimising the negative impacts of non-compliance connected with his or her activities. We conduct regular mandatory training programmes and supplementary awareness activities to create a greater understanding among our employees for our principles and guidelines and to give them security in their daily operating activities. Our business partners and their employees are also informed of our values and behavioural standards in training courses and workshops.
- **Integrity and prevention of corruption:** We decisively oppose all forms of corruption and apply a very broad definition of this term: In addition to illegal payments (e.g. bribery, kick-back payments, fictitious services), we see corruption as also including all types of benefits (e.g. gifts, invitations, privileges not provided at arm's length, immaterial advantages like awards or protection). The

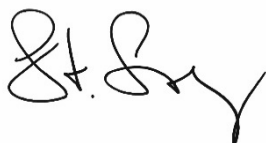
acceptance and granting of these types of benefits is prohibited for all EVN employees and their relatives throughout the entire group. The only exceptions represent the acceptance or granting of small, low-value local or national tokens. Apart from our restrictive internal catalogue of rules and values, all EVN employees and corporate bodies are subject to the strict Austrian laws for public officials. Compliance and security in these areas are supported by a focus on integrity and the prevention of corruption in all our compliance training formats.

- Transparency: We place great value on transparency towards all our stakeholders in the conduct of our business activities. Our corporate principles are therefore accessible both internally and externally. Moreover, we are convinced that information from stakeholders can make an important contribution to improving the corporate culture and compliance with our policies and norms. This is reflected in the creation of various possibilities to report complaints or information of non-compliant behaviour. A group-wide, uniform complaint management system and whistle-blower procedure guarantee the standardised follow-up of complaints and reports to prevent or terminate irregularities or incorrect behaviour. We are aware of our responsibility for the protection of whistle-blowers and guarantee maximum confidentiality and anonymity.
- Sustainable procurement and supplier management: We are aware of the impacts of our procurement procedures on the environment and society and are committed to the protection of natural resources and workers in the value chain. Sustainability criteria are therefore included in the selection process for our suppliers who we support, if necessary, in improving their sustainability performance. Sustainable procurement in the EVN Group is based on our strategic supplier management and supplemented by the analysis and monitoring of the value chain as well as an audit system. We follow a risk-based approach to meet our goals.

4 Responsibility

The Executive Board of the EVN Group represents the highest level of the company's organisation that is responsible for the implementation of this policy.

The Executive Board of EVN AG



Stefan Szyszkowitz
Sprecher des Vorstands



Alexandra Wittmann
Mitglied des Vorstands



Stefan Stallinger
Mitglied des Vorstands