

NTR Responsible Investment Guidelines

Guidelines on Stewardship and Political Engagement

NTR recognises that policy plays a central role in enabling the energy transition. Our approach to political engagement is transparent, non-partisan, and designed to support the development of public policy aligned with sustainability and climate goals.

Our principles include:

- Engaging policymakers only on matters relevant to our sector or the public interest, not for competitive advantage.
- Working primarily through reputable industry bodies (e.g. Wind Energy Ireland) to contribute to consultations and policy forums.
- Complying fully with local laws such as Ireland's Regulation of Lobbying Act 2015, and disclosing direct engagements where required.
- Keeping internal records of any political engagement activity, including communications and purpose.

NTR does not make political donations and adheres strictly to its Anti-Corruption Policy and Political Engagement Policy, which guide all interactions with public officials

Guidelines on Engagement with Other Key Stakeholders

We believe in building lasting relationships with all stakeholders — including local communities, regulators, service providers, and employees — through respectful, transparent, and responsive engagement.

We are committed to:

- Proactive engagement with local communities on planning, development, and ongoing management of our infrastructure assets.
- Encouraging open feedback and enabling safe and confidential reporting of concerns via our Speak Up mechanism.
- Ensuring no retaliation against individuals who raise ethical or operational concerns in good faith.
- Regularly reviewing our practices to ensure stakeholders are heard, and concerns are addressed promptly.

Our internal Speak Up Policy, along with our internal grievance, ESG, and community engagement processes, form the basis of our stakeholder approach.

Guidelines on Managing Conflicts of Interest

NTR is committed to acting with integrity and fairness in all our business dealings. We maintain a robust framework to prevent, identify, and manage conflicts of interest that may arise in the course of our operations or investment decisions.



We uphold the following principles:

- All employees, board members, and relevant third parties must act in the best interests of the company, its investors, and its stakeholders at all times.
- Potential or actual conflicts must be disclosed to executive leadership and assessed transparently.
- All identified conflicts are reviewed, documented, and managed through mitigation measures or recusal, as appropriate.
- Our Conflict of Interest Register ensures accountability and records how each situation is addressed.

These guidelines are underpinned by our internal Conflict of Interest Policy, Fraud Policy, and Anti-Corruption Policy, which collectively promote integrity and ethical conduct across all jurisdictions in which we operate.