



# *Code of Conduct*

## *for EVBox Supply Chain*

REVISION: 1

EFFECTIVE DATE: 1ST NOVEMBER 2023

# Foreword

*As a provider of EV charging stations, we recognize the critical role we play in shaping the sustainable future of transportation. Therefore, every day we are committed to ensuring the highest standards of ethical behavior, social responsibility and environmental sustainability.*

This commitment is reflected in our Company Values: we're passionate, we're reliable, we're human.

Passion is the key to innovation and it fuels our desire to constantly improve and exceed expectations.

Reliability is the foundation of our business relationships and, by extension, our charging stations, and a crucial element in today's fast-paced business environment.

Being human-centered is at the core of our identity. We foster inclusivity, diversity, equal opportunities, and human rights across our organization.

To uphold our Company Values, we are guided by the fundamental ethical principles of honesty, transparency and integrity. Founded on our Company Values and principles, this Code of Conduct serves as our compass, guiding us

and our Suppliers through a responsible, sustainable and ethical journey as we source, produce and distribute our products. It sets out the expectations we have for our Suppliers to ensure that together we uphold the values and principles that define our company.

To build a cohesive network of responsible practices, we ask our Suppliers to not only comply with this Code of Conduct but to also communicate the same principles and expectations to their own suppliers, encouraging them to adopt similar, if not more ambitious, standards.

We recognize that this endeavor requires a collaborative approach, therefore, we intend to foster a collaborative environment, where we can work together to implement the outlined expectations and collectively drive positive change by actively exchanging knowledge and experiences.

A blue ink signature of Remco Samuels, written in a cursive style, positioned above a light blue rectangular background.

Remco Samuels  
Chief Executive Officer

A blue ink signature of Alexander Fedorczuk, written in a cursive style, positioned above a light blue rectangular background.

Alexander Fedorczuk  
SVP Manufacturing

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## → Scope of Application

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1. This Code of Conduct (**Code**) applies to each of our direct suppliers and each tier 2 and tier 3 suppliers who have agreements or other arrangements with us to supply our direct suppliers (**Suppliers**). EVBox and the Supplier may agree that the general requirements set out in this Code may be supplemented by more detailed standards which the Supplier shall also comply with (**Standards**). Up-to-date copies of this Code and all Standards are published at [Supplier Resource Center](#).
2. This Code should be read in conjunction with any agreements in place between the Supplier and EVBox, which shall take precedence to the extent of any overlap.
3. Suppliers shall ensure that their own supply chain complies with this Code and applicable Standards or equivalent codes and standards.

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## → Compliance with Laws & Regulations

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1. Suppliers shall comply with all local, national, and international laws and regulations relevant to their operations, ensuring that their operations meet or exceed the minimum requirements set forth by governing authorities.
2. Suppliers shall maintain all necessary licenses, permits, and certifications required to operate lawfully within their respective jurisdictions.
3. Suppliers shall accurately maintain and timely submit all required regulatory reports and documentation, ensuring compliance with reporting obligations as mandated by governing authorities.

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## → Trade Compliance

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1. Suppliers shall, at all times, comply with all applicable trade compliance laws and regulations, import and export controls and economic sanctions of the European Union, the United Kingdom, the United States, and all other relevant jurisdictions.

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## → Health & Safety

### Occupational Health and Safety

1. Suppliers shall provide a safe and healthy environment across all locations where work is undertaken. Suppliers are encouraged to establish an occupational health and safety management system in accordance with global standards (such as ISO 450001 or similar) to identify, control and reduce occupational health and safety risks.
2. Suppliers shall promote a culture of safety, providing comprehensive training and education to employees on workplace hazards, safe work practices, and emergency procedures.
3. Suppliers shall ensure that all personnel present on their premises have access to personal protective equipment suitable for their work tasks.
4. Suppliers shall be responsible for regular maintenance and inspection of all machinery, equipment, and infrastructure to minimize the risk of accidents or injuries.

### Emergency Preparedness

1. Suppliers shall develop and maintain emergency response plans that outline procedures to be followed in the event of emergencies, including fire, natural disasters, or other incidents that may pose a threat to health and safety.
2. Suppliers shall regularly review and test their emergency response plans to ensure their effectiveness and communicate these plans to all relevant stakeholders.



