

# FASTCHARGE Supplier Code of Conduct



Edition 1 I 2024

# Introduction

Fastcharge is a supplier of infrastructure supporting fossil-free charging services for HDEVs (Heavy Duty Electric Vehicles) in Norway. Our mission is to drive prosperity through transport solutions, and our approach to sustainability is an important part of the success of our company. We believe in developing, producing and distributing products and services in a responsible sustainable way, as these builds trust with our customers, society and our business partners. Fastcharge shall always operate its business in a responsibly way, in accordance with applicable laws and regulations.

Our suppliers, defined in the "Scope" section, play an integral role in our sustainability journey, and we can never succeed without our suppliers' contributions in the value chain. In order to achieve our goal of becoming the most wanted supplier of fossil-free charging services for HDEVs in Norway, we need our suppliers' full commitment to support our sustainability journey through the care they invest in the parts, components and services they deliver.

The Fastcharge SCoC (Supplier Code of Conduct) describes how we will meet our objectives and the expectations of our suppliers. If we take collective responsibility for making the world a better place, we can make a difference and build a better for future generations.

Oslo, september 2024

CEO

# Content

| 1. | Pur  | pose and Scope                                     | 4    |
|----|------|--|------|
| 2. | Hur  | man Rights and Working conditions                  | 5    |
|    | 2.1. | Modern slavery and Forced labour                   | 5    |
|    | 2.2. | Child Labour                                       | 6    |
|    | 2.3. | Freedom of Association and Collective Bargaining   | 6    |
|    | 2.4. | Non-Discrimination, Non-Harassement and Fair Trade | 6    |
|    | 2.5. | Working hours, Leave and Compensation              | 6    |
| 3. | Hea  | alth and Safety                                    | 7    |
| 4. | Env  | vironmentahl Standards                             | 8    |
| 5. | Bus  | siness Ethics                                      | 9    |
| 6. | Res  | ponsible Sourcing of Raw Materials                 | . 11 |
| 7. | Imp  | plementation and Compliance                        | 11   |

## 1. Purpose and Scope

The purpose of the SCoC: is to define minimum sustainability requirements and ambitions for all our suppliers, in the areas of:

- Human rights and working conditions
- Health and safety
- Environmental Standards
- Business ethics
- Responsible purchasing of raw materials

The SCoC is reflecting Fastcharge's ethical guidelines, environmental policy as well as international conventions and standards such as <u>Drive Sustainability</u> og <u>UN Global Compact</u>, <u>OECD Guidelines for</u> <u>Multinational Enterprises</u>, <u>UN Guiding Principles of Business and Human Rights</u>, <u>UN International Bill of</u> <u>Human Rights</u>, <u>International Labour Organisation's (ILO) Fundamental Instruments of Principles of Rights at Work</u>, og <u>Unicef Children's Rights and Business Principles</u>.

**The scope of the SCoC**: to be an integral part of the agreement between the supplier and Fastcharge. The term "employee" covers anyone working for or on behalf of a supplier, including but not limited to full-time and part-time employees, consultants, contractors, trainees, temporary workers, migrant workers, senior management and the board of directors.

The SCoC applies to all suppliers who supply goods and/or services to Fastcharge, including their parent, subsidiary or affiliated entities as well as their respective employees and agents. For each area of the SCoC, Fastcharge has defined two categories for our suppliers' sustainability performance and actions – REQUIREMENTS and EXPECTATIONS:

REQUIREMENTS: All suppliers must comply with basic requirements. Breach of requirements is considered a material failure and will give Fastcharge the right to terminate the business relationship.

EXPECTATIONS: Fastcharge encourages suppliers to actively go beyond basic requirements to further promote the suppliers sustainable performance and impact in the areas covered by the SCoC.

#### General requirement

- Supplier must ensure that all requirements in the SCoC are followed in its own business and their subcontractors. We encourage suppliers' to actively try to live up to our expectations.
- Supplier must operate honestly and be transparent with facts and data in relation to requirements. Fastcharge wants to maintain an open dialogue about achievements, trends and opportunities for improvement in the areas of the SCoC. Environmental data related to production, product and transport must be available on request, so that Fastcharge can carry out environmental life-cycle assessments.
- The supplier must have a senior manager responsible for compliance with the areas of the SCoC.
- The supplier must have a SCoC in place to clarify the suppliers' rules of conduct and responsible behavior for their employees.
- The supplier must be proactive and appropriately address any risk of breaching requirements in its own operations and supply chains.
- The supplier must implement appropriate complaint channels and reporting mechanisms, available to all employees and third parties to report deviations, raise concerns or complaints, but also recommendations and improvement ideas regarding the supplier's operations, without fear of retaliation.

