

The ION-WAY Code of Conduct

The background of the entire page is a long-exposure photograph of a highway at night. The road surface and lane markings are blurred into streaks of light, with blue and white streaks on the left side and red and orange streaks on the right side, suggesting the movement of vehicles. The overall scene is dark, with the light trails providing the primary visual interest.

ionway

BATTERY MATERIALS
FOR THE EV TRANSITION

Dear Colleagues, Partners, and Stakeholders,

At IONWAY, we are committed to making electric mobility successful, for a better planet, we support the energy transition.

We have the ambition to become PowerCo's preferred supplier of battery materials. We base our success on synergies, Umicore's technology, sustainable operations, resilience and sustainability in our value chain, large scale, cost competitiveness and operational excellence. As we navigate the challenges and opportunities in our industry, it is essential that we uphold the highest ethical standards and that is why we have created the ION-WAY.

Starting from the IONWAY values, the ION-WAY defines our actions and decisions, ensuring that we remain true to our mission and vision. Below you find the IONWAY values:



Collaboration: Trustworthy, supportive, open and honest, we are stronger together. Partnership is in our DNA as the powerful union that leads the way to e-mobility for all. Our collaborative spirit drives us to learn from and support each other to realize our ambition.



Operational Excellence: We set high standards, are performance driven, take initiative and aim for continuous improvement. We radically apply lean principles to everything we do, and we take accountability for our decisions and actions.



Respect: We treat every human fairly and understand each other's differences and our different roles. We welcome diversity in opinions, mindsets and thought processes as they strengthen our collaboration.



Responsibility: We are responsible for ourselves, for each other and the environment. We act with care towards one-self and all human beings when it comes to health, mental wellbeing and safety. We are empowered to perform with an adequate level of autonomy and accountability to IONWAY.



Positivity: We bring energy and enthusiasm to our work, the processes that we use, our customer and our partners. We happily share the brighter future we are building and pride ourselves in making clean mobility a reality for everyone.



Entrepreneurial Spirit: We encourage each other to not only see problems but to seek out solutions and opportunities. We stay true to our vision and forge the path that shapes the future.

The ION-WAY is not just a document – it is a pledge that each of us makes to adhere to these values in our daily work. The ION-WAY defines our interactions with our colleagues, our customer, business partners, suppliers, and other stakeholders and provides us with practical advice and guidance. It allows us to recognize misconduct and abuse and respond appropriately.

Its main purpose is to ensure that all persons acting on behalf of IONWAY perform their activities ethically and in accordance with laws, regulations and the company and ISO standards, incl. the requirements of interested parties, IONWAY sets through its policies, guidelines, rules and values. When we speak about IONWAY, this refers to IONWAY BV and to all majority-owned subsidiaries.

The ION-WAY is also the basis for IONWAY's Management System (Quality, EHS – Environment, Health & Safety, Energy and Information Security) objectives.

The ION-WAY applies to all (temporary) employees and all consultants working for IONWAY.

As we move forward, we ask each one of you to embrace the ION-WAY and integrate its values into everything you do. We encourage each one of you to ***stay true to our vision and forge the path that shapes the future.***

Thank you for your unwavering commitment to upholding these values and making IONWAY a beacon of ethical business practices. Thank you for your dedication to making IONWAY a company we can all be proud of.



BATTERY MATERIALS
FOR THE EV TRANSITION

The IONWAY Index

1. OUR WORKPLACE	5
1.1 Human Rights, Health and Safety and Wellbeing.....	6
1.2 Diversity, Inclusion and Engagement of our employees	8
1.3 Environment.....	12
1.4 Concluding remarks	14
2. OUR MARKETPLACE	15
2.1 Privacy, data protection and confidential information.....	15
2.2 Our Reputation.....	17
2.3 We RESPECT the law	18
2.3.1 Anti-corruption, anti-money laundering, antitrust, export controls and trade sanction regulations	18
2.3.2 Improper advantages and conflicts of interest.....	21
2.3.3 Contracts and Activities with a competitor, supplier or other business associates	22
2.3.4 Customers, Partners, suppliers and procurement	24
3 We Respect the ION-WAY and report any breaches.....	27
3.1 Whistleblowing	27
3.2 Non-compliance	29
4 Future revision	30

