



DATAGROUP

Supplier code of conduct



Foreword

DATAGROUP BIT Hamburg GmbH and DATAGROUP BIT Düsseldorf GmbH (hereinafter referred to as "DATAGROUP") are committed to high ethical, sozial and ecological standards in accordance with the DATAGROUP code of conduct and the present code of conduct for suppliers ("Code").

All suppliers of DATAGROUP and their own suppliers (each a „supplier“) must share this commitment.

Suppliers are expected to comply with all applicable laws, including applicable anti-corruption laws, around the world; promote diversity and good corporate citizenship; meet and exceed environment, health and safety standards; respect human rights; support a sustainable and transparent supply chain, including responsible mineral sourcing practices; and utilize management systems and processes necessary to enable compliance with this Code.

Failure by Supplier to comply with this Code may jeopardize Supplier's business relationship with DATAGROUP, up to and including termination.

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Labor and Human Rights

- Supplier must treat its employees, partners and workers with dignity and respect.
- Supplier must not engage in human trafficking, slavery, child labor or any other form of involuntary labor.
- Supplier must not allow or engage in unlawful discrimination or harassment in the workplace. DATAGROUP does not tolerate conduct that might harass, disrupt or interfere with another person's ability to work.
- Supplier's employees, partners and workers must not possess, use, distribute or sell drugs on DATAGROUP property or perform their work under the influence of alcohol or drugs.

Environment, Health and Safety

- Supplier must conduct operations with an objective of reducing waste, preventing pollution, promoting recycling and conserving resources.
- Supplier must provide safe and healthy working conditions to all employees, partners and workers, including emergency preparedness, industrial hygiene and machine safeguarding, among other things.
- Supplier must comply with all applicable environment, health and safety laws.

Conflict Minerals

- Conflict minerals are defined as coltan (tantalum ore), cassiterite (tin ore), gold, wolframite (tungsten ore) or their derivatives (tantalum, tin, tungsten and gold).
- DATAGROUP objective is to eliminate conflict minerals from its supply chain that directly or indirectly finance, or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. DATAGROUP expects Supplier to share this objective.
- DATAGROUP conducts due diligence on its supply chain to enhance transparency and identify the country and smelter or refiner of origin of the conflict minerals that may be used in its products. Supplier must participate in DATAGROUP due diligence processes and provide complete and accurate information when requested. Supplier must perform similar due diligence on its own supply chain.

Conflict of Interests

- A conflict of interest arises when personal interests or activities conflict with, or appear to conflict with, the best interests of DATAGROUP or the Supplier as organizations.
- Supplier must disclose to DATAGROUP any apparent or actual conflicts of interest regarding its relationship with DATAGROUP. If DATAGROUP management approves an apparent or actual conflict, the approval decision must be documented.

Gifts and Entertainment

- On an infrequent basis, DATAGROUP employees may accept token gifts, modest entertainment or other business courtesies, but only if there is a legitimate business purpose.
- The following situations do not have a legitimate business purpose and are expressly prohibited:
 - Giving a gift, entertainment or preferred treatment with the intention of trying to influence the decision-making objectivity of a DATAGROUP employee, partner or worker.
 - Offering a gift, entertainment or preferred treatment while involved in a current purchasing or contracting decision process with DATAGROUP (e.g., RFI, RFQ, RFP, RFS).
 - A gift in the form of cash, including gift cards or certificates.
 - Offering extravagant or lavish recreational outings, travel or lodging.
- DATAGROUP employees are not permitted to solicit gifts, entertainment or other gratuities from Supplier.
- Supplier must not offer an opportunity to purchase products, services or a financial interest to any DATAGROUP employee under terms not available to all DATAGROUP employees.
- Suppliers may not provide gifts, entertainment or travel on behalf of DATAGROUP in connection with obtaining or retaining business for DATAGROUP.

Data Privacy

- Supplier must comply with applicable data privacy laws and regulations when processing personal information of anyone they do business with, including suppliers, customers, consumers and employees.
- In particular, supplier must only process the minimum amount of personal data necessary to perform its obligations to DATAGROUP and only for the purposes set out in its agreement with DATAGROUP. Supplier must keep personal data confidential and secure at all times.

Accuracy of Business Records

- Supplier is required to maintain accurate books and records that reflect actual and legitimate transactions and payments. The creation of falsified, inaccurate, incomplete or misleading documents is strictly prohibited.
- All financial books and records must conform to generally accepted accounting principles.
- Records must be legible and transparent.

Competition, IP and Confidential Information

- Supplier must comply with all applicable laws regarding fair competition and antitrust.
- Exchanges of confidential information must be pursuant to a written and executed confidentiality agreement between DATAGROUP and Supplier. Any exchange of confidential information must be for the limited purpose of fulfilling contractual performance requirements.
- Supplier must not share or disclose DATAGROUP' intellectual property, confidential information or any other proprietary information that Supplier acquires with any third party (including information developed by Supplier and information relating to products, customers, pricing, costs, know-how, strategies, programs, processes and practices).
- Supplier must not disclose material, non-public information or trade in DATAGROUP, and its affiliated companies' securities based on material, non-public information.

Trade, Import and Export

- Supplier must comply with the letter and spirit of all applicable import, export, customs, sanctions, embargoes, boycott, and other trade compliance laws.

Management Systems

- Supplier must maintain management system and processes necessary to enable compliance with applicable laws and all elements of this Code, including training, monitoring, record keeping and reporting.

Contact at DATAGROUP

- The Supplier can contact its DATAGROUP sourcing manager in the first step in case of concerns and uncertainties.
- Notifications can be submitted via DATAGROUP's group-wide reporting system. This allows both personal and anonymous reporting of violations.
- It can be accessed via the following link: [DATAGROUP Hinweisgebersystem](#)