

# Code of conduct

THE FOUNDATION FOR OUR BEHAVIOUR



**Sif**

OFFSHORE  
FOUNDATIONS

# Table of contents

	PAGE
<b>ABOUT OUR CODE</b>	<b>4</b>
<b>MISSION AND VISION</b>	<b>4</b>
<b>THE SIF SPIRIT: OUR CORE VALUES</b>	<b>6</b>
<b>OUR STANDARDS FOR CONDUCT</b>	<b>7</b>
<b>WORKPLACE SAFETY</b>	<b>8</b>
<b>FAIR LABOUR AND EMPLOYMENT PRACTICES</b>	<b>9</b>
<b>ENVIRONMENT</b>	<b>10</b>
<b>FAIR COMPETITION</b>	<b>11</b>
<b>CONFLICTS OF INTEREST</b>	<b>12</b>
<b>ANTI-BRIBERY AND CORRUPTION</b>	<b>13</b>
<b>SELECTION AND FAIR TREATMENT OF SUPPLIERS</b>	<b>14</b>
<b>CONFIDENTIALITY AND DATA PROTECTION</b>	<b>15</b>
<b>MEDIA AND COMMUNICATION</b>	<b>16</b>
<b>SPEAK UP</b>	<b>17</b>



**Sif**

OFFSHORE  
FOUNDATIONS





# A letter from our CEO

## “Together, we make impact!”

As designers and manufacturers of foundations for offshore wind energy, we understand the importance of having a solid foundation for our work processes and work ethics. Wind farms need to survive storms and rough seas to safely generate clean electricity for 25 years or longer. Owners, developers, designers, installers of wind farms as well as society need to have 100% trust in the quality of the foundations for their wind farms: in our monopiles. It is my personal drive to ensure that our internal foundation is based on the same level of trust, safety and sustainability!

Our employees are the foundation of our company. As much as customers rely on the quality of our foundations, colleagues must be able to rely on each other. Both our professional skills and aligned personal mindsets ensure that we contribute to a safe, healthy, and motivating work environment delivering high-quality products. Consistently, every day. We want our employees to enjoy their work, enjoy a fair remuneration and we want them to return home as safe and healthy as they started their working day

Naturally, we comply with governmental laws and regulations. To ensure we meet our ambitions, we focus on the right mindset and attitude that drive our professionals; ‘the Sif Spirit.’ The values that form the foundation of that Sif Spirit are described in this Code of Conduct and form the basis in specific value based policies. Aligning individual values with the values and standards of our company is key to our success. It is our vision to accelerate the energy transition. We believe we can achieve this through ‘hard’ professional skills on innovation, design, engineering and excellent manufacturing of monopile solutions. That mission however requires our ‘soft’ values of teamwork, focus on results and ownership to be successful. Core values that we live up to every day.

Shaping tomorrow. Performing today.

Fred van Beers,  
CEO of Sif

March 2024

“Living our Code of Conduct begins with each of us. We collaborate as a team to create a safe and sustainable workplace where we trust each other. Our skilled and motivated team members embody the Sif Spirit as we strive to live our mission.

This Code of Conduct is dedicated to ensuring that we are acknowledged for our exemplary ethical behaviour as designers and manufacturers of offshore foundations.”

# Code of Conduct

## ABOUT OUR CODE

In addition to laws and regulations, the determining factor in our behaviour is our own corporate culture which is based on our core values. This Code of Conduct includes the fundamental principles, standards and conduct necessary to pursue our vision of supporting and accelerating the growth of offshore wind power generation as a key driver to the world's energy transition. It shows that we aim to operate with the utmost integrity and ethics. As we all believe in what this code describes we decided to write this code from your perspective ("I").

## APPLICABILITY

This Code of Conduct applies to all fellow employees (hereinafter: "Team Members") of Sif Holding N.V. or any of its subsidiaries (hereinafter: "Sif Group" and/or "our organisation"). It also applies to whoever works for Sif Group on hire or subcontract basis or otherwise under instructions of Sif Group ("Temporary Team Members"). Other companies or their employees that work for or with Sif Group but do not qualify as Temporary Team Members are assumed to apply standards equivalent to the requirements set out in this Code of Conduct. In essence, our Code of Conduct supports all actions and decision at all levels for any interaction between (Temporary) Team Members and Sif Group's business partners.

