

INTILION

Code of Conduct

The INTILION Code of Conduct reflects the principles that guide the way we do business.





At a Glance

What does the Code of Conduct cover?

This Code of Conduct (hereinafter referred to as the “Code” or “Code of Conduct”) of INTILION GmbH (hereinafter referred to as “INTILION” or “we”) sets out the values and principles that guide the way we conduct our business.

Who does the Code apply to?

The Code applies to all INTILION employees.

Fostering a Speak-Up Culture

INTILION strongly encourages all employees to raise and report concerns affecting the company. No person who raises a concern or reports an actual or suspected breach of this Code will be subjected to retaliation. All reports will be treated confidentially

Questions About the Code

Questions about the Code should be directed to the relevant department managers, the Human Resources department or the Legal & Compliance department

Reporting Suspected Breaches of the Code and Violations of the Law

Suspected breaches of this Code and/or violations of the law may be reported to the relevant department managers, the Human Resources department, the Legal & Compliance department, via the internal whistleblowing system at <https://hoppecke0.sharepoint.com/sites/int-compliance/SitePages/Whistleblowing.aspx>, or to the ombudsman (attorney-at-law Thiel von Herff) at ombudsman@thielvonherff.de (Whistleblowing Line).

Effective Date and Authoritative Version

This Code, including any updates, enters into force on the date of its announcement and supersedes all previous versions, whether electronic or printed. The Code is not intended to remain valid indefinitely. It is reviewed and updated regularly. We will inform all INTILION employees when a significant update has been made. The current version is published at <https://intilion.com/nachhaltigkeit/>.

Although translations of the Code of Conduct may be prepared in other languages, the English version shall prevail and be binding in the event of any discrepancies or differences.

INTILION GmbH Code of Conduct

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Our Vision

Enabling the world for renewable energy.

We aim to lead the energy industry of the future, relying exclusively on clean and renewable energy. Through intelligent energy storage solutions, we provide sustainable, stable grid infrastructure to ensure a reliable power supply for businesses, cities and municipalities, as well as effective e-mobility infrastructure. We are driving the energy transition and leading the way towards clean energy



Our Corporate Values

Our four corporate values are at the heart of our company. Our teams put them into practice every day when working with our partners and stakeholders. They reflect what matters to us and define how we work.



We believe in people who take ownership, drive change, and never stop growing.

- ▶ You take action, think ahead and drive initiatives forward, from the initial idea to the final result.
- ▶ You bring fresh perspectives, courageously challenge the status quo and find smart solutions.
- ▶ You continuously strive to improve, actively seek feedback and deliberately take on new challenges.

We adapt fast to empower our customer success.

- ▶ You think in terms of solutions and respond flexibly when circumstances change.
- ▶ You stay close to our customers and partners, proactively anticipating their needs.
- ▶ You prioritise delivering an effective 80% solution quickly rather than delaying progress in pursuit of perfection.

We grow value through trust and shared ambition.

- ▶ You address issues openly, share knowledge and keep others informed.
- ▶ You work across departments because shared growth depends on collaboration.
- ▶ You build relationships that work in the long term, with foresight and reliability.

We build partnerships that drive sustainable impact.

- ▶ You make decisions with a long-term perspective, prioritising quality and lasting value.
- ▶ You cultivate internal and external relationships based on respect, clarity and reliability.
- ▶ You ensure that collaboration remains successful in the future by acting with foresight and a commitment to sustainability.



f.l.t.r. Hubertus Jakobi (CEO) and Carl Zoellner (CCO)

To the INTILION Team

Our four corporate values guide the way we do business and form the foundation of our business principles. We are judged by our actions, and **INTILION**'s reputation can only be maintained if each of us acts in accordance with the law and the ethical standards set out in this Code. This Code is intended to provide you with a clear overview of the principles we live by. It contains not only general business principles but also a summary of selected key company policies. It therefore helps all of us perform our duties in line with our corporate principles.

INTILION has been a participant in the UN Global Compact since 6 February 2023. This means that we strive to integrate the Ten Principles of the UN Global Compact into our strategies, policies and procedures and to foster a culture of integrity. These principles provide universal guidance on responsible and sustainable business conduct in the areas of human rights, labour standards, the environment and anti-corruption. We will report annually on our progress in implementing these principles in a Communication on Progress (CoP), which will be published on our website.

