

SUNLIGHT
POWER IS KNOWLEDGE

Code of Conduct

April 2022



ADVANCED BATTERY
TECHNOLOGIES

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1. A Message from the Sunlight Group CEO

Dear Colleagues,

This document is the Code of Conduct of Advanced Battery Technologies S.A. It's a reflection of our commitment to operating with integrity and in full compliance with applicable legislation, across every aspect and level of our organization. And therefore, it's of the uttermost significance that we are all familiar with it and abide by its content.

At Sunlight Group, we have always upheld that responsible companies conduct business with the highest standards of corporate governance and ethical behavior. This responsibility permeates our entire Group, all of our facilities and subsidiaries, and governs our relations and interaction with customers, investors, partners, suppliers, employees, regulators and authorities.

Sunlight Group's Code of Conduct is informed by our five values: **Innovation, Agility, Integrity, Value Creation and Data-driven**. It has been drafted to guide us in preserving and fostering the company's reputation, protecting its assets and brand with our words and actions. In a nutshell, we unequivocally respect the environment and the communities in which we operate, labor and human rights, as well as cultural, ethnic and any other kind of diversity. And we categorically do not accept any kind of unlawful, unethical or inappropriate behavior.

We have all worked hard to build Sunlight Group as a company that is not only successful, but also well-respected. A company for which the way we achieve results is just as important as results themselves.

So, please dedicate a few minutes of your time to read the guidelines in this document and apply them in your daily conduct. When acting on behalf of Sunlight Group, you are representing more than yourself; you are a representative of the entire company, of all its workforce, value chain and ecosystem.



Lampros Bisalas, Sunlight Group CEO

2. Who We Are

Advanced Battery Technologies Company Profile

Advanced Battery Technologies S.A. (ABT) is a 100% subsidiary of Sunlight Group Energy Storage Systems. It was established in 2021 with the aim to trade certified batteries and energy storage systems, as well as advanced technology applications. ABT offers integrated solutions and covers energy needs in very demanding sectors, such as the defense one. The company employs staff that is highly experienced in military equipment.

ABT is headquartered in Menexedon Str. 14B, Kifissia, in a building fully compliant with the applicable regulations. It is also in the process of issuing a Facilities Security Certificate (FSC) for the premises. The company specializes

in the procurement and distribution of batteries (battery modules) for (a) submarines, (b) torpedoes, and (c) advanced technology applications. It also offers support after their installation.

The financial and commercial activities of Advanced Battery Technologies are supported by highly experienced employees. Their expertise constitutes a key factor of the company's success – particularly regarding the procurement of optimal applications for energy storage and use; support during installation and remote technical servicing; as well as focused on-site visits to supervise and optimize the installed systems.



Sunlight Group Company Profile

Leading Energy Storage Provider

The Company's parent company Sunlight Group Energy Storage Systems (Sunlight Group) is a world-leading provider of industrial and advanced energy storage solutions. A rapidly growing global business with European roots, Sunlight exports to more than 100 countries. Sunlight Group's production plant is located in Xanthi, northeastern Greece, and in the context of its international expansion and growth, two more assembly hubs have been established in Verona, Italy and North Carolina, USA. Its global growth is supported by an extensive partner export network around the world.

Sunlight Group has over 30 years of knowledge and experience in the energy sector, and its clear vision and forward-facing strategy are driven and underpinned by a commitment to technological innovation and passion for excellence. As an industry leader, we are committed to investing heavily in innovation and technology that supports transition to a carbon-free future. Sunlight Group is applying its extensive understanding of battery technologies to develop safe, cutting-edge solutions for lead-acid and lithium-ion power energy storage.



3. Our Mission, Vision & Values

Sunlight Group: Power is Knowledge

Our Mission & Vision



Our **Mission** is to **tirelessly pursue knowledge through data and insights**, turn those into innovation that serves our customers and improves people's lives.



Our **Vision** is to **power the world through knowledge**, and become a source of empowerment.

Our Values



Innovation: **Innovation** is at the heart of everything we believe in. It's a mindset that allows us to imagine a better future for all.



Agility: We want **Agility** to drive our way of working across all parts of the organization and the products we make.



Integrity: Sunlight Group aims at creating lasting relationships, built on trust, honesty and **Integrity**. Relationships in which we treat our partners and people with transparency and openness and the decisions we make are beneficial to our Company, to the institutions and to society.



Value Creation: **Value** permeates all aspects of Sunlight Group. The value we create for our customers using our products to realize their ambitions. For our shareholders who are helping fuel our business. For each and every employee within the organization, who should always feel valued. For the society which allows us to thrive.



Data Driven: Our aim is to become a knowledge-based organization. We aspire to accumulate insights and information to create better products and improve people's lives. Always driven by respect and care for all.

4. Our Code of Conduct

Why Do We Need a Code of Conduct



Sunlight Group conducts business on a global scale. And even though all the challenges you may face as a Company employee cannot be predicted and exhaustively covered, you can find inside this Code practical advice on laws and regulations, expectations, best practices and guidance on dealing with others. Overall this Code promotes:

- ✓ Integrity across our actions and relationships
- ✓ Compliance with laws, governmental directives, rules and regulations – across all areas in which we operate
- ✓ Protection of all vital proprietary and confidential information
- ✓ Respect of labor and human rights, as well as needs of employees
- ✓ Accurate, complete, fair, and timely disclosure in reports and documents
- ✓ Transparent reporting of any violations to the Code
- ✓ Accountability for adherence to the Code

Who is covered under the Code of Conduct

It does not matter what you do for the Company – you have a responsibility to use good judgment and follow our Code of Conduct, the contents of which pertain to every full-time or part-time employee of every level within the Group, all the way up to the executive suite. The Code also applies to subsidiaries and entities, in which Company either owns a majority interest or manages operations.

Contractors or consultants, who are our agents or work on our behalf or in our name for any business activity, are also required to act consistently with the Code. Moreover, our suppliers, as a condition of working with us, must share our commitment to integrity by following the principles of our Code when providing goods and services to the Group.

Please remember that nobody has the authority to engage you in behavior that violates this Code.

Acknowledgement/Acceptance of the Code

The Code is shared with and communicated to all of our people, including the Company Directors, Senior Management and employees.

A Declaration for the acknowledgement and acceptance of the Code of Conduct is executed during the onboarding process, as well as on an ongoing basis, in order to ensure that our employees are aware and accept the provisions of the Code of Conduct and comply with the relevant requirements enclosed herein.

What Do We Need To Do

Employees Responsibilities

As employees, we are all responsible – individually and collectively – for how the Company does business and the impact Sunlight Group has in the world. We pursue our Mission and enhance our Company's reputation and commitment towards sustainable development. Therefore, we should all:

- ✓ **Be ethical:** No matter how strong the pressure to achieve targets or to act in an inappropriate way, the Company's Values must never be compromised. Do not be afraid to express differences of opinion or deliver unwelcome messages – in line with the Code of Conduct.
- ✓ **Be responsible:** Incorporate the principles of the Code into your daily activities. You are responsible for safeguarding the Company's integrity. It takes only one person and one incident to damage it.
- ✓ **Be vocal:** Raise issues and speak up if something does not seem right. Raise your concerns and offer suggestions for improvement.
- ✓ **Be active:** Actively participate in trainings, read communications, use our resources, and consult when necessary to stay informed about laws, professional standards, and our policies that apply in your work.
- ✓ **Consult with others:** You are not expected to know everything, and you should consult when in doubt or if you think you or someone else might have made a mistake.

