

INTILION

Code of Conduct & Business Ethics

The INTILION Code of Conduct manifests the principles we follow in the way we do business.



Important notices

This Code of Conduct supersedes and replaces all previous versions (including from Holding Company Hoppecke), whether electronic or hard copy.

While local language translations may be made, the original English version will remain the official version.

The Code of Conduct contains only summaries of selected **INTILION** Policies, Procedures and Operating Guidelines (the "Policies"). Please refer to the relevant Policy for the complete policy statement.

This Code of Conduct applies to all employees of **INTILION AG** (thereafter referred to as the "Company", "INTILION" or "we" as well as for third party partners of **INTILION**).

The Code of Conduct is reviewed and updated regularly. We will inform **INTILION** employees whenever a significant update has been made. The latest version of the Code is available on www.intilion.com.



Overview Of The Code

What is the purpose?

The INTILION Code of Conduct describes our values and the principles we follow in the way we do business.

Who does it apply to?

The Code applies to all INTILION employees and to third party partners.

Speak-up culture

INTILION strongly encourages it's employees to speak up and raise issues that affect the Company. There will be no dealt with in confidence.

Questions about the Code

Questions should be addressed to your line manager and or to our Compliance Manager.

Reporting concerns or breaches of the Code and violation of law

You should report in the first instance to your line manager or to our Compliance Manager or contact **ombudsman@thielvonherff.de** (whistle blowing line)

Code of conduct & business ethics

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Our Vision

Empowering the world for renewable energy.

INTILION is aiming to lead the future energy industry with the sole use of clean and renewable energy. Supported by smart energy storage solutions and supplied in a sustainable and stable energy network infrastructure: For reliable energy consumption of businesses, cities and communities, and e-mobility infrastructure.



Our Five Corporate Values

INTILION's five values are at the heart of our company, and they are embodied every day by our teams as we work together and with our partners and communities. They are the things we hold most important and define how we do what we do.



We are flexible



We customise our solutions and services. We are agile and we adjust quickly in a fast changing and growing industry.

We are value-adding



Our solutions and services are innovative and intelligent. We drive efficiencies along your value chain.

We are sustainable



We believe in enabling and supporting a better tomorrow. We develop talent and we believe in wellbeing and work-life balance.

We are collaborative



We engage with others to create partnerships. We trust and build on other's talent. We embrace diversity and champion inclusive communications with our stakeholder network.

We are reliable



We are acting with integrity. We deliver on our commitment. We are passionate about what we do.



INTILION AG Management board from left to right - Dirk Engel (CFO) and Dr. André Haubrock (CEO & Chairman of Management Board)

To #INTILIONfamily

Our shared five values of we are flexible, we are value-adding, we are sustainable, we are collaborative, we are reliable for our people underpin everything we do and are the foundation of INTILION's business principles. We are judged by how we act and INTILION's reputation will be upheld if each one of us acts in accordance with the law and the ethical standards set out in this Code of Conduct. This Code is intended to provide you with a clear overview of the obligations that each employee in the Company needs to understand. In essence, it captures not only the general business principles, but also our key and relevant Company directives. It thereby assists all of us in performing our jobs in accordance with the Company's standards.

Since January 2023 INTILION is a participant of the UN Global Compact. This means we are aiming to incorporating the Ten Principles of the UN Global Compact into strategies, policies and procedures, and establishing a culture of integrity. The Ten principles are clustered under Human Rights, Labour, Environment and Anti-Corruption. On annual basis we will report our progress we have made in the Communication on Progress (COP) report which will be published on our website.

We trust that you will support and comply with our Code of Conduct. Our Code of Conduct reflects who we are and how we work. We are therefore counting on each employee to fully embrace its content. In doing so, we can ensure that we continue to build a Company we can all be proud of. We want to live an open culture where people ask when they are unsure what compliance means in certain circumstances. We also want concerns to be raised and if you believe the Code has been breached by anyone in INTILION, you have a responsibility to report it. Retaliation against anyone who speaks up will not be tolerated.

Our reputation and our future success are critically dependent on compliance, not just with the law but with the highest ethical standards. A reputation for integrity is a priceless asset. This Code of Conduct is a further commitment to integrity for all of us and will help us to safeguard that asset.

