

# » Business Partner Code of Conduct «

# Table of Content

Business Partner Code of Conduct – Summary ..... 3

Introduction..... 4

Relationships and Behaviour in the Marketplace ..... 5

Workplace Commitments..... 7

Engagement with Communities, Regulators and the Public..... 8

Reporting and Addressing Non-Compliance ..... 9

# Business Partner Code of Conduct – Summary

This Business Partner Code of Conduct (“Code”) sets the standards by which EQS Group AG and its affiliates (EQS) expects all of EQS’ suppliers and partners to comply with. This summary provides a quick overview of the principles which are explained in more detail in the Code.

## Relationships and Behaviour in the Marketplace

### Ethical behaviour and Compliance with Applicable Laws

Business Partner will comply with applicable laws, regulations and external standards which sets the floor of supplier’s or partner’s behaviour; while behaving ethically – doing what is right – may demand going beyond what is legally required by applicable law.

### Anti-Corruption and Preventing Bribery

Business Partner may not offer, pay or accept bribes or improper payments in the course of doing business, and do not engage or allow others to do so on their behalf. Business Partner follows anti-bribery legislation.

### Antitrust and Fair Competition and Intellectual Property Rights

Business Partner will lawfully compete in the marketplace and comply with applicable antitrust and competition laws and respect intellectual property rights of others.

### Conflicts of Interest

Employees of Business Partner may not engage in any activity that would create a conflict of interest between their personal interests and the best interests of their company.

### Anti-Money Laundering

Business Partner will not condone, facilitate or support money laundering.

### Conflict Materials

Business Partner will take reasonable efforts to avoid in its products the use of raw materials which directly or indirectly finance armed groups who violate human rights.

### Trade Compliance

Business Partner will operate their business in compliance with all applicable trade-related laws, such as trade compliance, applicable import and export laws and laws and regulations relating to secondary boycotts.

### Relationships with Suppliers, Vendors and Contractors

Business Partner will treat its suppliers, vendors and contractors (“Third Parties”) fairly and transparently at all times and in a manner conforming to all applicable laws.

## Engagement with Communities, Regulators and the Public

### Environmental Protection and Sustainability

Business Partner is committed to protecting the environment and the health and safety of their communities and the public through full compliance with all applicable laws and international standards as well as continuous improvement of their performance.

### Lobbying

Lobbying efforts by Business Partner on behalf of EQS are strictly prohibited.

### Speaking on Behalf of or About EQS

Business Partner is not authorized to speak with regulators, the media, investors or industry analysts on behalf of EQS, unless authorized to do so by a member of senior management of EQS.

### Independent Contractor

Business Partner is an independent contractor, whose relationship with EQS is established exclusively by the terms of the relevant contract between the parties.

Business Partner is not, and may not describe themselves as, agents, representatives, or employees of EQS.

## Workplace Commitments

### Equal Opportunity and a Non-Discriminatory Working Environment

EQS is committed to the principles of equal employment opportunity and inclusion. EQS expects its Business Partners to be committed to the same principles. Business Partner will

- › Conduct business and employment practices in a non-discriminatory manner;
- › Make employment-related decisions based on company needs, job requirements and individual qualifications and provide fair remuneration and to guarantee the applicable national statutory minimum wage;
- › Comply with the maximum number of working hours laid down in the applicable laws;
- › Comply with laws regarding employment of immigrants and noncitizens and provide equal employment opportunity to everyone who is legally authorized to work in-country;
- › Respect the personal dignity, privacy and rights of each individual;
- › Prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- › Recognize, as far as legally possible, the right of free association of employees and

to neither favour nor discriminate against members of employee organizations or trade unions.

### Human Rights

Business Partner is opposed to child labour or the use of forced or compulsory labour.

### Health and Safety of Employees

EQS expects its Business Partners to take responsibility for the health and safety of their employees.

## Reporting and addressing Non-Compliance

### Reporting

Business Partner is expected to immediately report any (potential) compliance violation or violation of this Code via EQS Integrity mailbox [integrity@eqs.com](mailto:integrity@eqs.com) or use EQS’s whistleblowing application “EQS Ethics Line” at <https://eqs-ethics-line.com> that allows anonymous reporting.

### Addressing Non-Compliance

EQS will take appropriate action against any Business Partner whose actions are found to violate applicable law or this Code. Actions may include immediate termination of the business relationship by EQS at our sole discretion.

### Continuous Modification

This Code is subject to modification.

# 1. Introduction

## 1.1. Purpose

EQS success as a company is built on a foundation of commitment by each of our employees to make decisions with the long-term value of the company in mind. Ethical behaviour and compliance with applicable laws is expected by each of EQS' employees but also by our Business Partner, regardless of position or location.

