

The Cero logo consists of the word "cero" in a white, lowercase, sans-serif font. A small orange circle is positioned above the letter "o".

cero^o

Code of Conduct

2026



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01

Welcome

A message from the CEO



As we launch the second edition of Cero's Code of Conduct ("Code"), I would like to take a moment to reflect on what this Code represents – not just a set of rules, but a shared commitment to integrity, respect and accountability.

The way we conduct our business matters and integrity is at the heart of every decision that we make. Our success is determined by how we conduct ourselves, both individually and as a team.

Please ensure that you read and understand the Code.

You are highly encouraged to report any concerns or breaches of this Code

to your line manager, directly to the Compliance team by email to concerns@cerogeneration.com or confidentially via the HiBob Your Voice reporting tool.

All genuine concerns are promptly investigated and Cero is committed to ensuring that everyone can speak up without fear of negative consequences.

Our mission is to develop and deliver utility-scale solar and battery energy storage system projects that power the transition to a cleaner, more resilient energy system with trust and integrity in everything that we do.

Declan Deasy
CEO, Cero Generation

02

Our values

Activating our purpose

Our shared culture is all about doing the right thing for our company, our people and the world around us.

We're passionate about renewable energy and the vital role it can play in safeguarding the future of our planet. That's why we're all committed to collaborating to achieve excellence in

our field to deliver better outcomes for all.

We're led by a simple promise to all our people: you'll get back what you put in. We'll empower you to deliver on our commitments and reward you for achieving the high standards that we set.

Collaborative & accountable

We share thinking and own action

As an inclusive and multi-specialist team, we do our best when we work together. But collaborating can only succeed when we define the right team, roles and priorities, and each person takes responsibility for making things happen. Brilliant, co-creative work starts and ends with you.



Ambitious & impactful

We aim high to achieve more

As renewable energy champions, we're passionate about making a positive impact.

Always outcome-driven, we set goals and work smartly to deliver them.

We bring curiosity, innovation and hard work to every challenge. And we're natural problem solvers, being flexible to find the best solutions for better outcomes.



Courageous & caring

We're bold in doing the right thing

We're a company that really cares; about our people, our purpose and our impact. So, we do the right thing by our customers, communities and each other, as Cero.

We're independently-minded, confident in our expertise and bold in our decisions. We share a supportive, safe space for feedback, and respectfully challenge and change anything that doesn't feel right.

03

How the Code Of Conduct operates

How the code applies to you

This Code applies to all Cero staff employed or engaged by Cero Generation Limited and its integrated subsidiaries (“Cero”) and also applies to the voting directors of Cero Generation Limited.

This includes all Cero employees, nominee directors, officers, agency workers, seconded workers, volunteers, interns and individual temporary or fixed term contractors, wherever located (collectively, “Staff”).

Compliance with the Code is mandatory for all Staff. All existing and new Staff must read this Code and are expected to attend training to fully understand its requirements.

Annual compliance attestations are required from all Staff which includes confirmation that the Code has been read and understood.

Cero’s suppliers, developers, joint venture partners, agents, consultants, advisors or any other third party involved in our business (collectively, “Business Partners”) are expected to act in accordance with the principles of this Code, when involved in or conducting business, with or on behalf of Cero.

All Staff and Business Partners have a responsibility to report any breaches of the Code through the speak-up reporting channels.



How to use the code

We have highlighted the key requirements and expectations of you together with clear explanations and examples to help you understand the Code.

The Code contains a brief overview of Cero's key policies - a complete list of Cero's Policies is included in the Appendix. All Staff must be familiar with and comply with Cero's Policies, which are mandatory.

This Code is not intended to be a comprehensive rules-based document. We cannot address all of the potential ethical situations that you may face as part of your job roles. Instead, the Code provides principles-based standards and guidance that aim to both set out expectations and to assist in difficult ethical situations. Any situations where you feel uncomfortable, have doubts or would like further clarification, should be discussed with your line manager or the Compliance team.

Throughout the Code, real-life examples are provided to guide you on the appropriate course of action and our expectations of what you should and should not do.

Responsibility for the code

Cero Generation Limited's Board of Directors has overall responsibility for ensuring the Code meets and upholds our legal and ethical obligations, and that all Staff comply with it.

Cero's Compliance function has responsibility for implementing the Code, monitoring its use and effectiveness, dealing with any queries and concerns and auditing internal control systems and procedures to ensure they are effective in managing conduct.

All Staff have a responsibility to read, understand and comply with the Code in all business activities and should actively promote the principles of the Code to Cero's Business Partners.

All Staff also have a responsibility to report concerns or possible breaches of the Code and Cero's Policies and Procedures. See the "Reporting" section of the Code for guidance on how to do this.

Management at all levels are responsible for ensuring those reporting to them understand and comply with the Code and are given adequate and regular training on it, including the issues covered by it.



Consequences of failing to comply with the code

A breach of the Code will be investigated and may result in consequences, including a warning, impact to discretionary remuneration, impact to promotion and/or disciplinary action, including dismissal.

These consequences are set out in **Cero's Disciplinary Policy**.

Violations of the Code by temporary, consultant or interim Staff or Cero's Business Partners may lead to consequences, including contract termination.

You should

- Fully read and understand the Code
- Attend training provided by Cero on this Code
- Complete the mandatory annual compliance attestation

You should not

- Conduct actions or behaviours that breach this Code
- Ignore actions or behaviours that are not in line with this Code

04

Workplace environment

Professional behaviour

Staff are required to uphold professional standards in all interactions, whether in person, online, or through any communication medium.

This expectation encompasses demonstrating courtesy and respect at all times. Your conduct, both within and outside the workplace, should positively contribute to Cero's reputation and reflect positively on your individual professional image.

