

# Code of Conduct for business partners

## 1. Introduction

No distinction can be made between financial success and social responsibility. Responsible and ethical conduct towards employees, business partners, the company and the environment are a fixed part of the value system of the telent GmbH, including the companies affiliated with the telent GmbH. The compliance with rights and the law in our entrepreneurial actions is a matter of course for us. The Code of Conduct for business partners of the telent GmbH is based on the internationally recognised standards for the responsible management of the company. This includes among others the Global Compact of the United Nations (UN) and the labour and social standards of the International Labour Organisation (ILO).

Therefore, the telent GmbH stipulates binding minimum requirements in the business relationship to the telent GmbH and the companies affiliated with it for its business partners.

The telent GmbH expects from its business partners that they comply with and implement the standards of the Code of Conduct for business partners of the telent GmbH without exception.

Business partners within the meaning of this Code of Conduct are all third parties, which operate for, with or by order of the telent GmbH and its affiliated companies. These are, for example, subcontractors and / or their subcontractors, suppliers, distribution partners, consultants, brokers, commercial agents, architects, engineers, freelancers and other companies, which provide work services or other services, renters of vehicles, devices, tools, containers, plants, etc.

## 2. Integrity

2.1 **Our business partners** comply with applicable law on a local, national and international level.

A trustworthy and sustainable business relationship can only be secured if our business partners comply with all applicable laws and regulations. The telent GmbH in particular expects foreign business partners to inform themselves about the currently applicable rules at the place where its contract is implemented. Insofar as stricter regulations prevail in individual countries than described in this Code of Conduct for business partners, the stricter regulations are applicable.

2.2 **Our business partners** reject each form of corruption and bribery both of public officials as well as of employers of private companies. The telent GmbH expects its business partners to strictly prevent all possible forms of bribery and corruption in their scope of influence and to only grant benefits, such as for example within the scope of invitations or in connection with advertising measures, donations and sponsoring, to the extent as permitted by law. Before issuing invitations or handing over benefits for the benefit of employees of the telent GmbH our business partners will examine whether the invitation or benefit is compatible with the Code of Conduct of the telent GmbH.

2.3 **Our business partners** will refrain from and prevent all forms of fraud, submission of false claims and other behaviour that may lead to an asset damage at the telent GmbH, the customers of the telent GmbH or the social insurance funds and / or Inland Revenue Offices.

Examples for asset damaging offences are, among others, fraud, accounting fraud, social security fraud, bribery offences, moonlighting, theft, embezzlement, tax evasion, money laundering, withholding and embezzlement of pay, etc.

- 2.4 **Our business partners** comply with the applicable antitrust and competition law. They shall in particular refrain from competition-damaging agreements with competitors, suppliers, distribution companies, dealers and customers as well as other practices that constrain competition. This shall not only include price agreements with competitors, the division of customers or sales territories between competitors, boycotts in breach of competition and the direct or indirect exchange of information relevant to competition with other competitors, but also the exertion of all influence on the market behaviour of other competitors.
- 2.5 **Our business partners** shall respect and protect intellectual property of all kinds. Confidential information about the telent GmbH and the companies affiliated with it are to be treated strictly confidential by the business partners. It may not be forwarded by our business partners and their employees to third parties, which have no right to this information. This shall also include all information of a textual or graphical kind, data, photos etc., which the telent GmbH or the companies affiliated with it have received from their customers or other business partners.
- The business partners undertake to exclusively use the information made available by the telent GmbH and its affiliated companies to fulfill its contractual obligations with the telent GmbH. They shall not use this information for own or personal purposes of employees, which are not permitted by law, or for other unethical or illegal purposes or activities. The communication of confidential information in public and in social media or the unauthorised forwarding of information about the telent GmbH or its business partners to third parties or media shall represent a substantial breach of the principle of confidentiality. The business partners shall as proven obligate their employees to protect confidential information, business and trade secrets.
- 2.6 **Our business partners** shall comply with the applicable laws and rules, if personal data and information are collected, stored, processed or transferred. The personal data shall include e.g. name, address, phone number, date of birth, size, physical features, etc.

