

VOLTAiRA

Responsible Business Policy

RESPONSIBLE BUSINESS POLICY of FIT Voltaira Group

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I. INTRODUCTION

FIT Voltaira Group is committed to achieving the highest standards of ethics, quality, safety, sustainability, and customer satisfaction, in alignment with applicable laws, as well as the expectations of stakeholders and governing authorities. Additionally, we decided to align with international conventions, guidelines, principles and standards¹, adhering to the Ten Principles of the United Nations Global Compact and the OECD guidelines.

The integrity of our organization relies on consistent performance and ethical conduct across all levels and locations. To attain this uniformity, we adhere to a set of commonly agreed-upon ethical standards that not only guide our actions but also shape the culture within the company. These ethical principles are encapsulated in our Responsible Business Policy.

It is incumbent upon every team member to familiarize themselves with, and actively enforce, the principles outlined in this Code. Our collective commitment to ethical conduct is essential for navigating the challenges that come our way; it enables us to maintain our integrity and consistency in our work, relationships, and overall business operations.

The Responsible Business Policy further delineates the behavioral expectations we have as an organization. It is crucial that all team members fully understand, identify with, and integrate these guidelines into their daily operations.

By adhering to the principles articulated in this Code, we not only meet the expectations and regulations imposed upon us but also create an environment where individuals and the enterprise can flourish and prosper.

¹ As reflected in section XI. References.



II. THE PURPOSE AND SCOPE OF THE RESPONSIBLE BUSINESS POLICY

Purpose of the Responsible Business Policy

- To articulate and establish the ethical principles and behavioral expectations that guide our work;
- To serve as a resource for management and team members in making ethical decisions;
- To provide a framework for resolving ethical dilemmas and conflicts;
- To safeguard and build upon the company's existing values while fostering the creation of new ones.

Scope of the Responsible Business Policy

This Code applies to all individuals who are in a contractual relationship with FIT Voltaira Group, whether current or former, paid or unpaid. This includes, but is not limited to:

- Full-time, part-time, and fixed-term employees (including directors and managers);
- Temporary staff and agency workers;
- Independent contractors, freelancers, and entrepreneurs;
- Subcontractors and suppliers;
- Volunteers and interns;
- Shareholders and board members.

Anyone acting on behalf of FIT Voltaira Group, or under its purview, is expected to adhere to the principles set forth in this Responsible Business Policy at all times.

It is the responsibility of direct supervisors and functional managers to ensure that all team members are acquainted with this Code and its ethical principles. The enforcement of its application lies with them.

III. GENERAL VALUE SYSTEM – PRINCIPLES OF ETHICAL CONDUCT

The following principles serve as the bedrock upon which FIT Voltaira Group builds its culture, business practices, and relationships.

1. Regulatory Compliance

All employees must be aware of and comply with applicable laws, rules, regulations, in the cities, states and countries in which the Company operates and internal policies.

All employees must seek advice from appropriate personnel when necessary. Questions about compliance & ethics should be addressed to the Ethics Officer and/or legal issues to the Global Legal Counsel as necessary.

This involves not just reactive adherence, but also a proactive approach to identify issues and solve them within the legal framework. Regular training and updates will be provided to ensure everyone is informed.



2. Human Rights & Respect for the Individual

FIT Voltaira Group values, respect and support the protection of dignity, freedom, and human rights of individuals. We are committed to promoting a working environment where employees are treated with dignity and respect and implement a management system for human rights and working conditions in accordance with the UN Guiding Principles on Business and Human Rights.

We prohibit all kinds of violence, harassment and behavior violating human rights and expect our employees to engage in business activities promoting respect and dignity. We avoid the use of private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

Suppliers must respect the human rights of workers, local communities and other relevant stakeholders, and prevent and address adverse human rights impacts linked to their business activities.

3. Freedom of Expression

Employees are encouraged to share constructive feedback and ideas without fear of reprisal. A climate of open dialogue and respect for differing opinions contributes to a more effective and harmonious work environment.

4. Integrity, Fairness, and Trustworthiness

Employees are expected to conduct themselves with the utmost integrity in all professional dealings. This includes fair treatment of colleagues, clients, and other stakeholders. Trustworthiness extends beyond honesty—it also encompasses the reliability and consistency in one's actions and decisions.

5. Labor

FIT Voltaira Group values our employees and recognizes the employee right to freedom of association and collective bargaining. We prohibit child labor and comply with all applicable laws in this respect.

Our labor policy is against all forms of forced and compulsory labor. We commit to eliminate discrimination in respect of employment and occupation. We report cases in which we cannot fulfill our responsibilities.

6. Health and Safety

As FIT Voltaira Group, we prioritize the health and safety of our employees and provide a healthy and safe workplace that meets or exceeds local and national safety, occupational health, and fire safety legislation.