The definition of the workplace extends beyond the physical office to encompass virtual or remote work, work-related activities such as functions, business trips, off-site work, conferences, and the general use of Cero's technology (including e-

communication channels, accessing, viewing, storing, or transferring data), and, in certain circumstances, social media.

Cero is committed to maintaining a workplace where all individuals are treated with dignity, respect and fairness. Any harassment including sexual harassment is strictly prohibited and we have in place clear reporting channels. For further guidance, refer to Cero's **Anti-Harassment and Bullying Policy**.

Inappropriate behaviour poses potential risks. It is important to adhere to your responsibilities outlined in Cero's **Disciplinary Policy**, which are designed to foster collaborative and values-aligned actions among Staff.



“

Our people are the foundation of everything we achieve. The values shape our culture and ensure that every individual can thrive and contribute.

”

Alex Symon
People & Culture Director

Learning & development

Staff are strongly encouraged to proactively manage their professional growth by identifying training needs and participating in relevant courses.

Each Staff member is responsible for continually enhancing their skills and knowledge, aligning with current best practices within their respective roles. Cero provides various learning resources and courses designed to assist and empower individuals in reaching their maximum potential.

Regular discussions between Staff and their managers are crucial for pinpointing learning and development opportunities that contribute to career advancement. To ensure proficiency in your role and compliance with relevant licensing obligations, mandatory training, certification, continuous education, and testing may be required. Failure to fulfil mandatory training requirements within specified timeframes may lead to disciplinary measures.

Diversity, equality & inclusion

We are committed to promoting equal employment opportunities and want you to feel respected, valued and empowered.

Cero is a diverse company that operates across multiple European countries. We embrace the fact that our people come from different backgrounds and bring a range of skills and opinions. Everyone has an equal voice, and we are committed to providing an environment where we all feel comfortable expressing our ideas and opinions.

Cero's commitment, expectations and next steps in cases of breaches are set out in Cero's [Equal Opportunities Policy](#).

Grievances

Cero is committed to having in place a process to ensure all Staff are able to

raise grievances relating to their employment fairly and without unreasonable delay, in line with Cero's Grievance Procedure.

All grievances are investigated, and the outcome will be communicated to the Staff member, with a right of appeal if the Staff member is not satisfied.

Travel and expenses

As part of normal business activities, you may be required to travel to fulfil your job responsibilities and Cero will reimburse expenses properly incurred in accordance with the rules and limits set out in Cero's [Travel and Expenses Policy](#).

Any attempt to claim expenses fraudulently or that are not in line with the policy rules may result in disciplinary action in accordance with Cero's [Disciplinary Policy](#).

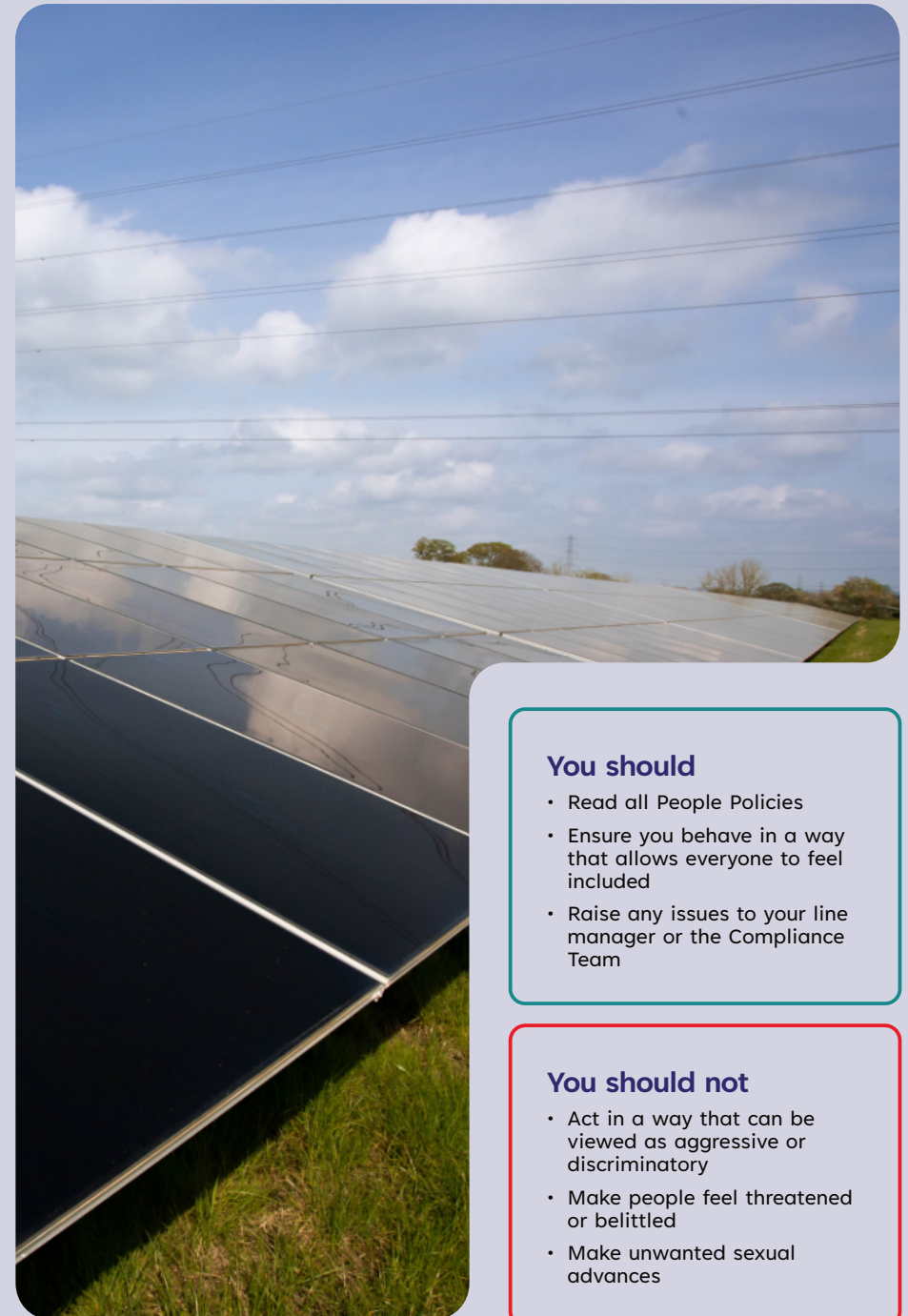
Protection of personal data

Cero collects personal data regarding individuals where there is lawful basis to do so, in accordance with the UK and EU General Data Protection Regulation ("GDPR").

