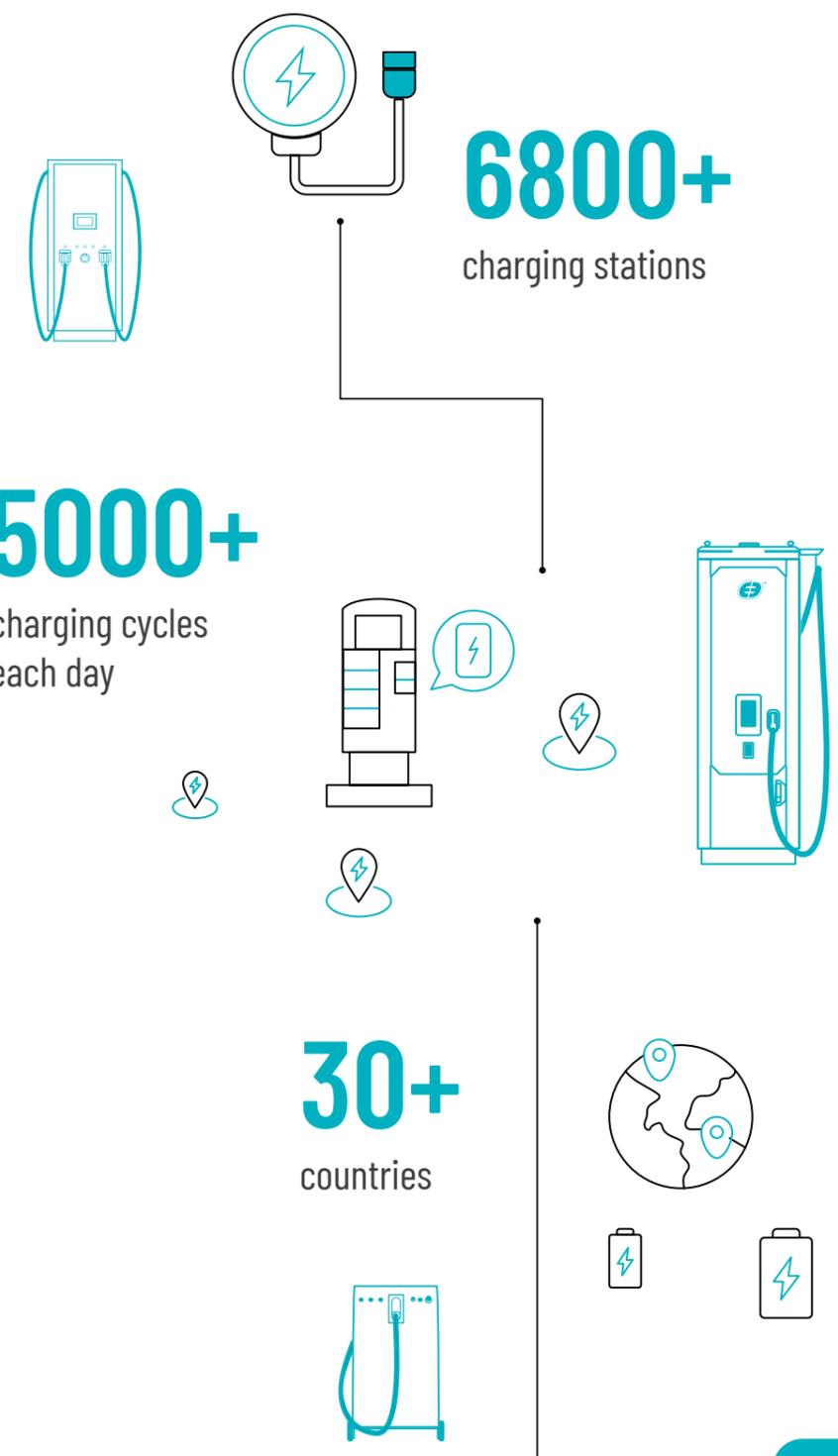


CODE OF CONDUCT

OF EKOENERGETYKA - POLSKA GROUP

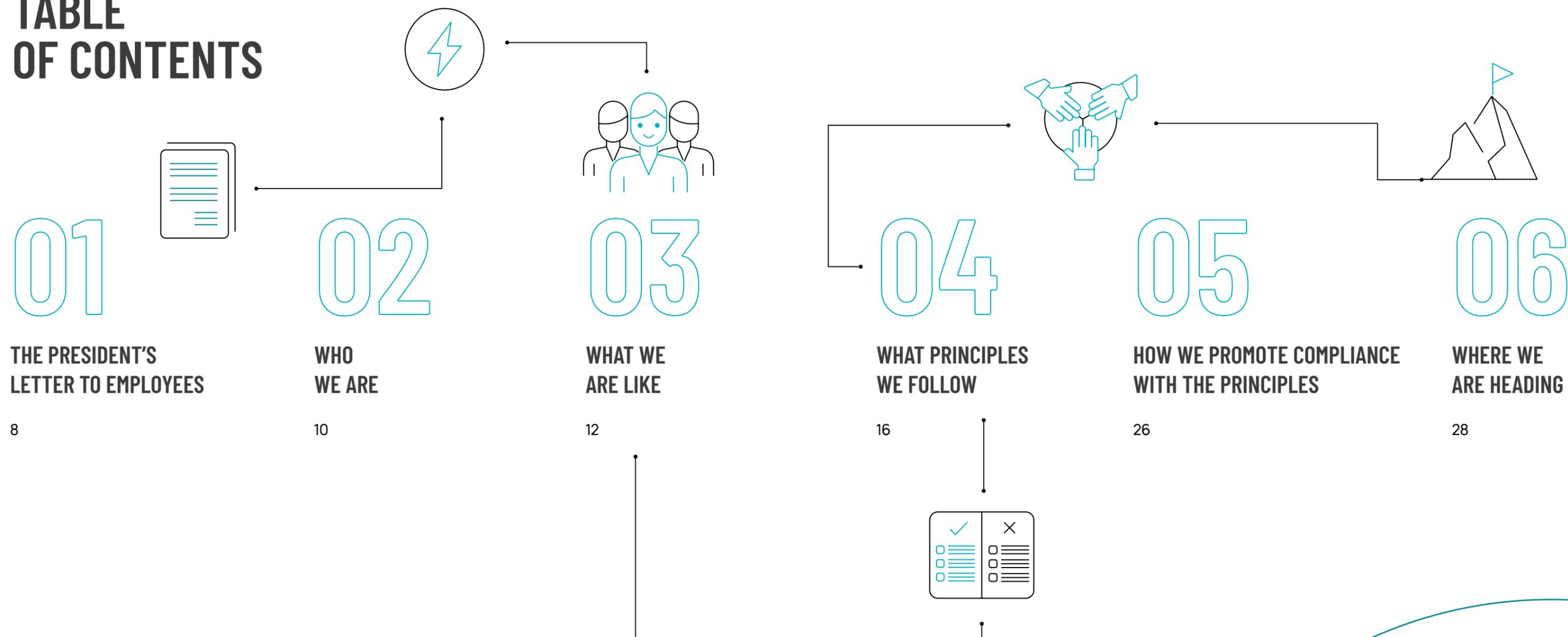


POWER THAT
MOVES YOU



SEE OUR PRODUCTS

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POWER THAT
MOVES YOU

01



ETHICS

We act ethically, honestly and transparently and in accordance with the law, the Group's internal regulations and the rules of social conduct.



WHAT MOVES OUR COMPANY



EDUCATION

We continuously expand our knowledge and improve our competences. This allows us to develop ourselves and improve the quality of the solutions we offer to our customers in order to respond even more accurately to their needs.



PROGRESS

The strive for progress has accompanied us since the very beginning of the Organization and it motivates us to create innovative solutions that promote sustainable development and support care for the environment.



POWER THAT
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DEAR COLLEAGUES,

When Ekoenergetyka - Polska S.A. started its business activity in 2009, the e-mobility industry in Poland was practically non-existent. Today, with the increasing importance of zero-emission transport, we are not only a pioneer, but also one of the leaders of the e-mobility revolution on a global scale.

Ekoenergetyka-Polska Group is not only about leading technology, but first and foremost about the people who form its very core. Your work, attitudes and skills and competencies determine the success of the entire Group. We owe our success to your commitment and passion for innovative solutions. Thanks to you Ekoenergetyka-Polska Group has been co-creating the e-mobility industry worldwide and changing global transport into a more environmentally friendly one.

