



MANUAL DOCUMENT

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PURPOSE:	A guide to EVA Global’s code of business conduct both as supplier and as a contractor of services

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A MESSAGE FROM OUR LEADERSHIP TEAM

EVA Global’s Code of Business Conduct (hereinafter referred to as the “Code of Conduct”) serves as our ethical commitment as a supplier ourselves and for all our suppliers to consider as a means to carry out good business for all company stakeholders. It is absolutely essential that we have in place effective tools and resources, including our code of business conduct that clearly communicates our standards and our expectations.

EVA is fully committed to compliance, carrying out all activities legally, ethically, and transparently. Upholding exacting standards in all aspects of our activity is fundamental to our goal of having a positive impact in all the communities we serve. EVA Global was founded to build trust in eMobility, accelerate the adoption of electric cars and help drivers who have chosen to take part in the sustainable transport revolution. Progressive social and environmental impact is at the core of all business activity. We do this in a responsible and sustainable manner. We also count on everyone on our team to use good judgement and seek opinions and interpretation of how to implement our practices in a way that will allow us to do what is right.

We understand the success of our business is based on the trust we have earned from our employees, customers, and shareholders. We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical structuring and performance.

This Code applies to all companies, individuals or any other business partners who provide their products or services to EVA Global. As a company, we request that our suppliers in the supply chain accept the main tenets of the same.

EVA Global reserves the right to assess and review the risk of non-compliance in regard to ethics and the company Code of Business Conduct in any part of its own business and in any of its supply chains. Considering any such risk assessments, it may seek specific reassurances from its suppliers and other business partners to establish an agreed timeframe to change undesirable practices.

HOW TO USE OUR CODE

Situations involving ethics and values can be complicated. Certain situations require reflection and thought about our processes in order to come up with the right action. We believe our code can be used as a resource to help us provide the best possible service and help our suppliers to understand our standards and expectations and to make the correct decisions when necessary. Our code applies to every business partner and third parties that act as an extension of our organization, whose behaviour can have a direct impact on our reputation and how we are perceived. For this reason, we only work with business partners and suppliers who share our commitment to ethics and compliance and doing a job well. The expectation is that all our employees, and our partners and their employees, will act in a way which is consistent with this code. Contracts that we enter into reflect the trust that we have in our partners/ suppliers and in how business should be conducted. Not meeting our standards will jeopardize our business relations.

To meet the responsibilities of this code we ask the following of our business partners/ Suppliers:

- ◆ Act in a professional, honest and responsible manner
- ◆ Familiarize yourself with the information in the code as well as applicable laws and company policies where applicable
- ◆ Report concerns about possible violations of this code or regulations that are applicable to our company. A platform is available for this and open to both our team and our business partners upon application.

- ◆ Be a role model in terms of ethical leadership and support the code!

The Code should be read in conjunction with all policies referenced and which will be made available to our suppliers on request.

THE LIVING FABRIC OF OUR BUSINESS PROPOSITION – VALUES

Our values are the living fabric of our working environment and business culture. At EVA Global we are committed to matching or exceeding what our clients do well. We believe that we have the opportunity to make a huge difference to our end users through excellence in our processes and how we channel those processes in the right way and reflecting the right values.

TRUST LEARNING SUSTAINABILITY RESPONSIBILITY RESPECT



SUPPLIERS AND LEADERSHIP

What expectations do we hold regarding the supply chain and our suppliers?

Communication between so many different cultures and backgrounds means that how we share our message matters. Without communication there is no involvement, no collaboration with other parties!

Commitment begins with **trust** in each other. As a trusted partner we add value and receive value from our business partners and suppliers. We understand our business and our partners' business and the solutions that are needed.

Our leaders expect their vision to be shared. We evolve a shared vision that starts with our leadership and is actioned by our team to achieve measurable results that go on to create more

opportunity and more value. We expect our leadership and managers to understand when and how to talk with our suppliers. Mistakes should be seen as opportunities to advance while a job done well deserves credit!

Decision-making requires diligence and collaborative effort. Involvement reduces buy-in to zero in the knowledge that the decision will be based on a balance between what is best for our clients and for EVA Global, and of course for our suppliers when cascading down in the EVA Global supply chain.

