

# CODE OF CONDUCT

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## REVISION HISTORY

VERSION	DATE	REVISION AUTHOR	SUMMARY OF CHANGES
1.0	19.9. 2024	Lucie Vosečková	Initial version



## **ELEVION GROUP CODE OF CONDUCT**

### **CEO'S OPENING STATEMENT**

*Elevion Group B.V. recognizes its role and its responsibilities towards employees and business partners. Strong interpersonal and business relationships are essential for building trust within any company.*

*Our commitment to ethical behavior is crucial to how we conduct business. Every action we take must align with our core values and beliefs, adhere to legal standards, and reflect our sense of integrity.*

*While our values remain constant, the business environment evolves. To achieve long-term success, we must clearly state our values and the actions we consider appropriate, and consistently act upon them.*

*I expect everyone to adhere to the Code of Conduct in their daily work and to uphold the reputation of Elevion Group B.V. by following these guidelines. I urge each of us to commit personally to not only follow these principles but also to grasp their core meaning. This will help us remain a strong group.*



**Jaroslav Macek**

Chief Executive Officer, Elevion Group B.V.



## **FOREWORD BY THE HEAD OF GOVERNANCE, RISK & COMPLIANCE**

*Honesty is a core value that lies within each of us, and we demonstrate it through our actions. Together, we can foster a positive atmosphere in our workplace and business practices. Violations of laws, internal policies, or ethical standards should never be tolerated.*

*While I believe in the inherent goodness of all individuals, I also understand from experience that resisting temptation can be difficult. Trust is something that takes time and effort to build but can be lost in an instant.*

*Each of us has a responsibility to prevent and, to the best of our ability, avoid situations that could harm the reputation of Elevion Group B.V. If you witness behavior or a situation that seems to violate ethical or legal standards, do not hesitate to speak up. Early intervention often allows for finding a suitable solution and avoiding serious consequences.*

*Let's work together to uphold the values that define us and ensure the ongoing success and integrity of our organization.*



**Lucie Vosečková**

Head of Governance, Risk & Compliance,  
Elevion Group B.V.



## **ON THE CODE OF CONDUCT**

The Elevion Group Code of Conduct (hereinafter as “Code of Conduct” or “CC”) was approved by the Board of Directors as a document to be followed by all employees and members of bodies (for the purposes of this document, they are also referred to individually as an “employee” or collectively as “employees”) of Elevion Group B.V. (hereinafter as the “Company”). The principles outlined in this CC reflect the core values of the Company. They establish the fundamental framework and define the standards of behavior expected within the company, as well as in our interactions with external partners.

The importance of these rules is underscored by the fact that employees are obliged to familiarize themselves with the Code of Conduct when they are recruited. Subsequent training usually takes place every year.

The CC is based on the legal order of the European Union and fully respects relevant international treaties, international agreements on human rights, the fight against corruption, and environmental protection.

At the same time, it is based on the fundamental corporate principles of the Company, which are:

- safety,
- performance,
- innovation,
- expertise,
- cooperation.



Violation of the laws and rules contained in this Code of Conduct can have serious consequences for each of us and the Company.

These consequences may be:

**for each of us:**

- possible termination of the employment relationship;
- financial impacts, e.g., in the form of an administrative penalty or compensation for damage;
- in serious cases, even criminal prosecution;

**for the Company:**

- damage to Company's reputation;
- high fines and an obligation to pay compensation;
- loss of profit;
- exclusion from procurement procedures.



Adequate legal consequences will be applied in accordance with the relevant legislation against those who demonstrably violate legislation, internal regulations, or this Code of Conduct.



## **BASIC RULES OF ETHICAL CONDUCT IN THE COMPANY**

### We act in accordance with laws, regulations, and rules

In all areas of our business activities, we comply with the applicable legislation of all countries in which the Company operates. We follow internal management documentation, which is based on national legislation and applicable European Union standards. We respect the conventions of the International Labor Organization and the United Nations.

We also respect the ethical rules and internal regulations of others (if they are publicly available, and if they do not conflict with legal regulations and our internal rules), and we expect the same behavior from our business partners.

### We stand for sustainable business

The Company follows the relevant standards, which include responsible behavior towards employees, business partners, society, and the environment, including the responsible management of a sustainable value chain. As part of our business activities, we adhere to the principles of sustainable development. We strive to constantly improve the quality of our products and services.

### In the workplace, we especially apply the following basic principles of conduct:

- We create a positive working environment for our employees where they can develop their potential and grow professionally. We do not accept any form of discrimination, repeated actions intended to harm, threaten, or intimidate others, harassment, or any other inappropriate behavior. For details, see [Fair employment practices](#).





- Safety and protection of health, persons, property, and information are an integral part of management in the Company. We respect them. For details, see [Safety and protection of health, persons, property, and information](#).
- In everything we do, we make sure not to cross the sensitive line of privacy and data protection of our employees and business partners. When working with personal data, we proceed fairly and in a legal and transparent manner. For details, see [Personal data protection](#).
- The intellectual property of the Company is one of the most valuable assets that we must all protect. For details, see [Protection of intellectual property](#).
- We avert and prevent possible conflicts of interest arising from private activities and the job position held. For details, see [Conflict of interest](#).

As regards the **business partners of the Company**, our goal is to achieve long-term and transparent relationships with all customers and suppliers, based on mutual respect and honesty. We fulfill this goal by adhering to the following principles:

- We always deal with all our customers transparently and honestly. We deal with our suppliers ethically, with respect and honesty. We require compliance with our ethical standards and rules throughout our supply chain. For details, see [Customer and supplier relations](#).
- We do not support or tolerate corruption or fraud in any form. We do not accept or provide any undue benefits. For details, see Corruption, inadmissible payments, and gifts.



- We only do business with business partners whose funds come from legitimate sources. We fully comply with the rules governing international sanctions. For details, see [Prevention of money laundering and compliance with international sanctions](#).
- When conducting business, we comply with competition law with the belief that only fair competition enables the free development of markets and the achievement of related social benefits. For details, see [Compliance with the rules of economic competition](#).
- We do not tolerate violations of the rules of public procurement and subsidy procedures. For details, see [Compliance with the rules of public procurement and subsidy procedures](#).
- We follow the rules that govern international trade. For details, see [International trade control](#).

