

# Code of Ethics

Digital Charging Solutions Group

DIGITAL  
CHARGING  
SOLUTIONS







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# Foreword

We at Digital Charging Solutions GmbH including branch offices and subsidiary companies, jointly the "DIGITAL CHARGING SOLUTIONS Group" (DCS), are committed to a high standard of ethical behavior and believe that this is a key factor for the sustainable business success. Our Code of Ethics shall guide the behavior towards each other, our customers, our business partners and all other parties that we are involved with to ensure our reputation as a trustworthy and reliable business partner in the mobility sector. This Code serves to clearly express our commitment to compliance with applicable laws and regulations as well as with our policies and standards of ethical behavior and it applies to all of our employees and board members.

In addition to this Code, each company within the Group has its own internal policies that all of its employees are required to follow. All policies should be reviewed and, if necessary, updated regularly. However, we are aware that it is impossible to regulate behavior through policies alone and we strive to always encourage a culture characterized not only by excellent performance but by ethically correct behavior at all times and in all situations. We expect all of our employees, especially the management level to lead by example, to always comply with our internal regulation and to live up to our ethical standards and cultural values. Only then can we achieve our goals of defending and extending our position as market leader for digital charging and making the world a cleaner, healthier and more livable place, where transportation hassles no longer exist!

On behalf of DIGITAL CHARGING SOLUTIONS group:



Jörg Reimann



Markus Bartenschlager



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# Scope of Application

This Code applies to all DIGITAL CHARGING SOLUTIONS Group employees and board members. To give employees as much guidance as possible in their daily activities, each company within the Group may develop and distribute subsidiary-specific internal policies based on this Code which define particular regulations and processes more precisely. Each company's internal policies are also binding on its employees. Acts that are in conflict with this Code must be immediately corrected. Employees who violate the provisions set out in this Code will be subject to disciplinary measures. Such measures may include termination of the employment agreement.

We also expect the parties we do business with to comply with the standards laid out in this Code. If we have reason to believe that one of our business partners fails to comply with the standards laid out in this Code, we may choose to terminate any future working relationship with the business partner.

# Acting with integrity

## Ethically Correct Behavior in Everyday Business

We expect everyone to treat each other with fairness, honesty and respect, irrespective of cultural, ethnic or religious background, gender, sexual orientation, professional position, age, disabilities, experience or any other criteria. This applies not only to employees, but also to our customers, shareholders, business partners and other third parties. We want to deliver the best possible services to our customers and always act in the best interest of the DIGITAL CHARGING SOLUTIONS Group at the same time. Leaders and the management of the DIGITAL CHARGING SOLUTIONS Group have a special role model function and need to make sure that their teams live up to this expectation. We cherish diversity and are convinced that it is a key asset for success. We do not tolerate any form of discrimination, harassment or bullying and take appropriate steps to prevent or remediate such cases.

Naturally, acting compliant with the law is essential and violations can lead to considerable fines, civil law claims, administrative or penal prosecution and reputational damage, both for the DIGITAL CHARGING SOLUTIONS Group as well as for the individual employee. We are strongly committed to providing a working environment and creating a culture that prevents compliance breaches. However, we naturally expect all our employees to take ownership for their actions, to assume accountability and to feel personally responsible to respect the law and our policies.

## Prevention of Corruption

We do not do business at any cost. We only want to win contracts in a fair and legal manner and we do not accept any form of corrupt practices including but not limited to extortion, fraud, embezzlement or bribery. Facilitation payments are also strictly prohibited. Apart from compliance with applicable law, all of our employees and board members must also comply with our internal policies to avoid even the appearance of corrupt practices, for example when it comes to the acceptance of gifts and invitations. We pay special attention to our contact with public authorities and their officials and under no conditions will they be granted monetary or other favors by us in order to gain an advantage. Likewise, we do not try to illegally influence business deals in the private sector. All employees are responsible to report (any suspicion of) corrupt behavior immediately.

We expect our business partners to respect our internal rules regarding how we deal with gifts and invites. Also, since there is zero tolerance for corruption at the Group, we expect our business partners to apply the same approach. Any attempt to unlawfully influence the Group's employees or corrupt actions of business partners that may affect the DIGITAL CHARGING SOLUTIONS Group indirectly will lead to appropriate consequences, such as the termination of a cooperation.

## Protecting Data and Business Secrets

Each employee is responsible to ensure that our high standards of data protection are respected without exception and to comply with our internal regulation regarding the use of personal data and confidential information in order to ensure information security. We observe applicable data protection laws, regulations and standards (such as the GDPR, PCI DSS, and ISO 27001) and work with internal or external Data Protection Officers for counsel.

