

CODE OF CONDUCT

for Vendors, Suppliers
and Business Partners

of Enerox GmbH

The background of the page features a blue-tinted photograph of two people running in a field. On the left, a person is running towards the right. On the right, another person is running towards the left, with their arms raised in a celebratory gesture. The overall scene is bright and energetic, suggesting a positive and active business environment.

cellcube
BUILDING ENERGY STORAGE INFRASTRUCTURE

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1 The company

Enerox GmbH, a company duly incorporated and validly existing under the laws of the Republic of Austria, having its registered office at IZ NOE-Sued Strasse 3, Objekt M36, AT-2355 Wiener Neudorf, Austria, registered at the company register at the regional court Wiener Neustadt under registration no. FN 483106a, is referred to in the following document as “Enerox”.

2 Foreword

Sustainability, reliability, versatility, and enthusiasm are the core values for which the brand “CellCube” by Enerox stands. These values form the foundation for our business success, which for Enerox is directly related to corporate responsibility towards our employees, business partners, society, and the environment. For this reason, Enerox expects all business partners to behave in accordance with, and stand by, the following Code of Conduct.

Compliance with applicable law and responsible behavior are key core elements at Enerox. These practices and behaviors form the basis for our employees', customers', vendors', suppliers', business partners' and society's trust in our company.

Enerox is interested in long-term relationships and long-term partnerships. We strive to involve and encourage all stakeholders in our actions in order to build a community that drives each other forward and operates responsibly at all times. We expect our vendors, suppliers, and business partners to comply with the provisions of this Code and to conduct their activities within the framework of applicable laws.

3 Expectations

Our Code of Conduct includes standards for human rights, labor rights, the environment and anti-corruption for our up- and downstream supply chain. These standards are fundamental to ensure that all humans along the value chain are treated with respect, dignity, and that business is conducted in an environmentally and ethically responsible manner.

It can be expected that the standards set out by Enerox are themselves adhered to and actively lived without exception.

All vendors, suppliers, and business partners are expected to comply with these guidelines, and they must be familiar with the business and subcontractors to ensure that they work within the guidelines established by this Code. Failure to adhere to this code may result in suspension or termination of the business relationship with Enerox.

Enerox will not immediately terminate the business relationship in the event of a violation of this Code, provided that the improvement measures are initiated within a reasonable period. However, if no sufficient improvement of the situation is apparent in the case of repeated violations, Enerox will not continue the business relationship.

4 Social responsibility and human rights

Vendors, suppliers, and business partners agree to respect human rights in accordance with the *United Nations Charta*¹ and the *European Convention on Human Rights*² as well as the standards of the *International Labor Organization (ILO)* concerning core labor³ and minimum wages⁴.

Labor

The use of child or forced labor is prohibited at any stage of the manufacturing process. The term "child" refers to any person under the age of 15, to persons of compulsory school age, or to persons who have not attained the minimum age for employment in the country concerned, whichever is the highest. An appropriate mechanism to verify the age of the workforce must be implemented (verification of age prior to employment).

The use of approved workplace training programs that comply with all laws and regulations is encouraged. Workers under the age of 18 are not allowed to perform hazardous work that could jeopardize their health and safety, including night shifts and overtime.

Should child or forced labor be identified anywhere in the supply chain, immediate reporting to local authorities and Enerox is required.

Welfare

The vendor, supplier, and business partner are required to comply with, at a minimum, their respective national standards for a safe and healthy working environment. In addition, its employees are entitled to, at a minimum, the legal minimum wage as well as the legal remuneration for overtime work. The enforcement of long-term working hours that excessively exceed the maximum legal limit is not acceptable. The employees have the right to fair wage negotiations and to organize themselves in a professional manner without denial from the employer.

Safety and health at work

Enerox operations shall be executed safely for its personnel, contractors, vendors, suppliers, and the communities in which it operates. Safety and Security shall be at any time priority. Any employee of Enerox who notices an unsafe condition that may cause any type of damage is authorized to stop or correct this action, including stopping the equipment or machinery causing this situation.

