



CODE OF CONDUCT



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Preamble

This Code of Conduct presents the values on which Waga Energy is founded. It provides guiding principles and specifies the rules that everyone must apply daily. The Code also indicates the resources and contacts available to help and support you in making the right choices.

Although the Code is intended to apply universally to all Waga Energy employees, regardless of their role or seniority, it does not cover all potential circumstances or anticipate every possible issue. Therefore, we must act in the spirit of our Code and in alignment with our values. You must seek assistance from subject matter experts within Waga Energy whenever you have questions or concerns.

No gain or business success—regardless of its size—is acceptable or valid if it comes at the expense of our integrity or ethics.

Ethics is the guiding thread of our activities. It supports our long-term industrial vision. This begins with applying the company's values.

Before presenting the founding values of Waga Energy, which are translated into operational principles, one prerequisite must be mentioned—a fundamental pillar: commitment. The founders, as well as Waga Energy employees, are not only aware of environmental and energy-related challenges; they have deliberately chosen to commit themselves—at least professionally—to action, contributing to the construction of a society that is more respectful of the environment. This commitment is long-term, aligned with sustainable development.

- **Cooperation:** We move forward together by sharing our expertise and learning from one another. Humility, excellence, and sharing are the keys to creating collective value.
- **Mastery:** We design and operate reliable and high-performance solutions. Technical and operational mastery ensures the safety, efficiency, and longevity of our projects.
- **Boldness:** We believe that it is possible to change the world by developing sustainable energy solutions. Boldness drives innovation and fuels enthusiasm to turn our ideas into action.

The Code and its content also apply to our relationships with customers, suppliers, business intermediaries, and anyone we interact with in our professional environment (“third parties”).

Please read our Code carefully, as it has been designed to reflect the evolution of Waga Energy and our needs. This Code may serve as a guide to help you make the right decisions.



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We ask you to acknowledge that you have read, understood, and agreed to comply with the Code of Conduct.

We are counting on each of you.

Sincerely,

The Executive Committee

Signé par : <i>Guénaél PRINCE</i> E8872F2F5EA3446...	Signé par : <i>Mathieu Lefebvre</i> 8DDB778DCB33400...
Signé par : <i>Jean-Michel TABARUS</i> 35C860CDEA2C4A5...	Signé par : <i>PAGET</i> C26041880EDB4D5...



1. WAGA ENERGY CODE OF CONDUCT

a. Purpose of our Code

Our Code serves as support for all of our company's activities. It shows us how to act with the highest integrity in our interactions with stakeholders—our colleagues, clients, suppliers, business partners, consultants, directors, shareholders, government agencies, and local communities.

By following our Code in our interactions with these stakeholders, we help ensure the success of our company and limit its legal and business risks.

Our Code is also a guide to ethical principles and business conduct at Waga Energy. It outlines the behaviors expected of everyone, helps us make ethical decisions, and shows how to identify potential misconduct.

It also explains what to do when we have questions or wish to raise a concern.

b. Scope of our Code

Our Code applies to all our professional activities across the entire Waga Energy Group, including directors, management, and employees, regardless of location.

We also expect our consultants, suppliers, distributors, and other business partners to adhere to these principles when working on behalf of Waga Energy or on our premises.

2. ADMINISTRATION OF THE CODE

a. Acknowledgment of the Code by employees

The Code is given to Waga Energy employees when they join the Group. Employees, the Executive Management and the directors are obliged to acknowledge that they have read and understood the Code and that they comply with it.

b. Publication and revision of the Code

The Code is periodically reviewed by the Human Resources Department and the Legal & Compliance Department to update it as necessary due to legislative changes or shifts in the business environment. The content of the Code and each of its revisions are approved by the Executive Committee.

c. Consequences of Code violations

You are required to comply with the Code, our internal policies, and the law in connection with your activities at Waga Energy.



Violations of the Code, policies, or applicable law may result in:

- Disciplinary action, up to and including termination of employment.
- In cases involving legal violations, civil and/or criminal penalties imposed by the relevant authorities.