Directors and Managers responsibilities

Those with leadership roles have additional responsibilities. Regardless of your team's size or seniority, you should:

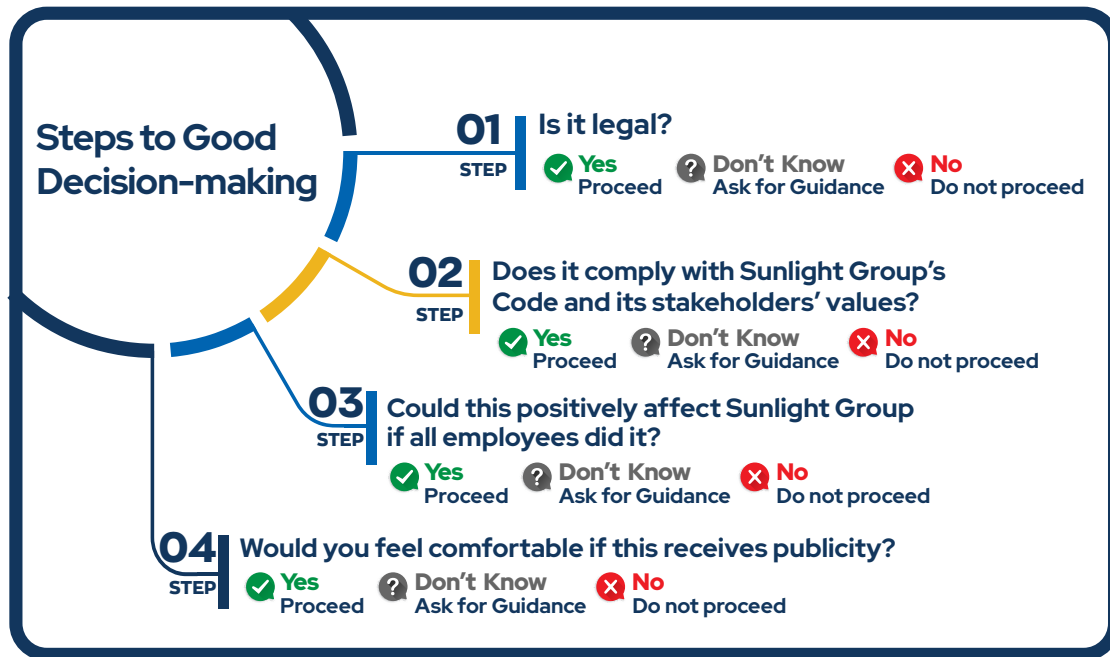
- ✓ **Be accountable:** You should be prepared to be held personally accountable for any shortcomings in your own behavior, as well as those of your team.
- ✓ **Lead by Example:** Show through your actions what it means to act with integrity and to act in accordance with the principles of the Code.
- ✓ **Support your team:** Ensure that everyone in your team understands the Code and has access to all available resources for adhering to Company Values.
- ✓ **Develop your team:** Set clear, measurable, and challenging goals that promote ethical behavior and the highest standards of client service.
- ✓ **Uphold exemplary standards:** As a leader, you should enforce the Company's standards consistently and fairly, and promote compliance with the Code among those you lead.
- ✓ **Exercise your judgment:** Respond thoughtfully and carefully to those who raise questions and concerns in good faith.

How to Make Good Decisions

The Company's Code of Conduct is not intended to address all laws, rules, policies or circumstances involving ethical conduct. We must all use common sense and good judgment in determining appropriate conduct. It is unrealistic to expect everyone to know everything, so if you find yourself in a situation where you are unsure of the ethical implications of an action, use these simple questions as a moral compass:

- Am I being fair and honest?
- Are my actions legal?
- Is this the "right" thing to do?
- Will others view my actions positively in the future?
- Do I believe that I am acting in an ethical manner?
- If my actions were reported in the news media, how would I, and the Company, be perceived?

If you still need guidance, talk to your Supervisor, Manager or to the Compliance Officer of Sunlight Group.



If you've answered YES to all the Questions, proceed!



5. Individual Conduct

Anti-Bribery & Anti-Corruption Principles



Anti-bribery & facilitation payments

Most countries have laws in place to fight corruption and prohibit bribery. A breach of such laws may result in legal and financial consequences for the Company and individuals. Even unfounded suspicions or allegations of illegal conduct could cause significant damage to the Company's reputation. Special laws apply when dealing with public officials and when conducting business with public entities.

Apart from the severe civil and criminal sanctions provided by the applicable legislation to those violating anti-corruption and anti-bribery laws, according to the Sunlight Group's Anti-Bribery & Anti-Corruption Policy any violation of the provisions described therein, entails disciplinary action.

The Company has zero tolerance when it comes to bribery and/or corruption. This approach applies to all operations of Sunlight Group, regardless of local business practices, and prohibits both public and commercial bribery (e.g. to or from any third party).

Within this context, our Company prohibits offering anything of value for the purpose of influencing or to secure any improper advantage to obtain and retain business. On the other hand, the Company provides for strict internal accounting controls to prevent concealment of bribery or other financial transactions.

Definitions

A bribe is defined as an offer or gift of anything of value or advantage that is intended to improperly influence the actions of the recipient. Bribes may include Money, Gifts, Travel or other expenses, Hospitality, Entertainment, Discounts Favors, Business or Employment Opportunities, Political or Charitable contributions or any other expenses that do not relate to the business activities of the Company or any other benefit or consideration, direct or indirect.

A facilitation payment is a small payment made to a governmental official to speed up routine government actions like processing paperwork, delivering mail, installing phones or turning the power on. Regardless of the amount, regardless of customary practices in various countries, **Sunlight Group doesn't make facilitation payments.**

Musts

Employees must:

- ✓ Always make clear, internally and when dealing with third parties, that the Company has a zero tolerance approach to bribery and corruption and will not (directly or indirectly) offer, pay, seek or accept a payment, gift or favor to improperly influence a business outcome.
- ✓ Immediately notify the Group Compliance Function, if they become aware of any suggested or actual payment or other transaction which can potentially be in breach of this Code of Conduct and the Company's Anti-Bribery & Anti-Corruption Policy.
- ✓ Be cautious while offering or accepting gifts and/or hospitality, especially when a public servant is involved; please refer to the Company's Gifts & Hospitality Policy for more details.

- ✓ Make sure that gifts and/or hospitality are allowed by the local legislation.
- ✓ Have in mind that even donations for public benefit purposes can be construed as bribery, if payments are made to facilitate a procedure or to obtain any commercial advantage; please refer to the Company's Donations & Sponsorships Policy for more details.
- ✓ In case of any doubt, please address and consult with the Group Compliance Function.

Must nots

Employees must not directly or indirectly (e.g. via suppliers, agents, distributors, consultants, lawyers, intermediaries or anyone else):

- ✗ Offer or give bribes or improper advantages (including facilitation payments) to any public official or other individual or third party, which are, or give the impression that they are, intended to influence decisions by any person about the Company.
- ✗ Request or receive bribes or improper advantages from any third party, which are, or give the impression that they may be, intended to influence decisions by the Company about that third party.

Gifts & Hospitality



The Company recognizes that gifts and/or hospitality can be important for developing business relationships with customers, suppliers, and other third parties.

What could be considered as a Gift or Hospitality

“**Gifts**” refer to anything of value **given to/received from a third party**, including personal gifts, and for which something of equal or greater value is not exchanged. Some examples would be branded items (calendars, pens), event tickets, cash or cash equivalents (including gift vouchers), or goods or services offered at a discounted rate.

“**Hospitality**” refers to the offering of meals, drinks, travel expenses, accommodation, entertainment or other similar provisions, given free of charge or with a discounted rate.

As providing/accepting gifts and/or hospitality can raise suggestions of impropriety or generate actual or perceived conflicts of interest, it is important for these relationships to remain positive and ethical, and not influenced or informed by inappropriate gifts and/or hospitality.

It is important that employees are able to assess whether a type of gift and/or hospitality, may be provided/accepted or if it is prohibited. If not prohibited, employees need to ensure that the procedure of offering/accepting gifts and hospitality is followed.

It can be difficult to tell when a gift and/or hospitality crosses the line. That is where our Sunlight Group’s Gifts & Hospitality Policy can help.

Can I ever accept or offer a gift or hospitality

Only offer a gift or hospitality, if it is:

- ✓ Seasonal or small promotional gifts (e.g. pens, calendars, notepads etc.), their value not exceeding €50.
- ✓ Hospitality, such as modest, occasional meals to maintain good relationship with a business partner, with a maximum value of €50 per person.
- ✓ Gifts of insignificant value to public officials, such as any promotional items, their value not exceeding €25.

