

Code of Conduct

ecobat

Our Code of Conduct

Our Code of Conduct isn't about fringe benefits or how to set up your workstation. It's not a contract or a list of do's and don'ts. The Code is about the choices you're going to make and how to think about them. The Code teaches us to think in a manner that not only complies with mandatory laws and regulations, but holds us to higher standards of integrity and honor.

For nuts-and-bolts information, we encourage you to connect with your supervisor or Human Resources. Together, you might consult other employees or visit PolicyTech, where individual policies and procedures can be found.

[CLICK HERE FOR THE CODE OF CONDUCT IN:](#)

French

German

Italian

Spanish

NOTE: Printed copies of this document are uncontrolled. In the case of a conflict between printed and electronic versions of this document, the controlled version published online prevails.

CEO Statement

Ecobat is a global leader in battery recycling. Through a circular energy economy, we meet essential energy storage needs by making the business of batteries safer and more sustainable. With the addition of lithium-focused facilities, we've enhanced our commitment to sustainability to include lithium battery collection, discharge and diagnostics, dismantling, crushing/sorting and recycling management, and taking a responsible and technologically advanced approach just as we do with lead.

Our Values

PROUD

We find a deep sense of pleasure and satisfaction in our work achievements and the qualities we share.

RIGOROUS

We gather all the facts before we engage. Before taking action, make sure you've done your homework.

CARING

We prioritize the wellbeing of our people, our communities, and the planet. We are intentional about making a positive impact.

ENGAGED

We are consistent, precise, and purposeful.

OPERATIONAL EXCELLENCE

We embrace the principles and tools that produce efficient, superior outcomes.

COLLABORATIVE

We produce effective and efficient outcomes because we work together as a team.

Our story spans centuries but we're thrilled to see where the future leads us – Ecobat's work is essential to meeting the world's environmental and climate change challenges. Ecobat's future is limitless, and we're thrilled for you to be a part of our journey.

Tom Slabe

Accurate Books & Records

Accurate and reliable records are necessary to manage our affairs and meet our obligations. The books and records should reflect all business transactions in an accurate and timely manner. As with any business, any use of Ecobat funds or assets must be supported by documentation and that documentation must be accurate. Employees responsible for accounting and record-keeping functions are expected to practice due diligence in enforcing proper practices. For more information on the recording of company transactions and accounting practices, consult the Ecobat Accounting and Finance Department. For information on recordkeeping in non-financial settings, consult with the relevant corporate function leader.

Anti-Bribery

Bribes in every form are illegal. Ecobat and its employees must comply with the anti-bribery and corruption laws in all jurisdictions where we conduct business. This includes, but is not limited to, the United States's Foreign Corrupt Practices Act and similar laws in the United Kingdom, Germany, France, Italy, Austria, the Netherlands, Belgium, and Spain. Nearly all of the countries in which we have operations and conduct business are a party to the Organization for Economic Co-operation and Development ("OECD") Anti-Bribery Convention.

Brokers, agents, consultants, or other Ecobat business partners shall be at reasonable market rates for their rendered services and/or expenses. Such payments should be made in accordance with a written agreement underlying the terms of service and payments.

Note that although bribes are normally thought of as payments, such as cash or bank transfers, inappropriate gifts, favors, or hospitality could also be considered bribes.

Antitrust and Competition Compliance Laws

At Ecobat, we comply with antitrust and competition laws because we believe in preserving and promoting fair and open competition. It is illegal to:

- Conclude any agreements, formal or otherwise (verbal or written), with competitors: (1) to directly or indirectly agree on prices or factors relevant to pricing, or (2) to allocate products, markets, territories or customers, (3) to boycott customers or suppliers
- Obtain from or share with competitors' information about current or future prices, profit margins or costs, bids, market share, distribution practices, terms of sales, specific customers, or vendors
- Engage in exclusionary conduct (such as tying, bundling practices, loyalty rebates, or refusal to supply) when we hold the dominant position

Even when talking to industry colleagues at trade shows, Ecobat employees should not exchange current or future price information, or other confidential business information. "Other" confidential business information could include, but is not limited to, sales revenue, sales volumes (including market shares), sales territories, marketing and distribution strategies, market entry, customer lists, terms of sales agreements, suppliers, purchase volumes, purchase prices, provisions from purchase agreements, R&D strategy and plans, production capacity, capacity utilization, and output.

While Ecobat's Legal Department provides regular training on these topics, employees should always contact their manager or the Legal Department when they have questions regarding antitrust or competition laws.

Assets and Confidential Information

Each day, our employees deal with a wide variety of tangible and intangible assets that are essential to Ecobat's operations. Protect our confidential information and use it appropriately. Similarly, do not be tempted into using another party's assets, intellectual property, or confidential information.