We trust that you will support and comply with our Code of Conduct. Our Code reflects who we are and how we work, and we expect every employee to follow it in their day-to-day activities. By doing so, we can continue to build a company of which we can all be proud. We are committed to an open speak-up culture and encourage all employees to ask questions whenever they are unsure about compliance with the Code or applicable laws. We also encourage employees to voice any concerns they may have about the Code. All employees are required to report suspected violations of the Code or the law. Retaliation of any kind against anyone who reports a violation in good faith will not be tolerated.

Our reputation and future success depend not only on complying with the law but also on upholding the highest ethical standards. A reputation for integrity is an invaluable asset. This Code of Conduct represents a commitment to integrity by all of us and will help us protect that asset.

Paderborn, January 2026,

Hubertus Jakobi (CEO)
Managing Director

Carl Zoellner (CCO)
Managing Director



Introduction

The purpose of this Code is to establish key legal and ethical principles that all **INTILION** employees must observe when carrying out their duties for **INTILION**, regardless of their position within the company. This is particularly important because **INTILION**'s success also depends on the trust that our suppliers, customers and the public place in our integrity.

This Code serves as an ongoing guide to handling business matters honestly and professionally and should be consulted when making important business decisions and taking action. It therefore sets out binding requirements for all employees, particularly in relation to:

- ▶ Honest and ethical conduct, including the management of conflicts of interest, particularly actual or potential conflicts between personal and professional interests.
- ▶ Full, transparent, accurate and understandable disclosure of information about **INTILION**'s business activities in reports and documents submitted to third parties.
- ▶ Compliance with applicable laws and other standards in the countries in which we operate.
- ▶ Prompt internal reporting of breaches of the Code and/or violations of the law.
- ▶ Personal responsibility for compliance with the Code.

These principles are not exhaustive, but they provide important guidance on our established way of doing business. Man-

agers are expected to act as role models. They are responsible for their own conduct and that of the employees within their areas of responsibility. Full compliance with the Code helps prevent reputational damage and adverse legal consequences. Please bear in mind that failure to comply with this Code may result in disciplinary action against the employees concerned, up to and including termination of employment in the event of wilful breaches of contractual employment obligations.

These guidelines should therefore form part of your daily working practices. If you need further assistance applying them to a particular situation, your manager can provide support. The Legal & Compliance and Human Resources departments can also provide guidance and can be contacted at hr@intilion.com and compliance@intilion.com

Understanding these principles will help ensure that **INTILION** conducts business with uncompromising integrity and professionalism.



People and the Workplace

Ethical Conduct

We expect all employees to uphold the highest standards of honesty and ethical conduct while working on company premises, at external locations where they carry out work for INTILION, at INTILION sponsored business or social events, and wherever they represent INTILION. Accordingly, all INTILION employees should observe the following principles of conduct:

- ▶ Always act in good faith, responsibly, with due care and diligence. Do not misrepresent facts or allow your independent judgement to be compromised by your manager or anyone else.
- ▶ Proactively promote and support ethical conduct among your colleagues.
- ▶ Always treat information obtained in the course of your work as confidential unless you are authorised to disclose it or are otherwise required to do so, for example by law or by an official order issued by an authority or court. Confidential information must not be used for personal gain.
- ▶ Provide only information that is accurate, complete, objective and understandable.
- ▶ Act honestly and with integrity, avoiding conflicts

- ▶ between personal and professional interests.
- ▶ Comply with all applicable laws and regulations at all times.
- ▶ Take due care of all assets entrusted to you and use them as efficiently and resource-consciously as possible.

Environment, Health and Safety at Work

INTILION is committed to providing all employees with a safe and healthy working environment and recognises the importance of a work-life balance that supports employee well-being. INTILION is also committed to conducting all its business activities in an environmentally responsible manner.

The company's aim is to prevent all occupational injuries and illnesses, prevent pollution at its source, and optimise the use of natural resources and finite raw materials. In this context, employees are expected to:

- ▶ Act in a manner that protects their own health and safety and that of their colleagues.
- ▶ Comply with applicable legal requirements and internal rules on occupational health and safety, fire protection and environmental protection in their daily work. These are available from the Human Resources

department.

- ▶ Report all workplace accidents, near misses, unsafe conditions and behaviours that could endanger their own health and safety or that of their colleagues without delay.
- ▶ Take responsibility for using energy, water and other materials wisely, and for reusing and recycling materials whenever possible

Labour Standards & Employee Protection

INTILION is committed to complying with all applicable labour standards and employee protection regulations in the countries in which we operate. In particular, this includes:

- ▶ Complying with all anti-discrimination requirements.
- ▶ Maintaining a workplace free from any form of inhumane treatment, including physical, sexual, psychological, verbal or visual harassment, abuse or threats.
- ▶ Complying with all applicable limits on employees' maximum working hours.
- ▶ Complying with all applicable rules on minimum wages, overtime pay and allowances.
- ▶ Observing the statutory minimum age for employment.
- ▶ Respecting the rights to freedom of association and collective bargaining.

Prevention of Discrimination and Harassment

INTILION prohibits discrimination and harassment of any kind, including but not limited to discrimination based on skin colour, religion, political affiliation, trade union membership, national origin or ethnicity, age, sex, financial circumstances, physical condition, sexual orientation, gender identity or gender expression.

Employees who believe that they have witnessed or experienced discrimination or harassment are expressly encouraged to report the incident without delay to their manager, the Management Board (even if the person concerned is outside their reporting line), the Human Resources department, the Legal & Compliance department, via the internal whistleblowing system (<https://hoppecke0.sharepoint.com/sites/int-compliance/>

[SitePages/Whistleblowing.aspx](#)), or to the ombudsman (attorney-at-law Thiel von Herff) at ombudsman@thielvonherff.de (Whistleblowing Line).

All employees can be assured that reported incidents will be treated confidentially and that no one will face retaliation for making a report, provided it is not deliberately false. All reported incidents will be thoroughly investigated and, wherever possible, appropriate corrective measures will be taken promptly.

As INTILION does not tolerate discrimination or harassment of any kind, the only decisive criteria for recruitment, hiring, personal development, career progression and promotion are an individual's performance and potential.

INTILION also promotes and requires non-discriminatory and inclusive language, both within the company and in communications with third parties. All employees are therefore expected to follow the recommendations in the "Guidelines for Respectful Communication" ("Leitfaden respektvolle Kommunikation") in their everyday language. The guidelines can be found in the document management section of the intranet

Community Involvement

We believe that together we can contribute to social well-being. INTILION encourages employees to support charitable causes through fundraising campaigns or voluntary activities.

Conflicts of Interest

Personal Dealings

A conflict of interest arises when the interests of different parties conflict in any way, or even appear to conflict.

In a professional context, a conflict of interest may arise when employees engage in activities or pursue interests that make it difficult for them to perform their work objectively and in the company's best interests. Conflicts of interest also arise when employees or their family members receive improper personal benefits as a result of their position within the company, including loans or guarantees relating to the obligations of the persons concerned.

Because conflicts of interest are not always obvious or easy to identify, all employees must inform their manager if they suspect that they are or may become involved in a situation that could give rise to such a conflict. Managers may seek advice from the Legal & Compliance department, which will provide guidance to the employees concerned.

Examples of situations that may give rise to conflicts of interest include the following:

If employees are in a position to influence a supplier's or customer's business situation, they must disclose to their manager any financial or other controlling interests that could affect the business matter, including interests held by a family member or close personal friend.

Employees must not, directly or indirectly, engage in business activities or secondary employment that interfere with their contractual working hours or the performance of their duties for **INTILION**. Nor may they use **INTILION**'s confidential information or specialised skills and knowledge acquired through their employment for such purposes. In particular, simultaneous activities for **INTILION**'s competitors, contractors or suppliers, or acting as a consultant to **INTILION**, are not permitted.

Insider Information and Insider Trading

Insider information refers to confidential, non-public information concerning **INTILION** or its business partners that a reasonable investor would consider important when deciding whether to buy or sell a company's securities. Examples include financial results; information about potential mergers, acquisitions or disposals; capital increases; capital market transactions; significant licensing agreements and other collaborations; and results from major clinical trials.

INTILION employees who obtain insider information in the course of their work, even unintentionally, are considered insiders. The same applies to third parties who obtain such information. Anyone considered an insider must comply with the following requirements:

- ▶ Insider information must be treated as strictly confidential and must not be disclosed to persons who are not insiders, either within or outside **INTILION**, including family members.
- ▶ Insiders must not buy, sell or otherwise trade in shares of **INTILION** or other listed companies concerned.
- ▶ Insiders must not pass on trading recommendations to persons who are not insiders.
- ▶ In most countries, insider trading is strictly prohibited and may give rise to criminal liability for both the individual insider and **INTILION**. Even an attempt to engage in insider trading may be punishable under national and EU law.

We therefore expect all **INTILION** employees to:

- ▶ Protect insider information.
- ▶ Prevent insider trading for their own benefit or for the benefit of others.
- ▶ Contact the Legal & Compliance department if they are uncertain whether information constitutes insider information or what obligations arise from possessing it.

Business Relationships

Business transactions with suppliers of goods, service providers and other business partners must be based exclusively on objective criteria: the prices offered, the scope of services, the known or expected quality of performance, and the business partners' ethical principles. **INTILION** employees responsible for selecting business partners must make their decisions fairly and impartially, without arbitrarily favouring

any business partner and always acting in **INTILION**'s best interests.



Handling Confidential Information

Confidential information includes, among other things, any unpublished information concerning services, technologies, products, contractual performance, data analyses, marketing, sales and financial matters, as well as other agreements between INTILION and third parties, such as customers. All INTILION employees must treat such information confidentially and protect INTILION's rights in that information at all times. Confidential information may therefore only be disclosed to third parties once a written non-disclosure agreement (NDA) has been concluded. NDAs must be submitted to the Legal & Compliance department for review and approval before they are signed.

Employees leaving the company are required to maintain the confidentiality of all confidential information obtained during their employment, even after their employment has ended. This obligation is explained in greater detail in the confidentiality agreement forming part of the employment contract.

Receiving Confidential Information

INTILION may receive confidential information from other parties in many different situations. Employees who receive such information are responsible for keeping it confidential and ensuring that it is not used for any purpose other than what is necessary for the company's business activities.

If a third party asks employees to sign its NDA, the agreement may only be signed after it has been reviewed and approved by the Legal & Compliance department. A copy of every signed NDA must be forwarded to Legal & Compliance for retention. INTILION employees who serve as the main point of contact for the party providing the confidential information bear primary responsibility for ensuring that the information is handled properly. Such information must be protected with at least the same degree of care as INTILION's own confidential information.

Illegal or unethical methods must never be used to gather competitive intelligence in day-to-day work. Stealing protected information or obtaining trade secrets by breaching confidentiality obligations, including through former employees

of INTILION or other companies, is prohibited. Employees responsible for collecting, storing, using or transferring personal data relating to other employees or third parties (e.g. names, addresses, telephone numbers, dates of birth and health data) must exercise particular care and sensitivity and comply with applicable laws and policies. Advice and support are available from Human Resources and Legal & Compliance.

Disclosure of Company Information

All requests for technical and/or product-related information must be submitted to the responsible specialist department (Project Management) for review. Any presentation of technical material by INTILION employees, whether in published articles or presentations to external stakeholders, must be approved by the responsible operational management, which is also responsible for obtaining any further approvals required

Use of Company Property

INTILION's property includes, among other things, operating equipment, IT equipment (hardware and software), information materials, records and the services provided by INTILION employees. All company property must be used for legitimate business purposes. Employees must handle company property responsibly and protect it against theft, damage and misuse, as such incidents could adversely affect INTILION's reputation and profitability. Any suspected unlawful conduct must be reported immediately to the company's management, the Legal & Compliance department or via the company's whistleblowing system.

Electronic Communication

Electronic communication offers many advantages but, if misused, can expose INTILION to significant liability and reputational risks. INTILION employees may therefore use only the communication channels they have been authorised to use. Company laptops, tablets and mobile devices provided for work must not be used for non-business purposes. The following key guidelines apply to the use of these devices, including electronic communication, and must be observed

by all employees. INTILION reserves the right to establish additional binding communication requirements through company policies published on its intranet.

1. Confidential information: INTILION's confidential information must never be shared with persons outside the company unless the intended recipient has signed a non-disclosure agreement.
2. Inappropriate material: Employees must not participate in any exchange of inappropriate material, such as pirated software, stolen passwords, credit card numbers, inappropriate written or graphic content (e.g. pornography), or similar material.
3. Downloading and installing software: All employees must notify the responsible IT department before downloading or installing software on company-provided devices, whether purchased software, freeware or shareware. This includes, but is not limited to, screensavers, applications, bitmaps, JPEG, AVI and MPEG files, or any other applications or files.

Further information is available in INTILION's "General Information Security Policy" ("Allgemeine Richtlinie zur Informationssicherheit"), which can be found on the company intranet.

