

Code of Conduct

of Impact Clean Power Technology S.A.

Introduction

1. Values build the company.

The Code of Conduct of Impact Clean Power Technology S.A. is a guide created to help everyone understand our values and outline expectations for everyday practices. The Code provides guidance on our behaviour when interacting with each other, with customers and with the communities in which we operate. The Code is the basic document we refer to in case of ethical dilemmas. It also provides information on whom to contact with questions or concerns. Our Code is based on our values, a set of beliefs that guide our actions. These values commit us to operating according to the highest ethical standards, in a responsible and sustainable manner. They should be reflected in everything we do.

2. Basis of the Code

We care about people and the environment. We either work safely or not at all. We are never indifferent to unsafe behaviour. We promote concern for health and well-being. We promote green, environmentally friendly solutions and conduct our business in an environmentally responsible way. We are responsible to future generations.

3. Employees' ethics

We conduct our business in a fair and transparent manner. We operate in accordance with the Code of Conduct and do not accept shortcuts. We support the creation of an open work environment where everyone can express their opinion.

4. Together we can do more

Individually as employees, as teams and as the entire company, we are always striving to be better in everything we do. We are a learning organisation and we openly share our knowledge. We pride ourselves on quality and innovation. We create Impact together with the customers, partners and communities. We use diversity to deliver the best solutions. We foster a culture of inclusion, being open and honest, showing trust and respect for one another.

5. We care about the customer

We help our customers to succeed in their business. We seek to understand their needs and those of their clients. We help our customers transform their vision into reality. All employees of Impact Clean Power Technology S.A. must adhere to the principles and comply with the requirements outlined in this Code. This also applies to the part-time or civil law employees and temporary workers. If you are a manager or supervise the work of others, you have a special responsibility. You must lead by example and act in accordance with this Code. Our Code has the highest priority. If you break a rule contained in the Code or in an applicable company policy document, corrective or disciplinary action will be taken against you, which may result in termination of your contract, among other things.

6. Reporting misconduct

Impact Clean Power Technology S.A. commitment to conducting business with a high degree of integrity and transparency depends on a culture in which everyone feels empowered to report non-compliance with our Code, including suspected illegal or unethical behaviour (collectively referred to as misconduct). You are responsible for reporting suspected or known incidents of misconduct to your supervisor or your supervisor's manager. If you prefer, contact your HR or legal department. If you are a manager, you are responsible for ensuring that reports of suspected or known misconduct are dealt with appropriately. For some reports, a referral to the Board may be the most appropriate course of action.

7. Prohibition of retaliation

Impact Clean Power Technology S.A. does not tolerate retaliation against an employee who has reported suspected misconduct in good faith. "Good faith" means that, to the best of your knowledge and belief, everything you report is true and you are not concealing anything. Disciplinary action will be taken against any employee who engages in retaliation. If you experience retaliation, report it as suspected inappropriate conduct.

Section 1

1.1. Safety, health and well-being

Health and safety is focused on preventing accidents and promoting a healthy and safe working environment for all employees, colleagues and members of society who come into contact with our projects. This is a key priority for Impact Clean Power Technology S.A. and our goal is clear: a hazard-free environment. Well-being is a feeling of satisfaction that often depends on the working environment. It includes elements such as supportive supervision, a sense of purpose and physical security.

Impact Clean Power Technology S.A. principles

- We care about our people and the people affected by our work.
- We continually strive to create a working environment that promotes health, safety and well-being.
- We believe that visible leadership is required to deliver a strong programme focused on health, safety and well-being.
- We promote and share best practices on safety and accident prevention with those in the supply chain and the industry as a whole.
- We ensure our employees appropriate health and safety training.
- We make sure the subcontractor employees are properly trained and equipped with the equipment and tools to work safely.
- We want to lead the industry in terms of healthy and safe working conditions.

We are constantly making improvements to create a hazard-free environment.

What does this mean for the Employee?

- You have the right to a safe workplace.
- You have a personal responsibility to help ensure healthy and safe working conditions.
- You look after the health of your colleagues and report all accidents in the workplace and all dangerous and health-threatening circumstances to your manager or local health and safety officer.
- You never ignore work that is dangerous or a health hazard. You have the right and responsibility to stop them if you believe they are being carried out in an unsafe manner.
- Regardless of your role in the team, you can help create a safe workplace by demonstrating active, courageous and visible leadership on health and safety issues.

1.2. Appropriate working conditions

A tolerant and fair working environment is fundamental to Impact Clean Power Technology S.A. reputation as an industry leader.

- We recognise human rights as defined by the international community.
- We are careful not to adversely affect the respect for human rights with our activities and to address any issues in this area if they arise.
- We do not tolerate any form of child, forced or compulsory labour at our project sites or within our supply chain, including practices such as unlawful or unauthorised deductions from wages. We consider a child to be any person under the age of 15 or below a higher age specified by local legislation.
- We do not allow practices that would restrict the freedom of movement of workers, such as taking away identity documents or work permits as a condition of employment.
- We only allow working hours, wages and allowances that comply with the national and local laws.
- We recognise and respect collective agreements and the right of our employees to associate and bargain collectively where permitted by law.
- We maintain an ongoing dialogue with our employees to ensure that their rights are respected.

Dear Employee:

You have the right to be treated with respect and dignity. At the same time, you are obliged to respect the dignity, privacy and rights of everyone you come into contact with and everyone affected by our business activities. You are obliged to report concerns if you become aware of any undignified working conditions at Impact Clean Power Technology S.A. or at any of Impact Clean Power Technology S.A.'s subcontractors or suppliers.

1.3 Diversity

Diversity is anything that we, as individuals, differ from each other, such as age, gender, sexual orientation, ethnicity, membership of a particular generation, religion, beliefs, language, education, marital status. Inclusion is about ensuring that the wealth of unique ideas, views, perspectives and opinions from different group members are valued and promoted.

- We respect all individuals, strive to work as one team and encourage forms of open, honest and respectful communication.
- We trust that in a diverse and accepting working environment, better solutions for clients are created.
- We treat everybody equally, ensuring that everyone has equal opportunities to progress – regardless of appearance, background, religion, beliefs, gender, sexual orientation, gender identity or expression, age, disability, marital or family status or any other characteristic protected by law.

- Our policy of equal employment opportunity covers all aspects of employment, including training, promotion and any other related conditions.
- We do not agree to any form of disrespect, harassment, discrimination, bullying or unwanted sexual propositions.

What does this mean?

You contribute to a positive working environment where everyone feels valued and respected for their unique contribution.

- You are open-minded, you support teamwork and encourage others to come forward with new ideas and opinions.
- You do not participate in and respond to any form of bullying, harassment or discrimination.
- You do not engage in inappropriate, illegal, sexually charged or otherwise offensive activities, whether in the workplace or when representing Impact Clean Power Technology S.A. You do not distribute material with such content.

1.4 Personal development

Personal development opportunities help Impact Clean Power Technology S.A. employees develop their talents and potential and apply newly acquired skills and abilities to continuously improve the performance of our teams.

Impact principles:

- We believe that our people are our greatest asset.
- We support employees in both personal and professional development.
- We offer training and other development opportunities for employees to expand their knowledge and range of skills.
- We encourage them to grow and learn by collaborating with others and sharing best practices. What does this mean? You take responsibility for your own learning and personal development and are actively engaged in the process.

You have the right to receive feedback from your manager.

1.5. Personal data protection

Data protection is about safeguarding your right to privacy when processing personal data concerning you. Different countries have different definitions of personal data and legal requirements for its protection. Such data may include, for example: date of birth, contact information, names of family members, health information, photographs or identity document number.

Impact principles:

- We ensure that all activities involving personal data, e.g. collecting, recording, comparing, storing and deleting it, are carried out in accordance with current legislation.
- We respect everyone's right to the protection of personal data.
- We safeguard personal information about our employees and other stakeholders.
- We ensure that access to personal data is only provided to those who need it in order to carry out their official tasks.
- We ensure that all persons who access personal information added maintain appropriate measures to protect it.
- We ensure that personal data is not retained for longer than the time required to fulfil the purpose for which it was collected. What does this mean? You respect and pay attention to the privacy of others. You only access personal data when you have the right to do so and only to the extent necessary to perform your business tasks.
- You protect and treat confidentially personal data to which you have access.
- You only give others access to personal data when they actually need it, with the appropriate authorisation and in accordance with legal requirements.

1.6 Documents and reporting

Impact Clean Power Technology S.A. keeps and presents complete and accurate records of business activities, which means that our records and financial statements must always represent the true state of our business.

Impact principles:

- We believe that proper record-keeping is an essential part of conducting business with integrity and transparency.
- We document the nature of all financial transactions fully and accurately in accordance with locally accepted accounting principles.
- We maintain accurate non-financial records, such as those relating to quality, safety, health, environment, human resources, working hours and training. You ensure that all reports and documents are complete, accurate, represent the truth and are not misleading.
- You never falsify tests or test results.

- You never destroy or alter any information or data that needs to be kept to meet legal or contractual requirements or that is required for future audits or investigations.

1.7 Company assets

Impact Clean Power Technology S.A. has both tangible and intangible assets. Examples of tangible assets are: materials, funds, products, computers, real estate, machinery and equipment. Examples of intangible assets are: our brand, patents, trademarks, know-how, trade secrets and copyrights.

Impact principles:

- We use our assets responsibly.
- We protect Impact Clean Power Technology S.A. assets from damage, theft, loss and misuse because they are critical to our business.
- We do not use our computer and electronic communication systems for inappropriate communications, including any illegal activity or behaviour that could be considered discriminatory, harassing or bullying.
- We protect the assets of our clients and other stakeholders entrusted to us from damage, theft, loss and misuse. What does this mean? You properly manage your company's assets when using them in connection with the work you do for Impact Clean Power Technology S.A. or its clients. You do not use company assets for personal gain, such as performing private assignments. You cannot misuse company assets, including through fraud, data security breaches, phishing or the use of sexually or ethnically offensive or obscene content.

1.8 Maintaining confidentiality

Protecting our ideas, processes and business information is important to our competitiveness and to maintaining the trust of our stakeholders. For this reason, certain information is protected company property and is considered confidential. Confidential information includes trade secrets, know-how and proprietary information. It also includes business plans, financial records, customer information, details of projects we are applying for or are implementing, pricing information, employee files, accusations and investigations of reported misconduct, financial and accounting data, as well as other issues and methods related to the conduct of business.

Impact principles:

- We respect the confidentiality of information relating to Impact Clean Power Technology S.A. and our stakeholders.
- We do not expect new employees to provide confidential information relating to their previous employers.
- We take all reasonable measures to prevent the disclosure of confidential information to individuals who do not need it or are not entitled to access it in connection with their work. What does this mean?

You do not access, use, store or share confidential information without proper authorisation. You protect confidential information from loss or theft. This means protecting portable computing devices such as laptops and tablets, among others. If you receive confidential information by mistake – whether it comes from an external business partner, a colleague, a customer, an employee of a competitor or anyone else – you contact the sender, disclose the situation to a manager and do not use the knowledge gained in this way.

Section 2

2.1 Building relationships (our commitments in the marketplace)

We believe that in business, the best relationships are built on respect and mutual benefit. Therefore, we always strive to understand and anticipate the needs of our customers, suppliers, associates and other stakeholders, act with integrity, in a responsibly and fairly manner. As Impact employees, we have to give our best to ensure that our work delivers high quality results, is on time and within the planned cost. We always strive to exceed expectations. How the market perceives us depends on how we conduct ourselves in our day-to-day relationships with stakeholders. When we act openly, honestly and follow the Impact principles, we become the company we want to be. We all need to support in achieving this goal. Stakeholders include employees, customers, shareholders, external business partners with whom we contract and the communities in which we work. External business partners are joint venture partners, subcontractors, suppliers, intermediaries, advisers and others with whom we enter into contractual relationships to provide goods and services.

Impact principles:

- We aim to build positive, constructive and long-term business relationships with organisations whose values align with ours.
- We believe that stakeholders doing business with Impact Clean Power Technology S.A. have the right to be treated at the same level and with the same ethical principles that we expect of them.
- We will not give up our values for any stakeholder.

For our customers, we strive to anticipate their needs and exceed their expectations by being innovative and proactive. We strive to help them succeed by understanding their interests. We also strive to solve their problems, from the simplest to the complex.

What does this mean?

