

**H2APEX Group SCA**

# **CODE OF CONDUCT**

**Supply Chain**

# OUR SUPPLY CHAIN

Sustainability is not just a word for us, but a deeply rooted value that permeates every aspect of our business. Our commitment to environmentally friendly energy generation serves as the cornerstone on which our company is built.

But our responsibility goes far beyond the environmental aspects. We believe we have a duty to protect and promote not only the environment, but also fundamental human rights - and not just within our own operating walls, but across our entire supply chain.

Although we are currently not directly covered by the German Supply Chain Act, we fully endorse its goals and intentions. We are proactively implementing systems and processes to meet the requirements set out therein.

Our responsibility extends to a wide range of stakeholders: Employees, customers, suppliers, business partners, applicants, local residents and the general public. We are committed to treating them fairly and with respect. This commitment not only stems from our corporate philosophy but is firmly anchored in our culture. Responsibility does not rest solely with the management level; every employee is called upon to live these values in their daily actions and in their communications - both internal and external.

Our employees are the heart of our company. We trust in their motivation, expertise and strong sense of responsibility. At the same time, we encourage and expect a performance-oriented approach from each individual, characterized by commitment, creative curiosity and a cooperative spirit. Our goal is to always achieve the best for the entire company and its stakeholders in harmonious and professional cooperation.



# LABOR & SOCIAL STANDARDS

In our modern, globalized economy, supply chains play a crucial role. They connect companies worldwide and enable the smooth flow of products and services. At the same time, the complexity of supply chains entails the risk that labor and social standards may not be met in some areas. We recognize the responsibility we bear in this context and are committed to enforcing and promoting the highest labor and social standards not only within our own company but also throughout our supply chain.

In doing so, our actions are always guided by international standards such as the United Nations Universal Declaration of Human Rights, the Guidelines on Child Rights and Business Conduct, the United Nations Guidelines on Business and Human Rights, the International Labor Organization's ("ILO") International Labor Standards and the United Nations Global Compact:

## Abolition of child labor

Children should be able to learn, play and develop. Their safety and well-being are our top priority. Therefore, we ensure that no child labor occurs in our operations or supply chain and work proactively to eliminate such practices.

## Elimination of forced labor

Everyone has the right to freedom and self-determination in their work. We do not tolerate forced or compulsory labor under any circumstances and take all necessary measures to ensure that our employees and those in our supply chain work freely.

## Freedom of association & right to collective bargaining

Every employee has the right to organize and negotiate for better working conditions. This is essential for the protection of employees' interests. We ensure that this right is actively supported and respected by us and our partners, without any reprisals.

## Prohibition of discrimination

Everyone deserves equal opportunities and respect. Our policies and practices promote diversity and inclusion. We work against discrimination of any kind - whether based on gender, age, religion, ethnic origin or other factors.

## Occupational health and safety

A safe workplace is a fundamental right. We are committed to creating the best possible working environment in which risks are minimized. Regular training, safety audits and preventive measures are an integral part of our corporate culture, and we expect the same from our suppliers.

