

1. THE MEANING OF THE KEMPOWER SUPPLIER CODE OF CONDUCT

This Code of Conduct describes the operating principles all Suppliers of Kempower Oyj and its affiliates ("Kempower") shall comply with. This Code of Conduct has been written based on the values that guide Kempower's everyday operations: *together, courage, integrity and impact*. The Code of Conduct translates Kempower's values into principles that are the foundation of our daily operations and decision-making. Ethical culture and doing the right thing are integral part of Kempower operations, both as a company and as individuals. Ethical culture and sustainability are also differentiators for our business when operating in global markets on different continents. Making sustainable choices is the core of our electric charging business including our people. By doing the right thing, Kempower strengthens our customers' and shareholders' trust in us, achieves success in building long-lasting partnerships, and creates value for our shareholders.

2. COMPLIANCE WITH THE LAWS AND PRINCIPLES OF ETHICAL BUSINESS CONDUCT

The Supplier shall always operate according to the laws and regulations applicable to Kempower business including all laws and regulations related to export controls and economic sanctions. The Supplier ensures that it has a sufficient understanding of local export and import regulations, processes, and restrictions. All information referring to the value, origin, or other data must be declared accurately and transparently to customs authorities. The Supplier complies with laws and practices to prevent, detect and report money laundering, and is committed to reporting any suspicious transactions. In addition to complying with applicable legislation, the Supplier shall follow generally recognized ethical standards, such as the United Nations Global Compact principles.

3. RESPECT OF PRIVACY

The Supplier shall respect the privacy and protection of personal data, whether it is that of employees, business partners, job seekers, or customers. The Supplier shall collect, process, and store personal data only for consented purposes in accordance with applicable laws. The implementation of data protection within the Supplier is the responsibility of all Suppliers' personnel.

4. ENVIRONMENTAL RESPONSIBILITY AND KEMPOWER'S TARGET OF 100% CARBON NEUTRALITY BY 2035

The Supplier commits to the protection of the environment in its actions and to minimize the use of energy, water, and other resources, emissions, and waste when possible. The Supplier shall monitor and improve its product development, production, transportation and end-of-life planning to take environment into account throughout the organisation. For example, reduce, reuse and recycling of materials, use of renewable energy, decar-



bonization, water quality, consumption and management, responsible chemical management, animal welfare, land, forest, and water rights, force eviction, soil quality, biodiversity, land use, deforestation and noise emissions are aspects to be considered by the Supplier in its processes.

Environmental impact is the cornerstone of Kempower's operations and strategy while our products and services help the whole world towards fossil-free targets through emission-free mobility. Kempower is committed to 100% carbon neutrality by 2035 and Kempower's Suppliers shall support this target in their operations.

5. RESPONSIBILITY IN COOPERATION WITH THE SUPPLIERS' STAKEHOLDERS

Kempower's success is based on highly professional employees at Suppliers and their whole value chain who are committed to working with the highest integrity for the best interests of Kempower and its Customers in all daily situations.

6. SUPPLIER'S LABOUR PRACTICES

The Supplier shall maintain a working environment in which people are appreciated and treated with respect. Employees or job seekers shall not be discriminated against or treated unfairly in relation to recruitment, hiring, education, promotions, salaries, compensation, or other employment matters. The Supplier shall employ and retain possible employee candidates on their qualifications, skills and competencies only and a person's sex, race, religion nationality, disability, sexual orientation or any other personal characteristic is not used in decision making. The Supplier shall commit to employment and labour laws and regulations in their operations including minimum wage requirements, maximum working hour requirements, minimum rest day requirements, privacy, child labour, young worker protection, women's rights, forced labour, migrant and worker's rights and rights of indigenous people.

The Supplier shall seek to provide its employees with a work environment that is free from harassment of any kind as well as any other offensive or disrespectful conduct. Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment.

The Supplier conducts its business in a manner that supports and respects the protection of internationally proclaimed human rights. If required to do so, the Supplier shall in full support UK Modern Slavery Act and agree to publish a statement of their action plans, progress and challenges annually. Modern slavery includes slavery, human trafficking, forced or compulsory labour and servitude. As these activities are usually hidden and hard to spot, the Supplier commits to report their findings and tackle these issues transparently.



