



CODE OF CONDUCT

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**OUR RESPONSIBILITY
FOR COMPLIANCE**



Introduction and application of Code of Conduct

Our code of conduct outlines the expectations and standards of behavior for employees within AMPECO. The purpose of the document is to provide clear guidance on what is expected of our employees in terms of their behavior, both within the workplace and in their interactions with customers, partners, and other stakeholders. Our code of conduct is a reflection of our values and principles, and it sets the standard for ethical and responsible behavior within our organization.

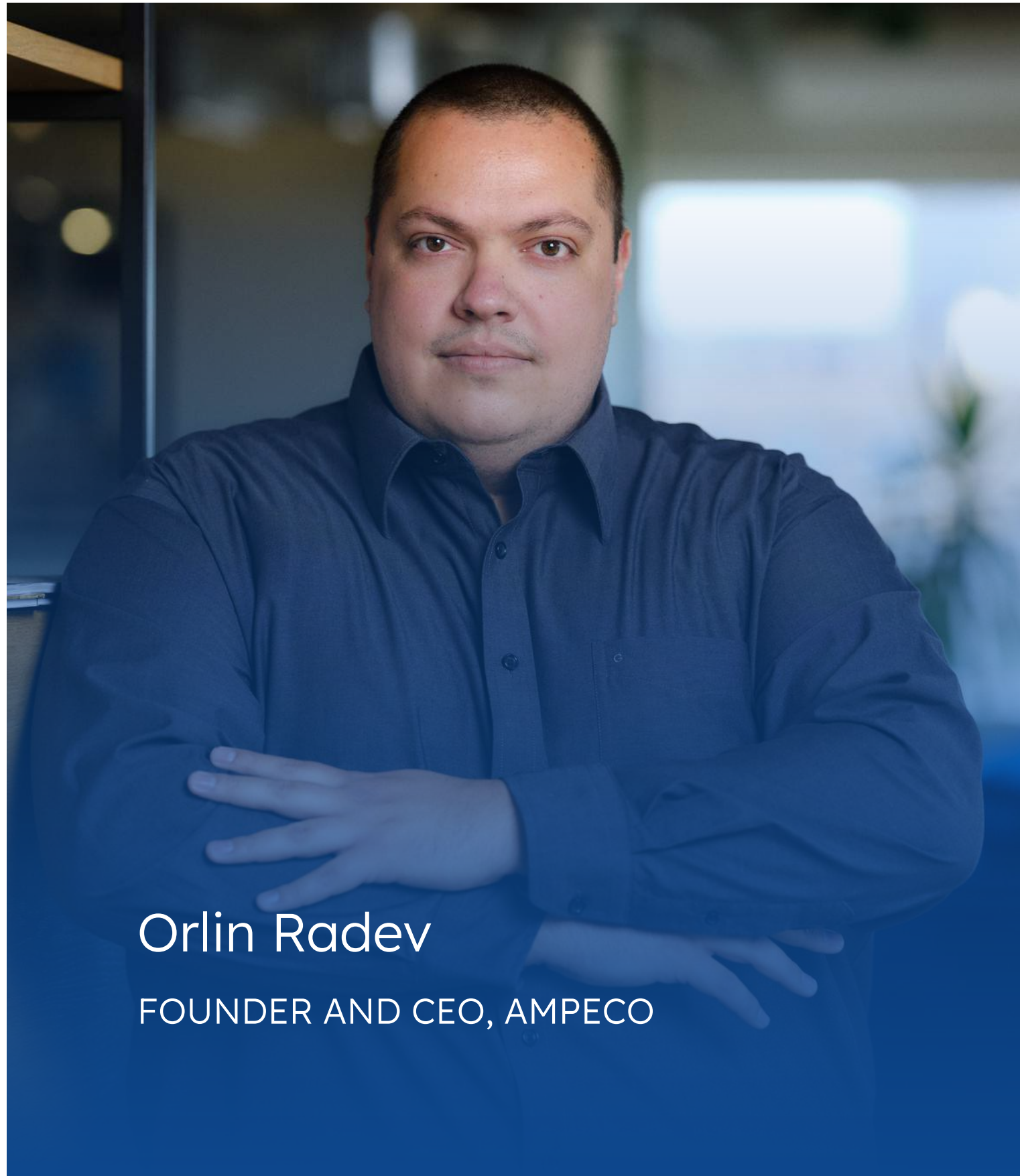
It applies to all employees, regardless of their position or role within the company. We expect all employees to familiarize themselves with the code of conduct and to act in accordance with its principles.