May 2023,



Dr. André Haubrock
Chief Executive Officer



Dirk Engel
Chief Financial Officer



Introduction

The purpose of this Code of Conduct is to prescribe the important legal and ethical principles that you, as **INTILION's** employees, officer or director must observe when conducting **INTILION's** business. It is especially important since **INTILION's** success depends on the trust and respect of governments, suppliers and customers in all our locations. This Code of Conduct is a standing guide for handling business situations in an honest and professional manner and should be used in determining key business decisions and actions. The Code of Conduct therefore formulates binding requirements for all employees. Employees must comply with all relevant laws and regulations in their working environment as well as with internal directives and guidelines:

- ▶ Honest and ethical conduct including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships
- ▶ Full, fair, accurate, timely and understandable disclosure in reports and documents that we file with, or submit to others
- ▶ Compliance with applicable governmental laws, rules and regulations
- ▶ Prompt internal reporting of violation of the Code
- ▶ Accountability for adherence to the Code

These principles are not in its entirety, but they do provide important guidance about the Company's established way of doing business. Line Managers act as role models. They are responsible for their individual conduct and the conduct of their employees within their area of responsibility. Full compliance with the Company's Code of Conduct avoids reputational and legal risks for the Company. Please keep in mind that failure to comply with this Code of Conduct may result in disciplinary action for the employees concerned, up to and including termination of employment (in case of wilful violations due to breach of employment contract obligation) as well as a risk of a significant reputational damage for **INTILION**. These guidelines should be part of your daily working practices. If you need further guidance in applying them your specific situation, your line manager should be able to help you. Legal & Compliance as well as Human Resources teams are also able to provide guidance and can be contacted using the email addresses: compliance@intilion.com.

Your understanding of these principles will help to ensure that **INTILION** conducts business with uncompromising integrity and professionalism.



People And Workplace

Ethical conduct

We expect all employees to act with highest standards of honesty and ethical conduct while working on the Company's premises, at offsite locations where **INTILION**'s business is being conducted, at **INTILION** sponsored business and social events, or at any place where the employees are representing **INTILION**. In all cases, if you are unsure about the appropriateness of an event or action, please seek assistance in interpreting the requirements of these practices by contacting your line manager, Legal & Compliance or Human Resources teams are also able to provide guidance. In order to adhere to and advocate the principles and responsibilities governing this Code of Conduct, **INTILION** employees should act as follows:

- ▶ Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing their independent judgment to be compromised by their manager or others.
- ▶ Proactively promote ethical behaviour as a responsible partner among peers and subordinates in the work environment.
- ▶ Keep confidential the information acquired in the course of work except when authorised or otherwise legally obligated to disclose. Confidential information acquired in the course of work should not be used for personal advantage.
- ▶ Provide information that is accurate, complete, objective, relevant, timely and understandable.
- ▶ Act with honesty and integrity, avoiding actual or apparent conflicts of interests in personal and professional relationships.
- ▶ Comply with rules and regulations of federal, state and local governments and other applicable private and public regulatory bodies.
- ▶ Maintain control over all assets and resources employed or entrusted to them.

Environment, health and safety (EHS)

The Company is committed to providing a safe and healthy workplace for its employees and a good work-life balance and wellbeing. INTILION is also committed to conducting its business in a way that is environmentally sound.

The Company's aim is to eliminate all occupational injuries and illness, prevent pollution at source and to optimise the use of natural resources and limited raw materials. You must do your part by conducting your day-to-day activities in a way that is conducive to the health and safety of yourself and your fellow employees. In this context you are expected to:

- ▶ Behave in a manner that protects your own and your fellow employee's health and safety.
- ▶ Comply with all applicable EHS laws
- ▶ Comply with Company EHS policy, standards and guidance which are available from Human Resources
- ▶ Report accidents, near accidents, unsafe conditions and behaviours.

You are expected to actively contribute to improving EHS performance in your area of business, taking responsibility for using energy, water and other materials wisely and for reusing and recycling whenever possible.

Employment and labour laws

It is INTILION policy to act in accordance with all applicable employment and labour laws and regulations in the jurisdictions in which it operates, including:

- ▶ Compliance with all non-discrimination requirements
- ▶ Maintaining an environment where individuals are free from any harsh and inhumane treatment including any physical, sexual, psychological, verbal or visual harassment or abuse and where there is no threat of such treatment
- ▶ Observing all applicable restrictions on the maximum hours' employees are legally permitted to work
- ▶ Compliance with all applicable wage laws including those related to the minimum wages, overtime hours and all legally mandated benefits

- ▶ Requiring a minimum age requirement for employment and internships consistent with local law
- ▶ Upholding the right to freedom of associations and right to engage in collective bargaining in accordance with applicable laws and regulations.

Discrimination and harassment

INTILION prohibits discrimination or harassment of any kind including but not restricted to an employee's race, colour, religion, political affiliation, union membership, national origin and ethnicity, age, sex, marital status, physical status, or sexual orientation or gender identity and expression. Any employee who believes he or she has witnessed, or experienced discrimination or harassment must report the incident promptly to their immediate manager, the Board of Directors (even if that person is outside the individual's chain of supervision), to a representative of the Human Resources Department or the Compliance Manager. The Board of Directors and Managers informed of, or made aware of, discrimination or harassment must immediately contact the Human Resources Department who will conduct a thorough investigation and promptly take the appropriate remedial action. The employee can be certain that the matter will remain confidential and the employee acting in good faith, will suffer no reprisal retaliation for coming forward. The essential criteria for personal development, career development and promotions are performance and potential.

Community involvement

We believe in contributing to the well-being of the communities we operate in. The support of good causes through charity fund raising or voluntary activity by INTILION employees is encouraged.

Conflict Of Interest

Personal dealings

A conflict of interest occurs when an individual's private interest interfaces in any way – or even appears to interfere – with the interests of the Company as a whole.

A conflict situation can arise when an employee takes actions or has interests that may make it difficult to perform his or her company work objectively and effectively. Conflicts of interest also arise when an employee or a member of his or her family receives improper personal benefits because of his or her position in the Company – including loans to or guarantees of obligations of such persons.

Because a conflict of interest is not always clear cut and easy to recognise, employees are required to notify their line manager if they suspect they are involved or might become involved in situations that represent such a conflict. The line manager can seek guidance from the Compliance Manager if required and will advise the employee on whether a conflict exists.

Some example situations:

If an employee can influence the business situation of a supplier or customer, the employee must disclose to his or her line manager all financial, proprietary or other type of controlling or influencing interest (for example, a member of the immediate family or a close personal friend) that the employee may directly have.

An employee may not directly or indirectly conduct outside business that interferes with the proper performance of the employee's job at INTILION, is conducted during an employee's normal working hours, or utilises INTILION confidential information or specialised skills and knowledge gained as an employee of the Company. This includes becoming a contractor, consultant or supplier to INTILION while being employed at INTILION.

Insider information & trading

We protect insider information and prevent insider trading. Insider information is defined as non-public information about INTILION or its business partners which a reasonable

investor would consider important in deciding whether to buy or sell the company's securities. Such information includes for example financial results and information about possible mergers, acquisitions or divestitures, capital increases, capital market transactions, important licensing agreements and other collaborations as well as results from major clinical trials.

INTILION employees who learn about insider information in the performance of their duties, whether intentionally or by coincidence, are considered insiders. Likewise, non-employees who obtain such insider information can also be considered as insiders.

Insiders must comply with the following rules:

- ▶ Insider information must be kept strictly confidential and may not be disclosed to any non-insider within or outside INTILION, including family members
- ▶ Insiders must not buy, sell or otherwise trade in securities of INTILION or any other listed companies involved
- ▶ Insiders must not provide trading recommendations to non-insiders.

In most countries insider trading is strictly illegal and the acting insider as well as INTILION may be penalised. Even the attempt to engage in insider trading will be penalised under national and EU law.

We are all expected to:

- ▶ Protect insider information.
- ▶ Prevent insider trading for our own gain or anyone else's.
- ▶ Contact the Legal & Compliance Manager if we have a question or are uncertain about the scope or application of the INTILION Insider Directive.

Business dealings

INTILION buys all products and services based on price, quality, service levels and the ethics of its supplier. INTILION's employees with responsibility for selecting suppliers, sub-contractors and any other persons who conduct business with the Company must do this in a completely impartial and fair manner, without favour or preferences based upon any considerations other than the best interest of INTILION.



The Company's Assets

Confidential information

Confidential information includes, but is not limited to, all unpublished services, technology, products, fulfilments, data analysis, marketing, sales and financial information and agreements of INTILION and third parties such as customers. Each employee is responsible for handling such information confidentially and as the sole property of INTILION. Therefore, all disclosures of confidential information to persons not employed by the Company are made subject to an express written non-disclosure agreement (NDA) with the recipient to preserve the Company's rights in such information. NDA's must be approved by the Company's Legal & Compliance Manager).

Upon leaving the Company, every employee must certify that all confidential information obtained in the course of the employment relationship, has been returned to INTILION. The above responsibilities are further specified in the INTILION Confidentiality Agreement.

Receiving confidential information

There are many situations which require INTILION to receive or share confidential information of other parties. The employee receiving such information is responsible for handling it confidentially and for making sure that such information will not be used for any other purpose than as required during the business.

Employees may be asked by third parties to sign a non-disclosure agreement (NDA). No NDA should be signed before it has been reviewed by the Company's Legal & Compliance Manager. A copy of any signed NDA must be forwarded to the Legal & Compliance Manager for retention. The INTILION employee who is the primary contact to the party providing the confidential information has primary responsibility for the proper handling of that information. It must be treated with at least the same care as given to INTILION's own confidential information.

We must never use any illegal or unethical methods to gather competitive information. Stealing proprietary information, intentionally obtaining trade secret information in breach of

confidentiality obligations or procuring such disclosures by past or present employees or other companies is prohibited. Employees who have responsibility for collecting, retaining, using or transmitting personal data (e.g. names, addresses, phone numbers, date of birth, health information) relating to employees, or customers or other third parties, must do so with great care and sensitivity and in compliance with applicable law and policy. Advice and support can be sought from Human Resources Department or the Legal & Compliance Manager.

Release of company information

In general, requests for technical and/or product information should be directed to the appropriate operating management (project management) for review. All presentations of technical material by INTILION employees, whether in published articles or presentations to external stakeholders, must be preceded by approval of the appropriate operating management, which will be responsible for obtaining all other necessary approval. The approval process is outlined in the Company's Communication Guideline.

Use of company information

INTILION property includes, but is not limited to, INTILION funds, IT resources, equipment, information documents, records and the services of INTILION employees. All Company property should be used for legitimate business purposes. All employees should protect the Company's property and ensure its efficient use. Theft, carelessness or waste has a direct impact on INTILION's reputation and profitability. As such, any suspected fraud or theft should be immediately reported via the Company's Whistle Blowing system.

Electronic communication

Use of electronic communication can provide substantial benefits to INTILION, but misuse can expose INTILION's liability to third parties and cause damage to the Company's reputation.

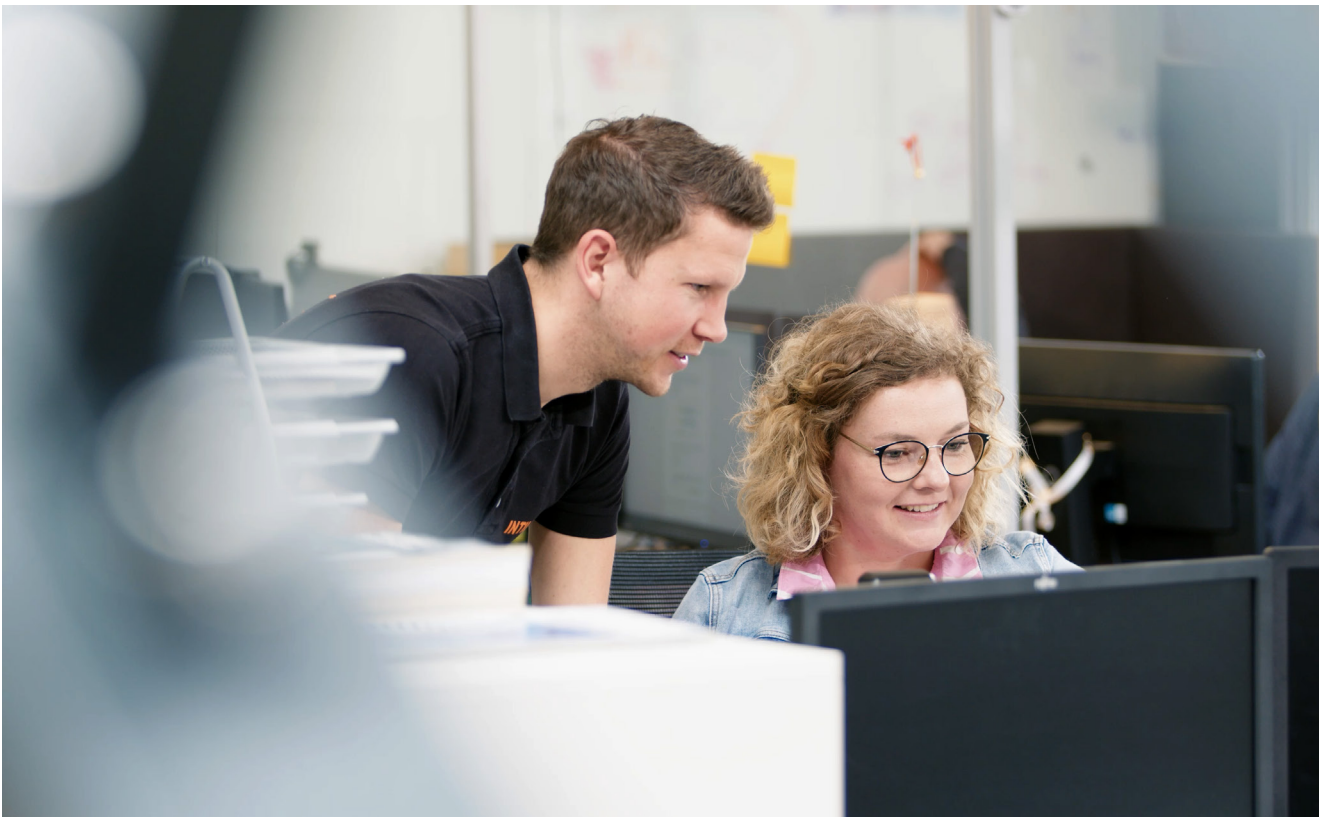
Company equipment and resources for electronic communication may be used for Company business only. Employees may only use the communication channels for which they