We conduct hazard and risk analysis and take necessary actions including preparation of emergency response plans to ensure safety of our employees, minimize and prevent risks of workplace accidents including traffic accidents, work-related illnesses and incidents.

Our countries of operations must include road safety requirements in their health and safety management system and to track road traffic injuries as part of work-related injuries and work systematically to improve their road safety measures to prevent traffic accidents in their operations.



Seatbelt use is mandatory for all drivers and passengers, we strictly prohibit alcohol consumption and mobile device usage during work hours, enforcing rest/break regulations, and ensuring compliance with legal speed limits.

We provide safety training and personal protective equipment for our employees and contractors. We are committed to compliance with national and international standards and legal requirements in occupational health and safety and establish ISO 45001 Health & Safety Management System in our country of operations globally.

All employees and our contractors must comply with legal requirements, Health & Safety Policy, rules, and guidelines described in workplace procedures, participate in safety training sessions, adhere to safety guidelines rules described in the workplace, Health & Safety Policy and procedures to prevent accidents and work-related illnesses.

7. Inclusion & Diversity

FIT Voltaira Group unequivocally commits to cultivating an inclusive and diverse workplace where every employee is valued and respected.

We strictly prohibit discrimination, harassment, or mistreatment based on gender, ethnicity, race, nationality, age, language, health status, disability, sexual orientation, opinions, and religion.

Beyond prohibition, we actively foster an environment that celebrates individual differences as a vital component of our culture, encouraging empathy, understanding, and mutual respect. We empower our employees to contribute unique perspectives, promoting a richer, more innovative, and inclusive corporate ecosystem. Integral to this commitment is our firm stance against sexism and gender-based discrimination.

We strive to ensure all individuals, regardless of gender, are treated with dignity. Expected behavior includes promoting gender equality, women empowerment, utilizing inclusive language, and valuing all contributions equally, while prohibited behavior encompasses gender-based derogatory remarks, perpetuating stereotypes, and engaging in sexual harassment.

As FIT Voltaira Group we take all appropriate measures, including legislation, to ensure the full development and advancement of women, for the purpose of guaranteeing them the exercise and enjoyment of human rights and fundamental freedoms on a basis of equality with men. Our goal is to create a workplace where every individual feels esteemed and empowered to reach their full potential, fostering a culture of respect and equality.

8. Environment Protection

As FIT Voltaira Group, we are committed to sustainable development and protecting the environment in all countries we operate, making efforts to minimize the risks associated with environmental impacts of our production, services, and products, in compliance with legal requirements and international standards. We acknowledge this commitment as part of our social responsibility.



As FIT Voltaira Group, we ensure compliance with all relevant national and international environmental laws, regulations and frameworks including animal welfare, countries of our operations shall maintain and advance ISO 14001 environmental management system and take measures to achieve ISO 14001 objectives and reduce its environmental impacts continuously.

We expect our employees to adhere to all environmental laws, regulations, and company policies and environment management system requirements and participate in training sessions, sustainability programs and use energy and resources efficiently and responsibly.

9. Climate Protection & Energy Efficiency

Climate protection and decarbonization is an integral part of our environmental strategy.

As FIT Voltaira Group, we work on energy optimization, GHG (greenhouse gas) emissions and product carbon footprint reduction in line with Group SBTi (Science Based Target Initiative) validated Net Zero Goals. We calculate our direct and indirect emissions in line with globally recognized standards, align with our goals in the value chain and reduce their emissions through process modification, increasing energy efficiency, generating or procuring energy from renewable energy resources or other measures. GHG reduction goals shall be tracked and reported by all countries of operations and functions on monthly basis and GHG emissions inventory shall be prepared on an annual basis.

As FIT Voltaira Group, we are also committed to establish or maintain and improve ISO 50001 Energy Management System and minimize the energy consumption by implementing energy efficiency programs and GHG emissions of products and services, striving for sustainable solutions in all country of operations.

10. Water Management

As FIT Voltaira Group, we promote responsible water consumption, preserve water resources by minimizing water withdrawal in scarce regions, without restricting access to potable water and sanitation. Our countries of operations shall implement programs to reduce their water footprint and prevent water pollution and contamination. Wastewater discharge must comply with local regulatory requirements.

11. Air, Soil, Noise, Biodiversity and Forest Protection

As FIT Voltaira Group, we are committed to comply with applicable statutory provisions and local authorities' requirements, local and international standards and expected to implement effective strategies to control air emissions and noise levels regularly, prevent air, soil and noise pollution to minimize environmental impact and safeguard community health as part of ISO 14001 environment management system.

As FIT Voltaira Group, we will protect the ecosystem protection in key biodiversity preservation areas impacted by our operations and prevent illegal deforestation and avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters in compliance with legal requirements in our country of operations. Although our business does not involve animal testing, we respect the guiding principles formalized by the World Organization for Animal Health (OIE) concerning animal welfare.



