

Code of Conduct

Sustainability requirements for suppliers

Acting responsibly and lawfully are the basic prerequisites for the success of our company, especially as a supplier of batteries for globally operating car manufacturers. We are committed to compliance with laws and international conventions, to sustainability and responsibility in adhering to social and ethical standards, and to environmentally conscious behaviour. We expect the same behaviour from our suppliers.

The sustainability requirements for suppliers are based on national and international guidelines and conventions such as the principles of the UN Global Compact, the Charter for Sustainable Development of the International Chamber of Commerce, the UN Guiding Principles on Business and Human Rights and the relevant conventions of the International Labour Organization (ILO). Furthermore, our sustainability requirements are based on internal standards and values, our environmental and quality policy as well as the internal MOLL corporate code, which is binding for each of our employees.

Scope of application and applicability

The following sustainability requirements apply to all business relationships between MOLL Batterien GmbH and its suppliers. Furthermore, we expect our suppliers to demand compliance with these requirements in an appropriate form along their supply chain as well.

Ethics

To fulfil social responsibility, suppliers are expected to act ethically and with integrity.

Integrity in business transactions

Suppliers are expected to prohibit, not practice and not tolerate corruption, extortion, embezzlement and breach of trust in any form. Suppliers are expected not to give, offer or accept bribes, kickbacks, improper donations or other improper payments or benefits to or from customers, public officials or other third parties.

It is expected that they will not offer gifts or other benefits for personal gain to MOLL employees.

The business partners shall strictly observe all applicable laws for the import and export of goods and services. In addition, they shall observe sanctions lists as well as the respective applicable legal provisions against money laundering.

Fairness in competition

Suppliers are expected to behave fairly in free competition and respect applicable antitrust laws.

In particular, they shall not enter into any anti-competitive agreements or arrangements and shall not abuse any dominant position that may exist in the market. They shall ensure that there is neither an exchange of competitively sensitive information nor any other conduct that may inadmissibly restrict or limit competition.

Protection of data, intellectual property rights and disclosure of information

Suppliers are expected to use any information appropriately and protect it accordingly. Suppliers shall ensure that data worthy of protection is properly collected, processed, secured and deleted. The business partners shall oblige their employees to maintain business secrets. Confidential content may not be published, passed on to third parties or made available in any other form without authorisation. Any processing of personal data must be carried out in accordance with the respective applicable legal requirements for data protection.

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Creation of notification possibilities about unlawful behaviour

Suppliers are expected to establish communication channels for their employees to report possible unlawful conduct. Suppliers are expected to investigate and, if necessary, take action based on the reports.

Conflict minerals

Suppliers are expected to ensure that no products are supplied to MOLL that contain substances whose source minerals or derivatives originate from a conflict region. This includes suppliers working continuously on transparency upstream in the supply chain to raw material extraction to eliminate any direct or indirect funding or support of armed groups, armed conflict and serious human rights violations including child and forced labour and slavery.

We expect suppliers to avoid using raw materials sourced from smelters and refineries that do not meet the requirements of the OECD Guidance on Due Diligence in the Supply Chain of Mineral Resources from Conflict and High-Risk Areas. Information on smelters and refineries used by the supplier or sub-supplier must be provided in full upon request by MOLL.

Avoidance of conflicts of interest

Suppliers make their decisions solely on the basis of factual criteria and are not influenced by financial or personal interests or relationships.

Financial responsibility

Suppliers are expected to accurately record, review and maintain documentation for all business transactions to demonstrate compliance with corporate financial responsibility requirements and our Compliance Principles. In addition to all financial accounts, quality and controlling reports as well as accounting transactions, this also applies to all other settlements such as expenses, travel costs and event-related incoming and outgoing payments. For each type of transaction, correct, comprehensible and in no way misleading receipts must be created and archived. At least the legal archiving periods apply.