### 3. Employees

- 3.1 **Our business partners** shall respect and support the protection of the globally recognised human rights and ensure that the principles of the UN Global Compact and the ILO core labour standards are complied with in their field of services. The bans on child and forced labour shall be complied with hereby without exception.
- 3.2 **Our business partners** shall comply with the statutory regulations for fair working conditions and enable their employees to address topics openly and without fear of reprisals. The business partners shall in particular comply with the European regulations, here for example the German, Austrian, Swiss and Romanian regulations on the safeguarding of minimum working conditions, the EU Posting of Workers Directive [*EU Entsenderichtlinie*], for the Federal Republic of Germany for example the Minimum Wage Act [*Mindestlohngesetz*], the German Posted Workers Act [*Arbeitnehmerentsendegesetz*] and the German Labour Leasing [*Arbeitnehmerüberlassungsgesetz*] and will actively assist in preventing breaches of mandatory labour and social regulations as well as tax laws in their area.

Attempts at intimidation and reprisals towards employees, who report an actual or presumed misconduct in good faith, will not be tolerated from our business partners. Our business partners will also give their employees the possibility to confidentially point out possible Compliance problems or Compliance breaches.

- 3.3 **Our business partners** shall ensure a working environment that is free of discrimination for reasons of ethnic origin, the nationality, gender, pregnancy or parenthood, marital status, age, a disability, religion or ideology, sexual orientation or for other reasons that fall under a ban on discrimination.
- 3.4 **Our business partners** shall ensure a healthy and danger-free working environment of their employees by complying with all laws and other regulations and regulations relating to health and safety at the workplace. This shall in particular also include the correct and full equipment of the employees with the necessary protective equipment, the timely creation of risk analyses as well as the sufficient and repetitive training of the employees in all occupational safety concerns, which relate to their workplace. The material and tools made available by our business partners to the employees are safe and comply with the EU – specifications respectively the specifications in the country of deployment of the employee.

#### 4. Environment

**Our business partners** assume responsibility for environmental and climate protection as well as for a gentle handling of the natural resources. Necessary official permits, licences and registrations must be available at the business partner before awarding a contract and be upheld during the entire term of the contract. The telent GmbH requires from its business partners that they minimise negative implications on the climate, the environment and the animal world by an effective re-use and recycling of materials and use of suitable substitute materials.

Biological, chemical or other materials, which may pose a danger for humans, animals or the environment, are to be identified and controlled in order to guarantee a safe handling of these. This shall not only apply to the storage, movement and use of these materials, but also to their recycling and disposal. It is expected from the business partners that they reduce or avoid waste of all kinds. All activities with potential negative implications on the health of humans, animals or the environment are to be controlled conform to the law and guidelines and to be documented in line with the stipulations.

#### 5. Business partners – Compliance

- 5.1 **Our business partners** shall guarantee the implementation and compliance with the Code of Conduct for business partners of the telent GmbH. For this purpose, they will also pass the values and principles of the Code of Conduct for business partners onto their employees and will work towards ensuring that these comply with the values and principles.
- 5.2 **Our business partners** will work towards ensuring that their own business partners, which are deployed for or in the name of the telent GmbH or the companies affiliated with the telent GmbH, shall also accept these minimum requirements of the Code of Conduct for business partners as per contract and will comply with these during the implementation of the contract.
- 5.3 Breaches of the companies connected with the telent GmbH as per contract or the companies affiliated with the telent GmbH may lead to adequate measures.

In case of a suspicion of a breach of the Code of Conduct for business partners of the telent GmbH the business partner will support the telent GmbH in clarifying the facts.

The telent GmbH reserves the right to reasonable reactions in the event of proven breaches of its Code of Conduct for business partners, which are dependent on the severity of the breach. The range of the possibilities for reaction shall extend from the request of the telent GmbH to stop the breach to the extraordinary termination of the contract with the assertion of claims for damages.

## **6. Questions relating to Compliance and report of breaches**

For questions and to report breaches of Compliance – stipulations the following communication channels are available for the business partners.

[compliance@zech-group.com](mailto:compliance@zech-group.com)

The Compliance – department can be contacted by post under the address

Zech Group SE

Compliance – Department

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