**With respect to society**, our goal is to create and protect the name of the Company as a socially responsible partner contributing to sustainable development. In this spirit, we apply the following principles:

- We advocate the responsible use of natural resources and support the use of environmentally friendly technologies to achieve sustainability goals. For details, see [Environmental protection and sustainable development](#).



- We selflessly support charitable, scientific, research, educational, cultural, and other projects. Never, however, in case of a conflict of interest or political activities. For details, see [Charitable donations, sponsorship, support for research and development](#).
- We are apolitical and party-neutral; we do not support any action or initiative with an exclusively or primarily political goal. Any civic or political involvement by any of us must not damage the good reputation of the Company. We approach public authorities with respect. For details, see [Cooperation with public authorities and other institutions](#)
- Information provided to the public must always be objective and truthful. For details, see [Media and social networks](#).

The Company's reputation is largely influenced by what we do and how each of complying with the rules stipulated in this Code of Conduct, we the good name of the Company.

## **FAIR EMPLOYMENT PRACTICES**

**We create a positive working environment for our employees where they can develop their potential and grow professionally. We do not accept any form of discrimination, repeated actions intended to harm, threaten, or intimidate others, harassment, or any other inappropriate behavior.**



## WHAT YOU NEED TO KNOW

A fair and equal approach to all employees is a basic value recognized by the Company. We strive for strong, long-term relationships with employees based on mutual respect and trust.

We support a diverse and inclusive work environment. We support employees returning from maternity and parental leave. In this way, we create an environment that supports individuality of each person in the interest of the Company.

We offer employees adequate opportunities for professional and personal development, and we encourage them to use this offer to increase their abilities and skills. We support employees who contribute to the continued success of the Company with their expertise and skills.

We do not tolerate any form of disadvantaging employees who, in good faith, report possible violations of legislation, internal regulations, or rules set forth in this Code of Conduct or who submit a suggestion to improve the activities and procedures of the Company.



In our work, we strive to:

- implement a culture of mutual respect;
- respect human dignity;
- observe social norms and good manners;
- comply with labor law regulations, personal data protection rules, regulation of collective bargaining, and freedom of association and privacy protection, without hindering their application in any way;
- apply equal treatment, including the principle of equal and transparent remuneration within the meaning of relevant legislation;
- comply with the prohibition of any discrimination against employees (direct or indirect), repeated conduct intended to harm, threaten, or intimidate others, and harassment in any form;
- disallow any form of child employment and forced labor.

### **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Make decisions on employees solely on the basis of their qualifications (level of education, previous experience) and criteria related to the work performed (skills, performance, ability to work in a team, etc.).

Always treat employees and colleagues regardless of their race, ethnicity, nationality, sex, gender identity, sexual orientation, age, medical condition, religion, belief, or worldview or other discriminatory criteria.



Avoid any form of discrimination in the recruitment, evaluation, and remuneration of employees, as well as in the termination of the employment relationship. Comply with the rules governing working hours, rest periods, rights to working leave, and the protection of pregnant women.

Avoid refusing to cooperate with specific individuals because of their race, religion, gender, or other discriminatory considerations.

Do not tolerate harassment, intimidation, or a hostile environment (for example, mocking, gossiping, or telling jokes that ridicule or insult specific individuals, ethnic groups, or other minorities) or other discriminatory behavior in the work team.

Do not make sexual advances or create a hostile work environment for anyone you interact with during your work.

Do not tolerate violations of labor legislation, such as employing people who do not meet the conditions and requirements for their employment set by the relevant legislation.

## **SAFETY AND PROTECTION OF HEALTH, PERSONS, PROPERTY, AND INFORMATION**

**Safety and protection of health, persons, property, and information are an integral part of management in the Company. We respect them.**



## WHAT YOU NEED TO KNOW

The key elements of safety and protection of health, persons, property, and information of the Company are:

- protection of life and health, which we prioritize over other interests, in all activities;
- protection of property against theft, damage, misuse, or loss;
- protection of elements of the country's critical infrastructure owned by the Company;
- provision of confidentiality, availability and integrity of data and information, including those provided by employees, customers, business partners, and other third parties in accordance with all legislation governing the handling of categorized information, in particular classified information, personal data, insider information, trade secrets, and other confidential information.

To meet these priorities, we proceed in such a way that all activities are in accordance with the requirements of the regulators held by the Company.



## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Establish procedures to ensure the safety and health of employees, equipment, information, IT, and the operation of the business.

Comply with all legislation relating to operating safety, occupational health and safety (OHS). Make sure that you proceed in accordance with the requirements of the relevant regulators and the current internal management documentation of the Company, which complies with these standards and related legislation.

Ensure adequate operation and protection plans for critical infrastructure elements. Participate in training for crisis and emergency situations that may occur in the Company.

Create and maintain a work environment with an emphasis on its safety and with an effort to minimize the risk of injury, occupational accidents, or occupational diseases.

Ensure the safe operation of all technological equipment of the Company and meet all conditions for the safe operation of this equipment.

Observe the prohibition of work under the influence of alcohol and other addictive substances (e.g., drugs) and the prohibition of use of these substances at work during and outside of working hours.

Record correctly and truthfully the presence of employees at the workplace.

Follow the rules of the Company's workplaces for entering and leaving buildings, and wear the relevant identification card in a visible place.





Prevent unauthorized persons from accessing the Company's premises and facilities.

Protect the assets of the Company and the assets of third parties used to perform activities for the Company against theft, misuse, damage, destruction, or loss.

Do not use the assets of the Company for purposes other than work, unless you have an agreed exemption in this regard. Always manage entrusted resources (especially working tools, aids, clothing, motor vehicles) properly and in accordance with the legitimate interests of the Company.

Ensure adequate protection of hazardous materials.

Do not leave equipment or workplaces in the Company's facilities unsecured to which only authorized staff have access. Report any such unsecured equipment or workplace.

Pay attention to the security of information technology and electronic data processing. Do not leave unsecured IT equipment unattended, such as laptops, servers, etc.

Do not participate in the distribution of spam and other inappropriate or dangerous content or data of unknown origin. Report unsolicited mail and electronic messages with inappropriate or dangerous content to the appropriate departments or persons in accordance with the established procedures.



