



Code of Conduct
for Business
Partners

Code of Conduct

Introduction

At FIT Voltaira Group (Voltaira), we strive not only for excellence in mobility solutions, but we are also committed to achieving the highest standards of ethics, quality, health & safety, environment, sustainability, and stakeholder and customer satisfaction in every aspect of our business, in alignment with our core values, applicable laws, as well as the expectations of stakeholders and governing authorities.

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

The Code of Conduct further delineates the behavioral expectations we have as an organization. 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.

Purpose of the Code of Conduct:

- To articulate and establish the ethical principles and behavioral expectations for our business partners that guide our work.
- To serve as a resource in making ethical decisions.
- To provide a framework for resolving ethical dilemmas and conflicts.

Scope of the Code of Conduct:

This Code which applies to all business partners, suppliers and third parties who are in a contractual relationship with Voltaira, whether current or former, paid, or unpaid, outlines our expectations from our business partners, is prepared based on the Voltaira's Code of Ethics and Code of Conduct for Employees, relevant international and/or national laws, regulations, and frameworks.

Sustainability is a crucial aspect of our partnerships with our business partners, suppliers and third parties who are expected to integrate our **compliance, ethical, environmental, and social** principles, and requirements in their contents of the Code of Conduct and contractual agreements. The principles and requirements of our Code of Conduct is also an integral part of our contractual agreements with our business partners and suppliers in the value chain.

Additionally, sustainability performance is a key factor in Voltaira's sourcing strategy. Suppliers must ensure that their own suppliers and subcontractors comply with applicable laws, regulations and conventions, and the principles outlined in this Code, unless these principles are already included in

their own supplier contracts. Suppliers are required to consistently perform due diligence on their suppliers in relation to Voltaira's business.

Our Global Values

Voltaira's global values are specific principles that are crucial to the company's culture and operational philosophy.

Trust

- **Building Trust in the Workplace:** We cultivate trust through integrity, honesty, reliability, and fairness. Trust is foundational in all our interactions and decisions.
- **Positive Workplace Experience:** We promote a culture where respect, acceptance of mistakes, and shared vulnerabilities are normative, enhancing trust across all levels of hierarchy.

Open-Mindedness

- **Encouraging Innovation and Diversity:** We value open-mindedness, fostering an environment where different perspectives are respected and considered. This value underpins our commitment to innovation and diversity.
- **Creating an Inclusive Culture:** We are committed to an inclusive culture where every individual, regardless of background, gender, or culture, could contribute and grow.

Collaboration

- **Team Spirit and Cooperation:** Collaboration is at the heart of our success. We encourage a team-oriented approach where ideas and responsibilities are shared, fostering a sense of community.
Empowering Teams: We strive to create a work environment that is creative, equal, and efficient, where open communication and cooperation drive our collective success.

Accountability

- **Commitment and Reliability:** Accountability is key to our operations. We stand by our commitments, demonstrating reliability and responsibility in our actions.
- **Proactive and Forward-Looking Approach:** We are dedicated to a proactive approach, striving for the best outcomes while being accountable for our decisions and their impacts.

Passion

- **Driving Enthusiasm and Commitment:** Passion is the driving force behind our actions. We foster an enthusiastic and committed work environment, where teams are motivated to achieve excellence.
- **Inspiring Innovation and Engagement:** Our passionate approach inspires innovation and engagement, bringing our vision to life and leading to exceptional outcomes.

Our Commitments

This Code of Conduct is a testament to our commitment to integrity, respect, fairness, and responsibility, guiding our actions and decisions to benefit society and the environment.

1. Ethical Leadership and Corporate Governance

- **Leadership Accountability:** Our leaders are role models, embodying and promoting our ethical standards. They are accountable for fostering an ethical culture and ensuring adherence to this Code.
- **Ethical Decision-Making Framework:** Decisions at all levels must be evaluated through an ethical lens, considering potential impacts on stakeholders and the environment.

2. Integrity in Business Practices

- **Honesty in Communication:** We commit to truthful, accurate, and clear communication in all business dealings.
- **Anti-Corruption and Bribery:** Strictly prohibiting any form of corruption and bribery, we maintain transparent and honest business practices, records are kept accordingly.

3. Respect and Fairness in the Workplace

- **Diversity and Inclusion:** We embrace diversity in all forms and ensure an inclusive work environment where everyone is treated with respect and dignity.
- **Equal Opportunities and Non-Discrimination:** We are committed to providing equal opportunities for all individuals who are in a contractual relationship with Voltaira, free from discrimination.

4. Compliance and Legal Integrity

Voltaira strictly adheres to all applicable laws, regulations, and industry standards, ensuring legal compliance in our operations. Additionally, our policies are developed based on international conventions, guidelines, principles, and standards, adhering to the Ten Principles of the United Nations Global Compact and the OECD guidelines. All business partners and suppliers shall comply with all applicable laws, regulations, and standards.