This document is not just a set of rules - it is a reflection of who we are as a company and what we stand for. We believe that by adhering to these principles, we create a culture of trust and respect within our organization, and we will earn the trust and respect of our customers, partners, and other stakeholders.





Message from the CEO



Orlin Radev

FOUNDER AND CEO, AMPECO



At our core, we strive to empower the EV charging providers of tomorrow with innovative technology and build a better and more sustainable future. How we pursue this mission, however, is just as important. As a company, we recognize that our responsibility extends beyond just delivering innovative solutions. We have a duty to act with integrity and honesty towards each other, our customers, society, and the environment.

We take this commitment seriously and hold ourselves accountable through our code of conduct. This code reflects our values and guides us in making ethical decisions that align with our mission.





Values, Mission and Vision

Our company values are the core principles that guide and define our organizational culture, behaviors, and decision-making. They are the set of beliefs and attitudes that shape the way in which we operate, and achieve our goals. We use them as a moral compass, helping to ensure that everyone in the organization is aligned with the same goals and expectations.



We believe it is a marathon, not a sprint (representing Excellence through dedication & hard work);

We embrace openness at all levels (representing Transparency and honesty);

We empower each other on the road to success (representing Teamwork and support);

We are always ready to take the driver's seat (representing Proactiveness and problem-solving);

We continuously charge ourselves with knowledge (representing Learning and knowledge).



OUR RESPONSIBILITY AS A MEMBER OF SOCIETY



Environmental responsibility

AMPECO's strategic goal is to act as an active enabler for the transition to sustainable mobility at a global scale. In doing so, we aim to become a true leader in the sector for tailored solutions for electric vehicle charging infrastructure. We develop a product that empowers businesses to provide a fair and equitable access to charging for all electric vehicle drivers globally.

Our specific commitments towards environmental sustainability are detailed in [AMPECO's Environmental Policy](#).



Furthermore, all employees are expected to become familiar with AMPECO's annual [Sustainability Report](#)



Diversity and inclusion

When it comes to diversity and inclusion in the workplace, it's not just about advancing social justice or creating a more equitable society. It's also about developing a more productive and innovative workforce.



To benefit from a diverse workforce, we need an inclusive work environment in which we respect and appreciate individual differences and embrace the diversity of backgrounds and perspectives of everyone. This includes but is not limited to gender, gender identity, age, religion, sexuality, cultural background, skills, educational background, and personality. Trust is key in any relationship, but especially in the workplace. When employees trust one another, they are more likely to collaborate and cooperate.

AMPECO has established a cross-functional People and Culture Committee which is to meet on a regular basis in order to guarantee employees' perspectives are promptly considered. This group of employees will be actively responsible for promoting and driving the organization's intended culture.



Human rights

Our commitment to human rights reflects our values as a company and our belief in the importance of conducting business in a responsible and ethical manner. We are proud to be a company that upholds and promotes human rights and we will continue to work to ensure that our practices and operations reflect this commitment.

We recognize and respect the fundamental human rights of all individuals. We believe that respect for human rights is essential to our business success and our responsibility to society.

As a global corporation, AMPECO actively embraces its responsibility towards society and the environment in which it operates. To fulfill this commitment, we adhere to international standards and uphold the principles outlined in the UN Global Compact. Moreover, we deeply respect the principles articulated in the Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.





OUR RESPONSIBILITY AS AN EMPLOYER



Health and safety

At AMPECO, we are committed to protecting and maintaining the health and safety of all our employees and customers. We promote healthy lifestyle practices, such as physical activity, healthy eating, and stress management. Employees are obligated to comply with our internal policies and procedures on health and safety, be it at the office or at home. All our employees are expected to apply safe work practices at all times. Employees are required to also immediately report workplace injuries, illnesses or unsafe conditions.