#### Management system

The supplier must establish and maintain its own management system, sufficient to monitor all elements of the SCoC, in relation to the size, complexity and risk environment of the supplier's business. The management system must contain policy from the supplier's management, as well as ensure effective due diligence and risk assessment, clarify responsibilities for relevant personnel, including monitoring and mechanisms for reporting related to all areas of the SCoC. The management system must be continuously reviewed, monitored and improved, preferably under third-party certification.

#### Compliance with laws and regulations

The basis for all areas of the SCoC and baseline for all interactions with Fastcharge, is that the supplier must be knowledgeable about and comply with all applicable laws and regulations, as well as agreed contractual terms with Fastcharge. All statutory permits, approvals, licenses, registrations, inspections and related reports shall be in place, up to date and available for inspection upon request.

In the event that local laws and regulations are less restrictive, principles in the SCoC shall apply. In the event that claims are covered by the supplier's own code of SCoC, or in the applicable law and/or agreement with Fastcharge, the strictest regulation that provides the greatest protection applies. In cases where there is a direct conflict between mandatory local law and principles in the SCoC, local law applies.

#### Continuous improvements

Fastcharge believes in systematic work for continuous improvement and recognizes that the implementation of standards in the SCoC and supply chains is a dynamic process. It is important to us that our suppliers' show dedication to embed not only requirements but also expectations into their operations and across their supply chains, and to seek continuous improvement over time in order to be able to demonstrate progress in all areas covered of this SCoC.

## 2. Human Rights and Working Conditions

Fastcharge respects all internationally recognized human rights and treats all people with respect and dignity. We do not condone or engage in any human rights violations, and we expect our employees, business partners and suppliers to have the same commitment. Fastcharge is committed to offering working conditions that comply with legislation, enabling employees' professional development and team building in a healthy working environment.

#### 2.1. Modern Slavery and Forced Labour

Fastcharge is a human-focused company that believes in building a better future for everyone. Our commitment to respect human rights not only covers our own business and employees, but also local communities near our business, supply partners and people who could potentially be affected by the use of our products and solutions. We do not condone, promote or engage in any form of modern slavery, including forced labour, voluntary forced labour, involuntary forced labor or human trafficking. Fastcharge requires the same commitment from its supplier network.

The people in Fastcharge are legally employed, have voluntarily chosen a job and are free to leave the company in accordance with the employment agreement and legislation. We work with our customers, business partners and suppliers to prevent and report human rights violations throughout the supplier network.

#### 2.2. Child Labour

Fastcharge does not tolerate, promote or engage in any forms of child labour, and we are against all forms of financial exploitation of children. Fastcharge does not employ children before the completion of compulsory education and before the minimum working age according to current legislation. Young workers (under the age of 18) must not perform work that may expose them to physical, metallic or moral harm. Fastcharge requires the same commitment from its supplier network.

Fastcharge suppliers must prevent all forms of child labor and respect children's rights to development, play and education in line with the UN Convention on the Rights of the Child. We work with our customers, business partners and suppliers to prevent and report violations of the Child Protection Convention throughout our supplier network.

#### 2.3. Freedom of Association and Collective Bargaining

All Fastcharge employees shall have the right to legally form, join or not join trade unions, bargain collectively, seek representation and join workers' councils in accordance with legislation and international conventions. Employees must be able to communicate openly and share ideas and concerns with management about working conditions and management without fear of discrimination or retaliation. Fastcharge requires the same commitment from its supplier network.

Where local law restricts the right to freedom of association and collective bargaining, suppliers must allow alternative forms of work for representation and negotiations. Fastcharge expects suppliers to participate in active dialogue with their employees based on motivation, recognition and rewards to stimulate performance and commitment in the workplace. Fastcharge encourages suppliers to engage constructively with relevant stakeholders such as voluntary organizations, trade associations and employee representatives for sustained relationships between employers and employees.