Our Code is not an employment contract. It does not grant any specific employment rights nor guarantee employment for a particular duration.

3. OUR RESPONSIBILITIES

a. Respect for human rights

Working conditions must not undermine human dignity or any other fundamental individual rights as defined and protected by the United Nations Universal Declaration of Human Rights, the fundamental principles of the International Labour Organization, and the United Nations Global Compact, whose 10 principles Waga Energy adheres to.

Respect for human rights plays an increasingly important role in our business activities, and respect for individuals is one of our core values.

With regard to the respect for human rights :

- Each subsidiary and each Waga Energy employee must uphold and respect internationally proclaimed Human Rights and ensure they are not complicit in violations.
- Anyone who chooses to join Waga Energy does so freely; fair and favorable working conditions are provided to all employees.

Waga Energy is committed to treating its employees with dignity and respect. This means treating one another fairly and respecting all applicable employment and working-condition laws.

Waga Energy prohibits child labor and forced or compulsory labor, which refers to any work or service demanded from a person under the threat of any penalty and for which they have not offered themselves voluntarily.

b. Compliance with laws

Given the international scope of our activities, it is essential that we understand and follow all applicable international and local legal requirements. Laws and regulations are complex and subject to change.

This Code establishes the internal standards and policies we must follow everywhere. In some cases, this means we must act according to standards higher than those legally



required in the places where we operate. Conversely, any local standard that is more stringent than the guidelines of this Code must always be applied.

If you have doubts about the legality or appropriateness of a decision or business action, you must seek advice by following the steps described in Section 4, “Seeking advice and reporting incidents.”

c. Obligations of executives and managers

Executives and managers at Waga Energy have additional responsibilities that go beyond those shared by all employees. If you are a leader or manager, you must lead by example and serve as an ethical role model. This means knowing our Code so you can effectively communicate its guidance to your teams.

You are also responsible for creating a positive work environment where employees feel comfortable asking questions and raising concerns.

You must never ignore misconduct or unethical behavior, even if it occurs outside your area of responsibility or expertise. If an employee reports a potential unethical situation, you must address it appropriately, which may require contacting the Legal & Compliance team (see Section 4, “Seeking advice and reporting incidents”).

Each executive and manager is responsible for maintaining a workplace free from discrimination, including harassment. This responsibility includes:

- Discussing the Procedure for reporting and dealing with acts of moral, sexual and sexist harassment with team members;
- Encouraging employees to report any appearance of discrimination, harassment, or violence;
- Demonstrating that all employees are treated with dignity and respect.

You must never retaliate (or allow anyone else to retaliate) against a person who reports a concern in good faith regarding actual or suspected misconduct. Leaders and managers who permit retaliation will face disciplinary measures.

4. SEEKING ADVICE AND REPORTING INCIDENTS

a. Seeking advice

At times, you may find yourself facing an ethical dilemma where you are unsure of the right course of action. If you have questions or doubts about whether an action complies with our Code or internal policies, you must seek advice.

As a first step, we encourage you to speak with your manager for assistance.

Human Resources and the Legal & Compliance departments are also responsible for supporting you and providing information regarding questions about the application of this Code.

b. Internal reporting procedure to report incidents

We expect everyone to protect Waga Energy's reputation by speaking up when they become aware of unethical behavior. You are required to report any known or suspected violation of our Code, internal procedures, or applicable laws and regulations.

We also encourage all external stakeholders (shareholders, contractors, subcontractors, external employees, clients, suppliers) who witness potential compliance violations in the context of our business operations to speak up and raise their concerns using our dedicated reporting channels.

A procedure for collecting and handling reports provides guidance on the reporting mechanisms in place and on the investigation process. It is available under the "Ethics Reporting Portal" tab of the intranet page : [Welcome to the Ethical Alert Portal of WAGA ENERGY](#) (Organisation profile / Ressources/ Whistleblowing procedure).

