

Code of Conduct for Business Partners of the CONET Group

Content

4	Scope of Application and Validity
5	Foreword
7	Our Requirements for Business Partners
7	1. General Principles
7	2. Social Responsibility
8	3. Ecological Responsibility
8	4. Ethical Business Conduct
11	5. Risk Management & Audit Rights
12	Legal Consequences of Violations
15	Reports of Misconduct
17	Updates
17	Acknowledgement and Consent

© CONET Technologies Holding GmbH
All rights reserved
www.conet.de

The contents are copyrighted. Photographs used are purchased from stock.adobe.com unless they were made by ourselves.

Version 1.0 January 2024
Version 1.1 April 2024
Version 1.2 November 2024

Scope of Application and Validity

This Code of Conduct applies to all natural persons or legal entities that sell products or services to or provide services for the CONET Group themselves or through third parties such as subcontractors, agents, distributors or affiliated companies.

Business Partners shall also communicate the principles set out in this Code of Conduct in their own supply chain and monitor compliance with them.

Foreword




The companies of the CONET Group attach great importance to creating and maintaining long-term and successful business relationships. In addition to economic aspects, we also pay particular attention to ecological and social aspects. We shape our entrepreneurial actions sustainably and are constantly striving to improve in this area.*

We expect our Business Partners to act in an equally responsible manner. Compliance with the principles described in this Code is essential for the business relationship with our Business Partners and is considered the basis for cooperation.

A handwritten signature in blue ink that reads "Martin Wibbe". The signature is fluid and cursive.

Martin Wibbe
CEO

 All companies of the
CONET Group



Our Requirements for Business Partners

1. General Principles

In addition to complying with the provisions contained in the following sections, Business Partners must always comply with all applicable laws, official regulations and the contractual obligations agreed between the Business Partners and us.

The Business Partners also adhere to the ten principles of the United Nations Global Compact (UNGC), the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises (OECD), and all principles of the International Labour Organization (ILO), which are summarized below.

2. Social Responsibility

2.1 No Forced Labor

Any kind of forced labor such as servitude, peonage or slave labor is not tolerated. All work must be chosen voluntarily. This also includes the right of the employee to terminate the employment relationship at any time.

2.2 Prohibition of Child Labor

The use of child labor and its promotion is prohibited. We expect our Business Partners to comply with the recommendations of the ILO conventions, in particular on the minimum age for the employment of children (No. 138) and on the worst forms of child labor (No. 182). No one shall be employed who is younger than 15 years of age, who is still of compulsory school age or who has not yet reached the legal minimum age for employment. This may only be deviated from if a legal exception is permitted and its preconditions are fulfilled.

2.3 Fair Remuneration

The wage of the employees must at least correspond to the legally valid and guaranteed minimum. If there are no corresponding legal standards in the respective country, the wage must be set in accordance with ILO Convention No. 131 in such a way that it covers the basic needs through the setting of minimum wages. Wage deductions as punitive measures are not permitted. Employees must be informed transparently, regularly and in writing about the composition of their remuneration.

2.4 Working Time

Business Partners shall comply with the statutory provisions on working hours and sufficient rest periods, including vacation.

They will document the working hours of their employees and their remuneration in compliance with national laws and regulations and make these records available to us upon request.

2.5 Compatibility of Work & Family

We expect our Business Partners to contribute to the best possible work-life balance through family-friendly agreements.

2.6 Freedom of Association & Right to Collective Bargaining

Business Partners shall recognize any legal rights of their employees to (non-)membership in trade unions or comparable employee organizations and to participation in strikes and collective bargaining. In doing so, they shall comply with applicable national laws and international standards such as those of the ILO. The stricter regulation in each case must be observed. Furthermore, employees may not be discriminated against or sanctioned for exercising their rights in this regard. If the right to freedom of association is restricted by local laws, Business Partners must promote alternative options for employee representation that comply with the law. Employee representatives must also be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in accordance with the law.

2.7 Diversity & Equal Treatment

Business Partners shall prohibit and resolutely prevent any direct or indirect discrimination on the basis of ethnic origin, skin color, gender, religion, nationality, sexual orientation, social origin, age, physical or mental limitations, marital status, pregnancy, trade union membership or political views – insofar as these are based on democratic principles and tolerance of other opinions. We expect our Business Partners to promote diversity, equal opportunities and equal treatment in the workplace and in employment.

2.8 Occupational Health & Safety

Business Partners are responsible for a safe and healthy working environment. To this end, they must comply with national occupational health and safety and fire protection laws. According to ILO Convention No. 155, all occupational health and safety measures must be free of charge for employees. In addition, Business Partners must develop a management system that ensures a continuous reduction of work-related health hazards and an improvement in occupational health and safety and fire protection. Furthermore, Business Partners shall – taking into account the national legal regulations or standards – provide drinking water and toilet facilities for their employees.

2.9 Preservation of the Natural Basis of Life

Business Partners shall refrain from taking land, forests or waters, the use of which secures the livelihood of persons, in violation of legitimate rights. Business Partners shall refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this damages the health of persons, significantly impairs the natural basis for the production of food or prevents the access of persons to safe drinking water or sanitary facilities.

2.10 Dealing with Conflict Material

We expect our Business Partners to fulfill their due diligence obligations with regard to relevant conflict materials as defined in the OECD Guidelines, in particular tin, tantalum, tungsten, gold, cobalt and mica.