BEST PRACTICE

EVA Global occupies a unique position in the mobility industry. As the leading managed services provider, we have the responsibility to not just meet but to exceed best practices with regard to the standards that guide us.

By centering on best practice, and as we grow, we impact millions of end users, while at the same time fomenting our own outstanding work culture. This culture will support our values while meeting our business goals. Not only do our clients demand this but we also look for best practice and efficient solutions in our suppliers.

One area of particular concern is that of data. We therefore take extraordinary precautions to ensure we follow and build on best practice in information security, risk management and business continuity.

EVA Global's certifications currently include:

ISO 27001 – is the accepted global benchmark for demonstrating the adherence of the information security system to best practice. Effective March 2022.

ISO 22301 – EVA Global has become certified in this global benchmark, developing an effective business continuity plan for the company. Effective in March 2022.

Current projects leading to certification in 2023:

ISO 27701 – Data Privacy Extension to ISO 27001

ISO 27035 – Infosec Incident Management – Extension to ISO 27001

OUR COMMITMENT TO INTERNATIONAL PRINCIPLES

EVA Global's Code of Business Conduct serves to remind us of our commitment to our suppliers and clients and also supplier communities in many different geographical areas of the world and the impact we have on them. To follow our code implies the certain knowledge that our operations and services are carried out in a socially responsible manner. EVA Global's Code of Business Conduct is based on and committed to supporting and promoting international principles and indicators such as:

- ◆ UN Global Compact and Sustainable Development Goals
- ◆ UN Universal Declaration of Human Rights
- ◆ UN Guiding Principles on Business and Human Rights
- ◆ ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work
- ◆ Minimum Wage Levels in the Country of Hire
- ◆ ILO Decent Work Agenda
- ◆ Human Development Index of the United Nations

BUSINESS PRINCIPLES

As an EVA Global supplier, EVA Global requests compliance with all applicable laws and regulations. In all daily business practices; as the company acts in accordance with the highest standards of business ethics and integrity, our suppliers are to be compliant in the same areas. Our suppliers will be requested to acknowledge a corporate social responsibility commitment by adhering to the following areas of practice and signing a binding supplier declaration form to that effect.

Areas of practice:

- ◆ Financial responsibility including tax compliance, liability coverage and compliance regarding financial record-keeping/accuracy in company records
- ◆ Owner integrity before the EU (European Union), UN, and specifically in relation to the laws and government entities of Finland, Spain, Portugal, Germany, the Netherlands, Malaysia, Costa Rica and the USA
- ◆ Corruption and Anti-bribery compliance (See Policy)
- ◆ Anti-money Laundering and combatting the Financing of Terrorism (See Policy)
- ◆ Freedom of Association (See Policy)
- ◆ Ethical recruiting
- ◆ Modern Slavery and Human Trafficking (See Policy)
- ◆ Supply Chain Responsibility and Sustainability (See Policy)
- ◆ Health and Safety Compliance (See OSH Policy)
- ◆ Data Privacy (See Policy)
- ◆ Data Protection and Data Security (See Policy)
- ◆ Intellectual Property Rights (See Policy)
- ◆ Child Labour (See Policy)
- ◆ Compliance with Competition Legislation
- ◆ Conflict of Interest and Outside Employment (See Policy)
- ◆ Human Rights and Working Conditions (see policy)
- ◆ Protection of the Environment – including GHG emissions, use of renewable energy, decarbonisation, waste reduction, reuse and recycling, noise emission and immission (See Environmental Practice Policy)
- ◆ Equal Opportunities, Diversity and Inclusion (including Rights of Minorities and Indigenous Peoples)
- ◆ Use of Private or Public Security Forces (see policy on Human Rights and Working Conditions)
- ◆ Land, Forest, and Water Rights and Forced Eviction (See Human Rights and Working Conditions Policy)

We are committed to full compliance with all applicable local, national, and international laws and regulations. To be in compliance, and where necessary, we avail ourselves of the best available expert opinion and interpretation of those laws and regulations.