A report may be submitted confidentially or anonymously via the following email address : compliance@waga-energy.com or via the ethics reporting portal: <https://waga.energy.alertcenter-ikarian.eu/>

Waga Energy prohibits retaliation against anyone who raises a concern in good faith or participates in an investigation following a report. Making a report "in good faith" means providing all available information honestly and impartially, whether or not the concern is ultimately confirmed.

Any employee who attempts to retaliate against a colleague (or who becomes aware of retaliation and does not report it appropriately) will be subject to disciplinary measures, up to and including termination. If you believe you have been the victim or witness of retaliation, you must report it promptly.

Refer to the **Whistleblowing Procedure** which provides further details and outlines the steps to follow when making a report.



c. Questions and answers

What should I do if my manager asks me to perform a task that I believe may violate the Code of Conduct or a law?

You may express your concerns and observations to your manager. If you are not satisfied with the response, or if the situation makes you uncomfortable, report your concern using the procedures described in “Seeking advice and reporting incidents.” You must never knowingly violate the Code, a procedure, or a law simply because a superior instructs you to do so or because you failed to ask for guidance.

How do I know when I should seek advice?

If something does not seem right, it may not be the right thing to do. Ask yourself:

- Am I sure this action is legal? Is it consistent with our Code and our procedures?
- Could this action be considered unethical?
- Could this harm Waga Energy’s reputation or put the company at risk? Make our company lose credibility?
- Could this action harm others (employees, clients, suppliers, investors)?

If you are unsure of any answer, you must seek advice to ensure you make the right decision.

Who is Waga Energy’s Compliance Officer and how can we contact him/her?

The Compliance Officer function is held by the Legal & Compliance Department, which can be contacted at: compliance@waga-energy.com

5. RESPECT AND SAFETY IN THE WORKPLACE

a. Diversity and commitment

We must respect the diversity, differences, talents, and abilities of others.

Diversity refers to all the unique characteristics each of us possesses: personality, lifestyle, professional experience, ethnicity, race, color, religion, sexual orientation or identity, marital status, age, nationality, disability, or other differences.

We strive to attract, develop, and retain talent that is as diverse as the markets we serve. This helps ensure an open, tolerant, and more effective work environment, where everyone’s different strengths and abilities are valued and respected.

To maintain a diverse workplace, we must ensure it is free from all forms of discrimination, particularly those based on origin, sex, age, family situation, religion, beliefs, disability, or sexual orientation. This means that all employment, promotion, and compensation decisions must be based on merit, skills, and qualifications.



Waga Energy is committed to treating candidates and employees fairly, complying with all applicable employment and working-condition laws, and promoting an environment where diversity is valued.

We each play a key role in creating a workplace where everyone feels respected, recognized, and free to contribute fully without fear of discriminatory behavior.

We all have the right to join a union or association. We also have the right to freedom of assembly and association, as well as collective bargaining. No one will be forced to belong to an association or a union.

We promote diversity and commitment when we:

- Respect the various talents, abilities, and experiences of each individual;
- Value the contributions of others;
- Foster a climate of trust, openness, and honesty.

b. Respect for the environment

Natural resources are essential for maintaining and developing economic activity, yet they are not unlimited. Their rational use is key to reducing our environmental footprint and limiting negative environmental impact. Respecting the environment in which our companies operate is fundamental.

Reducing our own environmental impact is a key challenge for the Group. By reducing its greenhouse gas (GHG) emissions, the Group can lower the carbon content of the biomethane it produces and develop environmentally responsible projects.

In carrying out our activities, each of us must respect and protect the environment—by using natural resources responsibly and reducing our carbon footprint. An environmental risk-management system has been implemented to identify and control the impacts of our activities, products, and services.

You must also contribute actively to the ISO 14001 environmental management system implemented by Waga Energy by complying with procedures and participating in actions aimed at reducing our environmental impact.

c. Health and safety

Waga Energy ensures that its employees work under conditions that protect their health and safety, and that appropriate policies are implemented and monitored.