Only accept a gift or hospitality if it is:

- ✓ Seasonal or small promotional gifts (e.g. pens, calendars, notepads etc.), their value not exceeding €50, can be retained.
- ✓ Hospitality directly linked to working arrangements, such as attendance or speaking at a conference or attending a free training course.
- ✓ Modest, occasional meals to maintain good relationships with a business partner, with a maximum value of €50 per person.

** Gifts, exceeding a value of €50 that have been received from an employee and cannot be either rejected or returned, must be reported and handed over to the Human Resources Division. The Group HR team will distribute the gifts among the Company's workforce through lottery (e.g. during the Christmas period).

In order to offer or accept any gift or hospitality, the internal approval procedure must be always followed, in accordance with the Sunlight Group's Gifts & Hospitality Policy.

Do not offer or accept any gift or hospitality, if it is:

- ✗ Given as a bribe, payoff or kickback in order to obtain or retain business or to secure an improper advantage.
- ✗ Any value of cash or a cash equivalent like a gift card or gift certificate.
- ✗ Given or received to or by public officials or their family members.
- ✗ Prohibited by law.
- ✗ A result of soliciting or requesting gifts or hospitality at any time.
- ✗ Any gift or hospitality of which the recipient knows that the giver is not permitted to give.
- ✗ Gifts or hospitality of substantial value or volume or offered frequently that may lead to conflict of interest.
- ✗ Any gift or hospitality, the offer or acceptance of which would make an individual feel uncomfortable sharing it with a Supervisor, colleagues, family or friends.
- ✗ Any gift or benefit that has to be kept secret from other colleagues, a Supervisor or manager or any other relevant parties.
- ✗ Gifts or hospitality, aiming to influence or intending to influence business decision-making processes or creating an obligation for the beneficiary to do something in return (or that could even be perceived as such).
- ✗ Given or accepted during contractual negotiations or during/shortly before a tender process with either a supplier or customer.

Examples



I was invited to dinner by a potential supplier that has submitted an offer during a tender. What should I do?



You should decline. It's inappropriate to accept any kind of hospitality (including a meal or dinner) with a supplier during an ongoing tender procedure for awarding a contract.



A supplier has sent me a gift of a high value and I don't want to offend him. What should I do?



It's important to try to give the gift back, if possible. Otherwise, you shall hand the gift to the Human Resources Division in order for it to be distributed among the Company's workforce via lottery.



I need to travel abroad at the end of the month and a visa has to be issued, as soon as possible. The Embassy's employee, responsible for addressing my request has mentioned that he can evolve the process if I pay a small amount. Is this acceptable?



No. This is considered as a facilitation payment, thus a form of bribery, which is illegal. You must decline the offer and report the incident to the Compliance Function.

Responsible Business Partnering & Building Transparent Relationships

Our relationships with our suppliers, customers, agents and other business partners must be fair, positive and productive, always based on mutual trust and respect. Building these relationships is an ongoing process and requires unwavering commitment to high standards of business conduct.

Integrity is a two-way street. Which is why the Company expects its suppliers, customers, agents, consultants and other business partners to adhere to values and principles consistent with our own, as well the content of the document at hand.

This Code of Conduct sets out the responsibilities of employees who engage with third parties and must ensure they are cooperating with business partners who share our commitment to doing what's right. And do so, by including contractual provisions in relation to compliance with our values and policies, as well as conducting audits to ensure compliance.

How the Company does business is crucial to its reputation and success and business partners should be seen as allies. In this section, there are guidelines on the appropriate conduct towards suppliers, as well as agents and consultants.

Suppliers

The Company expects fair competition in its markets and applies the same standard in dealing with suppliers. If you select and/or deal with suppliers, you should not show any favor or preference to any person or business based on anything other than the best interests of the Company. You must not let your business dealings on behalf of the Company be influenced by personal or family interests. Similarly, all purchases of goods and services for the Company must

be made objectively, based on price, quality and scope and always in accordance with the Sunlight Group's Procurement Procedure.

Agents and Consultants

Employees entrusted with selecting agents and/or consultants should select third parties after thoroughly assessing their integrity. They must ensure that these third parties are bound by appropriate contractual terms against bribery and corruption and that they comply with the Company's Code of Conduct through continuous monitoring and –if needed– updating terms of cooperation.

Commissions or fees paid to agents and consultants must be reasonable in relation to the services provided. Employees must not agree or pay commissions or fees that could be perceived as improper payments. Agreements with consultants, brokers, agents or other intermediaries shall not be used to channel payments to any person or persons, including public officials or customer employees.

Conflicts of Interest



Our people must not be engaged in activities that could affect their decisions while performing their duties or satisfy their personal interests at the expense of the Company's interests.

In this context, Company's Executives (Directors, Officers, Senior Managers), members of the Board of Directors and of the BoD Committees, shareholders and employees directly reporting to a Director, who lead a working team, are required to refrain from activities, actions or failures to act, carried out with the intention to pursue private financial interests or obtain other personal benefits.

What is considered as conflict of interest

Listing all situations or relationships which may create a conflict of interest or the appearance thereof

is not possible. Therefore, each situation must be evaluated on its particular facts. Indicatively, a conflict of interest may arise when one of the above-mentioned liable persons:

- ✗ Makes any investment or has financial participation/interest (capital, shares etc.) himself/herself or a close family member in a competing company, client, supplier or business partner of Sunlight Group.
- ✗ Participates in the Management (including Board Memberships/Directorships) or has employment relationships himself/herself or a close family member with a customer, supplier, competitor or business partner of Sunlight Group.
- ✗ Has a close relationship with a senior manager of a customer, supplier, competitor or business partner of Sunlight Group.
- ✗ Uses Company's information, assets and/or resources to his/her benefit or to the benefit of a third party.
- ✗ Negatively affects Sunlight Group reputation or its relationship with others through his/her actions.
- ✗ Engages in sideline work which detracts him/her from his/her commitment and contribution to the Company.
- ✗ Has a close relationship or has influence on the workload, performance assessment, granting of approvals and/or reward of someone with whom he/she has a close personal relationship.

- ✗ Accepts items, benefits or other gifts of significant value, given by vendors/suppliers/customers of Sunlight Group, with the intention to influence his/her judgement.
- ✗ Works in the same Department with a close family member or is currently recruited or managed by a close relative.

What you must do

- ✓ Avoid any situation that could result in a direct or indirect personal interest, which conflicts or could potentially conflict with the Company's interests.
- ✓ When an unavoidable situation creates a potential conflict of interest, declare in writing such conflict to the Sunlight Group HR Division.
- ✓ Obtain approval before engaging in any activity which may arise a potential conflict of interest, especially before proceeding with any investment, participation or employment relationship with a competing company.
- ✓ Agree on how the potential conflict will be managed or resolved by the Company.
- ✓ Whenever in doubt, you are encouraged to seek advice from Sunlight Group HR Division or Group Compliance Function to determine if a conflict exists, to accurately define the context of the specific case and to take any suitable measures to eliminate the conflict of interest. For any further information, please consult the internal Conflict of Interest Policy.

Travel & Expenses

Sunlight Group's Policy for Business Travel & Reimbursement of Expenses sets out the terms and establishes the required guidelines for the applicable travel request and reimbursement of expenses procedures, in order to effectively manage Sunlight Group's operational costs and timely update its financial controls. We aim to ensure that employees, consultants and partners follow a consistent and uniform approach when making travel arrangements. The Company expects from all those who undertake business travel to do so in the most cost-effective manner, while maintaining a level and standard that provides safety and comfort. Business trips undertaken or modified solely for self-interest are strictly prohibited. Employees are advised not to arrange business meetings and/or trips that coincide with personal time off, so as not to indirectly finance their personal travel.

Prior to any decision to take a business trip, the Company expects employees and their Supervisors to carefully evaluate the business benefit of the travel and obtain the required approvals.