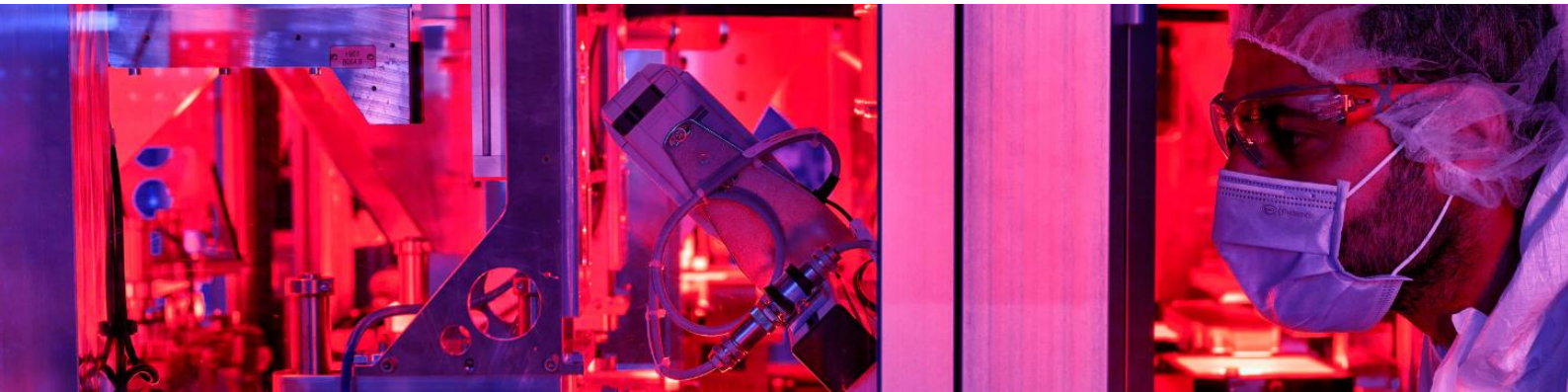
1. OUR WORKPLACE

We are all ambassadors of IONWAY, and our actions must align with our values and the ethical standards outlined in this document.



At IONWAY, we believe that leadership is not just about managing teams and making decisions but also about setting a standard for ethical behavior and creating a culture of integrity. All leaders, from managers to executives, have a critical role in upholding the principles of our ION-WAY and leading by example. To that end, leaders are expected to:

1. **Model Ethical Behavior:** Demonstrate the values and behaviors outlined in the ION-WAY in all their actions and decisions, both internally and when representing the company externally.
2. **Create a Supportive Environment:** Foster a work environment where team members feel comfortable raising questions, voicing concerns, or reporting potential violations without fear of retaliation.
3. **Communicate Clearly and Consistently:** Regularly communicate the importance of ethical conduct and ensure that all team members understand their responsibilities and expectations.
4. **Encourage Transparency and Accountability:** Promote a culture of openness where feedback is valued, and accountability is encouraged at every level of the organization.
5. **Address Violations Promptly:** Take immediate and appropriate action when aware of any violations of the ION-WAY, ensuring fair treatment and due process.



1.1. Human Rights, Health and Safety and Wellbeing



At IONWAY, we RESPECT, protect, and promote the globally applicable regulations for the protection of human and children's rights (hereinafter human rights), such as the UN Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights, as fundamental principles. We reject any use of child labor, forced and compulsory labor, as well as any form of modern slavery and human trafficking.

We preserve IONWAY Employees' rights to association and collective bargaining, as provided by applicable laws and maintain compliance with legal and safety provisions ensuring welfare at work and fair working conditions, including regulations on working hours and compensation.

The health, safety, and security of IONWAY Employees and third parties in the workplace are paramount. This commitment is upheld by the Health & Safety governance established by IONWAY. Environmental, Health & Safety (EHS), Security are integrated to our operations, and we approach them with the same dedication as any business-related activities. IONWAY's operations comply with applicable Environmental, Health & Safety, Security laws and regulations, with company and ISO standards, with requirements of interested parties and best practices. EHS risks are systematically analyzed, assessed, and mitigated or eliminated as necessary. We employ EHS professionals at all sites to support the systematic implementation of EHS, in close consultation with the IONWAY employees.



We act with care towards one-self and all human beings when it comes to Health & Safety, (mental) wellbeing. We are empowered to perform with an adequate level of autonomy and accountability to IONWAY.

At IONWAY we are committed to fostering a workplace environment that prioritizes the (mental) wellbeing of every employee. We recognize that mental health is as important as physical health, and we strive to create a supportive atmosphere where individuals feel comfortable seeking help when needed.

As part of our commitment to mental wellbeing, we encourage open dialogue, respect work-life balance, and provide necessary accommodations to help employees thrive both personally and professionally. By supporting each other in maintaining mental wellness.

THE ION-WAY

We prioritize human rights, fair labor practices, and the health & safety, and security of our employees, adhering to strict EHS standards through continuous risk assessment and dedicated professionals.

We are committed to sustainability of the Earth and minimizing environmental impact, actively addressing circular economy and climate change as part of our mission.

How?

Building up and Maintaining a strong EHS Management System and Sustainability Governance Model including Audit Programs in all our Value Chain ensuring compliance with EHS and Sustainability requirements and identify potential risks in the workplace.