Assess the requirements for safety and OHS associated with new investments, acquisitions, business plans, products, processes, or services before starting a new activity. Consider also the risk of damage to the reputation of the Company.

Verify the necessary information with new employees and business partners to the extent permitted by legislation and internal management documentation of the Company.

Report any deficiencies in protection measures to your manager or the GRC department.

Investigate safety concerns of employees, customers and suppliers.

Protect confidential business information of the Company through contractual confidentiality arrangements or in accordance with the relevant legislation, and protect any information of suppliers and customers in accordance with the terms of the contractual relationship and applicable legislation.

Strictly comply with the requirements and procedures established by the internal management documentation of the Company and legislation governing the protection of trade secrets, including information provided by business partners, suppliers, and other third parties designated as insider information or trade secrets.

Consult your manager or an employee of the legal department, before:

- you request, receive, or use confidential information on external entities;
- you disclose confidential information on the Company to someone;
- you allow external entities to use the intellectual property of the Company.



## **PERSONAL DATA PROTECTION**

**In everything we do, we make sure not to cross the sensitive line of privacy and data protection of our employees and business partners. When working with personal data, we proceed fairly and in a legal and transparent manner.**

### **WHAT YOU NEED TO KNOW**

The Company guarantees the responsible handling of personal data, i.e., data that can be used, among other things, to identify a specific individual (e.g., name, birth number, address, photograph, etc.). We proceed in accordance with the relevant personal data protection legislation in countries in which the Company operates and with other privacy protection legislation.

The rules that govern the handling of personal data, which everyone should familiarize themselves with and which must be followed, include:

- relevant personal data protection legislation of the countries in which the Company operates;
- internal management documentation governing personal data protection in the Company, implementing personal data protection legislation in the environment of the Company;
- any related contractual obligations.



## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Respect the privacy protection rights of employees, especially when dealing with personal data. This is without prejudice to the right of the Company to monitor the use of its assets (including IT and communication technology, corporate information, etc.) in accordance with the relevant legislation.

Process the personal data of employees, representatives of business partners, or other individuals whose personal data is processed only for legitimate purposes resulting from the relevant legislation or from employment and contractual relationships and in accordance with the relevant legislation.

Before the legitimate provision of personal data or confidential information to suppliers, ensure that they have taken appropriate technical, physical, and organizational measures to prevent unauthorized access to or misuse of such personal data.

Prevent unauthorized access to personal data and ensure it is not accidentally lost, damaged, or destroyed.

Use caution when distributing personal data by email (e.g., do not send it to more people than necessary). Do not forget documents containing personal data in the printer or copier (they may be accessible to others).

Use anonymized data (with removed names and identification data) or aggregated data (summary for several persons in which a specific person cannot be identified, even indirectly) where appropriate or mandatory.



Avoid sharing personal data with third parties, such as suppliers, who do not have appropriate security procedures and restrictions in place to ensure personal data protection.

Avoid transferring personal data to third countries or international organizations without assessing the relevant legal requirements and without prior consultation with your manager or legal department.

If you discover that personal data have been used in violation of the Company's internal management documentation, or if the security of any system or equipment containing personal data has been breached, immediately inform your manager or GRC department.

## **INTELLECTUAL PROPERTY PROTECTION**

**The intellectual property of the Company is one of the most valuable assets that we must all protect.**

### **WHAT YOU NEED TO KNOW**

The intellectual property of the Company may include in particular:

- inventions (patents), industrial designs, utility models, and improvement suggestions;
- trademarks;
- other objects of intellectual property;



- trade secrets and other confidential information.

At the same time, it is absolutely necessary to respect the valid intellectual property rights of others. Unauthorized use of third-party intellectual property can expose both the company and every employee of the Company to the risk of:

- material financial impacts (administrative penalty, compensation for damage, release of unjustified enrichment, etc.);
- criminal prosecution.

The key to protecting the intellectual property of the Company and at the same time to ensuring protection against the risks described above is the timely and appropriate assessment of new products, services, processes, and software, especially from the point of view of possible protection of industrial property (e.g., inventions), from the point of view of other protection (trade secrets), or from the point of view of the risk of potential copyright infringement.

If you create an employee (author's) work while performing your working duties, you are its author, but your employer exercises the property rights to the work. In terms of content, the right to exercise author's property rights by the employer means that only the employer itself may use the employee work and grant licenses to use the employee work to third parties, collect remuneration for providing a license to use the employee work or remuneration for the use of the employee work, etc. In principle, the author himself/herself cannot use the work or grant licenses to use the author's work to third parties on their own behalf.



## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Identify and protect the intellectual property of the Company.

Do not distribute proposals for new products, services, or trademarks, etc. outside the Company.

Respect the patents, utility models, and copyrighted materials and other protected intellectual property of others and, where appropriate, ensure that they are used only in accordance with applicable laws and contractual obligations.

Consult an employee of the legal department or an external legal advisor on matters regarding licenses or consent to use the protected intellectual property of others, such as patents, trademarks, etc.

Consult an employee of the Legal Office Department in the case of intellectual property of the Company (e.g., patents, trademarks etc.) is being used by a third party.

Do not allow the use by another company to develop new products, services, or software without a written agreement on ownership, use, and other intellectual property rights.

Before launching a new product or service or its name, make sure that it does not infringe on the patents, utility models, trademarks, or other intellectual property rights of others.



Do not allow the demonstration of new products or services or the provision of information on them before the filing of a patent, trademark, utility model, or industrial design application (or the decision not to file such an application).

Before terminating an employee's employment with the company, especially if you know that he/she will work for a competitor, make sure that there are measures in place to prevent (even unintentional) misuse of the intellectual property of the Company.

Do not support or tolerate situations in which an employee, especially one who previously worked for a competitor, misuses (perhaps even unintentionally) a competitor's intellectual property for the benefit of the Company.

Negotiate with business partners and suppliers and comply with contractual obligations to protect intellectual property in relevant business cases.

Respect and support the right of employees of the Company to create values representing intellectual property.

If you believe that you have created a corporate invention, utility model, or other potential industrial property, inform your manager or an employee of the legal department who will make further arrangements with you.