## BEHAVIOURAL STANDARDS – WHAT I DO

Like anybody else I will familiarise with our Code of Conduct. I will live it and I will follow it. This means that I treat everybody with respect and that I will hold myself and my Team Members accountable for our behaviour. Amongst others, talking and evaluating compliance with the Code of Conduct is part of the annual performance appraisal for managers. It emphasizes the importance of compliant behaviour within our organisation and allows for discussion and improvement.

As I understand the importance of the Code of Conduct, I also understand that non-compliance with our values can have consequences for our organisation and could even lead to legal and/or disciplinary action. I am aware that a failure to comply with our Code of Conduct or related Policies may be reported to the appropriate authorities, depending on the nature of the non-compliance.

It is fully okay when specific questions arise about our Code of Conduct. Should this be the case, I will ask my line manager. The line manager can consult the compliance officer, HR or Confidant "vertrouwenspersoon". We have agreed that all questions must be answered in a clear and constructive manner to the person asking the question.

## Sif's mission

We want to be the best monopile solutions provider through innovation, engineering and excellent manufacturing, with commitment to the environment and our employees' well-being. This mission is the starting point for defining our organisational goals and strategy.

## Sif's vision

We want to accelerate the growth of offshore wind power generation as a key driver to the world's energy transition.



**Sif**

**OFFSHORE  
FOUNDATIONS**

Traditionally, our organisation served the markets in north-west Europe. We are gradually expanding our presence worldwide to support the growing offshore wind market. We shape our mission through governance of our operations and by taking responsibility for our people and the environment.

We have ambitious environmental, social and governance goals (hereinafter: "ESG goals"). Since we contribute to the global energy transition, we believe it is only logic to also contribute to the global sustainable development goals (hereinafter: "SDGs") as described in the Global Compact Strategy of the United Nations. The SDGs shape our ESG efforts, targets and ambition.

**THIS ESPECIALLY APPLIES TO THE FOLLOWING SDG'S:**



**Climate action**

(SDG 13)

This goal takes action to resolve climate change caused by human beings. The 2015 Paris Climate Agreement aims to achieve a reduction of the negative impact of climate change on people and nature



**Affordable and clean energy**

(SDG 7)

The development and use of technologies for energy efficiency and renewable energy sources are a practical way of reducing energy consumption and the dependency on fossil fuels. This will ultimately have a positive effect on our prosperity.



**Responsible consumption and production**

(SDG 12)

The aim of this goal is to improve mobility and infrastructure, and to reduce their negative aspects – including the environmental impact.



**Industry, innovation and infrastructure**

(SDG 9)

Sustainable production and consumption with a more efficient use of raw materials reduces the pressure on the environment and reduces the dependency on raw materials.



**Decent work and economic growth**

(SDG 8)

Goal 8 aims to promote inclusive and sustainable economic growth, full and productive employment and decent work for all.

Sif continues to fulfil its leading role in the worldwide chain of offshore wind foundations whereby it is essential to work together with our supply chain partners to deliver targeted innovation and sustainability improvements. We also facilitate renewable energy initiatives on our company sites such as a next-generation offshore wind test turbine. When designing and manufacturing our products and services, we work in a responsible, safe and environmentally friendly way.

We truly feel every safety incident is one too many and we adopt sustainable energy and environmentally friendly production methods in all operations. This includes (for example), implementing green transport from key suppliers to Sif facilities, induction preheating, reduced in-factory transport and/or emission-free fuels and transport between sites, (testing of) production of wind energy and green hydrogen and researching or seeking out other ways to reduce the gross CO2 emissions in supply chains. We also develop innovative solutions to recycle monopile foundations in time and we maximise the capturing of separated manufacturing scrap/waste to contribute to a circular economy.

# The Sif Spirit: Our core values

Core Values are important to me and to the identity of the organization; they guide the desired attitudes and behaviours of our team. Our three core values of ownership, teamwork and a result-oriented approach guide me in everything I do:



## > I SHOW OWNERSHIP

I take my tasks, authorities, and responsibilities seriously.  
I set a good example, keep my promises, and ask for help.  
I realise what the impact of my actions is on others and  
I take responsibility for the results thereof.



## > I WORK TOGETHER WITH MY TEAM MEMBERS

We trust each other and make use of each other's qualities.  
We hold each other accountable, help each other, and make sure work is handed over properly.  
We are open, listen to each other, and try to understand each other.