Employees who will travel must ensure that they:

- ✓ have read the Policy for Business Travel & Reimbursement of Expenses
- ✓ follow the business travel approval process set out in the Policy and comply with all applicable rules
- ✓ ensure that all required travel documents are obtained in a timely manner and follow the prescribed travel instructions
- ✓ check all details relating to their travel before departure
- ✓ have activated their travel profile before travelling
- ✓ take all personal protective measures indicated by the authorities of their destination

On their part, line managers authorizing business travel must ensure that:

- ✓ employees travel is fully justified



- ✓ reservations have been made, in accordance with the procedure set out in the Policy for Business Travel & Reimbursement of Expenses
- ✓ travel has been authorized before undertaken

Sunlight Group's Policy for Business Travel & Reimbursement of Expenses also provides guidance on the reimbursement of actual and reasonable expenses incurred in the conduct of business activities or business travel. Employees must ensure that their expenses are fully justified and properly documented, submitted and approved within a reasonable time, and that they comply with the relevant Company Policy.

Business expenses are subject to regular and internal audits, therefore employees should always ensure that when submitting expenses for reimbursement such expenses fully comply with Sunlight Group's rules and that applicable approval procedure is followed. A completed expense report, explaining the business purpose of each expense, must be submitted for authorization. Failure to do so may result in delayed or declined reimbursement. Any employee who offers a business meal or dinner in the course of an external meeting with a client, must assure that it cannot reasonably be interpreted as an attempt to gain unfair business advantage. The cost of said meal or dinner should not exceed €50 per person.

6. Safeguarding our Assets



Protecting our Brand

A consistent brand identity is essential for long-term growth and success of any business. To create a clear and consistent corporate brand as Sunlight Group, all employees and subsidiaries should strictly adhere to the Corporate Communications Guidelines and Sunlight's Brand Guidelines.

Sunlight Group's brand attributes are depicted in the following brand applications:

- Sunlight Group logo
- Sunlight subsidiaries logos

- Sunlight corporate brand colors pallet
- Corporate fonts
- Corporate templates (PowerPoint, letterhead, envelope, press kit, e-mail signature, etc.)
- Corporate marketing materials (Company profile, Company website, product brochures, corporate ads, brand icons, etc.)

Protecting our Intellectual Property

The Company's intellectual property, including patents, trademarks, all kind of copyrights, details about finance and business processes and know-how rights, constitutes a valuable corporate asset, is of vital essence for Sunlight Group's operations and business conduct, and is what differentiates us from competitors.

All employees are obliged to protect these assets by:

- Ensuring all necessary checks and filings have been performed with respect to patents, designs and trademarks or other intellectual property rights, when researching, developing or preparing to launch new brands, sub brands, services, products designs, inventions.
- Not disclosing new ideas or projects externally, before procedures are in place to protect the relevant intellectual property rights.
- Making sure that non-disclosure agreements (NDAs) are in place before sending sensitive data outside of the Company.
- Making sure to have in place binding contract with appropriate clauses to protect the Company's intellectual property rights, for example when a right for use is granted to a third party and/or ensure acquiring ownership or right to use of the intellectual property that might be produced in virtue of a collaboration with a third party.
- Immediately passing all intellectual property rights queries to the Legal Division and reporting any suspected misuse or infringement of our copyrights, trademarks, patents, design rights, domain names and/or other intellectual property rights.

Likewise, all employees shall respect, protect and properly use the respective intellectual property of third parties and must not knowingly infringe the valid patents, design rights, trademarks, copyright and other intellectual property rights of any third party.

Using Company Assets Correctly

The Company's assets and resources, including its facilities, equipment, fixed assets and financial resources, are valuable and we are all obliged to protect, maintain and use them properly and in accordance with their business purpose.

All Company employees, including executives (Directors, Officers, Senior Managers), members of the Board of Directors and of the BoD Committees, should at all times be alert to avoid circumstances which could lead to deterioration, loss, improper use, damage, risk, exposure or wasting of the Company assets. They should also be ready to promptly and competently report any such circumstances occurring.

In addition, no one can remove the Company's physical assets or property from Company premises without permission, and no one can use them for inappropriate purposes.

Within this context, we are all obliged to act properly and responsibly regarding the Company's assets and resources. Also, to promptly report issues that affect the safety and security of our physical assets, including even minor cases like a malfunctioning door alarm.

Protecting our Internal Information

Information and records regarding the Company's business activity, such as business strategies, pricing information, client-lists, supplier-lists, unpublished financial results, financial data and forecasts, agreements, technology in use, expertise, know-how and any other information that affects or could affect the Company's activities, is confidential and should be protected and used exclusively for corporate purposes.

Every employee, including executives (Directors, Officers, Senior Managers), members of the Board of Directors and of the BoD Committees, need to take all

necessary measures to safeguard the confidentiality of said information and to ensure that any use or action that is contrary to its business purpose or could damage the Company's interests is prevented.

Similarly, any information communicated, either internally or to third parties, should be accurate and authorized. Especially when providing information to competent authorities, extreme caution should be demonstrated to ensure the validity and accuracy thereof.

Personal data may only be collected, processed or used insofar as it is necessary for pre-determined, clear and legitimate purposes. Moreover, personal data must be maintained in a secure manner and appropriate precautions should be taken when transmitting. The use of the data must be transparent for those concerned and the rights of those concerned must be safeguarded with regard to use and accuracy of information and to objections pertaining to blocking and deletion of information.

The Company processes personal data only to the extent that is necessary for conducting its business activities and always in accordance with the applicable legislation and internal regulations. This is the case for such information concerning its employees, executives, and members of Management or any other person directly or indirectly transacting with the Company.

What we expect employees to do to protect the Company's internal information:

- Recognize what constitutes proprietary information where your responsibilities are concerned.
- Don't divulge confidential information to anyone outside the Company or to persons within the Company who are not on a "need to know" basis.
- Do not post the Company's confidential information on internet message boards or social networking sites.

- Never discuss confidential information loudly or openly when others may be able to hear.
- Never share the Company's proprietary information with customers or suppliers without prior approval.
- Avoid the unauthorized receipt of proprietary information from others. Should you receive unauthorized proprietary information, advise the Sunlight Group's Legal Division immediately.
- Do not disclose to the Company's personnel or use for the benefit of the Company's business any confidential information in your possession as a result of prior employment with another company.
- Follow established guidelines and procedures before publishing Company-related information.
- Don't engage in corporate spying or any other illegal attempt to obtain another company's proprietary information.
- Report any instance of corporate spying, hacking, or any other such illegal activity, either against or for the Company.

Careful Use of All Types of Electronic Communications

Corporate emails shall be used only for business needs. Social media, such as blogs, wikis, Facebook, Twitter, Instagram, LinkedIn and others, have changed the ways in which we communicate – both personally and professionally. The Company understands the benefits of social media and welcomes their use. However, it also acknowledges potential reputational risks associated with reckless social media engagement. As such, Company employees engaged in social media should be familiar with and adhere to the applicable Sunlight Group's Social Media Policy and interact online in a professional manner, befitting their reputation, as well as that of the Company. Please use integrity

and common sense and treat people online with respect and dignity. In addition, be conscious of the blurred lines between personal and professional opinions online. Only share publicly available information and be transparent about your affiliation with the Company, by stating that any opinions expressed are your own and not those of the Group. We all need to understand that we are ultimately responsible for our actions in social media.

Non-authorized Company employees shall not personally comment on any aspects of the Company or any investee company to news media, including comments on public web forums or social media sites. Contact with any media (TV, newspapers, online media) is strictly the responsibility of the Company's media relations professionals and any incoming media requests should be referred to the Corporate Affairs & Sustainability Department.

Company employees shall share any draft of internal or external communication (including letters to social media or media statements, posts and press releases, event speeches, etc.) with the Sunlight Group's Corporate Affairs & Sustainability Department before any such communication is issued. Any individual engaged in such communication shall await the aforementioned Departments' approval before releasing the communication, according to the procedure established in the respective Policy & Guidelines.

Any corporate-related post on social media should be firstly published on the Company's official social media accounts, in order for the Company's members, executives, employees or any interested third parties to be able to repost and share them via their own personal social media accounts.

In addition, the following guidelines shall apply:

- Do not send chain letters or participate in the creation or transmission of unsolicited commercial e-mail ("spam") that is irrelevant to the Company's legitimate purposes.