INTILION reserves the right to inspect emails, directories,

files and other information stored on company-provided laptops, tablets, mobile devices, external data carriers or other company storage media where a breach of these principles is suspected.

Use of Social Media

INTILION recognises the role of the internet in shaping public opinion about our current and potential products, services, employees, suppliers and customers. We also recognise the importance of employees helping to shape conversations and developments within the industry through blogging and interaction on social media.

INTILION strongly advises all employees against discussing public or work-related matters, whether confidential or not, outside company-approved communication channels. Without the prior written approval of the Management Board, employees are not authorised to represent INTILION in public discussions.

Personal Use of Social Media

Employees who use social media and identify themselves as INTILION employees in public discussions are strongly encouraged to make it clear that the views they express are their own and do not represent those of INTILION.



Employees may not use **INTILION**'s logo or trademarks, or the name, logo or trademarks of a business partner, supplier, vendor or HOPPECKE Group company, on personal blogs or other websites and networks without express authorisation. Likewise, **INTILION** employees must not publish photographs of company events, other employees, business partners or **INTILION** products on personal blogs or social media websites unless they have obtained the express approval or consent of the persons or companies concerned.

Use of Social Media by INTILION

Only employees designated or authorised by **INTILION** may create, delete, edit or otherwise modify content for **INTILION**'s blog, YouTube channel and similar channels.

Employees who wish to comment on **INTILION** blog posts should clearly indicate that their comments express their personal views and do not represent the views of the company.

The same applies to employees who, without the relevant authorisation, develop and/or maintain a website or write a blog post mentioning **INTILION** and/or its current or potential services and solutions, employees, suppliers, customers or competitors.

Data Protection

The right to privacy is a fundamental human right.

Protecting personal data and handling it responsibly are integral to our daily work. We regard data as a valuable resource for developing innovative solutions that enable the transition to clean, environmentally friendly energy use and as a driver of outstanding business performance. We therefore aim to be a respected and preferred partner for those who entrust us with their data. We are committed to limiting the processing of personal data to what is necessary under the applicable legal requirements (the German Federal Data Protection Act and the EU General Data Protection Regulation) and to complying with the relevant data protection principles in all processing activities.

All information relating to an identified or identifiable individual must be collected and processed in accordance with applicable data protection laws, such as the German Federal Data Protection Act (Bundesdatenschutzgesetz, BDSG) and the EU General Data Protection Regulation (GDPR). **INTILION** employees with access to such personal data are expected to apply the principles of data protection, including purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality.

To enforce data protection requirements, all employees must sign a two-page confidentiality and data protection undertaking, to which explicit reference is made here. We cooperate with all competent public bodies and supervisory authorities. Communication with these bodies on data protection matters is handled through our Data Protection Officer. Their contact details can be found on the intranet and on our website under "Data Protection Information – **INTILION**" ("Datenschutzinformation – **INTILION**")

Intellectual Property

All rights to inventions, ideas and concepts developed in a professional context constitute **INTILION**'s intellectual property if they relate in any way to **INTILION**'s business activities. **INTILION** actively protects its intellectual property rights. All **INTILION** employees are therefore contractually required to acknowledge that the results of their work for the company, including any work that may be protected by copyright, patents or other intellectual property rights, are the company's intellectual property. Employees also undertake to prevent the disclosure of unpublished company information outside **INTILION** and not to use confidential information or trade secrets belonging to former employers or business partners in the performance of their duties for **INTILION**.

INTILION, in turn, respects the intellectual property rights of third parties, such as its customers and suppliers. When third parties share their technology or expertise with **INTILION**, we comply with applicable legislation and do not infringe their intellectual property rights.

Political Donations

Funds generated by the company may only be used for legitimate business purposes. This Code prohibits benefits of any kind to public officials or public authorities.

Granting benefits to public officials may constitute a criminal offence involving the granting or acceptance of an undue advantage merely because the benefit is provided in connection with the recipient's official position. Improper influence over the exercise of official duties is not a prerequisite. Anyone entrusted with the performance of public duties may qualify as a public official.

Political Activities

INTILION supports the right of all employees to participate actively in political processes in their free time and using their own resources. However, any political affiliation must be expressed as an individual opinion and must not be presented as **INTILION**'s position. **INTILION** employees may not distribute or display political materials on company noticeboards or on company premises.

