

# Code of Conduct for Partners

## Table of Contents

<b>Code of Conduct.....</b>	<b>1</b>
<b>for Partners .....</b>	<b>1</b>
<b>1 Code of Conduct for Partners .....</b>	<b>3</b>
<b>1.1 Preamble.....</b>	<b>3</b>
<b>1.2 General expectations of our Partners.....</b>	<b>3</b>
<b>1.3 Laws and regulations.....</b>	<b>3</b>
<b>1.4 Audit rights and transparency.....</b>	<b>4</b>
1.4.1 General .....	4
1.4.2 Conflict-regions .....	4
<b>1.5 Proper accounting and financial reporting.....</b>	<b>4</b>
<b>1.6 Diligence in dealing with business assets .....</b>	<b>4</b>
<b>1.7 Management systems and control mechanisms.....</b>	<b>4</b>
<b>1.8 Corporate Communications .....</b>	<b>5</b>
<b>1.9 Commitment to continuous improvement.....</b>	<b>5</b>
<b>1.10 Breaches of the CANCOM-Codex .....</b>	<b>5</b>
<b>2 Human rights and labour rights .....</b>	<b>5</b>
<b>2.1 General.....</b>	<b>5</b>
<b>2.2 Indigenous peoples.....</b>	<b>5</b>
<b>2.3 Child labour .....</b>	<b>5</b>
<b>2.4 Security supervisor.....</b>	<b>6</b>
<b>2.5 Forced labour and human trafficking .....</b>	<b>6</b>
<b>2.6 Fair working conditions .....</b>	<b>6</b>
2.6.1 Working hours .....	6
2.6.2 Wages and social benefits.....	6
<b>2.7 Health and safety at work .....</b>	<b>6</b>
<b>2.8 Prohibition of discrimination.....</b>	<b>6</b>
<b>2.9 Complaint options.....</b>	<b>6</b>
<b>3 Environment .....</b>	<b>6</b>
<b>3.1 General.....</b>	<b>7</b>
<b>3.2 Environmental protection .....</b>	<b>7</b>
<b>3.3 Environmental management systems .....</b>	<b>7</b>
<b>4 Integrity behavioural requirements.....</b>	<b>7</b>
<b>5 Prevention of and fight against corruption .....</b>	<b>7</b>
<b>6 Avoidance of conflicts of interest.....</b>	<b>8</b>
<b>7 Fair competition .....</b>	<b>8</b>
<b>8 Export control regulations and sanctions .....</b>	<b>8</b>
<b>9 Taxes and duties .....</b>	<b>8</b>
<b>10 General product safety and conformity.....</b>	<b>8</b>
<b>11 Protection of intellectual property, confidentiality and insider information .....</b>	<b>8</b>

# **1 Code of Conduct for Partners**

## **1.1 Preamble**

This Code of Conduct (abbreviated to "CANCOM Code") for partners of CANCOM Austria AG (abbreviated to "CANCOM") represents the expectation of a responsible business relationship.

The CANCOM Code of Conduct sets out the values and principles of behavior that we at CANCOM want to follow and that all our partners, their employees and other stakeholders in the supply chain are expected to adhere to. These values and principles of conduct form the binding foundation for CANCOM's global cooperation with its partners. The partner undertakes to take responsibility for the compliance with this CANCOM Code of Conduct of all persons involved in its value creation process (subcontractors, consultants, etc.).

For reasons of better readability, the simultaneous use of the language forms masculine, feminine and diverse (m/f/d) is dispensed with for personal designations and personal nouns. Corresponding terms apply to all genders for the purpose of equal treatment.

## **1.2 General expectations of our Partners**

This CANCOM Code sets out requirements and standards for partners. It is fundamentally based on the principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, as well as other international standards, norms, and guidelines. Supplementary and other regulations exist at global and/or regional and/or national level for various topics covered by this Code.

