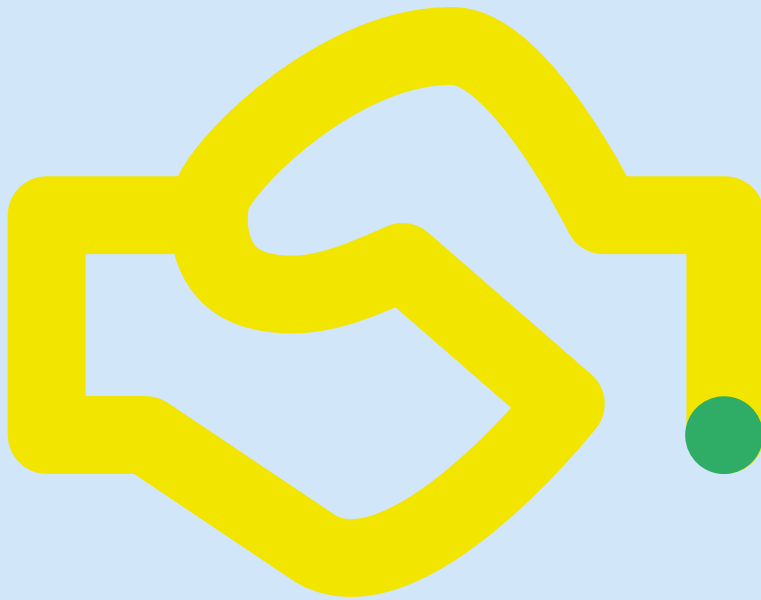


Code of Conduct



Code of Conduct of the QENERGY Solutions SE Group^{1*}

Introduction by the management

Q ENERGY sets out to change the way we produce, store, and use electricity to ensure a sustainable energy world for future generations and for planet earth!

Rooting from solar photovoltaic pioneer Qcells, our Holding Company Q ENERGY Solutions SE currently holds two subsidiaries Q ENERGY Europe GmbH and Q ENERGY France SAS, both of which are active in sustainable energy generation, storage and/or in selling clean electricity as an independent power producer (IPP). While the Holding Company and Q ENERGY Europe GmbH are located in Berlin, Germany, Q ENERGY France SAS is headquartered in Avignon and operates multiple offices across France.

It is essential for us as a company to aim for financial success. This is something that we owe to our employees, customers, suppliers, and shareholders alike. However, anyone who acts as a company also acts within a business framework with certain standards and mandatory rules. Yet everybody knows from their day-to-day work that rules must be observed. Wherever people pursue a common goal, their approach in working together shall be well organized in order to ensure continuous success. Cooperation requires a set of written rules which define guidelines and clear limits to our actions.

This Code of Conduct defines these rules, guidelines, and limits for Q ENERGY.

Most of the principles within this document are based on legal requirements, but also express how we wish to work together and with our business partners. They represent our company's ethical principles.

We are working to ensure that all employees can say with pride:
"I am a part of Q ENERGY."

Each employee should know that they make a crucial contribution to a particular product and together shape our company's identity. We want our employees to be passionate about taking on their responsibility. This can only be achieved on a permanent basis if everyone is committed to complying with the rules in this Code of Conduct. It is equally fundamental to us to cooperate with such business partners that value and respect the principles laid down in this document.

"Compliance is not an option, it's an obligation".

^{1*} As Holding Company Q ENERGY Solutions SE is the issuer of the following Code of Conduct that shall be applicable for all Group companies within the Q ENERGY Solutions SE Group (following Q ENERGY), both directly and indirectly controlled by Q ENERGY Solutions SE.

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1. About this Code of Conduct

Acting with integrity is not only a legal duty for our employees, but also an implicit and sincere requirement. We consider lawful conduct as the right way to act, expect such conduct from everybody and provide coherent, reasonable, appropriate measures to ensure that such lawful conduct and integrity is in place. This Code of Conduct expresses our position. It defines basic standards for behavior, provides guidelines for decision making processes and forms the basis for formulating special rules and instructions. As a basic principle, employees must be able to answer the following questions in the affirmative as a benchmark of our conduct:

- Do I act in the interest of Q ENERGY?
- Do I act in accordance with this Code of Conduct?
- Can and do I wish to assume responsibility for my actions, both on a personal level and as a Q ENERGY employee?

