

MOLL Corporate Code

Principles for the fulfilment of corporate responsibility

1. Taking responsibility and acting lawfully

MOLL as a company takes its social and ecological responsibility consciously and actively. We are clearly committed to the fundamental values of our society and to the 10 principles of the United Nations Global Compact. This applies not only to our employees and our company, but we also want to apply these principles to all business relationships with customers, suppliers and service providers.

The reputation of our company is essentially shaped by the appearance, actions and behaviour of each individual employee. The applicable law forms the binding framework for this. It is therefore essential for all employees to know the legal obligations relevant to their area of responsibility and to work with conviction to comply with them. By complying with the law, every employee is acting in MOLL's corporate interest.

Entrepreneurial success through performance requires fair competition according to the principles of the market economy. Agreements restricting competition with customers, competitors or suppliers of any kind are therefore taboo. This applies not only to prices, but also to the content of offers, terms and conditions, market segments and production programmes, among other things.

That is why we set our prices and business conditions autonomously. Likewise, we keep our business strategy, especially regarding the impact of business activities in other industries or regions or products, secret from our competitors as long as we have not communicated this information publicly.

We also determine our individual sales, product and investment policies without coordinating with or informing competitors.

Fair competition prohibits us:

- (1) from entering into **agreements with competitors on prices**, price components and terms and conditions of business that we apply to customers or suppliers when setting prices.
- (2) from sharing secret, market-relevant information when **exchanging information** with competitors.
- (3) from exchanging market-relevant information or agreeing to restrictive agreements **in contacts with competitors**. We do not participate in "secret circles" or "secret meetings" of competitors which may involve the exchange of market-relevant information or agreements restricting competition. We do not tolerate any actions in our presence that violate antitrust law.
- (4) from entering into agreements with competitors with regard to **other restrictions**. We do not agree with competitors on restrictions of production, sales, innovations or investments.

Product safety is the basis of our comprehensive product responsibility. Through comprehensive quality management, our own development work in the area of product safety and field observations in cooperation with our customers, we constantly check the safety of our products. If necessary, we work closely with the responsible authorities.

2. Workers' rights - freedom of association, remuneration and working time

MOLL's **social standard** of course includes the recognition of employee rights. Every employee is free to participate in employee representatives and trade unions - no employee will suffer disadvantages because of his or her involvement. An actively working works council is a matter of course at MOLL.

We create an environment that opens up personal and professional perspectives for our employees. Therefore, we consciously invest in the qualification of our employees and their working environment. At the same time, we expect every employee to actively contribute and contribute to the company's success with performance and commitment.

Every employee is entitled to fair, performance-related and timely remuneration for his or her work performance. We respect the applicable requirements on the statutory minimum wage and promote equal treatment in terms of remuneration, irrespective of ethnic origin, age, gender, disability and social background.

We observe the minimum age for admission to employment and monitor strict compliance with the maximum permissible daily and weekly working hours in accordance with legal requirements.

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3. Avoidance of conflicts of interest and corruption

Conflicts of interest of our employees, which may arise in the course of their official activities with their private interests as well as those of MOLL, must be avoided.

Each employee is obliged to provide his or her labour to the best of his or her knowledge and ability within the scope of his or her employment and to perform the tasks assigned to him or her. Therefore, any sideline activities that interfere with the fulfilment of this obligation are not permitted. In the event of a risk of conflicts of interest, these are to be discontinued, because dutiful conduct means for every employee to carefully separate private and company interests. The Human Resources Department is available as a contact for all questions on this point.

We encourage and support voluntary work by our employees.

In our business activities, we aim to achieve our competitiveness through quality, innovation and reliability. As a responsible company, MOLL rejects any form of corruption and acceptance of advantages. Therefore, employees of MOLL are prohibited from accepting or demanding, offering or granting personal advantages in connection with their official activities. Decisions or recommendations must not be influenced by private interests and relationships.

This means that the acceptance of material or immaterial benefits or advantages must be avoided from the outset through conscious action. Gifts and benefits to them or related persons which exceed the scope of appropriate and customary business practice are always to be refused.

The same applies to all business relationships with our customers as well as with authorities, elected officials and representatives of interested third parties, e.g. journalists or environmental associations. Gifts, benefits or inappropriate invitations which change or could even change a decision according to factual criteria do not meet our standards and are therefore inadmissible.

Each of our employees is obliged to seek advice and assistance in the event of suspicions or legal doubts regarding the existence of corruption. Our human resources department is available to them for this purpose, which also obtains legal support for decision-making if necessary.