## **CONFLICT OF INTEREST**

**We avert and prevent possible conflict of interest arising from private activities and the job position held.**

### **WHAT YOU NEED TO KNOW**

The Company fully respects the right of employees to have their own business and private life in addition to their job. At the same time, it expects employees to be loyal to their employer and not be influenced by personal interests and relationships in the performance of their working duties.

Therefore, avoid conduct in which:

- your personal interests could come into conflict with the interests of the Company – even if you do not act with malicious intent, the slightest hint of a conflict of interest can have a negative impact;
- you would directly use your position in the Company for your personal benefit.

### **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Consider carefully what your actions may look like to others. Avoid all actual, potential, and perceived conflicts of interest.

Obtain your employer's written consent before accepting a position as a member of the statutory or supervisory body of a business corporation that has the same business as your employer, or before you yourself start another gainful activity that is identical with your employer's business.



Obtain your employer's prior written consent even if you plan to participate in a capital trading company that has the same business as your employer, beyond the normal exercise of the rights of a member or shareholder. Participation beyond the normal exercise of the rights of a member or shareholder means, for example, to actively secure contracts or to take care of matters for the given capital company.

The subject of the employer's activity for the purposes of prior written consent may be defined in the relevant internal management documentation (working rules).

Avoid any gainful activity that you would perform during working hours or with the use of equipment or materials of the Company unrelated to the activity performed in your employment relationship.

Do not abuse your position or standing with your employer for your own benefit or for the benefit of another person. In particular, do not use resources, working time (yours or your colleagues'), information or property of the Company (e.g., office equipment, IT equipment and computer programs) to which you have gained access based on your position in the Company for personal gain.

Avoid dealings or relationships that may result in a conflict of interest with your job or with the interests of the Company, or even the slightest hint of it. In particular, avoid financial or other interests in a company in which you can personally influence its business cooperation with the Company (for example, if the company is a customer, partner or supplier of the Company).

Inform your manager of all working and other activities, financial and other interests, and relationships that may result in or suggest a conflict of interest.



## **CUSTOMER AND SUPPLIER RELATIONS**

**We always deal with all our customers transparently and honestly. We deal with our suppliers ethically, with respect and honesty. We require compliance with our ethical standards and rules throughout our supply chain.**

### **WHAT YOU NEED TO KNOW**

The Company's relations with customers and suppliers are based on legal, efficient, fair, and honest conduct. With respect to all business partners, the Company ensures compliance with the rules stipulated in this Code of Conduct.

#### Customer relations

We provide our services in a qualified, professional manner. We are looking for solutions that best meet our customers' needs and consumer protection requirements.

In accordance with the best available knowledge, we provide our customers with clear, unbiased, complete, and up-to-date information that is not misleading. We are also committed to providing accurate information regarding the electricity market.



## Supplier relations

We deal with suppliers on the basis of mutual respect and honesty. We strive to establish business relationships with partners who have a good reputation, act in accordance with the principles of sustainable business, respect our corporate values, comply with legislation, including regulations in the field of environment, social, and governance (ESG), conventions of the International Labor Organization and the United Nations, as well as the general rules established by this Code of Conduct and who require compliance with these principles and rules from their suppliers and partners.

In the field of ESG, we improve the systematic monitoring of risks, impacts, and opportunities, including their reporting, also towards our suppliers.

We emphasize due diligence with respect to our value chain, especially our supply chain. Integrating our sustainability goals across the value chain is key for us, and we adjust our contractual relationships accordingly.

For this purpose, we define rules of ethics for the suppliers of the Company through the Commitment to Ethical Conduct, which contains rules and related requirements for compliance with ethical and legal standards by suppliers, governs the possibility of monitoring compliance with these rules by the Company, and establishes sanctions in case of violations of accepted obligations on the part of the supplier. The commitment to ethical behavior forms part of the contracts concluded, and when entering into a contractual relationship with the Company, suppliers undertake to comply with this Commitment to Ethical Conduct as they sign the contract.



## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Comply with the requirements of the relevant legislation governing relations with customers and suppliers, and make sure that you follow the current internal management documentation that complies with this legislation. Strive to ensure fair treatment of all business partners of the Company.

### Customer relations

When offering services to customers, provide only true information and communicate all terms of the contractual relationship in an understandable way.

When promoting services and advertising activities, provide true information, without elements of inappropriate

or deceptive advertising, do not hide important facts, and do not offer benefits that you cannot guarantee.

Adhere to the principles of seriousness in advertising (this also applies to comparing your own services with those of competitors).

### Supplier relations

Do not allow the selection of a supplier by any means other than a fair and transparent tendering process, unless otherwise required by law or internal management documentation.



Pay maximum attention to the selection of the supplier. If possible, consider when selecting whether the supplier adheres to the principles of sustainable business within its value chain, applies policies and procedures compliant with ESG, and follows best practices, including disclosure requirements under applicable laws. In particular, such a supplier:

- does not allow dangerous or inhuman working conditions, conditions going against the protection of human rights, including forced labor, prohibited penalties, discrimination and unequal treatment, employment of children or persons younger than the minimum legal age;
- does not tolerate violations of labor law rules or acceptable living conditions, including minimum wages, maximum working hours, mandatory breaks at work, freedom of association, social dialog and collective bargaining, prohibition of employment of persons without a work permit;
- complies with valid standards and norms in the field of sustainability and environmental protection, taking into account the principles of the environmental management system;
- regularly checks and prevents, and possibly removes and corrects, imminent or identified compliance deficiencies, and provides the necessary cooperation to the Company to meet its due diligence obligations within the value chain, especially the supply chain, including the fulfillment of the established ESG goals, related risk management, and reporting.



Cooperate only with suppliers who comply with national and other legislation and the requirements of the Company in the areas of health and safety, human rights, the environment, and employment.

When selecting suppliers and intermediaries, comply with the requirements and procedures established by the Company's internal management documentation for checking third parties and concluding brokerage contracts. When entering into a contractual relationship with suppliers of the Company, make sure that the suppliers undertake in writing to comply with the Commitment to Ethical Conduct.