12. Materials and Waste Management

Material and waste management is one of material topics of our environmental policy. As FIT Voltaira Group we are committed to applying sustainable resource management and packaging practices. Materials shall be reduced, recycled and reused before final disposal, in accordance with local regulatory requirements. Secondary materials shall be used in the products in line with quality and sustainability standards required by legal requirements and customer expectations to reduce carbon footprint and promote circular economy. Our employees are required to comply with waste segregation rules in the workplace and minimize waste production by reducing, reusing, and recycling materials whenever possible.

13. Chemical Management

It is essential that we implement clear procedures to identify and manage chemicals, ensuring their safe handling, movement, storage, use, recycling, and disposal in our operations.

We adhere to all applicable internationally recognized laws, regulations, and customer requirements regarding the identification, reduction, prohibition, or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

14. Responsible Supply Chain Management and Sourcing

As FIT Voltaira Group, we are committed to responsible sourcing of raw materials and minerals. We will conduct due diligence on our direct suppliers and subcontractors in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct and select business partners that comply with the practices of responsible business conduct. We promote transparency and traceability and use their best efforts to implement the ethical, environmental and social standards further along the supply chain. If our products contain one or more conflict minerals or high-risk raw materials, our employees must promptly report to the management the origin of the material throughout the supply chain up to the smelting works.

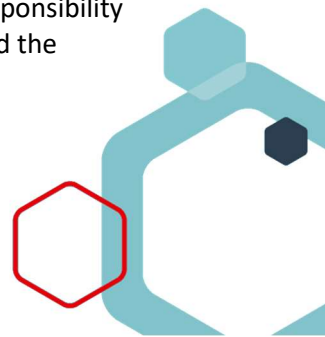
As FIT Voltaira Group, we will exercise due diligence on the sources and chain of custody of raw materials in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD), Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or an equivalent and recognized due diligence framework. FIT Voltaira Group requires all smelters for cobalt and conflict minerals (3TG) to be compliant with the Responsible Minerals Assurance Process (RMAP), RMAP Conformant or Active, or open to RMAP audit.

15. Professional Excellence and Innovation

Continual professional development is expected from all staff. This includes keeping up to date with the latest industry knowledge, techniques, and technologies. Employees are encouraged to innovate and present new ideas that contribute to the organization's efficiency, quality, and competitive edge.

16. Stewardship of Company Values and Assets

Reputation: Each employee contributes to the overall reputation of the company. This responsibility involves acting in a manner that builds and maintains the trust of clients, stakeholders, and the public.



Intellectual Property: Intellectual property, including patents and trade secrets, represents a critical company asset. Employees are responsible for safeguarding these assets and are strictly prohibited from using them for personal advantage or any activities not explicitly approved by the company. This duty encompasses avoiding unauthorized disclosure, ensuring intellectual property is only utilized in ways that directly benefit our business and align with company policies.

Physical and Digital Security: Employees are responsible for using all company assets, ranging from office supplies to digital databases, in a responsible manner and strictly for business-related activities. It is imperative to adhere to established security protocols to guard against any unauthorized access or the potential loss of these assets. This commitment ensures the integrity and confidentiality of both physical and digital resources, safeguarding our company's operational effectiveness and proprietary information.

17. Documentation and Process Management

It's essential to meticulously record all work-related activities, outcomes, and business interactions to ensure transparency, accuracy, and timeliness. Employees must adhere to standard operating procedures, continuously seeking opportunities for enhancement. Regular reviews of these procedures are critical to identify and implement potential improvements, thereby optimizing our operational efficiency and maintaining the highest standards of business practice.

18. Handling External Inquiries

Employees are required to refer all external inquiries, including those from the media to the company's designated spokesperson. This ensures that all information shared publicly is consistent with the interests of our company and complies with our established policies. Extreme care must be taken in this communication to maintain the integrity and consistency of our external communications.

19. Data Protection

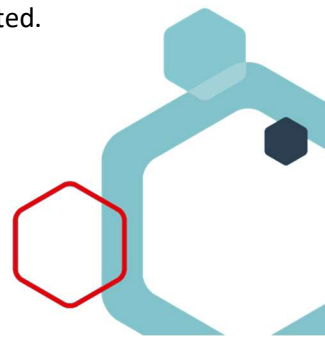
It is essential that employees strictly comply with data protection laws and our internal guidelines on confidentiality. Unauthorized disclosure of confidential information is prohibited. Confidential information includes any non-public data that could benefit competitors or harm the company, its customers, suppliers, or partners if disclosed. Employees must ensure that all confidential information is handled securely and only disclosed with appropriate authorization to protect the interests and integrity of the company and its stakeholders.