I have always wanted to create a stable and sustainable company, operating on the basis of shared values and acting with care for employees and the environment. Thanks to your commitment, Ekoenergetyka-Polska Group is just such an organisation.

I have the pleasure to present to you our common Code of Conduct of the Ekoenergetyka-Polska Group. It defines the values and the resulting principles that are the foundation of our organisational culture.

The Code can also serve as a tool to help us make decisions in difficult and unclear situations. The aim of this Code is to promote and support ethical action and to develop an organisational culture based on respect for people and the nature around us. By following the principles described in the Code, we create an honest and reliable business and support our image as a trustworthy partner.

Our Group's core values are ETHICS, EDUCATION and PROGRESS. They enable us to conduct and develop our business, contribute to economic development, and have a positive impact on society and the environment.

I believe that cultivating our values and adhering to the principles described in the Code is the key to achieving long-term success, ensuring the quality of our products and services and building lasting relationships with our partners, based on respect, trust and acting for the common good.

Thank you for your work, commitment, determination and effort. You make it possible for us as a Team to achieve ambitious goals and to set ourselves new and even more ambitious challenges. We are the pioneers of e-mobility. Our power is moving the world, but also changing it for the better.



Bartosz Kubik

The Co-founder and the President of the Management Board
of EKOENERGETYKA - POLSKA S.A.

POWER THAT
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02



WHO WE ARE?



WHO WE ARE?

We are the pioneers of e-mobility and the leaders in this industry, providing charging stations for cars, vans, buses and trucks since 2009. We base our success and potential on people, their experience, competence, attention to quality and mutual trust.

We are driven by the desire to create our own innovative technology, applied in everyday life, and the desire to be part of a global environmental and power transformation supporting SUSTAINABLE DEVELOPMENT.

We design and offer state-of-the-art solutions - high power charging stations designed for every type of vehicles - from zero-emission passenger cars, to environmentally friendly heavy transport, up to efficient buses for sustainable urban transport, and even boats.

We employ highly skilled specialists in design, engineering, power electronics, electronics, software development, IT solutions and many other fields. We design and manufacture our products in Poland and deliver them, together with comprehensive maintenance services, to customers all over the world.

Our strategy assumes continuous development of our own technology and the increase of our participation in the global e-mobility revolution.