Suppliers are expected to provide a safe work environment, prevent accidents, and minimize exposure to health risks. A complete commitment to comply with all applicable *OSHA Standards*⁵ in all countries in which they carry out their operations is also expected.

Non-discrimination

Discrimination against employees in any form is not accepted. The principle of non-discrimination requires equal treatment of an individual or group regardless of their personal characteristics, including gender, color, ethnic or social origin, genetic characteristics, language, religion or belief, political or other opinions, membership of a national minority, property, birth, disability, age or sexual orientation.

Human treatment

Vendors, suppliers, and business partners shall provide a workplace free of brutal and/or inhumane treatment, including sexual harassment, sexual abuse, physical reprimands, mental or physical coercion or verbal assaults of workers. This also applies to threats of such treatment.

¹ <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

² https://www.echr.coe.int/documents/convention_eng.pdf

³ C 029, C 087, C 098, C 100, C 105, C 111, C 138, C 182; www.ilo.org

⁴ C131; www.ilo.org

⁵ <https://osha.europa.eu/en/tools-and-resources/oshwiki>

5 Responsibility towards the environment

Enerox recognizes that environmental responsibility is an integral part of producing sustainable world-class products. We strive for constant improvement in any environmental area and do not rest on our achievements. The expectation we have towards our vendors, suppliers, and business partners is the same.

Environmental protection and reduction of resource consumption

Vendors, suppliers, and business partners commit themselves to comply with the respective country-specific environmental laws and not to intentionally cause environmental damage. Enerox seeks to minimize the consumption of natural resources through product design, procurement opportunities and operational conservation and encourages all vendors, suppliers, and business partners to follow this approach.

Prevention of environmental pollution

Vendors and suppliers must strive to reduce or prevent the discharge of pollutants into water, soil, and air through modified and innovative production, maintenance, and manufacturing processes. In addition, the processes used should take into account and consider the conservation of biodiversity and sustainable use of (natural) resources such as energy, water, land, ores, and minerals.

Hazardous materials

Chemicals or other materials that pose a hazard when released into the environment shall be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse, and disposal.

6 Ethical conduct and anti-corruption

Vendors, suppliers, and business partners must always adhere to the highest ethical standards in their dealings with employees, customers, and others along their value chain. The *United Nations Convention against Corruption*⁶ must be complied with at all times.

Commitment to anti-corruption

Any form of corruption, extortion, and embezzlement is not accepted nor tolerated and may lead to the termination of any supply agreement with Enerox. This relates to the promise, offer, authorization, grant, or acceptance of pecuniary benefits, whether directly or indirectly by a third party, for the purpose of: obtaining or maintaining a business, procuring business to any person, or otherwise obtaining an improper advantage. Such benefits include, but are not limited to, commissions, gifts, gratuities, entertainment, transportation, and accommodation. Small gifts of little value that conform to customary cultural and social norms are not covered by this provision.

Furthermore, vendors, suppliers, and business partners agree to cooperate on security matters, for the detection and reporting of any illegal activity which could be detrimental to the levels of protection, including events such as cargo theft, information theft, corrupt practices, smuggling, bribery, damage to reputation, terrorism, and any other incident of a criminal nature, as applicable to the nature of the supply relationship with Enerox.

Disclosure of information

Vendors, suppliers, and business partners are required to disclose, upon request, values and standards specified in this Code, within a timeframe of one month. Falsifications of records as well as misrepresentations of conditions or practices in the supply chain are unacceptable.

⁶ <https://www.unodc.org/unodc/en/corruption/uncac.html>

Upon Enerox's request, the vendors, suppliers, and business partners are obliged to disclose the sources of their critical raw materials⁷, as well as the sources of potential conflict materials: tantalum, tin, tungsten, and gold.

Protection of intellectual property

Intellectual property rights must be respected; technology and know-how transfers must be carried out in such a way that intellectual property rights and customer information are protected. Employees of Enerox cannot establish commercial relationships with contractors, vendors, suppliers, and business partners who do not demonstrate that they are duly authorized to use or market products and services subject to payment of royalties or property rights intellectual or industrial to third parties, as well as authenticity and legality.