As part of the implementation of our compliance strategy, we have established a comprehensive Compliance Management System (CMS) to ensure that our company behaves ethically and in accordance with the law. The CMS also serves to prevent and avoid any misconduct or violations. This objective is directed at our top levels at Q ENERGY, namely the Management and Supervisory Board of the Headquarter company as well as the Management of the subsidiary companies, at all employees as well as at our business partners.

As part of our CMS, we have created our own specific operational compliance structure at Q ENERGY. The Compliance Officer shall be responsible for implementing and monitoring our CMS. The Compliance Officer as well as the local Compliance Representatives shall be available to all our employees and business partners for all questions relating to compliance issues.

Essential duties, guidelines, and values for the legally compliant actions of our company are derived from our Code of Conduct. Our Code of Conduct is substantiated by a large number of compliance guidelines and conduct requirements. Our company has also implemented numerous other internal processes for risk analysis and for effective monitoring of our CMS.

1.1 Area of application and compliance with the Code of Conduct

This Code of Conduct applies to all Q ENERGY employees in all our respective countries of operation. We expect our business partners to value, respect and comply with the principles set forth in this Code of Conduct.

Each Q ENERGY employee is obliged to adhere to the Code of Conduct rules and has the right to expect others to comply throughout their dealings with them.

Every one of us influences the Q ENERGY image through their appearance and actions. We act on the assumption that everyone at Q ENERGY will behave in an honest and correct manner in their dealings. However, we need to protect ourselves in case someone might not do so. If just one employee acts in an unlawful or inappropriate way, they can cause considerable damage to the company. For this reason, legal measures apply. Depending on the nature and seriousness of the infringement, breaches in the Code of Conduct can lead to consequences under employment law or even termination of employment, claims for compensation and prosecution under administrative and/or criminal law.

1.2 Meaning of compliance

Compliance refers to adherence to all statutory obligations and company rules, directives, and guidelines. Our Code of Conduct fulfills multiple functions in this respect. It is designed to offer all employees guidance and support in their work as well reflect our compliance culture and express this towards third parties as well as to promote its further development. We need binding rules and processes to ensure that the legal risks of our business activities are kept under control and that the company is protected from any form of malpractice on the part of individuals.

At the same time, we thereby live up to our moral and legal responsibility towards society. Furthermore, it is our continuous aim to align this Code of Conduct as closely as possible with the understanding that our employees have of themselves. Regulations that are relevant to compliance can be found in all areas of our company. It is important not only to recognize those of your own area as important, but also to understand what purpose relates to those of other areas and to follow them.

1.3 International agreements

In addition to the laws and regulations in individual countries, a series of agreements and recommendations from international organizations is in place that guide us. They are primarily intended for the respective member states, but also serve as important guidelines for an international company. Q ENERGY therefore attaches great importance to ensuring that our actions as a company conform with such guidelines. These particularly include:

- [The UN's General Declaration of Human Rights \(1948\)](#) and the [European Convention for the Protection of Human Rights and Fundamental Freedoms \(1950\)](#)
- The International Labour Organization (ILO) [Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy](#) (adapted 1977 amended March 2017) and the ILO [Declaration on Fundamental Principles and Rights at Work](#) (adopted 1998 amended 2022)
- The OECD [Convention on Combating Bribery of Foreign Public Officials in International Business Transactions](#) (2021)
- OECD Guidelines for Multinational Enterprises (2000)
- Transforming our world: [The "Agenda 2030"](#), New global Sustainable development Goals, held in New York, September 2015
- [UN Convention against Corruption \(UNGASS 2021\)](#).

1.4 Different law systems

Compliance is an international requirement. Compliance requires from us as a company to conform to the respective statutory regulations in the different countries where we operate. Within the Germany based Headquarter of Q ENERGY Solutions SE, German law takes precedence for the company. However, since we operate on an international level, we must comply with the respective national statutory regulations at each of our locations. In international transactions, each case needs to be studied carefully to determine which law system needs to be observed.

Each employee must acquire appropriate knowledge of the requirements relating to their duties sufficient to enable them to recognize potential dangers and to know when to seek advice from the respective Legal Department on specific company policies and procedures. In the event of doubt, the Compliance Officer/ Compliance Representative or Legal Department of the respective Group company should be consulted on such matters.