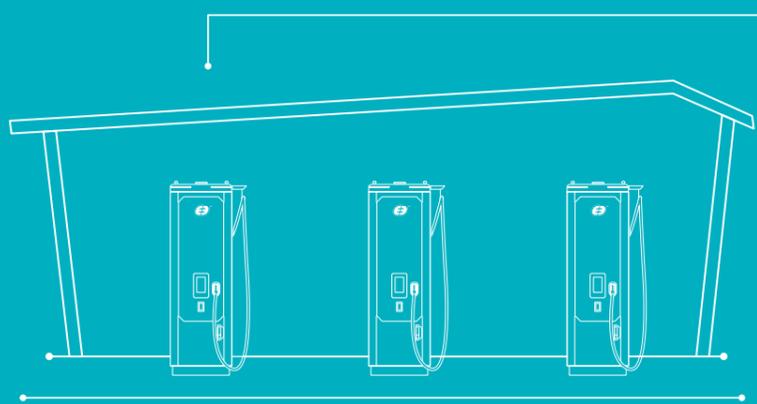
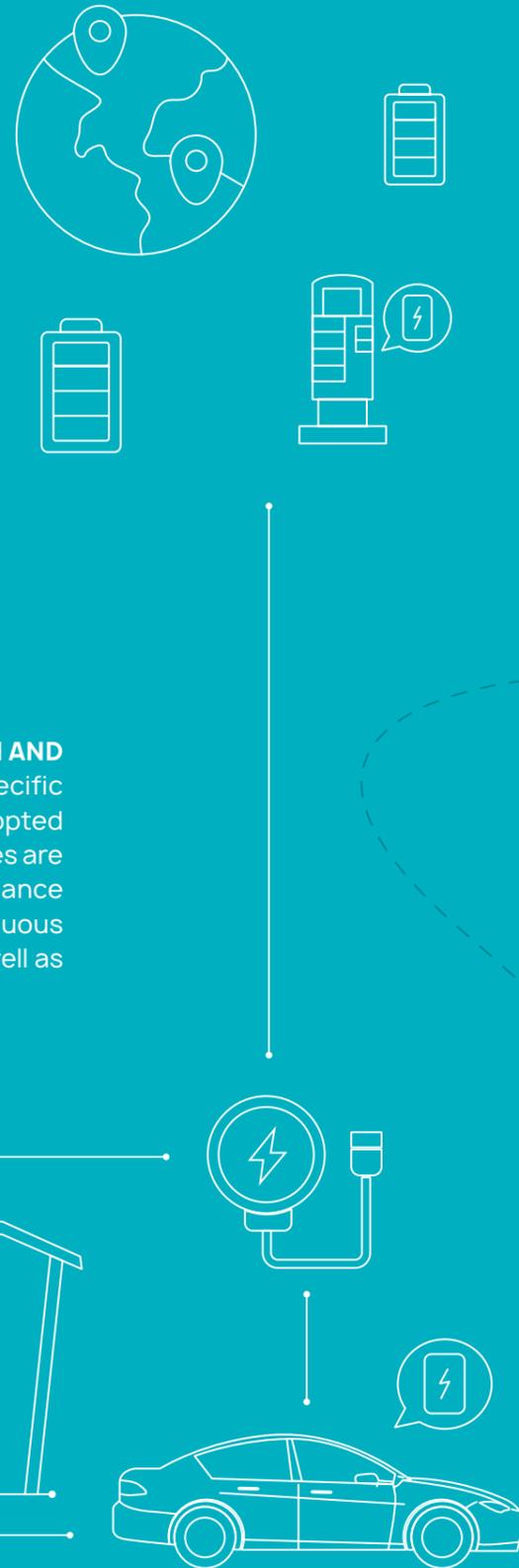
We strive to PROGRESS by constantly developing our technical and intellectual potential. We EDUCATE the public on solutions that favour efficient and environmentally friendly solutions. We follow the principles of ETHICS, contributing to the development that balances economic, social and environmental issues.

POWER THAT
MOVES YOU

03

WHAT ARE WE LIKE?

We COMPLY with our key values: **ETHICS, EDUCATION AND PROGRESS**. These values form the basis for the specific PRINCIPLES OF CONDUCT that guide us. We have adopted SOLUTIONS in our Group to ensure that these principles are respected. Our values accompany us in the performance of our daily duties and they contribute to the continuous DEVELOPMENT of Ekoenergetyka - Polska Group as well as strengthen our organisational culture.



POWER THAT
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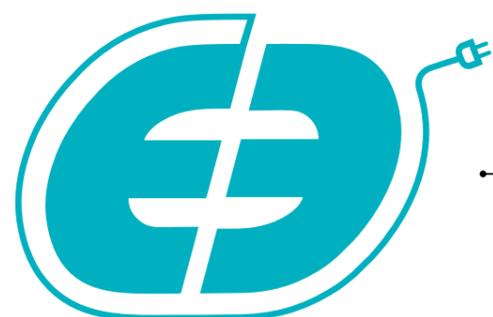
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ETYKA [ETHICS]

We act ethically - honestly and transparently and in accordance with:

- national and international law
- the Group's internal regulations
- the principles of social conduct

We also express our responsibility by:

- clarifying doubts as soon as they arise
- zero tolerance for fraud and its rigorous elimination.

EDUKACJA [EDUCATION]

With our approach to the value represented by education, we are constantly expanding our knowledge and improving our competence. This allows us to develop ourselves and improve the quality of the solutions we offer to our customers in order to respond even more accurately to their needs.

We believe in what we do and are constantly building public awareness of e-mobility and environmentally friendly transport through:

- training initiatives
- educational activities
- support for professional organisations

POSTĘP [PROGRESS]

The strive for progress has accompanied us since the beginning of our Organisation. We are constantly motivated to create innovative solutions that promote sustainable development and support care for the environment.

We also influence the development of others - we are a partner to local communities, implementing and supporting projects that improve the quality of life of their members.

POWER THAT
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04

WHAT PRINCIPLES DO WE FOLLOW?



