

Code of Conduct

for Suppliers and Service Providers



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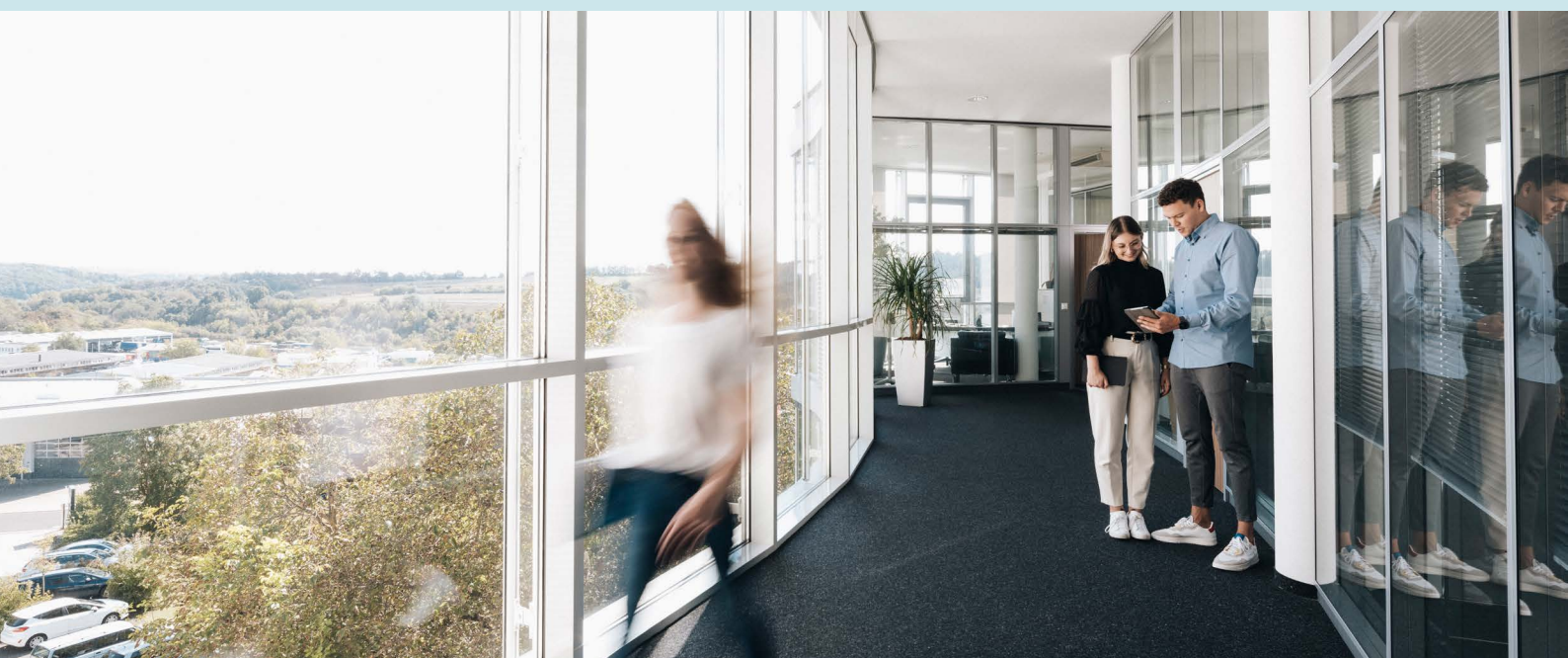
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Preamble

The SENS Group attaches great importance to social and ecological sustainability in its cooperation with suppliers and service providers as well as in the entire supply chain. In this regard, the Code of Conduct for Suppliers and Service Providers describes the fundamental principles for cooperation with suppliers and service providers.

The principles contained represent minimum standards for our business relationships. It is based on the international guiding principles and principles listed below:

- › Universal Declaration of Human Rights
- › United Nations Global Compact (UNGC)
- › UN Guiding Principles on Business and Human Rights
- › UN Convention on the Rights of the Child
- › UN Convention on the Rights of Women
- › OECD Guidelines for Multinational Enterprises
- › Core labor standards of the International Labor Organization (ILO)
- › Paris climate protection agreement
- › Minamata Convention on Mercury
- › Stockholm Convention on Persistent Organic Pollutants
- › Basel Convention on the Regulation of Transboundary Movements of Hazardous Wastes and their Disposal

For the sake of simplicity and easier reading, only the masculine form has been used. References to persons in this Code of Conduct refer to all genders.



