

## Code of Conduct

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**Version:** 1.0

**Effective date:** 10.03.2025

**Approved by:** Managing Director

**Owner:** Compliance

**Applies to:** All employees, directors, contractors and anyone acting on HYDROGENERA's behalf.

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## Message from the CEO

At HYDROGENERA, how we achieve results matters as much as the results themselves. This Code of Conduct sets the expectations we all share for integrity, respect and responsibility in every decision we make. It applies to each of us and to anyone acting on our behalf. I ask you to read it, use it and speak up if something does not feel right. Thank you for helping us build a culture where people thrive, customers trust us, and our impact on society and the environment is positive and responsible.

**Dragomir Ivanov**  
**CEO**

# HYDROGENERA

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## 1) Purpose & scope

This Code sets the standards of behaviour we expect in our daily work and in our dealings with customers, suppliers, partners and public authorities. It applies in every country where we operate and to all business activities.

## 2) Our values

- Integrity: We act honestly and keep our promises.
- Respect: We treat people with dignity and foster an inclusive culture.
- Responsibility: We protect people and the planet and use resources wisely.
- Accountability: We own our decisions and speak up about concerns.

## 3) Compliance with laws & regulations

We comply with all applicable laws, industry standards and contractual obligations. Where this Code sets a higher bar than local law, we follow the Code.

## 4) Anti-bribery & corruption

- Zero tolerance for bribery, kickbacks, facilitation payments or improper advantages.
- Gifts, hospitality and sponsorships must be modest, transparent, lawful and never intended to influence. Pre-approval required above [€] [value] or when government officials are involved.
- Record all expenses accurately; never falsify books or records.

## 5) Conflicts of interest

Disclose any situation that could conflict with HYDROGENERA's interests (outside jobs, investments, family relationships with suppliers/customers). Do not take corporate opportunities for personal gain.

## 6) Fair competition & trade compliance

- Compete fairly; never agree prices, terms, markets or bids with competitors.
- Handle competitor information responsibly.
- Follow export controls, sanctions and customs rules; never do business with restricted parties.

## 7) Data protection & information security

- Process personal data lawfully, for legitimate purposes and only as needed.
- Protect confidential information and intellectual property; use strong passwords, report incidents immediately.
- Use company systems appropriately; avoid unauthorised software and risky downloads.

## 8) Accurate records & reporting

Maintain complete, timely and accurate records; follow internal controls and finance policies; report irregularities.

## 9) Environmental stewardship

- Comply with environmental laws and permits.
- Reduce energy use, emissions, water and waste; prevent spills and pollution.
- Design and operate with resource efficiency and circularity in mind.

## 10) Social responsibility & human rights

We respect internationally recognised human rights and expect the same of our partners. See our Human Rights & Working-Conditions Policy for detailed commitments.

## 11) Health, safety & well-being

Provide a safe and healthy workplace; follow safety procedures, use PPE, stop unsafe work, report hazards and incidents promptly. No drugs or alcohol at work; no violence or threatening behaviour.

## 12) Speaking up (whistleblowing)

Raise concerns in good faith via:

- Your manager
- Compliance ([compliance@hydrogenera.eu](mailto:compliance@hydrogenera.eu))
- Retaliation against reporters or participants in investigations is prohibited.

## 13) Working with third parties

Choose suppliers and partners based on quality, price, sustainability and integrity. Require them to meet standards consistent with this Code; perform risk-based due diligence.

## 14) Training & awareness

Mandatory onboarding and periodic refresher training on this Code and related policies.

## 15) Breaches & consequences

Violations may lead to disciplinary action up to and including termination, and to civil/criminal penalties where applicable.

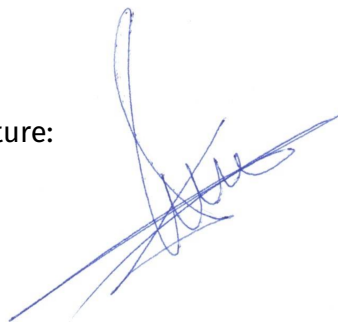
## 16) Governance, review & updates

The [Owner] monitors compliance and updates this Code at least annually or when laws/risks change. Questions: [Owner contact].

**Approved by:** Dragomir Ivanov, CEO

**Date:** 10.03.2025

Signature:

A handwritten signature in blue ink, appearing to be 'D. Ivanov', written over a horizontal line.