As we manage and protect our company's assets, intellectual property, company secrets, and employee personal information, we respect the property of others.

Conflict of Interest

Do not use your position or knowledge gained through employment for private or personal advantage. If a situation arises where you feel like you might be in jeopardy of being or appearing to be in this type of situation, you must alert your supervisor, Human Resources, or the Ecobat Legal Department immediately. This includes situations involving outside activities and employment, relationships with clients/customers/suppliers, familial relationships (or close personal relationships that could give rise to nepotism concerns), and exchanging gifts, hospitality, and favors. Gifts, hospitality, or favors valued at over \$500 USD must be pre-approved in writing by an Executive Leadership Team member.

Each year, you will be required to complete a disclosure form regarding actual or potential conflicts of interest.

Conflict Minerals Statement

In our business, we use substances defined as “conflict minerals” by one or more governmental institutions. We do not, however, directly purchase any conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries. To this end, Ecobat requires our direct suppliers to be DRC conflict-free and have internal due diligence measures for conflict-free sourcing. We also actively manage and clearly communicate our expectations down the supply chain to our direct suppliers in the Ecobat Third-Party Code of Conduct and the Ecobat Modern Slavery Statement.

Imports/Exports

All products and materials intended for import or export will:

- Be correctly classified based on country of origin, destination, end use, and end user;
- Include all proper documentation, labeling, licensing, permits, and approvals; and
- Identify restricted software.

We’re committed to using only approved customs brokers, freight forwarders or other third-party logistics agents, obtaining the proper documentation and licenses before moving material and products across an international border, and ensuring all customs declarations are correct.

People

We treat people with dignity and respect. The working environment shall be free from harassment, physical or verbal abuse, and intimidation. We do not permit discrimination in hiring, compensation, access to training, promotions, or terminations based upon race, national origin, religion, disability, veteran status, age, gender, marital status, sexual orientation, or political affiliation.

Political Support

Ecobat recognizes and respects employees' rights to participate in political activities of their choosing and respects their right to privacy with this matter. If such circumstances create a disruption in the workplace or industrial unrest, we reserve the right to address appropriately.

Ecobat funds, goods or services, however, must not be used as contributions to political parties or their candidates. Ecobat facilities are not available to political candidates or campaigns. It should never appear (whether overtly or covertly) that Ecobat endorses a political party or candidate of any kind.

Sanctions

Ecobat complies with laws imposing embargoes and sanctions against specific countries, entities, and/or individuals. To ensure timely compliance, Ecobat has implemented software that reviews the entities' relationships with employees, independent contractors, vendors, customers, and suppliers. Employees must input appropriate levels of information for screening prior to commencing the business relationship.

Employees who have questions about proper transactional diligence should contact their supervisor or the Legal Department before finalizing, executing, or performing on sales and purchase agreements.

Sustainability

Ecobat is committed to protecting the health, safety, security, and rights of all those working at the company and for our company operations. In addition to being vital to our license to operate, ensuring sound environmental performance is the right thing to do. Our integrity centers around our ability to transparently communicate our environmental, health, and safety performance to our stakeholders. We take an active role in assuring the impacts of our activities are controlled, prevented, and measured in order to continuously improve through established metrics, goals, and programs.

We're Here to Help

If you have questions about what applicable laws or rules might be, your resources include your supervisor, Human Resources, the Legal Department, or our SpeakUp Hotline. Our SpeakUp Hotline is a website, but it's also available via phone. This source is available 24 hours a day, seven days a week.

REPORT ONLINE

- <https://ecobat.integrityline.com/>

CALL

- United States: (800) 369-5144
- Austria: 800 281119
- France: (0)805 080339
- Germany: (0)800 181 2396
- Ireland: 1800 904 177
- Italy: 800 727 406
- United Kingdom: (0) 808 189 1053

If you're worried that a colleague or vendor is violating the law or our Code of Conduct, you must promptly report the concern. You can use any of the methods listed above. If you decide to make an anonymous report through the SpeakUp Hotline, we'll treat your report as confidentially as possible while maintaining the integrity of our investigation. Anonymous reports will be given a unique report number and self-elected password which will allow you to anonymously check on the status of your report and communicate with us.

Ecobat takes legal and policy violations seriously. Employees who are aware of violations but turn a blind eye may be disciplined. Depending upon the seriousness of the violation that they ignored, disciplinary action may be severe – it may even include termination.

Ecobat also prohibits retaliation against any employee who reports or participates in an investigation of a possible violation of our Code of Conduct, policies, or the law. If you believe you are being retaliated against, please contact your Human Resources team, the Legal Department, or the SpeakUp Hotline.

