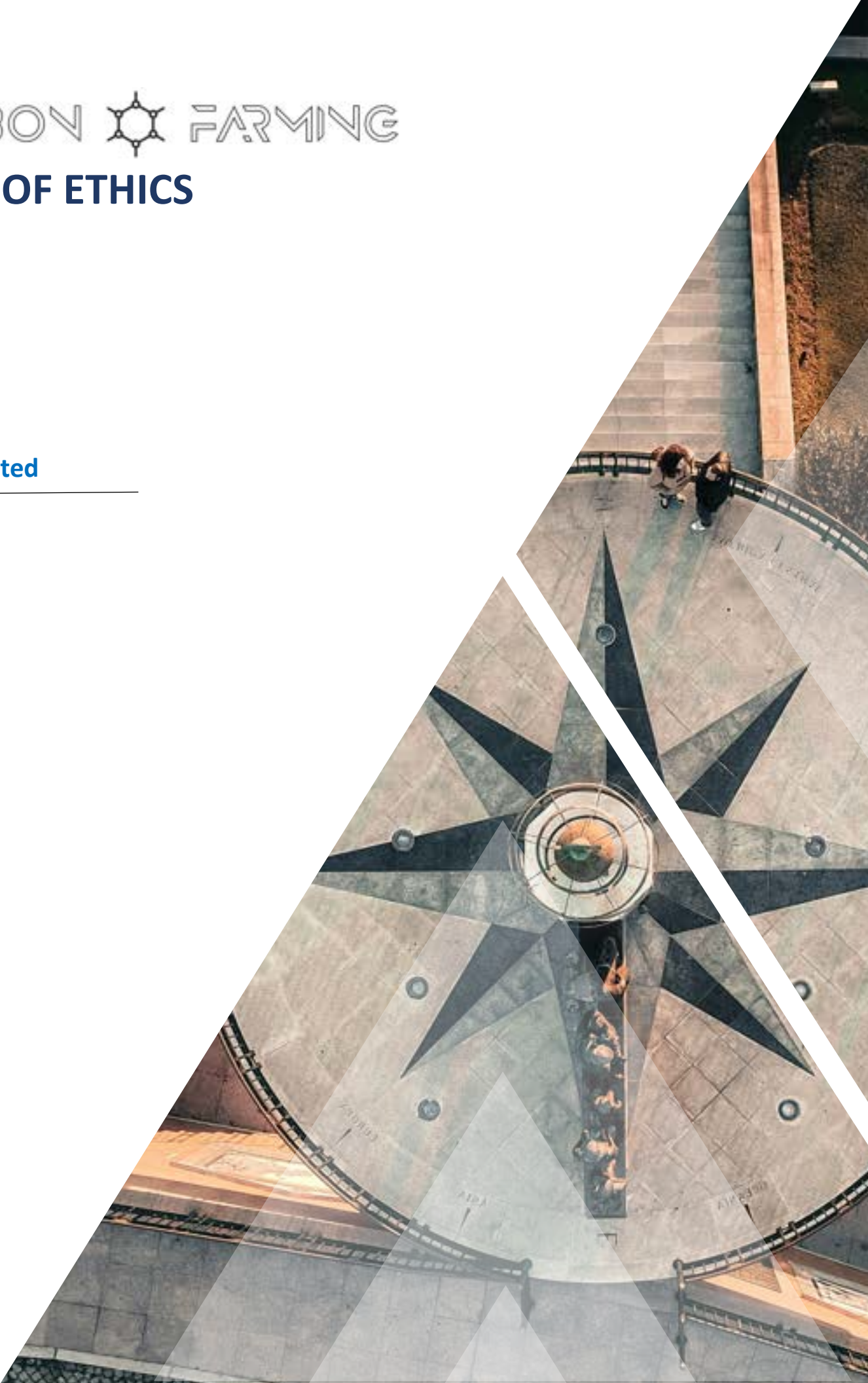


CARBON FARMING

CODE OF ETHICS

Last Updated

May 2025



Introductory Message

At **Carbon Farming Germany GmbH**, we may be a small and lean team today, but our mission is far-reaching. As a fuel supplier with ambitious growth goals, we recognize the responsibility that comes with our role. We must hold ourselves, our business partners, customers, and all other stakeholders accountable to the highest ethical standards. Our values are anchored in integrity, transparency, and a commitment to sustainability, and we strive to embody these values in everything we do.