You act with integrity and fairness in all matters relating to our stakeholders, which you approach with professionalism and respect. You ensure that our Code or the Supplier Code is included in our contractual arrangements with external business partners (for further information regarding joint venture partners, see the Introduction to this Code). Before entering into relationships with external business partners, you ensure that they understand our ethical standards. You actively listen to our customers and make sure you have a good understanding of their needs and expectations.

2.2. Conflict of interest

Conflict of interest arise when there is a conflict between our personal interests and our duties as employees or representatives of Impact Clean Power Technology S.A. The mere appearance of a conflict of interest can be just as damaging as the actual conflict. Conflict of interest can arise from hospitality and entertainment, gifts, charitable and political contributions, sponsorships and close relationships or other forms of involvement with an entity that competes with or collaborates with Impact Clean Power Technology S.A.

Impact principles:

- We are accountable to our stakeholders for making decisions without regard to personal gain.
- We disclose potential conflicts of interest as required by policy documents issued globally or at the Department level and in accordance with contractual obligations.

What does this mean?

You do not engage in activities that create an actual or perceived conflict between your personal interests and those of Impact Clean Power Technology S.A. You avoid situations in which a conflict of interest may arise or which may appear to give rise to a conflict of interest. When a potential conflict of interest arises, it is your responsibility to report it in the manner prescribed by your Department.

2.3 Gifts, benefits

Hospitality: companies show hospitality to customers and partners in the form of meals, travel or events to promote their business. Gift: an item given voluntarily without expecting anything in return. Improper showing of hospitality and gifts can create a conflict of interest or the appearance of bribery. Impact principles: We do not request, accept or offer forms of hospitality or gifts that may influence – or give the appearance of influencing – our or our partners' business decisions. The forms of hospitality and gifts accepted and given must be appropriate and:

- Must comply with local laws and customs.
- Must not create an obligation of the recipient towards the donor or the appearance of such an obligation.
- Must serve a genuine business purpose. • Must not be immoral in nature or violate the dignity of others.
- Must be permitted under the recipient's employer policy.
- Showing hospitality should be within moderate value (check your Department specific policy).
- Gifts should be of symbolic value; for example, pens, notepads and other small value corporate gadgets (check your Department specific policy). Remember that promotional items are gifts.
- Each Department must establish a policy on hospitality and gifts with monetary limits and submit it to Impact Clean Power Technology S.A. for approval. In addition, it must establish a process for approving and recording forms of hospitality and gifts given and received above the approved limits.

What does this mean?

You make the best possible judgement when deciding whether to offer or accept a form of hospitality or a gift. If you feel something is wrong, you are probably right. You never offer or accept any gifts in the form of money or cash equivalents. You avoid offering or accepting any form of hospitality or gifts that may affect the objectivity of the recipient or yourself when making business decisions.

Remember also that too frequent or routine gifts or expressions of hospitality may be inappropriate. You report all forms of hospitality and gifts given or received that exceed the approved limits in accordance with your Department hospitality and gifts policy. You are obliged to be familiar and comply with your customers' hospitality and gifts policy. You never ask customers, suppliers or other external business partners for any form of hospitality or gifts.

2.4 We care about quality

We pride ourselves on quality and innovation and understand that delivering high quality work serves both our customers and Impact Clean Power Technology S.A.

Impact principles:

- We aim to deliver high quality in every area of our business. In doing so, we focus on continuous improvement.
- We work with our stakeholders to deliver products and services that meet or exceed their expectations.
- If defects occur, we recognise our responsibility and seek to rectify them in accordance with our contractual obligations. What does this mean? You strive for excellence in every aspect of your work. You work with customers and external business partners to understand their quality expectations and requirements. You report to your manager any suspected defects that have not been rectified in time.

2.5 Frauds

Fraud occurs when someone intentionally attempts to mislead another person, acts dishonestly or abuses the power associated with their position to gain any material benefit, or involves anyone else in such actions. Fraud usually aims to fraudulently obtain money, property or services. It constitutes a criminal offence in most countries. One potential type of fraud is false claims, which involves knowingly or recklessly misrepresenting or inaccurately documenting the cost of providing materials or services, deliberately concealing defects or fabricating evidence.