## > I AM RESULT-ORIENTED

Like everyone within the organisation, I know my personal goals and the collective goals of our organisation.  
Everything I do, I do to the best of my ability to achieve our collective goals.



**Sif**

**OFFSHORE  
FOUNDATIONS**

# Our Standards for Conduct

I respect the standards to live by our core values. These standards describe what Sif's commitments are and why they are important for us. Our standards include the following eight themes:

## 1. Workplace safety

Am I prioritizing safety at work by following guidelines and reporting hazards?

## 5. Conflicts of interest

Am I avoiding situations where my personal interests interfere with my work?

## 2. Fair labour and employment practices

Am I treating others with fairness and respect, just like I expect to be treated?

## 6. Anti-bribery and corruption

Am I vigilant to prevent bribery and corruption?

## 3. Environment

Am I contributing to protecting the environment in my daily work?

## 7. Selection and fair treatment of suppliers

Am I doing business based on objective criteria?

## 4. Fair competition

Am I practicing honest and ethical business?

## 8. Confidentiality and data protection

Am I respecting sensitive information and data privacy?

# 1. Workplace safety

“All accidents and incidents can be prevented; stay safe and keep each other safe!”

## OUR COMMITMENT

Health and safety are the number one priority within Sif. We contribute to and support a healthy, sociable, mentally and physically safe workplace by complying with our safety, health and quality standards. Sif believes that everyone should return home safe after a day's work and in the long run enjoy a healthy retirement.

## WHY IT MATTERS

I acknowledge the risks that my Team Members and business partners are exposed to in our daily operation. My key priority is to keep everyone safe and healthy. I aim to prevent safety incidents which could impact the well-being of my Team Members and business partners or disrupt the production process.

## WHAT I DO

- > I familiarise myself with the applicable safety practices and Health, Safety and Environment (hereinafter “HSE”) procedures.
- > I am aware of the hazards present in our daily operation on the workflow and express safety concerns.
- > I avoid putting myself or fellow workers at risk and interfere immediately if I see someone put himself at operational risk. These risks can follow from working procedures or from the mental or physical state of people on the work floor resulting for example from illness, external and extreme pressure or the influence of drugs, alcohol, or other substances.
- > I ensure that I know and can perform the procedures in case of an emergency in the workplace.
- > I prioritize safety (for example: safety over speed in production).
- > I ensure my workplace is tidy and is handed over tidy to my colleagues.

For more information on quality, health, safety and environmental practices, please read the policy statement.

**Q:** I just discovered that one of our vendor workers has been drinking on our premises. He is officially not a team member of our organisation. Should I be concerned?

**A:** Yes, you should be genuinely concerned. This behaviour puts the safety of our workplace and everyone at risk. Ensuring workplace safety is crucial regardless of whether someone is our team member. It is important to report this to your manager or the compliance officer

## WHO CAN YOU CONTACT?

If you see a risk to health, social, physical or mental safety, or environmental standards being compromised at our organisation, you should report it to your line manager or supervisor. They will then give input on the appropriate solution or consult with the compliance officer. You may also report via our speak up channel. Read the below section on **Speak Up** for further details.



**Sif**

**OFFSHORE  
FOUNDATIONS**



## 2. Fair labour and employment practices

“We treat others with respect and dignity!”

### OUR COMMITMENT

We commit ourselves to fair labour and employment practices. This means that we respect that our organisation has no room for discrimination, inappropriate behaviour of any kind and forced labour or child labour. We underline the Universal Declaration of Human Rights for our Team Members, Temporary Team Members, and Business Partners.

As an organisation with people from various backgrounds, it is especially important that we uphold human rights and individual freedoms. Everyone in our organisation is expected to treat our colleagues, customers, suppliers, business partners and competitors in an honest and respectful way.

### WHY IT MATTERS

Fair labour and employment practices benefit all our associates, as well as society, and provides the foundation to support our commitment to human rights.

### WHAT I DO

- > I assess people based on what they do, and not on who they are; I value the power of diverse teams where backgrounds or personal preferences can be assets to the team-performance and complementary to professional skills, experience and attitude
- > I contribute to creating an inclusive working environment with equal opportunity, regardless of age, (dis)abilities, gender, marital status, race, nationality, ethnicity, religion or origin.
- > I treat everyone with respect and dignity; I value different opinions and convince Team Members with facts and arguments and will never use intimidation and aggression.
- > I respect the cultural practices and values of both the country where we work and the people we work with.

