

**ENERGY EXCHANGE SOLUTIONS
GmbH**

Code of Ethics

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Mission and Values

Our mission is to ensure energy market efficiency and supply security through professional management. We combine deep market analytics with responsibility for the energy security of Germany.

Scope of Application

This Code applies to all employees, managers, and board members of the company. We also expect our suppliers and business partners to adhere to similar ethical principles within the scope of our cooperation.

Our Values

▶ **Market Integrity & Honesty**

We strictly adhere to REMIT regulations and exchange trading rules. We oppose any form of market manipulation or the use of insider information.

▶ **Risk Management & Discipline**

Success in trading is built on discipline. We operate within defined risk limits, ensuring the company's financial stability under any market conditions.

▶ **Expertise & Data-Driven Excellence**

We rely on accurate data and advanced technologies. Our decisions are based on objective analysis, allowing us to be a reliable and liquid market partner.



Transparency & Trust

We build long-term relationships with counterparties based on transparency, timely fulfillment of obligations, and mutual respect.

Compliance with LkSG

We comply with the requirements of the LkSG, ensuring due diligence across all supply and trading processes.

This includes:

- ▶ **monitoring environmental standards in production, transmission, and supply of electricity;**
- ▶ **implementing risk assessment and monitoring systems among suppliers and counterparties;**
- ▶ **taking corrective measures in case of violations;**
- ▶ **transparent communication with regulators and partners regarding LkSG compliance.**

Diversity and Non-Discrimination

▶ We respect the personal dignity, privacy, and personal rights of every individual. We do not tolerate any form of discrimination, harassment, or bullying based on ethnic origin, gender, religion, ideology, disability, age, or sexual identity (in accordance with the German General Act on Equal Treatment - AGG).



Business Ethics

Anti-Corruption: We do not accept or offer any bribes or improper advantages.

Conflict of Interest: Employees must avoid situations where personal interests could influence professional decisions.

Fair Competition: We compete in the market solely through fair methods, complying with German and EU antitrust laws.

Human Rights and the Environment: We are committed to complying with internationally recognized human rights and environmental standards. We reject all forms of forced and child labor and ensure that our business activities do not have a negative impact on the environment. We expect our business partners to share these commitments throughout the global supply chain.

Sanctions and Export Control: We strictly comply with all applicable economic sanctions and export control laws. We do not engage in business relationships with individuals, entities, or organizations listed on the sanction lists of the European Union (EU), the United Nations (UN), or the Office of Foreign Assets Control (OFAC).

We conduct regular screenings of our counterparties and business partners to ensure compliance. We do not facilitate any transactions that could circumvent international trade restrictions. Any suspicion of a sanctions breach must be reported immediately to the Compliance Department.

Occupational Health and Safety

The health and safety of our employees is our top priority. We provide a safe and healthy working environment in accordance with German occupational health and safety laws.

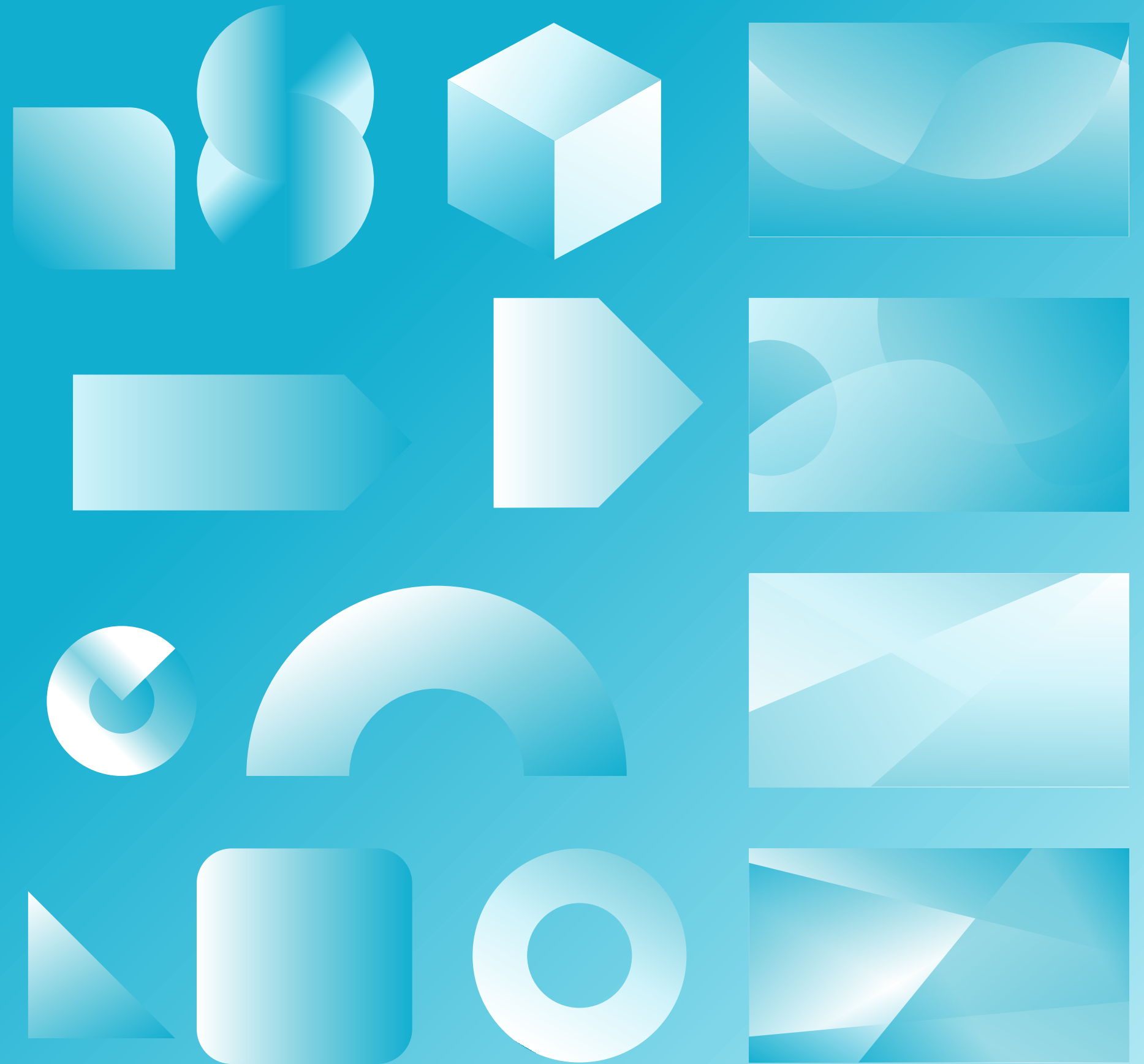
We strictly adhere to all safety regulations and internal instructions. Every employee is responsible for following safety protocols and reporting potential hazards immediately.

