



CODE
OF
CONDUCT
FOR
BUSINESS
PARTNERS

BUSINESS PARTNER CODE OF CONDUCT AND ETHICS

Climate change affects us all. Managing it and protecting our climate is an enormous task that we can only accomplish together. Approximately one third of carbon emissions come from the mobility sector and so part of the solution is to speed up the transition to e-mobility. And reducing or even eliminating damaging carbon emissions from transport. To enable this transition, customers really need adequate charging infrastructure so we can drive every day and everywhere, not just in the big cities.

IONITY can help - we have built the largest, fastest, and greenest highway charging network across Europe. IONITY strives to accelerate e-mobility freedom by leading High Power Charging. Our core values "Customer-driven, Results-driven, Reliable, Open-minded" guide us on how we want to work together internally as well as with our external partners.

We are committed to act lawfully and with integrity, take responsibility for the economic, ecological and social impact of our actions, communicate openly and honestly, and treat everyone equally with respect and fairness. This standard is the basis for all our joint business activities. It is therefore essential and a prerequisite for any cooperation that our business partners acknowledge and fully share this standard.

The IONITY Business Partner Code of Conduct and Ethics defines our expectations towards our business partners and sets out binding rules and standards. Each business partner is required to abide by this code as well as strongly encouraged to pass on its essentials and ensure compliance also in their own supplier network.

Any concern about illegal or unethical conduct, or any ambiguity with respect to the interpretation of this code may be raised without fear of retaliation of any kind. Retaliatory acts are never tolerated at IONITY.

Thank you for joining us in making a valuable contribution to sustainability, fairness and integrity!

Dr. Michael Hajesch CEO

Dr. Marcus Groll COO



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1. Applicability

This code, its environmental and sustainability requirements and standards of business conduct apply to all business relationships between IONITY and our business partners to the extent applicable to the respective business activities.

Business partners must take appropriate measures to ensure compliance with these requirements also by their own business partners and along their supply chain.

2. Lawful Business Conduct

The basis and fundamental principle for our actions and for any collaboration with business partners is strict compliance with all applicable laws and regulations accompanied by a zero tolerance principle for non-compliance.

This standard is a prerequisite for cooperation. Only those who meet this standard can be our business partner.

3. Human Rights and Labor Rights

Internationally proclaimed and recognized human rights and labor rights are to be respected and protected. Applicable standards and regulations and fundamental principles including, in particular,

- > Prohibition of slavery, forced labor and human trafficking,
- > Prohibition of child labor and protection of young employees,
- > Prohibition of discrimination and harassment,
- > Fairness and lawfulness in recruitment, compensation and benefits, working hours, occupational health, safety and fire safety,
- > Freedom of association and collective bargaining,

are to be adhered to at any time throughout the whole supply chain.

4. Environment, Resources and Sustainability

With its products and services, IONITY contributes to climate protection and saving natural resources. IONITY thereby assumes responsibility for continuous improvement as an essential part of its sustainable business strategy.

Business partners are expected to share this approach and shall in particular make reasonable efforts to minimize air emissions that pose a risk to the environment and health, including greenhouse gas emissions. Efficient use of energy, water, and raw materials, the use of renewable resources, and the minimization of environmental and health damage are to be proactively pursued. All applicable environmental and climate-related laws and regulations must be complied with in all countries in which our business partners operate.

5. Corruption Prevention, Transparency and Integrity

Undue influence and unethical business practices are intolerable. Business decisions must be made on an objective and verifiable basis avoiding the mere appearance of undue influence. Transparency and integrity are the cornerstones of all business activities.

We do not tolerate corrupt, illicit or unethical practices and take action against them - as we expect the same from our business partners.

6. Fair Competition

Fair and free competition is a fundamental principle and compliance with laws that protect and promote competition is the basis for our market behavior and our business relationships.

Antitrust and competition laws must be observed and any measures that hinder free competition must not be supported. In particular, business partners must not enter into anti-competitive arrangements or agreements with competitors, suppliers, customers or other third parties and must not abuse a possible market dominant position. They must ensure that there is no exchange of competitively sensitive information or any other behavior that restricts or could potentially restrict competition in an improper manner.

7. Prevention from Money Laundering, Sanctions

All provisions of applicable sanctions, regimes and statutory regulations on preventing money laundering and fighting terrorism financing are to be observed and addressed by adequate risk-based measures.

8. Privacy and Digital Responsibility

IONITY places high value on safeguarding privacy and data protection rights and responsible handling of data. We expect our business partners to comply with all applicable laws and regulations governing data protection and data security and handle data as responsibly and transparently as we do.

9. Intellectual Property

All applicable laws on the protection of intellectual property, such as patents, trademarks and designs, domains and copyrights, must be observed, in particular by securing required rights of usage and licenses to avoid any infringements of property rights. The protection of intellectual property is also served by fairness requirements such as counterfeit protection, which must also be complied with.

10. Consequences of Non-Compliance

Business partners take responsibility for compliance with this code. They are expected to notify IONITY of any material deviation from the standards, rules and expectations described herein that may result in regulatory fines, penalties or sanctions for the business partner or IONITY or negatively impact their reputation, including any remedial action taken. In case of reasonable doubts of the business partner's compliance with the code, the business partner shall provide IONITY with all information required for clarification, if necessary by means of an audit.

IONITY reserves the right to take action up to, but not limited to, terminating the business relationship with a business partner who fails to comply with this code.

11. Speak Up and Business Partner Compliance Support

IONITY values its culture of open communication, internally but also with its business partners.

Anyone who has concerns about illegal or unethical conduct affecting IONITY, its business partners or relationships or who has an ambiguity with respect to the interpretation of this code is encouraged to bring them to our attention via compliance@ionity.eu without fear of unlawful retaliation of any kind.

IMPRINT

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