

Blueleaf Energy Code of Conduct

Application and Scope

This Code of conduct (Code) applies to all employees, contractors and consultants (staff) of Blue Leaf Energy Asia Pte Ltd and its related entities (Blueleaf Energy) and also applies to voting directors of Blueleaf Energy.

The Code sets out the way staff are expected to do business. The Code is not an exhaustive list of policies and procedures. Staff will also be required to understand and comply with policies and procedures which reflect the specific requirements of a particular business or region.

Failure to act in line with our Code may have serious consequences for Blueleaf Energy as well as for the individuals involved. Where a breach of the Code also infringes local or international laws, the matter can be referred to the police or relevant law enforcement authority. Violations can result in disciplinary actions (including dismissal) and may also lead to fines and imprisonment for the individuals concerned as well as our directors, who remain legally responsible for their respective entities.

In this publication, the words “we”, “us” and “our” are also used to refer to Blueleaf Energy and its related entities in general or those who work for them.

What we stand for

Our Operating Principles

Blueleaf Energy’s operating principles guide us in our daily business interactions and our Code is structured around each of our principles. As you read our Code, think about how your actions reflect these values.

- At Blueleaf Energy, we must always act in **line** with our five operating principles:
- We are a **SAFE & SUSTAINABLE** company
We accept our responsibility towards environmental, social and economic sustainability. We are driven to support a safe and healthy working environment, helping our people, our planet and our business thrive for long-term prosperity.
- We are **COMMITTED** to Excellence
We are committed to excellence in all that we do, as we continually listen, learn and innovate to create greater value for our people, customers, partners and shareholders.
- We act with **INTEGRITY**
We believe in strong values, morals and principals and follow them consistently. Across markets, we adhere to the same code of conduct and apply the highest ethical standards towards all key stakeholders and the local communities we work in.
- We are one **TEAM**
We work together as one team across countries, diverse cultures and business units. To foster trust and mutual respect in our conduct, we create an open and transparent work environment for our colleagues to express opinions and ideas and hear what others have to say.
- We are **ENTREPRENEURIAL**

We are hands-on, dynamic, result-oriented team taking calculated risks to stay competitive and build long term value

At Blueleaf Energy, we rely on our strengths and passion to deliver innovative, sustainable, and efficient renewable energy solutions. Our individual strengths contribute to the achievement of our goals and development. We manage and cultivate our employees' unique skills and experiences so that we can offer excellent, reliable services to our clients, stakeholders and each other.

Our People

- We work as a team to bring our knowledge, expertise and passion for solar energy to our clients.
- We are proud to be part of Blueleaf Energy and are dedicated to our business.
- We are flexible and adaptable and have a 'can do' attitude, while acting with integrity.

Our Management

- We lead by example and are committed to providing an engaging and inspiring work environment.
- We empower our employees. We provide encouragement and coaching for the career development of all Blueleaf Energy employees.

Our Organisation

- We are committed to our clients and stakeholders.
- We strive for excellent quality with the delivery of our professional services.
- We create a respectful culture where we can collaborate, create and innovate

Speak Up

Raising a concern or reporting a suspected violation of our Code takes courage and resilience. You may feel pressure to keep quiet or not cause a problem. However, we, as a company, admire those that speak up when they think something is not right. In fact, not reporting misconduct could itself be a violation of our Code.

Making honest reports of suspected misconduct enables Blueleaf Energy to uphold our values and better serve our stakeholders. If you become aware of a situation that may violate our Code, you have a duty to report it to:

- Your direct manager or supervisor;
- The General Counsel; or
- The CEO

All reports will be kept confidential in line with Blueleaf Energy's policies and procedures. Reports can also be made anonymously, in accordance with local laws.

Anyone that reports a suspected violation of our Code or voices their concerns in good faith will be protected against acts of retaliation. Retaliation can take various forms but may include harassment, bullying, demotion, being assigned undesirable tasks or other negative actions. A good faith report is one where the reporter believes it to be true and it is not made maliciously or with the purpose of causing someone undue hardship.

A report does not necessarily need to be substantiated for it to be made in good faith, but the reporter should believe it to be a genuine concern of misconduct.

The **Breach, Incident and Escalation policy** sets out the roles, responsibilities and reporting requirements formatters such as suspected or actual breaches of:

- Internal policies and procedures;
- External rules and regulations; or
- Any adverse operational incidents.