Drugs and alcohol use

The use of drugs and alcohol at work poses a serious risk to employee safety and can lead to negative consequences for both the individual and the organization as a whole. At AMPECO, we care about the health and safety of all our employees. Employees are expected to comply with our internal guidelines on use of alcohol, drugs, and smoking, whether it is in the workplace, at home, or while on business conducts. Employees are not permitted to be under the influence of any illegal or legal drug that impairs the ability to perform their job. Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment.

Anti-harassment/Anti-discrimination

We at AMPECO are dedicated to supporting a diverse and inclusive work environment, and we do not tolerate harassment or discrimination in any form. This does not only apply to our employees, but also extends to all non-AMPECO stakeholders - customers, vendors, suppliers and potential hires. In addition, we do not tolerate any kind of workplace abuse or violence. We value the experiences, differences and capabilities of each individual and we promote equal treatment and opportunities. To report misconduct, follow our internal reporting guidelines.



Freedom of Association and the Right to Collective Bargaining

AMPECO respects the rights expressed in the ILO Declaration on Fundamental Principles and Rights at Work, which includes its employees' right to associate freely, form or join organizations of their choosing and to bargain collectively in full freedom. We also recognise our employees' right to refrain from collective representation. AMPECO is committed to conducting collective bargaining with freely chosen employee representatives of legally recognised trade unions.

Forced and Child Labour

AMPECO will not use any form of forced or involuntary labor, and refrains from practices that can give rise to a risk of involuntary labor. We will comply rigorously with all local laws and regulations. Also, AMPECO will not permit hazardous work or night work for children below the age of 18 years.



Standards of professionalism

Communication: Employees should communicate professionally and effectively with coworkers, supervisors, clients, and other stakeholders. This includes using appropriate language, tone, and demeanor, and being respectful and attentive to others.

Employees should maintain a positive and proactive attitude, showing initiative, enthusiasm, and a willingness to learn and grow in their role.

Employees should act with honesty, integrity, and ethical behavior in all aspects of their work. This includes maintaining confidentiality, avoiding conflicts of interest, and reporting any unethical or illegal behavior.

Employees may not prepare or transmit a document that lacks certain attributes or signatures. Employees do not have the right to withhold documents or information when, by doing so, in any way, they hinder the work of the staff members. The duties of managers at all levels are to transmit the necessary information in compliance with the hierarchical order established within the company.

Employees are expected to comply with the established work ethics that requires accurate, conscientious, qualitative and effective performance of the duties of the employee under the employment relationship.





Use of company assets

AMPECO's tangible and intangible assets are to only be used in accordance with the company's business goals and objectives and should only be used for business purposes. If an employee is unsure about whether a particular use of a company asset is appropriate, they should seek guidance from their manager.

Employees are obliged to preserve and protect the property and equipment entrusted to them.

Employees may not export any type of equipment, documents, data or materials outside the company perimeter, without the approval of their direct manager. This refers to the logical boundaries of the company - MAC PCs and all cloud-based systems we use fall within the company perimeter regardless of the physical location of the user who is accessing the data.

All company assets must be used in compliance with all applicable laws and regulations, including data protection laws and any other legal or regulatory requirements that may apply to specific types of assets or activities.