Scope

The national and other relevant laws and regulations in force in the countries in which we operate, as well as the principles contained in this Code of Conduct, must be complied with. Of all applicable regulations, the one most suitable for achieving the purpose of protection shall always prevail. Furthermore, the implementation and monitoring of the aforementioned standards must be ensured by means of an appropriate internal procedure. Agreements or transactions that violate applicable law must be refrained from.

01 | Work



1.1 Prohibition of discrimination

Suppliers and service providers shall refrain from any form of discrimination. In particular, no one shall be discriminated against on the basis of age, gender, sexual orientation, pregnancy, disability, nationality, ethnic origin, skin color, religion or world view, political conviction, social background or marital status. Discrimination occurs when a person is disadvantaged on the basis of the above-mentioned characteristics or other objectively unjustified circumstances.

Fairness, diversity and inclusion are a matter of course in any business relationship.

1.2 Fair treatment

As a matter of principle, the supplier and service provider do not use forced labor or prison labor.

They shall ensure that there is no inhumane treatment in the workplace. This includes in particular sexual harassment, corporal punishment, mental and physical coercion and verbal abuse of employees. Employees may also not be threatened with such behavior.

1.3 Wages and working hours

Suppliers and service providers shall comply with all relevant laws, regulations and industry standards on wages and working hours. Wages and other benefits shall at least comply with legal regulations and local standards. They must be clearly defined and paid or provided regularly and in full. The aim is to pay wages and other benefits that cover the cost of living where the statutory minimum wages are too low for this purpose. Deductions for benefits in kind are only permitted to a small extent and only in reasonable proportion to the value of the benefit in kind. Suppliers and service providers shall pay the statutory social benefits and benefits to which employees are entitled under national law (e.g. insurance benefits, overtime pay and paid vacation).

In addition, the composition of the remuneration shall be communicated to the employees regularly and in an understandable form. The obligations arising from the employment relationship shall be recorded in text form and handed over to the employee in the form of an employment contract. As a rule, suppliers and service providers shall not make any deductions for work equipment.

Employees shall not work longer than the legally permissible working hours. Statutory rest days shall be observed. In addition, employees may not be required to work regularly more than 48 hours per week and, including overtime, no more than 60 hours per week. In accordance with national law, this overtime must be paid separately or compensated by time off. Every employee has the right to at least one day off after six consecutive working days.



1.4 Freedom of association

Suppliers and service providers guarantee the right to freedom of association. Employees have the right to assemble in accordance with the relevant laws and to form or join trade unions and employee representative bodies. Employees also have the right to collective bargaining to resolve workplace and wage issues.

Under no circumstances may the assertion of these rights be punished by reprisals.

1.5 Safety and health

Suppliers and service providers shall provide a safe working environment. Workplaces and work facilities must comply with applicable laws and regulations. Any violation of basic human rights at the workplace and in operational facilities is prohibited. In addition, fire safety and emergency response requirements in particular must be complied with.

Adolescents (young people) in particular should not be exposed to dangerous, unsafe or unhealthy conditions that jeopardize their health and development. Employees shall receive regular training on health and safety in the workplace. Adequate cleanliness shall also be maintained in workplaces. If suppliers and service providers provide accommodation for employees, the same requirements apply accordingly.

An employee health and safety representative shall be designated from within management to be responsible for implementing and maintaining workplace health and safety standards.

1.6 Disciplinary measures

Disciplinary measures must be taken within the framework of national law as well as internationally recognized human rights. Any inappropriate disciplinary action must be refrained from, such as in particular the withholding of salary, social benefits or documents (e.g. ID cards) and the prohibition to leave the workplace.

Furthermore, suppliers and service providers shall respect the right of termination of its employees.

1.7 Child labor and protection of minors

Suppliers and service providers shall not use child labor and shall observe regulations for the protection of minors. The minimum age of employment shall not be below the age at which compulsory schooling ends. In no case may employees be younger than 15 years of age (or 14 years of age if permitted by national law in accordance with ILO Convention 138).

National regulations and international standards for the protection of minors must be observed. In addition, adolescents (young people) may not perform night work.

1.8 Corporate values

Suppliers and service providers shall handle the work equipment and assets of the SENS Group with care and responsibility. Unnecessary damage and costs are to be avoided, buildings and facilities are to be maintained to protect their value.

