



KEMPOWER

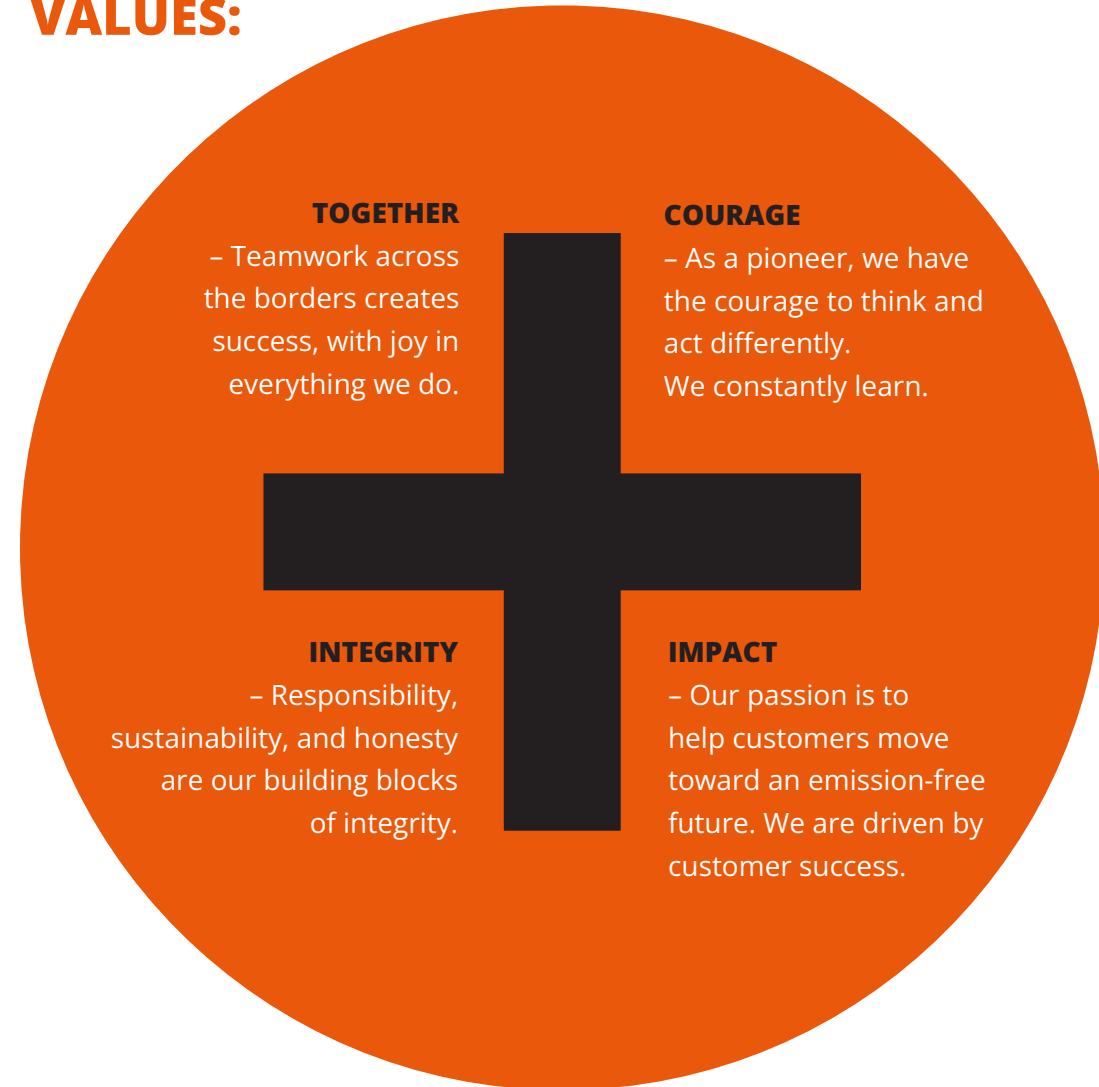
- CODE OF CONDUCT

+ KEMPOWER

THE PURPOSE OF THE CODE OF CONDUCT

The Code of Conduct includes the operating principles every employee of Kempower must comply around the organisation. Everyone must ensure that they understand how the Code of Conduct applies to their jobs and act accordingly. This Code of Conduct has been written based on the values that guide our everyday operations: together, courage, integrity and impact. The Code of Conduct translates our values as a part of day to day operations and decision making. We also expect our business partners to comply with the Code of Conduct.