### AS A COMPANY:

- > All decisions related to employment, such as hiring and promotions, are done fairly and legitimately. This should be based on merit and business needs and on the standards that apply to working in the jurisdiction where Sif is active: we respect everyone's rights to trade union membership, freedom of strike and movement and decent housing for both domestic labour and labour migrants
- > We maintain equal pay for equal work; transparent terms with respect to wages, overtime pay, payment periods, working hours, rights to rest and holidays

For more information on fair labour and employment practices, please read the personnel manual or consult your Human Resources officer.

**Q:** What should I do if I hear someone using racist language?

**A:** It is important to act. Remember that we share the responsibility to create a respectful and collaborative workplace. You can address the team member directly and state that their behaviour is not acceptable in our organisation. You can also speak with your manager or the compliance officer if you are not comfortable to address the team member directly.

### WHO CAN YOU CONTACT?

We encourage you to speak up if you notice any inappropriate or unacceptable behaviour. You can report this to your line manager or supervisor, to the compliance officer or to the external confidential counsellor. You could also report via our speak up hotline or confidentially via our whistleblowing channel. Read the below section on **Speak Up** for further details.

## 3. Environment

“We take care of our environment.”

### OUR COMMITMENT

At Sif, we take responsibility for the protection of the environment and we minimise the environmental impact of our activities and products. We research and develop environmentally friendly technologies and incorporate environmental awareness in our designs, fabrication, distribution, and removal. As an example, we work on facilitating shore power grid connections for all vessels at our quayside at Maasvlakte 2 to limit the use of diesel generators for or on the vessels. We aim to maximize the circularity of our products and production resources and limit the use of unrenewable sources in our manufacturing process like fossil energy and clean water.

### WHY IT MATTERS

We want to continue our leading role in accelerating the global energy transition through our production process, products and services. By applying state of the art production processes and services the environmental impact of our activities and products is reduced.

### WHAT I DO

- > I take responsibility to efficiently use or if possible replace scarce resources such as gas, water and oil and minimise the environmental impacts during production and logistical process.
- > I take responsibility to reduce the amount of waste, like collecting and segregating in appropriate bins.
- > I am aware of our activities and their impact on our environment and report any spills, unusual emissions to the air or water or any incidents with environmental impact during production and logistical process.

**Q:** I notice that there is a hazardous substance leaking from a manufacturing machine. Repairs will take a week and our team has a manufacturing target to meet. Should we pause the work to repair the leak, even if that means that we may not meet the target?

**A:** Yes. We are committed to work in a responsible, safe, and environmentally friendly way. We prioritise the safety of team members and our commitment to sustainability. In any case the machine should not be run if the safety of our team members and business partners and the environment is at risk. Any commercial concern should be discussed with your line manager or compliance officer

### WHO CAN YOU CONTACT?

Discuss suspicions or known breaches of environmental laws or HSE standards with your line manager or the compliance officer. They will give input on a solution or consult with the HSE manager. The compliance officer can also be consulted if your concern relates to the environment. Reporting confidentially is also possible via the whistleblowing channel. Read the below section on **Speak Up** for further details.



**Sif**

**OFFSHORE  
FOUNDATIONS**

## 4. Fair competition

“We support fair competition.”

### OUR COMMITMENT

As one of the leading providers of offshore foundations, Sif operates in a transparent market with a limited number of customers and vendors of monopile foundations. We want to be the role model in the market for respecting fair and honest competition. We uphold this in the various jurisdictions we operate in. These jurisdictions typically restrict information sharing which could lead to price fixing or territorial division, as well as market manipulation and distortion

### WHY IT MATTERS

Competition encourages innovation and improvements, resulting in a wider range of products available at fair prices. This benefits both customers and society.

### WHAT I DO

- > I act with integrity and fairness when dealing with customers, suppliers, distributors and competitors.
- > I seek guidance from the Compliance Officer regarding communications with competitors or associations, especially if these communications involve (requests for) proposals or information on tendering.
- > I apply information barriers by limiting communication on a need-to-know basis, especially for joint ventures and when any cooperation of a competitor is involved.
- > I avoid discussing strategies with competitors involving the identities of customers, suppliers and business partners.