CANCOM requires its partners to fully comply with the CANCOM Code of Conduct or an equivalent standard, in all dealings with CANCOM but also towards individual CANCOM employees.

The CANCOM Code applies to all natural or legal persons who sell or provide products, processes or services to CANCOM (and all companies in which CANCOM directly or indirectly holds a majority stake), either themselves or through third parties, e.g., affiliated companies, distributors, subcontractors, agents (hereinafter 'partners').

Each partner shall comply with applicable laws, industry regulations and contractual terms as well as generally accepted standards of social responsibility.

Before entering into a business relationship, CANCOM conducts a suitability check with potential business partners in order to directly satisfy itself of their integrity, quality level, suitability and credibility. This Code of Conduct is accessible to every business partner via the CANCOM Austria AG website <https://www.cancom.at/en/agb>.

## **1.3 Laws and regulations**

CANCOM's partners undertake to comply with all applicable laws, regulations, or customs provisions of the countries in which they conduct business.

CANCOM also expects its partners to comply with the provisions of this document, should they be more stringent than laws or regulations. Should there be any contradictions between this document and applicable laws or regulations, the partner must inform CANCOM immediately.

## **1.4 Audit rights and transparency**

### **1.4.1 General**

CANCOM reserves the right to conduct regular audits at the partner's premises. During an audit, human and labor rights as well as environmental and business ethics are analyzed with regard to risks and impacts on CANCOM's procurement. The aim of such an audit is to use the findings to identify and minimize risks and undesirable impacts and to ensure responsible procurement on an ongoing basis.

The partner undertakes to allow such an audit within the framework of the CANCOM Code by CANCOM or by a third party commissioned by CANCOM.

At the request of the partner, the parties involved must conclude a confidentiality agreement regarding the circumstances disclosed during the audit or assessment.

CANCOM also expects its partners to define and continuously review similar arrangements with regard to their own operations and procurement.

### **1.4.2 Conflict-regions**

CANCOM's partners shall ensure that they conduct ongoing and effective due diligence to determine whether their own activities or those of their supply chains are located in or sourced from conflict-affected or other high-risk areas. If this is the case, enhanced due diligence measures shall be implemented.

In addition, the partner shall take all necessary precautions to monitor business relationships, corporate and financial transactions, and resource flows (e.g., tin, tungsten, tantalum, gold, and other conflict minerals) and ensure that they are not linked to the financing or support of armed actors who may benefit from profits from the sale of such goods and services.

## **1.5 Proper accounting and financial reporting**

The principles of proper accounting and, where applicable, financial reporting shall be observed at all times.

## **1.6 Diligence in dealing with business assets**

If the partner is provided with property, e.g., equipment, operating resources or information technology, software, data or intellectual property, the partner undertakes to handle it carefully and responsibly and to protect CANCOM's property from unauthorized access.

## **1.7 Management systems and control mechanisms**

CANCOM expects its partners to have adequate management systems and control mechanisms in place to ensure compliance with the CANCOM Code or equivalent agreed standards. The functioning and quality of the partner's management system should be proportionate to the size, complexity, and risk environment of the partner. In addition, CANCOM encourages its partners to ensure and monitor compliance with the CANCOM Code or an equivalent code of conduct also by their suppliers and subcontractors.

## **1.8 Corporate Communications**

CANCOM-related statements or statements in public or via social media by the partner as well as the use of the CANCOM logo for the partner's own purposes shall only be made with the express written consent of CANCOM.

## **1.9 Commitment to continuous improvement**

CANCOM is aware that the guidelines defined here have varying degrees of maturity and is therefore committed to working with its partners to continuously improve this document based on current standards.

If CANCOM finds that a partner does not meet the requirements and expectations set out in this Code of Conduct for Partners, CANCOM can support the partner. The aim is to report weaknesses together with the partner or to work out and bring about improvements together. The partner is required to inform CANCOM immediately of any improvements achieved.

