

A photograph of two hikers with large backpacks ascending a mountain trail. The hiker on the left is wearing a dark jacket and leggings, using a red trekking pole. The hiker on the right is wearing a green jacket and dark pants. The background shows a vast mountain range under a clear blue sky.

VOLTATRON®

Code of Conduct Voltatron AG

Applicable to all employees worldwide.

As of February 2026



Letter from the Management Board

Honorable, ethical behavior is the basis for trust within our company as well as with customers, business partners, and the public. In an increasingly complex and interconnected world, it is not enough to be economically successful. Sustainable success arises where integrity, transparency, and responsibility determine daily actions.

The Voltatron AG Code of Conduct creates a binding framework for this. It describes the values and principles that guide our actions and provides guidance to all employees in situations where decisions have to be made.

Voltatron AG is committed to transparency and responsibility in all areas of business. We have pledged ourselves to respectful and fair cooperation. For us, equal opportunities and diversity are essential components of a strong corporate culture. We firmly reject discrimination, especially on the basis of age, origin, gender, sexual orientation, skin color, religion, or disability. When filling positions, competence and qualifications are paramount; at the same time, we consider diversity to be a valuable asset to our company.

The Code of Conduct conveys our stance on ethical behavior, legal requirements, working conditions, safety, environmental protection, and the protection of information and property. It helps to avoid risks such as conflicts of interest, corruption, or inappropriate behavior, and ensures that we collectively adhere to the high standards we have set for ourselves.

Compliance with these guidelines is not only a legal obligation, but also an expression of our shared commitment to acting responsibly. All employees play a part in securing the trust of Voltatron AG's customers, business partners and the public.

This document is intended for all Voltatron AG employees, managers and business partners, and is designed to support them in making decisions that always align with the company's values and goals.

The Management Board of Voltatron AG

Martin Hartmann (CEO)

Florian Seitz (CFO)

Contents

Letter from the Management Board	2
Principles	6
1. Human rights, labor, and social standards	6
2. Health and safety.....	8
3. Corruption.....	9
4. Gifts and invitations	10
5. Conflicts of interest.....	12
6. Product safety	13
7. Protection of company property and the property of business partners	14
8. Antitrust law	15
9. IT security.....	16
10. Financial integrity.....	19
11. Environmental protection.....	20
12. Insider trading	23
13. Money laundering.....	24
14. Data protection	26
15. Whistleblower system	27
Guide to decision-making	28
Raising concerns and reporting violations.....	29
Contact person in the immediate working environment	30
Mandatory reporting of significant compliance violations.....	30
Further information	31
Imprint	32



Principles

1. Human rights, labor, and social standards

Voltatron AG is committed to respecting internationally recognized human rights, as well as fundamental labor and social standards.

Voltatron is particularly committed to the following **principles**:

- The abolition of all forms of child labor and forced labor,
- the principle of non-discrimination,
- fair remuneration and benefits in line with local market conditions,
- reasonable working hours, paid vacation, and
- access to medical care and health insurance.

Voltatron promotes **equal opportunities** in the labor market and rejects any form of discrimination, particularly on the basis of age, origin, gender, sexual orientation, skin color, religion, or disability.

Sexual harassment and any other form of harassment in the workplace are **strictly prohibited**.

Based on fair opportunities, every employee should be able to contribute their skills and motivation to their own self-fulfillment and for the benefit of Voltatron AG.

At Voltatron, we promote diversity and recognize it as a valuable asset to our corporate culture. All personnel decisions, including hiring, promotions and termination of employment, are guided by this.

2. Health and safety

The protection of the health and safety of all employees is a top priority for Voltatron AG.

All employees must comply with applicable occupational health and safety regulations at all times, and actively contribute to preventing health risks.

This includes the following **principles**:

- The statutory working time regulations must be observed.
- Each employee is responsible for safeguarding people and the environment within their own workplace.
- Recreational leave is beneficial to health; the vacation days to which each employee is entitled in the respective calendar year must be taken by April 30 of the following year.
- When driving company vehicles, the statutory driving and rest times must be strictly observed.

The health and safety of our employees is our top priority – we act responsibly and actively prevent risks.

3. Corruption

Voltatron AG conducts its business based on integrity, transparency, and fairness.

Relationships with business partners should solely be based on quality, reliability, competitive prices, and compliance with environmental, social, and ethical standards.

Integrity is one of our core values – we act as we would expect our business partners to act.

