



COMPLIANCE REPORT 2022

Compliance is of central importance for the executive board and supervisory board of VARTA AG. Compliance refers to measures that ensure the company, its management bodies, and its employees act in accordance with the law.

As an internationally operating company, VARTA AG is subject to a multitude of laws, regulations, and directives. To comply with these norms and internal guidelines, the company has established codes of conduct that set standards for ethical and legal behavior. VARTA AG is committed to upholding the highest ethical and legal standards with regards to its shareholders, employees, business partners, competitors, and society at large. The VARTA AG Group's Code of Conduct and whistleblower system are available at <https://www.varta-ag.com/en/about-varta/compliance>. The established code of conduct underscores the corporate culture and values of VARTA AG. The company conducts its business in accordance with legal and ethical standards and in compliance with all applicable laws and regulations.

The management serves as a role model for all employees and continuously supports them in adhering to applicable regulations. The code of conduct has been communicated to the employees, and they have been made aware of the consequences of non-compliance. VARTA AG has appointed a Chief Compliance Officer who oversees the international implementation of the compliance program and works on the continuous updating and adaptation of the compliance system.

In the fiscal year 2022, VARTA AG updated its code of conduct and developed an anti-corruption policy to ensure that corruption is prevented at all levels of the company. The policy contains clear provisions for the identification, prevention, and combating of corruption. Both documents will be published in 2023 and apply to all employees of the VARTA AG Group.

The company-wide data protection policy has been updated, and training on data protection has been conducted.

In the fiscal year 2022, the compliance reporting structure did not result in any indications of compliance violations. All suspected cases of compliance violations are recorded and reviewed according to uniform criteria within VARTA AG.



VARTA

Overall, in the fiscal year 2022, VARTA AG intensified its efforts towards compliance and will continue to maintain its efforts to ensure a high level of integrity and ethics in all business activities in the future.