

Code of Conduct for Business Partners

of Ekoenergetyka – Polska S.A. Capital Group

Issue 3, 2023

1. About us

Driven by the desire to create innovative solutions and motivated by the aspiration to introduce zero-emission transport, we design and manufacture high-power charging stations for cars, vans, buses and also trucks. We guarantee our customers a safe and stable supply of top-quality vehicle charging stations and comprehensive related services.

We are a pioneer of electromobility and one of the leaders among manufacturers of high-power charging infrastructure in Europe. We contribute to the development of the Polish economy and continuously make every effort to meet this responsibility. We act in accordance with our values and principles. We conduct our business in a transparent manner, complying with generally applicable laws and internal regulations.

At the same time, we strive to constantly increase the value of EEP CG companies. Our priorities are as follows: continuous technological development of our products, reliability of the supply of the offered solutions, technical excellence, provision of comprehensive services of the highest quality to support the process of installation and use of the supplied solutions, as well as efficient and effective organisation and maintenance of equal relations with our partners.

2. Definitions

We would like this document to transmit a clear and straightforward message. For this reason, we have provided the explanation of the terms and abbreviations used herein:

Capital Group - means the parent company together with its subsidiaries and entities in which these entities hold shares, as well as entities related to one other in a manner referred to in the regulations of the Member States issued pursuant to Article 22 of Directive 2013/34/UE of the European Parliament and of the Council of 26 June 2013 *on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC*

Ekoenergetyka - Polska Capital Group (abbreviated as the "EEP CP" or the "Group") - means the Capital Group comprising Ekoenergetyka - Polska S.A. being the parent company with its registered office in Zielona Góra

Code - this Code for Business Partners of Ekoenergetyka - Polska Capital Group, adopted by a resolution of the Management Board of Ekoenergetyka - Polska S.A. with its registered office in Zielona Góra

Business Partner - natural persons, legal persons, or organisational units without legal personality, operating in the public or private sector, with whom the EEP CG has any business relationship. **Business Partners of the EEP CG are, in particular, our contractors, subcontractors, suppliers, consultants, business partners, agents, financial institutions, industry organisations and other entities with which the EEP CG co-operates within its business activity.**

3. Our approach to business

At the **Ekoenergetyka- Polska Capital Group** we believe that every action should be correctly targeted in order to achieve the intended effect. In our business activity, we create new solutions and set directions for development.

Our experience to date has reinforced our conviction that any progress is a resultant of the knowledge possessed by the members of our organisation and compliance with the applicable legal and social standards.

Thus, we have adopted the following key values in our organisation: **Ethics - Education - Progress**. These values guide us on a daily basis, contributing to the development of the technical and intellectual potential of the EEP CG, allowing us to actively participate in the electromobility revolution.

Ethics - Education - Progress are the core values on which we have based our Corporate Social Responsibility strategy focused on human resources, environmental protection and maintaining corporate governance.

4. What do we expect from our business partners?

We are focused on building long-term business relationships, and we expect our Business Partners to **comply** with the key principles of conduct outlined below in relation to areas such as **human potential, the environment and corporate governance in a consistent manner.**

We require from our Business Partners to exercise due diligence to ensure that values and standards specified in this Code are adhered within their own business activities, including in particular their relationships with direct

suppliers. The **EEP CG** also expects Business Partners to take proactive measures aimed at obliging to comply with standards resulting from this Code in their supply chain, outside their direct suppliers.

The **EEP CG** necessitate Business Partners to implement appropriate systems for monitoring compliance with the standards in question and solving situations of possible non-compliance, including by creating appropriate complaint channels, available both inside and outside the organization, ensuring confidentiality of the identity of the reporting person and protection against retaliation.

The Code is an integral part of the agreement regulating economic relations between the companies of the EEP Capital Group and the Business Partner. Where laws and/or local regulations are less restrictive, the principles of this Code apply. In the event that a given requirement results from both the Code, applicable law and/or an agreement with a company of the EEP Capital Group, more stringent provisions providing for the highest protection apply. In cases where there is a direct conflict between applicable local law and the principles expressed in the Code, the provisions of local law will prevail, subject to the Business Partner's obligation to use the best care to respect the intentions of the Code.