2. Basic principles for our Code Of Conduct

2.1 A constructive approach

At Q ENERGY, we are convinced that it is worth our while to work together in a constructive, trusting manner on all levels. This is the way to achieve the best possible results. Being involved in a successful work project motivates people and increases their willingness to perform. If our partners derive benefit from our work, they will be enthusiastic about working together with us again in the future. We provide long-term prospects for our clients and thus achieve profitability for all those involved. We create values for our employees and our shareholders. More than anything, we also play a part in creating a world which is supplied with clean energy.

We encourage our employees' initiative and their willingness to act. Achievement and dedication should be worth their while. As a basic rule, everyone must take responsibility for their own actions and at times, consequences are inevitable. Wherever people act and make decisions, errors may occur. It is essential to learn how to deal with such errors. Recognizing errors in the present helps us to avoid them in the future.

We encourage every person to admit to errors and address problems, as a problem which is not acknowledged may result in serious consequences.

To achieve success in our business, we also need to set ambitious goals and achieve them. At the same time, it must be possible to deal with any problems arising in an open, clear-cut way and find a solution. Unachievable or incorrectly established goals are of no use to anyone. That is why we encourage all employees to point out in good time when it may not be possible to achieve targets. This is the only way to ensure that we have enough time and the opportunity to deal with difficulties and find solutions. We aim to create a culture of communication where well-structured arguments and reason matters and where we can learn from one another. We should all take every possible effort to set a good example.

2.2 Responsible corporate management

Q ENERGY is a commercial enterprise focused on increasing its value on a sustainable basis and on achieving its business goals.

We take responsibility for our environment. For us, the environment also includes people, society, and future generations in addition to nature. If we lead the field of advanced technology, we will be able to remain competitive and pursue our ambitious goals further. That is why we permanently strive for excellent results and set stringent quality requirements for our products and solutions. For us, progress, economic success, and social responsibility go hand in hand.

2.3 Sustainability

We are conscious of the shortage of natural resources and of our social responsibility towards future generations. For us, sustainable development implies combining the preservation and protection of the environment with financial well-being and social justice. We use the principle of sustainability to guide us in developing our products and processes and attach particular importance to social acceptance and mutual respect. We have committed ourselves to different international agreements in which generally accepted codes of behavior are laid out. We also expect our business partners to abide by these codes.

2.4 Human dignity, human rights and nondiscrimination

Our company is founded on mutual respect. With Q ENERGY, all kinds of people work together in a constructive way. We respect the personal dignity of each individual and are committed to safeguard human rights. We will not tolerate the exploitation of children and young people due to child labor or forced labor of any type. We expect this approach also from our business partners.

We treat each other with respect and are loyal and fair towards one another. We do not tolerate any discrimination, especially on the grounds of nationality, ethnic origins, culture, religion, skin color, disability, age, gender identification, sexual orientation, political orientation, or gender. Likewise, we do not tolerate any sexual harassment or other personal attacks on individuals within the company or regarding our business partners. We promote the professional and personal development of our employees and respond with a flexible approach to individual personal circumstances. Balancing work with family life is important for us; we expressly and actively support such an endeavor. Merely satisfied employees strive to find innovative and creative solutions. This shall remain our benchmark.

2.5 Management culture and managerial responsibility

An important prerequisite for compliance is exemplary conduct on the part of our management. Each individual manager acts as a role model and must behave as such. Good leadership involves ensuring awareness and promotion of correct, lawful behavior at all times, an ethical standard which managers should exemplify through their own conduct. In other words, the “tone at the top”^{2*} must be right for the rest to follow.

We expect our managers to trust their employees. Our managers should allow their employees as much personal responsibility and freedom as possible, while also offering them guidance. It is part of the managerial role to define and establish clear rules and processes, inform employees about these rules and processes as well as check their compliance. We also consider transparent, honest communication a managerial responsibility. When a manager delegates individual tasks, they still bear responsibility for the conduct of their employees. Supervision is a managerial responsibility and cannot be delegated. Of course, employees shall not absolve themselves of their own responsibility either.

^{2*} Tone at the top refers to how an organization's leadership creates an ethical (or unethical) atmosphere in the workplace.