The following **principles** guide our actions:

- Any form of bribery is prohibited. This applies both to public officials and to employees of other companies.
- Employees may not demand, accept, offer, or grant any material or personal benefits that could give the impression of influencing business decisions.
- This includes, in particular, cash payments, gifts, entertainment offers, or other personal benefits.
- So-called “bribes” (small amounts of money or payments in kind to speed up administrative processes) are also not permitted.

If a business partner or public official offers or demands an improper advantage, the supervisor must be informed immediately.

4. Gifts and invitations

Gifts and invitations may only be given or accepted if they:

- Are within the scope of normal business practices,
- are considered a sign of politeness and
- no influence on business decisions can be expected.

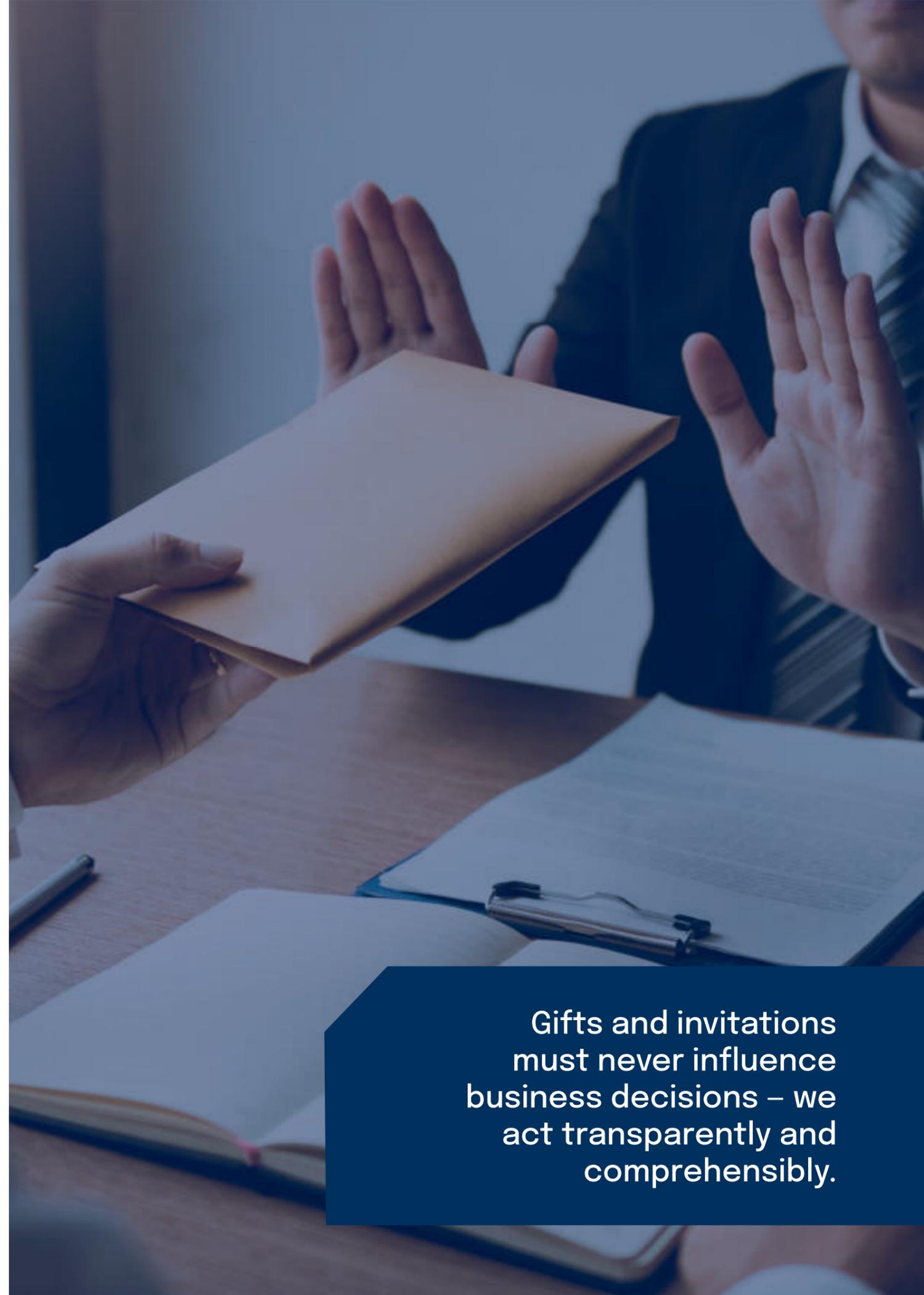
Gifts and invitations in connection with official company events or conferences are generally permitted, provided that their value does not exceed €50.