20. Substance-Free Workplace

The use or possession of alcohol or illegal drugs is strictly prohibited on company premises. Exceptions for alcohol may be made for specific company events, but responsible consumption is expected.

21. Anti-Corruption

As FIT Voltaira Group, we work against corruption in all its forms, including extortion and bribery, illegal payments, money laundering and improper advantage is not to be offered or accepted. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.



We comply with laws to prevent money laundering and we are following applicable, antitrust, customs duties and free competition laws, including but not limited to, the UK Bribery Act 2010, the USA Foreign Corrupt Practices Act (FCPA) and article 164 of the Chinese Criminal Code.

Our employees must inform and monitor all employees, agents, and others working on their behalf to never offer, promise, request, or receive anything of value, either directly or indirectly (i.e., via a third party), to improperly influence or perform any business decision or task or to gain any other form of unfair advantage. This covers dealings with both private individuals and government officials.

22. Financial Responsibility (Accurate Records)

Our employees are required to maintain accurate and complete financial records of all transactions related to their business with FIT Voltaira Group. All records must reflect the true nature of the transactions and be prepared in accordance with applicable accounting standards and legal requirements. False, misleading, or inaccurate records are strictly prohibited.

23. Disclosure of Information

We disclose information accurately and fully as required by law and in their dealings with FIT Voltaira Group.

This includes, but is not limited to, information related to products, services, pricing, and any other relevant matters. Misrepresentation or withholding of critical information is unacceptable and will be treated as a serious breach of conduct.

24. Fair Competition and Anti-Trust

We compete fairly and comply with all applicable antitrust and competition laws. Any form of collusion, bid-rigging, price-fixing, or other unfair competitive practices are strictly prohibited. Our employees are expected to foster an environment of fair competition and to avoid any activities that could result in an unfair advantage.

25. Counterfeit Parts

We expect our employees to implement measures to prevent the use and distribution of counterfeit parts. All parts and materials FIT Voltaira Group supplies must be authentic, genuine, and sourced from authorized channels. We are responsible for verifying the authenticity of their products and must promptly inform our customers if we become aware of any counterfeit parts in the supply chain.

26. Export Controls and Economic Sanctions

As FIT Voltaira Group, we comply with all applicable export controls and economic sanctions laws and regulations. This includes but is not limited to the laws and regulations of the countries of our operations.

Compliance with Laws: We must ensure that all products, services, and technologies provided to our customer comply with relevant export control and economic sanctions laws. This includes obtaining necessary licenses and authorizations before exporting, re-exporting, or transferring controlled items.



Prohibited Parties: At FIT Voltaira Group, it is prohibited to engage in any transactions with individuals or entities that are subject to economic sanctions or listed on restricted party lists maintained by applicable government and authorities.

End-Use and End-User Restrictions: We must ensure that their products, services, or technologies are not used for prohibited end-uses or by prohibited end-users as defined by applicable export controls and sanctions regulations.

Reporting and Recordkeeping: It is essential to maintain accurate records of transactions and comply with all reporting and recordkeeping requirements as mandated by applicable export controls and economic sanctions laws.

Notification of Violations: Our employees must promptly notify their managers and customers of any known or suspected violations of any trade, export control or economic sanctions laws related to their business.

Responsible Tax Practices: As FIT Voltaira Group, we pay all tax obligations, meet relevant payment deadlines, and fully comply with all relevant tax laws and accounting rules and regulations in the tax jurisdictions in which they operate. It is essential that our employees engage in an open and transparent manner with tax authorities about their tax liability.

27. Social Responsibility

We are aware of our responsibility to contribute to the development of communities where we operate. While the company is engaged in various philanthropic activities, it maintains a neutral stance on political matters. All donations and sponsorships are subject to management approval and should align with the company's mission, values, and strategy.

28. Partnerships

FIT Voltaira Group is performing due diligence when engaging with business partners, suppliers, and other stakeholders, aligned with OECD Due Diligence Guidance for Responsible Business Conduct. Third parties doing business with us must comply with ethical practices described in our Responsible Business Policy.

29. Verification

It is essential that the expectations outlined in our Responsible Business Policy are consistently met and we establish appropriate management systems to verify compliance with the requirements.

30. Reporting Responsibility

If our employees become aware of any incident or suspicion of any incidents and violations of all above topics and requirements covered which impact our business dealings with FIT Voltaira Group or involving our employees, they must report it to their managers immediately.



IV. GENERAL CONDUCT OF EMPLOYEES

Employees are expected to adhere to our Responsible Business Policy, embodying these guidelines in both action and spirit.

1. Characteristics of Employee Behavior:

Identification with Company Goals: Employees should be aligned with the organization's mission, vision, and strategic objectives. This means not just understanding the goals, but actively working towards achieving them.