3. Dealing with business partners

3.1 Contractual basis

Trust is the basis of a successful business. We place trust in our business partners and we ourselves are trustworthy partners. As a basic principle, when working with business partners or other parties, we always base our partnership on written/textual contracts or agreements (this encompasses contracts and agreements including electronic signature in accordance with legal and internal requirements equally), to ensure that there is legal protection and clarity. Changeable parts of contracts such as product specifications, prices and supplementary agreements are also set out in writing/in textform and signed in accordance with legal and internal requirements without any exceptions.

Four-eye principle

This is a special internal check procedure designed to prevent an employee involved in a transaction (the so-called first signatory) from taking important decisions or carrying out crucial activities on their own. The four-eye principle ensures that another person, independent of the first signatory, checks and signs or approves the process or document, thus guarding against errors and abuse of powers of authorization.

3.2 Competition law, antitrust law and foreign trade legislation

Fair competition

For Q ENERGY, fair competition is a fundamental part of its business. It is the basis for healthy development and social benefit for the market. We convince our customers to engage our services and to buy our products based on our quality and price-performance ratio. Each employee is obliged to comply with the rules of fair competition. These rules have been set out in numerous laws and regulations worldwide. Infringements may lead to severe penalties and fines, not only for the company concerned but also for the people involved. There is a risk of civil claims for damages. Thus, everybody should keep in mind that any breaches may damage the company's image considerably.

Competition and antitrust law

We shall never enter into agreements with our competitors which are intended to distort or influence competition. It is important to remember that the decisive factor is not the external appearance of an agreement, but its intention. Even in the case of informal, supposedly private meetings with a competitor, the following topics must not be discussed under any circumstances:

- prices, production output, capacities, distribution channels, profit margins,
- rigging of bids in response to invitations to tender,
- dividing up of customers, regions or production programs, non-competition.

Not only explicit agreements but also mere exchange of information with competitors may represent an infringement of competition law.

No employee shall at any time or under any circumstances enter into an agreement or understanding, written/textual or oral, express, or implied, with any competitor concerning prices, discounts, other terms or conditions of sale, profits or profit margins, costs, allocation of product or geographic markets, allocation of customers, limitations on production, boycotts of customers or suppliers, or bids or the intent to bid or even discuss or exchange information on these subjects. In some cases, legitimate joint ventures with competitors may permit exceptions to these rules as may bona fide purchases from or sales to competitors on non-competitive products. These prohibitions are absolute and strict observance is required. Collusion among competitors is illegal, and the consequences of any violation shall be severe.

Although the spirit of these laws, known as "antitrust", "competition", or "consumer protection" or unfair competition laws, is straightforward, their application to particular situations can be quite complex. Employees who deal with product imports and exports must be particularly careful to ensure that Q ENERGY complies with all applicable rules and regulations.

Trade controls

The import and export of goods, services, hardware, software, and technology (even by email) are sometimes subject to complex regulations, such as:

- import laws and regulations, including customs laws,
- economic sanctions, such as embargos,
- export control and foreign trade laws.

3.3 Preventing and combatting corruption

We compete on the market by presenting good arguments in favor of our products. We win contracts thanks to quality, benefits for our customers and reasonable prices. Corruption detracts from our arguments and those of all fair competitors. That is why we support all national and international efforts aimed at preventing and eliminating corruption. Bribery and corruption will not be tolerated under any circumstances.

Corruption / bribery

Any person who takes advantage of a position of trust or power to obtain an advantage to which they have no legally justified claim is to be considered guilty of corruption. A position of power may arise as a result of a role that a person plays in administration, justice, business, or politics. The acquired benefit may be material, such as money or tangible assets, or immaterial, such as preferential treatment. The term “corruption” also refers to the more closely defined terms bribery and bribability, acceptance of benefits and granting of an undue advantage.

By accepting or granting benefits in such a way without any legal basis, the parties involved violate moral standards and/or disregard their duties as an official or a professional. It makes no difference whether the benefit was offered or requested. Corruption in all its different forms is a criminal offence in Germany and most other countries.

3.3.1 Offering & granting benefits (in particular invitations & gifts)

It is strictly forbidden to offer, promise or grant benefits to decision makers in business partner companies to obtain contracts for Q ENERGY in any unlawful way or influence the objectivity of business decisions.