4. Financial Responsibility

To demonstrate compliance with corporate financial responsibility requirements and our Compliance Principles, all business transactions must be accurately recorded, reviewed and the associated documentation maintained. In addition to all financial accounts, quality and controlling reports and accounting transactions, this also applies to all other settlements such as expenses, travel costs and event-related receipts and payments. For each type of transaction, correct, traceable and in no way misleading supporting documents must be created and archived. As a minimum, the statutory archiving periods apply, as well as further stipulations according to the archiving matrix.

Accounting is carried out according to German law in compliance with generally accepted accounting principles and the relevant commercial and tax regulations under the responsibility of the accounting and management departments. The annual financial statements of our company are subject to mandatory auditing by an auditor. We cooperate in principle with the competent supervisory authorities and recognise independent audits (e.g. auditing of the annual financial statements of the GmbH).

5. Data protection

The protection of confidential and personal data is also one of our principles. Therefore, personal data may only be collected, processed and used at MOLL if this is done within the framework of legal regulations and there is a necessity.

Every employee is obliged to comply with the provisions of data protection law and company regulations and to protect data from misuse. An appropriate standard of protection for electronic data storage must be ensured.

We are committed to transparency and grant all employees the right to information as well as justified correction, blocking and deletion of personal data. MOLL's data protection officer supports the management and the human resources department and is available to every employee as a contact person.

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6. Confidentiality and intellectual property

The success of our company is closely linked to the protection of our knowledge and our innovations. Each of our employees is obliged to keep confidential any business and trade secrets that are entrusted to him or become known to him in the course of his work. Whenever data is passed on to third parties, it must be checked whether the recipient is entitled to receive the data.

Compliance with internal company guidelines on data security is mandatory. Any unauthorised interference with data security is prohibited.

We protect our intellectual property and respect the intellectual property of others in the same way. This includes in particular trademarks, patents, copyrights, designs, customer standards and trade secrets of third parties. We respect all related legal regulations.

When cooperating with suppliers, business partners and authorities, it is essential to protect confidential information and respect the intellectual property of others, especially when exchanging information via electronic networks. Technology and know-how transfer must be carried out in such a way that intellectual property rights are protected.

7. Property of the company

Company property should only be used for business purposes. Each employee shares responsibility for the protection and proper use of company property provided to prevent loss, damage, misuse and theft.

The use or removal from the premises for private purposes always requires permission. Valuables must be adequately protected against loss and theft.

8. Dealing with counterfeit parts and plagiarism

We reject any use of plagiarism and counterfeit parts both in our products and in our internal production processes, including spare parts. By products we also mean software and services.

In the area of our product manufacturing, the sampling process based on VDA Volume 2 and processes such as incoming goods inspections, supplier certificates and internal audits have been implemented. Every employee is obliged to report counterfeit parts - even if suspected - to Quality Assurance for blocking and complaint. In severe cases, we notify law enforcement authorities and involve OEM customers informatively.

We confirm to all customers that our products are free from counterfeit parts and meet legal and regulatory requirements.

9. Export controls and economic sanctions

The management as well as the process participants involved in the audit and implementation are committed to strict compliance with applicable export controls and economic sanctions laws. This concerns all identified restrictions on the import and export of sanctioned goods, technologies, software and services. This includes transactions and trade with specific countries, regions, companies and individuals. Internal specifications in this regard are implemented in the instructions for contract review and, in the case of transactions with new customers or suppliers, in the respective risk assessments.

Due to the international nature of our sales network as well as the B2B business with our OEM customers, we include international economic sanctions in our customers' markets in addition to German and European restrictions when assessing existing trade restrictions. In case of doubt, individual economic cooperation is dispensed with because the legal and contractual situation cannot be clearly ascertained.

Furthermore, we commit our business partners and suppliers to cooperate and collaborate in the assessment of and compliance with export controls and economic sanctions. In the event of identified potential risks or detected violations, we actively communicate with competent authorities and affected customers.

10. Mutual respect, non-discrimination and ethics escalation policy

The individuality of each person and the diversity of opinions and cultures is a decisive basis for our success. This requires cooperation that is characterised by appreciation, openness and fairness.

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Therefore, we grant every employee unrestricted equal opportunities and equal treatment, regardless of ethnic origin, age, skin colour, gender, disability, world view, religion, nationality, sexual orientation, social origin or political attitude. We respect the rights of local populations, minorities, indigenous people and other vulnerable groups and strive to avoid negative impacts on them.

