EMPOWER CONFIDENTIALITY POLICY

This Confidentiality Policy comprises one of the Empower Compliance Policies, all of which are accessible on the Compliance Pages of Empower's website.

1. AIMS & OBJECTIVES

Employees and personnel of Empower New Energy AS and its subsidiaries, partners and associate companies (**Empower**) have a duty of maintaining the confidentiality of information received by them in the course of their employment or engagement with Empower. All employees and affiliates of Empower are obligated to keep such information strictly confidential in compliance with Data Protection Laws, and to preserve the integrity of Empower's operations.

This Confidentiality Policy documents the confidentiality and non-disclosure duties and obligations of all individuals working at all levels and grades, including directors, senior managers, officers, employees (whether permanent, fixed-term or temporary), consultants, independent contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries and their employees, wherever located worldwide (**Empower Personnel**).

This Policy explains how Empower Personnel are required to treat confidential and sensitive information, and consequences for inappropriate management of the same. Unless otherwise stated, this policy affects all employees, board members, investors, agents, consultants, contractors, and volunteers of Empower who have access to confidential and sensitive information

Empower Personnel will, in the course of their employment and engagement, become aware of and possess information of Empower or of third parties disclosed to Empower that is not generally known. This may include information which if disclosed could jeopardise the interests of Empower. It may also include commercial trade secrets disclosure of which could harm the interests and business operations of Empower. All Empower Personnel have a duty to keep such information strictly confidential and to use it only for the proper purposes in accordance with the law and in compliance with this policy.

2. PURPOSE

The purpose of this Confidentiality Policy is to lay down the principles that must be observed by all who work with Empower and have access to confidential information. This Policy, where relevant, should be read in conjunction with the appointment letter and/or employment contract applicable to Empower Personnel, and other work rules, policies and procedures applicable to Empower Personnel.

3. CONFIDENTIAL INFORMATION

Confidential information includes any information which is not publicly known. It can concern technology, business, finance, transaction or other affairs of a company. It includes information which is commercially valuable such as trade secrets or business information, as well as personal information.

Examples of confidential information include, but are not limited to: any document, discovery, invention, improvement, patent specification, formulations, plans, ideas, books, accounts, data, reports, drafts of documents of all kinds, correspondence, lists and files, decisions, information about employees, strategies, drawings, recommendations, designs, office precedents, policies and procedures, internal correspondence, data of current and prospective investors, customers, partners and vendors, unpublished financial information, projections and business plans, data from third parties, pricing and marketing strategies, budget and financial information in any form, i.e. physical, electronic, electromagnetic or otherwise , and documents, mails and processes that are explicitly classified and marked as confidential.

Confidential information does not include information that Empower Personnel can demonstrate: is or becomes publicly available other than through a breach of this Policy; was lawfully known to the recipient before disclosure by Empower; is received lawfully from a third party without an obligation of confidentiality; or is independently developed without reference to confidential information.

Empower shall classify information according to its sensitivity and the harm that could result from unauthorised access, use, alteration, loss or disclosure. At a minimum, information shall be designated as Public, Internal, Confidential or Restricted. Empower Personnel must apply the handling, access, transmission, storage, retention and disposal requirements prescribed for the applicable classification and must seek guidance from the Chief Legal Officer or other designated employee where the appropriate classification is unclear.

4. PRINCIPLES

Empower expects all Empower Personnel to handle all confidential information in a sensitive and professional manner. Empower Personnel are under an obligation not to gain access or attempt to gain access to information which they are not authorised to have.

Empower, however, recognises the importance of an open culture with clear communication and accountability. Empower desires to maintain personal and organisational safety and expects all employees and personnel to handle confidential information in a way which protects organizational security.

The purpose of confidentiality is essentially two-fold. Firstly, it protects sensitive or confidential information of Empower and its clients and customers. Secondly, in order for Empower to be effective, Empower Personnel must be able to share information and knowledge, and therefore confidentiality is necessary as a condition of trust. Empower Personnel and affiliates with access to sensitive information shall use confidential information solely for the purposes of performing their duties as an employee of Empower and not for personal gain.

5. MAINTENANCE OF CONFIDENTIALITY & NON-DISCLOSURE

Empower Personnel:

- must keep confidential all confidential information;

- may use confidential information solely for the purposes of performing their duties as an employee of the Empower; and
- may only disclose confidential information to persons who are aware that the confidential information must be kept confidential and who have a need to know (but only to the extent that each person has a need to know).

Empower Personnel's obligation of maintaining confidentiality and non-disclosure does not extend to confidential information that is required to be disclosed by the employee pursuant to an order of a Court or any statutory authority. The employee or person will promptly notify the Company of any such requirement to enable the Company to take necessary action as deemed fit by the Company in the circumstances.

At the end of the period of employment, Empower Personnel must return to Empower:

- all confidential information in material form;
- those parts of all notes and other records in whatsoever form, based on or incorporating confidential information;
- all copies of confidential information and notes and other records based on or incorporating confidential information; and
- all of Empower property and assets, in the possession or control of the Empower Personnel.

The obligation of maintaining confidentiality and non-disclosure will continue even after the end of the period of employment or engagement in respect of all confidential information.

Any employee found to be in breach of this confidentiality and non-disclosure obligation, whilst employed by Empower will be disciplined, and in serious instances, dismissed. Any ex-employee found to be in breach of this confidentiality obligation may be subject to legal action being taken against them, dependent upon the circumstances of the breach, including cancellation / withdrawal of any or all benefits if extended to the ex-employee by the Company.