“Coming together is a beginning, staying together is progress, and working together is success” –

- Henry Ford

4.1. Human resources

At the **EEP CG**, we believe that it takes more than one person to do amazing things. Care for ensuring satisfactory working conditions remains our priority. Above all, the key to achieving this is the compliance with the following principles:

Respect for applicable human rights, labour laws and ethical principles

Employees of the Business Partner, as well as persons co-operating with the Business Partner, performing work for it and on its behalf, should be treated in an appropriate manner, in compliance with applicable laws and values such as respect, fairness as well as the transferable and non-transferable rights to which every person is entitled, such as the right to property and dignity. Achieving the above objectives requires particular attention to the safety of employees, taking into account compliance with OHS regulations and applicable standards. Business Partners should act in an ethical manner within their business activity, i.e. in compliance with generally applicable laws and the rules of social coexistence.

Zero tolerance of any form of mobbing or discrimination together with the management in line with the postulate of respect for diversity and inclusiveness

We recognise that being responsible and ethical in business categorically excludes unequal treatment based on criteria such as age, gender, disability, nationality, religion, race, political opinion, origin, union membership, sexual orientation, or religion, as well as type of employment. These criteria should be eliminated by Business Partners in recruitment, employment, employment record (promotions, bonuses, training) and termination. The Business Partners should furthermore combat all forms of mobbing and violence in employment and act towards creating a working environment in which all employees feel respected and valued and are able to realise their full potential. . All confirmed cases of human rights violations must be investigated and documented, and appropriate remedial measures must be taken.

The Business Partners should respect the rights of minorities and special groups, including people with disabilities, children, ethnic and religious minorities. The Business Partner shall treat all employees and co-workers equally and shall not exclude them from the community on the basis of gender, age, ethnicity, nationality, religion, disability, trade union membership, political affiliation, sexual orientation, parenthood, hereditary disease, social status, or any other factors unrelated to individual ability to perform the work required at a given position.

The Business Partner is committed to ensuring that its employees are not harassed or discriminated against in any way. The Business Partner shall ensure objective and non-discriminatory criteria in all employment decisions, including recruitment processes (ethical recruitment), remuneration arrangements, access to social benefits, access to training and career development opportunities for employees. Any confirmed cases of discrimination and/or harassment in the workplace must be investigated and documented, and appropriate remedial measures must be applied.

Our ambition is that the Business Partner can monitor, at least on an annual basis, the diversity issues within the company, e.g. in terms of gender, age and nationality distribution of employees or the gender pay ratio by job level, and we consider it good practice for our Business Partners to implement diversity in the workplace by, for example, creating policies to address the gender pay gap, gender balance in management positions or appointing a person responsible for managing diversity issues within the company.

Providing optimum and friendly working conditions that foster individual development of each employee and building a sense of satisfaction and community of action

We expect our Business Partners to respect the fundamental rights of their employees by paying their salaries on time, taking into account the lawful rates of remuneration and the employment costs, mainly those related to social security and taxation, applicable in the respective country.

We also require our Business Partners to comply with all other employment-related legal provisions, in particular those concerning leaves, including maternity and parental leave, working time, childcare and sick leave, and to respect the rights of pregnant women as set out in the relevant country's legislation. In order to ensure optimum and friendly working conditions, we also require our Business Partners to conduct their human resources processes in a transparent manner that is comprehensible manner for the employee, with particular emphasis on the recruitment process and the security measures used in the organization of Business Partners, taking into account both private and public security forces.

Zero tolerance for cases of forced labour and slavery

At the **EEP CG**, we recognise that all forms of coercion inhibit progress. Forced labour, in any form, must not be used by Business Partners, in all countries of their operations. Furthermore, we expect Business Partners to respect the prohibition of any work on their behalf if this would have the appearance of exploitation due to the difficult political or economic situation prevailing in the region, thus forcing persons to work under certain conditions that endanger the health or violate the dignity of the employee, particularly with regards to the prevailing wage rates.

Zero tolerance for the exploitation of child labour

The employment of minors is permitted only in the cases and to the extent stipulated by the law, taking into account the safety for health, life, or mental and physical development as well as respect for the minor's educational obligations. We expect our Business Partners to strictly comply with the law on the employment of minors and to eliminate any cases of unlawful employment of children.

Respecting employees' rights to freedom of association and collective bargaining

Our Business Partners should ensure that the freedom of association and the right to collective bargaining of employees are respected in their business activity. Guaranteeing the above rights contributes to the development of both employees and the organisation. At the same time, it reinforces the feeling of being an

essential part of a larger whole in the employees, and thus strengthens the commitment to improving the organisation's existence and further development.