Sexual harassment, targeted discrimination, bullying and degradation in any form is prohibited at MOLL. Every executive is a role model with his or her own behaviour and must ensure a working environment free of discrimination and harassment.

As a matter of principle, our employees are selected and promoted on the basis of their qualifications and skills. Our recruitment process is ethical, sustainable, transparent and respectful in accordance with legal and regulatory requirements. A detailed procedure is clearly regulated in corresponding documented information.

No employee will be harmed if he or she draws attention to grievances and/or opportunities for improvement that lie outside his or her reporting line. Every employee has the opportunity to bring these aspects to the attention of the personnel management or the management.

11. Prohibition of forced labour and child labour

No forced labour, slave labour or work comparable to forced labour may be used. All work must be voluntary and workers must be able to leave work or employment at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment.

Child labour must not be used at any stage of production. The age of the workers shall in no case be less than 15 years.

The rights of young workers must be protected and special protection rules observed.

12. Land, forest, water rights, forced eviction

We avoid forced evictions and deprivation of land, forests and water rights when acquiring, developing or otherwise using land, forests and water. All relevant national and international legal and regulatory requirements in this regard are complied with and implemented.

13. Occupational health and safety

We consciously assume our responsibility for the safety and health of our employees. Occupational health and safety based on occupational health and safety regulations is an obligatory task of MOLL and for every individual.

Executives have an important role model function in this respect. They must actively promote the protection of employees' health and carefully instruct their employees. All occupational health and safety measures are free of charge for employees.

To improve the working environment, MOLL establishes processes for the continuous reduction of work-related health hazards and for the improvement of occupational health and safety and fire protection.

The planning and operation of plants must always be geared towards risk identification and risk minimisation with regard to occupational safety and environmental protection in compliance with legal requirements.

14. Environmental protection and awareness

Environmental protection and the careful and sparing use of resources through the continuous improvement of manufacturing processes is an elementary component of the company's goals. This is on an equal footing with other important goals such as economic efficiency and quality policy.

MOLL's sustainability concept therefore includes the conscious assumption of responsibility for the environment. Certified environmental management in accordance with ISO 14001 and certified energy management in accordance with ISO 50001 ensure a systematic approach to natural resources that is characterised by continuous improvement.

As a lead-processing company, we see it as our special responsibility to promote the economical use of energy, water and raw materials and to consider the use of renewable resources in the development and manufacture of products right through to recycling.

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Each of our employees must use resources expediently and sparingly and ensure that there is as little harmful impact as possible on our environment.

15. Dealing with authorities

MOLL strives for a cooperative and transparent relationship with all competent authorities and officials. We attach importance to compliance with legally provided procedures and an open dialogue that promotes trust.

16. Implementation of the corporate code

Every employee of MOLL is obliged to comply with this corporate code and to make its principles the binding standard in the daily performance of tasks.

Every executive is obliged to inform their employees about this corporate code and to sensitise them for strict compliance. They support their employees in the implementation and advise them in conflict situations. They bear the responsibility for appropriate control and actively react to any deviations detected or preventive action against possible violations.

The first contact person for all questions is always the direct supervisor. However, every employee can also contact the HR department directly. For special problems, our legal representation or other specialist advice, e.g. on data protection, occupational health and safety or product safety, is also available to every employee.

MOLL does not accept violations of the law by its employees. Any of our employees who do not behave in accordance with the rules must expect appropriate consequences within the framework of company and legal regulations. Culpable violations of the law by employees may result not only in individual legal action by the state or authorities, but also in sanctions under labour law, up to and including termination of the employment relationship.

17. Reporting options for breaches and protection against reprisals

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

MOLL will process every report in a documented manner using a fair, transparent and confidential procedure. In accordance with our corporate code and in conformity with the German Whistleblower Protection Act (HinSchG), no whistleblower will suffer any disadvantage for a justified report. The German Whistleblower Protection Act (HinSchG) offers comprehensive protection. Whistleblowers can decide for themselves whether to report by name or anonymously; the identity of the whistleblower will be treated as strictly confidential in any case. Personal data is processed in accordance with the German Data Protection Regulation (DSGVO) and the German Whistleblower Protection Act (HinSchG).

Worldwide accessibility for all whistleblowers at all times:

hinweis@moll-batterien.de

Written comments should be sent with the note "Confidential" to:

MOLL Batterien GmbH
- Interne Meldestelle -
Angerstraße 50
96231 Bad Staffelstein
Germany