Professional Expertise and Continuous Development: Technical skills and knowledge are vital. However, the pursuit of ongoing professional development is equally important. Employees are encouraged to partake in courses, seminars, and other learning avenues.

Desire for Improvement and Open-Mindedness: The status quo can always be improved. Employees are encouraged to provide constructive feedback and be open to receiving it as well.

Awareness and Initiative: Proactivity is prized. This includes awareness of one's work environment and taking the initiative to improve processes, troubleshoot issues, and share pertinent information with colleagues.

Commitment and Responsibility: Employees are expected to display a strong commitment to their roles and responsibilities, which includes punctuality, project completion, and dedication to quality work.

Performance and Quality Orientation: Success is a team effort but starts with individual performance. Striving for high-quality output is not just encouraged but expected.

Motivation: Employees should exhibit a high level of motivation which not only enhances their own productivity but also boosts the team's morale.

Adaptability: The ability to adapt to new tools, procedures, or company policies is important in today's fast-paced environment.

Teamwork: Building a sense of community through cooperation and trust is crucial. Teamwork makes the dream work, as they say.

2. Appearance:

General Dress Code: Clothing should align with the work environment to promote a sense of professionalism and mutual respect. Any issued uniforms or protective gear must be worn as required.

Non-Uniform Positions: In roles without uniforms, attire should remain neat, clean, and appropriate for a professional setting.

3. Work and Work Environment:

Effective Use of Work Time: Employees should focus on productivity and the achievement of organizational goals during work hours.



Maintaining a Clean and Functional Workplace: Responsibility for keeping the work environment clean, organized, and conducive to productivity.

Compliance and Participation: Adhering to internal regulations and actively contributing to a culture of safety and efficiency in the work environment.

4. Conduct During Business Trips

Professionalism, cultural sensitivity and ethical behavior: Employees must act with integrity, respect local cultures and ensure that all business transactions reflect the company's ethical standards. Disrespect for local customs, unethical business practices and any behavior that undermines the company's reputation is prohibited.

Privacy and Confidentiality: Protect sensitive company information and always maintain confidentiality. Disclosure of confidential or proprietary information to unauthorized persons is prohibited.

Avoid exploitation and demeaning activities: Adhere to the highest standards of personal conduct and support the Company's commitment to human rights and human dignity. Engaging in or promoting activities that exploit or degrade people, including but not limited to activities related to human trafficking or exploitation, is prohibited.

5. Conduct During Company Cooperation:

Professional Relationships: Every interaction should embody the highest standards of respect and professionalism, serving as a foundation for all company interactions.

Effective Communication: Timely and efficient sharing of information is essential to prevent delays and ensure smooth operations, emphasizing the importance of transparency and responsiveness.

Personal Accountability: Employees are expected to take full responsibility for their decisions and actions, especially when these have implications for colleagues and the organization at large, highlighting the value of integrity and reliability in professional settings.

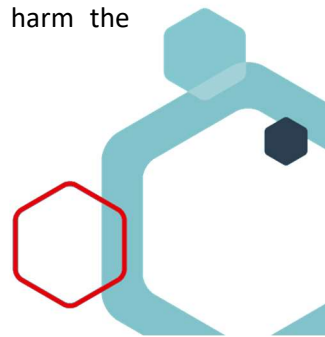
Ethical Interactions: All dealings should be transparent, fair, and respectful, honoring cultural differences and promoting mutual respect. Offering or accepting any form of bribe, participating in degrading entertainment, or any behavior that undermines the dignity of any individual is prohibited.

6. Communications:

Communication Style: Polite, clear, respectful and concise language is required for effective communication.

Approved Channels: All internal and external communications should go through designated channels to ensure information security and consistency.

Rumors and Defamation: In our commitment to fostering a respectful and trustworthy work environment, it is crucial that all employees refrain from spreading rumors or engaging in defamation. This includes making false statements or sharing unverified information that could harm the reputation of colleagues, the company, or our business partners.



We expect every member of our team to communicate with honesty and integrity, ensuring that their contributions to discussions, both in person and online, are based on fact and respect for the truth. Actions or communications that undermine the reputation and trustworthiness of our workplace are not tolerated and may result in disciplinary action.

7. Corporate Loyalty:

Commitment and Reputation: Loyalty to the organization extends beyond daily tasks - it includes acting in a way that enhances the company's reputation.

8. Conduct in Internal Relations:

Competence and Responsibility: Employees should be adept in their roles and responsibilities and should exercise this expertise in an ethical and responsible manner.

Cooperation: Withholding or delaying information, especially when it impacts team processes or decisions, is unacceptable.

Company Interests: Influencing decisions or actions that go against the company's goals is a serious breach of trust and is not tolerated.