We are committed to respecting and protecting the privacy of personal information obtained from individuals. Personal data is information that relates to an identified or identifiable individual and can include information such as a name, IP address or date of birth.

During the course of your job responsibilities, you may be required to process personal data. You should that all personal data is processed in line with Cero's [Privacy Policy](#).

Cero will only work with Business Partners that provide sufficient guarantees that personal data will be safeguarded and ensure that contracts with Business Partners meet all applicable data privacy requirements.



You should

- Read all People Policies
- Ensure you behave in a way that allows everyone to feel included
- Raise any issues to your line manager or the Compliance Team

You should not

- Act in a way that can be viewed as aggressive or discriminatory
- Make people feel threatened or belittled
- Make unwanted sexual advances

05

Acting with integrity

Compliance with laws & regulations

Cero complies with the laws and regulations wherever it does business, and we expect our Staff and Business Partners to do the same. This includes laws concerning matters of ethical conduct such as bribery, facilitation payments, sanctions, money laundering and data privacy.

Where this Code conflicts with any applicable law, regulation, or custom, the most stringent requirement must be followed.

Any questions about the applicability or interpretation of certain laws or regulations should be referred to Cero's Legal team.



“

Doing the right thing in all situations is a fundamental Cero value. This is a firm expectation of all Staff and Business Partners.

”

Robert Walker
Chief Legal Officer

Anti-Bribery and Corruption

Bribery involves exchanging or offering something of value to improperly influence a business decision or obtain a business advantage.

Cero's **Anti-Bribery and Corruption Policy** strictly prohibits any actual or attempted use of any type of bribery or corruption and will only conduct business in an honest and fair way. We are subject to several anti-bribery laws and regulations including the UK's Bribery Act.

Under no circumstance should you or anyone connected with Cero offer, promise, accept, request or authorise a bribe regardless of whether it is done to directly or indirectly, on behalf of, or for the benefit of, Cero.

Bribes can usually be found in the form of cash but can also be other things such as gift cards, entertainment, inappropriate discounts, job offers for a family member, travel and accommodation.

Cero's Compliance Programme is structured around the requirements of the UK's Bribery Act and implements the UK's Ministry of Justice guidance on procedures which organisations can put into place to prevent risks associated with bribery and corruption.

Preventing organised crimes

Cero is committed to preventing organised crime and all Staff and Business Partners must remain vigilant and adhere strictly to legal and ethical standards.

This includes rejecting any form of collusion, inappropriate payments or engagement with entities or individuals known or suspected to be involved in criminal networks.

Any suspicious activity must be reported immediately through the designated compliance speak up channels.

Facilitation payments

Facilitation payments are small amounts of money paid to public officials to speed up the execution of a routine procedure, which the public official is otherwise obligated to perform.

Examples include paying to speed up the process for environmental permits, receiving a visa quicker than the required waiting period and to the release of goods at a country's border. Facilitation payments are strictly prohibited under the UK's Bribery Act and are treated as a bribe.

Cero's **Anti-Bribery and Corruption Policy** prohibits facilitation payments in all forms, being offered or to be paid in any jurisdiction. If you are in a situation when a facilitation payment is requested, you must politely refuse and report this directly to the compliance team at Cero.



Case study

You have applied for an environmental permit on behalf of Cero for an ongoing greenfield project.

The permit officer offers to speed up the permit time scale if you pay a small fee directly in cash.

This is likely to be a request for a facilitation payment. You should decline and report this immediately to the Cero Compliance team.

Gifts and entertainment

The exchange of appropriate gifts and entertainment (“G&E”) is a normal part of business which helps Cero to build and maintain good relationships with our Business Partners.

However, these are subject to restrictions, declarations and an approval process to ensure that any G&E given or received is proportionate and appropriate in the circumstances and does not constitute an actual or perceived bribe.

G&E must not be overly lavish, frequent or give rise to actual or perceived conflicts of interest. G&E must not improperly influence your decision making or that of Cero’s Business Partners.

G&E provided to Public Officials or Politically Exposed Persons pose an even greater degree of risk and are subject to the highest level of scrutiny.

Depending on the value and type of G&E, you may be required to obtain pre-approval before receiving or giving such G&E.

Further details, including the declaration requirements for Cero’s G&E register, can be found in Cero’s **Anti-Bribery and Corruption Policy**.

All G&E costs incurred by Cero must be accurately recorded in Cero’s financial books and records.