KEMPOWER VALUES:



SUSTAINABILITY IS THE BASIS OF OUR BUSINESS

The ethical culture and doing the right thing are part of our operations. The ethical culture and sustainability are also the differentiators for our business when operating in global markets in different continents.

Making sustainable choices is at the core of our electric charging business, including our people. By doing the right thing, we strengthen our customers' and shareholders' trust in us, achieve success in building long-term partnerships, create value for our shareholders and maintaining as an attractive workplace for people.

1. WE COMPLY WITH THE LAWS AND PRINCIPLES OF ETHICAL BUSINESS CONDUCT

We always operate according to the laws and regulations applicable to our business. In addition to complying with applicable legislation, we follow generally recognized ethical standards. We also expect our business partners and suppliers to share our ethical standards and to comply with them.

2. WE RESPECT PRIVACY

We respect the privacy and protection of personal data, whether it is that of employees, business partners, job seekers or customers. We collect, process and store personal data only for consented purposes in accordance with applicable laws. The implementation of data protection within Kempower is the responsibility of everyone working for Kempower.

3. WE ARE COMMITTED TO 100% CARBON NEUTRALITY BY 2035

Environmental impact is the cornerstone of Kempower operations and strategy while our products and services help the world towards fossil free targets through emission free mobility. Kempower is committed to transfer to 100% fossil-free electricity use by 2025 in all operations and production. Every Kempower employee considers the potential environmental impact of their daily work.

SUSTAINABILITY IN COOPERATION WITH STAKEHOLDERS

Our success is based on our highly professional employees who are committed to working with the highest integrity for the best interests of customers and Kempower in all daily situations. By creating equal, respective and fair working community, we enhance the work satisfaction of our people.

4. WE DO NOT DISCRIMINATE OR HARASS AND WE TREAT PEOPLE WITH RESPECT

We maintain a working environment in which people are appreciated and treated with respect. We do not discriminate or treat our employees or job seekers unfairly in relation to hiring, education, recruitment, promotions, salaries, compensation or other employment matters. We exercise zero tolerance with respect to sexual harassment, bullying and other forms of intimidation. We do not use or support the use of child or forced labor.

Kempower seeks to provide its employees a work environment that is free from harassment of any kind as well as any other offensive or disrespectful conduct. Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment

5. WE SUPPORT SAFETY AND WELL-BEING AT WORK

We never compromise the safety of our people. We ensure that our employees have a safe working environment that supports their well-being. In such a work environment everyone can work to their best ability. We are all responsible for promoting safety and well-being at work. The best way to do this is to follow common instructions and to promptly report any safety or security issues. In addition to physical safety, we promote the mental health and well-being of our employees.

6. WE VALUE DIVERSITY

For Kempower, diversity comprises the unique qualities of every individual: personality, lifestyle, work experience, ethnic background, sexual orientation, religion, gender, age, nationality, skills and other characteristics. Our goal is to promote the diversity of our staff when recruiting, developing and engaging our people in all organizational levels. We aim to ensure an inclusive working environment where unique qualities are valued as strengths.

7. WE RESPECT OUR EMPLOYEES' FREEDOM OF ASSOCIATION

We respect the right of our employees to associate according to the existing legislation.

8. FINANCIAL ACCOUNTING, INTERNAL CONTROLS AND AUDIT

Kempower is committed to follow applicable accounting principles and standards, to report financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with law.

SUSTAINABLE DECISION MAKING

Each of us at Kempower takes responsibility for the choices we make. The personal interests can not bypass the interest of Kempower. Our success depends on our reputation, and we are all responsible for protecting the good reputation of the Kempower. By operating transparently, openly, respectfully we ensure that Kempower remains one of the best EV charging technology companies which is respected by our partners, investors and personnel

9. WE DO NOT GIVE OR RECEIVE BRIBES

The gifts and hospitality we give and receive always support a clear business objective and are properly recorded, reasonably in kind and size, and appropriate to the nature of the business relationship. Kempower's employees are not permitted to provide or receive any gifts or hospitality that may affect their decision-making related to business operations or that have considerable personal or financial value.

10. WE AVOID CONFLICTS OF INTEREST

All decisions and business transactions must be made in the best interests of Kempower and not based on personal interests. We treat friends and relatives as any other business partners, and personal relationships with our business partners must not influence our decision-making. We need to recognize and avoid conflicts of interest and disqualify ourselves from making a decision if it includes or may include a conflict of interest. We immediately report any circumstances that may be interpreted as conflicts of interest to our supervisor and resolve the matter in the interest of the company.