- Do not misrepresent yourselves or the Company.
- Do not use abusive, threatening, racist, sexist, or otherwise discriminatory language.
- Do not send or receive pornographic materials.
- Inform the Sunlight Group IT department upon reception of any offensive, harassing, intimidating or unpleasant messages.

For any concern related to Company presence on social media, please contact socialmedia@sunlight.gr.

Keep Accurate Financial Records

Investors, creditors and relevant stakeholders have a legitimate interest in the Company's accounts. The integrity of these accounts depends on the accuracy, completeness and timeliness of relevant entries. All of the Company's business transactions must therefore be fully and fairly recorded in accordance with its accounting principles and other appropriate requirements. Improper or fraudulent documentation or reporting is illegal and persecuted per applicable legislation.

The Company's policy calls for maintaining accurate and complete books, records and accounts that appropriately reflect the true and fair substance of all transactions and recognition of assets. Establishing undisclosed or unrecorded accounts, or making false, misleading or incomplete entries in the Company books and records is forbidden in all circumstances. The Company prohibits the use of off-the-books accounts and requires punctual reporting and adequate recording of any financial activity, with respect to purpose, amount and other relevant factors. Invoices or payment of expenses that are unusual, excessive or inadequately substantiated must be rejected and promptly reported.

7. Compliance with Laws & Regulations



National Industrial Security Regulation (“NISR”)

Due to the nature of the Company’s operations, which include the trading of defense materials, its employees may access National Classified Information. For this reason, the Company must comply with the provisions of the National Industrial Security Regulation (“NISR”).

What is the NISR?

The NRIS is the national legislation which has been adopted for the purpose of

securing the safety of National Classified Information and Materials (“NCIM”), from the bodies that are required to have access to such information according to the provisions of NISR.

What are the measures taken by the Company for its compliance with the NISR?

The Company has undertaken the necessary measures in order to ensure its compliance with the NISR and, in particular, following measures:

- Sunlight Group’s and Company’s facilities in Kifissia and Xanthi are protected with the necessary measures and systems of natural security from

unauthorized access, comply with the security requirements of NISR, and are fully controlled to ensure that personnel of another entity do not have access to them.

- Only the employees of the Company who, based on their special tasks, have a “need to know” and have been graded by the National Security Authority, in accordance with the NISR procedure, may have access to NCIM.
- Sunlight Group maintains a valid Facilities Security Certificate (“FSC”) for its manufacturing premises in Xanthi and has undertaken the necessary actions to acquire the FSC also for its new facilities in Kifissia. The Company has undertaken all the necessary actions for the granting of its own FSC.
- The Company has appointed a Security Officer, System Security Officer, Network Security Officer and Location Security Officer, who are in charge of the development and application of security measures for the protection of NCIM.
- The Company has defined procedures and actions for the protection of NCIM in cases of emergency.
- The Company conducts frequent trainings to the personnel who deals with NCIM related to the measures that they need to undertake for its security.

What do the Company’s employees need to do?

In case an employee who has access to NCIM notices unauthorized disclosure or attempted unauthorized disclosure of NCIM, the employee must immediately inform the Security Officer of Sunlight Group.

Competition Laws

Fair competition allows for free market growth and progress. The Company acts fairly, its activities are in absolute compliance with the antitrust and fair competition applicable laws in the various countries where it operates, and avoids even the appearance of unfairly restricting another company’s ability to compete against us. As some agreements with customers, suppliers, competitors or other business partners can potentially limit free and open competition, all the Company’s

employees involved in commercial activities must make sure that they know how to apply antitrust or fair competition laws in the countries in which the Company operates.

What we expect from employees

- Carry out fair transactions with clients, suppliers and competitors.
- Don’t enter into discussions with competitors about prices, costs, profit margins, skills, availability of services, distribution channels and in general Company decisions of a strategic nature; if a discussion turns to a competitively sensitive subject, stop the conversation and immediately report the incident to Sunlight Group’s Legal Division.
- Don’t enter into agreements with competitors on fixing prices for products and services (including discounts, rebates and commissions); marketing sharing; dividing territories, markets or customers; preventing companies from entering the market; or restricting suppliers.
- Don’t enter into agreements with resellers and distributors to fix the minimum resale price of products or services.
- Don’t enter into agreements with competitors regarding their participation or non-participation in tender procedures or bids, the submission of fake offers for a pre-arranged outcome of the tender procedure.
- Don’t obtain information about the competition through espionage, bribery of third parties, fraud, electronic theft or pressure on third parties to disclose information.
- Don’t obstruct the work of the authorities in the event of a dawn raid, after first checking the search warrant and inform without delay your Supervisor and Sunlight Group’s Legal Division.

Please keep in mind that it is not always obvious who our competitors are. Some of our suppliers, customers and business partners compete with us in certain markets, and collaborate with us in others. In particular, many of our distributors are direct competitors of our own distribution channels.

Violations of the competition laws expose the Company to significant financial sanctions and damage its reputation, with potentially serious overall consequences for the Company, as well as for the employees who commit said violations.

Anti-Money Laundering

Money laundering is the process of creating or even the attempt to create the impression that either funds or other assets originate from a legitimate source by channeling them into the banking system, when in reality said funds or assets come from illegal activities such as terrorism, drugs, fraud, tax evasion and bribery. A wide variety of laws on the subject are in force in various countries or regions.

The Company is committed to conducting business in a way that prevents the use of our business transactions by those who might abuse them, so Sunlight Group fully complies with anti-money laundering laws in all countries in which it operates.

Particular diligence and care is required in order to transact with reputable new business partners who engage in legitimate activities and whose sources of funds are legitimate, so as not to risk being involved in such a process.

In case you notice a suspicious or unusual client behavior that may possibly involve money laundering, as defined above, report it to your Supervisor, the Legal Division and the Compliance Function.

What would be a red flag in spotting financial transactions that seem problematic

- Transfer of payment to/from entities or countries not related to the transaction
- Transactions processed in a way that overrides normal processes
- Payments made in cash

Similarly, when learning of any activity or transaction that considered, or even suspected, to be a money laundering case, instantly inform Sunlight Group's Credit Control, Compliance Function and Legal Division, and provide all available information concerning the particular case.

All employees shall keep in mind that the violation of these regulations, as well as the respective provisions of Sunlight Group's Anti-Corruption Policy, by the Company's management or executives and employees does not only lead to liability of a disciplinary nature but incurs also criminal sanctions and administrative penalties according to the applicable legislation.

Economic Sanctions & Trade Controls

What are Sanctions and their objectives

Sanctions are regulatory restrictions regarding certain territories, entities, groups, companies, organizations or individuals and are imposed by governments, such as the government of the United States (US) or the United Kingdom (UK), international organizations, such as the United Nations (UN), and supranational bodies, such as the European Union (EU), to control financial dealings and promote international peace and security.

Some of the most frequently imposed sanctions are:

- Embargoes
- Restrictions on admission (travel bans or prohibition of visa issuing)
- Asset freezes
- Import/export bans
- Prohibition of commercial activities for certain individuals or companies

The main objectives of sanctions are to:

- limit the adverse consequences of a situation of international concern; for example, by preventing access to military or paramilitary goods and the proliferation of weapons of mass destruction.
- penalize individuals, entities or countries with malign behavior, who breach the applicable trade and economic laws and regulations and encourage changes in their behavior by exercising pressure on them in order to achieve certain established objectives.

- support democracy, the rule of law and human rights, defending the fundamental principles of international law.

How do we protect our Company

As the Company operates worldwide and through diverse jurisdictions, we must comply with applicable economic, trade and financial laws and regulations and take all measures needed to address the risk of entering into transaction with a Sanctioned Entity or of violating relevant legislation. Breach of such laws could potentially result in reputational damage of our Company, large fines, criminal penalties of our representatives or even termination of our financing arrangements.