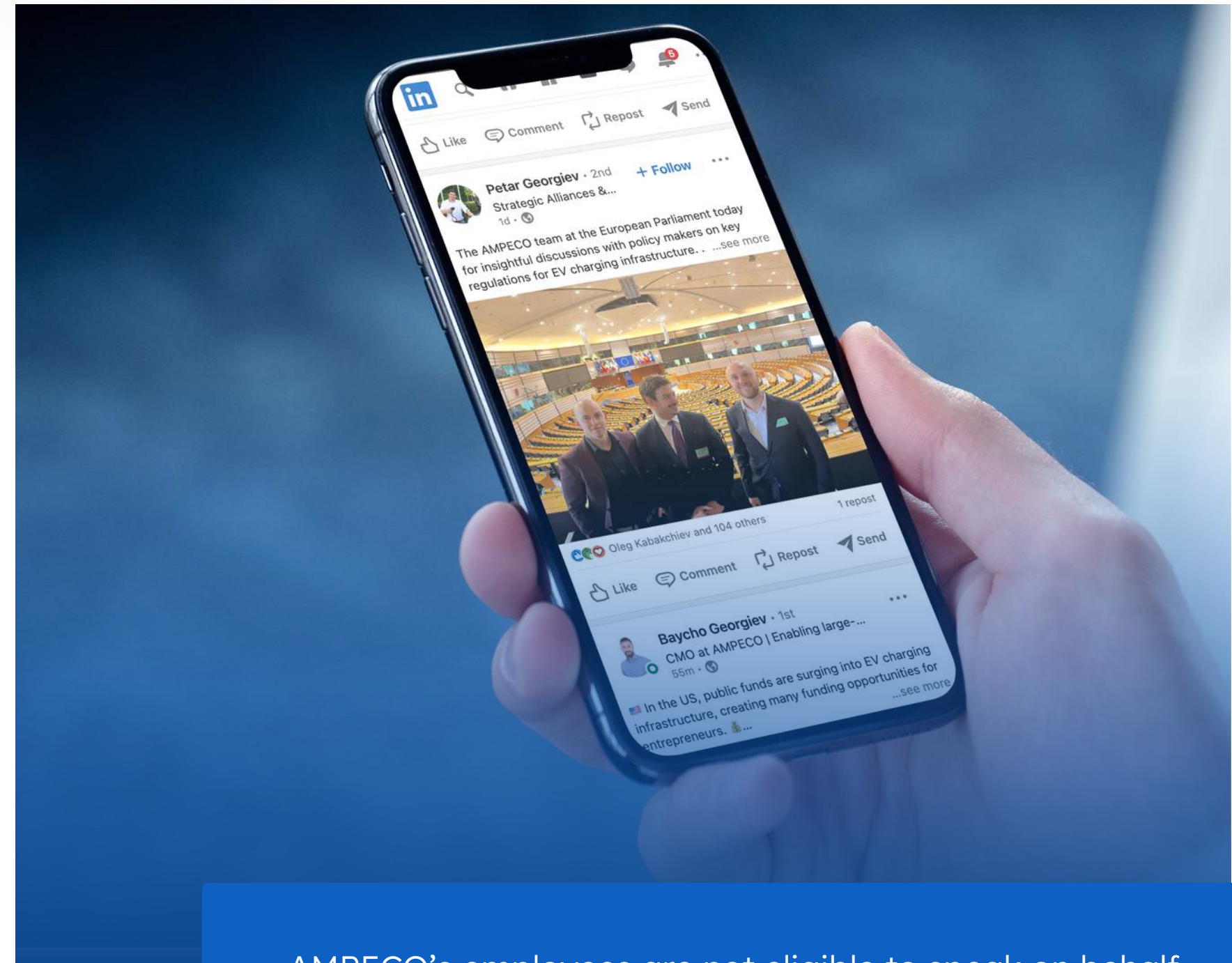
Personal mobile devices fall outside the company perimeter. Use of personal mobile devices should be approved by the manager with the main intention to validate the business need of the employee to access company resources (e.g. e-mail, slack, other tools) outside working hours. Such approval is also required per the Labor code to justify overtime and related expenses.

Use of social media

AMPECO encourages its employees to make the most of the opportunities offered by social media to demonstrate thought leadership, champion our capabilities, humanize our business, and celebrate achievements.

AMPECO applies the same rules of personal behavior online as we do offline. All AMPECO employees must comply with the law, behave ethically, and prioritize information accuracy and security. They should always consider their online behavior reflects both them personally and our business, and their social media posts are permanent.

While AMPECO encourages employees to celebrate its achievements and champion its capabilities, we also trust them not to give away commercially sensitive information and always protect clients, partners, investors, team members, and all the relevant stakeholders' information with confidentiality. We expect our employees to use social media to build relationships and share insights, but, first and foremost, by all means, engage in a healthy debate.



AMPECO's employees are not eligible to speak on behalf of the company unless they are not explicitly authorized to do so. They should always be clear they are expressing their own views and not those of the business.



