

Code of Conduct

This Code of Conduct defines the basic requirements placed on THE CUPOWER GROUP concerning their responsibilities towards their stakeholders, affected groups, and the environment.

The company declares herewith:

1. Legal compliance

- To comply with the laws of the applicable legal system(s)

2. Management systems

- To set up and continuously improve appropriate management processes to prevent, identify, mitigate, and if necessary remediate negative social, ecological, health, and safety-related impacts on workers and communities
- To establish an effective grievance procedure to ensure that any worker, acting individually or with other workers, can submit a grievance without suffering prejudice or retaliation of any kind

3. Prohibition of corruption and bribery

- To tolerate no form of, and not engage in any form of corruption or bribery, be it by employees, third parties, or agents
- Including any payment or other form of benefit conferred on any government official for the purpose of influencing decision-making in violation of the law

4. Respect for basic human Rights of all workers

- To employ no workers under the age of 15 or, in countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14
- Ensure the health and safety of young workers, precluding them from hazardous and night work
- Not to engage in or tolerate any form of modern slavery, forced labor, and human trafficking
- To ensure no worker is subject to unethical recruitment practices

- Promote equal opportunities and treatment for all employees irrespective of characteristics such as skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex, or age
- Respect the personal dignity, privacy, and rights of each individual
- Prohibit behavior including gestures, language, and physical contact that is sexual, coercive, threatening, abusive, or exploitative
- Provide fair remuneration and guarantee at least the applicable national statutory minimum wage
- Comply with the maximum number of working hours laid down in the applicable laws
- Recognize, as far as legally possible, the right of free association and collective bargaining of employees and to neither favor nor discriminate against members of employee organizations or trade unions

5. Health and safety of workers & environmental protection

- Take responsibility for the health and safety of all workers
- Control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases
- Provide training and ensure all workers are educated in health and safety issues
- Act in accordance with applicable statutory and international standards regarding environmental protection including hazardous substances and wastewater management
- Minimize environmental pollution and make continuous improvements in environmental protection

6. Supply chain

- Use reasonable efforts to address social and environmental risks in their own supply chain
- Make reasonable efforts to ensure their companies adhere to requirements comparable to those stipulated herein

Code of Conduct – Conflict Minerals Supplement June 2022

This Conflict Minerals Supplement (hereinafter "CMS") is an integral part of the Code of Conduct for CUPOWER companies concerning their responsibilities with respect to a conflict-free sourcing of "Conflict Minerals" in order to effectively ensure that the use and sale of Conflict Minerals by CUPOWER's companies do not contribute to the ongoing conflict in the Democratic Republic of Congo ("DRC") and adjoining countries.

Definitions:

- Conflict Minerals means columbite-tantalite (coltan), cassiterite, gold, wolframite, cobalt, or their derivatives
- Covered Countries include the DRC and any country sharing an internationally recognized border with the DRC
- DRC Conflict Free means Goods that do not contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries
- Final Rule refers to the implementation rule by the U.S. Securities and Exchange Commission relating to the use of Conflict Minerals

The company declares herewith:

- To be fully committed to ensuring that its use and sale of Conflict Minerals do not contribute to ongoing conflict in the Covered Countries
- Perform a reasonable country of origin inquiry throughout its entire supply chain
- Participate in an established supply chain communication process, such as the Responsible Minerals Initiative (RMI) of the Responsible Business Alliance
- Not to supply any Goods to customers that are not DRC Conflict Free
- To provide relevant data regarding the occurrence of Conflict Minerals in its Goods, using the latest version of the Conflict Minerals Reporting Template (CRMT) of the RMI within three weeks upon customer's request
- To immediately notify customers in writing if any warning signs in its supply chain indicate the representation of DRC Conflict Free might be no longer valid
- To use best efforts to promote compliance with the representations of this CMS among its companies