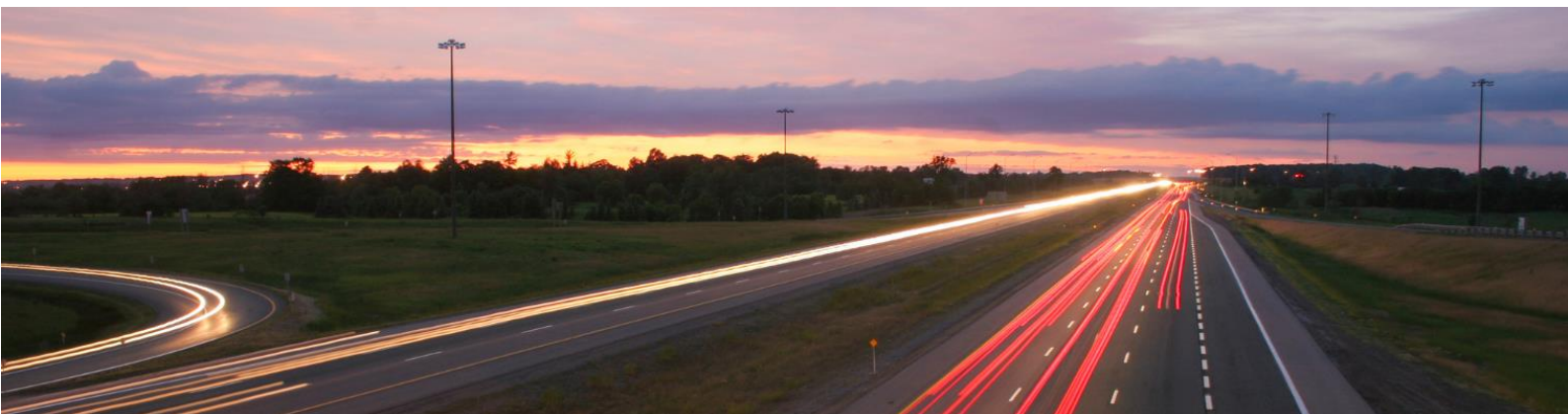
6S

All employees take responsibility for the safety aspects of the workplace by actively participating in 6S Audits

Encouraging Mental Wellbeing

Managers and team leaders ensure that workloads are balanced, avoiding burnout by encouraging employees to take breaks, use their vacation days, and avoid after-hours work whenever possible.

By fostering a culture of open communication about stress and workload, IONWAY creates a more balanced and mentally healthy workplace.



1.2. Diversity, Inclusion and Engagement of our employees



At IONWAY, equal opportunities and equal treatment are essential cornerstones for fair, unprejudiced, and open interaction. ***We are stronger together. Partnership is in our DNA as the powerful union that leads the way to e-mobility for all. Our collaborative spirit drives us to learn from and support each other to realize our ambition.***

We are dedicated to creating an environment that brings the power of diversity to life. We embrace diversity, advocate for inclusion, and cultivate

a POSITIVE and safe environment that reflects and honors the individuality of each Employee. Our goal is to foster a space where people from diverse backgrounds and experiences can thrive in both their professional and personal lives. When people from different backgrounds, cultures, genders, and experiences come together, they bring unique viewpoints that foster creative solutions and innovation. At IONWAY we are convinced that, embracing diversity and inclusion is both a moral imperative and a strategic advantage for IONWAY.



We treat every human fairly and understand each other's differences and our different roles. We welcome diversity in opinions, mindsets and thought processes as they strengthen our COLLABORATION.

IONWAY is committed to an inclusive work culture that recognizes and values the uniqueness of every individual. We respect all Employees for their individual abilities and do not tolerate any form of harassment or discrimination based on gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age, or political opinion.

All persons within IONWAY or with whom IONWAY Employees interact must be treated with respect, dignity, and inclusivity. Employees are

expected to be open, fair, and honest in their professional activities and expression of views and must conduct themselves in accordance with applicable laws and regulations.

Employment decisions at IONWAY must not and will never be based on age, gender, birth, ethnicity, social or cultural background, religious or philosophical beliefs, political or synodical opinions, family or marital status, wealth, sexual orientation, or physical or mental disability. These commitments apply to all aspects of employment, including recruitment, hiring, compensation, evaluation, promotion, and termination.

At IONWAY we uphold and respect the rights of minorities and Indigenous Peoples in all aspects. Where applicable we respect the right to Free, Prior, and Informed Consent (FPIC) for any developments that affect Indigenous Peoples and the lands they inhabit. We will engage in meaningful consultation with Indigenous communities to ensure that their voices are heard and their rights protected throughout all stages of development of our plants.



Our annual engagement survey is a vital tool. By seeking your honest feedback, we identify areas where we excel and opportunities for improvement, ensuring we maintain the highest standards in our operations. This commitment to operational excellence drives us to continually refine our processes and enhance our performance.

Simultaneously, the survey encourages an entrepreneurial spirit by giving you a voice in shaping our company's future. Your insights and innovative ideas help us to adapt, innovate, and stay ahead in a dynamic market. Through this collaborative effort, we harness the collective creativity and initiative of our team, fostering a culture of continuous improvement and forward-thinking.

THE ION-WAY

We live diversity, advocate for inclusion, and create a safe environment where every Employee's individuality is recognized and valued. We strive to ensure that our workplace is one where everyone feels respected and empowered to contribute their best.

By adhering to these principles, we not only comply with laws and regulations but also uphold our core values of fairness, respect and inclusivity in all our interactions and decisions.

How?

Inclusive Team Meetings: During team discussions, we actively ensure that all voices are heard, particularly those who may be quieter or come from underrepresented groups. We take the time to hear and understand different perspectives.

Open Door Policy for Feedback and Ideas: Leaders and managers maintain an open-door policy, encouraging employees from all backgrounds to share their feedback, concerns, or ideas without fear of judgment or retaliation.

