



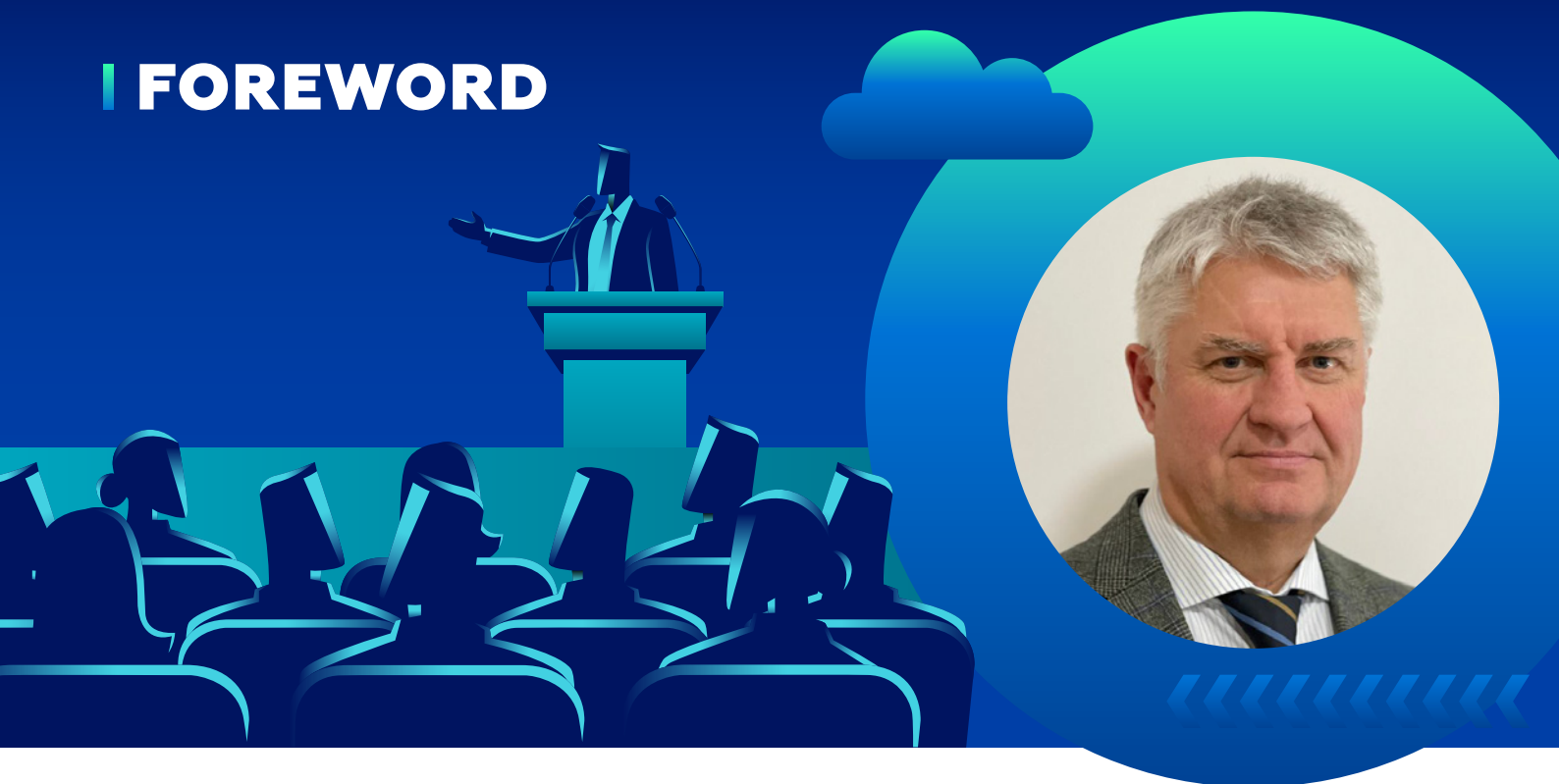
CODE OF BUSINESS CONDUCT AND ETHICS **PUBLIC UNION** **"UKRAINIAN WIND ENERGY ASSOCIATION"**



UWEA

UKRAINIAN
WIND ENERGY
ASSOCIATION

I FOREWORD



DEAR MEMBERS AND PARTNERS OF THE UWEA!