We wish to maintain a good relationship with our business partners and clients. That is why it is permitted to offer invitations to lunches, dinners, or events. It is crucial that such invitations are appropriate and not extravagant. As a basic principle, Q ENERGY requires that a gift which is not moderate or appropriate, or even just appears not to be so, must be declined. Every country has different standards and laws which determine whether a gift is socially acceptable or not. For this reason, detailed, country-specific information, maximum limits or guidance values and regulations should be requested from the Compliance Officer/ Compliance Representative and Legal Department in the respective country's organization.

There is no objection to promotional gifts or other gifts for business partners provided their value does not exceed a reasonable amount. Reasonable invitations and gift for occasions such as birthdays or Christmas and other religious festivals are generally acceptable. Gifts must not put the receiver in a position where they feel bound by obligation.

A good benchmark for such cases is the so-called in-public test, meaning:

Would you tell others or speak about the gift in public without giving it a second thought?

If you feel that nobody should know about a particular gift, then it is not moderate or appropriate.

As a basic principle, giving money and services as a gift is strictly prohibited.

You should avoid even merely giving the impression that you expect a service in return. In this respect, gifts and invitations are prohibited before and in connection with the signing of contract, since giving such a benefit may influence the receiver's decision-making process in an unlawful way.

Donations and sponsorship

Donations deposited in private bank accounts and donations which may damage Q ENERGY image are prohibited. The receiver's aims and Q ENERGY corporate values must not be inconsistent with one another. Political donations to individuals, parties or other organizations are not permitted. Contributions to trade associations or membership fees for organizations which serve our business interests are not regarded as donations.

Sponsorships

Q ENERGY may provide money or goods for an event organized by third parties as part of a sponsorship deal.

Consultants and agents

Q ENERGY also uses consultants and agents, such as sales agents. Such persons may initiate, arrange, and process business transactions on our behalf and receive commission or payment in return for their services. Sales agent activities include finding business opportunities, showing potential customers what Q ENERGY is capable of, building up contacts and providing help in dealing with government authorities. Consultants and agents can provide substantial support for our sales and marketing in international business operations.

However, if they use illegal business practices, this also damages our reputation. We therefore only work with distribution partners who comply with all statutory regulations. We take specific precautionary measures when entering into agreements with consultants and sales agents to prevent illegal business practices.

3.3.2 Working with public officials and government contracts

Particularly strict rules apply in the case of dealings with public officials. These include government officials and other employees in public administrations, other public institutions, public sector companies and international organizations as well as candidates for political office and official representatives and employees of a political party. Political parties are also public officials in this respect.

Q ENERGY competes for government contracts worldwide and takes strict care not to influence the decisions of public officials in any unlawful or undue manner. The type of post which can be considered a public position varies greatly from country to country. In doing so, we comply with all laws and regulations regarding public procurement. We act transparent, honest, and lawful.

All Q ENERGY employees are strictly forbidden to offer, promise or grant benefits to a public official to secure an official contract or preference in a business transaction. Employees must also refrain from giving gifts and making invitations of minor value. You may be committing an offence in terms of granting an undue benefit. Exceptions in individual cases must be approved by the Compliance Officer/ Compliance Representative and/or Legal Department in the respective country's organization.

3.3.3 Requesting and accepting benefits, invitations, gifts and similar

We maintain a good relationship with our business partners and clients. That is why it is permitted to accept invitations to lunches, dinners, or events from time to time. This particularly applies to official occasions and holidays, or if you wish to celebrate a joint success. In doing so, it is essential to take into account the maximum limits and regulations of the country in question.

3.4 Business relationships with suppliers

Q ENERGY purchases supplies based on need, quality, service, price and terms and conditions. The policy is to select significant suppliers or enter into significant supplier agreements through a competitive bid process where possible. Under no circumstances should any employee, agent or contractor attempt to coerce suppliers in any way. The confidential information of a supplier is entitled to the same protection as that of any other third party and must not be received before an appropriate nondisclosure agreement has been signed.

A supplier is generally free to sell its products or services to any other party, including competitors of Q ENERGY. In some cases where the products or services have been designed, fabricated, or developed to our specifications, the agreement between the parties may contain restrictions on sales.