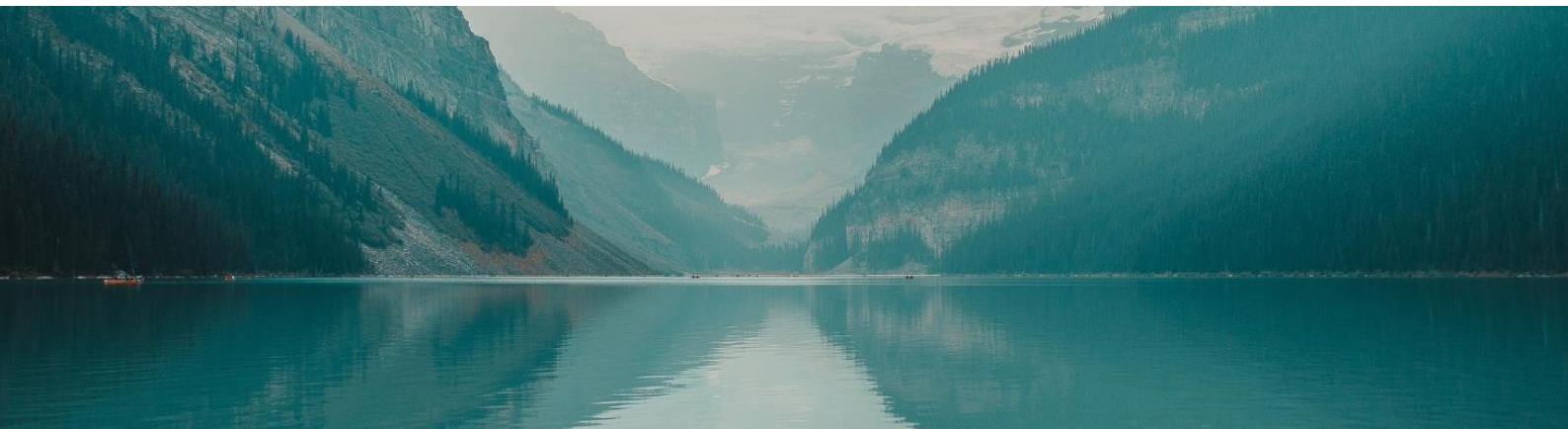


1.3. Environment



IONWAY recognizes its unique responsibility for the environment and is committed to sustainable practices that protect and preserve it for current and future generations. We take full responsibility for the sustainability of our production, locations, products, and services, utilizing environmentally friendly, advanced, and efficient technologies throughout the entire production lifecycle. We encourage the same practices in our value chain by: from caring our customers' needs on their sustainability and green transition practices, partnership with governmental, non-governmental and science organizations to enhancing the sustainability and green transition activities in our contractors and suppliers.

We aim to continuously reduce our environmental impact and fully comply with environmental protection laws and regulations, as well as increasing our positive impact wherever possible and practicable. IONWAY expects all employees to consider the environmental impact of their actions, striving to reduce resource consumption and minimize waste, emissions, and other pollutants.





We strive for OPERATIONAL EXCELLENCE through continuous improvement wherever possible and economically viable. We proactively seek to employ new, more sustainable technologies and processes to minimize our impact on people and the environment. We continuously strive to improve our Integrated Management System.

We take initiatives that positively impact energy consumption and energy performance. We continuously develop our products for improved sustainability and strive for the highest product quality. Initiatives to reduce resource consumption, waste generation, and environmental pollution are actively pursued, addressing climate change and green transition efforts.

THE ION-WAY

We dedicate ourselves to environmental protection and sustainability, using advanced technologies to minimize environmental impact and comply with regulations. We are expected to consider and reduce their environmental impact, including resource consumption and pollution.

How?

Sustainable Resource Usage

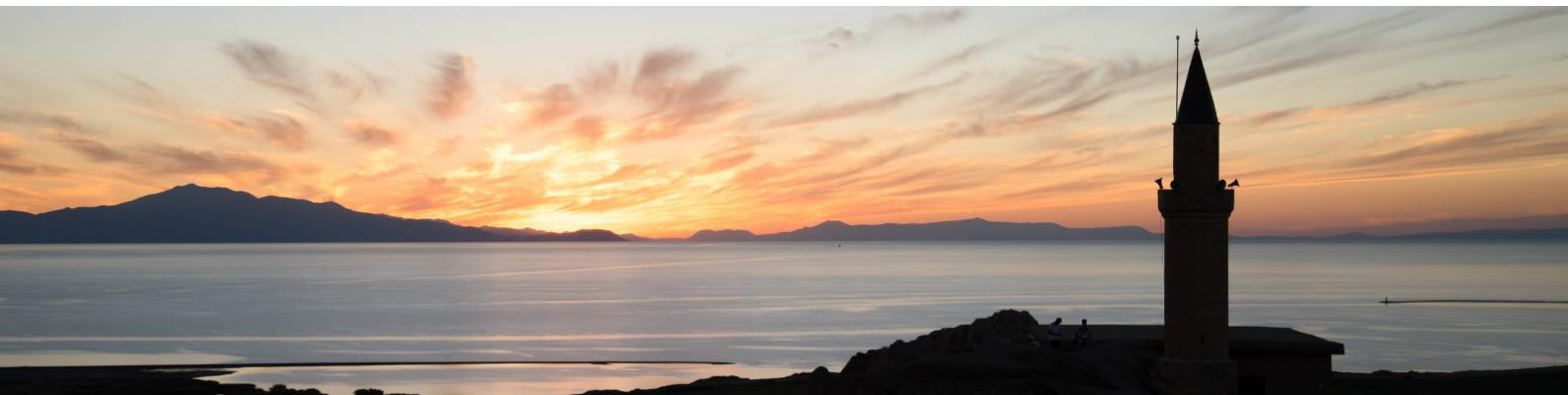
Employees are mindful of resource consumption in daily operations. Team members actively look for ways to reduce resources usage including water, energy, paper usage by opting for digital documentation and sharing and striving for a paperless office; and to reduce usage of single-use plastics. In our operations, we aim to minimize resource usage by enhancing operational excellence and efficiency. We emphasize best-in-class waste management practices to improve our transition from waste to a circular economy.

