



## **Code of Conduct for Vendors and Business Partners**

ALSO connects vendors and buyers of the ICT industry. We offer services at all levels of the ICT value chain from a single source. Through the ALSO ecosystem, we have access to all market participants: technology manufacturers, technology service providers, resellers and end users. For us, responsible corporate management means sustainable profitable growth, acting ethically and improving people's quality of life with technology. It is the foundation of our corporate ethics and it guides our commercial activities. Furthermore, we consider it our responsibility to ensure good governance and sound business practices throughout our value chain. We acknowledge the complexity of our global supply chain and the risks we face together. In this light and with the aim to support our joint efforts to strengthen the sustainable business practices in the industry, we have drafted this Code of Conduct for Vendors and Business Partners, that outlines the requirements to our business partners.

### **Scope**

This Code of Conduct for Vendors and Business Partners (Code) applies to all vendors, business partners and their employees, agents, and subcontractors (collectively referred to as "business partners") who directly or indirectly provide goods and/or services to ALSO Holding AG and its subsidiaries. We expect our business partners to recognize and accept their responsibility in the areas of human rights, labor, environment and anti-corruption.

Our Code is based on following requirements and principles:

### **Compliance with laws and regulations**

The business partner shall comply with all applicable laws and regulations in regard to all areas of their business and its operations. Business Partners shall verify the compliance with this Code within their own operations and through their supply chain. Stricter rules than those described in this Code may be in place in certain countries or business areas. Where multiple rules address the same subject and do not conflict with each other, the higher standard shall be applied.

### **Human rights and International Labor Standards**

The business partner is expected to respect human rights within its business operations arising out of the international treaties, in particular the United Nations Universal Declaration of Human Rights and the UN Global Compact.

Aligned with International Labor Standards (ILO), the business partner commits to uphold labor standards and provide work conditions based on freedom, equity, security and dignity.

We accordingly expect our business partners to meet the following requirements:

- to respect children's right to development and to receive education. The business partner must never use or benefit from child labor
- never to induce or benefit from any form of forced or involuntary labor and must support the elimination of all forms of forced and compulsory labor
- to allow their employees to freely associate with others, form and join (or refrain from joining) organizations of their choice, and bargaining collectively
- to ensure equal rights and opportunities, must not discriminate based on race, ethnicity, gender, age, religion, political affiliation, union membership or sexual orientation
- to compensate employees fairly, pay wages in a transparent manner and in compliance with national laws and legal minimum standards
- to commit to create and uphold safe working conditions and a healthy work environment that comply with applicable laws and regulations and
- to respect employees' right to privacy when gathering or storing personal information.

### **Environmental protection**

We expect that our business partners operate in an environmentally responsible and efficient manner. We encourage our business partners to minimize their environmental impact and to undertake initiatives to promote greater environmental responsibility and the development of environmentally friendly technologies.

We expect our business partner to meet the following requirements:

- comply with applicable environmental laws, regulations and standards
- have an environmental policy in accordance with their size and type of operation and
- ensure proper management and recycling of waste in an environmentally sound and traceable manner.

### **Responsible sourcing of minerals**

If the business partner supplies products or components of the products which contain metals or minerals covered by the OECD "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas", the business partner must ensure compliance with these guidelines.

We expect the business partner to promote responsible sourcing practices in its own mineral supply chain with the aim of sourcing conflict free minerals and avoid unsustainably mined minerals and support relevant industry efforts to eradicate the use of conflict minerals and develop responsible sourcing practices.

## **Business Integrity**

The business partner shall conduct its business in an ethical and responsible manner and must comply with applicable competition laws and regulations and must not cause or be part of any breach hereof. Corruption and bribery are not tolerated in any form. The business partner shall have a clear policy against corruption in all its forms, including but not limited to extortion, solicitation, bribery of public officials, private sector bribery, fraud and money laundering.

The business partner shall ensure that sufficient procedures for potential conflict of interest situations are in place and shall always disclose any financial interest an employee of ALSO Holding AG or its subsidiaries may hold in the business partner's enterprise.

## **Compliance with this Code**

The business partner must ensure fulfillment of its obligations under this Code and be able to provide documentation to demonstrate compliance with the requirements of this Code upon request from ALSO.

We are on a continuous basis auditing our business partners' compliance with this Code, where the business partner may be asked to participate in the annual business partner screening process. In addition, subject to prior notice, we reserve the right to perform an audit at the business partner's premises or sites.

In case of human rights violations and/or environmental destruction by one of your suppliers, you are obliged to notify us immediately. Based on this information, we will conduct a risk analysis, implement a strategy to minimize and avoid the problem, as well as establish prevention measures.

If ALSO learns about cases of non-compliance with the Code, a dialogue to clarify the concrete circumstances will be initiated. In the event of serious breaches of the requirements stated in this Code of Conduct, ALSO reserves the right to terminate the relationship with the business partner.

The business partner is encouraged to ask questions regarding any matter related to this Code, and to report any ethical concerns or suspected cases of non-compliance with this Code. In these cases, the business partner can contact [compliance@also.com](mailto:compliance@also.com) at any time.

We also expect our business partners to report to us any potential violations of the rights and principles set forth in this Code of Conduct. This includes violations committed by ALSO employees. In such a case, please contact the independent ombudsman Dr. Carsten Thiel von Herff who can be contacted confidentially outside of ALSO viaphone 0049 521 55 7 333 0 or by email at [ombudsmann@thielvonherff.de](mailto:ombudsmann@thielvonherff.de) or at [www.report-tvh.com](http://www.report-tvh.com).

The business partner hereby confirms to have read and understood the Code of Conduct for Vendors and Business Partners and has noted that compliance to the Code is an essential prerequisite for business relations between ALSO Holding AG, its subsidiaries, and the business partner.

Signature:

Vendor/Business Partner:

Authorized Signatory (name and title):

Date: