

# Alterric Code of Conduct

Our guide to  
value-driven  
conduct.



## Dear colleagues at Alterric,

the founding of Alterric in 2021 was accompanied by a great mission: the consistent expansion of renewable energies in Germany and Europe, as well as tangible support in achieving national and international climate targets.

The company and its employees are 100 per cent committed to this mission. Today, we are a dynamically growing company that is ambitiously driving forward the energy transition. Part of our success lies in our openness – not only to new technologies, ideas and solutions, but also to cultural, religious and regional diversity. Above all, however, we have agreed on five corporate values – responsibility, ambition, passion, entrepreneurship and empathy – which we live by internally and externally and which help to ensure that we follow our path with as much determination as commitment.

This Code of Conduct complements our mission and values by providing a guideline for action that is both value-oriented and legally compliant. In addition to human and ethical consistency, it is also important that all employees strictly comply with the applicable laws and regulations: In this way, we jointly avert legal and economic risks from the company and contribute to the lasting success and existence of Alterric.



Nevertheless, we hope that the requirements of this code will not be perceived as a restriction, but rather as an aid for daily actions. After all, the success of our company and the trust of Alterric's partners and customers depend on all of us making coherent and reflective decisions every day. Our integrity and our ability to decide responsibly – especially in challenging situations – is a foundation for the fulfilment of our Alterric mission.

The management has developed and adopted this Code of Conduct together with the executives. It is binding for the entire Alterric Group and all employees. The drafters have a special role to play: the management and the management circle are the first to be measured against the standards described here. They are particularly responsible for ensuring that the Code of Conduct is fully understood, that it is adhered to and that its standards are also represented to partners and customers.

Ultimately, however, it is up to each individual employee to consciously and actively support the Code of Conduct as well as our corporate values. Therefore, if you have any questions about the Code of Conduct or uncertainties regarding its application or the observance of legal provisions, please contact us as management, your manager or the staff of the Governance, Risk & Compliance support function at any time.

**The management  
of Alterric GmbH**

# Content

## 01

### Responsibility towards people and the environment

- 01.1 Human rights – 8
- 01.2 Health, safety and security – 9
- 01.3 Environmental protection and sustainability – 11

## 02

### Developing sustainable relationships

- 02.1 Fair competition – 14
- 02.2 Avoidance of conflicts of interest – 15
- 02.3 Integrity in business transactions – 16
- 02.4 Anti-money laundering – 16
- 02.5 Dealing with authorities, public officials and political parties – 18
- 02.6 Invitations and gifts – 19
- 02.7 Donations and sponsoring – 21

## 03

### Protection of assets and information

- 03.1 Protection of company property – 24
- 03.2 Data protection – 25
- 03.3 Trade and business secrets – 26

Notice of violations – 28

The Code of Conduct to go – 30



01

**Responsibility  
towards people and  
the environment**



## 01.1 Human rights

Alterric and its staff are committed to the freedom and equality of all people without distinction of colour, sex, language, religion, sexual identity, political or other opinion, national or social origin, birth or other status.

Diversity is an essential part of our daily business and our corporate culture. And it is an essential foundation for our ability to develop new, innovative solutions.

We expect all our employees to respect the dignity, privacy and personal rights of every individual at all times. Under no circumstances do we tolerate discrimination, bullying or insults.



## 01.2 Health, safety and security

The health, integrity and performance of our employees is our top priority. Health protection and occupational safety are an integral part of our processes and are included in all social, economic and technical considerations from the very beginning. Managers are obliged to instruct and support their employees in the fulfilment of this responsibility and to regularly monitor its implementation and compliance.

The health and well-being of our employees are the basis for the success and performance of our company. Therefore, it is our highest goal to protect them and to support them with our range of health promotion measures in taking care of their own health.

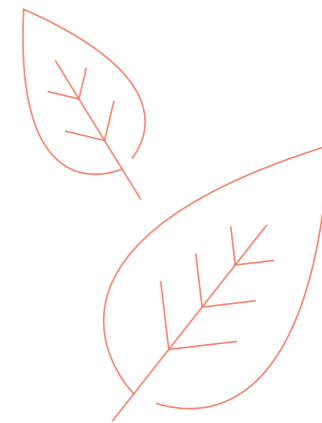
Job satisfaction and motivation are high when everyone is enabled to cope well with their job demands and when disruptions due to absenteeism and the resulting uneven distribution of workloads are minimised.