Without the prior written approval of the Management Board, employees may not engage in political activities during working hours or use **INTILION** property, facilities, communication channels or other resources for such purposes. All employees must inform the Management Board or the Legal & Compliance department if they intend to stand for election to public office.



Compliance

Prohibition of Child Labour

Child labour constitutes a violation of fundamental human rights. Under international standards, no work may be performed by persons below the minimum legal working age (generally 15 years, or a higher age where required by national legislation). For this purpose, “work” includes any activity performed for **INTILION**, including vocational training, work-study programmes, temporary assignments (including agency work) and similar activities. These principles must also be observed by all **INTILION** suppliers, customers and business partners throughout the entire supply chain, both upstream and downstream

Prohibition of Modern Slavery

INTILION strives to act ethically and with integrity in every business relationship. This includes taking measures to ensure that slavery, forced or compulsory labour, human trafficking, child labour and fraudulent recruitment practices (collectively referred to as “modern slavery”) do not occur within our company or supply chain. Further details are set out in the company’s Compliance Policy, to which reference is made here.

INTILION also expects its business partners to share our commitment to lawful and ethical conduct and to take action to prevent modern slavery within their organisations and supply chains. Taking measures to combat modern slavery is a mandatory prerequisite for entering into business relationships with third parties for the provision of services or the supply of goods. Accordingly, all business partners are expected to observe and comply with the principles set out in the separate Supplier Code of Conduct for suppliers and business partners

Anti-Bribery and Anti-Corruption

All employees are expected to uphold high ethical standards in their daily work and to ensure that our business partners do the same. **INTILION** employees and all persons

acting on **INTILION**’s behalf are therefore prohibited from offering, soliciting or accepting material benefits in their dealings with business partners or public officials in order to secure an unjustified commercial, contractual, regulatory or other advantage for themselves or **INTILION**.

Anyone who fails to comply with the requirements set out in the following sections risks incurring criminal liability for a corruption offence. Even an attempted offence may be punishable.

Accepting Gifts, Payments and Other Benefits

To avoid even the appearance of preferential treatment of individuals or companies with which **INTILION** has a business relationship, **INTILION** employees may not solicit or accept payments, gifts or other benefits from such individuals or companies. This prohibition includes, among other things, commissions, securities or other profit-sharing arrangements, expenses for business or holiday travel, hospitality that goes beyond customary and reasonable sales-related entertainment, and cash gifts of any amount. Employees are required to report any such requests involving the acceptance of payments to their managers within 24 hours.

INTILION expects its business partners to comply with these principles. If a business partner is found to have made payments or provided gifts to **INTILION** employees in breach of this Code, **INTILION** will take appropriate action, in particular by terminating the business relationship with the partner and reporting the violation to the competent authorities.

Exception for Gifts of Nominal Value

This Code does not prohibit non-cash benefits or gifts of nominal value where they are appropriate and customary, such as giveaways or promotional items bearing the **INTILION** name or logo. Gifts of nominal value are permitted if they are worth less than EUR 50 and are given no more

than once per month. In cases of doubt, the Legal & Compliance department must be consulted to assess whether a non-cash benefit or gift is customary and appropriate. The acceptance of cash payments is strictly prohibited.

Sales, Marketing and Competitive Intelligence

We can only build lasting, high-quality relationships with our customers by acting transparently and with integrity. All our marketing and advertising must therefore be factually accurate and truthful. We will conduct all business in compliance with applicable laws and in an ethically responsible manner, including, where applicable, the requirements of the US Foreign Corrupt Practices Act (FCPA).

We must never use illegal or unethical methods to gather competitive intelligence. Stealing protected information, deliberately obtaining trade secrets in breach of confidentiality obligations, or obtaining such information through former or current employees of other companies is prohibited.

Antitrust and Competition Law

Applicable antitrust and competition laws prohibit agreements that interfere with free trade or restrict competition. This prohibition applies to both companies and individuals. It covers not only written agreements but also unwritten or oral arrangements and even informal discussions between competitors about prices or markets.

Individuals or representatives present during such discussions may face sanctions for infringements of competition law even if they do not actively participate. If INTILION employees or representatives become involved in such discussions or meetings with competitors, they must end the discussion and leave the meeting immediately. They must then promptly notify the Management Board and the Legal & Compliance department in writing of what was discussed and precisely what role the INTILION employees or representatives concerned played.