Impact principles:

- You act honestly, fairly and truthfully at all times.
 - You ensure that your books and records contain accurate, complete and non-misleading entries and you carefully check and control the activities within the scope of your duties.
 - You ensure that the expense claims you submit contain only those items for which you are entitled to reimbursement and which were properly acquired in the performance of your duties at Impact.
 - You only present correct invoices to our clients and ensure that contractual claims are supported by appropriate and truthful documents
- 2.6 Insider information and market abuse. Insider information is information about a company which has not been made public and which is likely to affect the price of financial instruments, such as Impact Clean Power Technology S.A. shares. It is prohibited to use

Insider information to buy or sell financial instruments (Insider trading), regardless of whether you do it yourself or disclose the information to someone else. In other words, Insider trading involves attempting to profit by using insider information. Other examples of market abuse include unlawful disclosure of Insider information and market manipulation. Impact principles:

- We comply with all applicable laws and regulations regarding Impact Clean Power Technology S.A. shares and other financial instruments.
- All employees are prohibited from using Insider information about Impact Clean Power Technology S.A. or other companies to acquire or trade in financial instruments.
- We communicate information that may affect the price of our shares through the Group Communications Department or the Group Investor Relations Department.

What does this mean?

You never disclose any confidential material or non-public information to anyone who does not have a legitimate need and right to know. You do not participate in market manipulation by disseminating false or misleading information or by engaging in activities designed to manipulate the prices of publicly traded securities. You never use Insider information to trade in the shares of Impact Clean Power Technology S.A. or any other company with which Impact Clean Power Technology S.A. does business, nor do you inform others of such opportunities.

Section 3

3.1 Our obligations in society

We are not just a leader in the automotive industry. We are an integral part of society and our activities extend beyond the projects we carry out for our customers. Our beneficial contribution to society includes finding new ways to reduce the environmental impact of our operations, promoting fair competition and improving the communities in which we live and work. The environment includes the impact of our operations and processes, as well as the long-term environmental performance of the products and services we provide. We are committed to protecting the environment and believe we can make a significant contribution to global sustainability. We actively work to improve the environmental performance of our operations, projects, products and services throughout their life cycle. When bidding for projects, we consider environmental opportunities and risks. We believe that community investment builds our reputation as a good citizen and helps build long-term relationships with our stakeholders. We support communities using our time, expertise and resources (in-kind contributions) as well as monetary contributions. We never use charitable donations – a type of community investment – for undue gain or influence. We focus on educational opportunities that bring clear and long-term benefits to community members.

3.2 External communication

External communication is an important part of our marketing and branding efforts. It includes all communication with customers, potential customers, partners, suppliers, investors, shareholders and other stakeholders. This includes media activities, press releases, statements, social media, publications, advertising and public presentations. We communicate with integrity and our communications should be precise and credible in order to maintain a high level of trust. We are open when engaging in dialogue with those affected by our activities. We respond to enquiries and communicate with interested partners in a professional manner. Timely, accurate, relevant and credible information should be provided when communicating with external stakeholders. You are an important part of communicating who we are and how we influence our stakeholders, and you are aware that the way you communicate affects Impact Clean Power Technology S.A.

3.3 Anti-corruption and bribery

Corruption is the abuse of power, often for personal gain, and includes conflicts of interest, embezzlement, bribery, taking unfair commissions, extortion, fraud, favouritism towards family members or friends, among others. A related issue is facilitating payments. These are bribes, often small, to public officials to speed up bureaucratic processes or to gain access to services to which the person paying is entitled. Corruption undermines fair business practices, distorts competitiveness, damages brands and puts companies and individuals at risk. Bribery is an attempt to influence a person performing an official function by giving, offering or promising them an undue advantage. It can also be the acceptance of an undue advantage or its promise, or the demand for an advantage such as cash or something else of value, such as an unpaid internship.

Impact principles:

We are committed to conducting business with integrity and do not tolerate any form of bribery or corruption. We avoid situations that might give even the appearance of bribery, corruption or other forms of improper behaviour. We do not demand, accept, give or offer bribes either directly or through external parties acting on our behalf. In our contracts, we require external parties to comply with the same rules and procedures related to anti-corruption and bribery that apply to Impact Clean Power Technology S.A. We do not make facilitation payments and do not allow external business partners to make them on our behalf, even if the law permits such action.