



# Sustainable Procurement Policy



**Document manager:** Procurement & Contract Manager  
**Approved by:** Board of Directors  
**Date of approval:** 10 May 2023

## 1. Purpose

The purpose of the Sustainable Procurement policy is to set guidelines and rules for how the Eolus group of companies ("Eolus") works to make our operations more sustainable through our procurement activities. The overall view is that sustainability requirements shall be incorporated into all procurement processes that Eolus enters into.

## 2. Policy statement

Eolus shall apply a high level of business ethics and all procurement processes shall ensure objectivity, a holistic view and fair competition. Employees shall aim to create and secure synergies in each procurement process and actively work to ensure an efficient and sustainable use of economic and natural resources.

The procurement of materials, products and services shall be based on clear guidelines that integrate environmental, social and governance (ESG) requirements. All contracts shall be in writing, and Eolus shall primarily purchase from suppliers where the company has existing framework agreements. Eolus' suppliers are expected to follow internationally recognized principles for environment, labour conditions, human rights, and anti-corruption. This means striving to achieve the highest standards in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs), the Organisation for Economic Co-operation and Development (OECD) guidelines for multinational enterprises, the International Labour Organizations (ILO's) eight core conventions, the Sustainable Development Goals (SDGs) and the ten principles of UN Global Compact. Risks in the supply chain shall, when deemed necessary, be minimised by regular follow-ups on suppliers' sustainability work and plan.

### **Our sustainable procurement criteria:**

Eolus has signed the United Nation's Global Compact and has thereby committed to its ten principles on human rights, labour, environment, and anti-corruption. Eolus aims to promote these principles by engaging in a constructive dialogue with our business partners and counterparties in our supply chain. We require our business partners and suppliers to follow the requirements set in our "Code of Conduct for Suppliers and Business Partners". Our business partners and suppliers must always adhere to all national laws and regulations. In the event of conflict between national laws and regulations and the principles in this policy, national laws and regulations take precedence.

In practical terms, we strive to advance our procurement process and integrate ESG-requirements by evaluating our suppliers and their performance in relation to the following.

- Respect of Human Rights (e.g., avoidance of discrimination, protection of vulnerable groups).
- Consideration of labour conditions (notably health and safety conditions).
- Contributing to community involvement and development (fostering employment and access to services, respecting local cultures and practices).
- Aim to minimize impacts on the environment (in terms of resource use and a life-cycle perspective, greenhouse gas-emissions, protection of biodiversity and combating climate change).
- Adhering to ethical business practices (notably anti-corruption, fair competition).

### 3. Relevant Entity

This policy applies to all entities within Eolus.

### 4. Roles and Responsibilities

Eolus Procurement & Contract Manager is responsible for this policy. The policy is approved by the Board of Directors and reviewed annually.

### 5. Exceptions

Any need for exceptions to this policy shall be well documented and reviewed, approved by the CEO, and reported to the Board of Directors.

### 6. Monitoring of Compliance

Non-compliance with this policy shall be reported via Eolus system for deviations, where the responsible function follows up.

### 7. Reference list

In the creation of this policy, the following references have been used:

1. The UN Guiding Principles on Business and Human Rights [https://www.ohchr.org/sites/default/files/Documents/Issues/Business/Intro\\_Guiding\\_PrinciplesBusinessHR.pdf](https://www.ohchr.org/sites/default/files/Documents/Issues/Business/Intro_Guiding_PrinciplesBusinessHR.pdf)
2. OECD Guidelines for Multinational Enterprises <https://www.oecd.org/daf/inv/mne/48004323.pdf>
3. International Labour Organization, specifically the following documents (<https://ilo.org>):
  - Forced Labour Convention 1930 (C.29)
  - Freedom of Association and Protection of the Right to Organise Convention 1948 (C.87)
  - Right to Organise and Collective Bargaining Convention 1949 (C.98)
  - Equal Remuneration Convention 1951 (C.100)
  - Abolition of Forced Labour 1957 (C.105)
  - Discrimination (Employment and Occupation) Convention 1958 (C.111)
  - Minimum Age Convention 1973 (C.138)
  - Worst Forms of Child Labour Convention 1999 (C.182)
4. UN Sustainable Development Goals <https://www.un.org/sustainabledevelopment/>
5. 2030 Agenda for Sustainable Development <https://sustainabledevelopment.un.org/post2015/transformingourworld/publication>
6. UN Global Compact <https://unglobalcompact.org/>
7. Eolus Code of Conduct [https://www.eolusvind.com/wp-content/uploads/2022/05/2022\\_Code\\_of\\_Conduct\\_Eolus.pdf](https://www.eolusvind.com/wp-content/uploads/2022/05/2022_Code_of_Conduct_Eolus.pdf)
8. Eolus Human Rights Policy [https://www.eolusvind.com/wp-content/uploads/2023/02/2022\\_HUMAN\\_RIGHTS\\_POLICY.pdf](https://www.eolusvind.com/wp-content/uploads/2023/02/2022_HUMAN_RIGHTS_POLICY.pdf)