FRIENDLY WORKING ENVIRONMENT

We create and support a friendly working atmosphere based on respect, assistance, trust, as well as open and transparent communication. We build a culture of co-operation, dialogue and knowledge sharing, believing that this strengthens our sense of commitment and contributes to the development of the entire organisation. We do not accept and absolutely

prohibit unlawful and unethical behaviour such as bullying, violence and threats of violence, intimidation, repression and harassment. When providing public or private security forces, we strive to ensure that all security measures are adequate for the purpose of use and in accordance with the law in particular with full respect for human rights.

EQUAL TREATMENT IN EMPLOYMENT AND NON-DISCRIMINATION

We ensure equal treatment of employees in employment, in particular in recruitment, establishment and termination of employment, terms and conditions of employment, career paths, promotions and access to training. We do not accept and strictly prohibit all forms of discrimination (direct and indirect) in particular on the grounds of age, gender, parenthood, disability, national or social origin, religion, racial and ethnic origin, skin colour, political opinion, union membership, sexual orientation and gender identity. We also exclude all other forms of discrimination covered by national or international law. We attach particular importance to the principle of equal treatment in the employment of men and women. We respect the rights of minorities and social groups with special needs, people with disabilities, children, the elderly, ethnic and religious minorities, and also local and indigenous communities. We actively work towards equality and against the discrimination in employment, eliminating and combating any potential infringements in this area and promoting appropriate practices among our employees and business partners.

CARE FOR OCCUPATIONAL SAFETY

We provide a safe and healthy working environment for our employees, and for everyone on our premises. We ensure the appropriate training and required personal protective equipment. We strictly adhere to safety rules, regulations and procedures, and each employee, regardless of his or her position, is entitled to raise a concern if a deviation is noticed. As part of our concern for safety, we use company vehicles sensibly and in accordance with regulations.

OBSERVANCE OF HUMAN RIGHTS

We absolutely respect and promote the protection of human rights as set out in universally adopted international documents. Our conduct is guided by a commitment to principles such as respect, fairness and observance of every person's alienable and inalienable rights, including the right to freedom, security, dignity and property. We support freedom of association and the right of employees to collective bargaining. Our employees can openly communicate with the management and share ideas and concerns about working conditions and management practices without fear of discrimination, retaliation, intimidation or harassment. We do not accept any form of slavery, forced labour or illegal child labour. We ensure that employees' rights are protected and respected in accordance with applicable laws and ethical principles.

RESPECT FOR DIVERSITY

We operate on a global scale and respect the distinctiveness of cultures and customs adopted in different parts of the world. We work towards creating a working environment in which all employees feel respected and valued. We recognise and accept the distinctiveness of individuals, providing an environment where all employees can realise their individual potential. We create initiatives dedicated to different social groups and we believe that the personal differences resulting from different life experiences and perspectives can be used in the interest of our organisation.



TRANSPARENT HR POLICY

We follow a transparent HR policy based on clear and transparent principles in the scope of recruitment, employment, remuneration and bonuses of employees, as well as access to training and other forms of vocational training. We 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. We create consistent procedures and processes for human capital management, thus ensuring high standards of conduct in this area.

INNOVATIVENESS

We create our own technology, which is among the most innovative solutions on the market and can be used in everyday life all over the world. We are oriented towards the continuous improvement of our products and services and the creation of new solutions. We strive to anticipate our customers' needs while respecting the postulate of sustainable development. We continually invest in creating the right environment for research and development, providing the highest quality testing and measurement equipment. We also listen to the needs of the Company and its employees and analyse the requests made, so that together we can work out increasingly better conditions for our organisation - now and for future generations.

PROFESSIONALISM AND ACCOUNTABILITY FOR RESOURCES

Our work is guided by the principle of professionalism. We carry out the duties and tasks entrusted to us responsibly and effectively, with due diligence and commitment, bearing in mind the interests of the entire organisation. We pay attention to continuous professional development and broadening of knowledge by learning from each other and by creating and supporting vocational training initiatives. We handle the resources made available to us by our employer or business partners responsibly, using them with due care and in accordance with the law and their intended use.

