

ESG Policy

Background

Spirii develops and provides high-quality, innovative software and hardware for EV-charging that allows companies, municipalities and housing associations to help transition the world towards sustainable driving and a more eco-friendly future.

Spirii has profound experience in the EV industry and offers clients an intelligent, cloud-based platform powered by market-leading technology designed to help reduce cost and energy consumption.

Spirii is headquartered in Copenhagen and operates across Europe.

Purpose and Scope

This Policy lays out Spirii's environmental, social and governance (ESG) principles and commitments, and it describes our approach to addressing ESG in our company. Where relevant, this is further described in process documentation and reporting.

Spirii management and employees are responsible for ensuring that the Policy is complied in their daily operations. Personnel is expected to adhere to the highest standard of integrity. In cases where there may be lack of clarity or guidance from the Policy, or in cases where the Policy is not adhered to, personnel shall report any issues of concern or discrepancy to the CEO.

This Policy applies to Spirii's management of all company activities. Business partners acting on behalf of Spirii are expected to comply with the policy. In cases where Spirii does not have full control of an activity, e.g. in the case of partnerships, Spirii shall use commercially reasonable efforts to encourage the implementation of this Policy or similar policy elements.

This Policy also serves to provide transparent communication to investors, employees, and other stakeholders about Spirii's approach to ESG. This Policy is publicly available.

ESG Principles

Spirii is dedicated to EV-charging and enabling sustainable driving. Globally, the transition to EVs is an important element in reducing greenhouse gas emissions and limiting global

warming. Through our sole focus on EV-charging Spirii enables reduction of greenhouse gas emissions from driving.

Spirii is committed to operating our activities in a sustainable manner, taking long-term environmental, social, and governance consequences into consideration. We adhere to relevant laws and regulations in all the markets in which we perform our activities. Additionally, we use reasonable commercial efforts, having regard for the size and context of our operations, to align our activities with established and recognized international guidelines and recommendations, in particular the UN Global Compact, OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

We consider ESG risks and impacts also for the supply chain. We take an active approach to identifying and addressing supply chain risks where we consider these to be material. And we take action to address negative externalities where we believe, we can have an impact.

We value transparency and provide relevant ESG reporting to investors and other stakeholders.

Supply chain and procurement

Spirii recognizes that the EV-charging supply chain is complex and entails potential ESG risks. This includes ESG factors such as carbon footprint of materials used, other environmental impacts, and human resource risks. Spirii believes it is important to monitor and manage ESG risks arising from the EV-charging supply chain.

During 2022, Spirii will implement ongoing ESG due diligence and ESG monitoring of key suppliers. The purpose of this is to ensure that relevant and material ESG risks and opportunities are identified and considered as an integrated part of the procurement decision. The ESG due diligence is conducted by Spirii in co-operation with external expertise where required.

If we identify suppliers with elevated ESG risks, we will implement mitigating measures, such as switching supplier where commercially viable, or working with the suppliers to reduce any significant negative ESG impact.

Environmental, Health and Safety (EHS) management

Spirii collects and evaluates information regarding environmental, health and safety impacts of Spirii's activities on a number of relevant themes:

Environmental:

- Greenhouse gas emissions
- Energy mix (share of renewable energy)

- Energy consumption
- Biodiversity
- Water emissions
- Hazardous waste

Social:

- Health and safety for employees, contractors and community
- Stakeholder relations, incl. local community, local employment and partnering, where relevant
- Working conditions and labour rights, incl. forced and child labour, inclusion and diversity, freedom of association, and employee engagement

Spirii assesses material EHS impacts and works to prevent serious EHS damages. This includes relevant EHS training to employees.

Spirii encourages partners to adopt technologies and procedures with the highest EHS standards.

Prohibited Sectors and Activities

Any part of the Spirii Group (Spirii) shall not invest, guarantee, or otherwise do partnership, or other support, directly or indirectly, to companies or other entities:

1. whose business activity consists of an illegal economic activity (i.e., any production, trade, or other activity, which is illegal under the laws or regulations applicable to Spirii or the relevant company or entity, including without limitation, human cloning for reproduction purposes) or which is legal but promotes violent conflicts;
1. which would result in violation of sanctions adopted by the UN or EU; or
2. which substantially focus on:
 - a. the financing of the production of and trade in weapons and ammunition of any kind;
 - b. casinos and equivalent enterprises;
 - c. the research, development or technical applications relating to electronic data programs or solutions, which
 1. aim specifically at:
 2. supporting any activity referred to under items (i) to (iii) above;
 3. pornography

4. or are intended to enable to illegally:
5. enter into electronic data networks; or
6. download electronic data.

In addition, when providing support to the financing of the research, development or technical applications relating to (i) human cloning for research or therapeutic purposes or (ii) genetically modified organisms (GMOs), we shall ensure the appropriate control of legal, regulatory, and ethical issues linked to such human cloning for research or therapeutic purposes and/or GMOs.

Further, Spirii shall not make any investment or activity to a company that, to the knowledge at the time of the partnership or cooperation, engages in the following activities:

1. Exploitation of disadvantaged social groups, e.g., using deceptive or exploitative subscription services or
2. Activities which are primarily of a speculative nature, including speculation related to tax matters, engages in activities which has a substantial negative impact on the local society or people.

Finally, Spirii will when making an operational partnership to their best effort ensure that the company:

1. Carefully considers the ethical ramifications of its activities;
2. Does not tolerate any form of discrimination based on race, gender, sexual orientation, age, disability, religion, political or other opinion, cultural background, ethnicity or other distinguishing characteristics in its organization.

Ongoing monitoring of partner companies

Spirii requires partners to have a position on ESG-issues, and we ensure that the partnership agreement includes reviews of ESG issues, including the prohibited sector and activities items mentioned above.

Anti-corruption

Spirii has zero tolerance for corruption. We expect that our employees and partners do not engage in any form of corrupt practices, including extortion, fraud, bribery, facilitation payment, or money laundry whether direct or indirect.

Governance and accountability

Spirii has established a governance structure to ensure oversight, training, and follow-up on the ESG Policy. The CEO of Spirii is overall responsible for the ESG policy. The COO of Spirii is responsible for ongoing follow-up on the ESG Policy and employee training.

Implementation of this Policy

The management of Spirii is responsible for maintaining and updating this Policy as required by changes to market practice, regulation, voluntary standards or as otherwise deemed necessary.

Spirii build trust in the organization and help people to feel safe

Spirii emphasize the value and purpose of whistleblowing for increasing transparency, reducing risks and losses, and preventing illegal activities sooner rather than later. We therefore have conducted a whistleblowing as a reinforcer of the organization's core values and code of conduct.

Please write to forum@spirii.com or send a letter to Spirii Aps, Bragesgade 8B, 2200 Copenhagen Att: Forum.

Spirii allow people to report anonymously, and you can remain so throughout the follow-up and investigation process.

CEO Tore Harritshøj



COO Torben Fog



CTO Michael Stoltenborg



CFO Mohan Parson



CSO Nordic Rasmus Larsen






CSO International Philip Graves



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