In order to work safely at Alterric, we use the instrument of risk assessment in addition to the internal guidelines of this Code. Safety-compliant action and mutual attention minimise the risk of accidents. The ultimate goal is to avoid serious or even fatal accidents. In addition to the use of technically safe equipment, this requires in particular exemplary, safe behaviour. Safety-compliant work is also obligatory for our contractors.

Employees use the work equipment and personal protective equipment provided as intended and in accordance with the applicable instructions. Incidents and situations that endanger safety must be stopped immediately and reported to the responsible manager. Our safety specialists support the company and the employees in complying with the requirements regarding occupational safety.



respect for a natural  
environment worth  
preserving and protecting



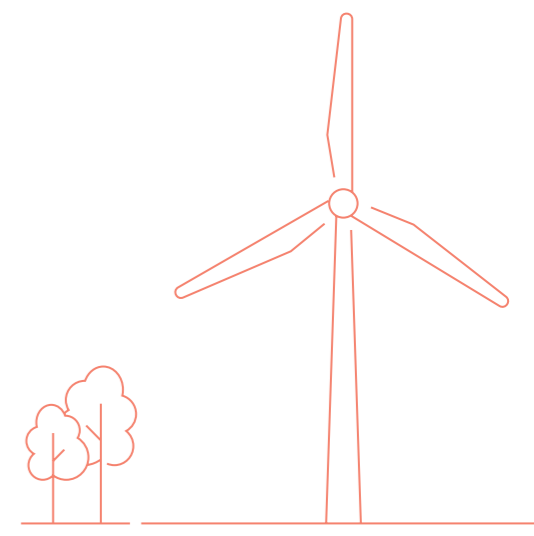
01.3

## Environmental protection and sustainability

Our corporate goal, the expansion of renewable energies, and the protection of the environment cannot be thought of separately. That is why Alterric is committed to protecting the environment and bases its active actions on this. We are convinced that only entrepreneurial action that takes ecological and social developments into account will lead to economic success in the long term.

Our respect for a natural environment worth preserving and protecting is an inseparable part of every corporate decision and action. This includes compliance with environmental protection laws and regulations.

In addition, we support a further commitment of our employees in the area of environmental protection and nature conservation. Such a commitment also serves to preserve our livelihood and thus the existence of our company.





# 02

**Developing  
sustainable  
relationships**



## 02.1

# Fair competition

We are fully committed to the principles of the market economy and fair competition. Our relationships with business partners are based on correctness, honesty and fairness. We pursue our corporate goals exclusively according to the performance principle and in compliance with the applicable competition rules.

This includes the applicable antitrust and trade laws and the corresponding laws on price maintenance, competition law and consumer protection. We also expect this from our competitors and business partners. We are aware that violations can lead to drastic consequences and can be correctly punished by the authorities with high fines, sales levies, exclusions from contracts and more.

In particular, agreements with competitors and concerted practices which have as their object or effect the prevention or restriction of competition are prohibited, for example agreements on prices, offers, production or sales quotas, as well as agreements on the allocation of customers, territories or markets.

Not only formal agreements are prohibited, but also concerted behaviour, for example through informal discussions or informal gentlemen's agreements. Even the mere appearance of a violation is to be avoided.



## 02.2

# Avoidance of conflicts of interest

Alterric welcomes the social commitment of its employees, for example in youth work, politics, adult education, sports, charitable and cultural activities. However, all employees must ensure that their personal interests do not come into conflict with the company's interests.

All employees are required to avoid foreseeable conflicts between the company's interests and private interests. Should conflict situations or uncertainties nevertheless arise, it is important that they are addressed immediately and resolved constructively with the responsible manager or with the involvement of the compliance department without harm to Alterric. This does not only apply to existing conflicts, but also to those that are already on the horizon.







## 02.3

# Integrity in business transactions

We owe our success to our high-quality solutions and services. Without exception, we reject business that comes about through unfair business practices.