The Public Union “Ukrainian Wind Energy Association” is a non-profit organization that acts as a leading platform for communication and cooperation in the large-scale deployment of wind energy technologies, energy storage solutions, and distributed generation across the country. Its mission includes promoting the “green” transformation of Ukraine’s unified energy system, and facilitating the nation’s post-war recovery through clean energy sources, energy independence, and sustainable development. We are the largest professional association in the renewable energy sector of Ukraine, dedicated to defending the interests of the wind energy sector at both the national and international levels. Our activities are founded on the principles of honesty, transparency, trust, and mutual support. We aim to foster fair relationships among all market participants, engage openly with government authorities, maintain partnerships with international organizations, and ensure the industry’s development based on ethics, respect, and professional responsibility. Today, issues such as information security, labor protection, environmental responsibility, and respect for human rights are of

particularly important as they shape the reputation of Ukrainian businesses worldwide.

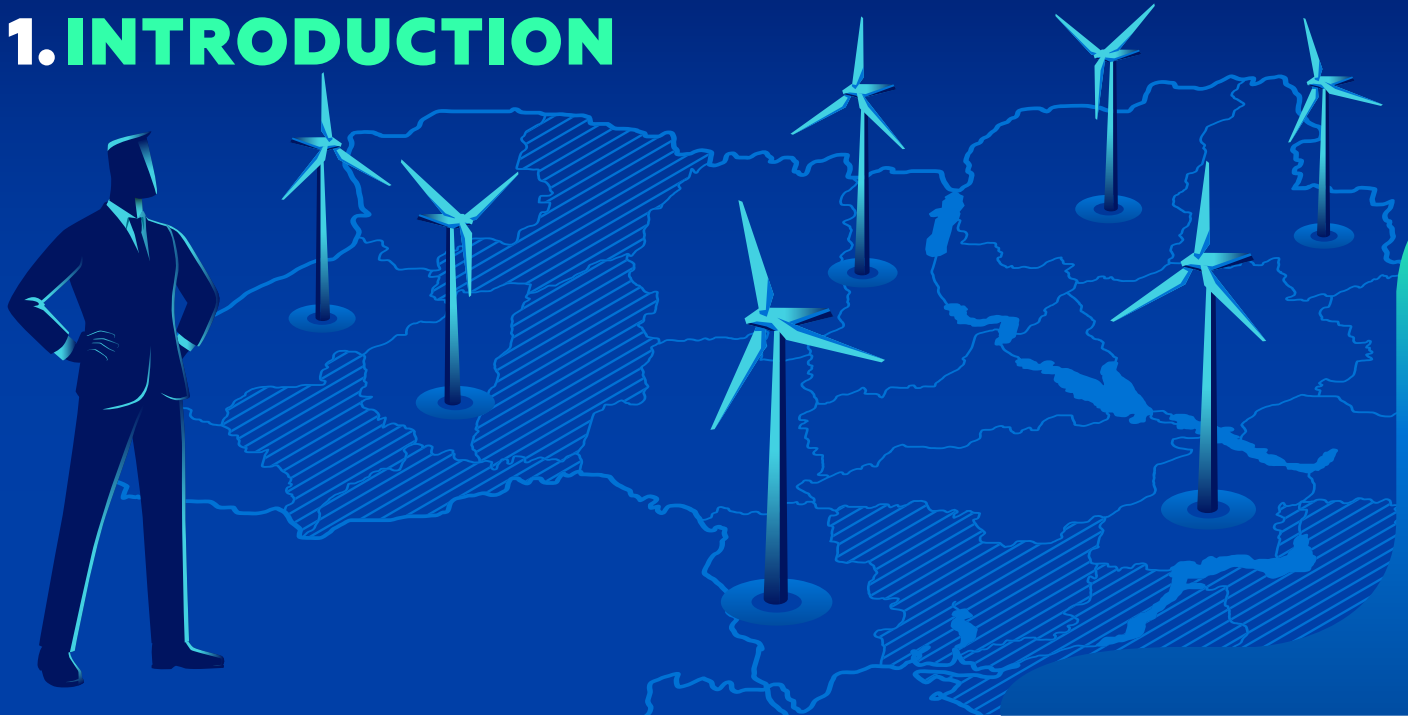
Building long-term relationships with the Members of our Association, its Partners, and all stakeholders in Ukraine’s renewable energy sector is the foundation of our activities. Our Code of Business Conduct and Ethics serves as more than just a document; it is a framework of values that guides each member company of UWEA. This framework encourages the development of a corporate culture that aligns with the best European practices, fostering mutual trust, sustainability, and respect in our collaborative efforts.