Blueleaf Energy is committed to providing an environment where no employee is subjected to retaliation or victimisation for reporting or escalating genuine concerns of suspected misconduct. Our **Whistleblower policy** will set out the procedure to report such violations.

What our policies require of you

The following is a brief overview but not an exhaustive list of Blueleaf Energy's key policies which apply to and which set out our behavioural expectations of all employees, contractors and consultants (staff) of Blue Leaf Energy Asia Pte Ltd and its related entities (Blueleaf Energy) and also applies to voting directors of Blueleaf Energy.

Personal and Professional Conduct

Professional Behavior

You are expected to conduct yourself in a professional manner whether in person, online, or with any other form of communication. This includes acting with courtesy and respect. Your actions, even outside of work, should reflect positively on yourself as well as Blueleaf Energy's reputation.

Blueleaf Energy is committed to a safe and injury-free workplace that values equal opportunity, is free from discrimination, harassment and victimisation and does not tolerate inappropriate workplace behaviour. You must comply with work, health and safety standards, take care to protect your own health and safety and consider the health and safety of others. Blueleaf Energy's Appropriate Workplace Behaviour and Workplace Health and Safety staff work together and act in a way that is consistent with What We Stand For and how we do business.

Part of creating a safe working environment means being free from the effects of drugs and alcohol at work. Alcohol in small quantities may be consumed only on special occasions with proper pre-authorisation and must be consumed in a responsible manner. Employees are prohibited from using alcohol, illegal or improper drugs while working because you are more likely to make an unwise decision while under the influence of drugs or alcohol. Our **Fitness to Work policy** will contain the full framework.

Conflict Management

You must disclose any personal or business activities or interests which may give rise to a conflict of interest to the CEO for consideration. Conflicts of interest can occur between our businesses, clients or your own personal investment or business activities outside Blueleaf Energy. Examples include a situation where the interests of one client or potential client may be in competition with those of another client or where you have a personal interest which may conflict with a client's interest, or that of Blueleaf Energy.

Blueleaf Energy has in place a variety of measures to manage conflicts of interest in our **Conflicts of Interest policy**. If you become aware of a possible conflict of interest you must escalate this to your manager.

Fraud and Accuracy of Records

You are expected to act with honesty and integrity and must report any instance of suspected fraud immediately to Legal. All instances of actual, suspected or alleged fraud will be dealt with seriously and investigated appropriately.

Our ability to make smart and rewarding decisions is based on timely, accurate and useful information. All the information that we communicate about Blueleaf Energy must be accurate and truthful. This includes information that we provide to government regulators, investors, our management and each other. Whenever we make a statement about our finances in annual reports, balance sheets, expense reports, tender proposals or other documents, we must ensure that it is accurate. Our **Travel and Expenses policy** will contain more information on acceptable expenses

Dealing with External Parties

Communications

All communications you conduct with any external parties including our clients and other counterparties must be consistent with Blueleaf Energy's standards of communications with the public. The tone and content of any communication should be professional and adhere to the following standards:

- fair, accurate, and in good taste
- no initiation of or referral to information that is unsubstantiated or knowingly false
- balanced, equally presenting both the potential opportunities or advantages and risks
- not include guarantees, exaggerations, nor unwarranted, confusing, ambiguous or unreasonable claims
- not include omissions of material facts, which can be just as misleading as exaggerations or inaccuracies, and
- not disclose confidential information.

Communications (including emails and associated attachments) which contain confidential information or which are marked 'Internal only, not for external distribution' are strictly for internal use only and should not be copied or disseminated without prior authorisation.

Communications should also respect our **Endorsement policy** which applies to both corporate entities as well as non-profits.

Environmental and Social Risk

Blueleaf Energy recognises that environmental and social risks can impact our businesses and affect the communities in which we operate. Blueleaf Energy is committed to ensuring these risks are identified and managed responsibly. You are expected to identify, assess and manage material environmental and social risks in all business activities and comply with applicable laws, regulations and policy. Refer to the **Environmental policy** for guidance.

Gifts and Entertainment

If, in the course of your work for Blueleaf Energy, you give or accept a gift or entertainment, you must ensure that it is appropriate, that it does not give rise to any perceived or actual conflict of interest between Blueleaf Energy, its staff, clients or other third parties and is properly authorised and recorded. The giving or receiving of gifts or entertainment is subject to restrictions, approval and record keeping requirements. Refer to the **Gifts and Entertainment policy** for further details.