You should

- Ensure you have pre-approval if above stated limits
- Ensure that any gift or entertainment that is offered or received is for a genuine business purpose
- Declare gifts and entertainment on the register when required

You should not

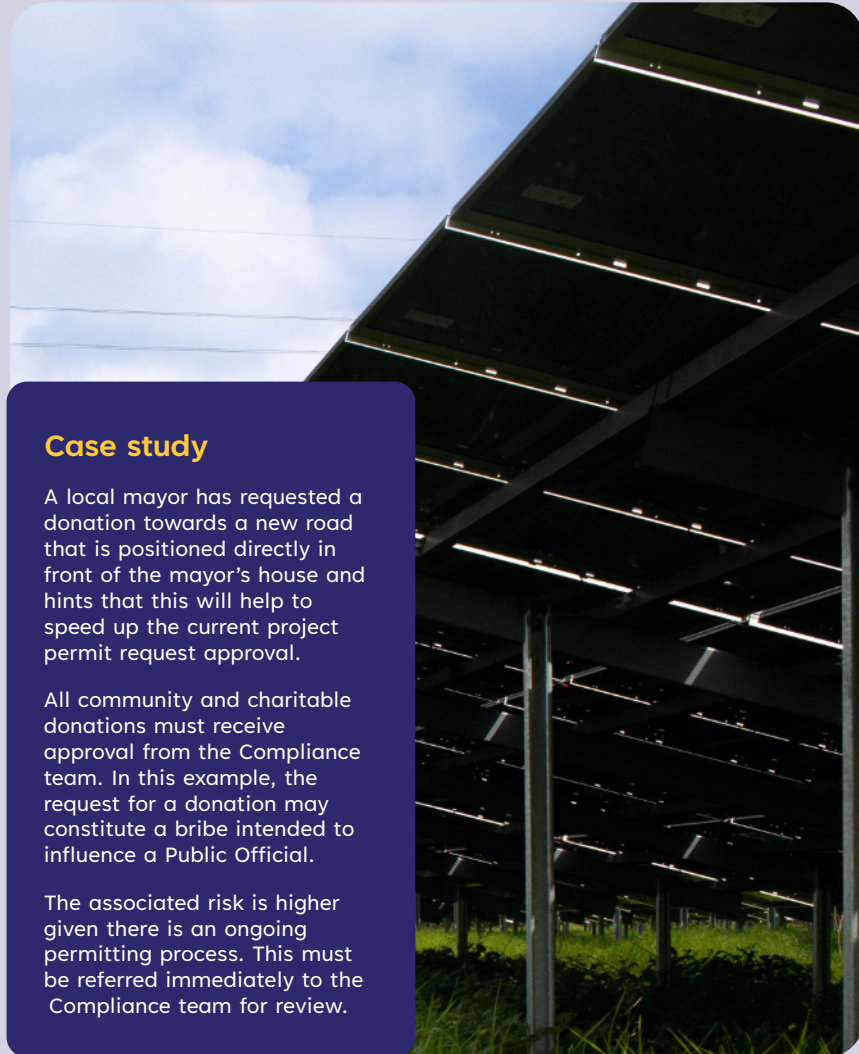
- Offer or accept any gift or entertainment that is too frequent or lavish
- Offer or accept any gift or entertainment to improperly influence a decision

Community & charitable donations

Charitable activity including community and charitable donations may be appropriate under certain circumstances, particularly when they help to support local communities and are in line with Cero's values.

However, donations can only be made for genuine purposes and must not be used to improperly influence anyone including public officials or politically exposed persons.

All community and charitable donations must receive appropriate internal approvals as set out in Cero's [Anti-Bribery and Corruption Policy](#).



Case study

A local mayor has requested a donation towards a new road that is positioned directly in front of the mayor's house and hints that this will help to speed up the current project permit request approval.

All community and charitable donations must receive approval from the Compliance team. In this example, the request for a donation may constitute a bribe intended to influence a Public Official.

The associated risk is higher given there is an ongoing permitting process. This must be referred immediately to the Compliance team for review.



Public officials and politically exposed persons

Public Official ("PO") is broadly defined and includes:

- Any person who, whether elected or appointed, holds a legislative, administrative or judicial position of any kind.
- Any person who performs public functions in any branch of the national, local or municipal government.
- Officials or agents of a public international organisation, such as the United Nations or World Bank.

Politically exposed persons ("PEPs") include persons who hold (or have previously held) a high-profile political role, or someone who has been entrusted with a prominent public function. Relatives and close associates of POs or PEPs may also be classified as PEPs.

Any interactions you have with POs or PEPs are deemed higher risk because of the actual or perceived position of influence of the PO or PEP. Public Official Corruption is when Public Officials seek illegitimate personal gain through actions such as bribery,

extortion, cronyism, patronage and embezzlement.

You must comply with all laws and regulations to ensure that Cero does not improperly influence POs or PEPs to obtain or retain business or an advantage in business. Strict guidelines, requirements and approvals are in place for any expenditure relating to POs or PEPs, as set out in Cero's [Anti-Bribery and Corruption Policy](#).

Did you know

The UK Bribery Act specifically created an offence relating to the bribery of a foreign public official in order to obtain or retain business.

This is why all PO and PEP interactions are closely reviewed and monitored by Cero to ensure no actual or perceived bribes are paid. Interactions can include gifts & entertainment, donations or other expenditure.



“

You're not expected to know what to do in every situation. The Compliance team is here to help everyone abide by the Code.

”

Chris Gregory
Senior Compliance Manager



Political donations

Political donations made by or on behalf of Cero are prohibited.

You must not make political donations in your personal capacity that could, or could be perceived to, have an association with Cero.

Prior approval is required for making personal political donations in a jurisdiction where Cero is conducting diligence on a potential project, or developing, constructing or operating a project.

Conflicts of interest

Conflicts of interest can occur when personal activities influence or appear to influence judgement on business decisions made for Cero.

Conflicts of interest can be actual, perceived or potential conflicts of interest.

You are required to declare conflicts of interest and any changes to existing conflicts already declared.

If you are unsure if a particular situation may give rise to a conflict of interest, further guidance should be sought from the Compliance team.

Case study

A family member of a staff member is currently involved in a Cero tender for their own company.

The staff member will be participating in the tender evaluation and is unsure if they need to take any action.

This could be an actual or perceived conflict of interest. The staff member should declare their conflict of interest to the Compliance team and the tender evaluation team for review.



Competition and competitive information

We adhere to all applicable anti-trust, competition and fair dealing laws in the markets where we operate.

