

THE FASTNED CODE OF CONDUCT

The Fastned Code of Conduct is part of the employment contracts of all our employees and is therewith applicable to all our employees. The Fastned Code of Conduct sets clear expectations for behavior, fosters a positive and inclusive workplace culture, demonstrates commitment to ethics and compliance and mitigates risks related to misconduct or legal issues.

1. Fastned's mission

Fastned's mission is to accelerate the transition to electric mobility.

Mission statement: "We need to rapidly reduce global greenhouse gas (GHG) emissions in order to prevent severe climate change. Transport represents almost a quarter of Europe's greenhouse gas emissions. You don't have to be a Nobel laureate to put one and one together and conclude that the sooner society switches to driving on renewable electricity, the sooner we can curb the climate crisis. That's where we come in.

Fast charging is key to making electric driving reliable, convenient and pleasant. In fact, its emergence is an important reason for electric driving becoming mainstream in much of Europe. We're proud to say that we were the first to build and operate much of the fast charging infrastructure you see along European roads today. Right now, we're on pace to make our award winning charging experience available to millions of drivers, making it much easier for them to switch to electric driving.

That said, even an electric revolution is built one person at a time. Every new EV driver matters. Every fast charging session matters. That's why our mission statement is not a paper plane. To us, it's a constant reminder of what it takes to change the world."

2. Behavioral Expectations from our Fastned employees

We published our Fastned Diversity, Equity and Inclusion Mission Statement on our website.

2.1. Respect and inclusion within Fastned

We are committed to fostering a workplace where everyone feels respected, valued, and empowered to contribute their best work. Discrimination, harassment, or any form of exclusionary behavior based on race, ethnicity, gender, sexual orientation, age, religion, disability, or any other protected characteristic is strictly prohibited.

We encourage open-mindedness and collaboration, recognizing that diverse perspectives strengthen our team and drive innovation. Treating colleagues, customers, and partners with courtesy and fairness is essential to upholding our inclusive culture.

We will recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed. And the goals we set for ourselves in our Diversity, Equity and Inclusion Mission Statement. We embrace clear standards on employees' and human rights, such as zero tolerance for harassment and discrimination, child and forced labour and human rights violations.



2.2. Professionalism

Professionalism is expected in all interactions, whether with colleagues, clients, or external partners. This includes maintaining a positive attitude, being punctual, delivering on commitments, and communicating clearly and respectfully.

We aim to foster an environment of trust and dependability. Employees should handle disagreements constructively, avoid gossip or undermining behavior, and always represent the company with integrity and a commitment to excellence.

3. Legal and Ethical Compliance

3.1. Commitment to laws and regulations

Gifts and invitations: We create goodwill and foster long-lasting business relations. We offer and accept gifts in an appropriate and transparent manner, which we preferably share with the whole team. Hosting of and participating in events that contribute to the development and growth of infrastructure for electric cars is part of our business. We provide and accept entertainment and hospitality openly and unconditionally as a gesture of esteem and goodwill, while maintaining independence and safeguarding reputations.

Please read the Gift and Invitation policy for more information on this topic. Gifts and Invitations of any value must be reported to the manager and legal compliance manager via form on the wiki or via the Gift and Invitation policy.

Anti corruption: We are committed to conducting business with the highest standards of honesty, transparency, and ethical responsibility. Employees, contractors, and partners must not engage in any form of bribery, kickbacks, or corruption, whether in dealings with government officials, clients, vendors, or other stakeholders. This includes offering, giving, receiving, or soliciting anything of value as an improper influence on business decisions. This clause should be considered with alignment of the Gift and Invitations policy, above.

Fair competition: We are committed to the principle of vigorous but fair competition. We adhere to laws and regulations which are designed to ensure effective competition. In particular, our business relations with customers and suppliers, as well as occasional contacts with competitors, require careful attention to competition rules wherever we do business.

Financial integrity: All financial records and reports must accurately reflect the company's transactions and adhere to applicable accounting standards and legal requirements. Misrepresentation, falsification, or omission of financial data is strictly prohibited.