9. Personal/ Romantic Relationships:

Disclosure and Professionalism: Employees involved in a personal or romantic relationship with a colleague are required to disclose this information to Global Voltaira Culture to ensure there are no conflicts of interest or issues of favoritism. Even after disclosure, professionalism must be maintained during work hours.

Manager-Subordinate Relationships: Relationships between managers and their direct or indirect subordinates are strongly discouraged due to the inherent power dynamics and potential for perceived or actual conflicts of interest. If such a relationship exists or develops, it must be disclosed immediately.

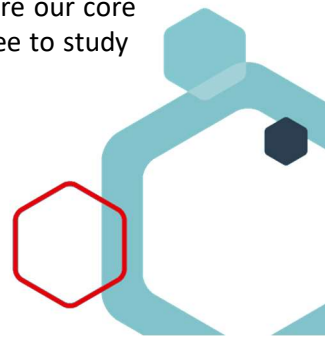
No Effect on Work: Personal and romantic relationships should not interfere with work responsibilities. Public displays of affection that might make others uncomfortable are to be avoided.

While the company respects the privacy of its employees, it also has a duty to maintain a comfortable and professional working environment for all staff. As such, discretion in personal and romantic matters is strongly advised.

Conflict Resolution: If a personal relationship creates tension or a conflict of interest, steps must be taken to resolve the issue in a way that is fair and transparent for all parties involved. This may include reassignment or other administrative actions, decided on a case-by-case basis.

V. COMPANY CULTURE

We, at FIT Voltaira Group, believe that our company culture is one of the priorities besides our expertise to be successful on individual and on company level. The following principles are our core values, and they should be observed all the time. It is the responsibility of every employee to study and apply them.



1. Trust

It is not easy to define trust - especially because it is not something you can demand - you can only earn it or work for it. No manager or employee is given trust just like that. It is a feeling that is built up. Trust is the belief and trust in the integrity, honesty, reliability, and fairness of a person and an organization. The foundation for trust between individuals within an organization is the positive experience of respect, politeness, acceptance of mistakes and shared/exposed weaknesses, support, authenticity, and honesty across all hierarchies and instances. When trust is intact, we will willingly contribute what is necessary for the company's success, through our commitment, talent, energy and honest thoughts toward our company. We cannot expect trust, but we can earn it and consider it one of our highest assets.

2. PASSION

Passion is an inner drive, not always explainable. It makes us want or do something. It is a positive feeling, which often leads us to very good result-bringing actions. When we feel passion, we are enthusiastic. Enthusiasm describes an enormous interest in connection with great joy and thus generates motivation. In teams, there should be a good breeding ground for enthusiasm. This in turn increases our commitment. Engagement is shown by a conscious and internally motivated commitment to be active for a cause or matter. If one is motivated, one commits oneself to something with everything one has.

3. ACCOUNTABILITY

Commitment is a social behavior between people. It refers to the consistency, perseverance or steadfastness with which a person - sometimes under difficult circumstances - stands by a promise made to another person.

It should be a mandatory prerequisite for fair and correct dealings with one another. In short, it can be equated with courteous friendliness. Reliability is best shown by carrying out what you have promised and what people want or need to rely on. Punctuality is considered an important quality of reliability. It can also be expressed through faithful, honest, efficient, and loyal behavior.

Accountability means that I take responsibility not only for tasks but primarily for the results or outcomes. In this context, everyone takes on a binding and reliable obligation to ensure that - within a certain framework - everything takes its best possible course. In doing so, everyone does what is necessary and right in each case so that no harm is done, and the goals set can be achieved.

4. OPEN-MINDEDNESS

Open-mindedness is an ability of "mental alertness". It enables us to be fundamentally open to what is foreign or different, either to accept it or to criticize it constructively and respectfully. Through this, we can promote and demand change and thereby take on challenges with courage and determination.

5. COLLABORATION

The foundation of every functioning cooperation is team spirit. This creates a basic optimistic attitude in each team member. Especially in difficult situations we can work well together and through this the probability of reaching our goals set increases. We have a good sense of community, through which we can complement each other with our qualities. This makes us successful.

Ideas and responsibilities are shared, which helps create a safe environment for everyone. This enables tasks to be completed carefully and thoroughly.



In a collaborative environment, we are honest with each other and helpful to each other. Helpfulness means that each person chooses to help another person without necessarily asking or being asked to do so in return.

VI. STANDARDS OF LEADERSHIP BEHAVIOR

Leadership carries a significant weight of responsibility. The ethical standards set by leaders not only govern their behavior but also deeply influence the organizational culture and employees' commitment to the company. Below are the specific characteristics and behaviors we expect from our leaders.

Core Expectations:

Exemplary Behavior: Leaders are expected to always set a positive example. Their actions should embody the principles of integrity, respect, and fairness, serving as a model for all employees to follow.