We extend our gratitude to all companies — both current and future UWEA Members — for their commitment to ethical conduct, transparent partnerships, and their contributions to the advancement of wind energy, which symbolizes Ukraine’s recovery and resilience. Together, we are shaping the energy future of our country — clean, independent, and dignified!

**Respectfully,
Chairman of the Board
PU “Ukrainian Wind
Energy Association”
Andriy Konechenkov**

A stylized, handwritten signature in blue ink, likely belonging to Andriy Konechenkov, is positioned to the right of the signature block.

I 1. INTRODUCTION



This Code serves as a set of guidelines for corporate ethics and business conduct for employees of the Secretariat of the PU “Ukrainian Wind Energy Association” (hereinafter referred to as “UWEA” or the “Association”), as well as for UWEA Members¹. It outlines the principles of professional behavior, mutual respect, transparency, responsibility, integrity, non-discrimination, information security, labor protection, environmental awareness, and sustainable development for representatives of the Secretariat and UWEA Members, in accordance with the Mission, Vision, and Corporate Values of UWEA. Every employee of the UWEA Secretariat and every UWEA Member is required to know, understand, and follow the provisions of this Code in their daily activities.

Adhering to the principles outlined in this Code aids in making decisions that comply with legislation support the industry’s

development goals, help prevent conflicts of interest, and protect the reputation of UWEA, its Members, and the entire industry.

UWEA also expects all its Partners² to share the values and principles outlined in this Code in their work. They should promote the creation of an honest, responsible, and sustainable business environment in Ukraine.

The UWEA Board is responsible for monitoring compliance with the Code. This includes preventing potential violations and quickly addressing any cases of non-compliance by employees of the Secretariat, Members, or Partners of the Association.

UWEA reserves the right to terminate or refuse cooperation with any employees of the UWEA Secretariat, UWEA Members, or Partners who do not adhere to the values of this Code or who violate its provisions.

¹ A UWEA Member is defined as a company that has obtained membership in the Association and adheres to its obligations as specified in the UWEA Charter, which includes members of the UWEA Board.

² A UWEA Partner includes companies, organizations, scientific institutions, and media outlets that have formalized their partnership intentions through a relevant Memorandum and fulfill the stipulated obligations

2. MISSION, VISION, OBJECTIVES AND VALUES



OUR MISSION

We facilitate the implementation of national and international strategies aimed at the large-scale deployment of wind energy technologies, energy storage systems, and distributed generation in Ukraine. Our goal is to integrate our country into the European energy space through active participation in shaping public policy, collaborating with international partners, raising public awareness, and promoting clean technologies among the population.

We are committed to ensuring that wind energy becomes a key tool for Ukraine's post-war recovery, energy independence, and climate neutrality.

OUR VISION

We are a public union and non-profit organization dedicated to promoting wind energy technologies and protecting the interests of the wind energy sector at both national and international levels. Our activities are centered around people, efficiency, and a rapid response to modern challenges, while prioritizing sustainability. We firmly believe that the accelerated deployment of wind energy is not only an economic necessity but also a moral obligation to future generations for a clean environment, sustainable development, and energy independence for Ukraine.

