

Code of Conduct of the SOLARWATT Group

Our responsibilities

Foreword

Dear Colleagues,

Our joint commitment is the foundation for SOLARWATT's success, both today and in the future. However, we do not intend to wait for the future, but to go ahead and actively shape it ourselves. Thus, we are willing to take on responsibility, going hand in hand with our self-image as part and member of a social and sustainable system. However, this responsibility does not stop with us, the management. Just as we expect ourselves to take responsibility for the success of our business and the realization of our corporate goals by making decisions and behaving in a manner that is based on integrity and sustainability as well as in line with our corporate objectives, we also expect you to live our shared values and principles, on which this Code of Conduct is based, in your day-to-day work. Each of us is required to take responsibility for our actions. This Code of Conduct is intended to support us in our efforts to comply not only with laws and regulations, but also to go beyond. It documents our aspiration to always conduct ourselves ethically and with integrity, respecting the rights of any person as individuals and acting in harmony with our environment.

Leading by example is essential for all of us - regardless of our responsibilities and respective positions at SOLARWATT. We therefore call on you to join us in promoting integrity, ethics and responsibility at SOLARWATT.



Detlef Neuhaus
CEO



Sven Böhm
CFO



Dr. Armin Froitzheim
CTO

Preamble

Our Code of Conduct ("CoC") describes the standards to which we adhere as employees of SOLARWATT. It is based on our vision and mission statement:

"With simple, complete energy solutions, we contribute to minimizing climate change. This is how we create the greatest possible value for our planet, our customers and our company."

and the corporate values derived from it:

- Professionalism
- leadership responsibility
- collegiality
- Innovation

Our CoC serves as a guide to how we conduct ourselves professionally, ethically and responsibly in the course of our business and in compliance with applicable laws and regulations. It aims to support all of us in our daily work by providing binding guidelines and rules, and to highlight ethical and legal challenges. It applies to all bodies and employees (hereinafter "employees") of SOLARWATT GmbH as well as its shareholdings (hereinafter "SOLARWATT").

Our CoC defines our responsibilities and is divided into five areas:

- Our responsibility in business transactions
- Our responsibility in dealing with each other
- Our responsibility as a member of society
- Our responsibility in dealing with information
- Our responsibility for corporate resources

Our responsibility in business transactions

Compliance with laws and regulations

SOLARWATT is committed to fulfilling our social responsibility in all corporate activities and to observing the applicable laws and regulations.

The principle of compliance with the law expressly applies even if SOLARWATT would gain perceived advantages by violating the law. We are all obligated to observe the applicable laws and regulations, internal company guidelines, instructions and directives, including this CoC, and to act accordingly.

Avoidance of conflicts of interest

SOLARWATT attaches great importance to protecting the reputation of the company. We must therefore ensure that our relationships with third parties are impeccable and that we can make objective and loyal business decisions for SOLARWATT. When dealing with business partners such as customers, suppliers, service providers and government institutions, we must strictly separate SOLARWATT's interests from our private interests. Situations that could lead to a conflict between personal interests and those of SOLARWATT - as well as the appearance of a conflict of interest - are to be avoided. If this is not possible and conflicts of interest nevertheless arise, they must be made transparent and disclosed to the respective manager. Further information on dealing with conflicts of interest is provided in our DOs & DON'ts.

Anti-corruption

SOLARWATT does not accept or tolerate any form of direct or indirect bribery, corruption or other unjustified granting of advantages to business partners, public officials and decision-makers and other third parties. We comply with applicable laws against corruption, including but not limited to extortion, fraud, bribery or corruption.

In this context, special attention must be paid to gifts and hospitality. In the normal course of business, business invitations or gifts are certainly part of cultivating relationships. As a matter of principle, we do not offer hospitality, nor do we give or accept gifts that can be regarded excessive considering the circumstances, frequency, value, timing of the gift, the position of the giver or receiver, and the total value. Gifts and hospitality in relation to public officials or governmental organizations are generally prohibited. The handling of gifts and hospitality is regulated in more detail in SOLARWATT's DOs & DON'Ts.

Money Laundering Prevention

We comply with our legal obligations to prevent money laundering and do not engage in any money laundering activities. We take appropriate and risk-based measures to this end.

Import and export control regulations

We follow existing trade controls and comply with import and export control regulations and economic embargoes.

Fair competition

SOLARWATT is fully committed to fair competition and complies with applicable antitrust and competition laws. Violations will not be tolerated and violations will be sanctioned. Even the appearance of any anti-competitive behavior is to be avoided. Special care must be taken at association events, trade shows or other meetings with competitors. Further details are governed by our DOs & DON'Ts.

Quality and safety of our products

The quality of our products and their safety for our customers and business partners are essential elements of our identity and the perception of SOLARWATT in the market. Therefore, we follow all quality control requirements relevant to our operations and honor our customers' contractual provisions and specifications. We ensure that our suppliers establish and maintain effective methods and processes to prevent plagiarized parts from entering supply chain circulation.