2.11 Complaint Mechanisms

Business Partners are responsible at the facility level for establishing an effective grievance procedure for individuals and communities who may be affected by adverse impacts.

3. Ecological Responsibility

3.1 Reduce Consumption of Raw Materials & Natural Resources

Business Partners are committed to optimizing the consumption of natural resources, including energy and water.

3.2 Dealing with Air Emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be typed prior to their release, routinely monitored, verified, and treated as required. In addition, we expect our Business Partners to monitor their emission control systems and to find and implement economical solutions to minimize emissions.

3.3 Waste & Hazardous Materials Handling

Business Partners shall identify, control, dispose of and recycle their waste responsibly. Business Partners shall comply with the prohibitions on the export of hazardous wastes in the Basel Convention of March 22, 1989, as amended. Chemicals or other materials that pose a hazard if released into the environment shall be identified and handled in a manner that ensures safety during any handling of such materials. Mercury shall be used in accordance with the prohibitions of the Minamata Convention of October 10, 2013, and persistent organic pollutants in accordance with the Stockholm Convention of May 23, 2001, as amended.

3.4 Treatment and Discharge of Industrial Wastewater

Wastewater from operations, manufacturing processes and sanitary facilities is to be typed, monitored, inspected and, if necessary, treated prior to discharge or disposal. In addition, measures are to be introduced to reduce the generation of wastewater.

3.5 Dealing with Energy Consumption/Efficiency

Energy consumption must be monitored and documented. Economic solutions must be found to improve energy efficiency and minimize energy consumption.

4. Ethical Business Conduct

4.1 Fair Competition

Our Business Partners shall respect fair and free competition. In particular, they shall not violate competition and antitrust laws.





4.2 Integrity / Bribery & Benefit Taking

The highest standards of integrity must be applied in all business activities. We do not accept any form of bribery, corruption, extortion or embezzlement. Likewise, we expect our Business Partners to take strict action against such behavior. To ensure compliance with anti-corruption laws, Business Partners will implement procedures for monitoring and enforcement.

4.3 Prevention Against Money Laundering & Terrorist Financing

We require our Business Partners to comply with legal obligations to combat money laundering and terrorist financing. We do not tolerate the involvement or facilitation of activities related to money laundering and terrorist financing.

4.4 Confidentiality & Data Protection

Confidential information entrusted to Business Partners by customers, other suppliers or other business partners must be protected. When collecting, storing, processing, transmitting and forwarding personal data and information, the applicable laws on data protection, information security and official regulations must be observed.

4.5 Intellectual Property

Intellectual property rights must be respected by our Business Partners. Technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected.

4.6 Export Control, Customs & Tax Law

Our Business Partners ensure that all export control, customs and tax regulations are complied with.

5. Risk Management & Audit Rights

We expect our Business Partners to identify risks related to human rights and environmental issues in their supply chains and to take appropriate measures as quickly as possible. In the event of suspected violations of the above principles in their supply chain or in their own business area, our Business Partners must inform us promptly.

In order for us to be able to ensure effective risk management, Business Partners agree that we may carry out audits at their premises once a year or on an ad hoc basis during normal business hours. Business Partners may object to individual audit measures if these would violate mandatory data protection regulations.

Legal Consequences of Violations

If a breach of the provisions of this Code is identified on our part, we shall notify our Business Partners of this in writing within one month and set a reasonable deadline for the Business Partners to remedy the grievances. If it is not possible to remedy the situation within this period, Business Partners must notify us immediately in writing. In this case, we shall attempt, together with our Business Partners, to draw up a concept with a time schedule for ending or minimizing the violation. If no remedy is found within the time schedule and no other milder means are available, we can and will terminate the business relationship.

In the event of serious violations of the Code of Conduct for Business Partners, we reserve the right to claim damages and to terminate existing contracts without notice.





Reports of Misconduct

Trust, integrity and transparency have a high priority in all our business relationships and are deeply anchored in our corporate culture CONET LIFE.

For this reason, we encourage our Business Partners in our supply chain, as well as their and our employees, to report violations of the Code of Conduct or other non-compliant behavior. Reprisals against employees who, in good faith, raise concerns about misconduct within the company are prohibited.

Reports on violations of our Code of Conduct for Business Partners can also be submitted via the CONET whistleblower system. The system is available in several languages and enables anonymous, confidential and specially encrypted communication with selected authorized recipients, who are obligated to treat all tips and the identity of the whistleblower as confidential.

You can access our whistleblower system via the following link or the QR code below:

<https://conet.whistleblower-system.de/>





Updates



This Code is reviewed and updated on a regular basis. The latest version of the Code of Conduct for Business Partners is available [HERE](#) →

Please sign and return to
businesspartnercheck@conet.de

Acknowledgement and Consent

By signing this document, the Business Partners undertake to act responsibly and to comply with the principles and requirements listed herein. Business Partners further undertake to communicate the contents of this Code to their employees, agents and subcontractors and to take all necessary precautions for the implementation of the requirements. Furthermore, by signing this declaration, Business Partners assure the accuracy of the information provided and undertake to actively inform us of any relevant changes.

date, name, signature

CONET Technologies Holding GmbH
Legal & Compliance Department
Bundeskanzlerplatz 2
53113 Bonn

E-Mail: compliance@conet.de