Our **Code of Ethics** outlines the principles that guide our daily operations and decisions. It applies to every team member and we expect the same from every stakeholder, ensuring that we foster trust, build long-term partnerships, and contribute positively to society and our environment.

Lennart L. Feldmann
Co-Founder & COO



Who Must Follow This Code

This **Code of Ethics** applies to everyone involved in Carbon Farming Germany GmbH's business operations.

Employees: All employees are required to follow this code, ensuring their actions reflect our ethical values and commitment to integrity.

Non-Controlled Entities: We expect affiliated entities not directly controlled by us to align with our ethical standards in their operations and interactions with us.

Third Parties: Contractors and business partners must uphold the principles outlined in this code when conducting business on our behalf.

Suppliers of Goods and Services: Suppliers are expected to adhere to these ethical guidelines, ensuring that their goods and services meet our standards of integrity and fairness.



Ethical Codes

Anti-Money Laundering (AML)

We are committed to complying with all national and international laws regarding the prevention of money laundering. We will not tolerate any activities that may be construed as an attempt to legitimize proceeds from illegal activities through our business.

- All transactions and customer relationships must be monitored to ensure compliance.
- Due diligence will be conducted on all clients, suppliers, and partners.
- Any suspicious activity must be promptly reported to the relevant authorities.

Counter-Terrorism Financing (CTF)

We are dedicated to preventing the use of our services and resources to fund or support terrorist activities. Carbon Farming Germany GmbH will take all necessary measures to ensure that its operations are not used for any illegal or unethical purposes, especially in relation to terrorism.

- Thorough checks will be made on all financial transactions, customers, and partners to ensure no connection to terrorist organizations.
- We will maintain vigilance and comply with relevant laws and reporting requirements to prevent terrorist financing.

Sanctions

We strictly comply with all applicable international, European, and national sanctions laws and regulations. We do not engage in business with individuals, entities, or countries that are subject to sanctions or trade restrictions. All employees, partners, and suppliers are expected to ensure that their activities do not violate sanctions rules and must perform due diligence where required. Any suspected breach of sanctions must be reported immediately, as non-compliance can result in serious legal and reputational consequences.

Commitment to Sustainability and the Environment

As a company **rooted in decarbonizing transportation**, we place sustainability and environmental stewardship at the core of our operations. We are dedicated to reducing carbon footprints, promoting renewable energy solutions, and contributing to a cleaner planet.

- All company activities will strive for the highest environmental standards, ensuring minimal ecological impact.
- We are committed to continuously improving our sustainability practices and supporting environmental regeneration initiatives.



- Team members are encouraged to prioritize green solutions in all aspects of our work, from daily operations to strategic decisions.
- We are committed to upholding the standards by ISCC-EU.

Anti-Bribery and Corruption (ABAC)

We have zero tolerance for bribery or corruption in any form. We believe in conducting business transparently and ethically, while always avoiding conflicts of interest.

- Employees, partners, or any associated individuals are prohibited from offering, soliciting, or accepting bribes of any kind.
- Any suspicious or corrupt behaviour must be reported immediately.

Fraud Prevention

We maintain a zero-tolerance policy toward fraud in any form. Fraud—including theft, deception, embezzlement, forgery, or the misuse of company assets—undermines trust and puts our integrity at risk. All employees, contractors, and partners are expected to act honestly and transparently in all business dealings. Any suspected fraudulent activity must be reported immediately and will be investigated thoroughly. Individuals found to be involved in fraud will face disciplinary action and, where appropriate, legal consequences

Gifts and Hospitality

As a general rule, we at Carbon Farming Germany GmbH do not accept gifts or hospitality that could influence business decisions. Modest, token gifts may be accepted in rare cases, but anything of significant value must be declined or reported to management. We strive to ensure that all business dealings are conducted transparently and ethically.

Data Protection and Privacy

We respect and protect the privacy of our customers, partners, and employees. Compliance with data protection laws, including GDPR, is a non-negotiable standard.

- We ensure that all personal data is handled responsibly, securely, and only used for its intended purpose.
- Regular training will be provided to ensure all team members are aware of their responsibilities in safeguarding data.
- Any data breaches will be handled promptly and transparently in accordance with applicable regulations.