To this end, the following measures are taken:

- Exercising proactive due diligence of all our business partners (customers, suppliers, agents).
- Onboarding and ongoing screening of our business partners against sanctions lists to timely and effectively verify their identity and any potential relationship with sanctioned entities/countries.
- Identifying high-risk jurisdictions and any red flags during the screening process and establishment of appropriate mechanisms to mitigate potential sanctions risks.
- Checking if any consent, authorization, import or export license is required in case of transporting goods across national borders.
- Ensuring that sanctions and trade control contractual clauses are included in commercial contracts with third parties, where necessary.
- Reporting any activity or transaction considered or suspected as money laundering, terrorism financing, or other form of illegal act.
- Raising and maintaining awareness of our employees about sanctions risks via regular trainings.

- Terminating any existing or potential relationship with business partners, when violation of applicable laws and regulations is detected.

Data Protection & Privacy Laws

Sunlight Group's business activities are based on the privilege of trust. When our employees, suppliers and customers entrust us with their personal information, we make our commitment to collect, use and process this information only for legitimate business purposes, and to protect them from possible loss, misuse or disclosure.

Our Privacy Principles

Accountability

We are accountable for complying with the applicable General Data Protection legislation and adhering to the Privacy Principles, defined in our internal policies, when processing the personal data of our employees, suppliers, customers or other third parties.

Lawfulness, fairness and transparency

We guarantee that we process personal data lawfully, fairly, and in a transparent manner in relation to the data subjects.

Purpose limitation

We collect personal data only for specified, explicit and legitimate purposes and for no reason do we use them in a manner that is incompatible with those purposes.

Data minimization

We make sure that all processed data are adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

Accuracy

We apply appropriate data management practices to ensure the accuracy of the processed personal data and to keep them updated, where necessary. Every

reasonable step is taken, so that any inaccurate data is erased or rectified without delay.

Storage limitation

We retain personal data for no longer than is necessary for the purposes for which they are processed.

Integrity and confidentiality

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, use or modification, as well as against any accidental loss, destruction, or damage.

Awareness, choice and access

We inform data subjects about any potential action that may impact their privacy rights and we give them the option to make simple and meaningful choices by receiving, where appropriate, their consent to use, transfer or process their personal data; also, by allowing them to exercise their rights of

data access, update or deletion.

Privacy comes first

When we face dilemmas about protecting privacy rights or fulfilling other obligations legally imposed to the Group, we always set privacy as priority, doing our best to minimize the negative impacts that any corporate action or omission would entail for data subjects.

What do we expect from Sunlight Group employees:

- Understand how the Privacy Principles apply to your role in the Group.
- Ensure that you consider privacy factors in your day-to-day decision making and actions.
- Contact Sunlight Group's Data Protection Officer or Compliance Function before engaging in any activity involving personal data processing, when in doubt that internal privacy principles, policies and procedures are appropriately followed.

What is personal data

Personal data means any information relating to an identified or identifiable natural person. Different pieces of information that can lead to the identification of a particular person, if collated together, can also constitute personal data.

Examples of personal data

Names and surnames; email addresses; telephone numbers; ID and passport numbers; credit card information; medical information; personal opinions; Internet Protocol (IP) addresses; cookies IDs; location data.

Examples of data not considered personal data

A company registration number; a collective or general email address such as info@company.com; anonymized data, such as statistics or demographics.



8. Respect All Individuals



Diversity, Equality & Inclusion

All employment practices and decisions within our organization (i.e. related to the commencement, development, and termination of employment) are solely based on job-related factors – such as relevant qualifications, merit, efficiency, and performance. The Company rejects and reprimands any kind of discrimination, i.e. based on origin, nationality, ethnicity, skin color, appearance, religion, age, gender, parental or marital status, health, disability, sexual orientation, or beliefs of any nature.

Acting in a discriminatory manner:

- Creates feelings of mistrust and disrespect.

- Prevents the Company from attracting and retaining the most qualified employees.
- Damages the Company's brand and reputation.
- Discourages current and prospective customers and business partners.
- May result in disciplinary or legal action.

In this regard, Sunlight Group embraces Diversity, Equality and Inclusion in the workplace, and we are establishing and regularly updating appropriate programs, procedures and policies to ensure that our employees feel respected, entrusted and included, while being offered the opportunity to thrive. It is our priority to create an inclusive environment where everyone feels valued, respected, and confident.

At the Company, individuals shall always treat each other with respect, just as they wish to be treated. Different approaches of diverse employees from around the world are greatly valued, as diverse individuals bring their unique perspectives and skillsets that enforce creativity and innovation in the workplace.

It is our goal to offer equal opportunities to everyone. In this context, we promote a fair and transparent recruitment process by making all potential candidates aware of the recruitment steps, mitigating bias, and providing useful feedback.

Moreover, appropriate procedures are followed to pinpoint training needs, motivate our employees and, hence, achieve maximum employee efficiency within a professional environment, without exclusions. To this end, all employees are expected, on the one hand, to demonstrate fairness in their interactions with both colleagues and external parties and to adopt behaviors that reflect the Company's values and corporate culture of collaboration, respect, and inclusion. And also, on the other hand, not to tolerate unlawful discrimination of any kind and thus immediately report equal opportunity concerns, if any, to Sunlight Group's Human Resources Division.

Harassment, Bullying and Abuse

Respectful behaviour among Company employees and towards third parties that cooperate in any way with the Company is of the outmost importance and the guiding principle in Company employees' behavior. Respect is expressed, amongst others, through polite behavior that doesn't cause any kind of verbal (or other) harassment, bullying, or abuse or conflict in day-to-day business interaction.

In conformity to the principles of respecting human existence and dignity, non-verbal or verbal abuse of authority like bullying, violence, harassment, or

any mistreatment in the workplace coming from members of Management, executives, employees or business partners, whether addressed to another member of Management, executive, employee, business partner or third party, is not acceptable and will not be tolerated.

Any improper or unwelcome conduct, such as words, gestures or actions; any practice or threat that may cause physical, emotional or psychological, sexual or financial harm to another person, is defined as violence and harassment at the workplace.

In particular, harassment, expressly including sexual harassment, is considered to be a form of verbal or bodily behavior that aims to, or results in, offending the dignity of a person, mainly by creating an intimidating, hostile, humiliating, degrading or aggressive environment, whether or not constituting a form of discrimination. It may be caused by either a male or a female or by a person who is of the same gender as the person who is being harassed.

In light of the above, the Company strictly prohibits:

- ✘ Any kind of verbal, physical, social or psychological abuse, violence and/or harassment.
- ✘ Unwelcome sexual suggestions, requests for sexual favors and other verbal or physical harassment of a sexual nature.
- ✘ Handling and/or displaying material of a sexual nature (i.e., photographic, video or printed material).
- ✘ Forcing another to engage in sexual relationships or contact.
- ✘ Taking advantage of one's position or authority at the workplace to exercise pressure, humiliate and/or degrade their colleagues or partners.
- ✘ Jokes of a sexual content, when addressed to people who have not expressly declared the wish to be recipients of such jokes.
- ✘ Comments with explicit or implicit sexual connotations.

- ✘ Offensive remarks of any nature.
- ✘ Discriminatory or racist comments concerning origin, nationality, ethnicity, skin color, appearance, religion, age, gender, parental or marital status, health, disability, sexual orientation, or beliefs of any nature.

If anyone becomes aware of any discriminatory activity at the Company or feels that they or any other employee are the victim of sexual, verbal or other harassment (racial, religious or of any nature) or of physical or emotional violence or mistreatment, they should report it to the Contact Persons especially appointed for these purposes, namely:

- a) the Director of Sunlight Group's Human Resources Division, and
- b) the Director of Sunlight Group's Legal Affairs and Compliance Function.

The Contact Persons are responsible for providing timely and appropriate information and guidance to employees regarding any issue related to violence and harassment and sexual harassment at work, such as explaining the internal procedures for submitting and receiving complaints in the event of such incident, as well as responding to any concern about the measures taken by the Group to prevent, control, mitigate and address relevant incidents.

Company employees may come in touch with the Contact Persons to receive any information or clarification needed regarding the above issues, or to submit a violence and harassment complaint either in person, by phone or in written form. Such complaints may also be submitted via email at the following email address: speak-up@sunlight.gr (Speak Up Line).