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## → Human Rights and Labor

### Employment Practices

1. Suppliers shall uphold the principles of equal opportunity and fair employment practices in all aspects of their operations. Suppliers shall not engage in any form of discrimination based on nationality, race, color, gender, religion, age, disability, marital status, sexual orientation, or any other protected characteristic. Employment decisions should be based on merit, skills, and qualifications.
2. Suppliers shall not engage in or tolerate the use of forced labor, child labor and any form of human trafficking. Suppliers shall ensure that their workforce consists of individuals who meet legal age requirements and have voluntarily chosen employment.
3. Suppliers shall provide a safe and healthy working environment for all personnel, including appropriate protective equipment when necessary. Suppliers shall treat workers with respect, dignity, and fairness, free from any form of physical, verbal, or psychological abuse or harassment.

### Freedom of Association and Collective Bargaining

1. Workers shall be free to exercise their right to join or form trade unions or worker associations and engage in collective bargaining in accordance with local laws and international standards.
2. Suppliers shall respect and not interfere with workers' rights to associate, organize, and bargain collectively. Suppliers shall not engage in any form of discrimination, harassment, or retaliation against workers exercising these rights.





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## → Human Rights and Labor

### Fair Compensation

1. Suppliers shall provide workers with fair wages that meet (or exceed) legally mandated minimum standards. Wages should be paid regularly, accurately, and in full compliance with local laws and industry practices.
2. Deductions from wages should be transparent, lawful, and authorized by the worker, or required, or permitted by law.

### Working Hours

1. Suppliers shall ensure that working hours comply with applicable laws and industry standards, including limitations on overtime hours.
2. Overtime work should be voluntary, within the limits permitted by laws or agreed to in relevant agreements, always properly compensated, and limited to reasonable levels not to cause any physical or mental harm. Workers should be provided with sufficient rest periods and days off.

### Transparency and Reporting

1. To the extent required or permitted by law, Suppliers shall be transparent in disclosing their labor practices, goals and initiatives, including efforts to promote diversity and inclusion and engage in appropriate internal education and awareness programs.



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## → Environment

### Responsible Management

1. Suppliers shall strive to minimize resource consumption, including water, energy, and raw materials by implementing efficient technologies and practices.
2. Suppliers shall establish sustainable practices, such as energy efficiency, waste reduction, and recycling programs throughout their supply chain to minimize the environmental impact of production processes and promote the circular economy principle.
3. Hazardous substances and chemicals should be managed, stored, and disposed of safely and in compliance with relevant laws and regulations.

### Climate Change Mitigation

1. Suppliers shall take proactive measures to reduce their greenhouse gas (GHG) emissions, including energy consumption, transportation and waste management.
2. Suppliers shall continually assess and improve their carbon management strategies, incorporating new technologies and practices as they become available.
3. Suppliers shall prioritize working with suppliers that demonstrate a commitment to GHG emissions reduction.
4. Suppliers are encouraged to collaborate with us and other stakeholders to share best practices, knowledge, and technological advancements that support the transition to a net zero GHG economy.

To assist Suppliers, we have adopted specific Net Zero Standards for Supply Chain, which are available at the [Supplier Resource Center](#).

### Biodiversity and Ecosystem Protection

1. Suppliers shall respect and protect biodiversity and ecosystems in their operations, avoiding activities that could cause harm or destruction to natural habitats, protected areas, or endangered species.
2. Suppliers shall engage in sustainable sourcing practices, promoting the responsible procurement of raw materials and avoiding materials from illegal or unsustainable sources.

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## → Environment

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### Environmental Management Systems

1. Suppliers are encouraged to establish and maintain environmental management systems (EMS) based on recognized standards such as ISO 14001. These systems should facilitate continuous improvement, risk assessment, and performance monitoring.
2. Suppliers shall conduct regular environmental audits and assessments to identify areas for improvement and implement appropriate corrective actions, where necessary.

### Transparency and Reporting

Suppliers shall be transparent in disclosing their environmental performance goals and initiatives, including efforts to reduce environmental impacts, promote sustainability, and engage in environmental education and awareness programs.

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## → Responsible Sourcing of Minerals

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1. Suppliers shall comply with all applicable laws and regulations regarding Conflict Minerals (which are tin, tungsten, tantalum, and gold).
2. Suppliers shall exercise due diligence to ensure that the minerals used in their products are sourced responsibly and do not directly or indirectly finance armed conflicts or human rights violations.
3. Suppliers shall maintain transparency within their supply chains, providing accurate and reliable information about the origin of the minerals used in their products.