## **CORRUPTION, INADMISSIBLE PAYMENTS, AND GIFTS**

**We do not support or tolerate corruption or fraud in any form. We do not accept or provide any undue benefits.**

### **WHAT YOU NEED TO KNOW**

By inadmissible payment we mean a bribe (an undue benefit consisting of direct property enrichment or other advantage that is received or should be received by the bribed person or with their consent by another person and to which there is no claim), a commission without a legal basis, a payment without a legal reason, or a payment for unrealized performance (fictitious invoices), but also a payment to facilitate or speed up the processing of a legitimate request by the Company, if not governed by relevant legislation (facilitating payment).

An inadmissible payment can also be understood as a bribe in the form of goods or services provided.



If you act with the aim of obtaining undue benefits for yourself or the Elevion Group B.V., the payment is not acceptable under any circumstances; by making it, you expose yourself and the Company to the risk of criminal prosecution or administrative sanctions.

Inadmissible payments are expressly prohibited:

- in all countries of the world;
- in all business dealings, both in the private and public sectors;
- during the performance of work or duties resulting from a position which may result in an undue advantage of one of the parties involved or unjustified damage to one of the parties involved.

Do not confuse inadmissible payments with reasonable and limited spending on gifts, business meetings, and social contacts related to our products or services or the execution of contracts. These expenses are acceptable if they correspond to normal business practices and cannot influence business decisions or decisions of public institutions.

You can also find details of which payments are inadmissible and which gifts are inappropriate or unacceptable in the internal management documentation of the Company (Company's Gift's Policy).





## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Do not offer, promise, solicit, give, or accept anything that constitutes an inadmissible payment or gift.

Before giving or accepting any gift, make sure that you are familiar with the Company's internal management documentation, the requirements of the relevant legislation, and the corresponding internal rules of the counterparty (if publicly available), and that you do not violate any of these rules when accepting or giving such a gift. Never offer a favor in a business relationship, such as a gift, a contribution, or entertainment, if it could seem inappropriate under the circumstances.

Make sure you understand the difference between a bribe and a small favor as a possible way of saying thank you.

Where required by the internal management documentation of the Company, the provision and receipt of gifts is subject to the obligation of registration and approval. Make sure that the entry in the register or proof of expense on the gift (e.g., receipt, gift agreement, etc.) accurately reflects the true nature of the gift provided.



Carefully verify the compliance of the conduct of potential and current business partners with legislation, and do not initiate cooperation with such partners, or terminate this cooperation if information on them indicates:

- the use of illegal or unfair business practices;
- the reputation of a person providing, offering, requesting, or accepting bribes;
- family and other ties that may inappropriately influence the decision of a customer or official.

Strictly refuse:

- a request for a bribe or an offer of a bribe (or kickback) in connection with a selection (tendering) procedure;
- a proposal to broker a contract through a specific representative or partner if it is in conflict with the requirements of the Company's internal management documentation for arranging brokerage contracts;
- gifts from business partners or competitors, if you make decisions concerning them on behalf of the Company, with the exception of the above-mentioned cases of minor considerations that cannot influence business decisions;



- a request to make a payment to a country or to a name unrelated to the transaction;
- payments or commissions, the amount of which does not correspond to the services provided.

If you become aware of conduct that violates the requirements of the Company, or if you suspect that an inadmissible payment, unacceptable offer, request, provision, or acceptance of a gift, hospitality, or another consideration has occurred, report it without delay:

- to your immediate manager;
- to an employee of the Governance, Risk & Compliance Department; or
- in other ways listed in this document (e.g., through the Whistleblowing System – see the Speak Up section).

## **PREVENTION OF MONEY LAUNDERING AND COMPLIANCE WITH INTERNATIONAL SANCTIONS**

**We only do business with business partners whose funds come from legitimate sources. We fully comply with the rules on international sanctions.**



## **WHAT YOU NEED TO KNOW**

Persons involved in criminal activities, such as terrorism, drug trafficking, corruption, and fraud may attempt to “launder” the proceeds of their criminal activities in order to hide their gains or give them the appearance of legitimacy. In money laundering, the origin of these funds is hidden so it is subsequently impossible to determine their source or even their owner.

The “know your customer” principle is applied in the Company. This means that relevant risks are identified, and appropriate steps are taken to prevent and detect unacceptable or suspicious payments.

## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Consistently comply with the relevant legislation governing the area of money laundering prevention in the countries in which the Company operates. Conduct identification and review of business partners, and verify the existence of a politically exposed person (PEP) in a transaction in accordance with applicable regulations.

Gather documentation on potential business partners, familiarize yourself with them, and ensure that these partners are engaged in legitimate business and that their funds come from legitimate sources.

Comply with regulations on the register of beneficial owners, and verify the entry of mandatory data in that register by business partners.



Do not enter into transactions involving embargoed countries, their citizens, or representatives or natural or legal persons subject to international sanctions imposed by the European Union, or other international organizations. Verify that the transaction complies with all relevant regulations and rules that restrict transactions with certain (sanctioned) countries and persons, and that it is not a transaction carried out in prohibited ways.

Do not enter into a business relationship with a business partner who is reluctant to provide complete information, who provides insufficient, false, or suspicious information, who tries to avoid required reports or records, or who is reluctant to provide information necessary to assess the credibility and legality of the business or transaction.

Comply with legislation governing restrictions on cash payments. Do not accept payments in cash or through monetary instruments that have no connection to the customer or that have been identified as money laundering mechanisms.

Do not accept orders, purchases, or payments that are unusual or do not correspond to the customer's business and activities.

Do not enter into business relationships with an unusually complex structure in which the end recipient of the transaction is unknown, or into business relationships with payment methods that do not make commercial sense or which allow unusually favorable payment terms.



Do not allow transfers of funds to or from countries that are not related to the transaction or are not logical for the customer in question.

Do not carry out transactions whose arrangement obscures the obligation to record or report them (for example, multiple transactions below the reportable limit).

If you come across a transaction carried out under circumstances that give rise to suspicions of an attempt to legalize the proceeds of criminal activity or the financing of terrorism, report it to your manager, the Governance, Risk & Compliance Department, or through the Whistleblowing System (see the Speak Up section), and proceed with the transaction only after it is authorized. Be sure to record the solution properly.