1.4. Concluding remarks

Every Employee is personally responsible for safety, health, and environmental protection and security at the workplace to the full extent required by their duties, to the best of their knowledge, ability, and experience, while managers hold overall responsibility for EHS and Security. We are all encouraged to identify areas for improvement and continuously work towards enhanced safety and a better environment.



We are responsible for ourselves, for each other and the environment.



2. OUR MARKETPLACE



We ensure the continued success and reputation of IONWAY, fostering an environment of trust, security, and integrity for our employees, partners, and stakeholders.

2.1. Privacy, data protection and confidential information



We bring energy and enthusiasm to our work, the processes that we use, our customer and our partners. We happily share the brighter future we are building and pride ourselves in making clean mobility a reality for everyone. While IONWAY values openness and transparency, this does not conflict with the need to protect information that is crucial to its business interests and the business interests of our shareholders.


We are committed to the responsible and ethical use of our company's assets and the preservation of confidentiality. All employees are entrusted with the responsibility to protect IONWAY's physical, intellectual, and financial assets against loss, theft, and misuse. This includes safeguarding our facilities, equipment, technology, and proprietary information.



Confidentiality is paramount to maintaining the trust and integrity of our business operations. All Employees must ensure that sensitive information, including technology, trade secrets, financial data, and personal information, is handled with the utmost care and disclosed only to authorized individuals, in line with IONWAY's Confidential Information Policy and all applicable laws.

Employees are required to treat personal data with professionalism and respect for privacy, adhering to the following principles:

- Personal data should always be considered confidential and accessed or disclosed only when authorized and necessary for professional purposes.
- Personal data must be collected and used solely for clearly defined and legitimate professional purposes.
- IONWAY strives to be transparent in its data use and to provide fair value in exchange for it to customers and staff.



Any information beyond general business knowledge and work experience that employees learn through their work at IONWAY must be considered and treated as confidential. Employees should adhere to the rules against disclosing or using such confidential information for personal benefit, either for themselves or others.

2.2. Our Reputation

THE ION-WAY

We are committed to protecting confidential and personal data, requiring employees to handle such information securely and in compliance with all applicable laws and policies.

Employees must treat all sensitive information, including intellectual property, with professionalism and confidentiality, ensuring it is used only for authorized and legitimate purposes.

How?

Limiting Access to Sensitive Information: Employees only access personal or confidential data when it is necessary for their job responsibilities.

Secure Handling of Data

Employees ensure that confidential information, such as customer data or intellectual property, is stored securely by using encrypted storage systems and password-protected files.



It is crucial for IONWAY that all communications are accurate, up to date, complete, adequate, and timely. Employees must obtain specific authorization before making public statements or publishing written content on behalf of IONWAY, unless legally required. Without such authorization, employees—while their freedom of speech is respected by IONWAY—should not claim to represent the company when engaging in public debates as private individuals. On social media the same rules apply and in addition, employees are responsible for their posts and, if they link to IONWAY on their profiles, they must avoid sharing content that could harm the company's reputation.

THE ION-WAY

We ensure all communications are accurate and authorized, and they should not represent IONWAY without permission, especially in public or on social media, to avoid harming the company's reputation.

How?

Responsible Social Media Usage: When sharing content on their personal profiles, they ensure that any references to IONWAY are respectful, accurate, and compliant with the Social Media Guidelines and with the External Communications Policy to protect IONWAY's reputation.



2.3. We RESPECT the law

2.3.1 Anti-corruption, anti-money laundering, antitrust, export controls and trade sanction regulations

Allegations of corruption, bribery, or similar fraud — whether proven or not — can severely damage IONWAY's business and reputation. Therefore, all employees must adhere to applicable anti-corruption and anti-bribery laws. Employees are strictly prohibited from directly or indirectly giving or offering anything of value to a third party, or requesting or accepting anything of value that could be perceived as an unfair advantage. They must be especially vigilant not to engage in offering or accepting improper gifts, hospitality, or payments, including gratuities, kickbacks, bribes, or payoffs where (an agent of) a government official is involved.

The quality of our products and services is fundamental to our success, and any form of corruption is strictly prohibited as it leads to biased decisions, stifles innovation, distorts competition, and harms society. When interacting with officials, government authorities, and public institutions, our engagements must be strictly lawful. Employees are also required to thoroughly verify the identities of customers, partners, and other third parties to ensure we only conduct business with legitimate and reliable entities.



