

Company: OX2 Group all entities	Documentation name: OX2 Entertainment policy document	Date of sign-off by Management: / Sofia Brax
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OX2 Entertainment policy document

1. Background

1.1. General

As part of the business conducted by OX2 it is necessary from time to time to have costs associated with entertainment. This policy document (the “Policy”) sets the framework for the type of entertainment costs that are allowed and specific amounts where applicable.

1.2. Purpose

The policy aims to ensure a uniform view on how and when entertainment shall be conducted by the employees of OX2. The policy also aims to ensure better cost control. The policy does not in detail regulate how entertainment shall be conducted.

1.3. Scope

The Policy is applicable in all companies and all countries where OX2 conducts business.

To be noted is that costs for entertainment is treated differently in different countries. Thus, the tax treatment of OX2 and the employee may differ depending on the relevant country. OX2 does not reimburse employees for taxable benefits or similar incurred in connection to entertainment even if the entertainment is in line with this Policy. This means that even if something is allowed under this Policy it can still constitute a taxable benefit for the employee depending on the circumstances at hand.

1.4. Responsibility

Each employee has the responsibility to ensure that his or her own actions complies with this policy. Line managers have the responsibility for informing their employees of the existence of this policy.

2. Entertainment

2.1. Introduction

All entertainment where employees of OX2 participate, no matter whether it is OX2 or another party who carry the cost, shall be directly business related. The costs shall be motivated by business reasons, moderate and adapted to each occasion. Alcoholic beverages may be consumed but with restraint. Lunch and dinner are viewed as separate entertainment occasions even if they occur on the same day.

2.2. Internal entertainment

Internal entertainment is aimed towards OX2 employees in order to improve wellbeing, efficiency and community. Below is a list of the different types of internal entertainment that is allowed within OX2 and where the expense is carried by OX2.

Please also refer to heading 3 below for guidelines regarding “Internal trainings and internal conferences”.

Note that OX2 does not pay any per diems if meals are provided at the cost of OX2.

Team building

- Team activities are allowed four times per year. A team activity usually involves dinner and some sort of activity but no overnight stay.
- Amount shall be specified in team budgets per year.

Lunches, dinners, and other occasions involving food and drink

- Breakfast at the office is allowed occasionally
- Social gathering with customary snack etc. after work at the office is allowed occasionally
- At the first day of work the new employee with team may have lunch together at OX2's cost.
- When an OX2 employee is visiting an office in another country for the first time, the employee and local relevant team may have lunch at OX2's cost.
- Once a year a manager may have lunch with the employees to discuss the yearly progress and development at OX2's cost.

- Lunches at internal meetings are allowed at OX2's cost but should be avoided to the extent possible so that lunch time is a time for recreation and rest.
- In connection to the closing of a successful transaction (Financial Close) a celebration dinner is allowed.
- In connection to the successful handover of a solar / wind park (Commercial Operations Date) a celebration dinner is allowed.
- Team lunch is allowed at OX2's cost once monthly.
- Dinner/lunch may be allowed at OX2's cost in connection to other occasions such as meetings involving a larger number of employees, meet and greet with new employees and always subject to line managers approval.

No specific amounts have been determined with regards to lunches and dinners, but regular moderation shall be applied.

Gifts and celebrations

- 50-year birthday: flowers and cake
- "Even" birthday which is not 50 (e.g. 30, 40, 60 etc.): flowers
- Employment 10, 20 and 25 years: flowers and a gift at maximum market value of 30 EUR
- Retirement: flowers, cake and a gift at maximum market value of 150EUR
- When an employee terminates his or her employment at OX2 (other than retirement): flowers and coffee
- When a trainee ends his or hers training period: coffee
- Weddings: flowers at maximum market value of 45 EUR.
- Child birth: flowers at maximum market value of 45 EUR
- Absence due to long time illness: after four weeks of illness flowers of maximum market value of 45 EUR are sent to the employee

Where no amounts have been specified moderation shall be applied.

Meals during business travel

Meals during business travels shall as a general rule be paid by the employee personally and does not qualify as internal entertainment. The employee is instead entitled to a per diem. Please refer to the OX2 Travel Policy for further information on business travel and per diems. Meals during business travel that qualify as internal entertainment according to the above guidelines are allowed at the cost of OX2.

2.3. External entertainment

External entertainment covers consumption of food and drink and activities with customers and suppliers that is considered as customary hospitality according to regular business practice.

External entertainment may occur in connection to for example:

- Business negotiations
- Marketing and PR

It is specifically important that recurring entertainment to one and the same individual(s) can be motivated by business reasons.

External entertainment shall be made with moderation and without element of excessive luxury.

External entertainment shall also be performed in accordance with the OX2 Policy against corruption. The OX2 Policy against corruption sets out rules regarding giving/receiving gifts and other benefits to/from external parties. It specifically states that OX2 employees shall never give or accept gifts other than gifts of nominal value, open, moderate, and where there is a clear business objective, and it is appropriate for the nature of the business relationship. Gifts with a clear company logo are generally permitted.

Arranging social activities in connection to clients' meetings or other external events can be justifiable provided there is clear business reason, the social activity is a small part of the total program and the total cost for it is kept within reasonable limits. As a general principle OX2 will not carry the cost for customers' or suppliers' travel and accommodation expenses.

Please refer to the OX2 Policy against corruption for more detailed information.

3. Internal training and conferences

Internal trainings and conferences are arranged by OX2 towards its employees to enhance competence, competitiveness, efficiency and wellbeing. Below are the guidelines for internal conferences and internal trainings at the cost of OX2.

Note that OX2 does not pay any per diems if meals are provided at the cost of OX2. Please also refer to the OX2 Travel Policy for more information.

Conferences

- One annual conference when all employees in OX2 are gathered. Presence is compulsory. Absence allowed only after approval from Line Manager.
- One annual Team conference, including one overnight stay, is allowed. Presence is compulsory. Absence allowed only after approval from Line Manager. Amount shall be specified in team budgets per year.

Internal trainings and mindfulness training

- Internal trainings are arranged based on department need. Meals are from time to time allowed at OX2's cost subject to approval from the Line Manager.
- Mindfulness trainings are arranged by OX2 Headquarters. Meals are from time to time allowed at OX2's cost.

4. Required documentation for qualifying expenses

The below information shall be included in the supporting documentation required for the accounting (expense report) and shall be supplied by the employee who has incurred the cost. Expense report templates and more detailed information is posted on the OX2 Intranet under Finance/Expense Reports.

- Date and purpose
- Name of participants, their title or function and the company they represent
- If the entertainment is connected to a specific project, the project number and the project name shall be stated in the expense report.
- For meetings/training/conferences: a detailed timetable showing activities/topics and time spent
- Receipts for the entertainment may be maximum three months old and shall be sent in original for some countries and in digital copies for some countries.