Anti-Discrimination Directive

Anti-Discrimination Directive of the Q ENERGY Solutions SE Group[1*]

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[1*]As Holding Company Q Energy Solutions SE is the issuer of the following Anti-Discrimination Policy that shall be applicable for all Group companies within the Q Energy Solutions SE Group (following Q ENERGY), both directly and indirectly controlled by Q Energy Solutions SE.

1 ABOUT THIS POLICY

a. This Anti-Discrimination Directive ("**Directive**") of Q Energy Solutions SE, Q ENERGY Europe GmbH and Q Energy France SAS (together "**Q ENERGY**") shall establish the commitment to a workplace free from discrimination and harassment.

b. This Directive supports our intention to have an open and inclusive work environment within Q ENERGY, promoting equality, diversity, inclusivity and fairness whilst preventing discrimination and harassment.

2 SCOPE

a. This Directive shall apply to all employees, contractors, and third parties acting on behalf of Q ENERGY, regardless of their location of work or position.

b. The management (especially due to its role model function) and the employees of Q ENERGY are obliged to act with integrity, fulfilling this Directive, as well as the Code of Conduct of Q ENERGY and all other applicable laws and regulations regarding conduct and anti-discrimination.

3 PROHIBITED CONDUCT

Q ENERGY prohibits any form of:

- direct or indirect discrimination;
- harassment, including sexual harassment; or
- victimization.

4 DEFINITIONS

1. DISCRIMINATION

a. Discrimination is unjustly or unfairly denying equal treatment or opportunity to individuals or groups with respect to the terms, conditions, or privileges of employment based on any of the characteristics listed below.

b. This unfair denial of equal treatment or opportunity can include but is not limited to hiring, firing, promoting, disciplining, scheduling, training, or deciding how to compensate an individual or group.

c. Discrimination arises where unfair treatment is predicated on any of the following actual or perceived characteristics:

- ethnic or national or social origin or skin color;
- nationality, immigration status, citizenship, or ancestry;
- sex, age, gender identity/status/expression or sexual orientation;
- marital and family status, pregnancy and maternity;
- economical and social status;
- physical/mental ability condition/characteristics, limitations or health status;
- religion or belief;
- political or other opinion;
- any other protected characteristic under applicable law.

This list is not exhaustive and may be supplemented by local law.

2. DIRECT DISCRIMINATION

Direct discrimination occurs when one person within their business or social interaction is treated or has been treated less favorably than another person would have been treated in a comparable situation based on any of the characteristics mentioned in 4.1.c.

3. INDIRECT DISCRIMINATION

Indirect discrimination occurs when an apparently neutral provision, criterion or practice would put a person with characteristics as mentioned under 4.1.c. in disadvantage compared with another person unless:

a. that provision, criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary, or

b. Q ENERGY is obliged, under national legislation, to take appropriate measures to eliminate disadvantages entailed by such provision, criterion or practice, e.g. in regard to a quota of hiring people with disabilities.

4. HARASSMENT

a. Harassment is unwelcome and degrading, abusive, intimidating, or hostile verbal or physical conduct which unreasonably affects or interferes with an individual's ability to do their work or creates a degrading, abusive, intimidating, or hostile work environment.

b. Harassment can be based on any of the characteristics listed under 4.1.c. The list is not exhaustive and may be supplemented by local law.

c. Harassment may include:

- physical touching, violence or threats of violence;
- offensive or derogatory comments;
- nicknames, slurs, jokes, pranks, stereotypes, insults;
- creating, sharing or displaying derogatory or otherwise inappropriate written materials, images, electronic messages, videos, or music;
- comments or behavior intended to threaten or intimidate; and
- other nonverbal behavior, including intimidation, stalking, or inappropriate staring, that threatens or reasonably could be perceived to threaten another.

5. SEXUAL HARASSMENT

Sexual Harassment is unwelcome conduct of a sexual nature which is degrading, abusive, intimidating, or hostile. Like Harassment, Sexual Harassment can be a single act, incident, or statement, as well as a pattern or series of acts, incidents, or statements. Sexual Harassment may include:

- unwelcome sexual advances or requests for sexual favors, including any with an implicit expectation of reciprocation as a condition of employment, promotion, or advancement;
- creating, sharing, or displaying inappropriate written materials, images, electronic messages, videos, or music that reasonably could be interpreted to be sexual or obscene in nature;

- unwanted comments about personal or physical characteristics of any individual that reasonably could be interpreted to be sexual or obscene in nature; and

- other non-verbal behavior of a sexual or obscene nature, including unwelcome bodily contact, leering or inappropriate staring.

