



Non-Discrimination / Anti-Harassment Policy Statement

The purpose of this public policy statement is to express Albireo Energy's commitment to providing a work environment free from discrimination and harassment on the basis of any applicable legally protected classification, such as race or sex. These policies apply to all employees of Albireo Energy and its subsidiaries, both inside and outside of Albireo Energy's premises.

This policy is a standing part of our Employee Handbook which is reviewed and updated annually by our Chief Human Resources Officer (CHRO) with approval from the Chairman and CEO.

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 achieve operating performance, decarbonization and sustainability goals.

We do not tolerate any illegal discrimination, harassment, or retaliation by or against any employee, contractor, customer, vendor, or anyone else doing business.

Prohibited Discrimination / Harassment

(a) Discrimination

As an Equal Opportunity Employer, Albireo Energy does not discriminate on the basis of actual or perceived race (including, traits historically associated with race, including but not limited to, hair texture and protective hairstyles), color, religion, gender or sex (including pregnancy, childbirth, or related medical conditions), national origin or ethnicity, physical or mental disability, genetic information, age, military status, citizenship or immigration status, marital or partnership status, sexual orientation, sexual and reproductive health decisions, gender identity or expression, refusal to submit to genetic tests or make genetic tests available, ancestry, creed, civil union status, atypical hereditary cellular or blood trait, familial status, height, weight, status as a victim of domestic violence, transgender or intersex status, caregiver status, or any other characteristic protected by applicable federal, state, or local laws.

This nondiscrimination policy applies to all terms, privileges and conditions of employment, including, but not limited to, compensation, hours, recruitment, selection, training, assignment, evaluation, promotion, discipline and termination. If you believe a violation of this policy has occurred, a timely complaint should be made in accordance with this policy. Any discriminatory treatment, harassment or retaliation directed at any employee on the basis of a protected characteristic in violation of this policy is expressly forbidden.



(b) Harassment

It is Albireo Energy's policy to prohibit harassment with regard to actual or perceived race (including, traits historically associated with race, including but not limited to, hair texture and protective hairstyles), color, religion, gender or sex (including pregnancy, childbirth, or related medical conditions), national origin or ethnicity, physical or mental disability, genetic information, age, military status, citizenship or immigration status, marital or partnership status, sexual orientation, sexual and reproductive health decisions, gender identity or expression, refusal to submit to genetic tests or make genetic tests available, ancestry, creed, civil union status, atypical hereditary cellular or blood trait, familial status, height, weight, status as a victim of domestic violence, transgender or intersex status, caregiver status, or any other characteristic protected by applicable federal, state, or local laws. This prohibition applies to all job applicants, contractors, interns, volunteers or employees by another employee, supervisor, vendor, customer or any third party on the basis of a protected characteristic. Such conduct will not be tolerated by the Company.

Harassment is generally defined as unwelcome conduct based on a person's characteristic that has the purpose or effect of creating an intimidating, hostile, or offensive environment, unreasonably interfering with an individual's work performance, or adversely affecting an individual's opportunities.

Sexual harassment is one form of prohibited conduct that includes unwelcome sexual or other advances, requests for sexual or other unwelcome favors, and other unwelcome verbal, non-verbal, or physical conduct. Sexual and other harassment may occur between two or more members of an employee's own sex or any other protected classification. Harassment may occur where:

- Submission to or rejection of such conduct is made, either explicitly or implicitly, a term, privilege or condition of an individual's employment; or
- Submission to or rejection of such conduct by an individual is used as a basis for any decision affecting that individual; or
- Such conduct has the purpose or effect of interfering with an individual's work performance;
- Such conduct creates an intimidating, hostile or offensive environment; or
- A person is offered, promised or granted favored treatment as a result of that person engaging in, or agreeing to engage in, unwelcome sexual or other prohibited conduct; or
- A person is threatened with, or subjected to, unfavorable treatment as a result of that person's refusal to engage in unwelcome sexual or other prohibited conduct.

Examples of improper conduct which may constitute harassment, whether intentional, inadvertent, in jest or otherwise, may include:

- **Verbal Harassment** – abusive language, profanity, derogatory comments, demeaning jokes, slurs, sexual or other flirtations, unwelcome propositions, teasing, or bullying.



- **Physical Harassment** – assault, intimidation, physical or other interference with normal work or movement, or unwelcome touching.
- **Visual Harassment** – displays of demeaning posters, viewing or displaying inappropriate Internet sites (i.e., “Not Safe For Work” content), cards, cartoons, jokes, emails, graffiti, gestures, drawings, or suggestive pictures.

Harassment can take many forms, and a complete list of prohibited conduct cannot be set forth in this policy. A good piece of advice is this: If there is any question that you are about to engage in offensively inappropriate behavior, do not do it.

Duty To Report

If you experience or witness any unlawful harassment, discrimination or retaliation, whether against any employee, contractor, customer, vendor or other visitor or business partner of the Company, you must report the situation immediately and completely to your manager and Human Resources. If the situation involves your manager or Human Resources, we have an independent third-party hotline service to make the report. The hotline can be contacted by the following means:

Toll-Free Telephone:

- English speaking USA and Canada: (844) 490-0002
- Spanish speaking USA and Canada: (800) 216-1288
- French speaking Canada: (855) 725-0002
- Contact Human Resources if you need a toll-free # for North American callers speaking languages other than English, Spanish, or French.
- Website: www.lighthouse-services.com/albireoenergy
- Email: reports@lighthouse-services.com (you must identify Albireo Energy in your email report)
- Do not allow an instance of unlawful discrimination, harassment, or retaliation continue by failing to report it; regardless of who is creating the situation.

Investigation Procedures

Once a report is made, we will immediately investigate and, where appropriate, take prompt remedial action. An investigation will be kept as confidential as is practicable under the circumstances and may include interviews with witnesses and other procedures to collect evidence and resolve the situation.

Retaliation Prohibited

We prohibit retaliation against anyone who makes a report or participates in an investigation of harassment, discrimination, or retaliation.

Disciplinary Action

Anyone who violates this policy is subject to disciplinary action, up to and including termination for the first instance. We similarly will take remedial action against any contractor, customer, vendor, or other visitor to our premises who violate this policy.