EVA Global expects all employees to conduct business according to the highest ethical standards of conduct. Business dealings or business relationships that create or appear to create a conflict between the legitimate business interests of the Company and an employee are unacceptable. The Company recognizes the right of the employee to engage in activities outside of their employment which are of a private nature, non-remunerated and unrelated to Company business as long as such activities do not interfere or otherwise conflict with the employee's work obligations to the Company. However, the employee must disclose any possible legitimate business conflicts so that the company may assess and prevent possible conflicts of interest from arising.

Integrity implies respect for laws and regulations and no disrespect of the same is acceptable. In terms of business practice, we pursue transparency in operations and in our dealings with our clients. We do not allow any misconduct or violation of fairness in any tendering process. We refrain from damaging the reputation of any business partner and any behaviour that harms a competitor's creditability. We provide our stakeholders with information on our status and performance transparently and openly, without preference and without favouring any client over another or individual over another, promoting a culture of transparency in the workplace.

Financial responsibility includes proactive oversight of all insurance policies/cover that our industry requires, especially in the areas of data security, and data protection cover. Fiscal responsibility requires vigilance regarding transparency and accuracy in the data recorded.

We do not hold back maliciously, unlawfully, or unduly, payments towards our partners, and we do not allow such practices in our supply chain, we fight the unethical practice of debt chain.

Our employees are responsible for ensuring fair business during their professional activities and adhere to every competition, consumer protection and fair marketing rule. Customers and business partners shall be treated fairly and equally, products and services shall be displayed in a manner that is fair and accurate (fair marketing and advertising) and adhere to the disclosure of all relevant information transparently. In this regard and where providing field services for charging station hardware/software functions, EVA Global will work with our clients to report the use of non- bona fide parts/ non-standard spare parts by any supplier in our supply chain, thereby minimizing risk during the material purchasing process.

Eva Global is attentive to the need to protect and respect the intellectual property rights of our clients. We apply the same protection to EVA Global's intellectual property and do not allow unauthorized access to it. Safeguards are in place to minimize the risk of loss, theft or misuse of our physical assets, confidential information, information systems and EVA Global technology. In the course of providing services to our clients, we may need to disclose personal information – agreement through non-disclosure agreements is required before any business contact can take place.

Training in data protection for our personnel ensures minimal risk in terms of violation of data privacy or misuse of data. Training in data protection considers the regulations for all geographical areas served by EVA Global. Data protection schedules are compiled for all our clients and agreed with all our clients. We survey our suppliers to ensure that our supply chain is at the same standard of protection.

We are responsible for the security, protection, and the economic use of company resources. Our resources, including time, material, equipment, and information are provided for legitimate business use(s) only.

All suppliers are obliged to follow appropriate security measures as stated in the data protection agreement between the supplier and EVA Global.

Compliance with Competition Legislation

One of the core EVA Global Principles is to maintain high ethical standards while abiding by local, national, and international laws.

As a company with operations in numerous cities throughout the world, EVA Global is committed to adhering to the laws and regulations in effect in the various countries in which it works, as well as to implementing high standards of integrity in business transactions. These rules, regulations, and standards include EU competition law, US antitrust law, and any applicable local competition legislation.

Each employee must be provided with sufficient information about competition laws to recognize situations that require reporting a non-compliance with EVA Global Competition rules, so that when the employee believes in good faith that there is a violation of laws and regulations of competition, the employee must immediately report the matter to the manager, the Law Department or the Chief Compliance Officer.

EU competition law

EVA Global complies with European Union Competition Law, which is the competition law in effect in the European Union and aims to promote the maintenance of competition in the European Single Market, and regulating the anti-competitive behavior of companies.

EVA Global conforms to the current set of competition laws and regulations as well as Articles 101 to 109 of the Treaty on the Functioning of the European Union (TFEU), which serve as the main sources of European competition law.

The requirement to abide by European competition laws serves to safeguard and promote effective operation in a free market, preserving competition between EVA Global and businesses engaged in comparable forms of trade. Competition laws therefore forbid agreements, practices, and behavior that have a negative impact on competition, such as agreements across competitors or abuse of market power, which may reduce business efficiency, limit innovation and technical development, and result in higher prices, lower quality products, or decreased production on the market. EVA Global abides by the guiding principles that served as the foundation for the law, despite the fact that the scope and content of competition laws may

differ from country to region that prohibition of anticompetitive agreements, practices, abuse of a dominant position or substantial market power.