Our aim is to excel through honest and ethical conduct, without resorting to unfair practices that exploit others.

We prohibit the unlawful and improper use of confidential information, trade secrets and proprietary information belonging to our competitors. We often enter into non-disclosure agreements and use our best endeavours to protect sensitive information we obtain from other industry players.

You are expected to identify key types of competition information and to ensure that you act in accordance with competitions laws. Further guidance can be obtained from the Legal team.

State subsidy compliance

Cero is committed to ethical conduct and sustainable development. We recognise the importance of transparency, legality and accountability in all interactions involving public financial support.

We will comply fully with all applicable laws, regulations and guidance governing state subsidies in the countries that we operate.

Cero Staff are strictly prohibited from accepting any form of benefit in exchange for favourable subsidy treatment. Any suspected misuse or misrepresentation of subsidy-related information must be reporting to the Cero Compliance team.

Trade sanctions and import/export controls

Cero complies with all applicable international and domestic trade sanctions and import/export controls

laws and regulations.

Cero performs due diligence and ongoing monitoring of its Business Partners including developers, suppliers, contractors, joint venture partners, agents, consultants and other third parties, to ensure that our Business Partners are not subject to sanctions or import/export controls impacting Cero's business.

Appropriate provisions are included in our contracts to ensure our Business Partners also act in compliance with applicable sanctions and import/export controls.

Facilitation of tax evasion

Cero complies with all applicable tax laws regulations in the countries where it operates.

There is a zero-tolerance approach in Cero for unlawfully facilitating tax evasion. Cero has published a UK Tax Strategy on the website, which provides further details.

Preventing financial crimes

Financial Crimes refers to all crimes that involve taking money or other property that belong to someone else to obtain a financial or professional gain. This type of crime includes fraud, money laundering, terrorist financing and any form of organised crime.

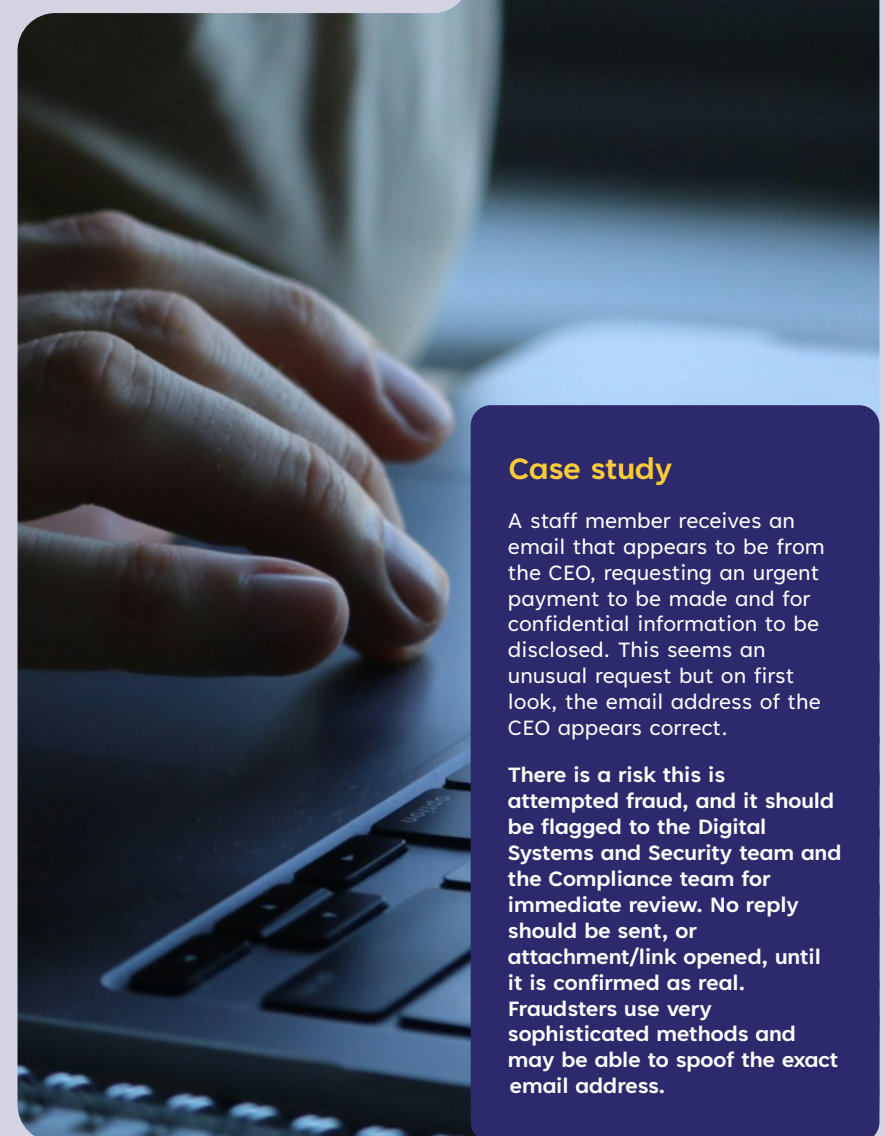
Fraud is defined as any intentional act of deception for personal or corporate gain and is strictly prohibited in any circumstance. This includes, but is not limited to, falsifying financial records, misappropriating assets and providing misleading information to stakeholders.

All Staff and Business Partners must remain vigilant and report any suspected fraudulent activity immediately.

Cero operates under a risk

management framework that aims to help prevent the facilitation of Financial Crimes by Staff or Business Partners.

Cero will not knowingly facilitate or support any type of Financial Crime.



Case study

A staff member receives an email that appears to be from the CEO, requesting an urgent payment to be made and for confidential information to be disclosed. This seems an unusual request but on first look, the email address of the CEO appears correct.