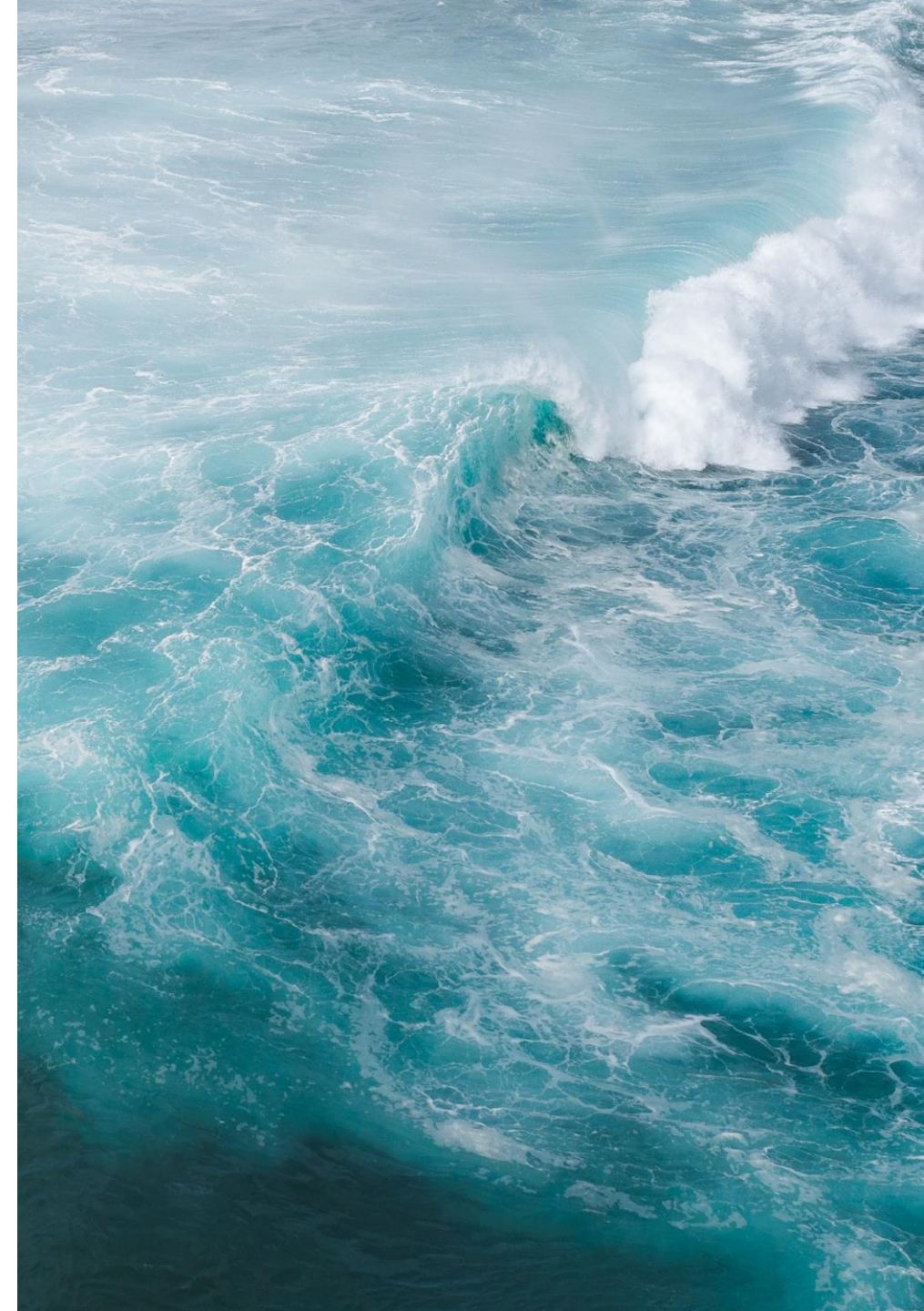


# ENVIRONMENTAL STANDARDS

Our commitment to responsible business goes beyond mere compliance with the law. In light of global challenges, particularly climate change, it is essential that we design our business practices to be sustainable and environmentally friendly. In accordance with the German Supply Chain Act, we are committed to the following standards:

- **Emissions:** We continuously strive to reduce our greenhouse gas emissions and promote the use of renewable energy both in our own operations and with our suppliers.
- **Water use:** Water is a vital resource. We focus on efficient water use and recycling and are committed to preventing pollution of water sources.
- **Waste management:** We minimize the production of waste, promote recycling and ensure responsible disposal to minimize the environmental impact of our operations.
- **Natural resource management:** We emphasize sustainability in the procurement of raw materials and other resources and avoid excessive consumption.
- **Biodiversity:** We ensure that our business practices do not harm natural flora and fauna and promote the conservation of biodiversity.

Commitment to environmental protection is a shared responsibility that we share with all our partners. We are convinced that sustainable business practices not only help protect our planet, but also offer long-term economic benefits.



# FOREIGN TRADE

As a cornerstone of international trade, we attach great importance to fully complying with the legal and regulatory requirements of all countries with which we do business. This not only ensures smooth business operations, but also strengthens the trust of our business partners.

- **Export control:** Before exporting goods and services across borders, we ensure that all necessary permits are obtained, and all relevant regulations are observed. This includes country-specific export regulations as well as international sanctions lists.
- **Customs regulations:** When importing and exporting goods, we focus on strict compliance with customs regulations. This includes the correct classification of goods, accurate and timely declarations, and compliance with all customs procedures and regulations.
- **Transparent documentation:** We document every trade transaction in a transparent and traceable manner. This not only enables us to process goods efficiently and correctly, but also facilitates reviews and audits.
- **Cooperation with authorities:** In the event of ambiguities or inquiries from the authorities, we attach great importance to open and cooperative collaboration. Through proactive dialogue, we strive for a clear and common interpretation of rules and regulations.

We consider it our duty and responsibility to ensure the highest standards in international trade. This serves to protect our company, our employees and our business partners and is an integral part of our corporate ethics.





# RESPONSIBILITY MEANS ACTION

If potential violations of this Code of Conduct, laws or internal policies are noticed, we ask that they be reported to the manager, executive management or the compliance department. If it is uncomfortable to address these issues directly, it is possible to submit the tip anonymously via the [whistleblower system](#).

Every report from a whistleblower will be handled with utmost confidentiality and in strict compliance with all applicable legal provisions. Whistleblowers will not face any adverse consequences or reprisals as a result of their disclosure.

[compliance@apex-energy.de](mailto:compliance@apex-energy.de)

[www.apex-group.de/compliance](http://www.apex-group.de/compliance)