US Antitrust law

EVA Global is dedicated to abiding by antitrust and competition laws that are relevant to our international businesses since it thrives in markets that are competitive.

While antitrust and competition laws can be complex and their requirements can differ by region or territory, it is critical that all EVA Global employees follow the rules of competition and ensure that every member of the EVA Global team is cost-effective. dealings, profit margins, customers, territories or markets, market shares, salaries, hiring or recruiting personnel, business plans or strategies, or any other aspect of the sale or purchase of goods or services and hold any commercially sensitive information about the EVA Global privately and do not disclose it to a rival—current or potential—either directly or through a third party or vendor.

Due to EVA Global's global business operations, every employee, regardless of where they are located, are required to abide by local competition laws in countries where the intended business transaction will have an impact, as well as EU competition law and US antitrust regulations.

OCCUPATIONAL SAFETY

At EVA Global we provide clean, safe, and healthy work conditions at all our sites and we are dedicated to maintaining a healthy, balanced working environment. We are committed to minimizing the impact on the natural environment in all our operations and activities, both inside and outside our office locations. We make efforts to reduce the use of finite resources.

We request that our suppliers follow and comply with every relevant health, safety and environmental protection law, regulation, and rules at all times. Occupational safety plans are available for all our centres and supplier workplaces. Emergency evacuation plans are in place

and all employees are required to complete risk prevention and health and safety training at their places of work.

Where Supplier employees carry out site visits, all relevant safety procedures for the site are identified and subject to monitoring procedures and in collaboration with our suppliers/ clients.

LABOUR STANDARDS AND THE WORK ENVIRONMENT

As an EVA Global supplier, you are encouraged to meet requirements in labour standards and the work environment in ways that will contribute to your business success and to society's advancement.

Equal Opportunities, Diversity, and Inclusion

- ◆ As a supplier, we comply with all national laws in the country of hire in relation to employment. We ensure a fair wage for all our employees making sure that salary bands support our values in terms of equal opportunity, diversity and inclusion, together with minimum wage criteria which we meet and go beyond in all countries that we do business in. Additionally, the company confirms that it does not employ staff under the age of 18 and all companies in its supply chain are encouraged to have zero tolerance of the exploitation of children through child labour [ILO Conventions 138 and 182]
- ◆ We select and appoint employees based on their personal qualifications and skills for the job and support suppliers to do the same
- ◆ Internal processes for advancement inside the company are subject to transparent processes that ensure equality of opportunity
- ◆ Employees have the right to join trade unions. They have the right to associate and bargain in order to reach agreements about their terms of employment
- ◆ With respect to the above, our suppliers are expected to respect all labour standards as described in the ILO Declaration of Fundamental Principles and Rights to Work

- ◆ EVA Global is committed to maintaining and enforcing effective systems and controls to prevent slavery and human trafficking in our corporate activities. Any reported breach regarding the same will be investigated and may lead to legal proceedings. EVA global commits to taking all necessary steps to ensure the workforce is free from effects associated with modern slavery, human trafficking or forced labour
- ◆ We do not tolerate discrimination on the basis of gender, age, race, religion, or beliefs, ethnic or national origins, marital/civil partnership status, sexuality, or disability.
- ◆ We appreciate diversity in our employees' background, talent, insight, education, and experience, and believe this contributes to our success and sustainability by enhancing innovation, flexibility, and the ability to communicate with our stakeholders.
- ◆ We make decisions relating to engagement and promotion that are based on merit. A decision relating to engagement or promotion is based on merit if:
 - ◇ All eligible members of the supplier community are given a reasonable opportunity to take part in the selection process
 - ◇ An assessment is made of the relative suitability of the candidates to perform the relevant duties, using a competitive selection process
 - ◇ The assessment is based on the relationship between the candidates' work-related qualities and the work-related qualities required to perform the relevant duties
 - ◇ The assessment focuses on the relative capacity of the candidates to achieve outcomes related to the relevant duties
 - ◇ The assessment is the main consideration that leads to the decision made.

Respectful Work Environment

- ◆ We value teamwork as an important part of our organization's success. In working together, we treat each other with respect, courtesy, and fairness
- ◆ We value and protect our right to work in an environment free from harassment

- ◆ We do not tolerate any conduct by any employee, customer, partner, or any person associated with our business activities that harasses, threatens, disrupts, or interferes with another person's work performance or creates an intimidating, offensive, abusive, or hostile work environment.