This Code of Conduct ("Code") sets the standards by which EQS expects all of EQS' Business Partners to comply with. All Business Partners are expected to uphold these standards in day-to-day activities, comply with all applicable policies and procedures, and ensure that all their employees, agents and downstream suppliers are aware of, understand and adhere to these standards.

This Code is based to a great extent on the principles of the UN Global Compact relating to human rights, labour standards, environmental protection and anticorruption initiatives. These principles are derived from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption.

## 1.2. Applicability

The obligations described in this Code apply to all business partners of EQS Group AG and all other entities that are directly or indirectly controlled or managed by EQS Group AG and its affiliates ("EQS"), including suppliers, contractors, service providers, cloud providers, hosting providers, resellers, distributors, system integrators, cooperation partners, marketing partners, and any other partner that generate interest in EQS products and/or services and/or referral sales of EQS products and/or services (together "Business Partner").

The Code supplements and forms part of any agreement between EQS and its Business Partners.

## 2. Relationships and Behaviour in the Marketplace

### 2.1. Ethical behaviour and Compliance with Applicable Laws

Business Partner will comply with applicable laws, regulations and external standards which sets the floor of supplier's or partner's behaviour; while behaving ethically – doing what is right – may demand going beyond what is legally required by applicable law.

EQS expects the Business Partner to follow the Code and good ethical and business judgment even in countries in which common trading or negotiating practices are based on customs or laws that are different from or less stringent than this Code.

### 2.2. Anti-Corruption and Preventing Bribery

Business Partner may not offer, pay or accept bribes or improper payments in the course of doing business, and do not engage or allow others to do so on their behalf. Business Partner follows anti-bribery legislation.

**Business Partner will:**

- › Monitor continued compliance with anti-bribery legislation to ensure compliance with the highest moral, ethical and professional standards.

**Business Partner will not:**

- › Make any direct or indirect payments – including loans, gratuities, funds, gifts, hospitality or anything else of value – to any government official, employee, political party or candidate of any country, nor to any private entity or party, in order to (1) obtain or retain business; or (2) direct business to any other person or entity; and
- › Authorize any such payments – whether in cash or otherwise – to be made through a third party, if partner or supplier know or are substantially certain that any portion of the payment will be used to do so.

### 2.3. Antitrust and Fair Competition and Intellectual Property Rights

Business Partner will lawfully compete in the marketplace and comply with applicable antitrust and competition laws and respect intellectual property rights of others

**Business Partner will not:**

- › Interfere with a competitor, client or supplier's business relationship through false disparagement or other means, or unlawfully block competition in dealing with clients or suppliers; and
- › Discuss or agree with competitors on prices, production, volumes, where to sell or on other competitive matters.

### 2.4. Conflicts of Interest

Employees of Business Partner may not engage in any activity that would create a conflict of interest between their personal interests and the best interests of their company. Personal interests may include commercial, industrial, banking, consulting, legal, accounting, charitable and financial relationships, among others.

**Business Partner will**

- › Establish measures which prevent conflict of interests;
- › Take care that no family or other personal relationship is used to improperly influence the employees' business judgement; and
- › Ensure that its employees do not use their position to offer gifts, invitations or other advantages to EQS employees. This does not apply to occasional gifts of purely symbolic value or meals or entertainment of appropriate value.

## 2.5. Anti-Money Laundering

Money laundering is conduct designed to disguise proceeds of criminal activity by individuals or entities. Business Partner will not condone, facilitate or support money laundering.

## 2.6. Conflict Materials

Business Partner will take reasonable efforts to avoid in its products the use of raw materials which directly or indirectly finance armed groups who violate human rights.

## 2.7. Trade Compliance

Business Partner will operate their business in compliance with all applicable trade-related laws, such as trade compliance, applicable import and export laws and laws and regulations relating to secondary boycotts.

## 2.8. Relationships with Suppliers, Vendors and Contractors

Business Partner will treat its suppliers, vendors and contractors (“Third Parties”) fairly and transparently at all times and in a manner conforming to all applicable laws.

Any Third Parties shall conduct themselves in an ethical and responsible manner that supports the protection of and respect for human dignity in their workplaces, consistent with the applicable laws and this Code.

### ***Business Partner will:***

- › Use reasonable efforts to promote Third Parties to conduct themselves in an ethical and responsible manner that supports the protection of and respect for human dignity in their workplaces, consistent with the applicable laws and this Code; and
- › Comply with the principles of non-discrimination with regard to the selection and treatment of Third Parties.

## 3. Workplace Commitments

### 3.1. Equal Opportunity and a Non-Discriminatory Working Environment

EQS is committed to the principles of equal employment opportunity and inclusion. We understand that diverse and highly productive employees are essential to our success and should be given opportunities to flourish in a barrier-free, non-discriminatory environment. EQS expects its Business Partners to be committed to the same principles.