For more information on fair and free competition, please consult the policy on do's and don'ts when discussing with other parties in our industry.

**Q:** We participate in an association of offshore wind manufacturers. There is an invitation to have an off-the-record discussion. What should I do?

**A:** You should reject the invitation. We must not discuss any strategic or sensitive matters with competitors. If you are already present in a meeting and the discussion leads to a non-public, strategic or sensitive topic, you should leave the meeting immediately. The fact that you leave the meeting must be documented (e.g., in the meeting minutes or by notifying the compliance officer).

### WHO CAN YOU CONTACT?

Report any discussion or agreement with our competitors relating to unfair business practices to your line manager or supervisor. They will then give input on the appropriate solution or consult with the compliance officer. Reporting confidentially is also possible via the whistleblowing channel. Read the below section on **Speak Up** for further details.

## 5. Conflicts of interest

“We avoid situations where personal interests interfere with work.”

### OUR COMMITMENT

It is crucial that we pay close attention to conflicts of interest. This means that we should avoid situations where our personal interests might clash with the interests of our organization. Even the appearance of a conflict harms both our reputation as well as your own reputation. We must share any relevant information regarding any (potential) conflict as soon as it is known. This supports thorough assessment and action.

### WHY IT MATTERS

We aim to keep the trust and confidence of everyone we engage with. It is essential that we make decisions serving the best interests of our organization.

### WHAT I DO

- > I disclose all (potential) perceived conflict(s) of interest to my line manager and/or compliance officer to assess any risk and put in place mitigations, especially if conflicts of interest might influence our decisions and actions. The following are common situations where a potential conflict of interest may arise:
  - > in situations where a family member works for a supplier or applies at Sif; or
  - > when we have any role, engagement or financial interest in any party that competes with our organisation, is our customer, supplier, or any other business partner.
- > I disclose any business position that I perform outside of our organisation.
- > I disclose personal transactions in financial instruments related to Sif, its commercial partners and the offshore wind industry for selected positions in our organisation;
- > I follow Sif's instructions on insider trading as defined by the policy on Insider Trading;
- > I protect the confidentiality of any information and data relating to customers, suppliers, vendors, sub-contractors or any parties that cooperate with our organisation.

**Q:** When could a conflict of interest arise?

**A:** Think about a second job, a family relation working at a competitor, roles that you have as advisory board /director for another entity within our organisation or for a social organisation, professional activities you perform for competitors, your previous employment with our business partner, financial interest or investment in a publicly traded or private company, or relationship with public officials or their family members.

### WHO CAN YOU CONTACT?

Discuss any conflict of interest concern with your line manager/supervisor. They will then give input on the appropriate solution or consult with the Compliance Officer. Reporting confidentially is also possible via the whistleblowing channel. Read the below section on **Speak Up** for further details.



**Sif**

**OFFSHORE  
FOUNDATIONS**



## 6. Anti-bribery and Corruption

“We are vigilant on preventing bribery or corruption. This is regardless of offerings or requests for services.”

### OUR COMMITMENT

We combat all forms of corruption, including extortion and bribery. We never offer or accept any gift or payments to secure business in the jurisdictions where we operate, regardless of the form. This prohibition includes a facilitation payment, which is a small payment or bribe made to expedite or secure routine government services or actions that we are already entitled to. We need to remember that what is legal in one jurisdiction, might be illegal or discouraged in others.

### WHY IT MATTERS

Preventing bribery and corruption is crucial for maintaining trust, fairness, and integrity in our business practice. The consequences of these actions could be severe for our organisation and any person involved.

### WHAT I DO

- > I follow our policies on registering gifts, invitations and entertainment.
- > I report direct and indirect offerings of and requests for gifts, invitations and entertainment to my direct manager and request approval from the compliance officer in case of any exemption.
- > I maintain complete and accurate records of transaction, payment, expenditures with our customers, suppliers, vendors, and sub-contractors to prevent fraud.
- > I take extra care when dealing with public officials.
- > I obtain prior approval for any payment request from any party to facilitate a certain process prior to payment following our authorisation matrix.
- > I ensure that our business partners understand our stance to combat corruption and bribery as laid down in our Code of Conduct and Anti-Bribery and Corruption Policy, especially when they represent us in a jurisdiction where the corruption risk is high.