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## → Data Privacy and Security

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1. Suppliers shall comply with all applicable cybersecurity and data protection laws and implement appropriate measures to safeguard the confidentiality, integrity, and availability of data, protecting it from unauthorized access, loss, or misuse. Suppliers are encouraged to establish an information security framework in accordance with global standards (such as ISO27001 or similar) to maintain and remediate information security risks.
2. Suppliers shall promote security awareness culture and provide necessary trainings to ensure a secure working environment for their personnel.
3. Suppliers shall demonstrate reasonable efforts to provide necessary information about their security posture to EVBox. In addition, Suppliers shall inform EVBox in case of any material security incidents that impact EVBox confidential information.

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## → Ethics

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### Honesty, Transparency and Integrity

1. Suppliers shall, at all times, act with honesty, transparency, and integrity, consistently applying the highest ethical standards. Honesty, transparency, and integrity are the values underlying our trust-based relationship with our customers and shall be equally observed by our Suppliers.
2. Suppliers shall accurately represent their products, services, capabilities, and certifications, providing truthful and reliable information.

### Professional Conduct

Suppliers shall uphold the highest standards of professional conduct in all aspects of their operations, including interactions with our employees, customers, and partners, reflecting positively on the reputation and values of both the Supplier and EVBox.

### Conflict of Interest

1. Suppliers shall avoid any conflicts of interest that may compromise their ability to act in accordance with their legal and contractual obligations.
2. Suppliers, or Suppliers' representatives, shall promptly disclose any actual or potential conflicts of interest that arise during their business relationships with us or other parties.

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## → Ethics

### Anti-Corruption

1. Suppliers shall comply with all applicable anti-corruption laws and regulations.
2. Suppliers shall put robust systems in place to prevent and detect corruption, including clear policies, employee training, and internal controls.

### Financial Fraud

1. Suppliers shall comply with all applicable tax laws, regulations, and disclosure requirements. This includes accurately and timely fulfilling tax obligations, such as filing tax returns, making tax payments, and maintaining appropriate tax records.
2. Suppliers shall not engage in and shall have measures in place to prevent any form of money laundering, tax fraud, tax evasion, aggressive tax planning, or other illegal financial schemes.

### Fair Competition

1. Suppliers shall promote fair competition and comply with all competition laws in their respective jurisdictions.
2. Suppliers shall refrain from engaging in anti-competitive practices such as price-fixing, bid-rigging, market allocation, or abusing their market position.

### Protection of Intellectual Property

1. Suppliers shall respect the intellectual property rights of others, including patents, trademarks, copyrights, and trade secrets.



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## → Whistleblowing

### Reporting Channels

1. Suppliers shall foster a culture of open communication, encouraging their employees, and external stakeholders to report any concerns or incidents of (potential) misconduct.
2. Suppliers shall make available appropriate and accessible reporting channels that allow employees, contractors, and other internal or external stakeholders to report concerns or instances of misconduct confidentially and, where required or permitted by law, anonymously.
3. Suppliers shall establish (a) policies and procedures that safeguard confidentiality of a reporter and reported matter and (b) a process in place through which reported concerns or violations can be appropriately followed up on, assessed, and remediated.

### Non-retaliation

Suppliers shall put measures in place to protect the reporters from retaliation, unfair treatment, harassment, or any adverse consequences as a result of reporting in good faith.

## → Due Diligence and Risk Management

Suppliers shall establish a reasonably appropriate due diligence framework designed to identify, prevent, and mitigate risks and adverse impacts in their own operations and in their supply chain, particularly in relation to human and labor rights, environmental, and business ethics.



## Continued cooperation with our Suppliers is vital to driving positive change and improving our collective impact.

We encourage open lines of communication, knowledge sharing, and collaborative problem-solving to address any challenges that may arise when implementing the principles set out in this Code.

By working together, we can make a difference and create a business environment that aligns with our shared values and objectives. Together, we can find innovative solutions and contribute to a more sustainable future.

*Thank you for your dedication to upholding these principles.*



### *Where to look for advice*

When in doubt about the meaning of any part of this Code or of any Standards, or the appropriate course of action, Suppliers should seek guidance from their designated contact person at EVBox.

### *Where to report concerns*

We encourage all Suppliers to come forward and report any concerns or issues that may potentially violate this Code or any Standards. For this purpose, Suppliers can reach out to us via a confidential hotline hosted by a third-party provider, EthicsPoint ([hotline](#)).





We wish to support our Suppliers communicating the same principles and expectations set out in this Code of Conduct to your own suppliers, encouraging them to adopt similar, if not more ambitious, standards.

You may therefore share and adapt this Code of Conduct under the terms of the Creative Commons Attribution-ShareAlike 4.0 International licence (CC BY-SA 4.0) available [here](#).



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