Protection of identity and prohibition of retaliation

Vendors, suppliers, and business partners are required to develop programs to protect the confidentiality of company and employee information. They must also prevent retaliation against employees who participate in good faith in such programs or refuse to comply with an order that violates this Code. Suppliers are encouraged to establish an anonymous whistleblower mechanism so that employees have the ability to report workplace abuses, violations, and other unethical behavior.

Security

Enerox and vendors, suppliers, and business partners agree to cooperate on security issues to detect and report illegal activities that may be detrimental to the level of protection, including events such as asset theft, cargo theft, information theft, corruption, smuggling, bribery, defamation of character, terrorism, violation of human rights and any other incidents of a criminal nature.

Conflict of interest

Employees of Enerox are not allowed to act as a vendor or render services for Enerox. Employees owning personal businesses shall refrain from providing Enerox with products and/or services.

All employees, contractors, vendors and suppliers, and business partners of Enerox shall act with honesty and integrity, seeking to protect the best interests of all. Every employee of Enerox shall avoid situations that imply or could imply any conflict of interest. A conflict of interest occurs when an Enerox employee is in a position to derive personal benefit from actions or decisions made in the employee's official capacity. This situation includes and extends to benefits to the employee's family members and related parties.

Responsible sourcing of minerals

Vendors, suppliers, and business partners shall have policies in place to reasonably ensure that minerals are not sourced from conflict and high-risk areas. These conflict materials include tantalum, tin, tungsten, and gold, which may be used in the manufacture of their products. Procurement of these materials must not directly or indirectly fund armed groups that commit or benefit from serious human rights abuses (particularly in the Democratic Republic of Congo and its neighboring countries). Suppliers are required to conduct due diligence on the sources and chain of custody of these minerals and to provide Enerox with their due diligence measures based on the *Responsible Minerals Initiative (RMI)* or equivalent standards upon request.

The supplier declares and undertakes to fully support Enerox's efforts to keep its supply chain free of conflict minerals.

⁷ For the latest European Commission definitions see https://ec.europa.eu/growth/sectors/raw-materials/specific-interest/critical_en

Community involvement

Vendors, suppliers, and business partners are encouraged to engage the local community in which they operate to promote social and economic development. Following the approach: “Giving back to society”.

Data protection

Vendors, suppliers, and business partners are required to ensure the privacy and confidentiality of the personal information of all persons with whom they do business, including customers, consumers, and employees. They agree to comply with their country-specific laws and regulations relating to data protection and information security in all business processes where personal information is collected, stored, processed, transmitted, and shared.

7 Monitoring

Enerox reserves the right to inspect and audit vendors, suppliers, and business partners for compliance with this Code via AI supply chain monitoring tools, surveys and personally by its own employees, representatives of Enerox, or independent organizations during normal business hours and by arrangement.

If subcontracting is permitted within the scope of the cooperation with Enerox, these subcontractors must also implement and comply with all regulations from this Code. It is the responsibility of the vendors, suppliers, and business partners to ensure and monitor this.

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8 Declaration

As a vendor, supplier, or business partner, _____ [the company] we hereby commit to the Code of Conduct of Enerox. We also commit to support the implementation of processes focused on supply chain resilience and security. Furthermore, we commit to the exchange of information about personal references, illicit cargo, and personnel with possible suspicious profiles. We accept as good and valid Enerox's security procedures, which include but are not limited to: Verification of Personal Data Verification, Recognition Visits, Modern Slavery and Human Trafficking Policy, Anti-Bribery and Corruption Policy, money laundering and financing of terrorism and to send applicable information via the registration process as a business and supply partner. We are committed to encourage and support process improvement implementations based on the security criteria set out in international standards for security of Enerox logistics chains.

Title

Full name

Position

Date (dd.mm.yyyy)

Place signed

Supplier / Vendor/ Business partner

SIGNATURE

Enerox GmbH

SIGNATURE

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