For more information on our commitment to anti-bribery and corruption and applicable policies on gifts and entertainment policy, please read the [Anti-Bribery and Corruption policy](#).

**Q:** I am contacted by an official who handled one of our licenses which will soon expire. He told me that the processing of our application has not started and may take longer due to the volume of requests they are handling. He told me that a small envelope would speed up the process. What should I do?

**A:** You must refuse the offer. This is a facilitation payment and is prohibited. You should report this to the compliance officer.

### WHO CAN YOU CONTACT?

Discuss any concern of facilitation payment, gifts or invitation with unreasonable value or involving a public official or a supplier/subcontractor to your line manager/supervisor. They will then give input on the appropriate solution or consult with the compliance officer, or, if necessary, to the external confidential counsellor of the company. Reporting confidentially is also possible via the whistleblowing channel. Read the below section on **Speak Up** for further details.

## 7. Selection and fair treatment of suppliers

“We do business on the basis of objective and predefined criteria.”

### OUR COMMITMENT

We operate with respect, transparency and impartiality while we maintain our knowledge of the parties we cooperate with. We must ensure that our products, services, and funds do not originate from and are not used for criminal activities. In principle, our business partners must follow the ethical standards set in our Code of Conduct.

### WHY IT MATTERS

We maintain the quality of relationships with business partners beyond the provision of goods and/or services. We will be especially scrutinised on our selection process of suppliers as well as their commitment to live up to our standard of conduct.

### WHAT I DO

- > I follow internal due diligence procedures to ensure that we work with suppliers, vendors and sub-contractors with legitimate business activities and whose money does not originate from illegal activities.
- > I ensure that suppliers, vendors and sub-contractors understand our ethical and integrity standards.
- > I require suppliers, vendors and sub-contractors to meet our standards and expectations.
- > I maintain accurate business and financial records and documentation relevant to our business relation with suppliers, vendors and sub-contractors.
- > I maintain the confidentiality of information we receive from our suppliers, vendors and sub-contractors.
- > Sif pays our suppliers, vendors and sub-contractors a reasonable compensation for their services in a timely manner, unless there is a fair reason not to do so.
- > I terminate business relations with suppliers, vendors and sub-contractors who do not uphold the quality and standards set by Sif.

For more information on selection and fair treatment of suppliers, please read the [Human Rights policy](#).

**Q:** I have received confidential information stating that one of our vendors is under investigation for forced labour allegations. What should I do?

**A:** You must report this to the Compliance Officer prior to discussing further with the vendor. It is necessary to promptly reach out to the vendor involved and ascertain the facts behind the allegations unless this will be a tipping off offence. The Compliance Officer will facilitate communication and will assess any potential violations to applicable laws and/or our Code of Conduct. The Compliance Officer will also establish a remediation plan for regular monitoring. We must end the business relationship in case of severe non-compliance that cannot be remediated.

### WHO CAN YOU CONTACT?

Discuss any concern regarding the selection and fair treatment of suppliers to your line manager/supervisor. They will give input on a solution or consult with the compliance officer. Reporting confidentially is also possible via the whistleblowing channel. Read the below section on Speak Up for further details.



**Sif**

**OFFSHORE  
FOUNDATIONS**

## 8. Confidentiality, intellectual property rights and data protection

“We respect sensitive information and data privacy.”

### OUR COMMITMENT

We commit to handle information entrusted to us responsibly by respecting confidentiality, intellectual property rights and data protection. We adhere to the protection of personal data in our operations.

### WHY IT MATTERS

We process both personal and commercial data to conduct business. We respect and acknowledge the importance of protecting privacy and data protection of all Sif Team Members and business partners by following applicable EU and national legislation. This also applies to the protection of our cyber and IT security system used in our operations.

**Q:** I will soon be leaving Sif Group and there are documents related to my work in my personal email. What should I do?

**A:** You must delete all Sif Group information in your personal email. You must hand over any hard copy documents to an authorised person in our organisation. Talk to your (former) line manager in such cases.

### WHO CAN YOU CONTACT?

Raise your question or discuss your concern regarding privacy and personal data to our Privacy Officer. Report **immediately** to the Privacy Officer in case of any breach of privacy and personal data regulations. Reporting confidentially is also possible via the whistleblowing channel. Read the below section on **Speak Up** for further details.