This Policy will operate in conjunction with the contract of employment or letter of appointment for Empower Personnel.

6. NEED TO KNOW

Confidential information is only to be disclosed on a "need to know" basis, only when the information is necessary to the employee for performing his or her employment duties effectively.

Access to confidential information must be granted on the principles of least privilege and need to know, approved by the relevant information owner, and reviewed periodically and whenever an individual changes role or responsibilities. Access must be withdrawn promptly when it is no longer required and, in all cases, upon termination of employment or engagement.

7. CIRCUMSTANCES IN WHICH INFORMATION CAN BE DISCLOSED

The following are circumstances in which sensitive or restricted information can be disclosed by Empower Personnel;

- With the written consent of their Line Manager and for a specified purpose.

- If the information is required by or under a Court order or of a statutory authority, the employee or person will promptly notify the Company of any such requirement to enable the Company to take necessary action as deemed fit by the Company in the circumstances.
- Where disclosure can be justified for any other purpose. This is usually for the protection of the public and is likely to be in relation to the prevention and detection of serious crime. A request for information by the police must be carefully considered. The Empower Personnel must be able to justify any decision when information has been disclosed.

8. MAINTAINING CONFIDENTIALITY UNDER THE WHISTLEBLOWING POLICY

You will not be required to provide your name when making a disclosure. To make a disclosure on an anonymous basis, it is recommended that you use a pseudonym and contact the Whistleblowing Protection Officers in the manner outlined above.

If you report on an anonymous basis, you will still qualify for the protections in this policy.

If you make a disclosure under this policy, your identity (or any information which would likely to identify you) will only be shared if:

- You give your consent to share that information; or
- The disclosure is allowed or required by law (for example where the concern is raised with a lawyer for the purposes of obtaining legal advice); or
- The concern is reported to relevant regulators;

Where it is necessary to disclose information for the effective investigation of the matter, and this is likely to lead to your identification, all reasonable steps will be taken to reduce the risk that you will be identified. For example, all personal information or reference to you witnessing an event will be redacted from any report, you will be referred to in a gender-neutral context, where possible you will be contacted to help identify certain aspects of your disclosure that could inadvertently identify you. Any disclosure under this policy will also be handled and investigated by qualified staff.

Empower will also take the following measures for protecting your identity:

- All paper and electronic documents and other materials relating to disclosures will be stored securely;
- Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
- Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of your identity (subject to your consent) or information that is likely to lead to your identification;
- Communications and documents relating to the investigation of a disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and
- Each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of your identity amounts to a breach of this policy and may constitute a criminal offence.

9. STORAGE OF DATA

No written document containing confidential information must be left visible where it can be read by anyone. This includes telephone messages, computer prints, letters and other documents. All hardware containing confidential information must be housed in a secure environment. Security precautions must be taken in accordance with Empower Policy and Procedures.

When working remotely or outside Empower premises, Empower Personnel must take reasonable measures to prevent unauthorised persons from viewing, overhearing or accessing confidential information. Confidential information may be transmitted only through communication channels, devices, applications and storage locations approved by Empower, and must not be forwarded to personal email accounts, stored on personal devices or removable media, or discussed in public or shared spaces unless expressly authorised and appropriately protected.

10. THE MEDIA

Confidential information must not be passed on to members of the press, or other media communications without the written consent of their Line Manager or the Chief Legal Officer, and for a specified purpose. All requests from the media must be dealt with under the advisement of Empower's Chief Legal Officer.

11. DISPOSAL OF INFORMATION

All media containing confidential information must be disposed of in a manner that ensures that information is not disclosed to an unauthorised person. At the termination of Empower Personnel's engagement with Empower, the Personnel must confirm in writing that all information, in any format, relating to Empower, its partners, investors, subsidiaries and affiliates in their possession has been disposed of in the manner approved and subsequently communicated by Empower.

Confidential information must be retained only for as long as required for the authorised business purpose and in accordance with Empower's approved retention schedule and applicable legal, regulatory, contractual and audit requirements. Information subject to a legal hold, investigation, dispute or regulatory request must not be altered or destroyed until the hold is formally released by the Chief Legal Officer or an authorised delegate.

12. BREACH

The best protection against breaches against this Policy is to keep the number of employees and personnel who have access to sensitive information to a necessary minimum. Intentional, repeated, accidental, or unauthorised disclosure of any confidential information by any member of staff will be subject to disciplinary action. Any such disciplinary action will take account of the confidential and possible sensitive nature of the information and will make sure that in dealing with it, no further breaches of confidentiality take place.

Empower Personnel must immediately report any actual or suspected loss, unauthorised access, disclosure, alteration or misuse of confidential information through the incident-reporting channel designated by Empower. Reports must include all available relevant details, and the reporting person must preserve

evidence, follow reasonable containment instructions and refrain from investigating the incident independently unless authorised to do so. No person will be penalised for making a good-faith report

Empower Personnel must complete confidentiality and information-handling training on joining Empower and periodically thereafter, and must acknowledge that they have read, understood and will comply with this Policy. Additional role-based training may be required for personnel who routinely handle Restricted information, personal information, commercially sensitive information or third-party confidential information.

Employees are encouraged to read this policy in conjunction with other relevant Company policies and Empower's Code of Conduct.

Empower New Energy AS
Last Updated October 2026