Communication rules - External & Media Relations

AMPECO employees should use all communication channels responsibly and ensure the content being communicated is business and company culture appropriate, non-confidential, and constructive. As we value our internal transparency, we consider AMPECO's information and content as business-confidential and protected by law. We trust our employees not to share any content that might be perceived as discriminatory, offensive, harassing, threatening, or defamatory.

We consider the AMPECO brand reputation one of our most valuable assets. Therefore, we must promote and protect our brand coherently, consistently, and accurately to maintain AMPECO's strength globally. AMPECO employees should provide accurate information to the public regarding our business. In case of uncertainties, advise the communications function in the marketing department.

If any of our employees are contacted by a member of the media about AMPECO, they should always refer that person to the communications function in the marketing department. It is important that we speak with one voice about the company.



AMPECO employees do not issue any public statements for our company and always refer any requests to the communications function in the marketing department unless they are not already dedicated spokespersons of the company.



OUR RESPONSIBILITY AS A BUSINESS PARTNER



Confidentiality

At our company, we take the protection of confidential information very seriously. We understand that our success depends on our ability to keep certain information confidential, whether it is information about our customers, our products, or our business operations.

As an employee of our company, you will have access to confidential information that is vital to our business. This information may include, but is not limited to, financial information, intellectual property, trade secrets, customer information, and other confidential information.

We expect all employees to maintain the confidentiality of this information and to take all necessary steps to protect it from unauthorized disclosure, both during and after their employment with the company. This obligation to maintain confidentiality applies even after an employee has left the company.

In addition, we expect employees to comply with all applicable laws and regulations governing the protection of confidential information, including data protection laws and any contractual obligations or NDA agreements that may exist with respect to specific types of confidential information. Employees must follow the guidelines defined in the AMPECO ISMS information handling policies and procedures.

Any breach of confidentiality can result in significant harm to the company, including damage to our reputation, loss of competitive advantage, and legal liability. Therefore, we take any breach of confidentiality very seriously and may take appropriate disciplinary action, up to and including termination of employment.

We encourage employees to seek guidance from their manager, our legal department or our information security officer if they have any questions about their obligations with respect to confidential information. We also provide training to employees on the proper handling and protection of confidential information.



Privacy & GDPR

Protecting the privacy and personal data of our customers is of utmost importance to us. As such, we are committed to ensuring that all data processing activities are in compliance with the General Data Protection Regulation (GDPR).



We have implemented appropriate technical and organizational measures to ensure that personal data is processed lawfully, fairly, and transparently. This includes providing individuals with clear and concise information about our data processing activities, obtaining their consent where necessary, and ensuring that their rights under the GDPR are respected.

We only collect personal data that is necessary for the purposes for which it is processed, and we take all reasonable steps to ensure that the data is accurate, complete, and up-to-date. We dispose of personal data in accordance with the GDPR requirements.



(Cyber) Security

At AMPECO, we have implemented an Information Security Management System which is a set of policies, procedures, instructions and technical specifications.

When performing work for AMPECO, all employees must follow the principles and requirements specified in the ISMS. Our ISMS is a live system and all employees may suggest improvements and enhancements in their respective areas of expertise. The Information Security Officer is the point of contact for employees to raise questions, concerns or recommendations in regards to information security and the ISMS.





Conflict of interest program

A conflict of interest arises when an employee's personal interests or relationships interfere with their ability to act in the best interests of the company. This can include financial interests, relationships with competitors or vendors, or personal relationships that could impact their decision-making. Employees should avoid any types of events that could resonate in a conflict, affecting the business.

Employees who are or think that possibly might be at conflict of interest can self-report their considerations. In no cases the company will require disclosing any personal information, or private data but only the subject of the possible conflict of interest. This may result in the implementation of additional safeguards or restrictions on an employee's activities. If no particular action is taken by direct manager and/or the HR team, report should be escalated to the higher management for a final resolution.

Intellectual property policies

All employees, business partners, suppliers and third parties are required to observe intellectual property rights when performing activities related to AMPECO's business. In particular, special attention should be paid when using images, texts, audio content and other materials.