3.2. Protection of company assets

Intellectual property: Our intellectual property (IP) is a critical asset that drives our innovation and competitive advantage. Employees are expected to protect the company's IP, including patents, trademarks, copyrights, designs, trade secrets, and proprietary software. Unauthorized use, sharing, or reproduction of our IP is prohibited.



Employees must also respect the intellectual property rights of others and ensure that external materials used in our work are appropriately licensed or approved.

Confidential information: Confidential information is vital to our business success and includes non-public data related to strategies, operations, clients, employees, and partners. Employees must safeguard confidential information and avoid disclosing it to unauthorized individuals or entities. This obligation extends beyond the duration of employment. When handling sensitive data, employees should use secure communication channels and comply with internal data protection policies.

We may come across information that is not yet publicly available, but which could be valuable to investors. No employee may disclose or use non-public information that a reasonable investor would consider important when deciding whether to trade. Therefore please be aware that employees are never allowed to bring price sensitive data outside the company or trade with price sensitive data as described in the Insider Trading Policy.

Physical resources: Our physical resources, including phones, laptops, electric pool cars, office equipment, technology, tools, and supplies, are provided to support business operations. Employees are responsible for using these resources efficiently, safely, and for legitimate business purposes. Misuse, theft, or neglect of company property is strictly prohibited. Report any damage, loss, or unauthorized use of physical resources to your manager or the relevant department immediately.

3.3. Obligations on Company Trainings

All employees and contractors (i.e. temporary hires) receive training on business ethics standards through our Legal onboarding sessions.

Fastned provides for obligatory company training on for example privacy law and data protection. All employees are obliged to do these training sessions. Not doing these obligatory training can affect your performance.

4. Workplace Environment

4.1. Health, safety and environment

We are committed to providing a safe and healthy workplace for all employees, contractors, and visitors. Each employee is responsible for following safety protocols, using equipment properly, and reporting any hazards or unsafe conditions immediately.

We expect all employees and people we work with to act responsibly to prevent accidents and injuries, including adhering to emergency procedures, complying with health and safety regulations, and participating in required training. Any form of reckless or negligent behavior that endangers the safety of others is strictly prohibited.

Your health and well-being are priorities. We encourage you to speak up about any safety concerns or workplace conditions that could impact your physical or mental health.

4.2. Employee well-being



At Fastned we believe in an open and continuous feedback culture. In addition to an open feedback culture where it is important to learn from each other, we encourage taking training and courses to further develop yourself therefore we have a yearly training budget. Please read our training policy on Hibob on this topic.

At our various offices we provide a healthy working environment where there is always plenty of healthy and vegetarian food available. We also offer the opportunity to join sports classes with your colleagues in our offices.

In case you are struggling with your personal well-being we encourage you to reach out to your manager or to the People team. They will treat any conversation confidentially and work with you to see how Fastned can best support you.

We hold an annual employee engagement survey, which is an opportunity for employees to share how they feel about various aspects of their work at Fastned, and to understand what the company can do even better. In the meantime, don't hesitate to give feedback if you would like things to be different.

4.3. Alcohol and drugs

We are dedicated to maintaining a safe, productive, and professional workplace. The use, possession, distribution, or sale of illegal drugs or the misuse of alcohol or prescription medication while on company premises, during work hours, or while representing the company is strictly prohibited.

Exceptions may be made for the responsible consumption of alcohol at company-sanctioned events, provided it is done in accordance with applicable laws and with professionalism. Drugs are prohibited from all company-sanctioned events.

4.4. Vegetarian Food

Vegetarian food is served at the various Fastned offices. If you eat out at Fastned's expense, we encourage you to eat vegetarian food whenever possible.

5. Digital and Data Policies

5.1. Proper use of technology

Our technology resources, including computers, email, internet access, and software, are provided to support business operations. Employees are expected to use these resources responsibly, professionally, and in compliance with company policies.