We set high standards, are performance driven, take initiative and aim for continuous improvement, in all business transactions, relationships and partnerships. We therefore prohibit all types of fraud.

We must all comply with anti-money laundering laws, and ensure all business dealings are lawful and with legitimate entities. Money laundering occurs when the proceeds of a crime are hidden in legitimate business dealings, or when legitimate funds are used to support criminal activities, including terrorism. We must all be on our guard for this and help protect IONWAY's reputation.

We treat all of our partners and clients in a similar way, and where there is a different treatment, this can solely be based on objective criteria.

We comply with all applicable antitrust and competition laws. Compliance with this legislation ensures there is no undue distortion of competition in the relevant markets. In particular, agreements and concerted practices between competitors with the intention or the effect to prevent or restrict competition are prohibited. No Employee should assume that IONWAY's interests ever require otherwise.

We comply with all applicable export controls, trade laws, and economic sanctions regulations in the jurisdictions where we operate (trade compliance). Trade compliance includes regulations governing the import, export and domestic trading of goods, technology, software and services as well as international/European economic sanctions. By complying, we help IONWAY to continue doing business internationally.

THE ION-WAY

We comply with all applicable laws and in particular with anti-corruption, anti-money laundering, antitrust, export controls and trade sanction laws. We avoid offering or accepting unfair advantages, and ensure all business dealings are lawful and with legitimate entities, as any form of corruption or fraud can severely damage IONWAY's business and reputation. Corruption is strictly prohibited as it leads to biased decisions, stifles innovation, distorts competition, and harms society, with severe penalties for unintentional involvement in money laundering.

How?

Compliance: Employees must comply with all relevant laws, especially those related to anti-corruption, anti-money laundering, antitrust, export controls, and trade sanctions.

Ethical Business Practices: Fairness is prioritized in business dealings. Employees are required to avoid offering or accepting unfair advantages and ensure all transactions are lawful and conducted with legitimate entities.

2.3.2 Improper advantages and conflicts of interest

We do not seek improper advantages for ourselves or close relations that could harm IONWAY's interests, including financial performance, environmental health and safety, security, or commercial and public reputation. Employees must avoid participating in or influencing decisions that could lead to actual or perceived conflicts of interest, whether through personal or familial interests.

Decisions should be made based solely on factual criteria, free from personal biases or relationships.

Any actions intended to breach, deceive, or circumvent applicable rules to gain undue advantages for oneself or others are strictly prohibited. This includes stealing or unlawfully obtaining funds, goods, or data, altering or destroying documents, and laundering proceeds of illegal activities.



THE ION-WAY

We do not seek improper advantages for ourselves or close relations that could harm IONWAY's interests, and employees must avoid conflicts of interest and make decisions based solely on factual criteria. Any actions intended to gain undue advantages, including stealing, altering documents, or laundering proceeds of illegal activities, are strictly prohibited.

How?

Avoiding Improper Advantages: Employees are prohibited from seeking improper advantages for themselves or their close relations, particularly those that could damage IONWAY's interests.

Conflict of Interest: Employees must avoid conflicts of interest and base their decisions solely on factual, objective criteria to ensure fairness in all actions.

2.3.3 Contracts and activities with a competitor, supplier or other business associates

Before engaging in any activity that may be perceived as promoting the interests of a competitor, supplier, or other business partner at the expense of IONWAY's interests, including serving on their board, we always consult with our direct supervisor or the local People & Organization Manager. We do not market products or services that compete with IONWAY's business activities or broader interests.





We take accountability for our decisions and actions. To ensure consistency, compliance, cost-effectiveness, and risk control in IONWAY contracts, employees must ensure that no service is delivered to a customer, and no service is provided by a partner, supplier, service provider, or subcontractor, until the contract has been duly reviewed, approved, and signed by an authorized IONWAY representative. Once a contract is signed, employees must ensure it is properly filed, and its performance is monitored over time.

THE ION-WAY

Before engaging in activities that might promote a competitor's, supplier's, or business partner's interests over IONWAY's, employees must consult with supervisors, avoid marketing competing products, and ensure contracts are reviewed, approved, signed, filed, and monitored for performance.

How?

Consultation with Manager: Before engaging in any activity that might promote a competitor's, supplier's, or business partner's interests over IONWAY's, employees are required to consult with their manager for guidance and approval.

Contractual Diligence: To safeguard IONWAY's interests, all contracts must be thoroughly reviewed by legal, approved, signed, properly filed, and continuously monitored for performance to ensure compliance and fulfillment of obligations.

2.3.4 Customers, partners, suppliers and procurement



Our commitment to quality excellence requires all employees to adhere strictly to customer quality requirements and uphold applicable ISO certification standards. We are dedicated to continuous improvement and consistent delivery of products and services that meet or exceed these standards, reflecting our promise to maintain integrity, reliability, and customer satisfaction in every aspect of our work. On a daily basis we are ensuring that our products and processes meet the highest standards of quality.