have received authorisation. The following are specific guidelines regarding the use of electronic communication with which each employee must comply. Additional guidelines can be found in INTILION's Intranet.

1. Confidential information: Under no circumstances Company's confidential information is to be transferred by any means to persons not employed by the Company unless an NDA (available from the Legal & Compliance Manager) has been signed by the intended recipient.
2. Inappropriate Material: Company employees are prohibited from being involved in any way in the exchange of inappropriate material such as pirated software, stolen passwords, credit card numbers, inappropriate written or graphical material (e.g. pornography), etc.
3. Loading Software: Employees must notify the appropriate IT Department prior to loading software (whether purchased, downloaded, free- or shareware) on their computer, including but not limited to the following: screen savers, applications, bitmaps, jpeg, avi, mpeg or any other application or file.

Additional guidelines are included in the INTILION Software Purchasing and Management Policy, which can be found in the Company's Intranet.

INTILION reserves the right to examine employees' emails, directories, files and other information stored on the Company's computers, tapes, hard drive disks, etc. if an offence is suspected.





Social Media

INTILION recognises the importance of the internet in shaping public thinking about our current and potential services and solutions, employees, suppliers and customers. We also recognise the importance of our employees joining in and helping shape the industry conversation and direction through blogging and interaction in social media.

INTILION strongly discourages employees from discussing publicly and work-related matters, whether confidential or not, outside the company-authorised communications channels. Unless given written permission by the Executive Board employees are not authorised to speak on behalf of INTILION. The further process is outlined in the Company's Communication Guideline which can be found on the Intranet.

Personal use of Social Media

Employees who use social media and choose to identify themselves as employees of INTILION are strongly encouraged to state explicitly, clearly and in a prominent place that the views expressed are their own and not those of INTILION. Employees may not use INTILION's logo or trademarks or the name, logo or trademarks of any business partner, supplier, vendor, affiliate or the holding company on any personal blogs or other online sites prior to the Company's approval. The approval process is outlined in the Communication Guideline which can be found on the Company's Intranet. Employees may not post on personal blogs or social media

websites photographs of company events, other employees or company representatives engaged in INTILION's business, or company products, unless they have express permission to do so. The approval process is outlined in the Communication Guideline which can be found on the Company's Intranet.

Company use of Social Media

Only employees designated or authorised by INTILION can prepare content for or delete, edit or otherwise modify content on INTILION's blog, YouTube channel etc.