Responsible supply chain

For SOLARWATT, constructive as well as trusting and respectful cooperation with our business partners as part of the supply chain is central. Therefore, we generally expect our business partners to comply with our "Business Partner Code of Conduct" and to pass on our standards within their supplier relationships as well as to demand and ensure compliance with them.

Our responsibility in dealing with each other

Equal treatment and non-discrimination

SOLARWATT promotes equal opportunities and respects the structures, customs and traditions of other cultures. We advocate equal rights and do not tolerate any form of disadvantage or discrimination based on nationality, ethnic origin, skin color, sexual identity, religion, world view or disability or based on gender or age. We do not tolerate any form of sexual harassment, coercion, bullying and verbal or even physical abuse. This also applies to any intimidating, hostile or offensive behavior.

Human and employee rights

SOLARWATT is committed to upholding internationally recognized human rights and rejects all forms of child and forced labor.

We respect the fundamental right to freedom of association and the right to collective bargaining within the framework of national laws. We ensure that there are no negative consequences for employees who engage in this form of work. We recognize the right to adequate remuneration including social benefits.

Occupational health and safety

SOLARWATT is responsible for the occupational safety and health of our employees. Each of us promotes health and safety in his or her work environment and complies with occupational health and safety regulations. It is the responsibility of our managers to instruct and support their employees in fulfilling this responsibility.

• Our responsibility as a member of society

Sustainable environmental, climate and species protection

For us, acting in an environmentally conscious manner and treating natural resources with care are ethical and corporate obligations. Thus, we contribute to the conservation of natural resources, biodiversity and the protection of our climate for future generations. By doing this, we secure our own economic viability and competitiveness in the long term. We regard the compliance with the applicable environmental regulations as a basic condition. We all have a responsibility to treat our natural resources with care and to contribute to the protection of the environment, climate and biodiversity through our actions.

Donations and sponsoring

SOLARWATT is a member of society and is involved in the social and community environment. Any donations are made transparently and exclusively in the interest of our company. We do not make donations for political purposes or to party-affiliated or party-like organizations, elected officials or political candidates.

Communication and social media

Today, especially through social media, many can be reached worldwide within a short period of time. This increases our responsibility as a company, but also that of each and every one of us. Therefore, communication for SOLARWATT in public is carried out exclusively by those authorized for this purpose by the management.

In the case of private expressions of opinion in public that have no connection with our operational tasks and functions at SOLARWATT, we make it clear that the contribution reflects our personal view and not that of SOLARWATT. Any statement damaging to the company must be refrained from and confidential company information must be protected.

- **Our responsibility in handling information**

Reporting

Transparent and truthful reporting as well as communication on SOLARWATT's business transactions is of central importance to us. We ensure that the information contained in our internal and external business records is accurate, comprehensive, appropriate and understandable, as well as timely and system-compatible.

Information security and data protection

We are committed to using electronic information systems in compliance with legal requirements and our internal company policies and directives, using available safeguards and security procedures (especially encryption and passwords).

We do not store any business data on private media.

Personal data is treated confidentially by us and may only be collected, processed and used in accordance with the relevant data protection regulations.

Confidentiality

Each of us is obligated to maintain confidentiality about all internal matters and confidential information of SOLARWATT, including confidential information of our customers, suppliers and business partners.

We are obligated to protect confidential information at all times, unless disclosure is expressly authorized by the responsible manager. This also applies to colleagues. The disclosure of confidential information to colleagues is only permitted on a need-to-know basis.

Our responsibility for corporate resources**Protection of company property**

Tangible and intangible assets entrusted to us in the course of our activities are the property of SOLARWATT and must be protected against loss, damage, misuse and theft. Transfer to unauthorized third parties is prohibited. Entrusted assets (for example laptops) may only be used for private purposes if this is expressly and verifiably permitted. We refrain from any behavior that is likely to damage the image and reputation of SOLARWATT.

Protection of third-party assets

We respect the intellectual property of third parties as well as other protective rights (for example copyrights). We must never infringe the intellectual property rights of third parties, for example by violating copyrights or downloading software without the owner's permission.

Contact persons and handling of doubtful cases

Seek advice - report concerns!

This CoC serves as an orientation for all of us, but cannot conclusively address every case of doubt or problematic individual situation and offer a simple solution. In more complex cases, additional counseling may be necessary. In line with our values, we encourage all employees to seek advice - especially in cases of doubt - and to report information about violations of this CoC, applicable policies or applicable law. Our executives and the management of SOLARWATT are available as contact persons at any time. In addition, it is possible to contact our Risk- and Compliance Officer at compliance@solarwatt.com. All tips will be treated confidentially and with appropriate care. SOLARWATT guarantees that honest whistleblowers will not suffer any disadvantages as a result of their tip. Pressure, intimidation or similar towards the whistleblower is prohibited and may be subject to disciplinary action. Deliberate abuse of the reporting channels will not be tolerated.

This offer is further extended by the possibility to report indications of possible violations of the law or violations of internal guidelines such as this CoC to the SOLARWATT Ombuds Office solarwatt@compliance-aid.com. All information will be treated confidentially. Further information can be found here.

Violations of this CoC as well as internal guidelines and applicable law will not be tolerated and will be sanctioned with hm