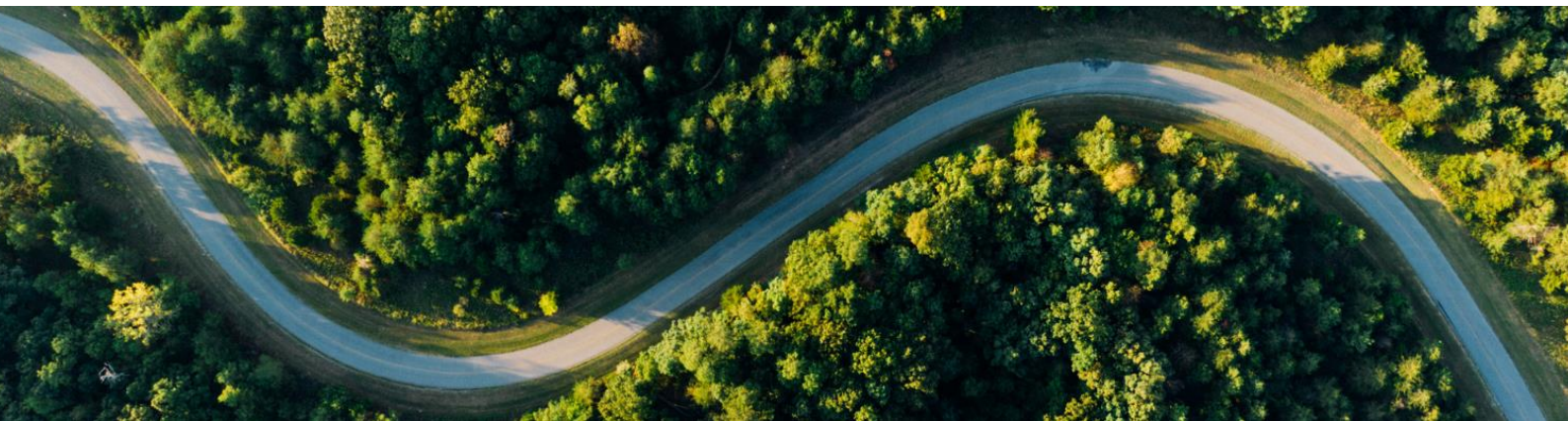
At IONWAY, it is crucial that all partners, suppliers, service providers, and subcontractors we engage with are treated fairly and are trustworthy. We expect them to support open and honest collaboration, ensuring that they do not expose IONWAY, its employees, customers, or other stakeholders to unnecessary risks and they operate with the highest environmental and social standards and all other practices mentioned in the ION-WAY.



Both IONWAY and Suppliers are expected to conduct all business dealings with full transparency and integrity. This includes ensuring that all financial transactions are accurately and truthfully recorded in IONWAY's financial reports and filings. We expect from our suppliers that they maintain an adequate system of internal controls to ensure the reliability and accuracy of financial reporting.

Any discrepancies, inaccuracies, or misrepresentations in financial documentation must be promptly addressed and corrected. Suppliers should also ensure that their financial reporting practices comply with all applicable laws, regulations, and industry standards.

Suppliers are responsible for understanding and adhering to all relevant laws and regulations, in particular those that govern the export, re-export, transfer, and sale of goods, services, software, and technology. This includes ensuring that no transactions or activities are conducted with restricted countries, entities, or individuals as designated by relevant governmental authorities. Suppliers should regularly review and update their compliance programs to reflect changes in legal requirements and ensure ongoing adherence to all applicable laws.



We are responsible for ourselves, for each other and the environment and we expect the same of our suppliers: they are expected to commit to environmental responsibility by pursuing carbon neutrality, defined as achieving a net zero carbon footprint. This involves balancing carbon emissions with an equivalent amount sequestered, offset, or eliminated through sustainable practices. Suppliers should work to reduce energy consumption, enhance energy efficiency, and transition to renewable energy sources to achieve net zero emissions. In addition to carbon neutrality, suppliers should promote circularity by supporting closed-loop systems that prioritize the use of sustainable and renewable natural resources.

Efforts should be made to minimize waste, increase reuse, and maximize recycling throughout the supply chain. Furthermore, suppliers are required to manage chemicals responsibly by identifying, minimizing, or eliminating the use of restricted substances in manufacturing processes and finished products. This is essential to ensure compliance with all relevant regulations and to protect both the environment and human health.

IONWAY is dedicated to applying the principles of the ION-WAY to its relationships with these stakeholders. To the extent relevant, we aim to incorporate these principles and rules through due diligence, firm contractual obligations, and other related measures, without undermining the preliminary screening of stakeholders conducted by IONWAY.

We are contractually engaged with a significant number of suppliers and service providers and take great care in selecting them, with our procurement team always involved in the process.

THE ION-WAY

We incorporate our ION-WAY in contractual relationships with suppliers and partners, selecting them with great care and involving our procurement team in every engagement.

How?

Ethical Charter in Contracts: IONWAY ensures that its ethical values are embedded in all contractual agreements with suppliers and partners, reflecting the company's commitment to integrity and responsible business practices.

Careful Selection of Suppliers and Partners: Employees are expected to select suppliers and business partners with great care, prioritizing those who align with IONWAY's ethical standards and values. In every engagement the procurement team is engaged.