Employees who want to post comments in response to the content on INTILION's blogs should identify themselves as employees and state that the views expressed are their personal views and do not represent the views of the Company. Any employee developing and maintaining a website or writing a blog that mention INTILION and/or current or potential services & solutions, employees, suppliers, customers and competitors must identify themselves as an employee of INTILION and state that the views expressed are their personal views and do not represent the views of the Company.

Data privacy

The right to privacy is a fundamental human right. The protection and responsible use of personal data is reflected in our daily operations. We see data as a valuable element for developing innovative solutions to enable the transition to a clean and green energy use and as a driver for business excellence. As such, we strive to be a respect-

ed and preferred partner to all who may provide such data. We are committed to collecting and using data in a lawful, fair, legitimate and ethical way, and will always respect the privacy of individuals in order to earn and deserve their trust. **INTILION** assumes accountability for the compliant processing of personal data by itself or by its trusted service and cooperation partners.

Any information related to an identified or identifiable person must be collected and processed in compliance with applicable data privacy laws (e.g. EU General Data Protection Regulation). **INTILION** employees with access to such personal data are expected to apply the privacy principles of lawful, fair and transparent data processing, respecting any purpose limitations, as well as the principles of data minimisation, accuracy, storage limitation, integrity and confidentiality.

To enforce the Protection of Data Security each Company's employee must sign a 2-page Declaration of commitment, to which express reference is made. In this regard **INTILION** cooperates with all responsible public bodies and supervisory authorities. Any communication in this context may only be made via our data privacy official. Contact details can be found on the Company's Intranet.

Intellectual property

All inventions, ideas and concepts conceived, made or acquired by an employee in the course of their employment are and will remain **INTILION**'s property, not the employees, if they relate to any aspect of **INTILION**'s business. **INTILION** vigorously protects its rights to such property and, in order to formally implement the above responsibility, a respective paragraph is included in the employment contract. Under that agreement, employees acknowledge that the results of their labour for the Company, including all work eligible for copyright, patent or other legal protection, is owned by the Company. Employees also agree to comply with the **INTILION** policies designed to prevent the disclosure of unpublished Company information outside the Company and not to make use of the confidential information or trade secrets of former employers or business associates in the performance of duties for **INTILION**.

INTILION respects the intellectual property rights of third

parties, such as its customers and suppliers. In case third parties share their technology or know how with **INTILION**, **INTILION** share adhere to the applicable legislation and not infringe upon the third party's intellectual property rights.

Political donations

The funds the Company generates must only be used for legitimate business purposes. Any contributions (in whatever form, being it cash, loans, equipment, technology etc.) to public/government officials or authorities are strictly prohibited by this Code.

The granting of advantages to public/government officials may be punishable as the acceptance or granting of an advantage simply because it is made in view of the official position. It is not necessary that the performance of official duties be influenced in an unfair manner. Anyone entrusted with the performance of public duties can be a public official, not only civil servants and public employees.

Political activities

INTILION supports the right of all employees to take an active part in political processes in their own time and using their own resources. However, any political affiliation must be expressed individually and not as the view of **INTILION**. Employees must not circulate or post political material on Company notice boards, or premises. Employees may not engage in political activities on **INTILION** time or use **INTILION** funds, facilities, equipment, communication channels or other resources for such purposes without the prior written approval their Management Board or the Legal & Compliance Manager. All employees must report to the Management Board or the Legal & Compliance Manager if they intend to stand for public office election as a candidate. The Company takes its responsibility to comply with laws and regulations very seriously and employees are expected to comply with applicable legal requirements and prohibitions. While it is impossible for anyone to know all aspects of every applicable law, employees should understand the major laws and regulations that apply to their work. In case the employees have any questions regarding legislations, they should refer to the Legal & Compliance Manager.



Legal Compliance

Child labour

Child labour is a violation of fundamental human rights. According to international standards, work must not be performed by anyone under the minimum working age (usually 15 or higher if stipulated by national law). 'Work' refers to any work at INTILION, including work done under apprenticeships, or training and work/study schemes; it includes contractual, temporary or casual work, as well as on-site subcontracted work (waste, catering, delivery, cleaning, building works, etc.). This guidance applies to all INTILION suppliers and INTILION's entire supply chain – upstream and downstream including material & parts suppliers, subcontractors.