## **COMPLIANCE WITH THE RULES OF ECONOMIC COMPETITION**

**When conducting business, we comply with competition law with the belief that only fair competition enables the free development of markets and the achievement of related social benefits.**

### **WHAT YOU NEED TO KNOW**

Economic competition rules:

- prohibit arrangements in any form, including the exchange of information on competition parameters, between competitors (including those associated in associations, societies, etc.), or between suppliers and customers, which distort economic competition (cartel agreements);



- prohibit the abuse of a dominant or monopoly position of companies on the market;
- require notification and waiting for approval by the competition authorities regarding combinations (mergers, acquisitions, etc.) of companies or their parts with a turnover in the prescribed amount;
- require approval by the European Commission of any selective advantage to economic operators to the detriment of public budgets (state aid) or verification of compliance of state aid with EU regulations which allow an exemption from the obligation of said approval;
- require compliance with the legal rules of cooperation with the authorities for the protection of competition, including cases of unreported investigations in the company's business premises, but without the obligation to incriminate the company or themselves.

The stated principles and prohibitions apply both to the conduct of the Company and to the conduct of business partners and other competitors with respect to the Company. Distortion of competition may occur on both the supply and the demand side of the market, if the goods or services in demand are further used for economic activity.



## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Always strive for efficient, honest, and independent participation in economic competition. Comply with relevant legislation and the Company's internal management documentation for the protection of economic competition. Do not propose or enter into arrangements in any form, including the exchange of information on the parameters of a tendering procedure, with any competitor (including those associated in associations, societies, etc.) regarding any aspects of competition between the competitor and the Company. Do not discuss or negotiate with a competitor or its representatives, in particular:

- prices, costs, margins, discounts, or other terms of sale or purchase;
- areas of sale or purchase and market shares, classification of customers or suppliers, product or service offerings, or their distribution with competitors;
- participation, bids, prices, ranking, or other competition parameters in tendering procedures in accordance with the Public Procurement Act and outside of it or in auctions;
- information regarding production, capacity, sales volume, or their limitations.





Avoid any contacts with competitors that could give rise to a suspicion of participation of the Company in prohibited agreements or arrangements. Immediately abandon negotiations with competitors involving discussions of specific competition parameters, and inform your manager and the Legal Office Department. Obtain information on competitors exclusively from legal, especially publicly available, sources.

Do not propose or enter into arrangements in any form with clients or customers which would determine the minimum price, limit the sales territory, customer groups, or other conditions under which the client or customer may further provide the product to other entities.

Do not abuse the significant position of the Company on the supply or demand side of the market to obtain unfair advantages in the negotiation or performance of contracts and other negotiations with an impact on the market.

Evaluate the intentions of mergers, acquisitions, or joint ventures with companies outside the Company or its parts in terms of the obligation to notify these transactions to the competition authorities in the countries of jurisdiction of the parties to the combination or the European Commission (EC) and the obligation to wait for their approval. Similarly, evaluate the obligation to notify the EC of performance by non-EU countries for participants in the combination. Before starting negotiations on the transaction, inform the Legal Office Department to verify whether the combination and performance is subject to control or notification to the competition authorities and the EC.



Accept state aid after verifying its compliance with the exemptions from its general prohibition.

In the event of an unreported local investigation by the competition authorities on the Company's premises, cooperate with the officials conducting the investigation, bearing in mind that you must not be forced to incriminate yourself or the company for the conduct under investigation.

Consult the Legal Office Department of Elevion Group B.V., on whether your intended conduct may violate competition law and whether there is a legal exemption from the prohibition of such conduct. Proceed in accordance with the Company's management documentation concerning compliance with competition rules, including the relevant guidelines. Participate in training sessions focused on the risks of violating compliance with competition rules.

If you discover a violation of the competition law against the Company through any of the above actions, inform your manager and the Legal Office Department.

## **COMPLIANCE WITH THE RULES OF PUBLIC PROCUREMENT AND SUBSIDY PROCEDURES**

**We do not tolerate violations of the rules of public procurement and subsidy procedures.**



## WHAT YOU NEED TO KNOW

### Public contracts

The Company consistently complies with its obligations when awarding public contracts in accordance with relevant legislation. If any of the Company acts as a contracting authority, it observes in particular the principles of transparency and proportionality and, if appropriate under the circumstances, the principles of socially and environmentally responsible procurement and innovation. In relation to suppliers, it also observes the principle of equal treatment and prohibition of discrimination. The Company also requires its suppliers to comply with international sanctions affecting public procurement and respect imposed prohibitions on participation in public procurement.

As regards public contracts, it is forbidden to coordinate activities in procurement procedures with other suppliers. If a company were to commit such behavior, even simply an attempt, it would be a possible reason for exclusion from the relevant procurement procedure. Other possible negative consequences of this conduct include criminal sanctions against the company and its individual employees.

### Subsidy procedure

The Company, as applicant and recipient of subsidies, comply with all legislation and binding instructions related to participation in subsidy procedures. The Company comply with all regulations binding on it even when brokering subsidies for third parties.



Violation of the relevant regulations may result in the need for repayment up to the amount of the provided subsidy and the associated penalty also up to the amount of the provided subsidy and, in case of culpable conduct, a criminal penalty.

## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

### Public contracts

As employees of the Company, you are obliged to avoid any behavior that could be assessed as an attempt by the Company to provide, negotiate, or obtain an undue benefit when awarding a public contract in the framework of a tendering procedure or public auction, or to influence their course.

In connection with the preparation and implementation of a public contract, only accurate, complete, and undistorted information must be provided by the Company, both in the position of the contracting authority and in the role of a (potential) supplier.

As employees of the Company, you are obliged to maintain the specified obligation of confidentiality and to provide information on public contracts only to the extent and in the manner established by legislation, i.e., primarily by the Public Procurement Act.

Remember that the field of public procurement is also subject to obligations concerning conflict of interest and may also be regulated in detail by special regulations, e.g., the Public Procurement Act.



It is prohibited to attempt to illegally influence the selection of a supplier within the framework of the procurement procedure for a public contract, or to provide any supplier with an illegal head start over other (potential) participants in the procurement procedure or more favorable conditions at the expense of other suppliers.

Any arrangements consisting in the provision, offer, promise, request, or acceptance of a financial or other benefit in exchange for refraining from participating in the procurement procedure for a public contract or in a tendering procedure are also prohibited.