Alignment with Company Goals: Identification with and commitment to the company's strategic and business objectives are non-negotiable. The actions and decisions of leaders should reflect this loyalty.

Ethical Use of Power: Leaders should exercise their authority responsibly. Using their position to achieve personal aims, engage in self-dealing, or obtain unlawful advantages is strictly prohibited.

Accountability for Team Performance: Leaders bear the responsibility for their team's actions and outcomes. They should guide their team members towards fulfilling their roles effectively.

Resource Provision: To create optimal working conditions, leaders must ensure that all necessary resources—be it time, tools, or training—are readily available.

Transparent Communication: Leaders must clearly inform their team about the company's goals, how individual roles contribute to these goals, and any changes that may impact them.

Continuous Self-Improvement: In a rapidly evolving business landscape, leaders are expected to constantly upgrade their skills and adapt to new challenges.

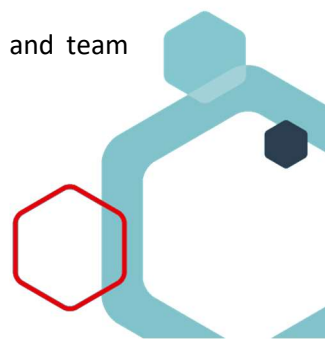
Adaptability to Change: Being open to and leading through change is crucial. Leaders should not only adapt but also foster a culture of adaptability within their teams.

Consistency and Dynamism: These are key traits that leaders should cultivate. Consistency offers a reliable framework for the team, while dynamism ensures that leaders can react effectively to new challenges.

Efficient Delegation: Leaders must allocate tasks according to team members' skills and capacities, striving for an equitable distribution of work.

Decisiveness: Quick and accurate decision-making is crucial. Leaders should also take responsibility for the consequences of their decisions.

Open to Feedback: Leaders must listen to and support initiatives from other leaders and team members, providing constructive feedback to nurture growth.



Performance-Driven Environment: A supportive environment where employees can excel should be the aim. Leaders should actively recognize and reward exceptional performances.

Effective Communication: Politeness, clarity, and sincerity in communication are essential. Leaders should engage in open dialogue and be receptive to feedback.

Constructive Criticism: Leaders should offer timely and constructive criticism and should be open to receiving feedback from their team members.

Fostering Career Development: Leaders should actively facilitate the professional development and career progression of their employees, doing so impartially and without discrimination.

Empathy and Understanding: Emotional intelligence is key. Leaders must show empathy towards their employees, understanding their concerns and motivations.

Special Note on Ambidextrous Leadership:

In our rapidly evolving marketplace, the ability to balance contradictory yet complementary demands are essential. FIT Voltaira Group values ambidextrous leadership, which refers to the capability to simultaneously encourage two contrasting kinds of behavior:

Explorative Behavior: Leaders should create an environment where innovative thinking, experimentation, and calculated risk-taking are nurtured. This helps the company in adapting to long-term changes and discovering new opportunities.

Exploitative Behavior: At the same time, leaders must focus on refining current processes, maximizing efficiency, and delivering consistent, high-quality results in the short term.

Ambidextrous leaders are adept at recognizing when to emphasize exploration over exploitation and vice versa, adjusting their leadership styles accordingly to meet the ever-changing requirements of the business landscape. Their ability to maintain this balance enables teams to be agile, adaptable, and effective in achieving both immediate goals and long-term vision.

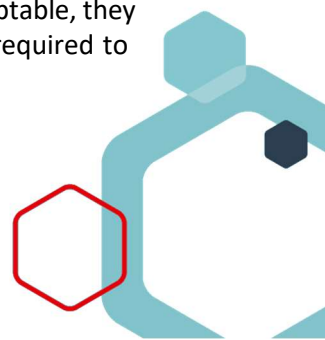
VII. OTHER CASES VIOLATING ETHICAL AND LEGAL CONDUCT

1. Conflict of Interest

Conflicts of interest pose a serious risk to the integrity of decision-making processes within the Company. Employees must avoid any activity or situation that could create, or appear to create, a conflict between their personal interests and those of the Company. All suspected or actual conflicts of interest should be promptly disclosed and managed appropriately.

2. Gifts, Entertainment, and Anti-Corruption

Employees must exercise caution when offering or accepting gifts, entertainment, or any form of favor from individuals or entities engaged with or seeking engagement with the Company. While nominal gifts and courtesy gestures that align with industry norms and local traditions may be acceptable, they must never compromise or seem to compromise our business integrity. Employees are required to discerningly refuse or report any offerings that exceed nominal value or could be perceived as attempts to influence business decisions unfairly.



This includes ensuring transparency by promptly reporting such instances to management, accompanied by a detailed description and the context of the gift or gesture, for further evaluation and guidance.