Complaints for violence and harassment incidents at the workplace may be submitted by the complainant either anonymously or by stating their name. Each complaint will be investigated immediately and in depth by the Workplace Violence and Harassment Complaints Handling Task Force, which is responsible to handle such matters in an absolutely confidential manner, with objectivity and increased sensitivity towards the offended party and all other parties involved.

Upon completion of the complaint's investigation and based on the recommendation of the relevant Task Force, the Company shall take any measure deemed appropriate for the effective management of each case, including corrective, disciplinary or legal actions against individuals who are proved to harass, bully or abuse their authority.

All appropriate measures and procedures that the Company has put in place aim at the prevention and addressing of violence, harassment and abuse at the workplace, as well as at the efficient treatment of internal complaints concerning such incidents. As such, they are further analyzed in the Sunlight Group's Internal Employment Regulation and in the respective Policy on Preventing and Addressing Violence and Harassment at the Workplace.

Use of Substances

Abuse of alcohol, drugs and other intoxicating substances in the workplace can be a serious issue for health, safety and work performance. Members of Management, executives and employees are obliged to not use, and/or abuse, and/or be under the influence of any kind of substance like alcohol, illicit drugs, or any illegal or psychotropic substance in the course of carrying out their duties.

The use, possession, sale or offering of any alcoholic or illegal substances is prohibited during working hours in the premises of the Company, with the exception of reasonable use of alcohol in the course of specific corporate events where alcohol is offered.

Health & Safety Standards

As a conscientious employer, the Company takes all appropriate measures to eliminate or minimize any risks to the physical and psychological health and safety of employees. We regard mental health as important as physical health and aim to provide a safe workplace to our employees where they feel healthy,

happy and productive and where they find meaning in their work.

To this end, the Company expects that every business partner, employee, executive and member of Management:

- Abides by health and safety rules in their daily tasks while being in the workplace.
- Actively contributes to the prevention of accidents and/or the spread of infectious diseases.
- Immediately reports to their supervisor(s), as well as the Health and Safety Department any unsafe conditions and events that they become aware of.
- Participates in the relevant training or awareness programs.
- Is regularly informed about the guidelines in relation to the performance of their tasks, as well as about applicable legislation.

Along with all Company employees, who must contribute to these goals through their own behavior, the personnel of collaborating third parties bear the same responsibility while at the Company premises, and must all strictly adhere to the applicable health and safety rules, without side-tracking or compromises.

Equally, we encourage our employees to openly discuss workplace mental health problems like issues causing stress or anxiety with their supervisors, the Sunlight Group HR Division or the Occupational Physician in the same way as they talk about safety, performance and productivity in the workplace.

We always aim to develop programs in support of our employees' wellness and shape a culture that promotes healthy behaviors and overall wellbeing.

Suitable Working Conditions

The Company is committed to creating and maintaining a working environment that is based on trust, dialogue and mutual respect, and protects the well-being and work-life balance of its employees.

To this end, Sunlight Group ensures for every employee, executive and member

of Management more than decent wages and the legally required allowances, while strictly abiding by the applicable national rules concerning working hours, working breaks, overtime pay and leaves. In addition, excellent performance and efficiency are highly appreciated and accordingly rewarded.

Great attention is paid to the respect of the special working rights of parents of any gender, including parents of adoptive children and parents through procedure of surrogacy or any form of medically assisted reproduction methods, as well as the rights of caretakers, so that the latter are able to enjoy work and family life balance.

Upon agreement with the employees or where serious reasons of health impose it, remote working is also a possible working option. The Company guarantees that employees working from home are treated equally to those working on site with physical presence and that both share the same rights and responsibilities.

Child & Compulsory Labor

The Company adheres to all applicable laws regarding the age thresholds in the recruitment of employees and especially prohibits the employment of minors under 18 years of age. In this context, we demonstrate zero tolerance on child labor incidents and conditions across the entire range of our activity, rejecting any kind of children misuse and mistreatment.

Furthermore, fully respecting human dignity and freedom, the Company takes all necessary measures to prevent any incident or direct or indirect involvement in any form of forced or compulsory labor and trafficking in human beings or any other action internationally defined as Modern Slavery.

Preventing Conflicts & Human Rights Abuses

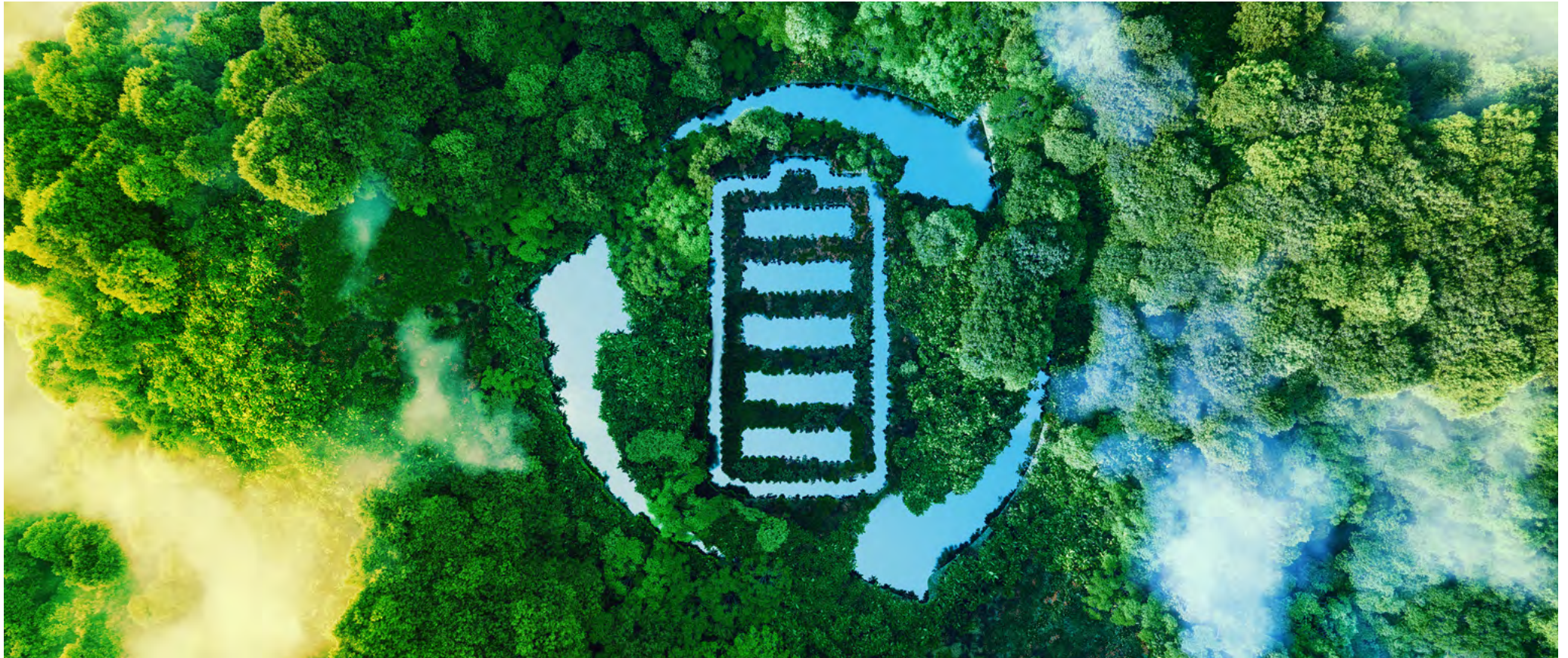
The Company has a responsibility to respect human rights and not contribute to conflict, nor by any means profit from, or contribute to, any forms of torture, inhumane treatment, gross human rights violations or other serious violations of international humanitarian law, crimes against humanity or genocide.

Taking into consideration that human right infringements are common in resource-rich conflict-affected and high-risk areas, where extraction and trade of minerals may result in financing armed groups and/or supporting the outbreak or continuation of conflicts, it is crucial for the Company to impose trade controls, that will ensure its supply chain transparency.