There is a risk this is attempted fraud, and it should be flagged to the Digital Systems and Security team and the Compliance team for immediate review. No reply should be sent, or attachment/link opened, until it is confirmed as real. Fraudsters use very sophisticated methods and may be able to spoof the exact email address.

06

Operations & WHSES



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Operational success is built on the strength and safety of our people. Across every site and region, we are committed to maintaining the highest standards of health and safety.

”

Marta Sanchez Lopez
Chief Operating Officer

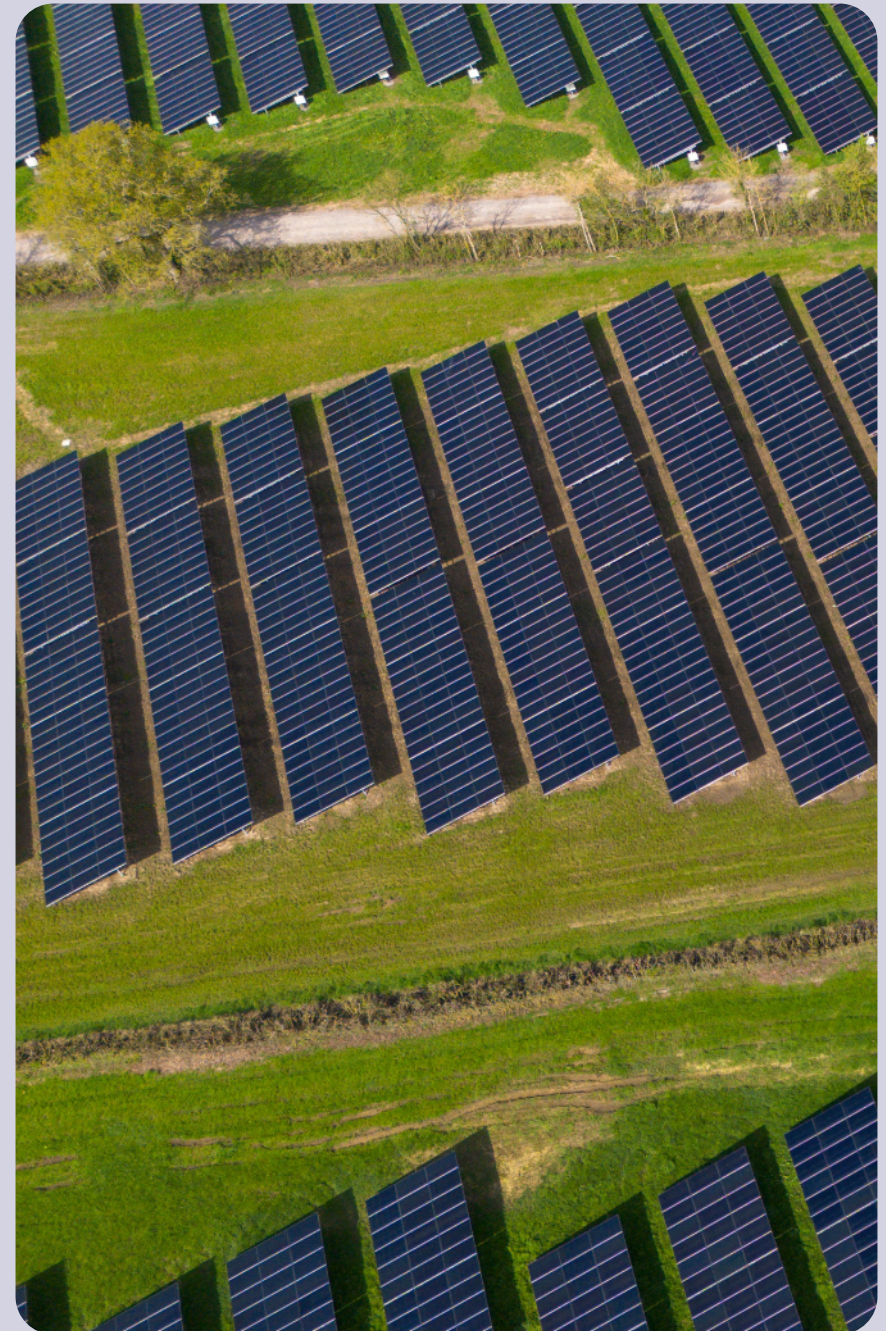
Environmental operation compliance

We operate a **Workplace Health, Safety, Environment and Social (“WHSES”) Policy that applies to all Staff and Business Partners**. You are required to act in line with the requirements, and failure to comply with or meet the stated standards may be dealt with in accordance with **Cero’s Disciplinary Procedure**.

Cero is fully committed to implementing WHSES measures aimed at preventing injury, ill health, environmental contamination, minimising waste and promoting a positive WHSES and behaviour-based safety culture.

Cero is committed to consistent delivery of high standards and adheres to the following core principles across its business activities:

- Demonstrate strong and visible leadership on WHSES matters.
- Promote WHSES as a core value across all operations.
- Foster a proactive, no-blame safety culture and promote strong WHSES governance and culture.
- Provide a safe and healthy working environment for all personnel including employees, contractors and subcontractors.
- Comply with and where possible exceed all applicable WHSES laws, regulations and Cero’s WHSES requirements.
- Engage and train employees to enhance WHSES awareness and drive continuous WHSES improvement.
- Recognise and reward safe practices and proactive incident prevention.
- Share and exchange WHSES knowledge internally and externally.
- Set, review and integrate WHSES performance targets and KPIs into business objectives and incentive structures.
- Allocate adequate resources for continual WHSES improvement.
- Monitor, audit and inspect all activities to ensure WHSES compliance and drive performance.
- Reduce risk to ALARP (As Low As Reasonably Practicable) for people, communities and the environment.
- Ensure safe project delivery and maintain robust emergency preparedness.
- Seek innovative solutions to minimise environmental and social impacts.
- Prevent pollution and protect the environment.
- Promote circular economy principles to reduce environmental footprint.
- Respect human rights and prevent modern slavery in all operation and supply chains.
- Ensure contractors and subcontractors align with Cero’s WHSES policies and procedures to the fullest extent possible.