**Business Partner will:**

- › Conduct business without regard to, and do not discriminate because of race, colour, religion, creed, gender, sexual orientation, gender identity, pregnancy, age, disability, national origin, ancestry; as well as citizenship, marital, veteran, family and medical leave status; or any other status protected by law;
- › Conduct all employment practices in a non-discriminatory manner, including activities relating to recruiting, hiring, benefits, leaves of absence, training, transfer, promotion, job assignments, compensation, corrective action and dismissal;
- › Make employment-related decisions based on company needs, job requirements and individual qualifications and provide fair remuneration and to guarantee the applicable national statutory minimum wage;
- › Comply with the maximum number of working hours laid down in the applicable laws;
- › Comply with laws regarding employment of immigrants and noncitizens and provide equal employment opportunity to everyone who is legally authorized to work in-country;
- › Respect the personal dignity, privacy and rights of each individual;
- › Prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative; and
- › Recognize, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organizations or trade unions.

### 3.2. Human Rights

EQS is opposed to child labour or the use of forced or compulsory labour. Unscrupulous labour practices such as these have been called, “modern-day slavery,” including deceiving workers over conditions of employment, charging employees unreasonable recruitment fees and confiscating or otherwise denying access to identity documents such as passports and travel passes. EQS prohibits these practices, and the Business Partner does the same.

Especially Business Partner shall not employ workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ workers under the age of 14.

### 3.3. Health and Safety of Employees

EQS expects its Business Partners to take responsibility for the health and safety of their employees.

**Business Partner will:**

- › Control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
- › Provide training and ensure that employees are educated in health and safety issues; and
- › Set up or use a reasonable occupational health & safety management system.

## 4. Engagement with Communities, Regulators and the Public

### 4.1. Environmental Protection and Sustainability

Business Partner is committed to protecting the environment and the health and safety of their communities and the public through full compliance with all applicable laws and international standards as well as continuous improvement of their performance.

When making significant business investments or acquisitions, Business Partner will take into account sustainability and other ethical considerations.

**Business Partner will:**

- › Minimize environmental pollution and make continuous improvements in environmental protection; and
- › Set up or use a reasonable environmental management system.

### 4.2. Lobbying

If engaging in lobbying communication with any member or employee of a legislative body or with any government official or employee in the formulation of legislation, Business Partner must make clear to such government official or employee that the Business Partner is speaking on its own behalf and must not create any perception to be speaking on behalf of, or is representing, EQS. Lobbying efforts by Business Partner on behalf of EQS are strictly prohibited.

### 4.3. Speaking on Behalf of or About EQS

Business Partner is not authorized to speak with regulators, the media, investors or industry analysts on behalf of EQS, unless authorized to do so by a member of senior management.

**Business Partner will:**

- › Only speak truthfully and accurately about EQS;
- › Issue written statements regarding EQS products and services in connection with Business Partner's activities only with prior authorization in writing by EQS; and
- › Not include any EQS confidential information in any statement of Business Partner, absent EQS's express, prior written consent, which may be withheld in EQS's sole discretion.

### 4.4. Independent Contractor

Business Partner is an independent contractor, whose relationship with EQS is established exclusively by the terms of the relevant contract between the parties. Business Partner is not, and may not describe itself as, agents, representatives, or employees of EQS. Under no circumstances may Business Partner suggest a relationship with EQS other than that as an independent contractor.

## 5. Reporting and Addressing Non-Compliance

### 5.1. Reporting

Business Partner is expected to immediately report any (potential) compliance violation or violation of this Code via EQS Integrity mailbox [integrity@eqs.com](mailto:integrity@eqs.com) or use EQS's whistleblowing application "EQS Ethics Line" at <https://eqs-ethics-line.com> that allows for anonymous reporting.

Whatever channel is used, EQS will ensure that the comments and concerns will be heard and addressed.

Reports will be handled as confidentially as possible. Reprisal, threats, retribution, or retaliation against any person who has in good faith reported a violation or a suspected violation of law, or against any person who is assisting in any investigation or process with respect to such a violation, is prohibited.

### 5.2. Addressing Non-Compliance

EQS will take appropriate action against any Business Partner whose actions are found to violate applicable law or this Code.

Actions may include immediate termination of the business relationship by EQS at our sole discretion. Where EQS has suffered a loss, we may pursue remedies against the individuals or entities responsible. Where laws have been violated, EQS as well as the Business Partner will cooperate fully with the appropriate authorities.

### 5.3. Continuous Modification

EQS is committed to continuously reviewing and updating our policies and procedures. Therefore, this Code is subject to modification. In the event of conflicts between this Code and future modifications, the latest modification will control.