As a basic principle, we expect our partners to

- comply with all applicable laws,
- desist from any form of corruption,
- observe the human rights of their employees,
- comply with laws and relevant international standards prohibiting child labor and forced labor,
- assume responsibility for health and safety towards its members of staff,
- comply with relevant national laws and international standards regarding environmental protection, and
- ensure that these values are also respected throughout their own supplier chain.

4. Loyalty to QENERGY – handling conflicts of interest

A conflict of interest occurs when an individual finds themselves in a situation where they must choose between two or more incompatible interests. Such a situation often arises if an employee acts in their own personal interest and in conflict with their interests in a professional capacity. Personal interest then prevents them from acting in the best interests of the company.

4.1 Avoiding conflicts of interest

All employees must ensure that they make business decisions in the best interests of the company.

Any conflict of interest, or even the appearance of such, must be avoided at all costs. As a basic principle, business contacts must not be used for private business transactions or the purchase of goods or services for personal use.

4.2 Related parties

As a rule, employees should avoid entering business relationships on behalf of Q ENERGY relatives or other close relatives or with companies in which relatives or close relatives hold a key position (so-called related party transaction). Relatives in this sense are spouses, siblings, children, parents, grandparents, uncles and aunts, nephews and nieces, cousins. This also applies if the relatives are step-relatives or in-laws of the employee concerned. Close relatives in the sense are persons with whom the employee concerned lives in marriage-like (regardless of gender) or family-like relationships.

5. Handling company property

We handle company resources in an economical and responsible way, while also taking care with expenses and financial resources.

6. Finance & accounting

6.1 Documentation and financial reporting

In order to comply with their statutory accounting obligations and contractual reporting obligations, the companies of Q ENERGY must handle all business transactions:

- documented completely, accurately, truthfully and using the right systems and
- accurately and timely forward to the competent authorities.

6.2 Processing of payment transactions and combating money laundering

As a basic principle, payment transactions are not made in cash, but are handled through money transfers. Cash payments or other unusual payment methods may aid and abet illegal activities such as tax evasion, corruption, fraud, embezzlement, or money laundry. We wish to avoid any association with such illegal activities when processing payments.

Money laundering

If “dirty money” from criminal activities is introduced into legal circulation, through cash payment, for example, this is referred to as money laundering. During this process, money is camouflaged, thus appearing to be from a legal source and the source or the real identity of the original owner is concealed as a result. Corruption is a major source of such “dirty money”.

7. Protection and passing on information

7.1 Security of IT systems

IT security comprises the protection and security of information and data, the resources in the information network as well as the protection of the employees. It also expressly includes compliance with external and internal regulations and standards. At Q ENERGY, the following criteria have been defined as the general aims of information security and, in particular, IT security.

- confidentiality of information,
- availability of information and resources,
- integrity of information and resources, and
- binding character (non-repudiation) of transactions.

7.2 Protectable data, rights, storage, records – intellectual property, data protection, secrecy and protection of third-party rights, insider trading, short selling, storage of data and documents, records, legal hold

Our knowledge and our skills form the basis of our business success. Ownership of industrial and intellectual property rights, such as patents, utility patents and brands, embodiments, developments, designs, inventions, and copyrights play therefore an exceptional role in our company.

While developing products, technologies, and production processes, we gain specialist knowledge which may secure us a competitive advantage over other suppliers in our market segment. This basis for innovation and technological lead must be protected. When appropriate, a patent is filed for inventions, and they receive special protection as a result.

We respect the rights of third parties to their intellectual property. In the event that we wish to use them, we apply for a license wherever possible and carefully comply with license conditions and validity periods. We expect such approach also from our business partners.

Specific rules which have been established for visitors and employees of external companies serve to protect our intellectual property among other things. This includes items such as limited access authorizations or the need to obtain a special permit for photography.

Data protection and protection of third-party rights

We are aware of the risks which electronic data processing and electronic communication entail with regards to data security and the protection of privacy. We comply with all corresponding statutory regulations in this respect. Personal data may only be acquired, processed, or used if there are clearly defined, legitimate reasons for doing so. It must be ensured that personal data is safely stored at all times and is only forwarded to other persons if the necessary precautionary measures have been taken. It must be clear to the parties concerned how and for what purpose their personal data is being used. We are obliged to ensure that they are able to exercise their right to information, rectification, objection, suspension, and deletion of their data without any hindrance.