Our health and safety policies and procedures are designed to help you work safely. Mandatory safety training must also be completed depending on the position held.

Safety is everyone's responsibility. You must insist that every task is carried out safely—regardless of your role—by reporting and actively helping to resolve situations such as:



- Being asked to perform a task you consider dangerous or for which you are not properly trained;
- Seeing someone perform a task you believe is dangerous or for which they are not trained;
- Suspecting that equipment is malfunctioning and may be dangerous;
- Observing or being informed of a hazardous situation or danger to yourself or others.

Each employee is responsible for using the required personal protective equipment and reporting any breaches or violations to the QHSE Department (Quality, Health, Safety & Environment).

d. Drugs et alcohol

To ensure workplace safety—both for ourselves and for others—we must all be free from the influence of alcohol, drugs, or misused medication while performing activities on behalf of Waga Energy. In addition, possessing, using, selling, offering, or distributing illegal drugs or substances on Waga Energy premises or during work-related activities is prohibited.

The only exception is the moderate consumption of alcohol during business dinners or events authorized by the Group.

Therefore, it is prohibited to:

- Work under the influence of alcohol, drugs, or illegal substances on or off Waga Energy premises;
- Possess, sell, use, transfer, or distribute illegal drugs or substances while working.

Violations of these rules pose safety risks and will be considered serious misconduct.

e. Violence prevention

Our commitment to workplace safety also means that Waga Energy has zero tolerance for acts or threats of violence.

If, during your work, you witness a violent or potentially violent situation—or become aware of such a situation—you must immediately report it to your manager and Human Resources.

Waga Energy applies a zero-tolerance policy for workplace violence. You are prohibited from committing any act that could cause another person to feel threatened or unsafe. This includes verbal aggression, threats, or any expression of hostility, intimidation, or aggression.

Waga Energy also prohibits the possession of weapons in the workplace, including in company parking areas and facilities.

Zero tolerance for violence applies to any behavior occurring in any work setting—whether on Waga Energy premises or outside.

f. Harassment

Waga Energy prohibits all forms of harassment, whether moral or sexual. Employees must ensure the workplace remains free from any type of harassment. No employee should be subjected to harassment.

Harassment includes any unwelcome, degrading, or hostile behavior—physical, verbal, or visual—based on origin, gender, race, disability, sexual orientation, gender identity, or age.

Harassment generally includes any form of inappropriate behavior towards another person that intentionally or unintentionally creates an intimidating, hostile, or offensive work environment.

Although legal definitions vary by country, Waga Energy will never tolerate any form of harassment.

The Group has adopted a Procedure for reporting and dealing with acts of moral, sexual and sexist harassment, implemented within each subsidiary, which aims to:

- Prevent and eliminate harassment in all work-related situations;
- Engage and hold all company stakeholders accountable in the prevention of harassment;
- Provide victims with the means to seek information and support;
- Inform victims about the procedure for handling their situation.

Any person who believes they are a victim of harassment may contact the company's designated harassment representative or the Compliance Officer via the whistleblowing portal.

Waga Energy investigates, reports and takes appropriate corrective measures. No retaliation will be tolerated following a report.

Refer to the **Procedure for reporting and dealing with acts of moral, sexual and sexist harassment**, which provides further details and specifies the appropriate course of action in a situation of harassment.



6. BUSINESS ETHICS

a. Conflicts of interest

A conflict of interest arises when our personal interests or those of our relatives—whether financial or otherwise—influence or could influence the objective performance of our professional duties and responsibilities.

We must avoid situations that involve or could involve a conflict between our personal interests and those of the Group, and we must withdraw from any decision-making process that creates or could be perceived as creating a conflict of interest.

In line with this requirement, we must not use our position at Waga Energy to generate personal gain or benefit.

You must disclose any potential conflict of interest to your manager or to the Legal & Compliance Department. Having a conflict of interest is not necessarily a violation of the Code, but failing to disclose it is.