6. VICTIMIZATION

Victimization is treating someone less favorably because they have complained about discrimination or harassment or have supported someone else who has complained about discrimination or harassment.

5 PREVENTION AND AWARENESS

a. Q ENERGY is committed to adopt all the necessary measures to prevent any discrimination in the workplace, job applications, business relationships, etc., as well as avoiding the use of discriminatory language, harassment, and actions that create a hostile work environment.

b. Q ENERGY will promote norms of equality, fairness, and inclusiveness as well as nurturing a positive work culture and ensuring equal opportunities for all employees.

c. Q ENERGY is committed to provide regular anti-discrimination and harassment training to all employees, including managers and supervisors.

d. Q ENERGY is committed to communicate its Anti-Discrimination Directive through various channels, through SharePoint internally and through the company website externally.

6 INCLUSIVE AND NON-DISCRIMINATORY LANGUAGE

All communication, both internal and external, shall be conducted in an inclusive and non-discriminatory manner. This includes but is not limited to written communication, verbal communication, and electronic communication.

USE OF INCLUSIVE LANGUAGE

a. Gender-Neutral Language: Q ENERGY shall strive to use gender-neutral language wherever possible. This includes the use of gender-neutral job titles, avoiding gender-specific pronouns when referring to individuals in a general sense, and using inclusive language that avoids stereotypes.

b. Respect for Pronouns: Q ENERGY will respect the preferred pronouns of all individuals. Employees should use the pronouns that their colleagues have indicated they prefer. If unsure about an individual's pronouns, it is appropriate to ask respectfully.

c. Avoidance of Stereotypes: The Company prohibits the use of language that reinforces stereotypes based on any protected ground.

7 REPORTING AND INVESTIGATION PROCEDURE

a. Employees who become aware of potential violations of this Directive should promptly report them to their Manager, Compliance Officer/Harassment Officer, Human Resources representative, (where applicable) Works Council or report the incident via Q ENERGY whistleblower reporting channel (Hintbox).

b. All complaints will be treated promptly and confidentially, and the persons involved will be protected from retaliation.

c. In the event of a discriminatory action or harassment, the following measures shall be taken:[2]

   i. The case shall start to be investigated within 72h from the reporting.

   ii. The investigation shall be led by the respective Human Resource Department and may include Q ENERGY'S relevant Compliance Department. The established inner-company reporting mechanism for inappropriate behavior shall give guidance for the procedure.

   iii. If necessary, an external person can be deployed for mediation and/or investigation purposes. The fees in this case shall be assumed by the employer.

   iv. After the investigation and the decision to take disciplinary measures - following the inner-company reporting mechanism for inappropriate behavior, the Works Council shall be informed where applicable as per local statutory regulations.

8 REMIDIAL ACTIONS

If discrimination or harassment is found to have occurred, Q ENERGY will take appropriate disciplinary action against the offender and provide support to the victim.

[2] Please see the internal attachment to this Directive and article published at SharePoint regarding the reporting mechanism for inappropriate behavior procedure: Q ENERGY's Commitment to a Safe and Respectful Work Environment (SharePoint.com).

9 MONITORING AND EVALUATION

Q ENERGY will regularly monitor its anti-discrimination practices and collect data in line with GDPR regulations (such as anonymous employee feedback) to assess the effectiveness of this Directive.

10 ACCOUNTABILITY

All employees, managers, and executives are responsible for complying with this Directive. Violations of this Directive may result in disciplinary action, up to and including termination of employment.

Team lead, head of department, head of office, management have an added duty to create, uphold, and promote a safe, respectful, and inclusive work environment. They will be held accountable if they engage in, overlook, or condone any conduct that violates this Directive.

11 AMENDMENT

This Directive may be amended from time to time to reflect changes in laws, regulations, or company practices.

12 MISCELLANEOUS

In the event that an anti-discrimination regulation is in force in countries where Q ENERGY is present and the latter goes beyond the current Directive, this regulation will remain fully effective. In case of contradiction, the national regulation shall prevail.

13 EFFECTIVENESS OF THE DIRECTIVE

The Directive is effective since 27.06.2025.