

Supplier Code of Conduct STABL Energy

1. Introduction

This Supplier Code of Conduct (the “Code”) of STABL Energy (“STABL”) is designed to help us achieve our mission, vision, and values, as well as to comply with the laws and regulations that govern our business. The Code presents the guidelines and definitions of what we perceive as “good corporate behaviour”, and it is expected that our suppliers adhere to them with equal commitment.

The Code is based on international standards and best practices. STABL is committed to aligning practices with the OECD Guidelines for Multination Enterprises, the UN Guiding Principles on Businesses and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. Further, STABL is also committed to monitoring compliance with the UN Global Compact principles.

We expect our suppliers to align their activities with the same guidelines and recommendations.

Scope

This Code applies to all suppliers, vendors, contractors, subcontractors, agents, consultants, and their respective affiliates, who have been commissioned to provide goods and/or services for STABL (hereafter referred to collectively as “suppliers”).

The requirements of this Code may be in addition to the requirements set out in any agreement or other set of terms and conditions that apply to a suppliers’ relationship with STABL. If any discrepancy or conflict arises between the terms of this Code and national laws, suppliers are expected to follow whichever standard is more rigorous and immediately inform STABL if they are unable to comply.

Compliance with this Code

It is the responsibility of our suppliers to ensure this Code is integrated and complied with. Employees of suppliers, who are key for the relationship and in ensuring compliance with the contract with STABL, are required to be familiar with this Code and adhere to its terms. Depending on the circumstances, STABL may take a range of actions to remediate failure to comply with this Code, for example by suspending business undertakings until corrective measures have been implemented. In cases of continuous failure to comply with the Code, STABL assumes the right to terminate contracts.

How to report a concern

Anyone who, in good faith, is in doubt about compliance with or suspects a violation of the Code, should report it through our established contact forms. This can be accessed from our website.

Reporting through our website may be submitted anonymously. STABL must take any reporting on non-compliance with the Code seriously, regardless of its content and means of submission. Hence, we will take appropriate actions to follow up on any submitted reports.

We do not accept retaliatory action, whether by direct or indirect doing or omission, against anyone who, in good faith, reports concerns or violations of the Code. Furthermore, we do not accept retaliatory action against anyone who, in good faith, cooperates in an investigation of such a concern or violation reported by someone else.

2. Safe and Responsible Behaviour

Health and safety

STABL is committed to providing a healthy and safe working environment to every employee.

We believe all injuries and hazards can be prevented. Our ambition is to have zero accidents at our workplaces.

This commitment extends to employees engaged in STABL-related operations and we therefore expect our suppliers to equally ensure the physical integrity of their employees.

Environmental Responsibility

We expect our suppliers to meet or exceed applicable environmental laws, and to be committed to minimizing the impact of their operations on the environment.

Suppliers should also seek to regularly evaluate and monitor the impact of their business activities on the environment, manage and reduce the use of energy and other resources, minimise waste and emissions, recycle materials at every stage of the product life cycle, store hazardous and combustible materials in a safe and legal manner, and reduce environmental impact through design and innovation.

Human rights and labour standards

STABL is committed to the protection of human rights and labour standards as defined in the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, ILO's Fundamental Conventions and the ILO Declaration on Fundamental Principles and Rights at work and we demand the same commitment from our suppliers.

Our suppliers must therefore follow local laws on minimum wages, benefits, and working conditions. We require that suppliers ensure working hours fall within the limits set by law or by applicable collective agreements and that the maximum working week recommended by ILO of 48 hours is not exceeded.

Our suppliers are never permitted to use forced or compulsory labour. Suppliers are also prohibited from using underage labour, as defined by local labour law, unless it is part of a government-approved training or apprenticeship program that clearly benefits the participants.

Suppliers should also respect employee freedom of association and choice with respect to the issue of unions or works council affiliation, consistent with local laws. Our suppliers must not discriminate against members of employee organisations or trade unions.

We expect our suppliers to promote equal opportunities and treatment of employees, irrespective of race, gender, sexual orientation, religion, nationality or other protected characteristics.

3. Integrity in business operations

Suppliers must always act with integrity by complying with all applicable laws and regulations, and by complying with STABL's requirements as set out in contracts and in policies that apply to them, wherever they do business.

Anti-corruption and bribery

We do not tolerate bribery or corruption under any circumstances.