Refer to the **Anti-Corruption and Conflict of Interest Policy**, which provides further details and specifies the course of action to follow in a conflict-of-interest situation.

b. Anti-corruption

Our reputation as a reliable business partner must never be compromised by any form of corruption. Corruption can have significant legal, financial, and reputational consequences.

Corruption refers to the act of a person in a public or private function requesting or accepting “something of value” to perform—or refrain from performing—an act within the scope of their duties.

“**Something of value**” may take various forms: money (cash, transfer, or other means), benefits in kind such as participation in marketing or entertainment events, travel, flight upgrades, vacation stays, sponsorship, or even hiring family members or friends.

The offense of corruption is established by the mere promise of an undue advantage, even if that advantage is never given or is refused. The mere intention to corrupt is punishable, even if the transaction does not occur.



There are several forms of corruption (facilitation payments, bribery, influence peddling, etc.). We distinguish between active and passive corruption, direct and indirect corruption, and corruption in the private or public sector.

All forms are prohibited in all of the Group's activities. These prohibitions also apply to anyone acting on behalf of Waga Energy.

Waga Energy does not tolerate any form of corruption—active or passive, direct or indirect, involving either public officials or private entities.

Corrupt activities are not only a violation of this Code; they also constitute a serious breach of criminal and civil anti-corruption laws in various countries.

If you become aware of a potential or actual corruption situation, or if you have doubts or identify a corruption risk, you must report it immediately to the Legal & Compliance Department following the procedures set out in Section 4.b, Internal reporting procedure to report incidents.

Everywhere we operate, at least one anti-corruption law applies to us and must be followed.

Refer to the **Anti-Corruption and Conflict of Interest Policy**, which provides further details and outlines the course of action to follow in a corruption situation.

c. Gifts, entertainment, and donations

In general, no significant gift from clients, suppliers (current or potential), or any other third party— including travel, meals, or free accommodation—may be accepted.

Likewise, we must limit the value of any gifts or benefits offered to business partners.

Business hospitality, including meals and entertainment, is not prohibited if the nature and frequency of the occasion are reasonable, if it involves legitimate business activities, and if it complies with the anti-corruption policy and with the travel policies specific to each subsidiary.

Giving or receiving gifts or invitations can easily lead to conflicts of interest or accusations of corruption. We must therefore exercise caution and maintain full transparency.

To avoid such situations, Waga Energy has established an anti-corruption policy including the Gifts and Hospitality policy that applies to all of us and is enforceable against all our partners.



As a general rule, we may not make donations (e.g., charitable contributions or the sponsorship of cultural or sports events) in connection with our employment at Waga Energy. As donations may present risks to Waga Energy, you must consult the Legal & Compliance Department for guidance on donations or sponsorships to external organizations.

Refer to the **Anti-Corruption and Conflict of Interest Policy**, which provides further details and specifies the guidelines to follow when giving or receiving gifts

d. Political activities

Waga Energy respects the sovereignty of all states and refrains from intervening in or financing political organizations in the countries where the Group operates.

Waga Energy does not provide political contributions—direct or through a third party—in cash or in kind.

e. Anti-money laundering and counter-terrorist financing

Waga Energy complies with all laws prohibiting money laundering and terrorist financing. Money laundering is the process by which individuals or groups attempt to conceal the proceeds of illegal activities or make the sources of illegal funds appear legitimate.

We must ensure we do business only with reputable clients for legitimate commercial purposes and with legitimate funds.

Particular attention must be paid to “red flags,” such as requests for cash payments, complex payment structures, or unusual payment terms from clients or suppliers.

If you suspect suspicious transactions or money-laundering activity, you must report it to the Legal & Compliance Department or the Group Finance Department.

f. Fair competition

Compliance with global competition laws is essential to Waga Energy’s business success.

It is prohibited to engage in agreements with competitors regarding pricing, market allocation, commercial strategy, or any practice that could distort free and fair competition.



