



COMPLIANCE REPORT 2023

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 a code 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 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. The Chief Compliance Officer operates the international implementation of the compliance program and works on continuous updating and adaptation. In financial year 2023, VARTA AG continued its efforts to introduce a holistic compliance management system.

Compliance violations within VARTA AG can be reported via an anonymous whistleblower system. Within VARTA AG. Suspected cases are recorded and reviewed according to standardized criteria. The compliance reporting structure did not lead to any indications of a compliance violation in fiscal year 2023.

Overall, in the fiscal year 2023, 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. The VARTA AG Group's Code of Conduct and whistleblower system are available at <https://www.varta-ag.com/en/about-varta/compliance>.