11. ZERO-TOLERANCE TO CORRUPTION

Kempower takes a zero-tolerance approach to corruption and upholds all laws relevant to countering corruption in all jurisdictions in which it operates.

12. WE COMMIT TO FAIR COMPETITION

We compete honestly, fairly and in accordance with the applicable laws. All employees must comply with laws, including competition laws, regulations and internal guidelines. We respect the intellectual property and confidential information of others.

RESPONSIBILITY TOWARDS SHAREHOLDERS

A responsible way of operating also protects shareholder value. All Kempower employees are responsible for respecting the company's information, IPRs and assets in order to maintain our position as a reliable investment.

13. WE PROTECT THE ASSETS OF KEMPOWER

We must protect company assets from theft, misuse, loss, and damage. Kempower assets are physical property, such as our equipment, machinery, business premises, raw materials, components finished products, vehicles and other company assets. Company assets also include intangible assets such as confidential information, intellectual property rights (patents and trademarks) and information systems. We apply the same principles to the information entrusted to us by our customers, suppliers and other stakeholders. All employees at Kempower must secure that the confidentiality of documents, contracts, business secrets, and internal information is maintained. Information concerning the company must not be disclosed without clear grounds or purpose.

14. WE COMPLY WITH INSIDER REGULATION

Kempower employees must not use unpublished or insider information for their own personal or financial or illegally disclose insider information to anyone. We comply with Kempower's insider guidelines, insider legislation (MAR, Securities Markets Act and Rules of Nasdaq Helsinki), regulation and instructions.

15. WE DO NOT ACCEPT, ENDORSE OR SUPPORT MONEY LAUNDERING

We comply with laws and practices to prevent, detect and report money laundering, and to report any suspicious transactions.

16. WE COMMUNICATE RESPONSIBLY

We comply always our Disclosure Policy and we maintain high quality in financial and other communications. As a listed company, we are obliged to notify, without delay, any events that may have an impact on the company's share value (insider information). Kempower do not comment on any confidential business transactions, competitors' affairs, customer relations, contracts or any customer operations without prior consent of the customer.

17. WE DO NOT SPONSOR POLITICAL ACTIVITIES

Kempower does not sponsor political parties or organizations including the funding election campaigns of individual candidates.

COMPLIANCE AND MONITORING OF THE CODE OF CONDUCT

Kempower's management team and managers of Kempower are responsible for implementing and communicating the Code of Conduct. Each Kempower employee is personally responsible for complying with the Code of Conduct in their daily work. Kempower's management team and managers of Kempower are responsible for compliance of Code of Conduct in daily work and monitoring its compliance.

We encourage our employees to contact their supervisors, management or other persons responsible, such as the administration department, in unclear situations.

Any violation of the Code of Conduct or suspicion thereof must be reported to supervisors or the CFO, or through the anonymous whistleblowing channel.

Any violation of the Code of Conduct, or failure to report a violation, may lead to disciplinary action. Reports made in good faith will not lead to adverse consequences for the informer. All reports made in good faith concerning violations of the Code of Conduct will be investigated thoroughly and fairly with the assistance of the appropriate internal or external party. Reports of potential violations will be processed confidentially and anonymously.

Kempower's Board of Directors has approved The Code of Conduct. The Code of Conduct will be updated, if required

EVERY KEMPOWER EMPLOYEE IS EXPECTED TO DO THE FOLLOWING

- Familiarize yourself with this Code of Conduct and fully comply with it.
- Be transparent in your decision making and actions.
- Not to use your position, company property or contracts for your own benefit.
- Raise your concerns about actions that violate the Code of Conduct and internal guidelines.
- Make sure that your work performance is not impaired by, for example, alcohol or drugs.
- Ask your supervisor or Kempower's legal advisor for advice if you are not sure how to act.
- Report any violation or suspected violations of the Code of Conduct to CFO or through the anonymous whistleblowing channel

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KEMPOWER'S MANAGEMENT AND SUPERVISOR ARE EXPECTED TO:

In addition to the previous,

- Show example.
- Promote an atmosphere in which your team members feel free to express their concerns.
- Discuss the Code of Conduct with your team, especially the sections relevant to your daily work.
- Listen carefully, try to answer or seek an answer to questions and concerns related to the Code of Conduct. Ask for help if necessary.
- Report any violations or suspected violations of the Code of Conduct to CFO or through the anonymous whistleblowing channel

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