



Code of Conduct & Ethics

1. Introduction

At ASTERN ENERGY GmbH, we are committed to conducting our business with the highest standards of integrity, professionalism, and ethical conduct. Our Code of Conduct & Ethics sets forth the principles and guidelines that govern the behavior of all employees, directors, officers, contractors, and representatives of ASTERN ENERGY GmbH in their interactions with colleagues, customers, suppliers, and other stakeholders.

2. Compliance with Laws and Regulations

We are dedicated to complying with all applicable laws, regulations, and company policies in every aspect of our business operations. We conduct our business ethically and with integrity, ensuring transparency and accountability in all our dealings.

3. Respect for Individuals

We value diversity, respect the dignity and rights of all individuals, and foster a work environment that is free from discrimination, harassment, and intimidation. We treat each other with fairness, dignity, and respect, regardless of race, ethnicity, gender, age, religion, disability, or any other characteristic.

4. Integrity and Honesty

We uphold the highest standards of honesty, integrity, and ethical behavior in all our actions and decisions. We do not engage in any form of dishonesty, fraud, or deceit, and we strive to maintain transparency and accountability in our interactions with colleagues, customers, and other stakeholders.

5. Equal opportunity

All individuals are assessed based purely on their merit and the value they bring to ASTERN ENERGY GmbH's success. We have zero tolerance for any type of discrimination prohibited by law.

6. Conflict of Interest

We avoid conflicts of interest or the appearance of conflicts of interest in our business activities. We disclose any potential conflicts of interest promptly and take appropriate measures to mitigate or manage them in a manner that upholds the best interests of ASTERN ENERGY GmbH.

7. Protection of Company Assets

We are responsible for safeguarding and responsibly using the assets and resources of ASTERN ENERGY GmbH, including intellectual property, confidential information, and physical assets. We use company resources efficiently and only for legitimate business purposes.



8. Confidentiality

We respect the confidentiality of sensitive information entrusted to us by ASTERN ENERGY GmbH, its customers, and other stakeholders. We maintain the confidentiality of such information and only disclose it when authorized or required by law.

9. Environmental and Social Responsibility

We are committed to minimizing our environmental impact and promoting sustainable practices in our business operations. We strive to contribute positively to the communities in which we operate and uphold high standards of corporate social responsibility.

10. Reporting Violations

We encourage all employees to report any suspected violations of this Code of Conduct & Ethics promptly through the appropriate channels. ASTERN ENERGY GmbH prohibits retaliation against individuals who report violations in good faith.

11. Relationships with counterparties and partners

Our business thrives on enduring partnerships forged over time, reflecting the value we place on collaborative endeavors. However, every party we engage with undergoes stringent, risk-based Know Your Customer (KYC) and Know Your Business (KYB) procedures and monitoring.

12. Compliance and Enforcement

All employees, directors, officers, contractors, and representatives of ASTERN ENERGY GmbH are expected to adhere to this Code of Conduct & Ethics. Violations of this Code may result in disciplinary action, up to and including termination of employment or contractual relationships.

13. Commitment to Human Rights

ASTERN ENERGY GmbH is committed to upholding human rights in alignment with the principles outlined in the UN Sustainable Development Goals and Guiding Principles on Business and Human Rights. We strive to ensure fair treatment and dignity for all individuals involved, both within our organization and throughout our supply chain.

14. Conclusion

ASTERN ENERGY GmbH is committed to upholding the highest standards of integrity, ethics, and professionalism in all aspects of our business operations. By adhering to the principles outlined in this Code of Conduct & Ethics, we strengthen our reputation, build trust with our stakeholders, and contribute to the long-term success and sustainability of ASTERN ENERGY GmbH.

Ivan Khodov

A handwritten signature in blue ink, appearing to read "Ivan Khodov", is written over a light blue horizontal line.

General Director
ASTERN ENERGY GmbH

30 April 2024