The use of company technology for personal purposes should be limited and must not interfere with work responsibilities or violate any laws or company policies. Employees must refrain from accessing inappropriate or unauthorized content, sharing offensive material, or engaging in activities that could compromise network security.

5.2. Records keeping

Accurate and complete data are essential to make informed business decisions. It is crucial therefore that we are able to provide reliable information to all our stakeholders. We



all have a duty to ensure that our records, financial and non-financial, are accurate, complete, consistent and up-to-date.

5.3. Data Privacy Guidelines

The company is committed to protecting the privacy and confidentiality of data, including personal information about employees, customers, and business partners. Employees must handle sensitive data in accordance with our internal data protection policy, as well as all applicable privacy laws, ensuring it is collected, used, and stored responsibly.

Employees should never share passwords, leave devices unsecured, or use unapproved software or storage solutions that could compromise data security. Any suspected data breaches, phishing attempts, or cybersecurity threats must be reported immediately to the IT department.

Please read our Employee Privacy Notice outlining how employee personal data is processed.

5.4. Use of Al

Artificial intelligence (AI) is a solution transforming business and could help Fastned improve operational processes, enhance efficiency, and drive innovation across various domains delivering the best charging experience. Additionally, the use of AI does come with potential risks to be considered, such as biased outcomes or data security aspects, to balance with the opportunity. Therefore you are only allowed to work with AI if you follow the AI company guidelines that will be adapted from time to time. And keep in mind that you never put any confidential information, other sensitive information or Fastneds' name in the tools you are using.

5.5. Social media usage

Employees must exercise caution and professionalism when using social media, both personally and on behalf of the company. Avoid sharing confidential information, making defamatory statements, or engaging in behavior that could harm the company's reputation.

When representing the company online, adhere to approved guidelines and maintain a respectful and professional tone. Personal opinions expressed on social media should not be attributed to the company. Please check the Fastned Wiki for more social media guidelines.

6. Conflicts of Interest and Reporting Concerns

6.1. Conflicts of interest

Employees are expected to act in the best interests of the company and avoid situations where personal, financial, or other interests might conflict with their responsibilities. A conflict of interest arises when an employee's actions or decisions at work could be influenced by personal gain or relationships.



Examples of potential conflicts include:

- Engaging in business with a competitor, supplier, or customer outside the scope of your employment.
- Holding a financial interest in a company that does business with or competes with our organization.
- Hiring or supervising a family member or close friend without proper disclosure.
- Using company resources for personal projects or external ventures.

Employees must disclose any actual, potential, or perceived conflicts of interest to their manager or People team as soon as they arise. The company will review disclosures confidentially and work with employees to manage or resolve conflicts appropriately.

6.2. How to report concerns (anonymously) with Whistleblower policy

We believe it is important that anyone can report, anonymously or not, concerns of any nature within the company. Each report is treated as highly confidential, and the utmost care is taken to resolve any concerns. Please read more about our Complaints Procedure in the Non Compliance Response Policy. Concerns regarding organizational and societal risks are laid down in our <u>Whistleblower Policy</u>.

6.3. Fraud

We do not accept any behaviour that is intended to deceive or mislead others. All our employees are required to prevent fraud within our Company and to report any fraud or suspicion of fraud. This policy is detailed in the Non Compliance Response Policy.

7. Consequences of Violations

Adherence to this Code of Conduct is essential to maintaining our values and ensuring a respectful, ethical, and compliant workplace. Any violation of the Code, company policies, or applicable laws may result in disciplinary action, up to and including termination of employment.

Possible disciplinary actions include, but are not limited to:

- Verbal or written warnings.
- Mandatory training or counseling.
- Suspension or temporary removal from specific duties.
- Financial penalties or restitution for damages caused.
- Termination of employment or contract.

Disciplinary measures will be determined based on the severity of the violation, its impact on the company, and any relevant mitigating factors. We are committed to ensuring that all investigations are conducted fairly, consistently, and confidentially, with an opportunity for the individual to provide their perspective during the process.