#### 2.4. Non-Discrimination, Non-Harassment and Fair Trade

Fastcharge treats all people with dignity and respect, and provides equal employment solely based on knowledge, skills and competence to perform the job, regardless of people's personal and cultural background, skin color, religion, sexual orientation, gender and disabilities. We do not under any circumstances tolerate verbal, psychological, physical or sexual harassment. This also includes campaigns in the company and the choice of suppliers for the delivery of products or services. Fastcharge requires the same commitment from its supplier network.

Fastcharge encourages suppliers to engage constructively with non-governmental organizations and industry associations, to build awareness and work proactively to identify root causes of discrimination.

#### 2.5. Working Hours, Leave and Compensation

Fastcharge always respects and complies with applicable laws, employment contracts and collective agreements regarding compensation, benefits, working and rest time, including overtime, voluntary overtime, as well as annual, sick and parental leave and any other applicable leave provisions. Fastcharge requires the same commitment from its supplier network, and that suppliers must comply with ILO Convention No. 1 and No. 30 on working time.

Suppliers must maintain reasonable working time schedules for their employees to prevent qualityand/or safety breaches, and to minimize stress on employees' physical and mental health. Suppliers must provide their employees with information about their terms and conditions of employment, including

benefits, in a format and language they can easily understand, including written employment contracts and salary terms. It is only permitted to deduct from wages if and to the extent prescribed by applicable law, regulations or collective agreements.

Fastcharge encourages suppliers to adopt a salary structure that reflects employees' skills and experience as well as the countries salary standard, as well as facilitate a work-freetime life balance.

## 3. Health and Safety

Suppliers shall provide Employees a safe and healthy working environment that minimizes the incidence of work-related injuries and enhances the quality of products and services, the consistency of production and worker retention and morale. This applies to Supplier's production facilities but also to any company provided accommodation such as dormitories as well any type of transportation provided by a Supplier to its Employees.

REQUIREMENT: Supplier shall ensure that its Employees' potential exposure to safety hazards, such as machines, equipment or substances, or other chemical, biological or physical agents, are identified, assessed and controlled through proper design and/or preventative maintenance and safe work procedures. Where hazards cannot be adequately controlled by these means, Employees shall be provided with appropriate personal protective equipment including access to first-aid supplies. Safety information shall be made available to everyone in order to educate, train, and protect the Employees from safety hazards.

REQUIREMENT: Supplier shall have adequate emergency preparedness procedures in place in order to identify and assess potential emergency situations. Emergency plans, fire safety and response procedures shall be implemented, including Employee notification and evacuation procedures, Employee training and evacuation drills. Fire safety procedures shall, where available, be periodically reviewed and approved by local authorities. Employees shall have ready access to clean drinking water, hygienic toilet facilities, hygienic food preparation, storage and eating facilities, adequate ventilation, light and temperature levels, and acceptable levels of noise and dust pollution (as applicable).

EXPECTATION: Supplier is encouraged to work proactively with a long-term health and safety strategy, which includes aspects on age, disability, gender and religion

## 4. Environmental Standards

Fastcharge environmental performance is critical important for achieving success. Fastcharge expects its Suppliers to reduce their negative environmental impacts by protecting the environment, conserving natural resources and continuously striving towards reducing the environmental footprint of their production, products and services throughout their entire life cycle. The life cycle stages include acquisition of raw materials, design, production, transportation/delivery, use, end-of-life treatment and final disposal. Suppliers are expected to handle environmental violations and complaints methodically and communicate them to affected Employees and to external stakeholders including Fastcharge, if relevant.

#### Resource Efficiency and Energy Consumption Emissions and Waste Management

REQUIREMENT: Supplier shall monitor, track and document its consumption of natural resources such as water and raw materials, as well as sources of energy in order to be able to identify aspects that Supplier

can control and can influence fostering opportunities for improvement and minimized consumption. Consumption shall be monitored, tracked and documented on both the site and corporate level and provided to Fastcharge upon request.

REQUIREMENT: Supplier shall monitor, track and document its emissions to air, water and soil from its facilities and transports as well as the wastewater and solid waste generated by its operations in order to be able to identify aspects that Supplier can control and influence fostering opportunities for improvement and minimized emission. All output shall be monitored, tracked and documented on both the site and corporate level and be provided to Fastcharge upon request. Supplier shall monitor, track and document the composition of their packaging material which becomes waste at Fastcharge in order to facilitate steps towards circular economy, e.g. utilizing non-complex materials and/or materials for which there are locally established recycling markets available.