Alterric does not tolerate corruption. This means that we do not offer, promise or accept any inducements, favours, benefits or other advantages that are intended to influence a business decision or could even give the appearance of doing so. Our business partners must also live up to this standard.

The issue of corruption has many facets and is difficult to delineate. The following sections provide an overview of possible cases of conflict. This is not a conclusive collection. To avoid uncertainties, employees receive regular training. In addition, the responsible compliance officer and the legal department will help with any questions.

## 02.4

# Anti-money laundering

Money laundering is a serious criminal offence. Alterric therefore takes all necessary and appropriate measures to combat any form of money laundering.

Money laundering is the introduction of illegally acquired money or assets into the legal financial and economic cycle. It is in our interest to ensure that Alterric is not misused in any form for money laundering or other illegal purposes.

Therefore, only business relationships with reputable customers, investors and business partners are acceptable to us. The establishment of a business relationship and all payments and transactions that could be related to money laundering must be prevented. This requires the attention of all employees and compliance with all applicable legal and internal requirements. If there is any doubt or uncertainty about a transaction, it is important that the appropriate manager and Governance, Risk & Compliance are contacted immediately.

Honest and  
trustworthy  
business.



## 02.5

# Dealing with authorities, public officials and political parties

Alterric sees itself as a partner of the public sector. We maintain an open and transparent dialogue with authorities, public officials and politicians.

Special care is required in daily dealings: Monetary or other advantages may not be granted, offered or promised to office bearers and their relatives, either directly or indirectly (e.g. via a third party).

In some areas, particularly strict regulations apply; for example, the special requirements and restrictions on the granting of invitations or gifts must be observed (cf. para. 2.6).

## 02.6

# Invitations and gifts

We attach great importance to good relations with our business partners and our customers. In order to maintain these relationships, business invitations may be extended or low-value courtesy gifts may be given to a reasonable extent. However, strict regulations must be observed in this regard.

It is common business practice for business partners to meet outside of exclusively work-related occasions. Alterric employees are generally permitted to accept customary business invitations from business partners to events to an appropriate extent or to invite business partners to the same extent. The same applies to the acceptance and granting of reasonable and customary gifts in business dealings, such as promotional gifts or general courtesy gifts in the form of bouquets of flowers, etc.

If Alterric employees are unclear as to whether an invitation or gift is lawful, they are encouraged to contact Governance, Risk & Compliance. Acceptance of gifts and invitations by Alterric employees is permitted, provided that the aforementioned principles are observed. However, these internal instructions on the acceptance and granting of invitations and gifts must always be observed.

Invitations and gifts may not be granted if they are intended to give the recipient a special personal advantage or to influence a decision of the recipient. They may not be granted because the recipient requests them. Additional more restrictive conditions apply to public officials. As a rule, additional restrictions apply from the service regulations of the authorities to which a public official belongs.



Transparency with donations and sponsorships.

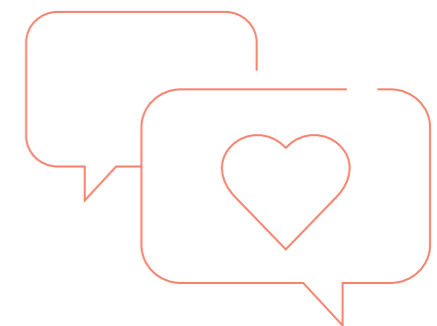
02.7

## Donations and sponsorship

Donations are an expression of our social commitment and have the sole objective of supporting the recipient of the donation. In contrast, our sponsorship activities primarily serve to communicate the Alterric brand and its range of services to existing and potential customers as well as to a relevant public.

The awarding of donations and sponsorship grants must always be transparent. This means that the recipient and the use of the donation must be known, verified and documented. Even the appearance of unfair influence on the recipient's business or official decisions must be avoided. It must be possible for Alterric to account for a donation or sponsorship activity to the public at any time. Cash payments are not made.

Sponsorship may also only take place on the basis of a written contract in which the consideration of the recipient is clearly defined. The consideration must be in reasonable proportion to the sponsorship grant. In addition, the applicable Alterric guidelines must be observed. The additional benefit for the region and society resulting from sponsoring activities is clearly desired by us.