Obtain documentation on the procurement procedure in such a way that the Company is able to document the current stage of the procurement procedure, if necessary.

When dealing with contracting authorities or suppliers, observe the principles of prudence to make sure that the Company can't be attributed any violation of relevant legislation.

In case of any doubt regarding the correctness of the interpretation or application of legislation relating to public procurement, consult your manager and the Legal Office Department.

In case of reasonable suspicion of a procedure violating the above obligations, the employee is obliged to report such behavior through the Whistleblowing System (see the Speak Up section).



## Subsidy procedure

When applying for subsidies, the Company must provide only true, accurate, complete, and undistorted information. When submitting an application and further communicating with the subsidy provider, false, incorrect, or grossly distorted data must not be provided, and essential data must not be concealed. Incorrect or incomplete documents must not be drawn up, used, or submitted, and no documents must be concealed.

It is forbidden to try to illegally influence the course of the subsidy award procedure.

Obligations regarding conflict of interest also have an impact on the area of subsidy procedures. Check the relevant rules.

Funds obtained through a special-purpose subsidy must not be used for a purpose other than intended. When using the subsidy, the relevant subsidy conditions must be observed.

In case of any doubt regarding the correctness of the interpretation or application of legislation relating to subsidies, the employee is obliged to consult his manager.



## **INTERNATIONAL TRADE CONTROL**

**We follow the rules that govern international trade.**

### WHAT YOU NEED TO KNOW

In business relationships, the Company must follow the rules that govern international trade in the areas of import or export of:

- goods and services;
- hardware and software; or
- technology

across state borders, including its transmission by electronic means.

Likewise, it is obliged to comply with international conventions and related legislation that limits or prohibits the movement of funds and business relations between certain countries and legal or natural persons.

Violation of international trade rules can result in serious penalties, including fines and disruption of simplified import and export procedures (interruption of the smooth supply flow).



## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Comply with the rules of international organizations and the legislation of the countries in which the Company operates and with the related procedures applicable to the import and export of goods, technology, software, hardware, services, and to financial transactions.

Comply with the requirements and procedures established by the Company's internal management documentation and other relevant documentation governing foreign business transactions and business relations with foreign entities.

Make sure that the Company and its sales representatives provide accurate and complete information to government authorities.

Check the correctness of the export classification of products, software, or technology before exporting them, and make sure whether special authorization is required.

Do not support any prohibited business practices or boycotts that are punishable under applicable law.

Verify any facts or signs indicating that the business partner is trying to circumvent the rules of international trade (for example, the business partner's evasive, reluctant, or unsatisfactory answers to questions on the end use of the supply, end user, dates, and place of delivery).





Reject invoices for imported goods where the stated price does not reflect the value of the goods, the description of the goods is incomplete, or the country or origin of the goods is not given correctly.

Reject any payments to the importer that are not included in the invoiced price or otherwise recorded.

Be cautious about related party transfers where prices do not cover the relevant costs and profit.

Consult your manager or Legal Office department if you are unsure whether a transaction may be in conflict with the applicable legislation, including European Union legislation.

Notify your manager and the Governance, Risk & Compliance Department immediately if you believe that a business partner or another party involved in the business does not comply with the rules of international trade.

## **ENVIRONMENTAL PROTECTION AND SUSTAINABLE DEVELOPMENT**

**We advocate the responsible use of natural resources and support the use of environmentally friendly technologies to achieve sustainability goals.**



## WHAT YOU NEED TO KNOW

We are aware that responsible behavior towards society and the environment is one of the main factors of business success. We therefore strive to contribute to sustainable development in all areas in which we operate. We strive for a similar approach in relation to our partners within our sustainable value chain, especially the supply chain.

We emphasize the responsible and sustainable use of natural resources and the protection of our nature and biodiversity in the context of climate change.

We proceed in such a way that all our activities comply with legislative requirements relating to the care of the environment held by the Company. We respect international conventions on the environment. In accordance with the relevant requirements, we identify environmental risks, create conditions for their mitigation, and report on the state of the environment.

The Company complies with environmental protection and sustainability requirements in all its activities. Suppliers within our supply chain are obliged to follow the same approach to safety and environmental protection under the Commitment to Ethical Conduct.



The Company also places particular emphasis on meeting global climate goals, decarbonization, water and energy management, proper waste management, and reduction of the negative environmental impact of our business. Through our efforts and solutions, we want to enable ourselves and our customers to reduce emissions and increase energy efficiency, thus contributing to a sustainable and clean future.

### **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Comply with all environmental legislation.

Through your behavior, support environmental protection as an integral part of working practices and the management system.

Communicate our environmental protection policy not only with each other, but also with our partners.

Assess the requirements for the environment associated with new investments, acquisitions, business plans, products, processes, or services before starting a new activity. Consider also the risk of damage to the reputation of the Company.

Report any suspected risk or breach of environmental legislation.



## **CHARITABLE DONATIONS, SPONSORSHIP, SUPPORT FOR RESEARCH AND DEVELOPMENT**

**We selflessly support charitable, scientific, research, educational, cultural, and other projects. Never, however, in case of a conflict of interest or political activities.**

### **WHAT YOU NEED TO KNOW**

The Company's research and development programs cover many areas, including renewable energy sources and sustainable solutions. As part of our program support, we place particular emphasis on topics with significant application potential and on activities that reduce the negative environmental impacts of the Company's business.

We bring new and innovative solutions to energy needs that save the environment and contribute to a higher quality of life. We use the results of research and development in the Company to improve the ecological as well as the safety and economic parameters of our activities.

We financially and materially sponsor science, education, art, culture, and sport, as well as charitable, social, and humanitarian projects.

We support energy efficiency, promote new technologies, and focus on investments in modern technologies, science, and research. We also support the development and dissemination of environmentally friendly technologies.



## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Never use charitable donations and sponsorships to gain an undue advantage.

Do not provide any financial contributions to political parties, political movements, or political organizations, foundations, or associations on behalf of the Company.

Do not make any financial contributions to organizations or individuals in cases where there is a risk of a conflict of interest.