EXPECTATIONS: Supplier is encouraged to use and consume natural resources and sources of energy in an optimized and efficient way, with particular focus on implementing conservation and recycling practices in Supplier's production and maintenance processes. At all times, we encourage Supplier to adhere to the precautionary principle by, when suitable alternatives are available, substituting materials and methods posing potential environmental and health related risks. A Supplier located in an area affected by water scarcity and/or water stress is encouraged to economize and to secure existing and future access to water sources, and to seek opportunities for responsible treatment of water and wastewater discharges. Supplier is encouraged to implement a comprehensive energy reduction strategy and management program while increasing the use of renewable energy.

#### Emissions and Waste Management

REQUIREMENT: Supplier shall monitor, track and document its consumption of natural resources such as water and raw materials, as well as sources of energy in order to be able to identify aspects that Supplier can control and can influence fostering opportunities for improvement and minimized consumption. Consumption shall be monitored, tracked and documented on both the site and corporate level and provided to Fastcharge upon request.

REQUIREMENT: Supplier shall monitor, track and document its emissions to air, water and soil from its facilities and transports as well as the wastewater and solid waste generated by its operations in order to be able to identify aspects that Supplier can control and influence fostering opportunities for improvement and minimized emission. All output shall be monitored, tracked and documented on both the site and corporate level and be provided to Fastcharge upon request. Supplier shall monitor, track and document the composition of their packaging material which becomes waste at Fastcharge in order to facilitate steps towards circular economy, e.g. utilizing non-complex materials and/or materials for which there are locally established recycling markets available.

EXPECTATION: Supplier is encouraged to use and consume natural resources and sources of energy in an optimized and efficient way, with particular focus on implementing conservation and recycling practices in Supplier's production and maintenance processes. At all times, we encourage Supplier to adhere to the precautionary principle by, when suitable alternatives are available, substituting materials and methods posing potential environmental and health related risks. A Supplier located in an area affected by water scarcity and/or water stress is encouraged to economize and to secure existing and future access to water sources, and to seek opportunities for responsible treatment of water and wastewater discharges.

Supplier is encouraged to implement a comprehensive energy reduction strategy and management program while increasing the use of renewable energy.

EXPECTATION: Supplier is encouraged to routinely control, minimize and to the extent possibly eliminate greenhouse gas emissions and discharges or pollutants at the source or by other adequate measures. Supplier is also encouraged to control and treat wastewater and solid waste generated from the operations, industrial process and sanitation facilities of the Supplier prior to discharge or disposal. Moreover, Supplier is encouraged to implement a waste management strategy that targets, in order of priority: (1) prevention, (2) reduction, (3) reuse, (4) recycling, (5) energy recovery, (6) incineration without energy recovery, and (7) landfill/disposal of waste in a safe and environmentally responsible manner. Supplier is encouraged to design all packaging material in a way that facilitates a circular economy approach.

#### Hazardous Substances

REQUIREMENT: Supplier shall identify potentially hazardous substances in chemical products and articles used in its production and ensure that they are handled, transported, stored, recycled and disposed of safely. Safety information shall be available to educate, train, and protect Employees from hazardous materials and Employees shall have access to adequate personal protective equipment. We require 100% declaration of all substances used in the products delivered to Fastcharge, reported through the International Material Data System (IMDS).

EXPECTATION: Supplier is encouraged to substitute hazardous substances with those less hazardous.

## 5. Business Ethics

Fastcharge requires its Suppliers to uphold the highest standards of integrity and always operate honestly and equitably throughout their operations and business relationships. Fastcharge believes that earning business fairly and in compliance with applicable legal requirements is essential to build trust with customers and other business partners. We require our Suppliers to conduct their business in the same way, especially in the following areas.

#### Fair Competition

REQUIREMENT: Supplier shall respect and comply with all applicable fair trade, competition and anti-trust laws and regulations and shall not have any anti-competitive discussions or enter into any anticompetitive agreements, including illegal price-fixing, market sharing, customer allocation or other illegal restrictive practices, at any level of the production or distribution chain.

EXPECTATION: Supplier is encouraged to implement a corporate compliance program on fair competition applicable to all Supplier's affiliate organizations.

#### **Business Integrity**

REQUIREMENT: Supplier shall at all times uphold the highest level of integrity in all business interactions and disclose details of its corporate structure when requested by Fastcharge.

