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Code of Conduct for Suppliers



Allego wants everyone to be able to charge their electric car wherever and whenever they want to, simply and affordably. Allego works on user-friendly and future-proof charging points, including the corresponding services and standards. This includes multiple different stakeholders. The wishes of EV-drivers and other end users form the basis of our charging solutions. Allego is the independent binding party whereby we work together with all market parties on a European, interoperable charging network, sharing all the knowledge and experience which is acquired.

We do all this in a responsible and sustainable manner. We expect our suppliers to likewise put a lot of work into socially responsible business practices. We use the Code of Conduct for Suppliers for that purpose.

General

The Allego Code of Conduct for Suppliers is based, amongst others, on the guidelines of the Organisation for Economic Cooperation and Development (OECD). It sets requirements on doing business ethically and fairly and sets out how we want to treat our people, how we want to improve our living environment, and how we want to work (together).

Suppliers must establish and maintain appropriate safeguards and processes to adhere to the contents of the Allego Code of Conduct for Suppliers. Supplier will undertake that its own supply chain meets the conditions and principles set forth in the Allego Code of Conduct for Suppliers and they actively review, monitor that they meet and align with the principles set forth in this the Allego Code of Conduct for Suppliers in relation to these safeguards, processes and supply chain amongst others.

If requested suppliers will provide Allego with (proof of) their relevant policies, descriptions of (business) processes and implementation. Allego may request to do a (regular) site visit or conduct a (regular) review of processes, systems, working environments and relevant elements of its own supply chain, to ensure that this Code of Conduct is adhered to. Supplier will commit to this in order to identify and prioritize any impacts human rights or labour rights or other breaches of this Code of Conduct in order to mitigate any impact or take the necessary measures or consequences.

The Allego Code of Conduct for Suppliers are applicable to suppliers and their employees, parent, subsidiary or affiliate entities, and subcontractors. Any supplier undertakes to communicate to their employees, parent, subsidiary and affiliated entities as well as any subcontractors, the Allego Code of Conduct for Suppliers applies and undertakes that these parties will also acknowledge and respect and abide to these conditions and principles. In addition, Suppliers should note that the Allego Code of Conduct for Suppliers applies to any supply agreement entered into with Allego and are binding on the supplier. Failure to comply with these conditions will result in a default towards Allego.

Rules, regulations and standards on these topics are live matters and change regularly and accordingly. Allego strives to adhere to the most recent standards and so should its Suppliers.

Human rights

Suppliers are to support and abide by any (internationally recognized) human rights as well as applicable local laws and regulations on labour, discrimination, equality and equal treatment as well as other relevant local laws, regulations and standards.

Labour

Everywhere in the world, employees should be able to work in decent, fair and safe conditions. Together with our suppliers we therefore respect the Universal Declaration of Human Rights and the international treaties on terms of employment and working conditions, as drawn up by the International Labour Organisation (ILO).

The following points are of particular importance and are to be abided by our suppliers.

• Anti-discrimination

All anti-discrimination provisions as defined in (supra) national laws and regulations are respected and complied with. There is no discrimination or any form of discriminatory employment practices on grounds of age, nationality, race, ethnic background, colour, religion, political opinion, national extraction, social origin, gender, sexual orientation or physical impairment or any grounds of discrimination or equality laws as would be applicable.

• Unions,

Employees shall have the freedom to organize and thus shall the right to join (labour) unions or equivalent associations. They have the right to participate in (collective) negotiations and bargaining aimed at reaching agreement about terms and conditions of employment. Employees shall not be discriminated on the basis of their right to organize, association with collective negotiation and bargaining or their membership of any association or union.

• Voluntary labour

It is recognised that labour is based on a voluntary agreement. Forced or compulsory labour is not used under any circumstances such as in the case that, in spite of human rights conventions, people are pressured to perform work. It is ensured that living wages are paid in appropriate tender and pursuant to the applicable labor laws.

• Child labour

Suppliers refrain from using child labour. All (supra) national laws and regulations which apply to child labour are respected to this aim. The ILO conventions 138 and 182 are of particular importance in this respect. They declare, among other things, that school-age children (i.e. before the age of the end of compulsory schooling in that specific country(ies) or jurisdiction)) are not included as employees, and that children (persons under the age of 18) are not deployed in dangerous work, forms of slavery and armed labour.

• Working conditions

Measures are taken to enhance and guarantee safe and appropriate working conditions. This concerns in any case working hours, and rest periods, safety measures and precautions, measures for specific risk groups and the handling of hazardous substances.

Environment

Caring for the living environment is part and parcel of sustainable business operations. Measures for protecting and improving the quality of the environment, public health and safety are important points for attention. Basic principles in caring for the living environment are:

• Life-cycle analysis

It is important to keep the footprint of products and services as low as possible. Negative impact on the living environment must be minimised. Valuable methods include LCA (life-cycle analysis), EIA (environmental impact assessment) and TCO (total cost of ownership). The consumption of raw materials and energy is analysed, as are emissions during the production and entire service life of the product. The supplier can demonstrate the life cycle of a product and thereby endeavour to use sustainable materials.