Social Standards

5. Human Rights

Voltaira is committed to align with internationally recognized human rights and social standards. Voltaira values, respect and support the protection of dignity, freedom, and human rights of individuals. We promote a working environment where business partners are treated with dignity and respect. We prohibit all kinds of violence, racism, sexual harassment, and behavior violating human rights in our business activities promoting respect and dignity. This includes protecting local communities, indigenous peoples, and human rights defenders. We expect our business partners to respect, adopt and actively implement these principles and establish a management system to manage human rights and working conditions. The

United Nations Guiding Principles on Business and Human Rights provide the underpinning for this.

6. Child Labor

Voltaira prohibits the use of child labor, and our business partners must ensure compliance with legal age requirements, including the rights of students. ILO Conventions No. 138 on the Minimum Age for Employment and No. 182 on the Elimination of the Worst Forms of Child Labor shall be observed. If child labor is identified, remediation shall be provided.

7. Forced Labor

Our business partners and suppliers must not engage in any form of forced or involuntary labor, including but is not limited to human trafficking, torture, and slavery or compulsory labor of any kind. All work shall be voluntary, and all individuals should be free to leave, subject to reasonable notices.

8. Freedom of Association

Our business partners must respect workers' rights to join unions and engage in collective bargaining. The right to strike shall be granted within the framework of statutory provisions and in accordance with ILO Convention No. 98.

9. Equal Opportunities

Our business partners must commit to a workplace free of harassment and unlawful discrimination on race, color, sex, age, religion, political opinion, national extraction, and social origin including hiring and employment practices such as wages, promotions, rewards, and access to training. ILO Discrimination (Employment and Occupation) Convention (No.111) shall be observed.

10. Fair Working Conditions

Voltaira requires business partners to enforce the right to fair labor conditions in accordance with applicable ILO conventions, treating employees with dignity and respect, providing fair compensation, complying with local regulations on working hours, breaks and vacation entitlements.

11. Occupational Health and Safety

Suppliers must prioritize the health and safety of workers and communities and ensure compliance with all applicable occupational health and safety laws. Manufacturers shall consider adopting and advancing an occupational health and safety (OHS) management system pursuant to ISO 45001 and take suitable measures to achieve the objectives of an OHS management system and to prevent occupational accidents and illnesses. Gender-responsive measures must be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.

Traffic Safety: Our business partners and suppliers are required to 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.

Our business partners and suppliers are expected to prepare and implement a traffic safety policy mandating seatbelt use for all driver and passengers, strictly prohibiting alcohol consumption and mobile device usage during work hours, enforcing rest/break regulations, and ensuring compliance with legal speed limits.

12. Protection from Eviction and Deprivation of Land

Our business partners undertake to refrain from any unlawful evictions. They must also refrain from any unlawful deprivation of land, forests, and waters via the acquisition, development, or other use thereof.

13. Security Forces

Our business partners are prohibited from using private or public security forces that result in torture, inhumane or degrading treatment, bodily harm, or the violation of the freedom of association.

14. Ethical Recruitment

Voltaira is committed to maintaining the highest standards of ethics and integrity in our recruitment practices. We aim to attract and retain a diverse and talented workforce while fostering a culture of fairness, respect, and inclusivity. We expect our business partners and suppliers to do the same. Recruiting practices conducted by our business partners must reflect values such as equal opportunity, non-discrimination, clear communication, honesty, respect, dignity, and confidentiality. No false promises should be made, and constructive feedback will be provided to candidate, upon request.

Environmental Standards

15. Environmental Protection

Voltaira is committed to reducing the environmental impact of our operations and we expect our suppliers to do the same. Our business partners must comply with all relevant national and international environmental laws, regulations and frameworks including animal welfare, manufacturers shall undertake to adopt and advance an environmental management system (EMS) pursuant to ISO 14001 and take measures to achieve ISO 14001 objectives and reduce its environmental impacts in an appropriate manner.

16. Climate Protection and Energy Management

Climate protection and decarbonization is an integral part of our environmental strategy. As Voltaira, we are focused on energy optimization and GHG (greenhouse gas) emissions and product carbon footprint reduction in line with Group Net Zero Goals. We expect our business partners to calculate their 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 emissions inventory shall be updated on an annual basis and GHG reduction goals of suppliers shall be validated by Science Based Targets Initiative. Voltaira expects its suppliers and business partners to make efforts to minimize the energy consumption and GHG emissions of their products and services, striving for sustainable solutions, including the establishment of energy management systems such as ISO 50001 in their manufacturing sites.

17. Water Management

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

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

Suppliers must 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. Additionally, we expect our business partners to establish and maintain comprehensive environmental management programs on biodiversity preservation, and measures to prevent and deforestation in compliance with legal requirements.

19. Materials and Waste Management

Material and waste management is one of material topics of our environmental policy. Our business partners and suppliers are expected to apply sustainable resource management 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 Voltaira's quality and sustainability standards to reduce carbon footprint and promote circular economy.

20. Responsible Chemical Management, Sourcing and Supply Chain

Business partners and suppliers must implement clear procedures to identify and manage chemicals, ensuring their safe handling, movement, storage, use, recycling, and disposal. Suppliers must adhere to all applicable 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.

