

Supplier Code of Conduct

DATAGROUP is characterized by its sustainable and responsible growth and corporate governance that is based on a bedrock of values. We have expressly committed ourselves to the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, the United Nations, and the Conventions of the International Labour Organization (ILO). We expect the same conduct from all our suppliers.

We are continuously optimizing our corporate actions as well as our products and services in the interest of sustainability. In accordance with a holistic approach, our suppliers will also have their part to play.

We therefore expect our suppliers (including their entities, employees, representatives, sub-contractors and contract partners) to comply with all applicable domestic and foreign legal requirements and to avoid actions which could have the effect that DATAGROUP or a company affiliated with DATAGROUP violates applicable law or may be punished according to applicable law.

We expect our suppliers

- to comply with all laws applicable to their company. Our suppliers support the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, or LkSG), the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the guidelines on the rights of the child and on corporate actions, the Core Labour Standards (CLS) of the International Labour Organization (ILO) as well as applicable national laws and regulations.
- to carefully select their own suppliers which they commission in the performance of their duties for the DATAGROUP Group. We also expect our suppliers to communicate the principles listed in this DATAGROUP Supplier Code of Conduct or equivalent principles and to encourage their suppliers to comply with these principles.
- to act honestly, responsibly and fairly.



Requirements for our Suppliers

Social Responsibility

RECOGNITION OF HUMAN RIGHTS

Our suppliers respect the universally recognized human rights.

BAN ON CHILD LABOR AND FORCED LABOR

Our suppliers condemn child labor, forced labor or other involuntary labor as defined by the ILO.

SAFETY, OCCUPATIONAL SAFETY AND HEALTH PROTECTION

Our suppliers ensure occupational safety and health protection for their employees at work under applicable laws and regulations. All hazards and resultant risks to an employee's health are evaluated appropriately and the necessary protective measures are taken. Furthermore, the employees are continuously instructed about the general safety regulations.

DISCRIMINATION, EQUAL OPPORTUNITIES, DIVERSITY AND INCLUSION

Our suppliers are committed to equal opportunities and do not discriminate against anyone because of their sex, ethnic and national origin, color, religion, age, disability, sexual orientation or identity or any other characteristics protected by law. They promote their working environment, which enables inclusion, and which is appreciated for its diversity of employees.

FAIR WORKING TIMES AND FAIR PAY

Our suppliers comply with all applicable national laws and binding industry standards on working hours, which also refers to overtime, breaks and paid vacation.

Our suppliers remunerate their employees appropriately and in line with applicable laws. The employees must receive all legally mandated benefits. Deductions from wages as a disciplinary measure are forbidden. The suppliers must ensure that their employees receive clear, detailed and regular written information about the composition of their wage.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Our suppliers respect their employees' right to freedom of association and collective bargaining in accordance with the relevant applicable laws and the conventions of the ILO.



Ecological Responsibility

ENVIRONMENTAL PROTECTION AND CONSERVATION OF NATURAL RESOURCES

Our suppliers ensure appropriate behavior in the context of their business activities to minimize environmental burdens and environmental threats. Furthermore, our suppliers comply with the respective applicable national laws, regulations and standards to protect the environment.

Continuous improvement in resource efficiency in the sense of a conscious and sustainable resource management is an integral part of the operational management of our suppliers. Harmful soil changes, water and air pollution, noise emission and excessive water consumption must be avoided.

HANDLING OF HAZARDOUS MATERIALS

When dealing with substances (substances, preparations and articles) which are considered as hazardous if they are disseminated in the environment, our suppliers ensure their safe handling, movement, storage, reuse or disposal.

RESPONSIBLE PROCUREMENT OF MATERIALS

In the context of conflict minerals (tin, tungsten, tantalum, gold) and other raw materials such as cobalt, if required, our suppliers implement processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-High-Risk Areas. Smelting and refining without adequately audited due diligence processes must be avoided.

Business Conduct

FAIR COMPETITION

Our suppliers comply with the relevant competition and antitrust legislation. In dealing with competitors, in particular, suppliers must apply antitrust legislation prohibiting agreements and other activities aimed at influencing prices or conditions.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Confidential information must be exchanged on the basis of a written and signed non-disclosure agreement between DATAGROUP and the supplier. The exchange of any confidential information must be restricted to the purpose of fulfilling the contractual performance requirements.

Our suppliers do not share or disclose intellectual property of DATAGROUP, confidential information or any other proprietary information to third parties (including, but not limited to, information developed by the supplier and information about products, customers, pricing, costs, expert knowledge, strategies, programs, procedures and practices).

Our suppliers do not disclose any material non-public information about securities of DATAGROUP or its affiliated companies and do not trade in the securities of DATAGROUP or its affiliated companies on the basis of material non-public information.



CORRUPTION AND BRIBERY

Our suppliers do not tolerate any form of corruption and economic crime by their own employees or by employees in the supply chain. The supplier complies with all applicable national and international anti-corruption laws and regulations. The highest standards of integrity must be applied in all business activities.

CONFLICTS OF INTEREST

In the context of their business activities with DATAGROUP, our suppliers take their decisions only on the basis of objective criteria and, immediately and without request, disclose any actual or potential conflicts of interest arising from activities for DATAGROUP.

MONEY LAUNDERING

Our suppliers abstain from any form of money laundering activities.

TRADE RULES

We expect our suppliers to respect all national and international trade laws and regulations about exports, imports, sanctions, customs, restrictions and embargos. We also expect this legal conformity from our suppliers along the value chain. Additionally, our suppliers guarantee the exchange of information about legal requirements of foreign trade with the aim of a secure supply chain. Our suppliers must ensure that neither their company nor their beneficial owners, representatives or any of their sub-contractors are included in the relevant sanction lists.



Compliance with Code of Conduct

DATAGROUP reserves the right to check whether the requirements in the Supplier Code of Conduct are complied with – for instance by way of self-disclosure, information by third parties, presentation of certificates and by granting permission to conduct field audits to have verified whether the rules of the Supplier Code of Conduct have been followed. The Supplier Code of Conduct is an integral part of all contracts between DATAGROUP and suppliers. Where non-compliance with the Supplier Code of Conduct is determined, the supplier draws up a report on the incident and determines corrective measures.

In the case of minor violations of this Supplier Code of Conduct, the supplier is usually given the opportunity to implement appropriate remedies within a reasonable time, if the supplier is in principle prepared to provide for remedy and improvement. In the case of serious violations (especially the commission of an offence), DATAGROUP reserves the right to impose appropriate penalties against the respective supplier. This may also include the termination of business relations with immediate effect and the assertion of damage compensation claims and other rights.

You are requested to give notice of any violations of the provisions of this Supplier Code of Conduct on the page below: <https://datagroup.integrityline.com/>

We hereby confirm that we have received the above Supplier Code of Conduct from DATAGROUP.

We undertake to comply with the relevant requirements and confirm that the Supplier Code of Conduct shall apply to all existing and future contractual relationships with DATAGROUP and/or companies affiliated with DATAGROUP.

(Place, Date)

(Stamp, Signature Supplier)