• Product composition

The raw materials used, the risks of hazardous substances, combinations of raw materials and the possibilities of reuse of raw materials and/or parts at the end of a product's service life are taken into consideration in the product composition. : Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

• Waste and recycling

Waste is avoided as much as possible and otherwise limited. The possibilities of recycling are investigated and put into practice whenever possible. One highly valued option is for the supplier to accept returned products at the end of their service life (whereby suppliers assume responsibility for the product and the raw materials).

• Information

Information about environmental, health and safety issues of activities is provided to employees and the local residents.

• Attitude and conduct

We believe in transparency in all that we do. We are Allego's business card when we visit on location, and we behave accordingly towards the customer. Work is performed and completed properly. Nuisance for the surroundings is limited as much as possible.

• Responsibility

Supplier understand the importance of social and environmental responsibility and has effective measures and policies in place in place to maximise sustainable business and the protection of the environment Suppliers need to abide to any laws and regulations and standards regarding social and environmental responsible business operations.

• Sustainable transport

Allego believes in sustainable transport. It is not just something for our customers, but also for our partners and our own employees. We want everyone to think consciously about sustainable transport and the environment. Whenever possible, we drive electric ourselves. We also hold our meetings online whenever possible.

• Cybersecurity & data protection

In general supplier will need to have measures and policies in place regarding the protection of data and effective measures on cybersecurity.

Anti-bribery policy

The below contains Allego's anti-bribery policy, applicable for any business conducted in or outside of the United Kingdom (UK) by a British company, a foreign company operating in the UK, a UK citizen, as well as persons holding residents permits for the UK.

Therefore, this policy is designed to help Allego employees, customers, affiliates, suppliers and other concerned parties to understand the relevant legislation applicable in the UK, namely the Bribery Act of 2010, relevant to bribery and corruption.

• Anti-bribery and corruption

In the UK, the US and other jurisdictions in which Allego operates, it is a criminal offence to offer, promise or provide – or request or accept, a bribe.

Allego operates on a strict no tolerance policy towards bribery in all its forms whether directly or through third parties.

This policy sets out our anti-bribery and corruption rules and what is expected of all parties representing or dealing with Allego.

• Understanding and recognizing bribery and corruption

Bribery and corruption can occur in many forms; therefore understanding and recognizing these forms when they may occur is a key step in guarding against them.

Bribery is when a person offers, promises or gives a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly.

Corruption is any form of illegal or dishonest behavior, especially by people in positions of power.

Wherever a party works in the world – even where bribery may be seen as the norm, it must be clear that neither Allego nor any involved parties will participate in or condone any form of bribery in our dealings with the public or private sectors.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a business decision.

Even political contributions, charitable donations and sponsorship arrangements can be used as a subterfuge for bribery.

• Penalties for engaging in bribery and corruption

Under the UK Bribery Act, companies and individuals found guilty of engaging in bribery or corruption can face punitive fines and even imprisonment.

In addition, the Act includes a specific criminal offence for when a company fails to prevent bribery committed on its behalf.

Therefore each party must take this responsibility seriously. For this reason Allego will not associate with parties whose standards match. Any party is expected to uphold relevant laws and legislation regarding bribery and corruption when dealing with Allego and is expected to have the necessary policies and safeguards in place. Such a party undertakes this towards Allego.

• Preventing bribery

In order to prevent bribery, involved parties must be aware of the forms it could be present in. Below is an outline of the most common forms of bribery and expected actions. This is merely a guideline.

i. Facilitation payments are usually small payments (or gifts) made to public officials in order to speed up or 'facilitate' actions the officials are already duty-bound to perform. The UK Bribery Act does not allow for any facilitation payments to be made. In case of (expected) extortion this needs to be raised with the relevant responsible compliance department and needs to follow the set internal policies as would be applicable.

ii. Kickbacks and reciprocal agreements or any other form of 'quid pro quo' are never acceptable. A party is expected not to participate in cartels, bid-rigging or any form of collusion. Allego will never accept improper payments to obtain new business, retain existing business, or secure any improper advantage and neither should an involved party.

iii. Corrupt third parties can include a range of people acting on behalf of a company such as agents, consultants, contractors or sub-contractors. Allego will only work with those who are committed to our standards and will undertake due diligence to ensure this. We will engage a third party only when there is a clear business rationale for doing so and with an appropriate contract. We will ensure all payments made to and by third parties are properly authorized and recorded.

iv. Excessive gifts and hospitality can be used to exert improper influence on decision makers. Allego will never offer or accept gifts or hospitality, if we feel it could influence a business decision or give the appearance of doing so.

Any party dealing with Allego is expected to ensure these standards are met and adhered to.

• **Disciplinary action**

Bribery is a criminal offence, which can lead to criminal penalties including imprisonment and fines for the party engaged in such activities and could have an impact on other parties such as Allego.

Therefore, any party involved has a duty to Allego and breaches of the provisions contained in this policy, will result in disciplinary action, up to and including dismissal (in case of employment and/or commission, engagement or similar) or a termination of the relationship.

• **Notice**

If a party has a concern or knows of or suspects a violation of this policy, this party must inform the relevant contact person at Allego immediately.

• **Acknowledgement**

The law requires Allego to ensure that all those to whom this policy applies, have read and understood the provisions contained within it. Therefore, Allego employees, contractors and any all suppliers of Allego to whom this policy is applicable will be required to sign a form of acknowledgement, whereby they acknowledge having read and understood this policy either as a separate document or contained within the contract with Allego.