OUR VALUES

UWEA's activities are grounded in the following key values:

- **Responsibility.** We carry out our activities with the understanding that all our efforts must align with the interests of society, our member companies, and the state as a whole. We are accountable for the quality of our work, the use of membership fees, compliance with corporate standards, and the effective protection of both national and international investors' interests in the wind energy sector in Ukraine.

- **Professionalism.** The employees of the UWEA Secretariat and the members of UWEA Committees possess extensive knowledge and experience necessary to fulfill the Association's mission and objectives. They effectively promote the development of wind energy technologies in Ukraine, engage in high-quality and transparent interaction with state authorities, formulate legislative initiatives, defend the interests of renewable energy source (*RES*) investors, and implement best international practices. The Association's Board is composed solely of professionals in their respective fields—individuals who have dedicated a significant portion of their lives to the advancement of wind energy and the energy sector as a whole. Highly qualified representatives from UWEA members also participate actively in the decision-making processes of the Association.
- **Respect and integrity.** Our operations are grounded in respect for the employees of the UWEA Secretariat, UWEA Members and Partners, representatives of state authorities, communities, and all other stakeholders in the wind energy sector in Ukraine. We uphold the principles of ethics, originality, and transparency, maintaining a zero-tolerance policy towards any form of dishonesty or plagiarism.
- **Openness.** The UWEA is committed to open dialogue and all forms of cooperation. We provide our Members and Partners with transparent information about potential collaboration opportunities, fostering a platform for establishing effective business connections within the Association.
- **Striving for improvement.** We constantly develop our team, support their professional growth, encourage initiative, and aim to establish the UWEA as a center of expertise, innovation, and European standards in the renewable energy sector.

OUR OBJECTIVES

- To promote the large-scale development of the Ukrainian wind energy market and its integration into the European energy framework.
- To support the implementation of national energy policies and initiatives aimed at accelerating the deployment of wind energy and other clean technologies in Ukraine.
- To foster the development of Ukraine's innovative potential and to utilize and implement leading global wind energy technologies within the country.
- To encourage the growth of distributed energy generation in Ukraine, with a particular focus on territorial communities.
- To promote the development and implementation of energy storage systems in Ukraine.
- To attract both domestic and international investments into the wind energy sector of Ukraine.
- To identify legislative, administrative, and technical barriers that hinder the development of wind energy in Ukraine, and to initiate the preparation and implementation of solutions to eliminate these barriers.
- To popularize renewable energy, particularly wind energy, among the population.
- To enhance the educational environment and train future specialists in the wind energy sector.
- To provide objective, reliable, and professional information about the modern wind energy industry in Ukraine and globally.
- To support and develop close cooperation with global and European wind industry associations and organizations.

3. GENERAL RULES AND PRINCIPLES OF BUSINESS CONDUCT



The UWEA operates in accordance with Ukraine's legislation, as well as the country's international obligations. We are committed to upholding the principles of integrity, transparency, and responsibility. The UWEA fosters relationships with Secretariat employees and UWEA Members based on respect for human rights, non-discrimination, and the protection of personal dignity. We strive to create equal opportunities for everyone. Employees of the Secretariat and UWEA Members must share the Mission, Vision, Values, and Objectives of UWEA.

The Secretariat, Members, and Partners of the Association are expected to act transparently, avoiding deceit, misinformation, manipulation, or any form of dishonest behavior.

Relationships within UWEA's activities should be founded on respect, courtesy, goodwill, and acknowledgment of each person's contributions.

Discrimination based on gender, age, race, religion, political beliefs, disability, or social status is strictly prohibited.

Communication among the Secretariat, UWEA Members, Partners, state authorities, and international institutions must be conducted openly, while ensuring information security, confidentiality, and the interests of all parties are respected. The UWEA strictly prohibits any forms of fraud, corruption, information manipulation, document forgery, or the acquisition of improper benefits.