## **COOPERATION WITH PUBLIC AUTHORITIES AND OTHER INSTITUTIONS**

**We are apolitical and party-neutral; we do not support any action or initiative with an exclusively or primarily political goal. Any civic or political involvement by any of us must not damage the good reputation of the Company. We approach public authorities with mutual respect.**

## **WHAT YOU NEED TO KNOW**

In our work, we often come into contact with public authorities and other public institutions. In every situation, employees of the Company must comply with the following principles:

- adhere to ethical standards;
- know and consistently comply with the relevant legislation governing the scope, powers, and procedures of public authorities;
- ensure the accuracy, timeliness, and truthfulness of the information provided;
- avoid unacceptable influence or practices that may raise suspicions of corruption.



## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

Comply with the relevant legal regulations applicable to cooperation with public authorities and other institutions. Be truthful and accurate, cooperate with employees of public authorities and other institutions during negotiations, and avoid submitting inaccurate or incomplete data.

Provide the necessary cooperation to public authorities and other institutions in a fair and transparent manner, respecting the roles that both parties represent.

Verify whether the requested information is not subject to a state-imposed or recognized obligation of confidentiality, and whether it is classified information in accordance with the relevant law.

Avoid influencing an official, for example with a gift or a promise to negotiate an employment relationship with this person or members of their family, if the person could have the opportunity to influence the decision of a public authority.

Establish processes to ensure the timeliness, accuracy, and completeness of reports and other communications to appropriate entities. Pay attention to the form of communication – prefer timely written communication through official channels. Keep appropriate records of communications with public authorities.



## **MEDIA AND SOCIAL NETWORKS**

**Information provided to the public must always be objective and truthful.**

### **WHAT YOU NEED TO KNOW**

#### Media

The Company values its relations with the media and the public. The goal of the Company is to communicate openly and actively, with an awareness of responsibility for the timely, accurate, and objective provision of information.

The Company deals with confidential information in accordance with the relevant legislation and internal management documentation, which guarantee that the information will only reach authorized persons or that its dissemination will be intended exclusively for the purposes of the Company.

We provide up-to-date and complete messages with accurate content through authorized persons.

We use advertising, the content of which must always be true and in accordance with the basic ethical values of civil society and relevant legislation.

#### Social networks

Given that social networks are a rather common means of everyday communication and sharing events in our lives, they should be given due attention.

With their growing importance for business activities, social networks are emerging as an important communication tool within the Company and beyond.



We use social networks exclusively to support our business activities and business model.

## **YOUR ROLE, WHAT TO DO, AND WHAT TO PAY ATTENTION TO**

### Media

Information relating to the Company can only be provided to the public and the media by persons authorized to do so from among the statutory bodies or management of the Company or the Marketing and ESG Department. If you have been contacted by the media and you are not one of the authorized persons, please refer them to one of the authorized persons and do not disclose any information regarding the Company .

In relations with the media and the public, it is essential:

- not to provide information regarding the Company to the media (press, television, radio, etc.) without the prior consent of the authorized person (this is without prejudice to the rights and legitimate interests of labor unions, which are stipulated in the legislation governing their powers and scope, as well as the rights of other legal entities in accordance with the relevant legislation);
- to ensure the timeliness, accuracy, and objectivity of the information provided;
- to know and consistently comply with the relevant legislation and internal management documentation of the Company governing the protection of trade secrets and other confidential business information.





## Social networks

The establishment of corporate profiles on social networks is subject to consent of the authorized person. Personal profiles on social networks can be used by employees in relation to the Company exclusively to support its business activities and business model.

Report inappropriate comments, blogs, or information published on social networks on behalf of a the Company or by its employee which are untrue or whose content damages the good name of the Company or makes such an impression, to the Marketing and ESG Department.

As regards communication via social networks, it is necessary to comply with the following principles:

- only authorized persons from among the statutory bodies and management of the Company and authorized persons from the Marketing and ESG Department, may publish information on the Company corporate social network profiles;
- it is not permissible to publish internal corporate information or corporate data on personal social network profiles, even if the communication is intended only for a limited circle of recipients;
- only posts from official channels (corporate websites and corporate social network profiles) can be shared;



- on personal profiles, it is permissible to publish only such comments on these posts and published information, the content of which is true and does not damage the reputation of the Company;
- when commenting and sharing information on the Company's corporate social network profiles, it is obligatory to follow the principles of proper behavior and restraint;
- only selected employees may create posts related to the Company on their personal profiles on the professional social network LinkedIn, with the consent of the Marketing and ESG Department of the Company;
- it is forbidden to discuss work issues through discussions on the corporate social network profiles of the Company and on personal profiles;
- it is necessary to take care that the Company is apolitical, and therefore its positions on social networks must be published in such a way that its content cannot be interpreted as the position of your employer;
- the good name of the Company must always be kept in mind.



When communicating on social networks, be sure to:

- publish only true and verified information;
- not share inappropriate or alarming messages (hoaxes) or messages with other objectionable content (e.g., messages containing misinformation, spam, etc.);
- express yourselves in accordance with the principles of decent behavior;
- maintain employee loyalty obligations towards the employer when communicating;
- maintain the obligation of confidentiality in case that this obligation is imposed on you by law or a contractual arrangement;
- avoid actions that could constitute a criminal offense of defamation.

All this especially in cases where it would be possible to connect the employee's personal social network profile with the employer.

## **SPEAK UP**

**We support a culture of open communication and the possibility to point out possible unethical or illegal behavior that is contrary to the accepted rules and values of the Company.**

**We offer employees and other persons associated with the Company opportunity to make well-founded suggestions and complaints in a way that ensures their proper review and, where appropriate, effective and quick rectification in accordance with the law, without any fear of subsequent retaliation. In this way, we ensure that unethical or illegal behavior is detected and dealt with in a transparent and responsible manner.**



By communicating legitimate concerns and complaints, you protect not only the Company as a whole, but also your colleagues, our customers and suppliers. In this way, you help minimize potential damage to the Company. However, it must always be remembered that a deliberately false accusation is not tolerated in any case. Anyone who knowingly misuses the Company's Whistleblowing System commits a violation of the rules. A person who knowingly makes a false report cannot claim protection from retaliation and is subject to sanctions under the applicable rules.

## **HOW TO SUBMIT**

In Elevion Group B.V., well-founded suggestions and complaints can be submitted:

- to the Governance, Risk & Compliance Department directly
- via Whistleblowing System: FaceUp platform

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