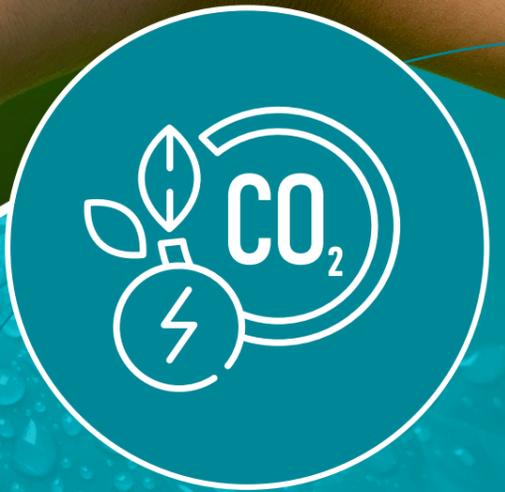
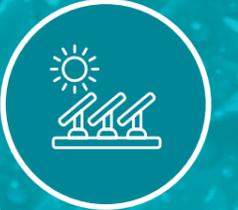
A green future with Ekoenergetyka

QUALITY AND A SUSTAINABLE SUPPLY CHAIN

Our priorities are the highest quality of the products and services offered and ensuring reliable deliveries. We develop and deliver solutions designed in accordance with applicable regulations and standards, as well as the highest safety standards. When establishing business relationships, we demand the same approach from our partners, especially our suppliers. We require and verify compliance with the applicable laws, standards and guidelines that set out the principles of protection of human rights and freedoms, care for the environment and ethical business conduct. Each of our partners is obliged to comply with the specific principles set out in our Business Partner Code. Thanks to our technical excellence and our state-of-the-art products and services to ensure the electrification of transport, we are an essential part of a sustainable economy and our business contributes to stable development in the interests of present and future generations.

CARE FOR THE ENVIRONMENT

As pioneers in the field of e-mobility, we are guided by both the principle of respect for the environment and its resources and the individual's rights to land, forests and water. We protect the environment in our daily operations, guided by the principles of precaution, preventive action and elimination of pollution at source. We strictly comply with environmental regulations and meet all requirements for permits, registration approvals and concessions and the resulting operational and reporting obligations. We identify, assess and remediate our significant impacts and risks in relation to the environment. In particular, we pay attention to mitigation and adaptation to climate change, combating pollution, rational use of water and raw materials and protecting biodiversity. We are also working towards implementing solutions in line with the functioning of a circular economy. We have set out detailed principles of our environmental care in a separate Environmental Protection Policy.





CARE FOR THE CUSTOMERS

We are determined to provide solutions that best meet our customers' expectations. We aim to build long-term business relationships based on mutual respect and trust. We consciously and attentively listen to the needs of our existing and potential customers, because our success depends on it. We are open to continuous development and improvement of the products and services we offer.

FINANCIAL ACCOUNTABILITY

We take care to keep accurate and reliable bookkeeping entries, in particular we properly account for income and expenses.

We respect the applicable tax laws by correctly and timely fulfilling all public and legal obligations.

CONFLICT OF INTEREST

In our work and in our business relations we are guided by the principle of objectivity. We identify risks associated with the occurrence of conflicts of interest both inside and outside the organisation and implement appropriate countermeasures. All employees have an obligation to inform their immediate superior or the Chief Compliance Officer, with sufficient advance, of a potential conflict of interest, or the possibility thereof. All employees have an obligation to avoid situations and activities that could qualify as being conducted under conditions of conflict of interest.

GIFTS AND BENEFITS

The acceptance and offering of gifts, or other benefits by employees in connection with the performance of their duties, shall be carried out in accordance with the law and the internal regulations in force in this regard. The acceptance and offering of gifts and other benefits in business relationships should remain gratuitous and irrelevant to those relationships, while conforming to the customs and standards of the relevant market. In particular, it is not allowed to accept or offer a gift if this creates an obligation, an expectation of reciprocity or unlawful preferential treatment.

VERIFICATION OF COUNTERPARTIES

We establish transparent business relationships based on the highest ethical standards. We work with business partners who comply with the law and share our values and principles. Compliance with the law, values and principles guarantees the building of sound relationships, ensures transparency and perpetuates mutual credibility. At the same time, we believe that adherence to these principles contributes to the quality of the products and services we offer. We analyse the risk and verify our partners, in particular suppliers, in compliance with the principles set out in the Business Partner Code. We give priority to and treat with due diligence the obligation to prevent money laundering, the financing of terrorist activities and the prevention of tax fraud. We comply with economic sanctions and export restrictions imposed by international and domestic law. We implement and strictly apply procedures (KYC and others) and other mechanisms to ensure compliance and regularity in this regard.