Equal Opportunity + Prevention of Workplace Harassment and Discrimination

We are committed to maintaining a workplace environment that fosters respect, inclusivity, safety, and fairness. Any form of harassment, discrimination, or unfair treatment is strictly prohibited.

- All employees, regardless of age, race, sex, background or any other demographic, are entitled to a safe, respectful, and harassment-free workplace.
- We value diversity and promote an inclusive culture where everyone has **equal opportunities**.
- Violations of this policy will be taken seriously and acted upon swiftly.

Human Rights

Workplace: We provide a safe, respectful, and inclusive working environment, free from discrimination, harassment, or exploitation, and ensure fair treatment for all employees. We strictly prohibit all forms of modern slavery, forced labour, and human trafficking in our operations and supply chains.

Local Communities: We respect the human rights of the communities we operate in, ensuring our business practices positively contribute to their well-being and do not infringe on their rights or livelihoods.

Business Partners: We do not conduct business with individuals, organizations, or suppliers known to be involved in human rights abuses, including modern slavery, forced labour, or other exploitative practices.

Safety and Well-Being

Safety and well-being are top priorities. We are committed to providing a safe, healthy workplace for all employees, partners, contractors, and visitors.

- **Safe Workplace:** We aim to maintain a hazard-free environment, where all employees are responsible for following safety protocols and reporting unsafe conditions.
- **Compliance:** We strictly adhere to local, national, and international health and safety regulations, ensuring our operations meet industry standards. We also adhere to safety standards and protocols of our partners when applicable (e.g. on-site visits etc.).
- **Accident Prevention:** Employees are encouraged to report hazards early to prevent accidents, and we will take corrective action immediately.
- **Health and Well-being:** We promote work-life balance and provide resources to support mental and physical well-being.
- **Incident Reporting:** All incidents must be reported immediately, and we will investigate thoroughly to prevent future occurrences.

By prioritizing safety, we ensure a healthy, productive work environment for everyone.



Insider Trading, Confidentiality, and Anti-Competitive Conduct Avoidance

We ensure that confidential company information, particularly regarding potential business developments, is never misused.

- Employees are prohibited from using confidential information for personal gain or sharing it with unauthorized parties.
- Insider trading—using non-public information for trading or investment purposes—is strictly prohibited.
- All sensitive information must be treated with the highest level of discretion and protection.
- We adhere to all applicable antitrust laws and promote an open, competitive market where success is based on innovation, quality, and ethical business practices.

Conflict of Interest

Our employees and stakeholders must avoid any activities or relationships that could create a conflict between personal interests and the best interests of the company. Any potential conflicts must be disclosed to management immediately to ensure transparency and ethical decision-making.

Whistleblower Protection

We encourage transparency and the reporting of unethical or illegal behaviour. Any individual who reports such behaviour in good faith will be protected from retaliation.

- We will provide safe channels for employees and stakeholders to report suspicious or unethical activities.
- All reports will be taken seriously and investigated thoroughly, with confidentiality maintained.
- Whistleblowers will be safeguarded from retaliation or adverse consequences for their actions.

Political Activities

Carbon Farming Germany GmbH remains politically neutral and does not engage in or endorse political activities. Employees are free to participate in personal political activities, but these should be kept separate from company operations, and company resources must not be used for political purposes.

Protection of Assets and Intellectual Property (IP)

At Carbon Farming Germany GmbH, we are committed to safeguarding our own assets and intellectual property, as well as those from our partners, customers, service providers and other stakeholders. Employees must responsibly use resources and protect confidential information, including trade secrets and innovations. Any misuse, unauthorized disclosure, or theft of assets or IP will be taken seriously and addressed promptly.



Compliance and Accountability

We expect all employees and stakeholders to adhere to this **Codes of Ethics**.

- Regular training will be provided to ensure understanding and compliance with these ethical standards.
- Internal audits and reviews will be conducted to ensure continued adherence to this code.
- We are committed to continuous improvement and will revise this code as needed to stay aligned with industry best practices and evolving regulations.

Expectations from the Reader

As a stakeholder of Carbon Farming Germany GmbH, we encourage you to critically evaluate your business decisions against this Code of Ethics. Ask yourself if any decision you make may violate one or more of these ethical guidelines; if so, you must reject that decision.

If you are ever uncertain about the ethical implications of a choice, please reach out to us at info@carbonfarming.earth for guidance.

Your commitment to ethical practices is essential to our shared success.