If it is not possible to refuse an inappropriate gift for reasons of courtesy, the supervisor should be informed so that a decision can be made on how to proceed (e.g., donation to a charitable organization).

In addition, we adhere to the following **principles**:

- Cash or monetary gifts may never be offered, granted, or accepted.
- In many countries, gifts or invitations above a certain value are considered taxable monetary benefits. Employees are required to comply with all relevant tax regulations.

In case of uncertainty, please consult compliance@voltatron.com.



Gifts and invitations
must never influence
business decisions – we
act transparently and
comprehensibly.

5. Conflicts of interest

A conflict of interest arises when an employee's personal or financial interests collide with, or could potentially conflict with, those of Voltatron AG.

All employees are required to avoid and disclose any actual or potential conflict of interest.

The following examples of conflicts of interest illustrate our **principles** in this area:

- Investments in or secondary employment with competitors, customers, or suppliers,
- personal relationships that could influence business decisions,
- the acceptance of benefits that go beyond what is customary in business.

All employees must ensure that business decisions are made solely in the best interests of Voltatron AG.

In case of doubt, the supervisor or the Compliance Department (compliance@voltatron.com) should be informed.

We make business decisions exclusively in the interests of Voltatron AG – if conflicts arise, we disclose them immediately.

6. Product safety

Our goal is to provide safe, high-quality products – based on our strong customer focus, we also set the highest standards for product safety.

Voltatron AG is committed to providing its customers with safe, reliable, and high-quality products at all times. Product safety is a central part of our responsibility to our customers, business partners, and society.

Our **principles** regarding product safety are as follows:

- Products must not have any defects or characteristics that could be harmful to health or property.
- All relevant legal regulations, standards, and internal quality standards must be strictly adhered to.
- Development, production, and testing processes must be designed in such a way that risks are identified and minimized at an early stage.
- Every employee is responsible for the quality and safety of the products in their own area of work.
- Security-related information must be communicated to customers and business partners in a transparent and complete manner.
- Defects or safety-related incidents must be reported immediately so that appropriate measures can be taken.

Through consistent product safety, we strengthen our customers' trust and ensure the long-term success of Voltatron AG.

7. Protection of company property and the property of business partners

The tangible and intangible property of Voltatron AG forms the basis for our economic success.

This includes buildings, facilities, tools, vehicles, IT systems, but also intellectual property such as trademarks, patents, trade secrets, and know-how.

We protect and respect intellectual property – we treat the goods, equipment, and data entrusted to us as if they were our own.

We therefore adhere to the following **principles**:

- Company property must be treated with care and used exclusively for business purposes.
- Information and business documents may not be disclosed without authorization or used for private purposes.
- The intellectual property of Voltatron AG and its business partners must be treated as confidential and protected.
- The loss, damage, or theft of company property must be reported immediately.

All employees share responsibility for protecting the property of Voltatron AG and the property of our customers, suppliers, and partners, and for using it properly.

8. Antitrust law

Voltatron AG is committed to free and fair competition. All employees are obliged to strictly comply with applicable antitrust laws.

In accordance with our **principles**, the following behaviors are strictly prohibited:

- Agreements or concerted practices between competitors (“horizontal agreements”) on prices, customers, markets, or offers,
- exchange of sensitive information with competitors, such as prices, costs, strategies, or market shares, as well as
- agreements between suppliers and customers (“vertical agreements”) that restrict competition.

Informal or indirect coordination may also be considered a violation of antitrust law.

Increased vigilance is required at association or industry meetings. No confidential market information may be exchanged there, and even the appearance of an anti-competitive agreement must be avoided.

If you have any doubts about the antitrust legality of an action, consult the Compliance Department (compliance@voltatron.com) at an early stage.

We are committed to free and fair competition and strictly reject any form of anti-competitive agreements.

9. IT security

The responsible use of information technology and digital data is of central importance for the protection of the company and its business partners.

Every employee shares responsibility for the security of the IT systems.