03

**Protection  
of assets  
and information**



### 03.1

## Protection of company property



Company facilities and property must be treated with care and responsibility. All Alterric employees are obliged to protect the company's assets. The company assets may only be used for permissible business purposes and under no circumstances for illegal purposes.

The private use and removal of company property for private purposes is prohibited. Exceptions are those items that are released for private use on the basis of a contractual or company agreement (e.g. company cars, IT equipment) or whose private use is officially or exceptionally permitted by Alterric. Damage, theft or loss must be reported immediately to the responsible organisational unit.



### 03.2

## Data protection

Special legal regulations apply to the protection of personal data. Data is referred to as personal if it contains information about the personal or factual circumstances of a natural person.

In order to meet the legal data protection requirements, Alterric has appointed a data protection officer in accordance with the requirements of the European Data Protection Regulation (EU-DSGVO).

**Stephan Toleikis**

External data protection officer  
datenschutz@alterric.com

National regulations such as the Federal Data Protection Act (BDSG) are also affected by this, which, among other things, stipulates the processing of employment data. This ensures that employee and customer data is only processed if it complies with data protection regulations.

### 03.3

## Trade and business secrets

We are committed to handling sensitive and confidential information and the data of our customers and business partners with care. A breach of confidentiality obligations can be illegal and result in financial or reputational damage for Alterric.

Official documents and data carriers must be protected at all times from access or knowledge by third parties. Confidential information may only be disclosed within the company if it is required for the conduct of business. Confidential information may only be disclosed to third parties if they have previously signed a confidentiality agreement and all legal requirements have been complied with after consultation with the Legal and Governance, Risk & Compliance (GRC) departments. The procedure must be agreed in advance with the legal departments, unless the latter has laid down generally applicable requirements. The obligation to handle confidential information with care remains in force even after the employment or business relationship has ended.



Careful  
handling  
of sensitive  
information  
and data.

# Notice of violations

Alterric depends on the attention and active cooperation of all employees to implement the Code of Conduct. Only when grievances are discovered the necessary measures can be taken to remedy them, avert possible damage to the company and protect the employees.

Every Alterric employee has the responsibility to immediately report an observed violation of legal provisions or the Code of Conduct. In addition, we expressly encourage our customers and business partners to point out violations and anomalies. The protection of the reporting employee is guaranteed at all times by the Whistleblower Protection Act (HinSchG), which comprehensively protects whistleblowers from professional reprisals and retaliation. It is inadmissible in any way to sanction reports made in good faith and to disadvantage the whistleblower.

#### Possible reporting channels

Alterric employees can bring an observed grievance to the attention of their manager or the management. For questions that an employee does not want to discuss with his or her direct manager, the GRC department and the works council are available as confidential and objective points of contact.

GRC / Compliance  
[compliance@alterric.com](mailto:compliance@alterric.com)

In addition, Alterric employees also have the option of submitting information anonymously via the reporting channels described in the "Whistleblowing System" guideline and the "Whistleblower" company agreement. Alterric's digital whistleblowing system is available at:

[alterric.integrityline.app](https://alterric.integrityline.app)



The whistleblowing system meets all requirements with regard to information security and data protection to ensure that the identity of the whistleblower is protected. All designated reporting channels enable Alterric employees, as well as our clients and business partners, to easily submit reports at any time and from anywhere and to obtain information about the current status of the reports.

Alterric assures that any report made in good faith will be treated confidentially and respectfully and guarantees that whistleblowers will be protected from possible reprisals and discrimination.



# The Code of Conduct to go



Our Code of Conduct defines our responsibilities and the behaviours we expect from our employees to ensure a constructive and productive work environment that supports our core values and beliefs. It guides and supports our employees in making the right decisions and doing the right thing.

And if you don't have the full Code of Conduct at hand, here are 5 important questions to ask yourself whenever you are unsure:

- 1 Do my actions comply with the applicable law?
- 2 Do my actions comply with our compliance regulations?
- 3 Are my actions free from personal interests?
- 4 In what light would my behaviour or decision appear in a newspaper article?
- 5 Is it something I am willing to take responsibility for?

Please remember:  
Act when you see a problem.  
Ask if you are not sure.



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