Bribery and Corruption

At AMPECO we do not tolerate corruption in connection with any of our business dealings. Corruption can take many forms, but most often it occurs through bribery. A bribe is offering or giving anything of value, including cash, cash equivalents such as gift cards, gifts, meals, travel and entertainment, to any person for the purpose of obtaining or retaining business, or securing an improper advantage. An AMPECO employee cannot offer or receive bribes from any individual, regardless of whether that individual is a public official or a private party. Kickbacks are a type of bribery, and occur when a person is offered money or something of value in exchange for providing something, such as information, a discount or a favor, to a third party. Kickbacks are not permissible and are strictly prohibited by AMPECO.

We recognize that corruption not only undermines the integrity of our company, but also harms our employees, customers, partners, and the wider community.

Money Laundering

Money laundering occurs when individuals or organizations try to conceal illicit funds or make those funds look legitimate. Money laundering is illegal and strictly prohibited by AMPECO. In certain countries, we are required to report suspicious activity.



Accounting practices

All business transactions with clients must be fully and accurately recorded in each company's books and records, in accordance with the appropriate procedures. Falsification or misleading entries, unrecorded funds or assets or payments without the appropriate supporting documentation and approval are strictly prohibited.



Fair competition

At AMPECO, we work fairly and passionately. We compete based on the merits of our products and services and avoid any conduct that could restrict fair trade. Countries around the world have antitrust and competition laws, and violations can result in significant legal consequences for AMPECO and potentially individual employees. Employees must be sure to understand and follow the antitrust and competition laws in the countries where we operate. Bid rigging happens when competitors manipulate bidding to limit competition. It can include comparing bids, agreeing not to bid, or agreeing on who will submit the winning bid. If an AMPECO employee is involved in the bid preparation process, they must comply with the law and our policies.

When speaking with customers — whether in-person or through our advertising, marketing, or sales materials — we provide only truthful information about our products. We do not make false or illegal claims about our competitors and never use deception or misrepresentation to gain an unfair advantage over them.



Whistleblower policy

As a company, we are dedicated to maintaining the highest standards of ethics, integrity, and compliance with all applicable laws and regulations. We recognize that, in some instances, employees may become aware of practices that do not meet these high standards.

We encourage our employees to speak up and report any concerns they may have regarding potential violations of the law, company policies, or ethical standards. We have established [a Whistleblower Policy](#) that provides clear guidance and protection for employees who report such concerns.

We take all reports of potential wrongdoing seriously, and we have established procedures to ensure that whistleblowers are protected from retaliation. Any employee who makes a good faith report of potential wrongdoing will not be subject to retaliation or adverse employment actions, and we will take appropriate steps to ensure that they are protected from retaliation by others.

Reports of potential wrongdoing may be made anonymously, and all reports will be thoroughly investigated. Where appropriate, we will take corrective action to address any wrongdoing that is uncovered.





Disciplinary Measures

If there is a violation of the Code, Ampeco will take appropriate measures in accordance with the procedures and policies in place with the employee, subcontractor, consultant or supplier concerned. As the case may be, appropriate measures with possible legal actions to preserve Ampeco's interests will be taken

Raising concerns & reporting integrity issues

All employees and directors should promote ethical behavior and should encourage colleagues to talk to their managers or Legal Counsel when in doubt about the best course of action in a particular situation. Violation of laws, rules, regulations or this Code should be reported to the Legal Counsel without delay. The report will be treated confidentially and the identity of the person making the report will not be disclosed.



Acknowledgement of the Code of Conduct

As a valued member of our organization, it is important that you understand and agree to uphold our Code of Conduct. Our Code of Conduct sets out the standards of behavior that we expect from all of our employees, and it reflects our commitment to conducting business with integrity, respect, and professionalism.



By signing this document, you also understand that our obligation to uphold the Code of Conduct is an ongoing process, and that we will regularly update the document to reflect changes in the law or our business practices. We will provide you with notice of any material changes to the Code of Conduct and you will be required to acknowledge and agree to any updated version of the Code. You also agree to comply with the Code of Conduct and to report any suspected violations of the Code that you become aware of.



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