

TECHNICA NOVA BALTICA

People who create energy.

CODE OF ETHICS

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1. Introduction

At Technica Nova Baltica, we believe that transparent rules, honest intentions and responsibility for the impact we have on people, the environment and the business environment are the foundation of any long-term cooperation. Our mission is to support the energy transition through projects in the renewable energy sector, while respecting the highest ethical standards.

The Code of Ethics defines what guides us on a daily basis, both in internal relations and with external partners. It is a set of common principles for all persons cooperating with TNB – regardless of the form of cooperation, role or place of operation. We believe that ethics is the foundation of trust towards our employees, customers, suppliers, communities and other stakeholders.

2. Scope of application and commitment

This Code of Ethics applies to all persons cooperating with Technica Nova Baltica, regardless of the form of cooperation (including employment, B2B contracts, civil law contracts and project-based collaboration), as well as to representatives acting on behalf of TNB.

The Code applies in all work-related contexts, including remote and on-site work, business travel, meetings, industry events and all forms of communication (including email, messaging apps and social media when representing TNB).

We expect our business partners and subcontractors to respect ethical standards consistent with this Code. Supplier and subcontractor expectations are further described in the Code of Cooperation with Suppliers.

3. Our Core Values

Integrity and transparency – we act fairly, justly and ethically in every situation. Our decisions are based on facts, respect for others and transparent communication.

Respect and equality – we value diversity, support an inclusive working environment and believe in the dignity of every person, regardless of their background, identity or role in the project.

Professionalism – we maintain high standards of competence, commitment and cooperation. We treat every task responsibly, with attention to quality and timeliness.

Sustainable development – our actions take into account the impact on the environment, society and future generations. We seek solutions that bring long-term benefits.

Responsibility – we are aware of the impact we have on people, the environment and the business environment. We take responsibility for the decisions we make and the relationships we build.

4. Standards of Conduct

We expect everyone who works with TNB to behave in a manner consistent with our values, regardless of the situation or context. Every decision, action and relationship should reflect our approach to ethics, responsibility and transparency.

5. The principles we follow at Technica Nova Baltica

1. Environmental aspects

Responsibility for environmental impact

We operate in a sector that supports energy transition, which obliges us to care for the natural environment. We strive to minimise the negative impact of our activities on the environment, including through sensible planning, choosing responsible partners and caring for resources in our daily work.

Environmental awareness and cooperation in the value chain

We are not a manufacturer, but we have influence as advisors and contractors. That is why we promote responsible environmental attitudes among our colleagues and partners and, where possible, encourage actions in line with the idea of sustainable development.

2. Social aspects

Prohibition of forced labour and human trafficking

We do not tolerate any form of forced or slave labour, nor do we cooperate with entities that may contribute to it. Cooperation with TNB is based on voluntariness, transparency of conditions and mutual respect.

Prohibition of child labour

No persons below the legal working age under Polish law may be involved in TNB projects or those of our partners. We monitor compliance with this principle throughout the entire value chain.

Equality and non-discrimination

We ensure equal treatment regardless of gender, age, origin, religion, orientation, form of cooperation or disability. We create an environment free from discrimination and prejudice.

Freedom of association

We respect the right of persons cooperating with TNB to form and belong to organisations representing their interests, provided that this is done in a manner consistent with the law and ethical values.

Fair terms of cooperation and equal pay

We ensure clear, fair and transparent terms of cooperation. Every person, regardless of the form of their involvement, should receive remuneration commensurate with their responsibilities and agreements.

Health and safety (HSE)

The safety of those involved in our activities is a priority. We provide access to information and protective equipment, and promote a culture of safety – including in external projects.

3. Management aspects

Counteracting discrimination and bullying

We do not accept any form of psychological violence, intimidation, exclusion or mistreatment. We create an open, empathetic and supportive environment.

Confidentiality of information

We protect confidential data – our own, our partners' and our customers'. The obligation of confidentiality applies to everyone working with TNB and remains in force both during and after the end of the cooperation.

Avoiding conflicts of interest

We require openness and reporting of situations where private interests could influence professional decisions. Transparency and honesty are the basis of trust.

Compliance with laws and regulations

We comply with applicable laws and regulations in the countries where we operate, as well as with contractual and industry requirements relevant to our projects.

If legal requirements are stricter than internal rules, legal requirements take precedence. If internal rules are stricter, we follow internal rules.

When in doubt, we seek clarification before acting.

Counteracting anti-competitive practices

TNB operates in accordance with the principles of fair competition. We do not tolerate market collusion, abuse of position or practices that could distort the free market.

Counteracting money laundering and financial fraud

We do not engage in or support activities that could lead to money laundering, financial fraud or other illegal activities.

Anti-bribery and corruption; gifts and hospitality

Technica Nova Baltica has zero tolerance for bribery and corruption in any form. We do not offer, promise, give, request or accept bribes, kickbacks or any undue advantage to influence business decisions.

We do not make or accept facilitation payments (small unofficial payments intended to speed up routine actions).

Gifts, hospitality and invitations may only be offered or accepted when they are lawful, transparent, reasonable in value, and cannot be perceived as influencing decisions. If a gift or hospitality could create a conflict of interest or raise doubts, it must be declined or reported.

Whistleblowing procedures

Everyone has the right to report irregularities without fear of reprisals. We provide secure reporting channels and ensure complete confidentiality and fair consideration of each case.

Everyone cooperating with TNB is encouraged to speak up and report concerns in good faith whenever they observe conduct that may be illegal, unsafe, unethical or inconsistent with TNB values. Reporting channels, confidentiality rules and whistleblower protection are described in the Whistleblower Policy.

6. Accountability and implementation

Management is responsible for promoting ethical conduct and ensuring that this Code is communicated and understood.

Every person cooperating with TNB is responsible for acting in line with this Code, asking questions when unsure, and participating in awareness-building activities when required.

TNB periodically reviews this Code and related policies to ensure they remain adequate and effective.