4.2. Natural environment

As pioneers in the field of electromobility in the **EEP CG**, we believe in the positive impact of our activities on improving the environment and we are focused on protecting it.

Consequently, we expect our Business Partners to adopt a pro-environmental approach in their business activity, manifested in particular in acting in compliance with the following principles:

Respecting generally applicable legal provisions related to the protection of the natural environment mainly in terms of obtaining all types of specific and legally required concessions and permits that are necessary for the conduct of business activities and the related operational and reporting obligations.

Conducting the business activity in a responsible and well thought-out manner, taking into account the procedures for the prevention of environmental risks and at the same time limiting the negative impact on the environment resulting from the conducted business activity. This is inevitably accompanied by rational management of resources such as energy and water, including, in particular, the implementation of energy efficiency solutions, the use of renewable energy, as well as ongoing monitoring of water quality, consumption and greenhouse gas emissions. In addition, we expect our Business Partners to be committed to decarbonisation, air quality protection and responsible chemicals management.

We require our Business Partners to take a responsible approach to running a business, oriented towards respecting the right to land, forest and water, and counteracting forced evictions through sustainable resource management, including care for: soil quality, animal welfare, reducing noise emissions, maintaining biodiversity and proper land use and rational deforestation.

Optimisation and minimisation of the amount of waste generated in the course of business activity and taking real action to reduce emissions in connection with the operations, in particular by reducing waste production and implementing reuse and recycling solutions within the organisation. In order to reduce the negative impact on the surrounding environment, it is necessary to ensure openness to state-of-the-art technologies and to manage in accordance with the principle of efficiency.

Having an environmental policy within the organisation that enables to identify, in a systemic and structural manner, the negative impact on the various elements of the environment and to manage the company's business activity in such a way as to minimise this impact.

4.3. Corporate governance

At the **EEP CG**, we recognise that it all starts with ourselves, and that the implementation of an effective management system, particularly one aimed at maintaining compliance in the broadest sense, is the foundation for the proper functioning of the organisation. Consequently, we expect our Business Partners to adopt a similar approach in their business activity, manifested in particular in acting in compliance with the following principles:

Conducting business activity on the basis of and in compliance with generally applicable laws and principles of social coexistence

Our Business Partners should act ethically, i.e. in compliance with all legal provisions and regulations applicable to their business activities as well as the generally recognised and applicable principles of social coexistence. This compliance should be directed in particular towards the prevention of money laundering, terrorist financing and tax fraud. We expect Business Partners to exercise due diligence in identifying compliance risks and to implement appropriate security measures to minimise them. We also require our Business Partners to comply with export restrictions and economic sanctions.

Compliance with the principles of fair competition. Prohibition of abusing a dominant market position

Corporate activities should be geared towards compliance with fair competition and antitrust laws. Compliance with regulations in the aforementioned areas determines the maintenance of a level playing field on the market, benefiting both entrepreneurs and consumers. We expect our Business Partners to avoid any activities contrary to the legal order in this area, in particular participation in price collusions, dumping prices, unfair advertising, misrepresentation of the origin of products, their ownership and designation, violation of business secrets, intellectual property and industrial property rights, as well any activities bearing the hallmarks of abuse of a dominant market position, including through the use of unfair pricing or commercial terms.

Data protection and safety

Awareness of the value of the information held, particularly that shared in the context of a business relationships, requires the organisation to implement appropriate protection and security measures in this regard. Our Business Partners should exercise due diligence to ensure that any information made available to them within the framework of the relationship is obtained, used, and processed in accordance with applicable legal provisions. Business Partners should furthermore ensure due and effective protection of the information and data provided to them, in particular information and data of a confidential nature or considered to be legally protected secrets. Business Partners should also comply with regulations and requirements related to the protection of intellectual property rights and eliminate and prevent abuses in this regard in their business activity.

Avoiding conflict of interest

Maintaining objectivity in business activities should be a priority for every organisation, resulting in the obligation to identify risks of conflict of interest both inside and outside the organisation and to implement appropriate countermeasures in this context. The Business Partners are expected to apply measures to prevent conflicts of interest. This includes, in particular, the obligation to inform, with sufficient advance, whenever they accept an assignment or participate in any procedure where the interests of the EEP Group's Business Partners are in conflict with those of the Group, taking into account both the Partners and their equity-related entities.