Safety

Safety is a reflection of how Cero leads, collaborates and cares.

The following principles build trust, protect what matters most and pursue excellence through shared responsibility:



Commitment & Leadership

Safety starts with our unwavering commitment and courageous decisions. We lead by example, take bold actions, and prioritise safety in every task — because caring leadership creates real impact. We are ambitious in our safety goals and collaborative in our pursuit of excellence.

Empowerment & Engagement

We empower every team member to speak up, stop unsafe acts, and contribute to a culture of care. Engagement means everyone is heard and valued — safety is everyone's voice. Together, we are accountable to each other and collectively responsible for building a safer, stronger Cero.

Respect for People, Planet & Purpose

We act with integrity and respect toward each other, our communities, and the environment. We do the right thing, even when it's difficult. This is how we stay true to our purpose, act with care, and drive meaningful, lasting impact.

Ownership & Accountability

We take responsibility for our actions and outcomes. Safety is everyone's job. We hold ourselves and each other to the highest standards — not just to meet expectations, but to exceed them. Our ambition is to make every Cero site a model of accountability and care.

If you have any doubts, then please engage the WHSES team who will be able guide you.



You should

- Follow awareness safety trainings & surveys or campaigns
- Lead by example and report any incidents or unsafe situations
- Take care and look after the welfare of yourself and others
- Ensure you are competent and capable to carry out the work required, if not let your line manager know

You should not

- Travel without planning the visit properly
- Ignore WHSES trainings and WHSES risks that have been explained to you
- Ignore unsafe practices and don't report safety incidents
- Ignore your personal physical or psychological conditions in your daily activities and seek advice where required

Circular economy

Cero is committed to transitioning to a circular economy by reducing material waste, maximising asset life, and ensuring high-value recovery at end-of-life.

We prioritise recyclable, repairable, and modular components with transparent sustainability credentials.

We follow the EU Waste Framework Directive (Directive 2008/98/EC) and apply the waste hierarchy across all project stages, documented in project specific waste management plans. WHSES indicators and targets are defined and monitored to ensure effective implementation and continuous improvement.

Communities

Cero engages with local communities as part of its project planning process. We aim to ensure that the community has an open forum of communication with Cero, where any questions can be raised and the impact on the community can be discussed.

Cero is proud to support the local communities through donations and sponsorship for causes that align with Cero's values.

Respect for the environment

Cero is committed to helping deliver a net-zero future, for this and every generation.

Our business is founded upon being a part of the energy transition to help de-carbonise the energy sector in Europe and therefore we deeply respect the environment.

We take our environmental responsibilities seriously and are a sponsor member of the Solar Stewardship Initiative which aims to develop a responsible, transparent and sustainable solar value chain.

Human rights

Cero supports fundamental human rights as set out in the Universal Declaration of Human Rights and core International Labour Organisation conventions.

In line with the UN Guiding Principles on Business and Human Rights, Cero recognises the duty of States to protect human rights and the responsibility of businesses to respect human rights.

Cero takes all necessary steps to identify any form of forced or involuntary labour and expected from our business operations and supply chain fair and appropriate labour conditions, ensuring that all overtime work is voluntary, and employees are not required to exceed the local legal limits for regular wage and overtime hours giving opportunity to provide a workplace where all employees have the same rights and access to equal opportunities.

Under this purpose, Cero is partnering with trade bodies across multiple regions and collaborating with organisations dedicated to supporting the industry on transparency and compliance with human rights.

Our risk management framework and associated policies and procedures, including the Principles for Suppliers, define how we conduct due diligence on our Business Partners, including their compliance with human rights laws and regulations.

Modern slavery and child labour

Cero is opposed to all forms of modern slavery which refers to situations where individuals are exploited and cannot leave or refuse due to threats, coercion or abuse of power.

This term includes exploitation such as human trafficking, forced labour, deceptive recruitment, debt bondage,

servitude and child labour.

Our annual Modern Slavery Statement is published on the Cero website, which sets out in detail our policies, business risks and the key steps being taken to reduce the risk of modern slavery and child labour in our operations and supply chains.

You must be aware of potential red flags and to report any issues identified to the Compliance team.

Did you know?

The UK has a legally binding requirement to reach net zero emissions by the year 2050.

The EU set a legally binding target of net zero greenhouse gas emissions by the year 2050.



Case study

A staff member is conducting a site visit and after reviewing the rota schedules, notices that some on site workers have worked for 60 days in a row, without a day off.

When this was raised with the site supervisor, comments were made that this meant the workers had a higher pay-check for the month and therefore it was benefitting them.

This issue should be raised to the Compliance and WHSES teams, since the number of days worked is likely to contravene the local working laws and may indicate other potential human right issues or operational safety issues.

Company assets and information

Intellectual property

Intellectual property refers to patents, trade secrets and knowhow, copyright materials, trademarks and registered designs that are fundamental to our business and are legally protected and owned by Cero.

You are required to respect the intellectual property rights of others, including copyrights, trademarks, and patents.

Use of third-party intellectual property without proper authorisation is strictly prohibited and you are responsible for handling proprietary information with the utmost care. You must follow all relevant policies and procedures regarding information security and ensure its proper management.

Any intellectual property created by Staff within the scope of their employment with Cero shall be the sole property of the company, subject to any specific agreements or contractual arrangements.

Confidential information

Confidential information refers to any data, knowledge or materials that are not publicly available and could potentially harm our company, Staff, clients or Business Partners if disclosed to unauthorised individuals or entities. We adopt a wide definition of confidential information to include all information of any kind.