As Voltaira, we are committed to responsible sourcing of materials. Our business partners and supplier are expected to perform due diligence to promote ethical sourcing practices in their material supply chains. Sourcing policies of business partners and suppliers must align with International Labour Organization (ILO), the United Nations Guiding Principles for Business and Human Rights (UNGPs), 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. Our business partners and supplier are expected to participate in raw material specific initiatives. Business partners and supplier must report to Voltaira immediately about the origin of the material in the

supply chain up to the smelting works if their product contains one or more of conflict minerals or high-risk raw materials.

Ethics & Responsible Business Standards

21. Stakeholder Engagement

- **Relations with Business Partners:** We build trust with our customers, business partners and customers by providing safe, reliable, and innovative products while ensuring data privacy, security, and data protection.
- **Supplier and Partner Relations:** We engage and work with suppliers and business partners who share our ethical values, promoting responsible business practices throughout our supply chain.

22. Ethical Marketing and Advertising

- **Honest Marketing Practices:** We commit to honest, fair, and responsible marketing and advertising practices, avoiding misleading information.
- **Consumer Rights and Safety:** We prioritize consumer rights and safety in all marketing and advertising activities.

23. Conflict of Interest Management

- **Identifying and Reporting Conflicts:** Business partners and suppliers are required to report any potential conflicts of interest, ensuring that personal interests do not conflict with the interests of Voltaira.
- **Avoidance of Conflicts:** We have clear guidelines to manage and mitigate conflicts of interest.

24. Protection of Company Assets and Intellectual Property

- **Proper Use of Assets:** Use of company assets, including intellectual property, shall be done responsibly and for legitimate business purposes only.
- **Confidentiality and Data Security:** Our business partners and suppliers shall ensure the confidentiality and security of sensitive information and proprietary data including cybersecurity. All suppliers must comply with applicable data privacy laws and have appropriate systems, training, and controls in place to ensure that personal data is only collected, used, stored, and deleted in accordance with these obligations.

25. Anti-Corruption & Bribery

Voltaira has zero tolerance for any form of corruption, bribery, illegal payments, and money laundering and committed its business and operations in an ethical manner. Business partners and suppliers must ensure compliance with anti-corruption laws and regulations applicable to the Company's operations, 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 business partners and suppliers 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.

26. Whistleblower Protection and Ethical Reporting

- **Reporting Mechanisms:** Business partners and suppliers are expected to establish secure and anonymous channels for reporting ethical concerns or violations and report them in line with regulatory requirements.
- **Protection Against Retaliation:** We protect whistleblowers from retaliation, ensuring their concerns are addressed fairly and promptly.

27. Training and Awareness

- **Continuous Ethical Development:** We encourage continuous learning and improvement in ethical practices, staying abreast of evolving ethical standards and challenges in our industry.
- **Ethics Training Programs:** We expect our business partners to conduct training programs their employees about Code of Conduct and their application in everyday business activities.

28. Financial Responsibility (Accurate Records)

Our business partners and suppliers must maintain accurate and complete financial records of all transactions related to their business with the Voltaira. 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.

29. Disclosure of Information

Our business partners and suppliers are required to disclose information accurately and fully as required by law and in their dealings with Voltaira. 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.

30. Fair Competition and Anti-Trust

Our business partners and suppliers must 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. Suppliers are expected to foster an environment of fair competition and to avoid any activities that could result in an unfair advantage.

31. Counterfeit Parts

We expect our business partners to implement measures to prevent the use and distribution of counterfeit parts. All parts and materials supplied to the Voltaira must be authentic, genuine, and sourced from authorized channels. Our business partners and suppliers are responsible for verifying the authenticity of their products and must promptly inform Voltaira if they become aware of any counterfeit parts in their supply chain.

32. Export Controls and Economic Sanctions

All suppliers and business partners are required to 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: Suppliers must ensure that all products, services, and technologies provided to Voltaira 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: Suppliers shall not 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: Suppliers 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: Suppliers are required 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: Suppliers must promptly notify Voltaira of any known or suspected violations of any trade, export control or economic sanctions laws related to their business with the Voltaira.

Responsible Tax Practices: All business partners and suppliers must 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. All suppliers are expected to be open and transparent with tax authorities about their tax liability.

33. Verification

Voltaira reserves the right to ensure that the expectations outlined in our Code of Conduct are consistently met and expects its suppliers and business partners to establish appropriate management systems to verify compliance with the requirements.

34. Reporting Responsibility

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

Conclusion

This Code of Conduct represents our unwavering commitment to ethical conduct. It serves as a guide for our business partners, and suppliers ensuring that Voltaira's values are reflected in all our actions and decisions. By adhering to this Code of Ethics, we reinforce the integrity and credibility of Voltaira, safeguarding long-term successful collaboration with and the well-being of our business partners and suppliers. Voltaira reserves the right to update the Code of Conduct when necessary.

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