Modern slavery

INTILION is committed to acting ethically and with integrity in our business relationships. This includes taking steps to ensure that there is no slavery, servitude, forced or compulsory human labour, human trafficking, child labour, debt bondage and deceptive recruiting for labour (collectively known as "Modern Slavery") in any part of our business or in our supply chain.

INTILION expects its service providers, suppliers and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or within its supply chain.

Adherence to the matters of Modern Slavery is a condition precedent of all our Supply of Services and Supply of Goods agreements.

Prohibition of corruption and bribery

Every INTILION employee must uphold and be seen to always uphold the highest ethical standards. It is prohibited for INTILION employees and representatives of INTILION to offer, promise or provide anything of value with the intention to gain any commercial, contractual, regulatory or personal advantage.

Employees are specifically prohibited from making payments or handing out gifts intended to influence any public official

to use his or her position in order to assist the Company in obtaining or retaining business for or with, directing business to, or offer a favourable ruling, decision or award to INTILION or to any other person.

Anyone who does not observe the rules on gifts and invitations in the following sections runs the risk of becoming liable to prosecution for corruption offenses. Even the promise or demand of unfair advantages can be punishable.

Receiving gifts, gratuities, fees, etc.

To avoid even the appearance of favouritism toward any person or company to whom INTILION has a business relationship, INTILION employees are not permitted to solicit or accept any payment or gift or any favour of value from such persons or companies. This prohibition includes, but is not limited to, commissions, securities or other shares of profit, any expense paid trip whether for business or pleasure, entertainment other than customary and reasonable sales-related entertainment, and gifts of money in any amount. Employees are required to report all such requests to accept payment to their manager within 24 hours.

INTILION expects its suppliers and vendors to comply with these principles. Should a supplier or vendor be found making any payment or gift in breach of this Code of Conduct, INTILION will take appropriate action, including, but not limited to, terminating the contractual relationship with such a supplier or vendor for breach of contract and reporting the supplier or vendor to the relevant authorities.

Exception for gifts of nominal value

This policy is not prohibiting the giving of non-cash gratuities or gifts of nominal value when appropriate and customary, such as give-a-aways and promotional items carrying the INTILION name or logo. Gifts of nominal value are not prohibited if under 50 EUR and frequency is no more than once per month. In case of doubt whether to provide a non-cash gratuity or a gift, the employee needs to contact the Legal & Compliance Officer. The acceptance of any cash payments is strictly prohibited.

Sales and marketing

We will only be able to build long-term, quality relationships with our customers if we demonstrate honesty and integrity. All our marketing and advertising will be accurate and truthful. We will only obtain business legally and ethically ensuring compliance with relevant legislation including where applicable Foreign Corrupt Practices Act (FCPA) requirements.

Anti-trust policy

Anti-trust laws strictly forbid any agreement which would interfere with free trade or limit competition. This prohibition applies to companies as well as individuals who violate these laws. It includes the prohibition of interfering with free trade and prohibition to limit competition, includes not only written agreements but also unwritten understandings and even informal discussion regarding pricing or markets among competitors. The individuals or representatives present at such a discussion may be found to have violated anti-trust laws even if they did not participate in the discussion. In case INTILION employees or representatives ever find themselves engaged in such conversations or meeting with competitors, they must end the conversation and leave the meeting immediately. The INTILION employee or representative shall then immediately report in writing to his or her manager what was discussed and what the exact role of the INTILION employee or representative.

INTILION employees may not have any direct or indirect discussions with competitors or enter into any express or implied agreements with competitors regarding pricing, terms and conditions, customers, markets, suppliers, employment conditions, geographical divisions or any other important aspects of the Company's business. Nor may INTILION employees share any INTILION sales data with competitors directly or indirectly, without prior written approval of the Legal & Compliance Manager.

Money laundering

INTILION is not, and will not be, involved in the illegal sale of its products, solutions and services. Furthermore, INTILION is committed to do everything under the Company's trust

from ending up on the illegal market. Under no circumstances may INTILION employees engage in any activities that aimed at illegal sale of INTILION's products, services or solutions, or aimed at evading INTILION's efforts to prevent INTILION's products from ending up on the illegal market.

INTILION actively manages its business to prevent association with money laundering activities. In most countries it is a crime to engage in activities that have the effect of helping criminals hide or "launder" money derived from criminal activity, such as smuggling, dealing in contraband, tax evasions and violations of foreign exchange controls or narcotics trafficking. Unusual requests, such as requests to pay for goods or services from or to transfer funds to accounts outside the customer's home country or the accounts of a third party, such as customer's law firm or accountant, may be indicative or attempt to engage in money laundering. If the source of the money is suspicious, it must be reported to the Legal & Compliance Manager.