The processing of personal data by other companies, i.e., outsourced data processing, is subject to special rules.

Confidentiality and protection of business secrets

Business information shall be treated as confidential.

Q ENERGY and its employees must cooperate with appropriate government inquiries and investigations. In this context, however, it is important to protect the legal rights of the Q ENERGY with respect to its confidential information.

The obligation to maintain secrecy continues to apply even after employment relationships have ceased. The same applies to information concerning suppliers, customers, employees, representatives, consultants and other third parties. There is also an obligation to handle such information responsibly and protect it in accordance with statutory and contractual requirements. It is forbidden to acquire secrets of a third party and use them without authorization.

We take special care to handle the confidential information of others responsibly. We handle such confidential information in accordance with applicable laws and our agreements with such third parties. We expect such approach also from our business partners.

Obligations with regard to insider trading

In the normal course of business, officers, directors, employees, agents, contractors, and consultants of Q ENERGY may come into possession of significant, sensitive information. The above-mentioned persons are prohibited from profiting from the entrusted information by passing it on, selling it or any other such activity, or from passing it on to third parties for the purpose of generating profit. The purpose of this policy is to remind employees of their legal responsibilities and to make clear that failure to comply with the above rules may result in violations of company policy and legal provisions.

7.3 Storage of documents and data

There are statutory and/or official regulations which require us to store a large number of business documents beyond the period of time when they are in direct use. The applicable period for safekeeping varies from case to case and on occasions may be very long.

Documents and data that are no longer required and whose storage periods have expired shall be destroyed immediately. The protection of the intellectual property contained or documented in the documents, confidentiality and the requirements of data protection must be maintained at all costs in this phase as well. The only exception shall be if all required documents are available in an ongoing legal process. In that case, there is a legal prohibition on destroying relevant documents even after the legal retention period has expired.

Maintaining and managing records

The purpose of this policy is to set forth and convey Q ENERGY business and legal requirements in managing records, including all recorded information regardless of medium or characteristics. Records include paper documents, CDs, computer hard disks, e-mail, or all other media. The Company is required by local, state, federal, foreign, and other applicable laws, rules, and regulations to retain certain records and to follow specific guidelines in managing its records.

Records on legal hold

A legal hold suspends all document destruction procedures to preserve appropriate records under special circumstances, such as litigation or government investigations.

Records or documents that have been placed under a legal hold must not be destroyed, altered, or modified under any circumstances.

7.4 Corporate communications and public relations

A positive perception of Q ENERGY in the public eye plays a considerable role in ensuring the success of our company. We take very good care of our corporate image. This applies to all written, verbal, and electronic forms, such as advertising material, presentations, or talks. Our carefully cultivated corporate image is consistent with our overall corporate culture. We take an open, honest, respectful, and credible approach both internally and externally. This also applies to all our communications – face-to-face meetings, telephone calls and written statements on paper and in emails. Maintaining this good style of communication is the responsibility of every employee. Q ENERGY is not only perceived through corporate communications, but through every single external contact.

We particularly welcome it when our employees are involved in public offices on a municipal or national level.

8. The environment, safety and health in the workplace

8.1 Environmental protection and technical safety

For Q ENERGY, environmental protection is not only a statutory obligation, but also one of the key reasons for its existence. Through our business activities, we seek to promote a clean, sustainable source of energy supply. In this way, we contribute to combating climate change and take responsibility for the environment and for future generations. At Q ENERGY, products, investments, manufacturing processes and work conditions are based on the principles of sustainability.

Q ENERGY complies with all applicable environmental regulations. We obtain all necessary permits and licenses in good time and ensure that any requirements or necessary conditions are met. We wish to cooperate with supervisory authorities effectively on a basis of mutual trust.

We encourage our employees to actively assist in improving all existing environmental protection measures. Whenever employees point out areas where energy can be saved or resources in general can be conserved, we will try to take suitable measures wherever possible. Environmental protection is the duty and objective of the company and each individual employee.

8.2 Health and safety in the workplace

We take our responsibility for the health and safety of our employees in the workplace very seriously. This applies to all departments in our company. At the same time, employees themselves are also obliged to take care at all times. Anyone who plans ahead and assesses the risks for themselves, and their colleagues makes a considerable contribution to ensuring that work conditions are safer. Health and safety in the workplace are regulated by a large number of laws, regulations, and internal instructions. These must be complied with.