The following **principles** must therefore be strictly observed:

- Access data, passwords, and authentication procedures must not be disclosed to third parties.
- Unknown emails, attachments, or links should be treated with particular caution in order to avoid cyberattacks.
- Software may only be used or installed if it has been approved by the IT department.
- Security incidents or suspicious activities must be reported to the IT department immediately.

Through consistent IT security, we not only protect Voltatron AG's systems and data, but also strengthen the trust of our customers, suppliers, and partners.

Protecting our systems and data is crucial to the stability and success of the Voltatron Group. By using IT responsibly, each and every one of us contributes to the security of the company.



10. Financial integrity

Our company's business transactions and documents must be accurate and proper. We record and document all business transactions, assets, and liabilities in accordance with Voltatron AG's financial reporting rules and legal requirements.

To ensure proper documentation and storage of records, the highest level of accuracy, completeness, and accountability are essential in all business processes.

Therefore, we adhere to the following **principles**:

- Documents relevant to financial accounting must not be deliberately provided with false or misleading entries.
- We comply with tax regulations and fulfill our tax obligations. If we have any questions, we contact the Voltatron finance department.
- We report irregularities or suspected cases immediately and transparently to the responsible internal departments in order to ensure compliance with our financial guidelines.

Our top priority is to ensure that all business transactions and documents are recorded correctly and in full, in accordance with legal requirements and Voltatron AG's financial reporting rules – transparency is essential for us to ensure the integrity of our financial processes.

11. Environmental protection

Voltatron AG is committed to the responsible use of natural resources and to the continuous improvement of its environmental performance.

We are working intensively to embed sustainability and environmental protection even more deeply as integral components of our corporate strategy.

We therefore commit ourselves to adhering to the following **principles**:

- Energy, water, and raw materials must be used efficiently and waste must be avoided.
- Emissions, waste, and noise must be reduced to the necessary minimum.
- Environmentally friendly technologies and materials are preferred.
- All employees are required to ensure compliance with environmental laws and internal guidelines.
- Environmental risks must be identified at an early stage and appropriate measures must be taken to minimize them.

Voltatron AG sees environmental protection as a shared responsibility of all employees and partner companies.



We take responsibility for our environment by using resources efficiently and consistently reducing emissions and waste. This is a central component of our corporate strategy – supported by innovation, sustainable technologies, and the commitment of all our employees and partners.

We act responsibly and in accordance with applicable laws to ensure fairness and integrity in the financial markets.

12. Insider trading

Insider information is any fact that is not publicly known and that could significantly influence the price of securities or financial instruments.

Voltatron AG is committed to strict compliance with all insider trading regulations. The handling of confidential information requires particular care and responsibility, as violations not only have legal consequences but also jeopardize trust in our company.

Our **principles** regarding insider trading are as follows:

- Insider information may not be used for trading in securities or financial instruments, nor may it be disclosed to third parties.
- Employees who have access to insider information are obliged to treat it confidentially and use it exclusively for business purposes.
- Any disclosure of insider information is prohibited.
- If you are unsure about how to handle confidential information, consult the Compliance Department (compliance@voltatron.com) immediately.
- Violations of insider trading regulations will be prosecuted consistently and may result in criminal and labor law consequences.

By strictly adhering to these principles, Voltatron AG protects its employees, business partners, and shareholders from legal and reputational risks and contributes to the integrity of the financial markets.

13. Money laundering

Voltatron AG undertakes to comply with all applicable national and international regulations for the prevention of money laundering and terrorist financing.

The aim is to ensure that no business relationships or transactions are used to conceal the illegal origin of funds or assets.

Our **principles** regarding money laundering are as follows:

- Transactions may only be conducted with reputable, identifiable business partners.
- Unusual or unclear payment methods should be avoided.
- Cash payments or payments via third parties are only permitted if they are legally permissible and documented in a traceable manner.
- All employees are required to report suspicious transactions immediately.

Any person who receives information about possible money laundering or terrorist financing in the course of their work must immediately contact the Compliance Department (compliance@voltatron.com) of Voltatron AG.

Consistent compliance with these regulations serves to protect Voltatron AG and its employees from legal and reputational risks.

We conduct thorough checks on our business partners and transactions to ensure that our business activities are not misused for illegal purposes.



14. Data protection

Voltatron AG is committed to protecting all personal data of employees, customers, suppliers, and business partners.

Data is always handled in accordance with applicable data protection laws, in particular the General Data Protection Regulation (GDPR).

The protection of personal data is an expression of our respect – we act in accordance with the highest data protection standards.