To achieve the above aim, the Company adopts all necessary measures and procedures to prevent and address the risk of being in any means involved in importing, exporting or trading metals and minerals –and particularly of those containing or consisting of tin, tantalum, tungsten, their ores or gold (3TGs)– that come from conflict-affected and high-risk areas, without having been verified as “Conflict-free.” In this respect, a Due Diligence process is implemented for all our suppliers and business partners who trade such minerals, while appropriate management and reporting systems are developed, as described in detail in the relevant Conflict Minerals Policy.



9. We Care for the Environment & the Community



We Protect the Environment

Protecting the environment and conserving natural resources are high priorities for the Company and an integral part of its activities. Through both management leadership and employee commitment, Sunlight Group strives to conduct its operations in an environmentally safe manner and at all times seeks to improve its environmental performance.

Starting with the product development stage, environmentally compatible design, technical safety and health protection are fixed as targets. Moreover, the departments involved are frequently notified on environmental legislation updates, so to ensure that they are at all times in a position to comply with new requirements.

Important Information & Practical Tips

- All Sunlight Group facilities must comply with state and local environmental laws regulating pollutants, as well as the handling and disposal of waste.
- Management in each Sunlight Group location must ensure that all facilities/assets have access to applicable Sunlight Group's manuals, codes, regulations, and standards.
- You are responsible for the health and safety of all individuals under your supervision and for the safety of Sunlight equipment and property under your control.
- All Sunlight Group personnel have the authority to stop work to remove a hazardous or unsafe condition without fear of reprisal.
- Observe all Sunlight rules and regulations and report any unsafe or hazardous conditions immediately to your Supervisor or site safety personnel.
- Contact Sunlight Group's Compliance Officer to report situations not resolved through safety reporting channels or submit an anonymous report.
- Avoid activities that may lead to illegal emissions or discharges and promptly respond to environmental incidents.
- Handle and dispose of all hazardous wastes in the manner required by law.
- Ensure that subcontractors and vendors at work on Sunlight premises comply with all applicable laws, statutes and regulations governing the particular facility or asset, including any additional requirements imposed by Sunlight Group.
- Reduce risk and ensure proper safety and environmental control by using bid qualification criteria and performance requirements to select capable and responsible subcontractors.

We Follow a Sustainable Development Path

The principle of Sustainable Development constitutes a central choice and pursuit of Sunlight Group. This is not solely as a means of expressing our corporate responsibility. It also forms the basis on which our decisions are made. Decisions aimed at the continuous improvement of our environmental performance and our competitiveness, sustainability-wise, in the energy storage market.

Our aim and purpose is to achieve development that satisfies current needs, without compromising those of future generations. Within this context, Sunlight Group conducts business steadily and systematically:

- by applying financially, environmentally, and socially beneficial methods and practices.
- by using production methods and procedures focused on conserving natural resources and energy, limiting emissions, recycling, and optimally managing waste.
- by modernizing production methods and procedures, in accordance with European and international standards.
- by training employees and evaluating their compliance with sustainable development principles.

Every employee, executive, member of Management, subcontractor and, generally, every person who cooperates in any way with Sunlight Group, is under the obligation to abide by and apply the principles for Sustainable Development, as well as to report to the appropriate authority, any behavior that jeopardizes Sunlight Group and its business and social contiguous.

Donations & Sponsorships

The Company is in the process of drafting a proactive and ongoing strategy and action plan in order to support the needs of the communities it lives and thrives in, with a focus on the areas defined according to its ESG/Sustainability Strategy.

Donations & Sponsorships are managed and coordinated by the Corporate Affairs & Sustainability Department, according to the Group's strategy and focus areas.

To direct the impact of Donations & Sponsorships, the Group's companies focus their resources on projects that fall under the below objectives:

- Improving the quality of life of local communities
- Supporting education and training activities or initiatives
- Supporting health, emergency, and rescue services

The Company approves the annual budget for sponsorships and/or donations. An approval line process is formally established for any ad hoc requests for donations, exceeding the budget or in case of unexpected events.

The Company shall assess the needs of the local communities and identify the subsequent needs for Donations & Sponsorships, beneficiaries, and the goods to be donated.

Donations & Sponsorships provided by the Group's companies must be reasonable and compatible with the Company's values and strategy, as defined in the Anti-Bribery & Corruption Policy and the Code of Conduct.

Prior to the execution of Donations & Sponsorships, the Company must apply due diligence measures (indicatively background checks of the beneficiary or recipient) regarding the beneficiary/recipient of the donation/sponsorship, in order to avoid any irregularities, in accordance with the Donations & Sponsorships Policy.

Proper internal approval and accounting procedures shall be followed and complete and accurate records shall be maintained for all Donations & Sponsorships, (including invoices, donation approvals and certificates, acceptance and acknowledgement letters as provided by the recipients/ beneficiaries of the donation, etc.), for clarity and transparency purposes, according to the Donations & Sponsorships Policy and in coordination with the Group's Corporate Communications and Sustainability Department.

Tax exemptions procedures shall be applied in accordance with the applicable regulatory framework, in order to succeed in tax compliance.

Any form of Donations & Sponsorships to political parties, government or public officials, either directly or indirectly, are strictly prohibited.



10. Speak Up

Non-compliance with this Code of Conduct and other Company Policies constitutes infringement, which may result in sanctions to not only the infringing person but possibly the Company as well.

For the effective implementation of this Code and other Group Policies, and in order to safeguard the interests of both the Company and its employees, interested parties are encouraged to report to the Compliance Function and/or Human Resources Division every and any misconduct and behavior that may deviate from or be incompatible with the law, this Code, Company Policies or other internal regulations.

The report may refer to any behavior which you suspect to be unethical, unlawful or criminal. This could be bribery, fraud, price fixing, a breach of data process, an abuse of our systems or policies. It could also be violence, bullying or harassment at the workplace, a conflict of interest, danger to the health and safety of employees, potential abuses of human rights or serious environmental issues.

Not only our employees are entitled to raise their voices and report any concern, but also any third party maintaining a business relationship with the Company, such as our suppliers, customers, agents, contractors and joint ventures collaborators.

How do I speak up

If you know of, or have a good reason to suspect, a violation of the Code of Conduct, the Company's guidelines or applicable laws, you may submit your report confidentially and anonymously, if thus chosen, via any of the following ways:

- By letter
- By email to the account speak-up@sunlight.gr
- Via telephone
- Via in person conversations with your Director, the Group Compliance Officer or the Group/Local HR Director

What's next

All reports will be investigated in accordance with Sunlight's Whistleblowing Policy, in an absolutely confidential and objective manner. Specifically:

1. Your report will be classified, based on its topic, and then respectively assigned to a competent impartial internal team to be investigated.
2. The competent team will contact you to confirm receiving your report and ask for further information or clarifications – if needed.
3. The competent team will investigate the matter and keep you updated about any progress made.

4. The competent team will inform you about the outcome of the investigation. In case of any infringement detected, Sunlight Group will take, at its sole discretion, the necessary measures to handle the case, including initiating disciplinary action against the infringer or even terminating its business or working relationship with the latter.
5. Records of every report received will be kept in accordance with the legally provided confidentiality requirements.

Our Company guarantees a non-retaliation policy against any individual who reports information concerning potential violations in good faith, or who participates in any investigation or proceeding by the Company or any Authorities, should it be requested, unless the information provided is found to be intentionally false.

The Company is committed to taking all necessary measures to keep the identity of the person(s) submitting the report, and all information concerning their complaint confidential, and will only disclose information on a need-to-know basis, when permitted or required by applicable law.

11. Violation of the Code of Conduct

The present Code of Conduct is a legally binding document, applicable to all Company's employees and third parties (e.g., suppliers, customers, agents), collaborating with Sunlight Group.

Non-compliance with the rules of this Code is regarded as misconduct and may incur for the employee concerned –irrespective of their position in the management hierarchy and depending on the severity of the violation– disciplinary sanctions (e.g., reprimand, imposition of a fine, suspension from professional activity for a few days etc.), in accordance with the applicable laws, the Internal Working Regulation and the relevant corporate procedures.

Furthermore, any violation of the Code by a third party, based on its severity, gives the unilateral right to the Company to immediately terminate its business relationship with the party concerned, in compliance with the applicable contractual terms governing their collaboration.



GREECE | ITALY | ROMANIA | USA

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