



Albireo Energy Code of Conduct Policy Statement

The purpose of this public policy statement is to express Albireo Energy's commitment to operating ethically, and to explain our Code of Conduct, employee training, and related policies.

Albireo Energy is a leading independent building controls and energy services provider recognized by customers for creating intelligent, high-performance buildings. We help building owners and their teams make decisions about building automation that achieves operating performance, decarbonization and sustainability goals.

About Our Code of Conduct

Albireo Energy and its subsidiaries (the "Company") are committed to conducting business with integrity, transparency, and respect for all stakeholders. Our Code of Conduct (Code) is an essential component of our strategic plan with principles outlined to assist and guide all Company employees in pursuits and efforts on behalf of the company. The Code works in conjunction with our Employee Handbook and all relevant policies and procedures, and is supplemented by our Code of Conduct for Third Parties. These policies ensure a positive workplace culture and fosters trust within our organization, with our customers, and the communities we serve.

Our Code is available to all Albireo Energy employees through our shared folder structure. It is embedded into our Learning Management System where new leaders and employees are required to review and certify when onboarding. All Albireo Energy leaders and employees are required to review and recertify annually.

Our Code includes the following elements:

- Equal Employment Opportunities
- Harassment
- Workplace Violence
- Alcohol and Illegal Drugs
- Employee Health and Safety
- Protecting Personal Information
- Product Safety
- Fair Dealing and Fair Competition
- Human Rights
- Confidential and Proprietary Information
- Intellectual Property
- Conflicts of Interest
- Fraud
- Gifts, Entertainment and Travel
- Compliance with Laws and Policies
- Money Laundering, Bribery and Corruption
- Political and Charitable Contributions
- Import and Export Laws

As a supplement to the Code, we have specific policies on Anti-Bribery and Anti-Corruption, Anti-Trust, and Human Rights.

Employee Training

As part of certifying the Code of Conduct, we require leaders and employees to complete annual training on topics domain to our Code. Training is conducted and completion tracked through our Learning Management System. Topics include:



- Anti-trust
- Anti-money laundering
- Anti-corruption
- Anti-harassment
- Bribery
- Ethical Behavior
- Reporting
- Gifts and Goodwill
- Conflicts of Interest
- Fair Competition
- Treatment of Company Assets
- Confidentiality / Sensitive Information
- Technology and Internet Usage
- Entertainment
- Workplace Violence

A supplemental and comprehensive data privacy and cybersecurity training curriculum is also mandatory for all leaders and employees. Specifics are outlined in our Data Privacy Public Policy.

Reporting and Response

Reporting: Leaders and employees may report compliance concerns to their managers, directly to the CEO or Chief Human Resources Officer (CHRO), or through the Ethics Helpline. The Employee Ethics/Helpline is a secure resource that is hosted and staffed by Lighthouse/Syntrio, an independent reporting service that can take calls in most languages and is available toll-free 24 hours a day, seven days a week. Reports to the Employee Ethics/Helpline are submitted to the CHRO for disposition.

Reports to management or to the Employee Helpline may be made on a named basis or anonymously in jurisdictions (including the U.S.) where allowed by law. As it may be more difficult to thoroughly investigate anonymous reports, we encourage (but do not require) those reporting concerns to identify themselves.

Non-Retaliation: We prohibit and do not tolerate unlawful retaliation for raising questions or concerns or reporting actual or suspected violations, participating in or cooperating with an investigation, or refusing to participate in any violation of applicable law. We will not discharge, demote, suspend, discipline or otherwise treat adversely in any manner any employee who, in good faith, raises compliance questions or concerns or reports actual or suspected violations, even if we determine that there has been no violation. Anyone who retaliates in any way, directly or indirectly, or encourages others to retaliate against a “whistleblower” is subject to disciplinary action, up to and including termination. Further details are outlined in our Code of Conduct.

Response and Remedy: Our executive leadership team confidentially investigates and resolves allegations of misconduct, including known or suspected violations of our Code of Conduct, internal policies, the law and other forms of misconduct.

Oversight Responsibilities: Oversight of the Code is a shared responsibility across all levels of Albireo Energy to ensure ethical behavior and accountability.

Leadership and Management are responsible for setting the tone, promoting a culture of integrity, and ensuring employees understand and follow the Code.

Human Resources and Compliance provide guidance, training, and support, and oversee the review and resolution of reported concerns.



Employees are expected to uphold the Code, act with integrity, and report any suspected violations.

The Code of Conduct is reviewed and updated annually by the Chairman and CEO, CFO (Compliance), and CHRO to ensure it remains relevant and effective. Violations may result in disciplinary action, up to and including termination.