Our **principles** for compliance with data protection are:

- Personal data will only be collected, processed and used if permitted by law or if expressly authorized by the individuals concerned.
- Access to personal data is restricted to employees who need this information for their work (“need-to-know principle”).
- All data must be treated confidentially and stored securely.
- When passing on data to third parties, it must be ensured that data protection regulations are complied with.
- Data breaches must be reported immediately to the data protection officer at Voltatron AG.
- The protection of personal data is an expression of respect for each individual and contributes significantly to trust in our company.

15. Whistleblower system

Voltatron AG promotes an open corporate culture in which lawful and compliant behavior is standard practice.

Employees, business partners, and third parties are expressly encouraged to report any violations of laws, internal guidelines, or this Code of Conduct.

Our whistleblower system is based on the following **principles**:

- Information can be provided confidentially and anonymously if desired.
- Every tip is carefully reviewed and, if necessary, investigated.
- Whistleblowers are protected from discrimination or reprisals.
- Abuse of the system, such as deliberately false accusations, will not be tolerated.

Violations can be reported via internal reporting channels or the official whistleblower system of Voltatron AG.

The Company ensures that every report is treated fairly, confidentially, and transparently.

We promote an open culture of transparency, error management, and entrepreneurship – we view reports of violations as an opportunity to improve. Whistleblowers are protected in all cases.

Guide to decision-making

If a situation arises in which there is uncertainty as to whether a decision complies with the requirements of the Code of Conduct, the following questions can help you to reflect on and assess your own actions.

- Could I easily justify my decision to third parties?
- Have I considered all the issues that I consider relevant and weighed them up appropriately?
- Is my decision in line with legal regulations and internal guidelines?
- Can I reconcile the decision with my own conscience and the values of Voltatron AG?
- Am I acting in the best interests of the company and free from personal or financial self-interest?
- Could my decision have a negative impact on the reputation of Voltatron AG?
- Would I still make the same decision if it became public knowledge (“newspaper test”)?

If you can answer “yes” to each of these questions, your decision is probably justifiable.

If you have any questions regarding any of these issues, please contact the Compliance Department (compliance@voltatron.com).

Raising concerns and reporting violations

Concerns about misconduct by colleagues and supervisors in the workplace can often be resolved through open, constructive dialogue between the parties involved or through trained mediators.

However, if serious issues arise—particularly in the case of possible illegal business practices or compliance violations – it is usually necessary to address them confidentially and in a protected area outside of the personal work environment.

Employees who report actual or suspected misconduct to the best of their knowledge and belief are expressly protected from being disadvantaged or experiencing reprisals as a result of their disclosure. Reports can be made confidentially and, if desired, anonymously. Every report is carefully reviewed, documented, and – if necessary – investigated.

Contact person in the immediate working environment

If you have any questions about this Code of Conduct or wish to report violations of the Code or compliance guidelines, you can contact someone in your immediate work environment, such as:

- Your immediate supervisors,
- the company management,
- the compliance@voltatron.com, or
- your contacts in the HR department.

Mandatory reporting of significant compliance violations

Those managers and employees who, based on their position or role, bear exceptional responsibility for complying with this Code of Conduct are particularly obliged to report any misconduct. They must therefore immediately report any concrete evidence or initial suspicion of a significant compliance violation. In such cases, the Compliance Department (compliance@voltatron.com) must be informed immediately. Finally, this principle also applies as a request to all other employees who become aware of violations of the rules.

The reporting obligation applies, for example, to:

- Economic crimes (e.g., theft, fraud, corruption, breach of trust, embezzlement),
- violations of antitrust law or foreign trade law,
- violations of human rights, sexual harassment, or violations of anti-discrimination laws,
- violations that could lead to investigations by regulatory or law enforcement authorities (e.g., supervisory authorities, public prosecutors).

If there is any uncertainty as to whether a particular behavior or incident constitutes a compliance violation, the Compliance Department (compliance@voltatron.com) should be consulted at an early stage.

Further information

Further information on the Code of Conduct and compliance at Voltatron can be found at <https://ir.voltatron.com/corporate-governance> and on the Voltatron intranet.

The Compliance Department is available by phone or email:

compliance@voltatron.com

Tel. +49 (0) 911 377 175 - 100

Imprint

VOLTATRON AG

Flößbastraße 22

90763 Fürth

+49 (0) 911 377 175 - 100

compliance@voltatron.com

www.voltatron.com