
Proton Motor Fuel Cell GmbH

Supplier Code of Conduct

Proton Motor Fuel Cell GmbH (Proton Motor) is aware of its responsibility as a globally acting company and the associated social responsibility. This document summarises Proton Motor's guiding principles for suppliers in accordance with internationally recognised standards and guidelines. The cooperation between Proton Motor and its suppliers is based on a culture of mutual trust and respect. Both parties agree that upholding the standards set forth herein is the foundation for a mutual, lasting and successful working relationship. Therefore, Proton Motor expects all its suppliers to comply with the principles of the United Nations Global Compact (www.unglobalcompact.org) in their activities and to conduct themselves in accordance with this Supplier Code of Conduct and stand up for these values.

Compliance with laws

Suppliers are required to comply with the applicable national laws and regulations of the countries in which they do business.

Human rights and social standards

Occupational safety

Suppliers comply with applicable health and safety legislation. All hazards and resulting health risks to which employees are exposed are adequately assessed and the necessary protective measures are taken. In addition, employees are continuously instructed in general safety regulations. Safety information and, if necessary, appropriate personal protective equipment are available.

No child, forced or compulsory labour

Suppliers shall prohibit and refrain from any form of child labour in their businesses. Likewise, suppliers must not permit or participate in any form of forced labour, including modern slavery or human trafficking in their companies. The supplier shall ensure that no child labour, forced labour or compulsory labour is tolerated at its (sub-) suppliers either.

Respect for the fundamental rights of workers

Suppliers shall comply with the basic labour rights of the respective applicable national legislation and recognise the core labour standards of the International Labour Organisation (ILO) (www.ilo.org), considering the laws and legal forms applicable in the various countries and locations.

The suppliers

- respect the health, safety and personal rights of their employees.
- promote equal opportunities and equal treatment.
- prohibit any form of discrimination based on ethnicity, nationality, gender, skin colour, cultural background, race, age, disability, political views, religious beliefs or sexual orientation. The prohibition of discrimination in the workplace also applies to recruitment, remuneration, promotion or dismissal.
- comply with the applicable national legislation on working time.
- pay their employees remuneration that is in accordance with the applicable national laws.

- respect the rights of employees to form employee representatives and to bargain collectively in accordance with national legislation.

High risk minerals

Suppliers and partners shall take appropriate steps to identify the use of high risk minerals in their supply chain, establish traceability or chain of custody to its source or processing location, and ensure risks are identified and appropriate mitigation and remediation measures are implemented up the supply chain. We expect our suppliers and partners to share relevant information on the origin of minerals and any relevant assessments upon request. We expect our suppliers and partners to publicly disclose their due diligence efforts. Suppliers and partners should strive to reduce the use of high risk minerals in their supply chains.

Behaviour in the business environment

Anti-corruption

In the context of business relations, corruption or attempted corruption of any kind, including extortion, bribery and other unlawful practices, will not be tolerated, this applies to both active and passive bribery. Corruption is any direct or indirect benefit offered, given or received with the intention or effect of influencing the decision-making process of a business partner or public official.

Avoidance of conflicts of interest

Suppliers make decisions relating to their business activities with Proton Motor exclusively based on objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or otherwise related persons or organisations, are avoided from the outset.

Fair competition

Suppliers shall behave fairly in competition and comply with all applicable national and international anti-trust laws. Suppliers shall neither participate in agreements with competitors that violate antitrust law nor abuse a possibly existing dominant market position. Suppliers shall act against illegal cartels.

Measures against money laundering

Suppliers shall refrain from any form of money laundering activities. This must also be ensured by the suppliers regarding their supply chain. Any form of terrorist financing is prohibited.

Compliance with trade laws, export controls and sanctions

Suppliers must comply with national and international sanctions, embargoes and other foreign trade restrictions established by law, as well as applicable energy trading regulations. Suppliers must also comply with all applicable national and international capital market regulations.

Protection of information and data

Suppliers are aware of the importance of information security and data protection for their company as well as for their employees and ensure effective protection in both areas.

Environmental protection

Environmental protection and resource conservation are of great importance in the context of development as well as in the manufacture, transport and disposal of products. Suppliers comply with the respective applicable national environmental laws, regulations and standards. This includes compliance with relevant international and national laws and regulations on the handling, storage and disposal of hazardous

substances and waste. Suppliers are expected to minimise environmental impacts and hazards and improve environmental protection in daily business operations. Suppliers shall minimise waste and emissions to air, soil and water, contribute to the recycling of materials and products and continuously improve resource and energy efficiency in both production processes and the handling and transport of goods.

Responsible material procurement

All suppliers processing mineral resources from conflict areas disclose the origin of the material to Proton Motor. Suppliers use only validated, conflict-free smelters and mineral sourcing refineries to manufacture their products.

Compliance with the Proton Motor Supplier Code of Conduct

Supply chain

Suppliers shall make reasonable efforts to encourage their own suppliers and subcontractors to comply with the principles of this Proton Motor Code of Conduct.

Proton Motor reserves the right to use any of the following methods to verify compliance with this Code of Conduct by existing and new suppliers: Self-disclosure, third party disclosure, submission of certificates and permission to demonstrate compliance with the Supplier Code of Conduct through on-site audits. In the event of a breach of this Code of Conduct that lies within the suppliers' area of responsibility and that affects the interests of Proton Motor, the respective supplier is obliged to report this breach to Proton Motor without delay.

Furthermore, Proton Motor has the right to terminate without notice individual or all contractual relationships with suppliers who demonstrably do not comply with this Code of Conduct, who refuse information or audit requests or who do not strive for and implement improvement measures, after they have been given a reasonable period to do so by Proton Motor. In this context, Proton Motor will evaluate and assess the nature and extent of the cooperation with the suppliers concerned when analysing the respective violation.

Puchheim, September 2023

Proton Motor Fuel Cell GmbH
Benzstraße 7
82178 Puchheim