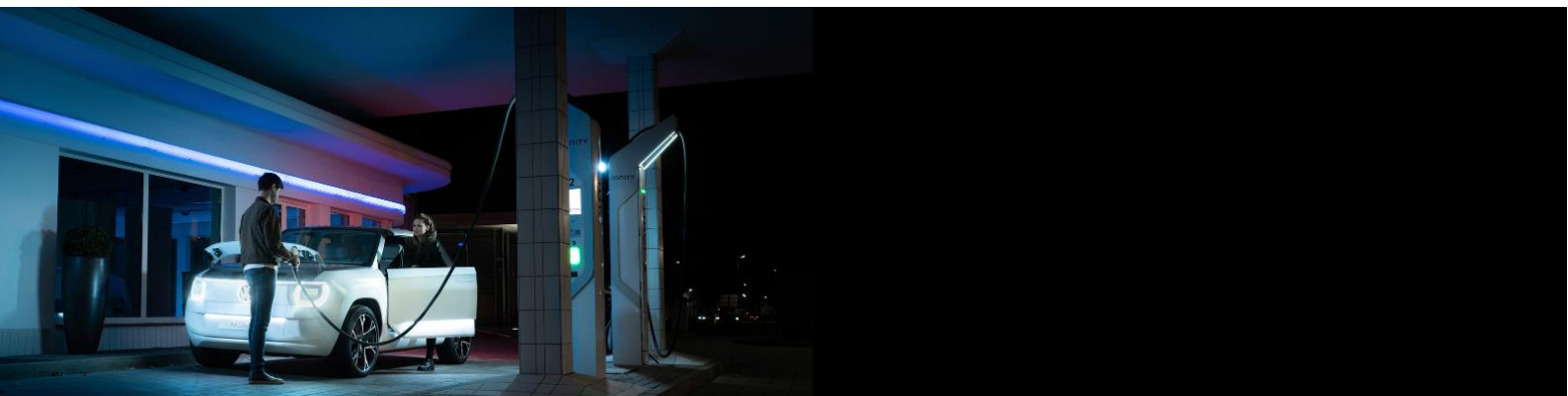
3. We Respect the ION-WAY and report any breaches

IONWAY is committed to maintaining the highest standards of ethical behavior and compliance with all applicable laws and regulations. We encourage all employees to report any misconduct or unethical behavior promptly and without fear of retaliation.

3.1. Whistleblowing

IONWAY encourages open discussions about responsible conduct and urges employees to report illegal or unethical workplace behavior, including violations of law, regulations, and ethical policies.

Reports can be made discreetly and anonymously through various channels. Employees should report concerns to their direct supervisor. Each supervisor is expected to be available to subordinates for that purpose. Depending on the question, concern or suggestion, each Employee has access to alternative channels of communication: local People & Organization Manager, the Legal & Compliance department, or, if applicable, the Corporate Internal Audit Department. Concerns about questionable accounting must be directed to, the head of the Corporate Internal Audit Department or, in case of the unavailability of the latter, to the Board of Management.



Reports can be made in any language and will be kept confidential. Discrimination or harassment against anyone making a report is prohibited, and those who feel retaliated against should contact their supervisor or the relevant organizational leader. Stakeholders can report concerns about IONWAY or its suppliers anonymously using the grievance contact form (<https://ionway.com/contact-form-integrity-line/>) with all grievances directed to IONWAY's Legal & Compliance Department for registration and follow-up via ***compliance@ionway.com***.

Failure to report instances of illegal or unethical conduct in the workplace, including violations of laws, regulations and ethical principles of which we are aware, will be considered a violation of the ION-WAY.

The ION-WAY

We encourage open discussions about responsible conduct, urging you to discreetly and anonymously report illegal or unethical behavior, including violations of laws and policies, through various channels, ensuring confidentiality and protection from retaliation, while stakeholders can report concerns using the Grievance contact form with all grievances managed by the Legal & Compliance Department.

How?

Reporting of Misconduct: Employees are encouraged to (discreetly and anonymously) report any illegal or unethical behavior, including violations of laws or company policies, through designated channels.



3.2. Non-compliance

Failure to comply with the ION-WAY can lead to considerable damage, not only for IONWAY but also for our Employees, Customers partners and stakeholders. The ION-WAY is therefore binding.

You must avoid acting, or encouraging others to act, in any way that is contrary to the ION-WAY even if such acts may appear to be in IONWAY's interest. This commitment to ethical behavior is paramount and non-negotiable.

If you are uncertain whether a particular activity (including that of an existing or prospective business partner) is legally or ethically acceptable, you should consult in advance with your immediate supervisor or with the Head of People & Organization or the Head of Compliance. Seeking guidance in these situations is crucial to maintaining the integrity of our operations and upholding our ethical standards.

Violations of the ION-WAY will not be tolerated and may, in accordance with relevant legislation, lead to internal disciplinary actions, dismissal, or even criminal prosecution. Each case is reviewed objectively, with full recognition of the circumstances, to ensure fairness and accountability.



Should improper practices or irregularities occur, necessary corrections and remedial action will be taken to prevent any recurrence. ***We set high standards, are performance driven, take initiative and aim for continuous improvement.*** This also means that we learn from every incident and strive to enhance our policies and procedures to safeguard against future issues.

4. Future revision

IONWAY retains the right to review the ION-WAY Code of Conduct as set to maximize its effectiveness.

In that case, IONWAY will provide all Employees with an updated version on the intranet.