### WHAT I DO

- > I collect, retain, and transfer personal data only with the owner's consent, excluding information related to health, ethnicity, sexual orientation, religion, or political views, and limit my collection to what is strictly necessary for work purposes. I adhere to all applicable policies and the EU General Data Protection Regulation (GDPR).
- > I respect the privacy of colleagues and employees of business partners.
- > I allow access to personal data only to those who have a legitimate purpose on a need-to-know basis.
- > I immediately report any loss of the IT tools or resources (e.g., laptop, company phone) of our organisation to the Head of Information Technology.
- > I change my log-in password(s) frequently.
- > I beware of phishing attacks targeting our confidential commercial or personal data. I report this to my dedicated Privacy Officer.
- > I respect the intellectual property rights of Sif's Business Partners and assist the Sif organisation in protecting its own intellectual property rights.

For more information on confidentiality and personal data, please read the GDPR policy.

**Q:** I received an email to my private email address where our CEO warns that my salary may be reduced due to regular absence at work. There is an instruction to clarify my work schedule by clicking a link. Should I click the link?

**A:** First you need to check whether the email was sent from an email address of our organisation, or for other signs that the email is fraudulent (e.g., incorrect spelling, differing email address to name of sender, unknown email address). Do not click on the link and report this to your manager if the email appears to be fraudulent. In any case, we should also avoid using personal email addresses for work purposes.

# Media and communication

“We speak on behalf of our organisation only if authorised.”

We recognise that each of us is an ambassador of our brand and reputation. We are committed to safeguarding and upholding the integrity of our brand in all interactions. It is crucial to understand that every statement we make on behalf of our organisation has a direct impact on our reputation, both internally and externally. Therefore, we must communicate in a positive and accurate manner which aligns with our core values.

Only authorised individuals determined by the appropriate level of management are permitted to speak publicly on behalf of our organisation. This includes the use of social media, e.g., Twitter and LinkedIn, where the authorised individual should also indicate their function within our organisation. This applies to all media requests, regardless of the nature, such as off-the-record or confidential enquiries.

**Q:** A journalist calls me enquiring about the activities within our organisation. What should I do?

**A:** Decline to comment if you are not authorised to speak on behalf of our organisation. Promptly direct all enquiries to the dedicated Spokesperson. We maintain a unified and controlled message which accurately represents our position and protects our reputation this way.

**Q:** What can I share about my life at work on social media?

**A:** Always use your best judgement when posting online about our organisation and services. It is essential to make a distinction between personal opinion and those representing the views of our organisation. Furthermore, it is strictly prohibited to record or photograph any person, Sif's equipment, or product (e.g., monopiles, transition pieces, etc.) that could be linked to a company's name or project name.



**Sif**

**OFFSHORE  
FOUNDATIONS**



# Speak up

“Speaking up is the responsibility of everyone.”

We foster a culture of openness and responsibility, where every individual is encouraged to speak up and ensure that our core values are upheld. We are fully dedicated to actively listen and address concerns raised by our stakeholders. We play a vital role in protecting our integrity and maintaining an ethical workplace for everyone involved by reporting any violation to our Code of Conduct.

The following internal and external channels are available to Speak Up. At first instance, you should report internally before reaching out to external parties so we can perform a timely investigation.

> **Direct manager/supervisor.** This is the person that we report to daily.

> **Reporting Officer.**

> **Confidant.** We appoint external Confidants as the contact persons for our (Temporary) Team Members for a variety of matters, such as labour disputes or concerns.

> **Whistleblowing channel.** Reporting via this channel is confidential with an option for anonymity.

We recognize that speaking up may be difficult to do. That is why we take measures to ensure that confidentiality and anonymity is maintained. All reports are handled confidentially regardless of the reporting channel that you choose. A limited number of persons have access to the information provided.

Reports may be made anonymously via the whistleblowing channel or Confidant. We require that all persons involved in a Speak Up notification adhere to the confidentiality and anonymity requirements and standards.

Retaliation against those who raise a concern, or anyone involved in an investigation, is considered a breach of law and our Code of Conduct. Retaliation of any kind will not be tolerated and may lead to disciplinary action. You can report this to the above contact persons.

For more information, please read the [Whistleblower policy](#).