

Recharge's Whistleblowing Policy

About Recharge

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 Recharges 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 our business, please visit our website at <u>www.rechargeinfra.com</u>.

Scope

This policy applies to Recharge AS and all its subsidiaries.

Validity

This policy is effective as of May 2023. The Compliance Officer will assess and report on the policy annually.

Purpose

Recharge is committed to conducting its business with honesty and integrity and maintaining a documented whistleblowing procedure in accordance with applicable law requirements and generally accepted whistleblowing standards for each country.

This policy is designed to encourage employees to raise concerns without fear of reprisal and to ensure that any wrongdoing is addressed appropriately. This policy explains how Recharge handles cases of whistleblowing and how our employees, contractors, including sub-contractors can make a disclosure in accordance with the whistleblowing rules.

Whistleblowing

In short terms, "whistleblowing" is when an employee passes on information concerning wrongdoing at work. The wrongdoing could be anything from criminal offences to the protection of the environment, endangerment of health and safety of any individual, or deliberate concealment.

Whistleblowing protection is available to employees or contractors making a (protected) disclosure of certain information which, in the reasonable belief of that person, is made in the public interest. This "certain information" covers issues from criminal offences to the protection of the environment, endangerment of health & safety of any individual and deliberate concealment.

Whistleblowing in Recharge

Recharge has established a whistleblowing committee, which has instructions for employees and contractors to conduct whistleblowing and guidelines for the whistleblowing committee to conduct their work.



Employees can also use an external whistleblowing channel through the law firm Advokatfirmaet Haavind if they prefer.

Creating an open, transparent and safe working environment where employees are able to speak up without fear of reprisal, knowing that we will treat all disclosures consistently and fairly, is of the outmost importance. Recharge will take all reasonable steps to maintain the confidentiality of the person making the disclosure (providing it is lawful to do so) and investigate promptly and act when necessary and required by law.

Recharge will give feedback to the employees who makes a disclosure, wherever it is possible and appropriate to do so in accordance with legal requirements. We support our employees who make a protected disclosure with access, as appropriate, to mentoring, advice and counseling in confidence. Our company maintain records of the number of whistleblowing disclosures received and their nature as well as the date and content of any feedback provided. Recharge will provide appropriate information, instruction and training to ensure all employee are aware of whistleblowing law and what steps to take in event of such a circumstance.

Our Responsibility

In Recharge, we take corporate governance seriously. The **Chief Executive Officer** is responsible for maintaining Recharge's corporate governance framework, including this policy.

In addition, our **Compliance Officer** is responsible for:

- Publicizing the existence of the corporate governance framework and all associated documents.
- Ensuring all corporate governance framework documents, policy documents are published on applicable forums.
- Maintaining a register and review of all corporate governance framework documents.
- Coordinate with Whistleblowing committee to ensure that any changes are updated.

Employees are responsible for:

 Ensuring that they use the whistleblowing process to disclose any suspected danger or wrongdoing to Recharge's whistleblowing committee or external safety channel. Our employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries can be addressed to the Compliance Officer.