Violating these principles is incompatible with membership in the Association. All employees of the Secretariat, UWEA Members, and Partners are required to adhere to business ethics, exercise restraint, and maintain respect and goodwill in professional relationships. This includes public communications, participation in events, and representing the interests of the industry both in Ukraine and internationally.

4. ACTIVITIES IN THE LOBBYING SPHERE



The UWEA conducts its activities in accordance with the Law of Ukraine “On Lobbying” No. 3606-IX, dated February 23, 2024, and follows the Rules of Ethical Conduct for Lobbyists, which were approved by the Resolution of the Cabinet of Ministers of Ukraine No. 1128, dated October 1, 2024.

The UWEA will employ the following lobbying methods in its activities:

- engage in direct or indirect communication with the object of lobbying on matters related to the lobbying subject;
- prepare and distribute presentations, proposals, program and position documents, analytical materials, results of sociological and other research related to the subject of lobbying. This may include the use of media or the Internet;
- participate in events related to the lobbying subject with the aim of influencing (*attempting to influence*) the targeted parties;
- invite the object of lobbying to participate in meetings, conferences, events, etc.;
- organize public events, information campaigns, and other lawful activities that are related to the subject of lobbying;
- other methods not prohibited by law, which involve the lobbyist exerting influence (*attempting to exert influence*) on the object of lobbying with regard to the subject of lobbying.

5. UWEA'S OBLIGATIONS REGARDING LOBBYING

In the context of lobbying activities, both the Secretariat and UWEA Members are obliged to adhere to the ethical principles, rules of conduct, and avoid conflicts of interest.

To ensure transparency and prevent conflicts of interest and, the UWEA Board, approves and publicizes the key principles, initiatives, proposals, and positions of UWEA related to UWEA's lobbying efforts.

UWEA Members have the right to express their reservations to the Secretariat if they do not support a particular UWEA position.

Speeches made on behalf of UWEA must align with agreed-upon and publicized positions or follow specific speaking points that have been separately approved by the Secretariat.

If the position of UWEA differs from that of individual UWEA Members, UWEA will publicly communicate the corresponding reservation.

6. OBLIGATIONS OF UWEA MEMBERS REGARDING LOBBYING



Representatives of UWEA Members are required to:

- inform the UWEA Secretariat about any public positions and potential contacts with representatives of state authorities and local self-government where these representatives may express a viewpoint on behalf of UWEA;
- obtain the consent of the UWEA Secretariat regarding the topics of publications, speeches, positions, and messages that may be issued on behalf of UWEA. Additionally, they must inform the UWEA Secretariat about any related events that has taken place;
- communicate to public stakeholders any instances where the UWEA Member's position reflects their personal views or the views of specific companies they represent, especially if such positions do not align with the officially publicized stance of UWEA, and/or for which the consent of the UWEA Board was not granted.

7. RESOLVING THE CONFLICT OF INTEREST



To prevent conflicts of interest among UWEA Members and between the positions of individual Members and the Association, the following measures will be implemented:

- initiatives and proposals or other materials to be used or distributed in the lobbying process must be adopted by a majority vote in working groups or committees, with the option for of review by the UWEA Board;
- key principles, initiatives, proposals, and positions that represent the Association's stance on the issues being lobbied must be approved by the UWEA Board and published.

In the event of a conflict of interest, the following methods will be employed to resolve the conflict:

- submitting the decision on the matter causing the conflict of interest for consideration by the UWEA Board;
- publication of reservations regarding the stance of both UWEA and the UWEA Member;
- evaluating whether the UWEA Member's position is in alignment with the UWEA's values;
- considering implementing disciplinary measures to address UWEA members who have violated the rules outlined in this Code related to avoiding conflicts of interest, as well as other rules, obligations, and restrictions pertaining to UWEA's lobbying activities.