Also, business secrets and other inside information vital for our success (for example intellectual property like strategies and tech code as well as information regarding the financial situation) must not be revealed or forwarded to unauthorized persons. Official statements on behalf of the DIGITAL CHARGING SOLUTIONS Group may only be made by designated Communication managers or after approval of an authorized representative of the DIGITAL CHARGING SOLUTIONS Group. This duty applies beyond the termination of the employment relationship with the Group as detailed more fully in each Group company's internal policies. We naturally respect the intellectual property of third parties.

## Conflicts of Interest

We respect personal interests and the private life of their employees. At the same time, every employee must act in the best interest of the DIGITAL CHARGING SOLUTIONS Group and avoid situations where personal and the DIGITAL CHARGING SOLUTIONS Group's interest may collide. Whenever such a situation arises, the involved parties must make it transparent and an appropriate solution to remediate the conflict shall be found. The Compliance Officer can always be consulted in cases of doubt.

## Fair Competition

We do not engage in agreements with any third party that would violate the principle of free and fair competition and we expect from all parties we do business with to abstain from activities that would violate antitrust regulation which prohibits, among other things, practices such as price fixing, the allocation of markets and/ or customers and the exchange of sensitive information with competitors. The Compliance Officer or the respective Legal Team must be contacted if an employee has any doubt as to whether an action could violate antitrust laws or customer protection regulation.

## Counteracting Terrorism and Preventing Money Laundering

Doing business with people and companies that are registered on certain sanction lists is prohibited. We abstain from engaging with such parties and complies with the restrictions as defined by relevant authorities or based on group-internal decisions. Legal Anti Money Laundering provisions are equally observed.

## Taxes and Finance

We comply with applicable tax duties in every country in which we operate. Our financial and accounting processes are appropriate, and we continuously review and improve them where necessary to ensure compliance with all given obligations. We apply the 4-eyes-principle in all relevant approval and decision-making processes.

# Assuming social responsibilities

## Our Environment

A healthy and clean environment is of utmost importance to us. In fact, our purpose is to make charging easy and transportation seamless, which directly contributes to the protection of the environment. We expect our business partners to also acknowledge the importance of environmental protection and contribute to it as best as they possibly can.

## Working Conditions

We strive to provide the best possible working conditions for our employees, which we also encourage our business partners to do. We comply with all applicable laws and regulations and relevant industry minimum standards. We know that our employees are our greatest asset and we want to enable them and provide an inspirational environment for personal and professional growth.

We also want our employees to speak up and raise any concerns they might have. Only through active participation, can we fully benefit from the individual potential and creativeness of each employee. We value feedback and welcome new ideas and suggestions for improvement. Our team leaders are responsible to encourage this spirit in their teams and to safeguard respectful and professional treatment at all times. Q&A sessions with the management as well as surveys and feedback talks shall be offered on a regular basis at the group. Any complaints and concerns can be directly raised with the HR department.

## Charitable Contributions and Sponsoring

If we decide to donate something or to sponsor a third party, the appropriateness of such activity will be ensured. No contributions to political parties or politicians are made on behalf of the group and we only make contributions on a voluntary basis.



# Speaking up

## Reporting Compliance Breaches

It is everyone's responsibility to ensure compliance with the law and the group's internal regulation. We will not tolerate breaches of the law, internal policies or this Code and everyone who does so will be held accountable. Yet in order to fully enforce our standards, we also need to provide safe whistleblowing channels for all members of the group as well as for third parties who may be concerned. There are several channels to report actual or potential compliance violations (a breach of the law or our internal regulation) to the Compliance Officer.

The email address **[compliance@digitalchargingsolutions.com](mailto:compliance@digitalchargingsolutions.com)** may always be used to contact the Compliance Officer for questions or to submit a report. People who report in good faith shall not be afraid of negative consequences and information submitted to the Compliance Officer will be handled confidentially. Alternatively, reports, also anonymously, can be made using our external [whistleblowing tool](#).

All submitted reports will be appropriately followed up on and all cases are adequately documented to ensure consistency in consequences. In especially severe cases, investigations may be supported by external consultants. Also, we are committed to consequence management across the hierarchy and irrespective of grades or positions.

## Decision Guidance

Sometimes we may not be sure whether or not a decision we are about to make is in line with the provisions of this Code. In that case, we should ask ourselves the following questions:

Am I sure that my decision does not violate existing laws? Could I justify my decision publicly, in front of my colleagues and my family and friends if I had to? Would I approve of the decision if someone else took it? Could my decision negatively affect the reputation of the DIGITAL CHARGING SOLUTIONS Group or its shareholders?

In case of doubt, we expect all members of the group to ask for authoritative guidance from their superiors or the Compliance Officer before acting.

# Code of Ethics

Should you have any queries or comments regarding this Code or wish to report a compliance breach, to discuss a sensitive ethical situation or if you have any other compliance-related question, do not hesitate to contact the Compliance Officer of the Group ([compliance@digitalchargingsolutions.com](mailto:compliance@digitalchargingsolutions.com)).

This Code as well as all internal policies are revised on a regular basis. This version is valid as of December 2019.