Zero tolerance for corrupt behaviour, in particular that which bears the hallmarks of bribery, fixing or paid patronage

Conducting the business activity in a responsible and ethical manner excludes the possibility of practices involving, in particular, the disruption of public tenders, unlawful influence, damage to business or other fraud. It remains unacceptable to directly offer and/or accept any benefit or make any promise (in particular of money), in return for a specific act or omission. We expect the Business Partners of the EEP CG to be intolerant of all corrupt practices and to fully eliminate them from their activities. These practices include, in particular: unlawfully influencing the activities of officials, offering, promising or giving persons who perform public functions undue and unlawful advantages in the broad sense of the word, also in exchange for mediation in the settlement of a given matter (irrespective of whether the provision of the said advantages takes place personally or through any third parties). In addition, the acceptance and offering of gifts in relations with the Business Partners must be in compliance with the laws, customs and standards in force on the relevant market and remain disinterested and irrelevant to the business relationship.

Having tools ensuring the detection of non-compliance

An indispensable element of an effective management system is the creation of mechanisms allowing for the ongoing monitoring of the correct operation of individual processes in the organisation, including an effective whistleblowing system allowing for the signalling of inconsistencies to both members of the organisation and other stakeholders. We expect our Business Partners to implement adequate solutions to ensure adequate protection, in particular with regards to the identity of the notifying persons, the information provided and retaliation measures.

5. Ensuring compliance

Adherence to the principles of conduct outlined above in the conducted business activity remains an essential condition for the **EEP CG** companies to establish relationships with the Business Partners.

The **EEP CG** verifies compliance by Business Partners with the rules and standards set out in the Code. Therefore, the EEP Capital Group companies expect Business Partners to submit a statement with the content indicated in the Appendix to the Code, and also request Business Partners to provide relevant, reliable information using the KYC form - in accordance with the internal procedures applicable in the EEP CG.

At the same time, the **EEP CG** reserves the right to carry out an on-site audit, at any time, by EEP CG employees or by an independent third party appointed by the EEP Capital Group.

6. Notification of non-compliance

The **EEP CG** has a whistleblowing system implemented to notify and eliminate any irregularities or violations within the Group's activities. Any information on suspected or actual incidents of non-compliance with the law, with the internal regulations of the EEP CG or with the principles of social coexistence shall be notified. The notifications may refer, in particular, to incidents that may involve the violation of the principles described in the Code.

Any person who becomes aware of a possible irregularity concerning a company of the EEP CG, in particular an employee, a collaborator, a consultant, a supplier, a contractor, a customer, as well as an end-user of products and services offered by Group companies, is entitled to make a notification.

If you notice any irregularity, in particular one that constitutes a breach of legal provisions (including generally applicable standards and regulatory guidelines) or of the internal regulations of the EEP CG, or of the principles of social coexistence, **please inform us using the communication channels indicated below:**

✍ in writing:

EKOENERGETYKA – POLSKA S.A.
ul. Nowy Kisielin - Rozwojowa 7A

66-002 Zielona Góra

with the reference "NOTIFICATIONS".

✉ by mail:

zgloszenia@ekoenergetyka.com.pl

📄 using the form on the website:

<https://ekoenergetyka.com.pl/pl/kontakt/>

We ensure the confidentiality of the information provided

7. Non-compliance - and what next?

The EEP CG makes every effort to ensure the long-term cooperation with its Business Partners. In the event of violation of the principles set out in the Code, we allow for the possibility of implementing appropriate actions within a reasonable period of time, being the corrective actions, if you are willing to remedy the violation with our support.

We expect Business Partners to take immediate corrective and investigative action when they notice or become aware of, or suspect any non-compliance with the principles set out in the Code.

In the event of material breaches of the Code in relation to the nature and scale of the breach and the resulting risk, we reserve the right to take appropriate action against Business Partners, up to and including the termination of co-operation.

Please submit any questions regarding the interpretation of this Code in the form of e-mail correspondence to the following address: compliance@ekoenergetyka.com.pl

Appendix to
the Code for Business Partners of Ekoenergetyka

.....
(name/company of the Business Partner)

.....
(place, date)

.....
(Business Partner's address)

.....
(Business Partner's tax identify number)

.....
.....
(name and address of the EEP CG company with
which cooperation is established)

STATEMENT

On behalf of the Business Partner, I declare that I have read the Code of Conduct for Business Partners of the Ekoenergetyka-Polska S.A. Capital Group and I undertake to abide by the values and principles contained therein.

.....
(signature of the Business Partner or an authorized person)