



Clever Code of Conduct

November 2023

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Purpose

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Purpose of the Code of Conduct

This document serves the purpose of establishing the defined requirements and ambitions that we expect our partners and suppliers to support and endorse.

At a fundamental level, we require all partners and suppliers to strictly adhere to applicable national and international laws, rules, and regulations within their respective countries.

A photograph of a white electric car charging at a station. The car is parked on a wooden deck next to a body of water. The charging station is green and black, with the text 'Frihed på farten' and 'Fuld af energi' on it. The sky is overcast with birds flying. The word 'Clever' is written in white at the bottom of the image.

Accelerating e-mobility through sustainable partnerships

Clever's purpose is to accelerate the mobility of the future by inspiring everyone to choose electric vehicles – to promote a sustainable society that runs on renewable energy. At Clever we recognise the vital role our suppliers play in our success and the realisation of our mission. Hence, we prioritise collaborating with suppliers who share our values and commitment to sustainability.

As a signatory of the UN Global Compact, Clever diligently upholds the principles of this initiative, along with the OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, and the ILO International Labour Standards. These commitments guide our business practices and reflect our dedication to responsible and ethical operations.

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Requirements and due diligence

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Conflicting requirements

If a conflict arises between applicable laws, regulations, and Clever's Code of Conduct, we expect our partners and suppliers to adhere to the highest standard.



Collaboration and due diligence: A partnership-based approach

All new partners and suppliers will be requested to formally endorse the Clever Code of Conduct by means of a signed agreement. Following this, an assessment will be conducted to evaluate their level of maturity in relation to the various sections outlined within the Code of Conduct document.

The assessment will serve as a basis for collaboratively establishing a development plan with the partner/supplier. This plan will identify the most crucial areas requiring improvement and together we will formulate specific initiatives aimed at addressing these areas. The progress made will be regularly evaluated at an agreed-upon frequency to ensure transparency and accountability.

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Collaboration and due diligence: A partnership-based approach

Clever acknowledges that companies may vary in their levels of maturity when it comes to their capacity to fully adhere to our Code of Conduct.

We also acknowledge that certain sections of the Code of Conduct may not be equally applicable or relevant to all of Clever's partners and suppliers. The potential irrelevance of specific aspects should be assessed on a case-by-case basis, considering the unique circumstances and context of each partner or supplier.

Clever will not, solely based on the Code of Conduct assessment, terminate contracts or collaborations with partners and suppliers. However, we do expect every partner and supplier to demonstrate a collaborative mindset and actively strive for improvement in all areas deemed necessary.

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Values

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Human rights

Suppliers must support and respect the protection of internationally proclaimed human rights, including the right to life, liberty, and security of persons, and ensure they are not complicit in human rights abuses.

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Labour rights and conditions

Suppliers must respect the rights of workers, including upholding the freedom of association and the effective recognition of the right to collective bargaining. Furthermore, suppliers must eliminate all forms of forced labour, child labour, and discrimination in respect of employment and occupation. In addition, suppliers must pay fair wages and benefits to their employees.



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Health and safety

Suppliers must ensure healthy and safe working conditions for their employees, contractors, and visitors in compliance with applicable laws and regulations.



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Diversity and inclusion

Suppliers must promote diversity and inclusion and ensure equal opportunities for all employees, regardless of gender, ethnicity, age, religion, or any other characteristic protected by law.



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Environment

Suppliers must support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly technologies. In addition, suppliers must comply with all applicable environmental laws and regulations and adopt practices to reduce their environmental impact and carbon footprint. Such practices include:

- i. Striving to reduce greenhouse gas emissions by prioritising the use of renewable energy in production and operations.
- ii. Implementing circular economy practices, including recycling and reusing materials, minimising waste, and promoting upcycling of materials.
- iii. Promoting biodiversity and conservation efforts.



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Anti-corruption

Suppliers must work against corruption in all its forms, including extortion and bribery. Suppliers must conduct their business with integrity and a zero-tolerance policy for unethical behaviour.



Ethical conduct and transparency

Suppliers must maintain the highest standards of ethical conduct in their business practices and support the principles outlined in the UN Global Compact, OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and ILO International Labour Standards.

Furthermore, suppliers must promptly notify Clever in the event they become aware of any actual or potential breaches of applicable laws, regulations, the aforementioned initiatives, or this Code of Conduct. This obligation extends to situations occurring within the supplier's organisation as well as involving other counterparts such as customers or suppliers.

A photograph of a person walking on a sidewalk in front of a building with red horizontal slats. There are two green charging stations on the sidewalk. The scene is lit with warm, golden light, suggesting late afternoon or early morning. The person is wearing a white top and dark shorts, and is walking away from the camera.

Supply chain responsibility

Suppliers are responsible for ensuring that their own suppliers also adhere to the same high standards of conduct and that the products and services provided are free from human rights abuses. Additionally, suppliers should actively work towards promoting responsible sourcing of minerals and materials, as well as enhancing traceability within the supply chain.

Clever expects suppliers to be transparent and willing to share policies and descriptions regarding their supply chain management upon request.

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Community engagement

Suppliers must engage with their local communities and contribute to their social and economic development.



ESG data

Suppliers must work actively towards providing accurate and transparent environmental, social, and governance (ESG) data to Clever, enabling us to measure and improve our sustainability performance. This data might include the following:

- ❖ Life Cycle Assessments (LCAs) of products, including Product Carbon Footprints.
- ❖ Reporting of Scope 1, 2, and 3 greenhouse gas (GHG) emissions.
- ❖ Documentation of the share of renewable energy consumption.
- ❖ Disclosure of the share of recycled materials utilised.

We expect our suppliers to demonstrate their commitment to these principles by agreeing to this Code of Conduct, complying with all relevant legal requirements, and adopting appropriate management systems and procedures to ensure continuous improvement in their operations.



Clever's role

At Clever, we strongly believe in the power of dialogue and collaboration across the entire value chain to drive positive impact. While we have expectations for our suppliers to regularly review and enhance their sustainability practices, we recognise that each supplier's sustainability journey is complex and presents unique challenges.

Clever is committed to engaging in ongoing dialogue, collaboration, and sharing knowledge with our suppliers. We aim to leverage the collective intelligence and efforts of our value chain to promote sustainability.

However, Clever also reserves the right to evaluate the performance of our suppliers against the established standards. In cases of non-compliance, we may take appropriate measures, which can include conducting audits, assessments, and, if necessary, terminating the business relationship. Such actions are taken to ensure adherence to our shared sustainability goals and uphold the highest standards of ethical conduct.

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