Suppliers must follow all applicable laws that prohibit the giving of anything of value to any person or entity to obtain an improper business advantage, as well as laws that require keeping accurate books and records. Suppliers must follow

anti-corruption and anti-bribery laws in all cases and must be particularly cautious when interacting with government officials.

STABL strictly prohibits suppliers from giving or accepting bribes or making facilitation payments.

Gift and entertainment

Any gift or entertainment offered to a STABL employee to induce or unduly influence a business decision (e.g. awarding business to the supplier, offering favourable terms) is strictly prohibited. If suppliers wish to provide a STABL employee with a gift or entertainment, it must be reasonable, given only occasionally, and of modest value.

In turn, we prohibit STABL employees from soliciting gifts and entertainment from suppliers. If a supplier is solicited by a STABL employee for a gift or entertainment, this should be reported promptly.

Antitrust and competition law

STABL competes fairly and supports free and fair competition.

Suppliers must comply with all applicable antitrust and competition laws and cannot engage in any act that improperly reduces competition. Examples of such prohibited acts include agreeing with competitors to fix prices, set discounts or terms of sale, limit production, divide markets, allocate customers, coordinate bidding activities, boycott customers and suppliers, fix employee compensation, or refrain from hiring each other's employees.

Complying with sanctions and trade embargos

Suppliers must comply with all applicable export control laws, as well as laws that prohibit or restrict business relationships with sanctioned countries, entities, persons, or industry sectors.

Sourcing materials from areas of conflict

Suppliers shall not source minerals and metals that contribute to ongoing conflicts. Therefore, we expect that suppliers exercise due diligence on the source and chain of custody of conflict minerals and metals in their supply chain, and report accordingly to legal requirements.

Data protection and privacy

Data ethics and respect is every individual's fundamental right to the protection of personal data.

We expect suppliers to protect the data privacy of their employees and suppliers when collecting and processing personal data, including information regarding STABL's employees. Suppliers shall adhere to all applicable data privacy laws when collecting, storing, using, processing, and sharing personal data.

Protection of information and intellectual property

We expect our suppliers to act with due care to protect STABL's information and data. We believe our suppliers to be key agents in securing and safeguarding against digital threats.

Suppliers may be given access to intellectual property or confidential or personal information ("Information"). We require that suppliers maintain and enforce appropriate safety and physical security procedures with respect to the access and maintenance of such Information. Such procedures, should at minimum:

- be aligned with industry standards for such types of Information; and
- provide reasonable and appropriate technical and organizational safeguards against accidental or unlawful destruction, loss, alteration, or unauthorized disclosure or access of Information.

These procedures also apply in the face of cybersecurity events or threats.

Suppliers should always act truthfully in their management of information and intellectual property and provide complete and accurate information to STABL.

Additionally, suppliers shall never sell such Information, never disclose it without STABL’s consent and ensure that Information is only used for purposes of the provision of products and/or services to STABL. Information shall be promptly returned or destroyed at the end of a business relationship (or when it is no longer needed).

STABL expects to be notified in cases of violations of intellectual property rights, or if confidential or personal information of STABL, its employees, or business partners are disclosed.

Conflict of interest

We avoid any actual or potential conflicts of interest that may interfere with our ability to perform our duties or to act in the best interests of STABL. A conflict of interest occurs when our personal, financial, or other interests or relationships influence or appear to influence our judgment or actions.

To ensure that relationships with our business partners are based on integrity and sound business judgment, we require our employees to promptly disclose conflicts of interest. Similarly, we expect any supplier to inform us promptly if it has a family or close personal relationship with a STABL employee or an employee of any supplier hired by STABL.

Integrity with good communication

We expect that suppliers of STABL uphold the values of honesty and integrity embedded in this Code. In particular, we note that violating certain elements of this Code is a violation of the law in the jurisdictions in which we operate. STABL does not tolerate any violations of the law by its suppliers.

4. Implementation of this Code

The adoption and implementation of this Code is the responsibility of the Board of Directors of STABL.

The Board of Directors is responsible for maintaining and updating this Code as required by changes to market practice, regulation, voluntary standards or as otherwise deemed necessary.

The management team of STABL is responsible for its implementation in daily operations.

Conflict with other requirements

In the event that any requirement in this document conflicts with other requirements of STABL’s suppliers (e.g. under any agreement in place between a supplier and STABL), the requirements of this document shall prevail.

Version

Edition	Date	Amendment
1	December 2023	Original