INTILION employees must not engage in direct or indirect discussions with competitors or enter into express or implied agreements with them concerning prices, terms and conditions, customers, markets, suppliers, employment conditions, geographic divisions or other material aspects of the company’s business. Furthermore, INTILION employees must not disclose INTILION sales data to competitors, either directly or indirectly, without the prior written approval of the Management Board and/or the Legal & Compliance department.

Anti-Money Laundering

INTILION is not involved in the illegal sale of products or services and will not engage in such activities in the future. INTILION is committed to preventing the illegal sale of products and services and any associated money laundering. Under no circumstances may INTILION employees engage in activities intended to facilitate the illegal sale of INTILION products or services or to circumvent the measures INTILION has introduced to combat black-market trading.

In most countries, it is a criminal offence to participate in activities that help criminals conceal the proceeds of crime or launder money, including activities involving smuggled goods, tax evasion, breaches of foreign exchange controls or drug trafficking. Unusual requests from business partners, such as requests to transfer money to or from accounts outside the business partner’s home country or involving a third party, may indicate money laundering or an attempted offence. Any suspicion concerning the source of funds must be reported to the Legal & Compliance department.

Product Safety

INTILION is committed to ensuring that all products and services offered meet the highest standards of quality, safety and reliability. This is achieved through strict compliance with applicable laws, technical standards, guidelines and procedures. INTILION’s quality management system is certified to ISO 9001.

Conflict Minerals

In response to serious human rights abuses associated with the mining of certain minerals in the Democratic Republic of the Congo (DRC) and neighbouring countries, the US Securities and Exchange Commission (SEC) adopted rules implementing the reporting and disclosure requirements for conflict minerals — tin, tantalum, tungsten and gold — under the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

INTILION supports the humanitarian objectives of the Dodd-Frank Act. In this context, we note that INTILION products contain lithium-ion batteries. Although the environmental impacts associated with lithium give rise to concerns, lithium is not classified as a conflict mineral. INTILION does not manufacture lithium-ion batteries itself or distribute them through subcontractors. INTILION primarily sources lithium-ion batteries from established, certified battery manufacturers that also supply the automotive industry. Accordingly, INTILION does not purchase materials, parts or components containing conflict minerals.

Financial Integrity

Accounting Policies

INTILION must comply with all laws and rules governing the accurate and complete maintenance of its books and records, including generally accepted principles of proper accounting. Company funds or other assets must not be used for illegal, improper or unethical purposes. INTILION's books and records must be maintained in accordance with generally accepted accounting principles, INTILION's internal policies and applicable national record-keeping requirements. No undisclosed or unrecorded funds or assets may be maintained, and no false or improper entries may be made.

Fraud Prevention

The company is committed to preventing fraud within the organisation and to thoroughly investigating and addressing fraudulent conduct, including imposing appropriate sanctions. INTILION also considers any action intended to secure an economic benefit for an individual or third party, or to misrepresent financial information, company data or other aspects of the company's performance, to constitute fraudulent conduct, even if the misrepresentation does not result in a direct financial gain for the individual concerned or any third party.

Sponsorship

INTILION welcomes and encourages charitable and sponsorship activities by all employees. However, employees responsible for corporate sponsorship should be aware that donations to charities or sponsorship activities may attract public criticism and cause reputational damage. All charitable and/or sponsorship activities require the approval of the Management Board.

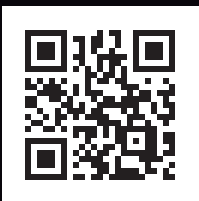
Corporate charitable donations and sponsorships must not be used to influence third parties in their business decisions or to create the appearance of such influence. This must always be avoided. INTILION must therefore disclose all re-

lationships with sponsored institutions or organisations in accordance with applicable ethical standards and accounting policies.

Whistleblowing

If you believe that a breach of the INTILION Code of Conduct or applicable legal requirements has occurred, or if you suspect professional misconduct or other incidents, all such matters should be reported without delay through INTILION's whistleblowing procedure. The established whistleblowing system provides an independent reporting channel through which concerns and suspected violations can also be reported anonymously. Every report will be treated confidentially and investigated promptly. Further information is available on the company intranet under "Whistleblower Reporting Office / Whistleblowing System" ("Hinweisgebermeldestelle / Whistleblowing-System").

INTILION



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All information in this brochure is based on the current state of technology. Our products are subject to continuous development; we therefore reserve the right to make changes. All illustrations are for reference only.