

CODE OF CONDUCT

of the ENERPARC Group

FOR BUSINESS PARTNERS

FOREWORD OF THE EXECUTIVE BOARD

We are proud to generate “green” energy with our photovoltaic systems and thus make an active contribution to climate protection.

In recent years, ENERPARC has developed from a small start-up company in Hamburg into a large, internationally active group of companies. Linked to our constant growth is the need for change: Our future success depends to a large extent on revamping and digitising our processes in order to be able to work efficiently. At the same time, it is necessary that we continue to comply with applicable laws and our internal policies. The changes in our work structures present us with new challenges every day compelling us to make the right decisions and do the right thing.

This ENERPARC Code of Conduct summarises our internal company principles and is intended to serve as a guide for your decisions and actions.

The observance and implementation of the Code of Conduct is of particular importance to all of us, please take the time to read this Code of Conduct carefully and internalise it. Seek advice if you have questions. So that together we can lead the transformation of our growing organisation to success.

Thank you very much for your support.

A handwritten signature in blue ink, appearing to read 'C. Koeppen', with a long horizontal stroke extending to the right.

Christoph Koeppen
Chief Executive Officer

A handwritten signature in blue ink, appearing to read 'F. Müllejans', with a long horizontal stroke extending to the right.

Frank Müllejans
Chief Financial Officer

A handwritten signature in blue ink, appearing to read 'S. Müller', with a long horizontal stroke extending to the right.

Stefan Müller
Chief Operating Officer

INTRODUCTION

→ **Why do we have a Code of Conduct?**

Our aim is to comply with applicable laws and our internal policies in our work at ENERPARC. Where such laws or internal policies do not exist, the Code of Conduct serves as a guide for ethically correct and responsible business behaviour.

Furthermore, this Code of Conduct is intended to define our company's basic sustainability requirements.

→ **What is the basis of our Code of Conduct?**

As a company, we are guided by the ten principles of the United Nations Global Compact (www.unglobalcompact.org), which reflect internationally recognised fundamental responsibilities in the areas of human rights, labour, the environment, and anti-corruption. This Code of Conduct has been prepared in accordance with these principles.

→ **Who must follow the Code of Conduct?**

We are all committed to taking responsibility for our actions and doing the right thing when acting on behalf of the ENERPARC Group. This Code of Conduct therefore applies to every subsidiary and affiliate and to every employee of the ENERPARC Group – without exception.

We also expect all external third parties who work with us to comply with this Code of Conduct.

→ **What happens if I do not comply with the Code of Conduct?**

In the event of a violation of the Code of Conduct, the respective employee must expect measures under labour law, up to and including notice of termination of the work contract. If the violation of the Code of Conduct is also a violation of the law, there is also the threat of fines, claims for damages or even criminal consequences.

→ **What do I do if I notice an infringement by someone else?**

We want breaches to be reported to us. This is important so that we can prevent damage to ENERPARC, our employees and our reputation. You can contact your manager directly or use our web-based reporting system, the “ENERPARC Hintbox”, for your report. The “ENERPARC Hintbox” is available to all ENERPARC employees in Europe.

→ **How do I behave properly when I am unsure about my actions?**

No Code of Conduct answers all questions and therefore the ENERPARC Code of Conduct does not claim to be exhaustive. Your gut feeling and judgement are always required. If you have any doubts about whether your behaviour is in line with our Code of Conduct, you can always talk to your manager about it or seek advice directly from the legal department – in person, by phone or by e-mail (compliance@enerparc.com).

OUR CORPORATE PRINCIPLES AT A GLANCE



**Responsibility for
the environment**



**No corruption
and bribery**



Fair competition



**Human rights and
fair working conditions**



**Safe and healthy
workplace**



**Data protection
and confidentiality**



Respectful treatment



Financial integrity



No corruption or bribery

Corrupt behaviour or bribery is not tolerated at ENERPARC.

What we do:

- We never offer, hand over or accept bribes or kickbacks, even if they are offered to us by external third parties.
- We do not hand over gifts – no matter how big or small – if they are intended to make the recipient do something in return.
- With regard to government or community representatives who have to comply with particularly high standards, we additionally observe the special provisions that may apply due to local laws.
- We disclose conflicts of interest that may arise between our private interests and ENERPARC's interests where these may potentially influence our business decisions.