It is crucial you maintain strict confidentiality and refrain from disclosing such information to third parties unless there are appropriate safeguards in place, such as an executed non-disclosure agreement.

We provide training to all Staff about the importance of protecting confidential information and company property. Doing so also safeguards the trust and confidence of our partners and stakeholders, demonstrating a commitment to maintaining their privacy and security.



You should

- Engage the Company Secretary and Compliance teams regarding any personal data or identification requests
- Review all emails with attachments to ensure personal data is not inadvertently shared
- Notify compliance immediately if there are any personal data breaches

You should not

- Send or receive personal data without the appropriate consent from the individual
- Send or receive forms of identification through email that has not been appropriately protected
- Store any personal data on shared folders or other systems without appropriate system protection

Data protection and GDPR

Confidential information refers to any data, knowledge or materials that are not publicly available and could potentially harm our company, Staff, clients or partners if disclosed to unauthorised individuals or entities. We adopt a wide definition of confidential information to include all information of any kind.

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We provide training to all Staff about the importance of protecting confidential information and company property. Doing so also safeguards the trust and confidence of our partners and stakeholders, demonstrating a commitment to maintaining their privacy and security.

Use of information and communication systems

Our Information Technology (“IT”) and communications systems are intended to promote effective communication and working practices within our organisation.

It is your responsibility to act in accordance with Cero’s **Information Security Policy** when using Cero’s systems, to support Cero’s efforts to protect the confidentiality, integrity and availability of our data and systems.

All company data must be stored in approved company systems, and due care taken when sharing this data both internally, and externally.

All efforts should be taken to protect your individual access to these systems

and data, by using strong passwords and multi-factor authentication where available, being aware of, and cautious of, potential attacks through common means such as phishing emails and messages, or malicious websites.

Confidential data should be protected in the event of loss or theft of IT devices. Passwords must be used to secure access to confidential data. You should also be aware that there is a risk that documents may be read by outside third parties, for example, by passengers on public transport.

Social media

Any professional and personal use of social media should be conducted in line with Cero’s Values and the Disciplinary Procedure. Any serious misuse of social media that brings Cero into disrepute will be investigated.

Use of devices

You are responsible for the security of the equipment allocated to you and should take reasonable precautions to ensure that these are protected.

Data on company devices such as existing systems, programs, information, or data should not be deleted, destroyed or modified without appropriate authorisation.

IT and cybersecurity incidents

All potential or known incidents should be reported to the Digital Systems and Security team as a matter of urgency.

Speed of response is a critical factor in successfully minimising the impact, so reporting all incidents, even if they appear to be minor, is critical to our operational success.

Generative AI (Artificial Intelligence)

Staff must only use AI tools in accordance with Cero’s **Information Security Policy**. Use of any other generative AI tool requires prior approval from the Head of Digital Systems and Security.

Cero Staff are responsible for ensuring that any work product that comprises AI-generated content:

- Is accurate, complete and not misleading
- Avoids plagiarism, duplication or misrepresentation
- Applies human judgment in priority to AI-generated content

Records management

Cero accurately and completely records and reports all financial and non-financial company information. This is essential to comply with applicable legal and regulatory requirements.

You must ensure that all transactions are appropriately recorded, they follow internal procedures and respond to any lawful requests for information from governments and regulatory authorities.

We maintain appropriate accounting policies, standards, procedures and controls in place to ensure that all financial transactions are appropriately accounted for.

You must ensure that you create, retain and dispose of records in accordance with Cero’s **Data Retention Policy**.



Case study

A staff member takes their laptop and work mobile phone with them for a business trip to allow them to work while travelling. When the staff member arrives home, they can no longer find their work mobile phone, but they are not sure if it was lost or stolen.

In this situation, the staff member should immediately notify both the Cero Digital Systems and Security and Compliance team, even if they do not know if the device has been stolen or simply lost. This will allow the team to take steps to protect Cero’s data.

Reporting

Breach, Incidents and Escalation Policy

Staff are required to escalate any suspected or actual breaches of internal policies and procedures, external rules and regulations, and any operational incidents, in line with Cero's [Breach, Incident and Escalation Policy](#).

The escalation of suspected or actual incidents is a key part of how Cero manages risk.

Cero will ensure that any suspected or actual breaches are appropriately managed in a timely manner and minimise any potential losses.

Speak-up

A culture of openness and accountability is essential in order to prevent illegal or unethical conduct situations occurring and to address these situations when they do occur.

You are encouraged to speak up if you have a genuine concern regarding any

breaches of our internal policies and procedures including this Code or external laws and regulations. This should be done promptly through any of the following reporting channels:

- Your line manager
- The Compliance team
- Email concerns@cerogeneration.com
- Anonymously via the [HiBob Your Voice reporting tool](#)

We hope that you are able to voice your concerns openly. However, Staff can also raise concerns confidentially, and we will make every effort to keep your identity confidential if that is your preference.

Cero's [Whistleblowing Policy](#) sets out the steps taken to ensure that any genuine concerns raised by a reporter will be fully investigated. The reporter will not suffer any detrimental treatment from raising a genuine concern.



Did you know?

Research in 2024 found 18% of workers have disclosed that they have witnessed conduct that they thought violated either the law or the organisation's ethical standards in the last year.



Appendix

Index of Cero Policies

Anti-Bribery and Corruption Policy

Anti-Harassment and Bullying Policy

Breach, Incident and Escalation Policy

Counterparty Financial Crime Due Diligence Procedure

Data Protection Policy and Employee Privacy Notice

Data Retention Policy

Data Subject Rights Policy

Disciplinary Policy

Equal Opportunities Policy

Grievance Procedure

Information Security Policy

Principles for Suppliers

Travel and Expenses Policy

Whistleblowing Policy

Workplace Health, Safety, Environment and Social Policy

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