Dealing with counterfeit parts and plagiarism

We expect our suppliers to develop, implement and maintain appropriate methods and processes for their products and services to minimise the risk of introducing plagiarism and counterfeit materials into deliverable products. In addition, the supplier must establish procedures to detect plagiarism and counterfeit materials. If counterfeits are found, the materials must be isolated and the original parts manufacturer or relevant law enforcement agency must be notified. Furthermore, the supplier is expected to ensure that all sales comply with the relevant legal and regulatory requirements and that the products sold are used in accordance with the law.

Export Controls and Economic Sanctions

The supplier shall operate in compliance with the criteria for export controls and in compliance with existing economic sanctions in order to ensure secure trade. Accordingly, the supplier rejects trade outside these regulations.

Human rights and labour rights of employees

Suppliers are expected to respect human rights in their businesses and to treat their employees fairly and with respect.

Avoidance of child and forced labour

We reject child and forced labour in our supply chain. Suppliers are expected to eliminate all forms of child and forced labour in their company and in their supply chain. The definition of child labour is guided by the

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principles of the United Nations Global Compact and the ILO2 (International Labour Organisation) core labour standards. Suppliers must ensure that young workers under the age of 18 do not work overtime or night work and are protected against working conditions that are harmful to their health, safety, morals or development.

Free choice of workplace

Employment relationships are based on voluntariness and can be terminated by employees at their own will and with reasonable notice.

Equal treatment and fairness

It is expected that equal treatment of all employees is an essential principle of the suppliers' corporate policy. Suppliers shall not discriminate against any employees, e.g. on the grounds of ethnic origin, skin colour, gender, religion, nationality, sexual orientation, social origin, age, physical or mental limitations, marital status, pregnancy, trade union membership or political views, provided that these are based on democratic principles and tolerance of dissent. Suppliers must respect the rights of local populations, minorities, indigenous peoples and other vulnerable groups and strive to avoid negative impacts on them. The supplier's recruitment process is ethical, sustainable, transparent and respectful in accordance with legal and regulatory requirements. A detailed procedure is clearly regulated in the corresponding documented information of the supplier.

Employees are selected, hired and promoted based on their qualifications and skills. Suppliers are committed to a working environment that is free from any physical and sexual harassment, as well as physical punishment or torture, mental or physical coercion or verbal abuse, and without threats of such treatment.

Working hours, wages and other benefits

The supplier is expected to ensure that working hours comply with the respective national legal requirements or the minimum standards of the respective national economic sectors. Furthermore, it is expected that the supplier's employees receive fair remuneration that is in line with the applicable national laws. Remuneration and other benefits are expected to provide employees with an adequate standard of living. Suppliers are expected to pay their employees on time.

Freedom of association

In accordance with local laws, suppliers shall respect the right of workers to associate freely, join trade unions, appoint worker representation, form a works council and engage in collective bargaining. Suppliers are expected not to discriminate against employees who engage in worker representation. Where these rights are restricted by local laws, alternative means of worker representation that comply with the law shall be encouraged.

Land, forest, water rights, forced eviction

The supplier is required to avoid forced evictions as well as the deprivation of land, forests and waters when acquiring, developing or otherwise using land, forests and waters. It is expected that all relevant national and international legal and regulatory requirements in this regard will be complied with and implemented.

Health protection, safety, environmental protection and quality

Suppliers are expected to provide a safe and healthy working environment in their companies. They are also expected to act in an ecologically responsible and resource-conserving manner. Suppliers are expected to ensure quality in their business processes.

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Quality requirements and product safety

Suppliers are expected to fulfil the generally recognised as well as the contractually agreed quality requirements. Suppliers are committed to comprehensively ensuring product safety.

Occupational health and safety

Suppliers are expected to adequately protect their employees from any hazards, unnecessarily physically demanding activities in the workplace and risks arising from the use of the infrastructure provided in the workplace.

