

WINDEUROPE CONFIDENTIALITY POLICY

for the members of the Board and the Management Committee

This Policy applies to the Directors of the Management Committee (“MC”) and their permanent representatives and to the members of the Board. People serving on any of these governance bodies as well as the organizations they represent are bound by this policy.

As a reminder:

- Directors of the MC are companies or associations: they are represented at the meetings of the MC by their permanent representative;
- Members of the Board are individuals who have the title of Group Chief Executive Officer or N-1, and they are appointed by each Leading Member and Market Leader on the MC.

Directors, permanent representatives and/or members of the Board are, under Belgian corporate law and WindEurope’s governance rules, subject to a duty of discretion and loyalty towards the Association and they may not disclose, use for personal or third-party benefit or divulge without authorization the content of the discussions and the documents that are shared during the meetings of these bodies.

However, as permanent representatives or CEOs of their respective companies, the persons participating in the meetings of these bodies, are allowed to share information within their respective companies, within the limits set out in this Policy and in compliance with Belgian law.

Confidential information

Participants at MC and Board meetings must keep Confidential Information, as defined below, strictly confidential and must not disclose, communicate, share or otherwise make it available to any third party, except as expressly permitted under this Policy.

Confidential Information covers:

- i. any non-public information or documentation relating to WindEurope or its activities that is shared during the meetings of the MC or the Board; and
- ii. any information, even if public, whose disclosure to third parties may, in the given circumstances, be prejudicial to the interests, activities or reputation of the association.

Confidential Information includes, without limitation:

- i. MC and Board agendas, papers, presentations and supporting documents;
- ii. draft and final MC and Board minutes;
- iii. discussions held during MC or Board meetings and any information disclosed during such discussions;
- iv. WindEurope’s strategic, regulatory or negotiating positions;
- v. information concerning current or prospective members, membership applications, membership discussions or membership assessments;
- vi. any information expressly marked as confidential, or which should reasonably be understood to be confidential having regard to its nature and the circumstances in which it was disclosed;

- vii. any external legal advice; and
- viii. notes, summaries, analyses, extracts, copies or other materials prepared by or for a member of the MC or the Board which reproduce, contain or are based on Confidential Information.

Permitted disclosure

Participants in the meetings of the MC and the Board may disclose Confidential Information to the boards of their respective organizations in as far as such disclosure is necessary for the exercise of their mandate.

Disclosure of Confidential Information from the participants to the Board or MC's meetings to other persons working for their respective organizations is allowed only where necessary for the exercise of their mandate, and only to persons with a genuine need to know who have been made aware of the terms of this Policy or are themselves bound by an equivalent duty of confidentiality, whether by law or under an equivalent confidentiality undertaking.

No further internal disclosure

Membership of the MC or the Board does not give the members' organisation, its own members, shareholders, affiliates, constituent bodies, employees, contractors, agents or consultants any automatic right to access Confidential Information.

Organizations represented on the MC or the Board must ensure that Confidential Information obtained by virtue of their governance role within WindEurope is not passed on within their own shareholding, membership, affiliate structure, or wider organisation, and must apply heightened safeguards where any part of that structure includes entities that may not themselves align with WindEurope's Activities and Objectives, as further detailed in the Narratives or Core Principles.

Interaction with competitively sensitive information

This Policy applies in addition to, and does not replace, the restrictions on competitively sensitive information set out in the WindEurope Competition Compliance Policy.

Sanctions

Permanent representatives, Directors, and members of the Board are liable for any damage caused to WindEurope and/or third parties because of the breach of their obligations under this Policy.

The principles governing the liability of Directors of the MC and their permanent representatives are set out in the *WindEurope Guidelines and Policies 3.4. – Management Committee Guidelines for Directors*, Section 4 (Liability of Directors), and on the liability of Board members in the *WindEurope Guidelines and Policies 3.3. – Board Governance Guidelines for Board Members*, Section 4 (Liability of Board members).