

SUPPLIER CODE OF CONDUCT

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Supplier Code of Conduct

Introduction

Enexion Group, founded in Frankfurt, Germany, in 2002, is a consultancy firm with over 20 years of global experience in the energy, decarbonization (low carbon), and sustainability sectors. Enexion Group is committed to the highest standards of integrity and social responsibility, and Enexion expects all its collaborating Suppliers ("Suppliers"), who provide products and services, to make or have a similar commitment. Enexion Supplier Code of Conduct ("Code") defines the expected standards for Enexion's Suppliers' business practices. Enexion requires its suppliers to comply with all applicable laws and regulations in the geographies where they operate, to act in accordance with this Code, and to be open and cooperative with regulators who enforce these laws. Suppliers are required to impose essentially similar obligations on their own suppliers, subcontractors, and agents to comply with these specified obligations.

Overview

The Code articulates Enexion's values and outlines the expectations and obligations imposed on its suppliers in relation to the following subjects:

1. Ethics and integrity
2. Data privacy and security
3. Inclusion and diversity
4. Employment, working conditions, and human rights
5. Wellbeing, health, and safety
6. Environmental sustainability

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Ethics and Integrity

Anti-Bribery and Anti-Corruption

Suppliers are required to fully comply with applicable anti-bribery and anti-corruption laws. This emphasizes the importance of conducting business with integrity and avoiding involvement in corrupt practices.

Gifts and Entertainment

Suppliers are prohibited from offering or accepting any gifts or items of value that could provide any advantage or influence. This includes gifts given with the purpose of obtaining privileges for the Supplier, Enexion, or any third party. The definition of gifts is broad and includes benefits, fees, commissions, cash, services, or other incentives.

Non-Retaliation for Reports of Concern

Suppliers must have a policy and process for reporting workplace concerns. This system should be transparent, understandable, and provide protection from retaliation for both individuals reporting concerns and those participating in related investigations. This encourages a culture of openness and accountability, emphasizing the importance of addressing and resolving workplace issues without fear of reprisal.

Trade and Sanctions

Suppliers must comply with all applicable trade and sanctions laws and regulations. This ensures that Suppliers adhere to international trade laws and regulations, promoting fair and legal business practices

Data Privacy and Security

Enexion requires its Suppliers to safeguard the security of individuals, including but not limited to employees, customers, other trade partners, and confidential assets and information.

Confidential Assets and Information

Suppliers are obligated to protect Enexion's and its clients' confidential assets and information. Suppliers must design and maintain processes to provide appropriate protections for this information.

Personal Information and Privacy

Enexion requests Suppliers to protect personal information in compliance with all applicable laws and regulations. Personal information provided by or on behalf of Enexion must only be used,

accessed, and disclosed as permitted by the Supplier agreement and in compliance with all applicable laws and regulations.

Inclusion and Diversity

Enexion promotes an inclusive culture and believes that diversity should be celebrated; discrimination of any form is not tolerated.

Non-discrimination and Workplace Diversity

Suppliers must comply with all applicable laws and regulations regarding discrimination in hiring, employment practices, harassment, and retaliation. Suppliers must operate workplaces free of unequal treatment in employment, discrimination, harassment, victimization, and any other abuse on any grounds, including but not limited to age, health status, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religion or beliefs, union affiliation, or veteran status. Unequal treatment includes the payment of unequal remuneration for work of equal value.

Supplier Diversity

Enexion's long-term commitment to diversity and inclusion involves actively fostering relationships with diverse and underrepresented businesses in Enexion's strategic sourcing and procurement processes. Enexion seeks suppliers that similarly value diversity in their own supply chain and support Enexion's goals regarding supplier diversity. Enexion expects suppliers to: (i) use search and assessment processes that are both unbiased and transparent, (ii) proactively ensure that procurement teams provide diverse businesses with fair access to bids, and (iii) where possible, actively seek out and provide opportunities for diverse suppliers to participate in business opportunities.

Employment Working Conditions and Human Rights

Enexion strives to adopt the established principles regarding human rights, labor, environment, and anti-corruption that have been shared by the United Nations, and expects its Suppliers to do the same.

Child Labor

Enexion does not tolerate child labor in any form at any stage of the supply chain. The term "child" refers to any person under the age of 15 or who has not completed compulsory education, unless otherwise specified by applicable laws. The employment of workers under the age of 18 in hazardous work is also not acceptable.

Human Rights

Enexion is committed to respecting human rights in its internal operations and expects the same commitment from its Suppliers. Enexion does not tolerate any form of human rights violations at any stage of the supply chain. Enexion requires Suppliers to implement practices to maintain a respectful and safe working environment. Enexion expects Suppliers to refrain from physical violence, threats, corporal punishment, mental coercion, verbal harassment, disrespectful behavior, bullying, or any form of harassment.

Employment Laws

Suppliers must comply with all applicable wage and labor laws and regulations. Enexion requires Suppliers to provide timely and understandable wage notifications that include sufficient information for accurate remuneration of workers. All forms of workforce utilization, including temporary, dispatched, and outsourced labor, must be carried out in compliance with all applicable laws and regulations.

Recruitment or Use of Private or Public Security Forces

Suppliers that employ or use private or public security forces for protection must provide adequate instructions and oversight to prevent torture, cruel, inhuman, or degrading treatment, harm to individuals' lives or limbs, and infringement on workers' freedom of association.

Well-being Health and Safety

Enexion expects Suppliers to implement effective health and safety practices across business operations.

Health and Safety

Suppliers must comply with all applicable health and safety laws and regulations. Enexion encourages suppliers to adopt practices that minimize health and safety risks, support accident prevention efforts, and ensure a safe workplace for all workers, including employees and/or contractors and other third parties.

Environmental Sustainability

Enexion is committed to reducing the impact of its operations on the natural environment and invites its suppliers to share the same goal.

Environmental Footprint

Suppliers must comply with all applicable environmental laws and regulations. Enexion requires Suppliers to address environmental risks and impacts. Enexion expects Suppliers to have environmental management systems in place, where they can measure and control the usage of water or other natural resources and the amount of waste generated in their operations. Additionally, Suppliers and their supply chains must comply with applicable laws and international conventions regarding the use, handling, and disposal of hazardous waste, persistent organic pollutants, mercury, and similar substances.

Compliance with the Law

Enexion Group has adopted a working style that is respectful to "individuals, environment, people, nature, and laws" in line with its goal of being a globally respectful company and respects the values protected by these rules. Enexion Group is obliged to comply with all applicable laws, regulations, rules, and agreements in all regions where it operates, especially those related to its products and services.

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