## **1.10 Breaches of the CANCOM-Codex**

In the event that partners become aware of violations of the CANCOM Code or equivalent standards, they must take immediate action and take appropriate steps. CANCOM must be informed in detail and promptly of such violations and will take appropriate action depending on the severity of the violation.

Persistent non-compliance with these guidelines or repeated and unjustified refusal to provide the required information may lead to suspension or termination of the activity as a partner for CANCOM.

# **2 Human rights and labor rights**

## **2.1 General**

International human rights are to be strictly observed.

All requirements defined here regarding the personnel of CANCOM's partners with regard to the CANCOM Code apply to all employees of the partner (including foreign workers, student employees and contract workers, etc.). Every employee has the right to freely take up and terminate his or her employment.

Any actions that may have a negative impact on a human right must be stopped immediately by the partner or appropriate preventive measures must be taken.

## **2.2 Indigenous peoples**

All CANCOM partners commit to strictly respect the rights of indigenous and tribal peoples, their social, cultural, environmental, and economic interests, including their connection to lands and other natural resources.

## **2.3 Child labor**

CANCOM strictly rejects any form of child labor. All CANCOM partners must combat all forms of child labor and may not participate in or enrich themselves from any form of child labor. The relevant laws must be complied with.

## **2.4 Security supervisor**

Each CANCOM partner must ensure that any type of security personnel, including contracted security personnel, respects human rights and dignity and applies a countermeasure appropriate to the situation in the event of a threat.

## **2.5 Forced labor and human trafficking**

Partners of CANCOM are not permitted to engage in or benefit from forced labor, including servitude, involuntary prison labor, slavery, servitude, or work performed under threat of punishment or coercion.

CANCOM does not accept any form of forced labor or human trafficking ('modern slavery').

## **2.6 Fair working conditions**

### **2.6.1 Working hours**

CANCOM's partners undertake that working hours and overtime will only be carried out in accordance with the applicable legal provisions and requirements.

### **2.6.2 Wages and social benefits**

Partners of CANCOM must pay a fair wage, including fringe benefits, that covers at least basic needs. Employees must be paid for overtime at a rate of remuneration that is higher than the regular rate of remuneration. Workers' rights to freedom of association, assembly, collective bargaining, and collective bargaining, to the extent permitted and possible by law in the respective country, must be respected.

## **2.7 Health and safety at work**

Partners undertake to comply with national and international regulations for ensuring health and safety at work. Appropriate systems shall be put in place to avoid risks to health and safety.

## **2.8 Prohibition of discrimination**

All forms of discrimination in employment and occupation are rejected. Unjustifiable grounds for discrimination include, but are not limited to: Origin, color, sex, age, language, property, nationality or national origin, caste, economic background, disability, pregnancy, membership of an indigenous group, membership of a trade union, political opinion, sexual orientation.

## **2.9 Complaint options**

An appropriate grievance mechanism shall be made available from the Partner to its employees as well as affected groups of people to submit questions, comments, recommendations, reports, statements or complaints regarding the workplace, environmental issues, or business practices of the partners.

## **3 Environment**

### **3.1 General**

CANCOM expects its partners to act responsibly with regard to environmental risks and impacts and to use natural resources efficiently, as well as to apply environmentally friendly production methods. Compliance with national and international legal provisions and standards on environmental protection is assumed.

Any kind of illegal treatment/disposal of waste is prohibited. In order to demonstrate and develop these topics and indicators, CANCOM recommends that partners join appropriate initiatives or have suitable ratings (e.g., CDP - Carbon Disclosure Project).

Upon CANCOM's request, the partner shall submit the product CO<sup>2</sup> footprint (Scope 1-3) for the products, processes and services delivered to CANCOM.

The collection, calculation, evaluation, and communication of the relevant CO<sup>2</sup> data shall comply with applicable norms and standards of the Greenhouse Gas Protocol (GHG Protocol).

### **3.2 Environmental protection**

The aim of all CANCOM's partners must be to avoid or reduce waste or emissions generated in the course of their business activities. In this context, efficient technologies must be used to reduce the environmental impact as much as possible.

