

Code of Conduct for Suppliers of Mainova Group



General

As one of Germany's largest regional energy suppliers, sustainability has long been an important guiding principle for Mainova and integral to the conduct of our business. For us at Mainova, sustainability means that we see ourselves as part of society, accept environmental and social responsibility in order to secure public acceptance as well as the economic success of our company in the long term. In short: We understand sustainability as "securing the future".

We have an economic, ecological and social responsibility to help secure the future for our stakeholders, and we seek to make a credible contribution.

That is why we have made sustainability part of our corporate strategy and why we use the Sustainable Development Goals (SDG) of the United Nations to guide our actions for sustainability.

In addition to the SDGs, the UN Global Compact (UNGC) and the Core Labour Standards of the International Labour Organization (ILO) serve as our framework. They define our commitments in the areas of labour and human rights, ethics and protection of the environment. We expect of our suppliers and also their suppliers and subcontractors that they base their conduct on the same principles, comply with all applicable laws and recognise and conform with the internationally recognised environmental, social and corporate governance standards according to UNGC and ILO.

Our Code of Conduct for Suppliers requires the same commitment of our suppliers that we as Mainova have imposed on ourselves. Sustainable supplier management and respectful business relationships are important to us. We want to drive a process of continuous improvement with our suppliers through mutual dialogue, which also helps to promote sustainable development. By communicating our values, we seek to strengthen existing partnerships and build new business relationships on a basis of responsibility.

The principles of this Code of Conduct are integral to the selection and assessment of suppliers. Our suppliers ensure that the application of the principles of the Code of Conduct, and inform their responsible employees about these principles of conduct.

They furthermore take measures to ensure the implementation of the respective provisions by their responsible employees.

Any breach of the obligations set out in the Code of Conduct for Suppliers is considered a material breach of contract on the part of the supplier. This may lead to the immediate termination of the business relationship and to the assertion of claims for damages as well as other rights.



Labour and human rights

▶ Human rights

We expect of our suppliers that the protection of internationally applicable human rights and their contribution thereto forms a central role in their corporate mission statement and all their activities. This includes in particular the abolition and prevention of child labour, the elimination of forced labour, the prohibition of discrimination in respect of employment and occupation, and the right to collective bargaining and freedom of association. Our suppliers are expected to ensure that their employees are treated fairly and are not subjected to abuse, harassment, corporal punishment and torture, or to threats and coercion in the performance of their work.

Our suppliers are also urged to ensure that there are no human rights violations in their supply chain either.

▶ Protection of health and safety at work

We expect our suppliers to protect the health of their employees and to ensure workplace safety through preventive measures such as regular inspections and assessments. Avoiding damage to health should have the highest priority.

▶ Diversity and inclusivity

We expect our suppliers to ensure that their employees are treated equally. This includes that a person shall not be treated differently on the basis of irrelevant individual criteria, such as gender, disability, age, national or social origin, political affiliation, pregnancy, religion, whether consciously or unconsciously.

The working environment of our suppliers' employees should be protected against discrimination or harassment of individuals.

▶ Compliance with requirements of labour law

We expect our suppliers to observe the applicable legal regulations and ILO standards governing working hours for employees. Our suppliers are obligated to comply with the requirements of the Minimum Wage Act (MiLoG) in Germany. The remuneration of employees is expected to generally be fair and competitive.



Ethik

▶ Business integrity and anti-corruption

We expect our suppliers to conduct their business with integrity. This includes that our suppliers prohibit, do not engage in and do not tolerate corruption, extortion, embezzlement and money laundering in any form.

Furthermore, no unlawful payments or other benefits may be granted to employees or public officials with the aim of influencing decision-making. Applicable laws and ethical standards must not be violated and there must be no unappealable convictions for tax offences, cartel agreements, offences of bribery or other intentional criminal offences.

▶ Conflicts of interest

We expect our suppliers to inform us of circumstances that could give rise to a conflict of interest. This includes, for example, a situation where our employees enjoy professional, private and/or significant financial benefits due to working with suppliers or if they hold an interest in a supplier's company.

▶ Fair competition

We expect our suppliers to observe and comply with all applicable national and international antitrust laws. This includes that our suppliers are required to take action against unfair, non-transparent and restricted competition and to take appropriate preventive measures where possible.

▶ Data protection

We expect our suppliers to handle the protection of confidential information and intellectual property rights in an appropriate and lawful manner. They are expected to refrain from passing on confidential data and information to third parties and to ensure that such data and information are only stored in a secure manner.



Environment

▶ Conservation of resources and climate protection

We expect our suppliers to promote the careful and economical use of natural resources and to use them efficiently. In addition, the use of energy-efficient and environmentally friendly technologies are to be considered a priority. Our suppliers should endeavour to actively reduce the negative impacts of their activities on the environment, which includes the loss of biodiversity, climate change or water scarcity, and to actively counteract such negative effects with strategies they develop. Suppliers should furthermore be committed to promote climate-friendly processes, materials and products.

▶ Waste and emissions

We expect our suppliers to do their part to reduce the amount of waste generated. Similarly, emissions to air, water and soil resulting from their activities should be controlled and minimised.

▶ Emergency and preventive measures and handling of hazardous substances

We expect our suppliers to promote and ensure safety and environmental compatibility in the development, manufacture, transport, use and disposal of their products. Prevention measures and risk training must be in place to ensure that the supplier's employees and the general public are not put at risk. In addition, the handling of substances and related activities that may have a negative impact on people and the environment shall be subject to continuous control and managed appropriately. This also applies in particular to substances falling under the REACH Regulation. It must be ensured that hazardous substances do not pose a risk to the environment and people such as in procurement, direct handling, movement, storage, reuse and disposal. To this end, they must be explicitly labelled.



Management systems

▶ Supplier development

We expect our suppliers to participate in the continuous improvement of the sustainability performance of all parties through trustful cooperation. We reserve the right to ask selected suppliers to complete a questionnaire on questions of sustainability and, if necessary, to audit them in accordance with the Mainova Supplier Code.

Where this is required, suppliers should be able to demonstrate that generally recognised quality standards are met.

We enter into direct dialogue with suppliers and discuss development with a focus on continuous improvements regarding sustainability and their documentation.

▶ Complaints procedure

Mainova strives to identify and stop violations against applicable law, general standards of conduct or internal principles. Mainova relies on potential misconduct being reported; only this way can problems be uncovered at an early stage and remedied without delay.

If you therefore have any indications of misconduct, you should immediately contact the Compliance Department of Mainova AG or our external ombudsman by phone or in writing.

The contact details are as follows:

Chief Compliance Officer:

Ms. Christina Stoyanov
Solmsstraße 38
60486 Frankfurt am Main
Email: compliance@mainova.de
Phone: +4969 213-25212

Ombudsman:

Lawyer Dr. Felix Dörr
Neue Mainzer Straße 26
60311 Frankfurt am Main
Email: ombudsman@doerr-frankfurt.de
Phone: +4969 1381-333

Communication with our contacts is of course treated confidentially and not subject to any sanction measures. Information about the identity of the whistleblower or about circumstances that may allow conclusions about their identity may only be disclosed if this is necessary for follow-up measures and if the whistleblower consents to the disclosure, or if this is reasonably required in the context of investigations by national authorities or judicial proceedings.

City, Date

Signature (*managing director or board member*) and company stamp