Protecting health, safety and well-being

- ◆ We all share the responsibility for a safe, healthy, and professionally managed workplace, wherever we operate
- ◆ We believe all workplace incidents can be prevented by investing in a strong safety culture, effective risk management and continuous improvement as we strive towards our goal of zero harm
- ◆ We show safety comes first by working safely, participating in health and safety activities, and taking care of each other
- ◆ We expect everyone we work with to respect and follow our health and safety commitments and requirements
- ◆ We can all share in looking after each other through our well-being club which aims to be a channel for addressing mental health/ health issues in the workplace; peer support is harnessed by those in need of advice or help of some kind.

Protecting Our Workplace – Alcohol Use and Abusive Substances

- ◆ EVA Global strives to ensure an alcohol-free workplace and one in which the consumption of abusive substances is not tolerated. The workplace is therefore a place of respect for all workers. No access will be allowed to our employees who are under the influence or seemingly under the influence of drugs or alcohol. National authorities have a duty of care regarding safety and hygiene in the workplace, and protect the right to the development of the individual.

- ◆ EVA Global will take measures in terms of prevention of consumption of drugs or alcohol, and assistance and support for the worker. In this respect, disciplinary measures will be taken following steps to change attitudes and behaviours, with clear information to be made available to our employees on the consequences of abuse.

Reporting Misconduct

- ◆ We encourage our suppliers, employees, and stakeholders to speak up and voice concerns they may have regarding possible breaches of the code of business conduct. Employees are encouraged to contact their supervisors, managers, or other appropriate personnel when in doubt about the best course of action in a particular situation or file their concern directly through the whistleblower platform [via intranet]. Our suppliers are requested to raise possible breaches of the code of conduct via the company POC. Other stakeholders, e.g. clients or board members are requested to voice concerns in the first instance through the client's POC or through the mechanism of the board meeting in the case of a board member. Should they so wish, a link to the whistleblower system is provided on the EVA Global website.
- ◆ EVA Global offers the security of a whistleblower policy for reporting suspected violations of our Code of Conduct. It provides our employees with the possibility to report anonymously and in their native language. Reporting channels are maintained by the HR department and designed to guarantee anonymity
- ◆ We apply zero tolerance to retaliation of any kind against the persons who voice their concerns or assist in investigations of violations
- ◆ We will ensure confidentiality for anyone reporting suspected violations. There will be no retribution or punishment for any person who reports a suspected violation in good faith

- ◆ Individuals who are found to have violated our policies and/or this Code of Conduct, as well as those who may have failed to detect or report the situation, will receive appropriate disciplinary action.

Our work environment is a reflection of how we interact and how we treat each other. We need to understand, value, and incorporate individual differences that so many backgrounds bring to the table.

OUR ENVIRONMENT – SYSTEMS AND RESOURCES

Trust in our team members and partners extends to expectations in how we access our equipment, systems and other assets – with care, professionalism and an understanding that most resources are finite and imply a cost. Looking after our equipment and resources will directly impact the success of the company. This can mean simply looking after our laptops but also extends to how we use our time which is another crucial resource.

This also extends to how we approach information security, protecting the company from loss or harm. We should apply care when transferring confidential information and keep proprietary information safe and secure, respecting intellectual property rights of others.

OUR WIDER ENVIRONMENT

EVA Global supports and bases this code of business conduct on the UN Sustainable Development Development Goals and outlines the following SDGs as areas of impact most relevant to EVA Global’s activities.

5 GENDER EQUALITY

EVA GLOBAL is committed to protecting gender equality within all company activities. Currently, over 50% of all employees, including managerial roles, are held by female employees. EVA Global recognizes that gender equality is and has always been an important goal set by the company

9 INDUSTRY, INNOVATION, AND INFRASTRUCTURE

EVA has grown its services and products to ensure a seamless transition to sustainable transport by offering end-to-end managed services exclusive to e-mobility. These data-driven solutions have been developed to provide innovative operational solutions to our industry partners developing the infrastructure of the future and providing the foundation for the accelerated path to clean transport. We are committed to continuing the development of our knowledge bases, and of course serving our industry partners and EV (Electric Vehicle) drivers everywhere throughout the e-mobility revolution and beyond.