COMBATING AND RESPONDING TO ABUSE

We conduct our business in a responsible and ethical manner, in compliance with the law, internal regulations and principles of social conduct. We also act consistently with the guidelines and business standards applicable to our organisation. We do not accept and we eliminate all cases of irregularities and abuse. We act transparently and openly - everyone should respond to irregularities they notice by reporting them to their immediate superior, the Chief Compliance Officer or through a channel that ensures anonymity. We apply and develop preventive measures aimed at ensuring protection against fraud. We follow response procedures and encourage open communication on risks and irregularities, ensuring protection against retaliation.



 **FAIR COMPETITION**

We comply with the principles of fair competition, acting in accordance with prevailing market standards and established good practice. We follow the Group's established procurement procedures when working with suppliers. We comply with antitrust laws, in particular, we do not engage in price-fixing, we do not use dumping prices, we do not engage in

unfair advertising and we do not provide misleading information on the origin of our products, their ownership or designation. We do not violate business secrets, intellectual property or industrial property rights. We do not abuse our dominant market position, including by applying unfair pricing or commercial terms.

 **COUNTERACTING CORRUPTION**

We have zero tolerance towards corruption or any practice that may bear the hallmarks of corrupt behaviour, in particular pay-offs, bribery or paid patronage. We actively counteract corruption in all its forms and eliminate any practices that may bear its hallmarks. We comply with the organisation's procedures for reporting potential cases of corruption and implement mechanisms to prevent such cases.

 **CONFIDENTIALITY AND INFORMATION PROTECTION**

We protect and appropriately safeguard information related to the Group, employees and business partners, especially that which constitutes trade, business, industrial or other types of protected information. We obtain, use and process all information within the framework of business co-operation in accordance with the law and ethical principles. We have and continuously improve procedures and technical solutions in the scope of information security, cyber security and data protection. The obligation to maintain confidentiality of legally protected information does not exempt us from the principle of transparent business conduct and the obligation to communicate openly with the environment.



05

HOW DO WE PROMOTE COMPLIANCE WITH THE PRINCIPLES?

One of the pillars of the organisational governance of Ekoenergetyka-Polska Group is a comprehensive approach to the issue of compliance - the COMPLIANCE MANAGEMENT SYSTEM. The systemic approach supports both the Group's EMPLOYEES and BUSINESS

PARTNERS with whom we work, in complying with the laws, internal regulations and rules of social conduct, respectively. With this approach, we actively ensure compliant conduct in all areas of our business.

01

WE MANAGE

Compliance is part of management of our current and future business areas. We take measures to ensure compliant conduct and to eliminate infringements.

02

WE CLARIFY

We analyse and clarify concerns with a view to the continuous improvement of the Organisation. We develop internal mechanisms to manage whistleblowing.

03

WE EDUCATE

We undertake educational activities that support the development of organisational knowledge and ethical awareness both inside and outside the Group.

POWER THAT
MOVES YOU

DO YOU WANT TO KNOW
WHETHER A CERTAIN BEHAVIOUR
IS RIGHT?

ARE YOU IN DOUBT
HOW TO PROCEED?

ASK YOUR CHIEF COMPLIANCE OFFICER!
compliance@ekoenergetyka.com.pl



HAVE YOU WITNESSED
AN INFRINGEMENT?



TAKE ACTION!

Any cases of irregularities or violations within Ekoenergetyka-Polska Group can be communicated through the internal channels of the INFRINGEMENT REPORTING SYSTEM, respecting the respective principles of confidentiality and anonymity. Available forms:

 in writing: **EKOENERGETYKA - POLSKA S.A.**
Pełnomocnik ds. Compliance
ul. Nowy Kisielin - Rozwojowa 7A,
66-002 Zielona Góra

 by e-mail at: **compliance@ekoenergetyka.com.pl**

 using the form: **<https://ekoenergetyka.com.pl/notices/>**

06

WHERE ARE WE HEADING?

