



Procedure for Gifts and Hospitality in Recharge

(Appendix 1 to bribery/corruption/fraud policy)

Recharge is a Charge Point Operator (CPO) which builds, owns, and operates infrastructure for the charging of Electric Vehicles. Recharge's charging business is conducted under the brand 'Recharge'.

Recharge offers its network of charging stations to providers of electromobility services ("EMPs"), to allow EMPs to give their customers access to Recharge's network of charging stations through subscription, app and other solutions. Recharge also offers drop-in charging (e.g., through QR code) to customers without a subscription.

For more information about Recharge and our business, visit www.rechargeinfra.com.

Scope

This policy covers Recharge AS, its subsidiaries, including hired contractors, consultants, temporary agency workers and other third parties acting on Recharge's behalf.

Validity

This policy is valid from May 2023. The Compliance Officer will assess and report on the policy annually.

Purpose

The purpose of this procedure for gifts and hospitality is to ensure that all employees in Recharge are aware of the rules and regulations regarding gifts and hospitality in regard to bribery, corruption, and fraud. This policy is intended to ensure compliance with Recharge's legal and regulatory Anti-Bribery and Corruption obligations, as well as to prevent fraud.

This procedure is Appendix 1 to bribery, corruption, and fraud policy and must be read in conjunction with such policy.

Terminology

To reduce the risk of bribery, fraud and corruption, we will always conduct our business with high ethical standards in a fair, honest and transparent manner. When in doubt regarding the application of this procedure, always reach out to The Compliance Officer for guidance.

To understand the terms and terminology in this policy, we will provide some concrete examples:

Bribe:

A bribe is an inducement or reward offered, promised or provided (or received), directly or indirectly, in order to gain an improper commercial, contractual, regulatory or personal advantage. Country-specific laws for bribery and corruption will apply.

Fraud:

Fraud can be perpetrated by persons outside as well as inside Recharge which have considered to committed fraud through abuse of position if they occupy a position in which they are expected to safeguard the financial interests of another person, dishonestly abuses that position, and intends by

means of the abuse to make a gain for themselves or another, or to cause loss to another or to expose another to a risk of loss.

The term fraud is used to describe acts such as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. Country-specific laws for bribery and corruption will apply.

Procedural Statement - Gifts and Hospitality Rules in Recharge

Recharge is committed to conducting our business fairly, honestly, and openly. We have zero tolerance of bribery and corruption and will not do business with others who do not commit to doing business without bribery and corruption.

Recharge has the following guidelines for gifts and hospitality:

- Gifts shall only be provided if they are given in the name of Recharge (not individual), do not include any cash or cash equivalent (such as bitcoin, checks, etc.), and do not exert undue influence. Gifts must be presented openly and not conducted in secret.
- Gifts and hospitality can be given and received up to €50. Such gifts will not be recorded by the Compliance Officer.
- Gifts exceeding €50 shall be declared with the Compliance Officer, who will determine if the gift shall be returned. The Compliance Officer will ensure that declaration of such gifts is recorded.
- Typical and appropriate client lunches and dinners are allowed either as giving as well as receiving, as long as they are not deemed to exert undue influence or intended to influence any ongoing or upcoming tender or negotiations processes. Client lunches or dinners does not need to be recorded, cf. section above.
- Gift shall not be given to any public officials or publicly owned limited companies.
- Recharge will not endorse contributions to political parties, but will only accept charitable donations that are legal and ethical under local law and practices. Such donations shall not be offered without prior approval from Recharge and are not deemed to be exert undue influence and will not be recorded.
- Recharge will not accept employees giving facility payments (“kickbacks”), which usually is cash gifts that are provided to expedite a routine/action towards a government official, in return for a business favor or advantage. Such payments are is illegal in Recharge’s jurisdictions.

- If an employee is unsure whether an act constitutes bribery, fraud, or corruption, they should reach out to the Risk Officer or Compliance Officer for assistance. All employees are encouraged to raise concerns about any issue or malpractice at the earliest convenience through the “**whistleblowing procedure**”.

Responsibility

The Board of Directors has overall responsibility for maintaining Recharge’s corporate governance framework, including anti-corruption and misconduct work in Recharge.

The Risk Owner (Chief Executive Officer) will:

- Annually assess the risk of corruption and misconduct in their unit/process and ensure that all leaders in Recharge are actively working to prevent corruption and misconduct in designated areas.
- Ensure that a culture where employees are encouraged to act with integrity at all times is maintained, and sufficient funds are allocated to this work. The Risk Owner is responsible for taking actions against any employees found in breach of this policy, in collaboration with the Compliance Officer.
- Ensure that the finance/procurement department carries out relevant risk assessment exercises and ensures that sufficient systems are in place, including the use of the “four eyes” principle on all purchases in Recharge.

The Compliance Officer has responsibility for:

- Publicizing the existence of the corporate governance framework and all associated documents.
- Ensure that all corporate governance framework documents, policy documents are published on applicable forum and ensuring a register and review of all corporate governance framework documents. The Compliance officer will do an annual assessment of this policy and risk.
- Recording gifts exceeding €50.

Employees has the responsibility to:

- Comply with the Anti-Bribery & Corruption policies, procedures, and standards prescribed in this policy.
- Act in accordance with the guidelines in this policy, and if unsure or have received what they believe is a bribe, reach out to the Compliance Officer.
- Attend and/or complete all relevant training and report any suspected or confirmed bribery, corruption or fraud that they become aware of in their daily work.
- Raise concerns about any issue or malpractice at the earliest convenience through the “**whistleblowing procedure**”.