11. SUSTAINABLE CITIES AND COMMUNITIES

Our mission is to accelerate the transition to zero-emission transport, EVA's daily activities offer support to the people behind the transition to sustainable cities and communities. Our services collect the feedback provided directly from EV drivers on how to continue to improve and future-proof the EV charging network. Our industry partners rely on this monthly customer feedback to implement the necessary modifications to their charging network mapping and prospective planning. Building sustainable cities and communities is the reason for which EVA Global was founded, and we are committed to sharing this insight and knowledge within government and industry events.

13. CLIMATE ACTION

As a leading e-mobility Solutions Provider, we have direct contact with EV drivers across Europe, as well as in Asia and shortly in the Americas. In the first three years, it is estimated that EVA's services have saved 1 Kiloton of CO₂ emissions from entering the atmosphere by assisting 7 million electric miles driven by our end-customers: EV Drivers.

17. PARTNERSHIPS FOR THE GOALS

EVA Global is proud to have formed over 40 trusted partnerships within the e-mobility ecosystem since its foundation in 2017. Understanding that within any industry, but particularly a new and developing one, the power of partnerships is what marks the difference for quick and efficient

impact, EVA remains open to all collaborations for empowering the industry's mission. We are grateful to all our partners with whom, together, we have achieved progress in great leaps and strides in only a few short years.

Alongside our industry partners, EVA is proud to be members of AVERE (the European Association for eMobility), REA (Renewable Energy Association UK) and AEDIVE, (Spain's national eMobility Association). Through these partnerships we can further engage with the public by promoting the benefits of switching to electric vehicles, as well as public bodies at all levels (local, national, and European) to ensure progressive policies are implemented for reaching the communal goal of NET-ZERO.

BREACHES TO THE CODE

- I. Procedural fairness will apply to all parties involved in any investigation, that is:
 - a. (i) there is a right to fair and impartial consideration by an unbiased person
 - (ii) the parties have the right to know of, and comment on, any information which is damaging to their case or interests; and
 - (iii) there must be facts or information to support findings.
 - b. A determination shall be made without delay and comply with regulation.
 - c. The person who determines whether the employee has breached the Code of Conduct must be independent and unbiased. The whistleblower decides on exclusion of supervisors if required.
 - d. No investigative procedure will take longer than regulatory time frames require.
- II. Whistleblowing
 - a. The whistleblower mechanism is to allow early detection of breaches of the code of conduct.

- b. The whistleblower mechanism establishes channels to efficiently report breaches of conduct or non-compliance with legislative norms, while respecting confidentiality and protecting the whistleblower from reprisals.
- c. EVA Global will follow all national and European legislation that prevents whistleblowers being held responsible for having used the whistleblower mechanism. EVA Global therefore guarantees the safety and confidentiality of the informant to prevent reprisals and prevent any economic sanction.
- d. EVA Global establishes a single platform link for employees to use on the company intranet in case of alert of breach of code of business conduct. Additionally, employees and clients or other stakeholders, ...member of the public, may use the whistleblower link on the company website or also use any official channel set up by the competent authorities to inform on infractions.
- e. The person who determines whether the employee has breached the Code of Conduct must be independent and unbiased. The whistleblower decides on exclusion of supervisors if required.
- f. No investigative procedure will take longer than regulatory time frames require.

The Supplier is expected to observe and comply with all relevant laws and regulations of the legal system in the country where they operate and to where they purchase and/or sell their products from and/or to and/ or offer their services. All Suppliers are expected to refrain from doing anything of which they know or should know that would conflict with the law, regulations or company policies. In the unlikely event that one or more provisions in this Code of Business Conduct would conflict with the locally applicable laws, then the law always prevails. Violations of this Code of Business Conduct or any laws may expose EVA Global to risk of financial loss or unfavourable publicity. The company will take steps to proceed against such violations of the code of business conduct.

EVA Global expects our business partners and suppliers to have a comparable Code of Business Conduct. If this is not available, EVA Global will request that the supplier endorses this code of business conduct.

EVA Global is a brand name of EVA Solutions Group OY