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Corporate Social Responsibility Policy

Purpose

The purpose of this policy is to ensure that Vento has established a clear Corporate Social Responsibility (CSR) Policy and to ensure that the policy is communicated to all stakeholders.

Scope

This policy applies to all employees, subcontractors, and at all locations where Vento Energy Support operates.

Responsibility

Management:

Uphold and Promote a robust CSR strategy. This strategy must be aligned with the company's values and vision while meeting the expectations of stakeholders, including employees, clients, investors, and society as a whole.

Employees:

We expect all employees/subcontractors to take responsibility to perform a social and ethical behavior in the daily working with customers, subcontractors and other interested parties according to the described policy.

Definitions:

CSR:

This Corporate Social Responsibility Policy (CSR policy) describes Vento Energy Supports overall responsibility to society and the environment, including a broad range of initiatives and impacts.

COC:

The Code of Conduct holds a specific set of guidelines that outlines the acceptable behavior for employees, suppliers, or other stakeholders, and the key principles in relation to ethical conduct, human rights, and environmental protection.

Policy

The below outlines Vento Energy Supports policy on commitment to operating in an ethical and sustainable manner, positively impacting society and the environment. This policy aims to disclose how a Vento integrates social and environmental concerns into our business practices and interactions.

The CSR Policy is placed on the company's website to ensure availability to all interested parties.

Human Rights

At Vento, we are committed to respecting, promoting, and protecting the human rights of all individuals affected by our business operations. We recognize that businesses have a responsibility to uphold human dignity and ensure that our practices align with international human rights principles.

Our Human Rights Policy is rooted in:

- The United Nations Guiding Principles on Business and Human Rights
- The Universal Declaration of Human Rights
- The International Labor Organization (ILO) Conventions

Working conditions and human rights

Vento Energy Support acknowledge the right of every individual to freely express their views and opinions. Employees, partners, and stakeholders are encouraged to raise their concerns and ideas in a respectful manner without fear of retaliation.

- We are committed to protecting the privacy of our employees, customers, and other interested parties. Personal data is collected and handled in compliance with data protection laws, and every effort is made to prevent unauthorized access or misuse.
- We do not tolerate arbitrary actions against individuals based on their political, social, or personal beliefs. We are committed to ensuring that all employees are treated fairly and in accordance with the rule of law.

Financial and cultural rights:

Vento provides fair wages and ensures that employees receive compensation that meets or exceeds local legal standards. We promote fair labor practices and provide safe working conditions to foster economic security.

- We respect the cultural rights of all individuals, ensuring that our employees and stakeholders can freely practice their cultural traditions and express their cultural identity without fear of discrimination or exclusion.
- We engage with suppliers who align with our human rights values. We expect our suppliers to provide fair wages, protect workers' rights, and respect local customs and cultural practices.

Diversity, Equity and inclusion:

Diversity, equity, and inclusion are fundamental principles that guide our operations and interactions with employees and customers wherever we operate.

- We strive to create an environment where individuals of all backgrounds can thrive and are committed to providing equal opportunities for all employees and job applicants. Decisions regarding hiring, promotions, compensation, and training are based solely on merit, qualifications, and business needs.
- We promote inclusive leadership in our organization. Managers are expected to recognize diversity and create opportunities for underrepresented groups to participate fully in our business where possible.

Discrimination and exposed groups:

Discrimination based on race, gender, age, religion, sexual orientation, disability, nationality, ethnicity, or any other protected characteristic is strictly prohibited. We are committed to providing a safe and inclusive environment, where we do not allow discrimination, harassment or bullying.

- We provide reasonable conditions for employees in our administration with impairments to ensure they can perform their duties effectively and participate fully in the workplace. This includes adapting to physical environments, providing assistive technologies, and offering flexible working arrangements where needed.
- We protect employees from retaliation if they report discrimination, harassment, or any other violation of this policy. We encourage the use of our reporting mechanisms to address such issues promptly and confidentially.

