

## # THE FASTNED CODE OF CONDUCT

Our mission is to give freedom to EV drivers

### **Employees' and human rights, harassment and discrimination**

Employees are our most important resource. We work as a team, promote inclusiveness and treat our colleagues with respect and fairness. We safeguard a culture of mutual trust and value differences of opinion as well as cultural diversity. We will recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed. We embrace clear standards on employees' and human rights, such as zero tolerance for harassment and discrimination, child and forced labour and human rights violations.

### **Health, safety and environment**

All our employees have the right to perform their duties in a safe and hygienic working environment. We are committed to provide a working environment that is safe and healthy.

>> Please refer to the full HSE manual, available at the Stations Team.

We continuously work to improve our impact on the environment. As documented in the mission, Fastned only sells electricity from solar and wind power. In addition, we are specifically focused on using sustainable materials.

>> [Please refer to our Statutory Notes on the website.](#)

### **Conflicts of interest**

We expect personal reliability and professionalism from all our employees at all levels and require them to act in the best interest of Fastned. We avoid situations in which a conflict, or the appearance of a conflict, could arise between the interest of Fastned and a possible personal benefit.

### **Fair competition**

We are committed to the principle of vigorous but fair competition. We adhere to laws and regulations which are designed to ensure effective competition. In particular, our business relations with customers and suppliers, as well as occasional contacts with competitors, require careful attention to competition rules wherever we do business.

### **Business partners**

We are committed to make a positive contribution to society and to establish and maintain fair and trusted business relations with our suppliers and other business partners. We seek to do business with parties that adhere to similar integrity standards and expect our suppliers to help us achieve our goals and integrity commitments.

## **Bribery, gifts & entertainment**

We believe that bribery, in all forms, must be eliminated. In order to protect reputations and adhere to the law, it is essential that we avoid bribery and improper advantages in any way or form.

We create goodwill and foster long-lasting business relations. We offer and accept gifts in an appropriate and transparent manner, which we preferably share with the whole team. Hosting and participating in events that contribute to the development and growth of infrastructure for electric cars is part of our business. We provide and accept entertainment and hospitality openly and unconditionally as a gesture of esteem and goodwill, while maintaining independence and safeguarding reputations.

## **Use of Fastned's resources**

We are all responsible for protecting our Fastned's assets, including our brand, innovations and intellectual property rights. We are also required to use resources in a careful and professional manner and for their intended business purpose only, unless other use is specifically permitted. We use Fastned's assets, such as, but not limited to, phones, laptops, vehicles and the office as they were our own. Meaning that we are careful and thoughtful about how we use them and where we leave them.

## **Confidential information**

We must use and protect confidential and secret information, including personal data, in a careful and professional manner as described in our employment agreement and by law.

## **Insider Trading**

We may come across information that is not yet publicly available, but which could be valuable to investors. No employee may disclose or use non-public information that a reasonable investor would consider important when deciding whether to trade.

[-> Please refer to the insider trading policy on the website](#)

## **Records keeping**

Accurate and complete data are essential to make informed business decisions. It is crucial therefore that we are able to provide reliable information to all our stakeholders. We all have a duty to ensure that our records, financial and non-financial, are accurate, complete, consistent and up-to-date.

## **Fraud**

We do not accept any behaviour that is intended to deceive or mislead others. All our employees are required to prevent fraud within our Company and to report any fraud or suspicion of fraud.

## Whistleblowers

We believe it is important that anyone can report, anonymously or not, concerns of any nature within the company. Each report is treated as highly confidential, and the utmost care is taken to resolve any concerns. We enforce a non-retaliation code. This policy is detailed in the Whistleblower Policy.

>> [Please refer to the Wistleblower Policy on the website](#)

## Privacy law

We are a company working with a lot of privacy sensitive information, therefore it is really important that you understand what sensitive information exactly is and how you should work with it. All information is available in our “Data at Fastned” document. We will test our employees knowledge during the Fastned awareness course.

>> Please refer to the HR Manual with regards to ICT, available at the security officer and/or the privacy officer.

## IT Rules of Use

In order to assure information security, confidentiality, integrity and availability, the following rules are set out:

### Remote work

Remote work is allowed. A VPN is available to those who need remote access to local files. VPN is provided on a case-by-case basis.

However, depending on the classification of the files in use, remote work may not be permitted. See the “Data at Fastned” document for more details.

- Files should either be stored on the file server or in Google Drive, and should never be stored on public or personal computers.
- Use of public wifi is restricted. Use your phone as a mobile hotspot to connect to the internet instead of using public wifi networks.

### Removable devices

We do not permit any removable devices - for example, USB sticks - to be used. Files may be transferred through preferred cloud providers such as Google Drive, or preferred messaging services such as Slack.

### Awareness training

Employees are expected to perform an annual course on information security to raise and keep an adequate level of awareness regarding information security and related topics.

### Password policy

Fastned follows the National Institute of Standards and Technology (NIST) SP 800-63 guidelines with regards to password policy and specifics. Passwords may never be written down, with the exception of encrypted storage in digital devices. Fastned prefers its employees to use a password manager.

## **Device responsibilities**

Employees are expected to keep their devices near them and within sight. Each employee is responsible for his or her device, including the assessment of what is near enough and within sight.

Each device should be properly secured. At receiving the device, the information security officer has implemented the necessary security options. You are expressly prohibited to tamper with these settings unless explicit agreement from the information security officer is provided.

Furthermore, employees are required to use their devices for their intended use and shy away from illegitimate use and nefarious practises. We believe that each employee can make the proper assessment of what is allowed and what is not.

>> Please refer to the HR Manual with regards to ICT, available at the IT Department.

## **Loss of Device / Theft**

In case of loss or theft of a device, immediately contact Thijs or Roland to disable and remotely wipe the device.

## **Sending documents**

Documents should be sent using either a renowned postal service (PostNL, Deutsche Post, DHL, UPS, etc.) or digitally using Email+File hosting service (Google Drive, Microsoft OneDrive, etc.)