8. OBLIGATIONS OF THE SECRETARIAT AND UWEA MEMBERS



Employees of the Secretariat and UWEA Members agree to:

- focus their efforts on the maximum development of wind energy, energy storage systems, and renewable energy sources in Ukraine;
- respect human rights, freedoms, and dignity, while actively preventing any forms of discrimination;
- conduct their activities with honesty, transparency, and integrity, avoiding any fraudulent acts, and refraining from deceit, concealment, or manipulation of information;
- care for the environment and carry out their activities in accordance with the principles of sustainable development;
- foster open communication with state authorities, partners, and other market participants based on transparency, equality, and mutual respect;
- refrain from offering, promising, or providing any form of improper remuneration—whether monetary, material, or non-material—with the intent to gain individual advantages or privileges that are prohibited by the legislation of Ukraine;
- adhere to confidentiality rules and avoid disclosing, directly or indirectly, any information related to project activities, financial status, or professional activities of the UWEA or its members;
- respect intellectual property rights, avoid plagiarism, and not to use the work of others without proper citation or permission;
- prevent any intentional or unintentional harm to the reputation of the UWEA, its Members, and its Partners;
- avoid conflicts of interest, where personal interests may conflict with the Mission, Values, and Objectives of UWEA; Here, “Personal interests” refers to both the financial and personal interests of the Secretariat’s employees and UWEA Members;
- take all possible measures to ensure labor protection and safety while performing official duties;
- conduct activities in accordance with the current legislation of Ukraine;
- adhere to the provisions of this Code and report violations to the UWEA Board.

9. CODE VIOLATION: REVIEW PROCEDURE AND SANCTIONS

PROCEDURE FOR REVIEWING BREACH OF THE CODE

If an UWEA Member or an employee of the UWEA Secretariat becomes aware of a violation of this Code by anyone – be it another Secretariat employee, a UWEA member, or a UWEA Partner – they must report it. Additionally, if they have reason to believe that the UWEA Board or the management of any UWEA member or partner is involved in a violation of this Code, they are required to report it to the Chairman of the UWEA Board. The Chairman of the UWEA Board is responsible for overseeing business conduct and ethics matters.

In any case of reported violation, UWEA must ensure that a complete, thorough, and unbiased investigation is conducted. Upon receiving a report of a Code violation, the Chairman of the UWEA Board must inform the UWEA Board. Additionally, the Chairman may meet personally with the whistleblower to gather further details about the issue. After the fact-finding stage, the UWEA Board may hold a special meeting with the employee of the Secretariat, a UWEA Member, or a UWEA Partner whom there is information about regarding a potential violation of this Code to clarify the facts and gather explanations. Following this, the UWEA Board shall issue a decision within a reasonable timeframe regarding whether a violation of this Code has occurred by the relevant employee, Member, or Partner. The individual about whom the violation information is being reviewed will be excluded from all stages of the review and decision-making process related to the report.

The procedure for reviewing a report of a Code violation against the Chairman of the UWEA Board is the same as for employees of the Secretariat, Members, and Partners of the Association. However, the review of such a report shall be conducted by the Deputy Chairman of the Board.

SANCTIONS FOR VIOLATING THE CODE

In the event of a violation of this Code, disciplinary measures provided for by the current labor legislation of Ukraine may be applied to an employee of the UWEA Secretariat. In the event of a violation of this Code by a UWEA Member, measures of influence provided for by the UWEA Charter may be applied to them. In the event of a violation of this Code by a UWEA Partner, a decision may be made to terminate the partnership relations.

If an employee of the UWEA Secretariat violates this Code, disciplinary measures as outlined in the current labor legislation of Ukraine may be imposed. In cases where a UWEA Member violates this Code, appropriate disciplinary actions stipulated by the UWEA Charter may be enforced.

For violations committed by a UWEA Partner, the UWEA may decide to terminate the partnership. Any decision to impose disciplinary measures must be documented in writing by the UWEA Board. This document should include the date, the signature of the Chairman of the Board or their deputy, a brief summary of the incident, a reference to the specific violation of the Code, and the rationale for such action.

ADOPTION AND REVISION OF THE CODE

This Code was adopted at the UWEA Board meeting on October 21, 2025. It may be reviewed upon request by any member of the UWEA Board during a regular meeting.



UWEA UKRAINIAN
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ASSOCIATION

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