

# Supplier Code Of Conduct

## Introduction

This Supplier Code of Conduct outlines the principles and standards that EuroTeleSites Group requires its suppliers to adhere to in the areas of human rights, environmental protection, and ethical business practices. By adhering to this code, suppliers help EuroTeleSites Group ensure a responsible and sustainable supply chain, a strategic goal for the company in line with our corporate values Responsibility, Fairness and Trust.

## 1. Human

### 1.1 Human Rights

- **Respect and Dignity:** EuroTeleSites expects its suppliers to uphold and respect the fundamental human rights of all individuals, treating everyone with dignity and respect regardless of their position or background.
- **Child Labor:** EuroTeleSites expects its suppliers not to engage in or support the use of child labor. This includes ensuring that no person under the legal working age is employed.
- **Forced Labor:** EuroTeleSites expects its suppliers not to engage in or support the use of forced or compulsory labor. All employment must be voluntary.

### 1.2 Inclusion and Fight Against Discrimination

- **Non-Discrimination:** EuroTeleSites expects its suppliers to provide equal employment opportunities and ensure that no individual faces discrimination based on race, color, gender, age, nationality, religion, sexual orientation, disability, or any other legally protected characteristic.
- **Inclusion:** Suppliers should create and promote an inclusive work environment that values diverse perspectives and backgrounds. This includes fostering a culture where everyone feels valued and respected.
- **Harassment:** EuroTeleSites expects its suppliers to never allow harassment or bullying in the workplace. This includes not tolerate behavior—gestures, language, and physical contact—that is sexual, coercive, threatening, abusive, or exploitative in nature

### 1.3 Fair Labor Conditions

- **Wages and Benefits:** EuroTeleSites expects its suppliers to provide fair compensation to employees, including wages and benefits that meet or exceed legal minimum standards and are sufficient to meet the basic needs of employees.
- **Working Hours:** EuroTeleSites expects its suppliers to comply with applicable laws and industry standards on working hours and overtime, ensuring that employees are not overworked and have adequate rest periods.
- **Undeclared Work:** EuroTeleSites expects its suppliers not to engage in undeclared work. All work must be performed under lawful employment terms, with proper documentation and reporting to relevant authorities. This includes compliance with local statutory social insurance.

### 1.4 Safety at Work and Health

- **Safe and Healthy Work Environment:** EuroTeleSites expects its suppliers to comply with all applicable health and safety regulations and provide a safe and healthy working environment for their employees. This includes identifying and mitigating any risks of accidents and injuries through providing necessary protective equipment, conducting regular health and safety training, and ensuring that all safety protocols are followed.

## 2. Environment

### 2.1 Protection of Environment

- **Environmental Laws:** EuroTeleSites expects its suppliers to comply with all applicable environmental laws and regulations. This includes obtaining necessary permits and adhering to standards set by regulatory bodies.
- **Biodiversity:** Suppliers should take measures to protect natural habitats and biodiversity. This includes avoiding activities that harm ecosystems and promoting conservation efforts.

### 2.2 Reduction of CO2 Emission

- **Carbon Footprint:** EuroTeleSites expects its suppliers to strive to reduce their carbon footprint by implementing energy-efficient practices, using renewable energy sources, and optimizing logistics to reduce emissions.

### 2.3 Circular Economy

- **Sustainable Practices:** Suppliers should adopt practices that promote a circular economy, including designing products for longer life, reparability, and recyclability.
- **Resource Efficiency:** EuroTeleSites expects its suppliers to use resources efficiently, seeking to reduce resource consumption in their operations. This includes using sustainable materials whenever possible.
- **Waste Management:** EuroTeleSites expects its suppliers to minimize waste generation and promote recycling and reuse of materials. This includes proper handling and disposal of hazardous waste and adopting sustainable packaging solutions.

### 2.4 Protection of Soil and Water

- **Soil Conservation:** EuroTeleSites expects its suppliers to avoid practices that lead to soil degradation or contamination and take measures to preserve soil quality.
- **Water Management:** EuroTeleSites expects its suppliers to implement practices that prevent water pollution. This includes treating wastewater before discharge and using water-saving technologies.

## 3. Ethics

### 3.1 Fight Against Corruption

- **Anti-Corruption:** EuroTeleSites Group has a zero-tolerance policy regarding corruption. EuroTeleSites expects its suppliers not to engage in any form of corruption, including bribery, extortion, or embezzlement. This includes not offering or accepting bribes or other improper payments.
- **Transparency:** Suppliers should conduct their business transparently and maintain accurate records of all transactions. This includes providing accurate information to all stakeholders and cooperating with audits and investigations.

### 3.2 Fair Competition & Trade Compliance

- **Competitive Practices:** EuroTeleSites expects its suppliers to comply with all applicable antitrust and competition laws and not to engage in anti-competitive practices that unfairly limit competition or harm consumers such as price-fixing, bid-rigging, or market allocation. They must compete fairly and ethically in the market.
- **Trade Compliance:** EuroTeleSites expects its suppliers to comply with all applicable global trade laws, which include import and export control regulations, as well as sanctions and anti-boycott laws.

### 3.3 Conflict of Interest

- **Disclosure:** EuroTeleSites expects its suppliers to avoid conflicts of interest and disclose any potential conflicts to EuroTeleSites Group immediately. This includes any situations where personal or financial interests may interfere with the supplier's ability to act in the best interests of EuroTeleSites Group.
- **Integrity:** Suppliers should act with integrity and not seek to influence business decisions through improper means. This includes avoiding relationships or activities that could compromise impartial decision-making.

### 3.4 Gift and Hospitality

- **Appropriate Gifts:** EuroTeleSites expects its suppliers not to offer or accept gifts or hospitality that could improperly influence business decisions. Gifts and hospitality should be reasonable, infrequent, and transparent.
- **Policy Adherence:** Suppliers should adhere to EuroTeleSites Group's guidelines on gifts and hospitality, ensuring that any gifts or hospitality offered or received are consistent with local laws and industry standards.

### 3.5 Quality of Services and Continuous Improvement

- **Standards:** EuroTeleSites expects its suppliers to ensure that their products and services meet the required quality standards. This includes adhering to specifications, performance criteria, and safety requirements as well as the ability to demonstrate this performance with truthful evidence.
- **Continuous Improvement:** Suppliers should strive for continuous improvement in their processes, products, and services. This includes regularly reviewing and enhancing their operations to increase efficiency, reduce costs, and improve quality.

### 3.6 Prevention of Fraud and Violation of this Code

- **Anti-Fraud:** EuroTeleSites expects its suppliers to implement measures to prevent, detect, and address fraud in their operations.
- **Whistleblowing:** Suppliers as well as anybody else can report any issues regarding suspected or occurred fraud or violation of dispositions contained in this code of conduct by EuroTeleSites, its management, employees, suppliers or partner on the digital whistleblowing-platform: [Hinweisgebersystem \(whistleblowing-software.com\)](https://hinweisgebersystem.whistleblowing-software.com)

## Conclusion

EuroTeleSites Group expects all suppliers to comply with these standards and to ensure that their own suppliers and subcontractors also uphold these principles. Failure to comply with this code may result in the termination of the business relationship.

If necessary, suppliers will cooperate with EuroTeleSites Group to clarify, prevent or treat any issue that may arise and related to dispositions contained in this code of conduct.

The Management Board and Group Compliance Officer are responsible for approving and issuing this Code. This Code, effective from 5th of September 2024, is periodically reviewed for necessary revisions. Changes must be approved by the Management Board. The online version at <https://eurotelesites.com/about-us/procurement/> supersedes previous versions.