

CODE OF CONDUCT

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Preamble

This Code of Conduct is based on a common basic understanding of socially responsible corporate management in the sense of the following guidelines.

We, KERPEN Datacom GmbH, assume responsibility within the scope of our respective possibilities and scope for action by considering the consequences of our business decisions and actions in legal, economic, technological, social, and ecological terms. In this regard, we contribute to the social and economic development of the countries and regions in which we operate.

Our actions are in accordance with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and probity as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labor standards of the International Labor Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct lays down the basic principles of our actions, which we actively demand that our employees adhere to. The content applies to all business units of our company.

We expect the same basic understanding from our business partners. This is not intended to create any rights to the benefit of third parties.

1. Basic understanding

KERPEN DATACOM bases its business actions and decisions on applicable ethical values, in particular integrity, credibility, and respect for human dignity. This suitably promotes transparency, responsible leadership, and control within the company.

This code of conduct represents binding rules that must be observed by every KERPEN DATACOM employee. Managing Directors and all managers bear responsibility for the active implementation of this code of conduct.

They must serve as a role model in every respect. This code is the basis and guide for overcoming ethical and legal challenges in daily work. Every employee can contact their supervisor or the management with questions or comments in this context.

KERPEN DATACOM expects its suppliers to comply with to the guiding values of the Code of Conduct.

2. Compliance with the law

Compliance with the applicable laws and other legal regulations of the countries in which we operate is vital for us. In case of local laws and regulations being less restrictive, our actions will be based on the principles of this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law will prevail. However, we strive to comply with the content of this Code of Conduct.

We have taken appropriate compliance¹ measures to cover the following topics adequately:

3. Integrity and Compliance

a. Corruption

We do not tolerate corruption, bribery, or extortion; they prevent fair competition.

We neither promise, offer, grant, demand or accept benefits in our business relationships that are associated with the intention or could give the impression of influencing business decisions or obtaining any other improper advantage. A particularly strict standard must be applied when dealing with people to whom special criminal and liability regulations apply (e.g., public officials).

¹Compliance means observing legal requirements, regulatory standards, voluntary commitments, and internal guidelines.

b. Fair competition

We act in accordance with national and international competition and antitrust laws and do not participate in price fixing, allocation of markets or customers, or anti-competitive agreements.

c. Money laundering prevention

Money laundering refers to the process of smuggling illegally earned money or assets into the legal financial and economic cycle. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

d. Protection of information and intellectual property

We protect confidential information and respect intellectual property. Transfer of technology and knowledge must be conducted in such a way that intellectual property rights and customer information, trade secrets and non-public information are protected. We observe the applicable laws for the protection of trade secrets and treat confidential information from our business partners accordingly.

e. Data protection

We process, store, and protect personal data in compliance with legal regulations. Personal data is collected confidentially, for lawful, pre-determined purposes only, and in a transparent manner. When processing personal data we ensure it is protected by appropriate technical and organizational measures against loss, alteration and unauthorized use or disclosure.

f. Export control

We comply with the legal standards relevant to export control - in particular, licensing requirements, export and support bans - when exporting our goods.

g. Avoidance of conflicts of interest

We avoid internal and external conflicts of interest that could illegitimately influence business relationships. Otherwise, we disclose these conflicts.

4. Health and safety

We protect the health of our employees by taking appropriate health and safety measures that adequately cover the following topics:

- compliance with applicable laws and guidelines towards international standards regarding health and occupational safety:

- appropriate workplace design, safety regulations, and provision of appropriate personal protective equipment;
- implementation of preventive controls, emergency response measures, an accident reporting system, and other appropriate continuous improvement measures;
- enabling access to enough drinking water and access to clean sanitary facilities for employees.

We ensure that all our employees are trained accordingly.

5. Compensation and working hours

The remuneration is based on the applicable laws and, if applicable, any existing, binding collective agreements and is supplemented by the relevant national minimum wage laws. Employees are informed in detail and regularly about the composition of their salary.

We comply with applicable laws, labor standards, and ensure that

- the working hours, including overtime, do not exceed the maximum permitted by the applicable law;
- employees have at least one full day off per calendar week.

6. Compliance with human rights

We respect and support compliance with internationally recognized human rights and

- respect the personal dignity, privacy, and personal rights of each individual;
- protect and ensure the right to freedom of opinion and expression;
- do not tolerate unacceptable treatment of employees, such as physical and psychological harshness, sexual and personal harassment, or discrimination.

a. Prohibition of child labor

We do not tolerate child labor. We do not employ employees who are not at least 15 years old and ask us to provide proof of their age. We do not employ employees for dangerous work who are not at least 18 years old in accordance with ILO Convention No. 182.

b. Prohibition of forced labor

Forced labor, modern slave labor or comparable measures depriving people of their freedom are prohibited. All work must be voluntary and there must be the possibility of ending the employment relationship.

c. Freedom of association and collective bargaining

We respect employees' rights to freedom of association, freedom of assembly and collective bargaining to the extent this is legally permissible and possible in the country in which we operate. If this is not permitted, we look for appropriate compromises for our employees.

d. Promoting diversity and diversity, equal opportunities

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin color, ethnic origin, gender identity and orientation, disability, religion, ideology, or others.

7. Environment, energy, and climate protection

We act in accordance with applicable laws and are guided by international standards to minimize negative impacts on the environment and to continuously improve our activities for environmental and climate protection.

All employees are made aware of environmental protection.

We have taken appropriate environmental protection measures that adequately cover the following topics:

- definition of goals and implementation of measures as well as their continuous improvement;
- environmental aspects, such as reducing CO2 emissions, increasing energy efficiency, using renewable energies, ensuring water quality, reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and its proper disposal, as well as responsible handling of substances that are dangerous to humans and environment.

8. Dealing with conflict minerals

We take due care to avoid the use of conflict minerals in our products to prevent human rights violations, corruption, and financing of armed groups or similar.

9. Supply chain

We expect our suppliers to comply to the principles of this Code of Conduct or to apply equivalent codes of conduct.

If doubts remain regarding compliance with this Code of Conduct, the supplier is requested to take appropriate countermeasures and report the matter to his responsible contact in our company. If necessary, the cooperation will be terminated.

10. Consumer interests

Where consumer interests are concerned, we adhere to consumer protection regulations and appropriate sales, marketing, and information practices. Groups in particular need of protection receive increased attention.

11. Implementation and enforcement

We make appropriate and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees are made aware of the contents of the Code of Conduct and receive training on relevant topics as required. Violations of the Code of Conduct will not be tolerated and can lead to consequences under labor law.

a. Communication

We communicate openly and in a dialogue-oriented manner about the requirements of this Code of Conduct and its implementation towards employees, customers, suppliers and other interest and stakeholder groups.

b. Notices of violations

We offer our employees and business partners access to a protected whistleblower mechanism to confidentially report violations of the principles of this Code of Conduct.

If you have any information, please contact the following person/office directly or anonymously.

mailto: HWG@vuv-consult.de

Telephone: +49 241 47433-54

Stolberg, February 28, 2024

KERPEN DATACOM GmbH

Managing directors

David Schlenter

Frank Wettstein