We aim to maintain our position as a GLOBAL LEADER in innovation and new technologies for sustainable and intelligent mobility. We set ourselves AMBITIOUS OBJECTIVES and ETHICAL STANDARDS. Maintaining our direction is possible through COMPLIANCE with the applicable law, regulations and internal procedures as well as the principles of social conduct. We believe that this is not only the right approach, but also our duty and a huge RESPONSIBILITY towards sustainable development.

Maintaining the right course of action is guaranteed by a COMPASS represented by our values: ETHICS, EDUCATION, PROGRESS. These are the values that have guided our actions for years and have been reflected in our RELATIONSHIPS with employees, business partners, local communities and the broadly understood ENVIRONMENT.

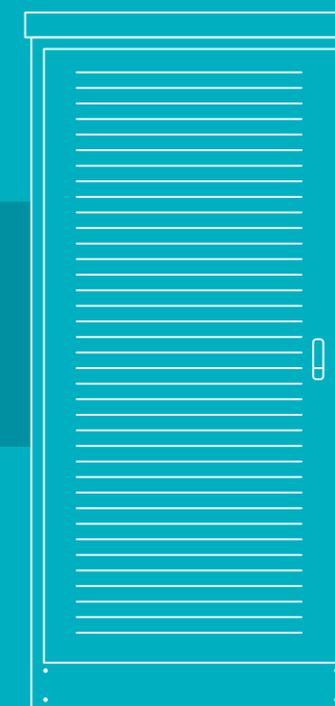
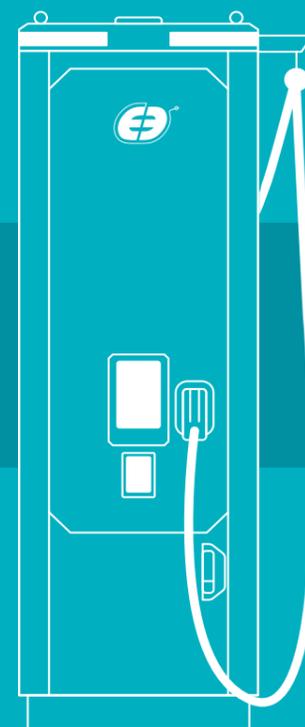
We build our competitive advantage in a SUSTAINABLE way. We act in the interest of our planet and future generations. We provide INNOVATIVE and responsive products that are continually improved. In this way, we are part of the ECOLOGICAL TRANSFORMATION. As a RESPONSIBLE employer and partner, we develop our business while striving to respond to social challenges. We have developed and implemented numerous INITIATIVES in the interest of members of our immediate environment. We support and create EDUCATIONAL PROJECTS in the form of intern-

ships, training courses, lectures and knowledge competitions that reach Young Talent in our region. In this way, we awaken the PASSION for e-mobility in the next generations.

We have created a unique place on the map of the Industrial and Technological Park of the Lubuskie Province - the Ekolucky Nursery and Kindergarten, which SHAPES the awareness of our employees' children in the spirit of ecology and sustainable technologies. The EKOENERGETYKA FOUNDATION, established in 2020, is a consolidation of the philanthropic and charitable activities carried out to date, as well as an expression of our accountability towards the COMMUNITY in which we operate. As the Foundation, we carry out CHARITABLE activities, undertaking and strengthening research and teaching, health, sports, pedagogical and educational initiatives. We collaborate with local government units and professional organisations to promote, build and strengthen social awareness of e-mobility.

Our activities are a source of pride for us and a motivator for further IMPROVEMENT of our organisation. The idea of striving for perfection present at each stage of our activities enables us to play an important role in society and contribute to a POSITIVE change. Continuous improvement drives us to GROW and create a better future for our organisation, our people, our community and the environment in which we operate.





SATELLITE
SAT 600 HPC

POWER UNIT
AXON SIDE



If you have any questions or concerns regarding the application of the provisions of this Code, please contact the Group's Chief Compliance Officer
EKOENERGETYKA-POLSKA

address:
ul. Nowy Kisielin - Rozwojowa 7A,
66-002 Zielona Góra
e-mail: compliance@ekoenergetyka.com.pl

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Ekoenergetyka - Polska S.A.

ul. Nowy Kisielin - Rozwojowa 7A,
66 - 002 Zielona Góra

National Court Register No.: 0000846229

Tax ID no.: 9731013938

Statistical No.: 081115853

www.ekoenergetyka.com