We promote a culture of prevention to ensure that everyone returns home healthy every day.

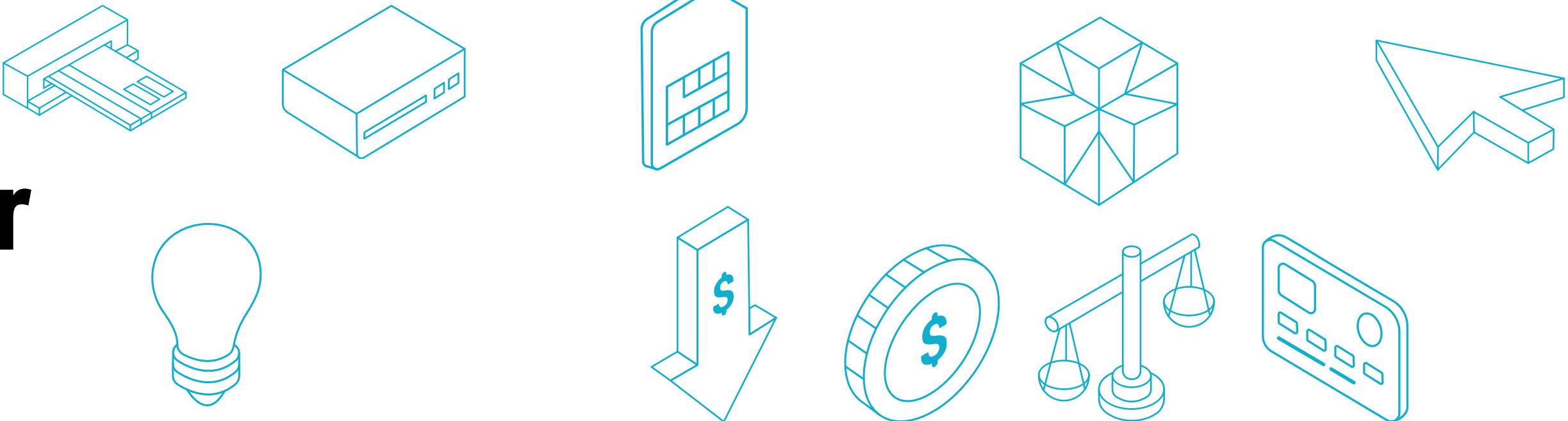
Confidentiality and Handling of Information

We guarantee confidentiality and the proper handling of information. We strive to protect all confidential information in our possession and not to misuse it, regardless of whether it belongs to the Company or our business partners. The duty of confidentiality continues after the termination of employment or other contractual relationships.

In addition to confidentiality, we are committed to the protection of personal data. We collect, process, and use the personal data of employees and partners only in accordance with the General Data Protection Regulation (GDPR) and other applicable data protection laws.



Reporting Grievances or Violations



We encourage a culture of openness. If you witness a violation of the law or this Code, you can use the following channels:

- Direct Supervisor or the Compliance Department.
- Anonymous Reporting email: **compliance@ees.group.**



Final Statement

Compliance with these rules is the foundation of our reputation and long-term success.

Non-Retaliation Policy: We guarantee that no employee will face any professional disadvantages or retaliation for reporting a potential violation in good faith, even if the report proves to be unfounded.