#### Conflicts of Interest

REQUIREMENT: Supplier shall do business in an open and transparent way in order to demonstrate that they are an honest and reliable partner. Further, Supplier shall conduct business in a manner that avoids situations where private, financial or other external interests conflict with the job responsibilities of the

Employee. Any situation where a Fastcharge employee or professional under contract with Fastcharge may have a personal interest of any kind in the Supplier's business or any kind of economic ties with the Supplier, must immediately be reported to Fastcharge through ordinary reporting channels.

#### Anti-Corruption

REQUIREMENT: Supplier shall not engage in, endorse nor tolerate any form of bribery or corruption, directly or indirectly. Supplier shall not offer nor accept any form of improper benefit to or from a third party, private or public, with the purpose of obtaining or retaining business or any form of preferential treatment. Such benefits may comprise not only cash but also job opportunities, favors, travel, facilitation payments, promises to pay debts or unlawful gifts and entertainment.

#### Confidentiality and Intellectual Property Rights

REQUIREMENT: Supplier shall respect Fastcharge confidential information and intellectual property rights by safeguarding against misuse, mishandling, counterfeit, theft, fraud or improper disclosure in accordance with applicable law and the contractual terms with Fastcharge.

EXPECTATION: Supplier is encouraged to implement an information management strategy, including a policy which ensures proper levels and thresholds as well as records for proper business integrity. Moreover, Supplier should implement a whistle-blower process where its Employees can anonymously raise any concerns of misconduct. Supplier is encouraged to implement an effective anti-corruption compliance program, covering a process for conducting due diligence prior to entering relationships with business partners in order to investigate and evaluate the integrity, quality, suitability and credibility of all potential business partners.

#### Data privacy

REQUIREMENT: Whenever a Supplier is entrusted with personal information about individuals, Supplier shall safeguard it and take appropriate steps to protect it from misuse. All applicable data privacy laws as well as the contractual terms with Fastcharge shall be observed when collecting, storing, using, processing or sharing personal information about individuals.

EXPECTATION: Supplier is encouraged to implement a risk evaluation process in order to identify threats to privacy, and to act upon any threats or risks identified.

## 6. Responsible Sourcing of Raw Materials

Fastcharge believes that mining and trading of minerals and raw materials can generate income, growth and prosperity and sustain livelihoods and foster local development. However, we also recognize the risk of contribution to adverse impacts such as human rights violations and conflict. Supplier shall respect all internationally recognized human rights and conduct responsible supply chain management of any materials critical to the industries in which Fastcharge operates, and in particular of those from conflict affected and high-risk areas.

REQUIREMENT: Supplier shall exercise adequate due diligence following the OECD Due Diligence Guidelines with respect to sourcing, extraction and handling of tantalum, tin, tungsten, gold, hereinafter referred to as "3TG", and cobalt and to make a reliable determination of the origin and source of such minerals. Supplier shall have a policy and process in place to ensure that any of these minerals contained in the products manufactured by the Supplier do not directly or indirectly finance or benefit armed groups that are perpetrators of human rights abuses or in any other way directly or indirectly contribute to

human rights violations. We require our Supplier to ensure that all smelters and refiners in its 3TG and cobalt supply chain take part and actively engage in third party audit programs and to provide any information on such smelters and refiners upon request to Fastcharge.

EXPECTATION: Supplier is encouraged to exercise adequate due diligence similar to 3TG and cobalt for any materials and minerals contained in the products delivered by the Supplier to Fastcharge that directly or indirectly contribute to human rights and/ or environmental violations.

## 7. Implementation and Compliance

Sustainability performance as outlined by this SCoC is a key indicator in Fastcharge supplier qualification and assessment process, and accepting it is a prerequisite for doing business with us. Fastcharge verifies compliance with the Requirements and Expectations of this SCoC by means of a self-assessment questionnaire and reserves the right to conduct an on-site audit at any time, either through employees of Fastcharge or through an independent third party appointed by Fastcharge.

Lack of cooperation, failure to address violations of the Requirements of this SCoC and/or non-timely implementation of necessary corrective action plans may result in a reduction in business and, ultimately, an end to the business relationship with Fastcharge.

Any questions regarding the interpretation of this SCoC or the Fastcharge's approach to sustainability in our supply chains in general can be raised to <a href="mailto:support@fastcharge.no">support@fastcharge.no</a>.