Child labor and modern slavery:

A child should have the best conditions when it comes to health, school or free time. In our part of the world child labor is not necessary, and therefore we do not employ anyone younger than 18 years.

By the employment of any employee, we request valid documentation for their age.

- We do not allow modern slavery in our company and are committed to not conducting business with any organization that practices modern slavery and/or employ children younger than 15 years.

Forced labor and human trafficking:

Employees are often required to work independently and with a big responsibility towards the safety of coworkers and our customers property. This would never be possible for us if we used forced labor. We need the trust and consciousness between management and workers, which can only be granted with a great thriving in all aspects of employment.

No employee is working under threat or at risk of penalty in case of unintended errors. Any employee has the freedom to terminate his/her employment at any time.

Labor Rights

We believe that every individual has the right to meaningful employment. Employees will adhere to legal standards regarding working hours, overtime, and rest periods. Regular work hours will be clearly defined, and overtime will be compensated for as per applicable labor laws.

Social protection and dialogue:

Employees have the right to form, join, or refrain from joining trade unions and other organizations of their choice.

- We respect the rights of workers to engage in collective bargaining and will engage in good faith discussions with recognized employee representatives.
- Vento will adhere to national and international labor standards related to social protection, including but not limited to unemployment benefits, pension schemes, and family leave.

Employee health and safety

Vento Energy Support offer a workplace where health, safety and continual personal development are in focus.

- We conduct regular workplace assessments to ensure the thriving of our employees and a healthy and safe working environment. A clear procedure is in place for investigating and addressing reported issues.
- We monitor dangerous weather that could affect our work, and we plan ahead to keep everyone safe and prevent damage.
- We do fire safety checks and have emergency plans ready, and we train different emergency scenarios with all our employees, so we are ready if a live critical situation occurs.
- We have a zero-tolerance policy for the use of drugs and alcohol at work for all our employees.

Career Management and training

Vento Energy Support invests in the professional growth of our employees by offering access to training, development programs, and advancement opportunities.

Environment

At Vento Energy Support, we prioritize environmental sustainability and are committed to reducing our greenhouse gas emissions.

- We consistently strive to minimize our energy consumption while prioritizing clean and renewable sources, in order to respect the environment and preserve natural resources.
- We recycle as much waste as possible and have a continuous focus on waste management.
- In every task we undertake, we strive to minimize our environmental impact as much as possible.

Business ethics

International Standards:

We respect all human rights and follow all laws and international standards for good business behavior, like UN Global Compact.

Anticorruption and bribery:

Vento upholds a strict zero-tolerance policy toward any form of corruption or bribery, which is stated in HR.011 Corruption and bribery Policy.

Anticompetitive practices:

We are committed to operating in compliance with all applicable antitrust and competition laws.

Employees are prohibited from engaging in practices that restrict fair competition, such as price-fixing, market allocation, bid-rigging, or abuse of market power.

Information Management:

Vento is committed to managing information responsibly, safeguarding the confidentiality, integrity, and availability of all business data, and complying with data protection laws as stated in HR.005 General data Protection regulations Procedure.

The company strives to maintain the accuracy and reliability of all information used for decision-making, reporting, and communications. All employees are responsible for ensuring that all business records, financial statements, and communications reflect the true and accurate content.

The company has implemented appropriate cybersecurity measures, including encryption, access control, and regular security audits, to protect sensitive information from unauthorized access, theft, or breaches. This is elaborated in MS.006 IT Security Policy.

Promote social responsibility in the supply chain:

Vento is committed to promoting ethical, sustainable, and socially responsible practices across its supply chain. Suppliers will be required to adhere to Vento's supplier code of conduct which covers labor standards, environmental sustainability, and human rights.

We evaluate our supply chain's compliance with social responsibility standards and take corrective action where necessary. Non-compliance by suppliers may result in contract termination or other sanctions.

Claims management / whistleblower:

Any abbreviation from the above should be reported internally if observed by an employee. For this we have a whistleblower procedure in place, which is informed throughout the organization and accessible to all employees.