chargecloud

Compliance & Ethics Policy

chargecloud GmbH
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Guiding responsible action at chargecloud – for *people*, *planet*, and *progress*.

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1 Introduction and Scope

At chargecloud GmbH, we strive to be a responsible, trusted, and ethical partner in the European e-mobility ecosystem. This Compliance & Ethics Policy reflects our core values and expectations—for ourselves and our partners. It provides a unified framework for ethical behavior, legal compliance, respect for human rights, and transparent reporting of concerns.

This Policy applies to:

- All chargecloud employees and leadership
- Contractors and service providers
- Our suppliers and business partners

We expect every individual and organization associated with chargecloud to understand and apply the principles outlined in this policy. Compliance is monitored, and updates are communicated via our charge.academy and internal platforms.

2 Our Leadership Responsibility

chargecloud leaders act as role models. They:

- Promote open communication and inclusive teamwork
- Provide ethical guidance and support
- Ensure that this policy is understood and implemented across teams
- Proactively address misconduct and concerns

Leading by example is not optional—it is a core responsibility of leadership.

3 Standards of Conduct at chargecloud

3.1 Integrity, Compliance, and Accountability

We comply with all applicable laws and internal regulations. Violations of this policy, the law, or internal directives may result in appropriate disciplinary action.

3.2 Diversity, Inclusion & Equal Opportunity

We promote a workplace free of discrimination, harassment, or inequality. We:

- Provide equal opportunities regardless of background, gender, or identity
- Foster mutual respect and zero tolerance for hate, bullying, or exclusion
- Expect business partners to uphold the same standards
- Consistently enforce our anti-discrimination policy

3.3 Safe & Healthy Work Environment

We prioritize physical and psychological safety. Our workplace practices:

- Comply with occupational health and safety laws
- Include proactive risk assessments and safety measures
- Are continuously improved with employee input

3.4 Financial Integrity

We maintain accurate records and ensure full transparency in:

- Accounting and financial reporting
- Business documentation and quality reports
- Annual audits conducted by independent external auditors

3.5 Intellectual Property

All work results (e.g., software, systems) created during employment are owned by chargecloud. IP rights are respected, protected, and never misused.

3.6 Communication, Information Security, and Data Protection

We practice clear, honest, and lawful communication.

- Employees complete mandatory information security training annually
- ISO 27001-certified standards are enforced
- Personal data is protected in accordance with GDPR and German privacy laws
- Questions can be directed to: datenschutz@chargecloud.de

4 Expectations of Our Suppliers and Partners

We expect our partners to uphold equivalent standards as outlined in our Supplier Code of Conduct, including:

4.1 Human Rights and Fair Labor

- No child labor, forced labor, slavery, or human trafficking
- Respect for freedom of association
- Fair wages and equal treatment regardless of origin, gender, or belief
- Protection against harassment and exploitation

4.2 Workplace Safety and Environment

- Compliance with ILO and national health & safety laws
- Ongoing risk assessment and improvement
- Active commitment to reducing emissions, waste, and pollution

4.3 Ethical Business Practices

- Fair competition and zero tolerance for price fixing or corruption
- No bribery, extortion, or misappropriation
- Integrity in all interactions and transactions

4.4 Data Protection and Confidentiality

- Compliance with privacy regulations
- Protection of customer, employee, and partner data
- Responsible handling of intellectual property

5 Grievance Mechanisms and Whistleblowing

5.1 Internal Complaints

Employees are encouraged to report issues directly to:

- Their manager
- People & Culture Team (e.g. digital feedback box)
- Compliance or executive leadership

All concerns are treated confidentially. Anonymous feedback is possible via our digital system.

Feedback Form – Management

5.2 Whistleblower Channel

In accordance with the EU Whistleblower Protection Act, chargecloud operates a secure, anonymous whistleblower platform accessible to employees, customers, and partners.

Whistleblower Portal

Reports may cover:

- Bribery, fraud, or financial misconduct
- Workplace abuse or bullying
- Supply chain violations
- Data security or discrimination concerns

Process Timeline:

- Receipt of report acknowledged within 7 days
- Follow-up communication initiated if needed
- Measures communicated within 3 months

5.3 Protection from Retaliation

Any form of retaliation against individuals reporting concerns in good faith is strictly prohibited. This includes demotion, harassment, or exclusion. Leaders are required to reinforce this protection.

6 Enforcement and Non-Compliance

Disregard for the principles in this policy—whether by employees, suppliers, or partners—will result in consequences proportionate to the severity of the violation.

These may include:

- Corrective action or retraining
- Review or termination of business relationships
- Legal steps, if necessary

We reserve the right to conduct audits and request documentation as part of our due diligence obligations.

7 Commitment and Updates

This policy is part of chargecloud's broader commitment to responsible leadership, compliance, and ethical business practices. It is reviewed and updated regularly. By acting in alignment with this policy, each of us contributes to a sustainable, fair, and secure future for e-mobility in Europe.

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