02 | Environment





2.1 Environmental protection laws

Suppliers and service providers shall comply with the relevant environmental protection laws and regulations.

The operations of suppliers and service providers shall comply with the requirements of waste legislation as well as emission and water protection. All regulations concerning hazardous substances shall be complied with by the suppliers and service providers. This applies in particular to the storage, handling and disposal of hazardous substances. Employees shall be instructed on the handling of hazardous materials and substances.

2.2 Resources and environmental pollution

Environmental pollution shall be avoided or at least reduced as far as this is possible by reasonable means. Environmental and climate protection as well as the promotion of biodiversity is an ongoing task that can only be fulfilled by constantly improving the level of protection through the permanent reduction of resource consumption and waste reduction. Suppliers and service providers undertake appropriate efforts for this within the scope of its business activities.

Negative impacts on the environment and climate caused by themselves or within their supply chain must be minimized or prevented at the point of origin.

03 | **Laws and regulations**



3.1 Competition and cartel

Bribery, venality and other corruption are prohibited. In addition, the supplier and service provider shall comply with all professional standards relevant to its industry. There are no agreements to be made with suppliers and service providers and competitors. This also applies to the exchange of information on market shares, prices, strategies, investments, capacities or other sensitive data. Antitrust regulations must be complied with.

Business decisions must be made solely in the best interests of the Company. This applies in particular when employees can directly or indirectly influence the awarding of orders.

3.2 Economy

Business relationships are analyzed for suspected money laundering and terrorist financing. Money laundering activities must be prevented by all means.

The regulations in foreign trade and customs law must also be observed.

National and international business activities must comply with tax regulations and reporting requirements. In accordance with the value chain, taxes are to be declared and paid where they were incurred.

3.3 Data protection and confidentiality

Due to the high sensitivity, business secrets and personal data must be strictly protected. It must be ensured that confidential information does not unlawfully fall into the hands of third parties or the public.

Attention must be paid to data protection principles such as purpose limitation and data minimization.

Suppliers and service providers are obliged to treat company and business secrets confidentially and to protect them.



04 | Compliance



4.1 Subcontractors

Subcontractors used by the suppliers and service providers for the provision of their services must comply with the standards set out in this Code of Conduct. Suppliers and service providers shall inform them of the contents of this Code of Conduct and demand that they comply with the requirements and standards set forth herein.

4.2 Reporting violations and duty to cooperate

If the suppliers and service providers become aware of indications that point to a not insignificant or prolonged violation of this Code of Conduct, they must report this immediately and initiate immediate countermeasures, specify them in concrete terms and communicate them to SENS, stating the timeframe for implementation. Suppliers and service providers are obliged to provide written information on violations upon request. The information must include a detailed description of the violation, the persons involved and the consequences that have occurred or may occur as a result of the violation (e.g. official measures). Suppliers and service providers shall cooperate in clarification measures regarding a violation. The notification shall be made with due regard for the legitimate interests of the suppliers and service providers with due regard for the rights of employees, in particular data protection and the protection of business secrets. This shall also apply to violations by subcontractors.

Furthermore, an internal reporting system for violations of these standards shall be established; employees who make reports may not be disciplined or disadvantaged for this reason. Contact can be made via **compliance@steag.com**.

The principles of fairness and proportionality also apply here. Each individual case should be examined and the consequence weighed. No retaliation or discrimination will be tolerated as a result of the report.

4.3 Audits

Suppliers and service providers will make it possible to verify compliance with the Code of Conduct by SENS or appointed third parties. For this purpose, it shall provide written information in response to inquiries and allow on-site inspections of its operations. shall grant the insight into corresponding documentation required for the purpose of the respective audit.

Upon request, suppliers and service providers shall allow subcontractors used for the performance of the service to grant it corresponding inspection rights.

4.4 Termination

In the event of a breach of obligations contained in this Code of Conduct, suppliers and service providers may be given a reasonable period of time to remedy the situation or, if this is not possible due to the nature of the breach, a warning may be issued. If the suppliers and/or service providers allow the deadline to expire without remedial action or if there are repeated violations, the contractual relationship may be terminated without notice. In the event of repeated or serious violations, the contractual relationship may be terminated without notice, even without setting a deadline or issuing a warning. Further rights, in particular a possible claim for damages, remain unaffected.

We create the future with 100 % Good Energy

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