Product safety

INTILION is committed to ensuring that the products, services and solutions are of the highest standards of quality, safety and reliability. This is achieved through rigorous conformance to applicable laws, industry standards, regulations, policies and procedures. INTILION's quality management system is ISO 9001 certified.

Different laws in different countries

The Company does business on European level, and we are committed to obeying the laws and regulations of all countries in which we work. Sometimes these laws may be less restrictive than the rules set out or referred to in the Code or the other relevant Company policies. In these cases, we will follow this Code and our Company Policies.

Competitive information

We must never use any illegal or unethical methods to gather competitive information. Stealing proprietary information, intentionally obtaining trade secret information in breach of confidentiality obligations or procuring such disclosures by past or present employees of other companies is prohibited.

Conflict minerals

In response to serious human rights violations in the mining of certain minerals in the Democratic Republic of the Congo (DRC) and surrounding countries, the U.S. Securities and Exchange Commission (SEC) has adopted rules to implement reporting and disclosure requirements related to conflict minerals – tin, tantalum, tungsten and gold – as directed by the Dodd-Frank Wall Street Reform and Consumer Protection act of 2010.

INTILION supports the humanitarian goals of Dodd-Frank Act. However, **INTILION**'s energy storage solutions and services include lithium – ion batteries. Lithium is considered as rare earth material and raises environmental concern, but Lithium is not classified as conflict mineral. **INTILION** does no manufacturing or subcontract manufacturing of parts/units. **INTILION** purchases units, parts and components primarily from well-known certified battery manufacturers who also serve the automotive industry. **INTILION** does purchase any material, parts or components which obtain Conflict Minerals.

Financial Integrity

Accounting policies

INTILION must comply with all laws relating to the accurate and complete maintenance of Company financial books and records. No Company funds or property can be used for any unlawful, improper or unethical purpose. No undisclosed or unrecorded funds or assets can be established, and no false or improper entries can be made in INTILION's books and records must be maintained in accordance with generally accepted accounting principles, INTILION policies and with the local laws governing the maintenance of corporate books and records.

Fraud

The Company is committed to the prevention of fraud within the Company and to the rigorous investigation of any such cases, and, where fraud or other criminal act is proven, to ensure that wrongdoers are appropriately dealt with. The Company also regards any actions taken by any individual to obtain a personal benefit or deprive another person or company of a benefit or that mistakes and financial or other Company information or performance as "fraudulent" for these purposes, even where such misstatement does not result in any direct financial gain for the individual involved.

Corporate sponsorship

INTILION welcomes and encourages charity and sponsorship activities undertaken by our employees. However, INTILION employees who manage corporate sponsorship should know that making any contributions to a charity or undertaking sponsorship activities might expose INTILION to a greater risk of public criticism. Any Corporate Sponsorship activity requires approval by the Board of Directors. Contributions to a charity or corporate sponsorship should not be used to influence or appear to influence third parties or business purposes.

Any suspicion of bribery should be always avoided. Therefore, it is of the utmost importance to make sure the relationship between INTILION and the sponsored agency

or organisation is transparent and that the highest ethical standards and all accounting policies are adhered to.

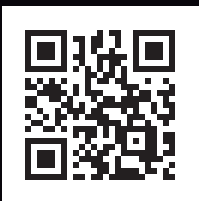
When making any contributions to a charity or undertaking any sponsorship activities, INTILION employees shall inform the Legal & Compliance Manager in advance via compliance@intilion.com.

Whistleblowing

If you believe that a breach of the INTILION Code of Conduct has taken place or if you have suspicions of professional misconduct or incidents, you must report this immediately via the Company's Whistle Blowing procedure.

For this purpose, INTILION has engaged with an independent external party where you can raise your concerns anonymous and confidential. You can use the following email address: ombudsmann@thielvonherff.de. Any such disclosure will be treated in confidence and immediately investigated. Following such an investigation, a report will be given to the reporting employee about the outcome of the investigations and of any actions proposed.

INTILION



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All information in this brochure are based on the current status of technology. Our products are subject to continuous further development, therefore we reserve the right to make changes. All illustrations similar.