7. COUNTERFEIT PARTS

The Supplier shall ensure that only authentic materials are used in the products delivered to Kempower and that these products do not contain any counterfeit parts. Counterfeit parts shall mean in this respect any parts, components, modules or other material whose origin, source of manufacture, performance or characteristics are misrepresented. This shall include but is not limited to any parts that are not sufficiently traceable to ensure the authenticity; any parts which have not been verified, screened or tested properly by the original manufacturer; parts which have been remarked, re-labelled, repaired, refurbished or otherwise modified; or parts that have been scrapped by the original manufacturer due to defect or other reason. By a request of Kempower, Supplier shall make available traceability of the components used in the products delivered to Kempower.

8. SAFETY AND WELL-BEING AT WORK

The Supplier shall ensure that their employees have a secure and safe working environment that supports their well-being. The best way to do this is to follow common instructions and promptly report any safety or security issues. In addition to physical safety, the Supplier shall promote the mental health and well-being of its employees.

9. DIVERSITY

The Supplier shall value diversity and the unique qualities of every individual: personality, lifestyle, work experience, ethnic background, sexual orientation, religion, gender, age, nationality, skills, and other characteristics. The Supplier is committed to equal opportunities including the principle of equal pay to equal work. Where necessary, the Supplier provides their employees adequate facilities for religious practice.

10. EMPLOYEES' FREEDOM OF ASSOCIATION

The Supplier shall respect the right of our employees to associate according to the existing legislation. The Supplier's employees are free to use collective bargaining to protect their rights as employees and the Supplier shall respect their rights to peacefully assembly or protest.

11. CONFLICTS OF INTEREST

No decisions and business transactions can be based on personal interests. Supplier's employees treat friends and relatives as any other business partner, and personal relationships with business partners must not influence our decision-making. The Supplier needs to recognize and avoid conflicts of interest and disqualify themselves from making a decision if it includes or may include a conflict of interest. The Supplier's employees shall report any circumstances that may be interpreted as conflicts of interest according to their company's own Code of Conduct.



12. FINANCIAL RESPONSIBILITY AND ZERO-TOLERANCE TO CORRUPTION

The Supplier takes a zero-tolerance approach to corruption and uphold all laws relevant to countering corruption in all jurisdictions in which it operates. The Supplier is committed to following applicable accounting principles and standards, to reporting financial information accurately and completely and having appropriate internal controls and processes to ensure that accounting and financial reporting comply with the applicable laws. All Supplier's accounting and reporting must be transparent, truthful, and provided in a timely manner and in accordance with all applicable laws. The Supplier makes sure that the gifts and hospitality always support a clear business objective and are properly recorded, reasonably valued, and appropriate to the nature of the business relationship. The Supplier is not permitted to provide or receive any gifts or hospitality that may affect their decision-making related to business operations or that have considerable personal or financial value.

13. FAIR COMPETITION

The Supplier competes honestly, fairly and in accordance with the applicable laws. All Supplier's employees must comply with laws, including competition laws, regulations and internal guidelines. The Supplier respects the intellectual property and confidential information of others.

14. PROTECTION OF THE ASSETS OF KEMPOWER

All Supplier's employers must use Kempower's resources including all intellectual property with due care and protect them from theft, loss, damage and misuse. Kempower's resources are physical property, such as our business premises, equipment, machinery, raw materials, finished products, vehicles, and company assets. Resources also include intangible assets such as confidential information, intellectual property rights and data systems.

The Supplier may receive Kempower's confidential information where separate confidentiality agreement applies. All employees at the Supplier must maintain the confidentiality of business secrets, documents and internal information of Kempower. Information concerning Kempower must not be disclosed without justified grounds or purpose. The Suppliers shall apply the same principles to the information entrusted to Supplier by Kempower's customers and other stakeholders.

15. COMPLIANCE AND MONITORING OF THIS CODE OF CONDUCT

Supplier's executives and managers are responsible for communicating and implementing this Supplier Code of Conduct, as well as monitoring its compliance. Each Supplier's employee is personally responsible for complying with this Supplier Code of Conduct in their daily work. The Supplier shall also ensure that their suppliers and the whole supply



chain also follows Kempower Code of Conduct.

Kempower encourages its Supplier's employees to contact their supervisors, management or other persons responsible, such as the administration department, in unclear situations.

Any violation of this Supplier Code of Conduct or suspicion thereof must be reported via Supplier's supervisors, Kempower contact persons or directly via [Kempower Whistle-blower channel](#).

This Supplier Code of Conduct of Kempower has been approved by the Board of Directors of the Kempower. This Supplier Code of Conduct will be updated, if required.