Suppliers shall provide adequate controls, safe work procedures, preventive maintenance and the necessary technical protective measures to reduce health and safety risks in the workplace. Suitable protective clothing shall be provided free of charge. Safety information on hazardous substances shall be provided to employees for training and protection. Minimum requirements for a safe and healthy working environment include the availability of drinking water, adequate lighting, appropriate room temperature, good ventilation, sanitary facilities and, where appropriate, safe and healthy company accommodation.

Biodiversity, land use and deforestation

The supplier undertakes to comply with all relevant legal and official provisions regarding biodiversity, land use and deforestation in all projects and to check/implement them accordingly in its supply chain. Proof of this can be requested by the customer.

Animal protection

The supplier is obliged to treat living creatures responsibly; this is part of the understanding of values. It is assumed that the supplier complies with all national and international legal standards on animal welfare and animal protection.

Creation and application of environmental management systems

A primary objective of MOLL's corporate policy is environmentally oriented management. MOLL requires all suppliers to install a suitable environmental management system and to strive for certification according to the international standard ISO 14001 at least in the medium term. The requirements from the environmental management system are to be passed on to the supply chain in a suitable form. Suppliers with energy-intensive products are expected to obtain energy management certification according to the international standard ISO 50001 in the medium term.

Dealing with environmental challenges

Suppliers must be aware of their responsibility for the environment and should deal with ecological challenges prudently and with foresight. They must work towards the development of environmentally friendly technologies and place emphasis on renewable energies and recyclable raw materials. Suppliers are expected to continuously improve their environmental performance by setting targets to minimise the resources required and by continuously monitoring environmental performance indicators. Negative impacts on the environment and employee health are to be avoided or minimised in all activities.

This explicitly includes minimising the following environmental aspects:

- CO₂ emission
- Energy consumption - electricity and fuels
- Water consumption and water quality
- Air quality - emission of other pollutants of any kind
- Soil quality
- Chemicals management

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Noise emissions

We expect our suppliers to constantly reduce noise emissions. It must be ensured that neither workers nor local residents can suffer hearing damage. Appropriate precautionary measures must be taken. At a minimum, national and local regulations apply.

Registration, evaluation and restriction of substances and materials

Suppliers are expected to avoid or minimise the use of substances and materials that are hazardous to the environment and health and to provide resources for identifying environmentally friendly, alternative solutions. Suppliers are obliged to register substances in accordance with the legal requirements of the respective markets, to declare them and, if necessary, to have them approved. Material bans must be observed.

Waste and recycling

In the development and manufacture of products, emphasis must be placed on the avoidance of waste, reuse, recycling and the safe, environmentally friendly disposal of residual waste, chemicals and waste water.

Sustainability in the implementation of the requirements

The sustainability of this Code of Conduct is to be permanently ensured by the suppliers. To this end,

- specifications must be integrated into the management systems
- training programmes are to be planned and implemented
- requirements must be consistently passed on to the supply chain
- improvement programmes are to be planned and implemented
- documentation must be kept
- misconduct must be punished

By signing this document, the supplier undertakes to act responsibly and to comply with the principles/requirements listed. The supplier undertakes to communicate the content of this Code of Conduct to employees, delegates and subcontractors in a manner that is comprehensible to them and to take all necessary precautions for the implementation of the requirements.

Reporting options in case of misconduct

In order to protect MOLL Batterien GmbH, its employees and business partners, misconduct must be recognised at an early stage, dealt with and remedied immediately. To this end, we require all suppliers to be attentive and to be prepared to take active action in the event of concrete indications of significant breaches of the rules.

MOLL will process every report in a fair, transparent and confidential manner. In accordance with our internal corporate code, no supplier/business partner will suffer any personal or corporate disadvantage as a result. Suppliers/business partners can decide for themselves whether to report by name or anonymously; the identity will be treated confidentially in any case. Personal data is processed in accordance with the German Data Protection Regulation (DSGVO).

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Worldwide accessibility at all times:

sustainability@moll-batterien.de

Written comments should be sent with the note “Confidential” to:

MOLL Batterien GmbH
- Sustainability -
Angerstraße 50
96231 Bad Staffelstein
Germany