### **3.3 Environmental management systems**

The partner's activities that have an impact on the environment must take into account a structured and systematic approach to environmental considerations. In addition to the introduction of appropriate management systems to improve environmental performance and the setting of targets, this also includes verification that the targets have been met. At CANCOM's request, the partner shall provide evidence of certification in accordance with DIN ISO 14.001.

## **4 Integrity behavioral requirements**

Each partner shall comply with applicable national and international legal requirements in its business activities and follow internationally agreed standards of business ethics.

## **5 Prevention of and fight against corruption**

No partner of CANCOM may engage in or tolerate corruption, bribery, money laundering, extortion, or embezzlement in any form. In addition, partners must not offer or accept benefits or other means to obtain unfair or improper advantage. Such improper benefits may include cash, gifts in kind, pleasure trips or services and amenities of other kinds.

CANCOM does not tolerate any form of corruption. Actual or potential conflicts of interest must be avoided. Even the appearance of corruption or a conflict of interest is inadmissible.

Offering, granting, promising, demanding and accepting an advantage are inadmissible if the advantage is

- has as its purpose the performance or omission of an official or legal duty or act, or
- is issued for the purpose of obtaining a private or business advantage, or

- would influence, or even appear to influence, a person's decisions or behavior, and always,
- if it is granted in the form of cash or kickback payments.

## **6 Avoidance of conflicts of interest**

CANCOM's partners must endeavour to avoid conflicts of interest that could affect the partner's credibility within CANCOM or external parties' trust in CANCOM.

## **7 Fair competition**

CANCOM's partners must strictly comply with applicable competition laws and regulations, including the obligation not to exchange commercially sensitive and strategic information with competitors and not to enter into agreements with a business partner that restrict competition. Any restriction of free competition through market agreements, market abuse and the abusive exploitation of market position is rejected. This applies to tenders as well as to ongoing business.

## **8 Export control regulations and sanctions**

National and international laws and regulations govern the import, export, re-export, trading, brokering, or financing transactions, the provision of services and the transfer of goods (commodities, software, and technology). CANCOM's partners must ensure through appropriate processes that transactions and activities with both third parties and CANCOM do not violate export control and sanctions law and that any required evidence and information is provided without delay. This includes import and export laws, export controls, economic sanctions, banned lists and anti-boycott laws.

## **9 Taxes and duties**

All applicable tax laws and customs regulations must be complied with by CANCOM's partners.

## **10 General product safety and conformity**

Product safety, as well as the health and safety of persons, are of paramount importance to CANCOM. Therefore, CANCOM strives to comply with all legal and regulatory requirements applicable at the time of placing the product on the market, in particular the legal provisions of product safety regarding development, production, use and properties, in order to ensure the conformity of all processes, products and services. In doing so, CANCOM takes into account the current state of science and technology as well as the justified safety expectations of end users throughout the entire life cycle. CANCOM also requires this of all its partners.

## **11 Protection of intellectual property, confidentiality and insider information**

Intellectual property rights, assets and confidential information shall be respected by CANCOM's partners and protected accordingly by preventing misuse, theft, fraud, or improper disclosure.

Protection of and respect for personal rights must be respected without exception. In the course of this, the Partner shall define suitable measures to ensure compliance with the applicable requirements and laws, in particular in the handling of personal data. In any case, the applicable laws, and regulations with regard to data protection (e.g., Basic Data Protection Regulation) must be observed.



Data processed in IT systems must be protected in the best possible way, but at least in accordance with the law.

It is prohibited to misuse insider information, e.g., concrete information which, if it became publicly known, would be capable of significantly influencing the price of listed securities (to engage in insider trading, to unlawfully disclose insider information) and to manipulate the market. Partners who possess such insider information must treat it as strictly confidential. Insider information may not be disclosed to third parties and may not be used to recommend the purchase or sale of securities or other financial instruments.