9. Waiver

Any waiver of the provisions of this Code of Conduct ordered by the Management of any of the group companies or any of their executive staff members of this Code of Conduct must be reviewed in advance by the respective Legal Department and approved in writing by all of the respective company's managing directors and must be disclosed without delay.

10. Our compliance organization

Each employee bears responsibility for ensuring compliance.

Our Management is required to create the organizational structures for compliance in their departments and to introduce suitable processes.

Our compliance management fulfills the following tasks:

- Risk assessment for key processes with regard to compliance issues.
- Advisory for the Management of Q ENERGY Solutions SE, departments and international subsidiaries when implementing solutions.
- Implementation of training courses and provision of training documents.
- Development of overarching company-wide processes and provision of key systems for compliance issues.
- Investigation of incidents and response to possible infringements.

The Compliance Officer receives all incoming information and tips regarding compliance relevant for Q ENERGY Solutions SE and follows up with due care.

All incoming information is treated as strictly confidential.

11. Dealing with complaints

Q ENERGY has established a whistleblowing system in accordance with legal requirements that enables confidential, fair, and thorough handling of whistleblowing and complaints from internal and external reporting persons.

11.1 Whistle blowing system

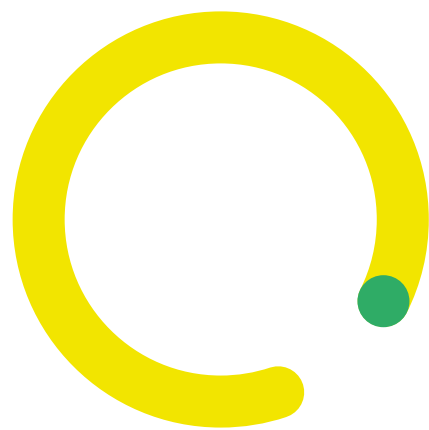
A key element of our CMS is also the establishment of a web-based internal whistleblower system. All employees of our company as well as our business partners (suppliers and customers, etc.) may use this system to report any misconduct or violation of laws, our Code of Conduct as well as our company guidelines - if desired, completely anonymously.

Our web-based reporting system is called Hintbox and may be found [here](#) (English and French version available).

11.2 Hintbox

How does the Hintbox work and what happens with the reports?

- All employees and our business partners (customers and suppliers) are entitled to submit reports.
- You can, of course, submit your report anonymously by not providing any personal information that could identify you. However, the clarification of a misconduct may be more effective if you provide your contact information. As a matter of principle, your identity will not be disclosed to anyone other than the Compliance Officer/person designated to receive the report with their department and the competent departments and bodies that need to be involved without your express consent (exceptions may apply in particular in the case of official investigations or legal proceedings).
- Only the Compliance Officer/person designated to receive the report with their department will be informed of your report in a first step and will accompany the further essential steps of the clarification. Non-authorized employees of the company will not have access to your report. All information in your report will be kept strictly confidential.
- When you submit a report, you can view the status of your report in your login area. This login area also gives the Compliance Officer and their department the opportunity to contact you confidentially if there are any queries. You also have the opportunity to provide additional information at any time. You will receive login data for this purpose after submitting your report. These login data (username and password) are generated automatically. Please remember these login data. This login area is of course also available to you if you submit your report anonymously. Your anonymity will be preserved.
- The purpose of the whistleblower system is to receive reports about any misconduct, infringements, violation of laws, the Code of Conduct and/ or our internal guidelines. For general complaints or questions about our products or product warranties, please use our general contact address.
- Please make only those reports where you are confident that the facts reported are true. Please refrain from deliberately untruthful statements or untrue facts, as this may result in criminal liability for the whistleblower. In cases of doubt, please mark your report as an assumption or statement by a third party.
- After receipt of your report, you will receive a confirmation of receipt in your login area. Subsequently, within a maximum of three months after receipt of the report, you will receive feedback from the Compliance Officer with their department on the follow-up measures planned or already taken and the reasons for these follow-up measures (such as internal inquiries or investigations). If you have provided your e-mail address, you will also be informed by e-mail of any current processing status in your login area.



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