Fair competition

The basis of our business relations is free and fair competition. We do not use unfair business methods and act in particular in accordance with competition and antitrust law.

What we do:

- We never discuss sensitive topics such as prices, sales conditions, sales volumes or share customer data with external third parties.
- We openly identify ourselves as ENERPARC employees and are prudent in our communication with competitors – especially at informal meetings (e.g. in the context of association events).
- We never agree with competitors on market segmentation or on excluding certain other competitors.
- We avoid any behaviour that can be considered as manipulation of a tender or bidding process.



Safe and healthy workplace

Health and safety at work is our top priority. We act proactively to prevent accidents and occupational illnesses. We provide our employees with an ergonomic and work-friendly environment.

What we do:

- We report safety concerns, near misses, work-related injuries, or illnesses.
- We train and inform our employees about identified hazards as well as preventive and corrective measures to minimise hazards.
- We provide our employees with protective equipment and clothing free of charge according to their areas of operation.
- We monitor and control work-related health hazards and implement appropriate protective measures.



Respectful treatment

We treat our fellow human beings with respect and dignity. We do not tolerate harassing behaviour and discrimination based on personal characteristics such as age, gender, ethnic origin, nationality, skin colour, political views, sexual orientation, religion, social background or disability.

What is harassment?

Examples are:

- Lewd language in electronic messages
- Racist statements
- Insults
- Religiously or sexually motivated jokes
- Physical advances or questions about sexual favours
- Distributing or disclosing offensive posters or comics
- Verbal intimidation
- The use, display or distribution of pornographic material

Your intention does not matter here, what is important is how the other person perceives your behaviour or your statement. Even if you did not mean it, if the person feels attacked or belittled, it is already harassment.



Financial integrity

We ensure transparent processes in our financial transactions and accounting procedures to prevent and detect fraudulent behaviour. We provide our stakeholders (such as tax or financial auditors) with truthful and accurate information so that they can assess our business performance. We comply with applicable accounting standards and commercial and tax laws.

What we do:

- We record and report our financial data (such as turnover and expenditure figures) accurately, completely and in the appropriate accounting period.
- We never knowingly submit false reports or expense claims.
- We never knowingly record false information or manipulate accounting information.
- We work closely and in a spirit of trust with our internal and external auditors.



Data protection and confidentiality

Large amounts of important information are stored on our corporate networks and servers. We all have a responsibility to protect this information from loss or accidental disclosure. By protecting personal data, we protect the privacy rights of the individuals concerned.

What we do:

- We only use secure passwords that we do not share with anyone.
- We only store confidential information on authorised company drives.
- We never access stored personal data unless our activities require us to do so, or the use is consistent with the original purpose for which the data was collected.
- We inform our manager if we have access to personal data that we do not need for our work.
- We comply with applicable data protection laws when collecting, storing, using, and disclosing personal data.



Human rights and fair working conditions

We support and respect internationally recognised human rights and provide fair working conditions for our employees. We prohibit forced labour, human trafficking, and child labour. We never work directly or indirectly with anti-social powers or organisations that threaten the order and security of society or violate human rights.

What we do:

- Before starting a new business relationship, we check the relevant sanctions lists.
- We base employment relationships on voluntariness and our employees can terminate them at their own will and with reasonable notice.
- We offer our employees remuneration and benefits that at least meet the legally prescribed standards.
- We are guided by the industry-specific, customary remuneration and benefits that ensure an adequate standard of living for employees in the absence of statutory or collectively agreed requirements.



Environmental responsibility

We use natural resources responsibly and sustainably and take steps to continuously improve in this area.

What we do:

- We avoid using materials or methods that could harm the environment or human health when sustainable alternatives are available.
- We save energy and resources by using recycling, for example.
- We identify environmental risks and take measures to ensure that no harmful emissions are released into the air, soil or water.

ENERPARC AG

Kirchenpauerstraße 26
20457 Hamburg
+49 (0)40 75 66 449-0

mail@enerparc.com
www.enerparc.de