3. Safeguarding Company Reputation

Employees must refrain from actions and statements, online or offline, that could harm the Company's reputation or the well-being of its employees, stakeholders, or customers. This applies to all forms of communication, including social media and other online platforms.

4. Personal Gain at Company Expense

Using Company resources, reputation, or relationships to achieve personal gain is strictly prohibited. This includes the unauthorized use of Company assets, proprietary information, or intellectual property.

5. Confidentiality and Handling of Business Secrets

Employees are obligated to protect confidential business information and trade secrets, regardless of their form. Disclosing or using such information for personal gain or benefit is a severe breach of this obligation and may result in disciplinary action, up to and including termination.

6. Internal Competition and Non-Disclosure

Competition that disrupts teamwork or inhibits the Company's ability to function efficiently is unacceptable. Employees must disclose any additional employment or affiliations that may conflict with their responsibilities at FIT Voltaira Group, especially relationships with competitors.

7. Additional Employment

Employees holding additional jobs or contractual engagements must disclose them to their supervisors. Engaging in employment with a competitor, or any entity where sensitive information about the Company might be disclosed, is strictly prohibited.

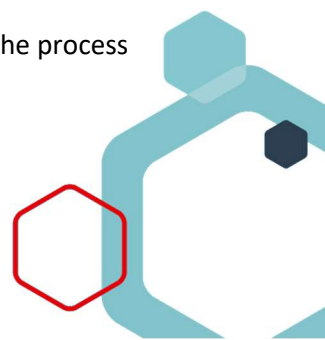
VIII. REPORTING OF ETHICAL MISCONDUCTS AND THEIR REMEDIES

Reporting Mechanisms

FIT Voltaira Group is committed to fostering an environment where ethical conduct is recognized and rewarded, and where lapses are identified and corrected. Any employee, contractor, vendor, or stakeholder who is aware of or suspects ethical misconduct has the responsibility to report it. Various channels for confidential reporting are provided, including anonymous hotlines, digital portals, or direct communication with supervisors, the Human Resources department, or the office of the Chief Ethical Officer.

Investigation

Once a report is received, it will be reviewed and investigated promptly and impartially. The process will involve collecting pertinent information, interviewing involved parties, and reviewing any applicable documents.



Confidentiality will be maintained to the greatest extent possible, consistent with the need to conduct a thorough investigation.

Remedies and Disciplinary Actions

If the investigation confirms that a violation of the Responsible Business Policy has occurred, appropriate disciplinary action will be taken. This may range from counseling and retraining to termination of employment or contractual relationships, and in some cases, legal action. The specific actions will depend on the nature and severity of the violation.

Whistleblower Protections

Employees who, in good faith, report ethical misconduct will not be subject to retaliation or adverse employment consequences. Anyone who retaliates against an individual for reporting a violation will be subject to disciplinary action, up to and including termination.

Documentation and Record-Keeping

All reports, investigations, and actions taken will be documented. These records will be kept confidential and stored in a secure manner, accessible only to authorized personnel.

IX. FINAL PROVISIONS

Obligation to Familiarize

All new managers and country leaders of the FIT Voltaira Group must read, understand, adhere to, and continuously implement the requirements of the Responsible Business Policy within their organization.

New employees will be briefed on the Responsible Business Policy during their orientation. Additionally, all employees are required to understand and adhere to the Policy annually.

Validity and Duration

This Responsible Business Policy is effective from 19.07.2024 and will remain in effect until explicitly withdrawn or superseded by a revised version.

Periodic Review

The Policy will be reviewed at least annually or more frequently as required by changes in laws, regulations, or company policy. Any revisions to the Policy will be communicated to all employees and relevant stakeholders in a timely manner.

Acknowledgment and Compliance

Employees are expected to sign an acknowledgment form confirming they have read and understand the Responsible Business Policy. This acknowledgment will be renewed annually or upon significant revisions to the Policy.



Violation Consequences

Failure to comply with this Responsible Business Policy may result in disciplinary action, up to and including termination, as well as potential legal consequences.

By adhering to this Responsible Business Policy, we reinforce the integrity and credibility of FIT Voltaira Group, safeguarding the long-term success of our organization and the well-being of all its stakeholders.

X. REFERENCES

1. Universal Declaration of Human Rights
2. United Nations Global Compact
3. International Labor Organization
4. RESPONSIBLE BUSINESS POLICY AND BUSINESS CONDUCT SMTP, INC.
5. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas
6. OECD Guidelines for Multinational Enterprises
7. Convention on the Elimination of All Forms of Discrimination against Women
8. UK Bribery Act 2010
9. USA Foreign Corrupt Practices Act (FCPA)
10. Article 164 of the Chinese Criminal Code
11. The Global Automotive Sustainability Guiding Principles
12. UK Modern Slavery Act
13. Automotive Industry Guiding Principles