Anti-Bribery and Corruption

You must not give, offer, promise, accept, request or authorise a bribe whether directly or indirectly, on behalf of, or for the benefit of, Blueleaf Energy. A bribe may be in the form of cash, gifts, entertainment or other benefits. The actual or attempted use of any form of bribery or corruption either directly or indirectly on Blueleaf Energy's behalf to advance our business interests or those of our associates is strictly prohibited.

The **Anti-bribery and Corruption policy** specifically prohibits facilitating payments, even where these payments are legal in the country in which they would be paid.

Privacy and Data Protection

You must take reasonable steps to keep Personally Identifiable Information (PII) of individuals with whom we deal secure and protected from misuse, loss or unauthorised access, modification or disclosure. PII is information or opinion about an individual whose identity is apparent or can be reasonably ascertained from that information or opinion. Blueleaf Energy collects only the PII needed to perform its functions and activities and only uses or discloses information for the purpose for which it was collected with the individual's consent or as permitted by law or regulation. If you become aware of a privacy breach, contact Legal immediately. Please refer to the **Employee Personal Data Protection policy** for more information.

Anti-Money Laundering and Counterterrorism Financing

Blueleaf Energy is committed to the fight against money laundering and terrorist financing and has established policies that set out governing principles and standards to protect Blueleaf Energy and its businesses from being used as a conduit for such activities. If you notice anything suspicious or unusual in your work that could indicate money laundering or terrorism financing activities by our clients you must escalate this to the Legal team for further investigation. Please refer to the **Anti-Money Laundering and Counter-terrorism Financing** policy for more information.

Expectations of Third Parties

We rely on many different types of third parties to be successful in what we do. Such third parties may include suppliers, agents, contractors and other providers of goods or services. We have worked hard to establish positive relationships with these parties and we depend on them to act ethically and in accordance with all applicable laws. Blueleaf Energy may be held responsible for the actions of third parties acting on our behalf so it is important that we select the right partners.

We should all know our basic expectations for third parties:

- **Workplace Health, Safety and Environment** – Adhere to country-specific laws, rules and guidelines to prevent accidents and maintain employee health and safety.
- **Anti-bribery and corruption** – Never directly or indirectly offer or accept a payment or anything of value to another entity or government official to obtain or retain an improper business advantage.
- **Respect of Blueleaf Energy's intellectual property and confidential information** – Protect the confidentiality of Blueleaf Energy's information and do not share it without proper authorisation.
- **Conflicts of interest** – Avoid all potential and actual conflicts of interest and disclose any possible issues as soon as possible.
- **Human rights** – Follow all laws for fair working conditions, wages, hours and child labour practices. Safe and respectful working conditions must be practiced.
- **Discrimination** – Prohibit all types of harassment including bullying and sexual harassment. Promote diversity.
- **Product and service quality** – Products and services should meet all quality standards. All information provided to Blueleaf Energy must be truthful and accurate.

Using Blueleaf Energy Assets

Blueleaf Energy provides access to equipment, systems and services to enable you to carry out your role and only for authorised and legitimate business purposes. Any information that you create, send, receive, download or store on our electronic or telephonic equipment and systems remains Blueleaf Energy property.

Blueleaf Energy may monitor, review and disclose information as deemed appropriate, subject to applicable laws and regulations. There is no implied right to privacy when using Blueleaf Energy technology.

When using technology related to social media and electronic communications, you are responsible for exercising sound judgement so as not to expose Blueleaf Energy and its businesses to unacceptable risks.

For further information, refer to the [Acceptable use of technology policy](#).

Appendix for managers and supervisors

Our leaders and managers have special responsibilities and should set an example for those that they supervise. They create the tone for our strong values and ethical leadership which has a significant impact on the way in which our employees perform their roles.

We count on our leaders to embody our Code and to set an example through their actions. Our leaders are key to creating a positive culture of ethics and integrity for all our employees. If you are a manager, know that your team is looking to you to lead and that your actions set the tone for others.

Our managers are expected to be available to their teams to help them understand our Code and the right course of action. We want all employees to feel free to discuss any questions or dilemmas they may have with their manager. Questions raised about our Code and any reports of misconduct will be taken seriously.

Our managers are responsible for responding to questions and concerns about how to act ethically, as well as reports of possible Code violations. Managers do not have to know the right action in every situation, but they should know when and how to seek further advice.