We must not exchange sensitive information (pricing policies, business strategy, etc.) with competitors, nor seek to obtain such information illegally or unethically.

Meetings with competitors and market players held within the framework of professional associations may give rise to improper exchanges of sensitive data and market information or to agreements with competitors on matters falling under competition law.

We must remain vigilant of what we say during such meetings and during any informal discussions surrounding them.

Guidelines when attending professional association meetings:

- Request an agenda beforehand and review topics that may raise competition-law concerns. Consult the Legal & Compliance Department if in doubt.
- Request and review the meeting minutes.
- If inappropriate discussions arise, leave the meeting and request that your departure be recorded in the minutes.

g. Export Controls, Sanctions and Boycotts

It is essential that we comply with all applicable rules and regulations governing our international business activities, including exports or imports.

Wherever Waga Energy conducts business, we must comply with the economic sanctions and trade embargoes applicable to our activities. These measures aim to restrict or prohibit the trade of certain goods or services in specific countries and may include the freezing of funds and economic resources of key sectors of the targeted country.

If you are unsure whether a transaction complies with export laws and applicable sanctions and trade embargo programs, you must consult the Legal & Compliance Department and Supply Chain.

h. Fraud

You misuse Group resources and commit fraud when you intentionally conceal, alter, falsify, or omit information for your own benefit or for the benefit of others.

Fraud may be motivated by personal gain, such as obtaining a payment, or by the desire to avoid negative consequences such as disciplinary action.

Here are some examples of fraud:

- Altering sales figures;
- Submitting false medical information;



- Falsely reporting working hours;
- Entering false information in a company's books and records.

i. Company resources

Waga Energy's resources and assets have been acquired through the work and dedication of many Waga Energy employees over many years. We have a duty to protect these resources.

We are all required to use Waga Energy's property with care and to protect it against theft, damage, and loss.

This includes all Waga Energy facilities, equipment, furniture, vehicles, IT and network systems, supplies, company funds, as well as intangible assets such as confidential information and intellectual property.

The obligation to protect Waga Energy's funds is particularly important if you have spending authority, approve travel and entertainment expenses, or manage budgets and accounts.

You must always:

- Ensure that funds are used properly for Waga Energy's needs;
- Obtain the required approval before incurring any expense;
- Accurately record all expenses;
- Verify that expenses submitted for reimbursement are business-related, properly documented, and compliant with our procedures.

If you become aware of any misuse of Waga Energy resources, you are required to report it to the Legal & Compliance Department.

7. PROTECTION OF DATA AND INFORMATION

a. Confidentiality policy

Confidential information is defined as any information relating to Waga Energy that the Group does not wish to make public, regardless of its nature—commercial, technical, financial, operational, legal, or otherwise.

Confidential information is a valuable asset and must be protected from unauthorized disclosure to ensure our success and competitiveness.

Such information includes, but is not limited to: unpublished financial statements, strategic plans, operational results, marketing strategies, client lists, tender documents,

new project information, personnel files, engineering drawings and calculations, acquisition data and reports, and Waga Energy's processes and methods.

Employees who have access to confidential information must take the necessary measures to protect it and may disclose it only for legitimate business purposes and only to third parties who need it for a shared project.

If you need to share confidential information with a third party, you must obtain the signing of a non-disclosure agreement (NDA).

Likewise, you must protect confidential information received from clients and suppliers. You may therefore be required to sign a NDA provided by the other party.

If the proposed NDA is not Waga Energy's template, consult the Legal & Compliance Department before signing.

Refer to the **NDA Procedure**, which specifies the rules to follow and contains the confidentiality agreement templates to be used.

You must refrain from sharing inside information with anyone inside or outside the company. Inside information refers to any unpublished information about a listed company that could significantly influence the price of its securities if made public. It is therefore very important not to use inside information for personal gain through the purchase or sale of securities, and not to allow others to do so.

Refer to the **Market Ethics Principles and Rules**, which provides further details and sets out the applicable principles and rules, as well as the need to comply with them scrupulously.

b. Protection of personal data

The Group attaches great importance to protecting personal data collected in the course of its activities and processes it in compliance with the European General Data Protection Regulation (GDPR) and any other applicable regulations in each of its subsidiaries.

Personal data is any information relating to an identified or identifiable natural person. An identifiable person is any individual who can be identified, directly or indirectly.

We must respect everyone's privacy by protecting the data of our colleagues, customers, and other business partners.



Those of us who have access to this information must ensure that it is collected, stored, and used in a manner that complies with the laws in force in the places where we operate.

If we access this type of information or the systems that process it, we must comply with all applicable policies and laws governing the processing of such information. We must:

- Access, collect, and use only the personal information we need and are authorized to process for legitimate business purposes;
- Disclose personal information only to authorized persons who have a legitimate business need to know it and who are required to protect it;
- Store, transmit, and dispose of personal information securely, in accordance with applicable policies and laws;
- Report to the DPO (dpo@waga-energy.com) as soon as possible any data breach or any IT incident that could compromise the security level of such information.

More generally, inform the DPO (Data Protection Officer) of the personal data processing activities you manage so that the Record of Processing Activities can be updated and mandatory regulatory measures implemented.

c. Communication

Relation with the media and analysts

Waga Energy controls communication with the media (TV, radio, print, online).

Only authorized and trained employees may communicate with journalists. All media interactions require prior approval from General Management or the Finance Department.

If you are contacted—whether by email, telephone, or directly in the field—by members of the press, investors, or market analysts, do not provide any information and refer the requester to the persons mentioned above.

Social networks

We must all use external and internal social media with caution, even when doing so in a personal capacity. We must not transmit messages that are considered confidential or sensitive information, or that could be viewed as insulting, offensive, or degrading to individuals or companies.

In our private correspondence, we may not use the Group's letterhead or logo, and, more generally, we may not speak on behalf of Waga Energy unless we have been specifically authorized to do so.



We must comply with all rules relating to the protection of personal data when posting photos of individuals or groups.

Refer to the **Social Media Use Charter**, which provides further details and sets out the rules to be followed.

Email

Email is not always secure. Do not send or forward emails containing confidential or sensitive information outside Waga Energy unless a Non-Disclosure Agreement has been signed in advance.

Verbal communication

Exercise discretion when speaking outside of work, including at events, conferences, trade shows, restaurants, or public transport.

d. Information systems and cybersecurity

Our IT systems are a critical component of our business activities and are provided for authorized professional use. Waga Energy protects its information system against threats and cyberattacks, notably through strict control of access rights and the way systems are used by employees.

All professional and personal use of Waga Energy phones, computers, and other equipment must comply with the information security policies and the IT Charter applicable within each Group entity, and must also respect the right to disconnect. This right is defined as the employee's right not to be connected to professional digital tools and not to be contacted—including via personal communication devices—for work-related reasons outside their regular working hours.

We are all responsible for using Waga Energy's IT systems for ethical business purposes. Although occasional personal use of these systems is permitted, we must be aware that Waga Energy reserves the right to monitor the use of anything created, stored, sent, or received on the Group's IT systems, in accordance with local legislation. This includes all data and communications transmitted, received, or contained in emails and professional accounts, as well as all electronic documents stored on Group computers, mobile devices, and networks. We must not use Waga Energy's IT systems for unauthorized, non-business-related, illegal, or unethical purposes. This includes, but is not limited to:

- Downloading or transmitting materials that are illegal, abusive, or offensive, including profane or sexual content;
- Using Waga Energy's IT systems to solicit for external causes such as religious activities, political campaigns, or outside organizations;



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- Sending or downloading copyrighted material, trade secrets, confidential financial information, or similar documents without proper authorization;
- Any activity that violates the law, our Code, or Group procedures.

Refer to the **Charter for the use of IT resources** which provides further details and set out the rules to be followed