

Supplier Code of Conduct / Verhaltenskodex für Geschäftspartner

freenet AG and its affiliated companies operate in accordance with applicable laws and legislation. In addition, respect for human rights and social standards is a key element of sustainable behaviour that is just as important as environmental protection for freenet.

Due to the prominent role of the supply chain for freenet GROUP's business model, we also make corresponding demands on our suppliers, service providers and other business partners.

This Supplier Code of Conduct describes the key aspects of the minimum standards for fulfilling our requirements in terms of cooperation with our business partners. Legal regulations take precedence over this Code of Conduct if higher standards are imposed. In all other respects, the Supplier Code of Conduct complements the existing obligations of our business partners.

Compliance and Integrity

Our business partners comply with international, national and local legislation at all times. Our business partners show zero tolerance towards corruption or bribery and comply with all applicable competition and antitrust legislation.

Conflicts of interest as well as situations giving the appearance of a potential conflict of interests must be avoided in business relations. Our business partners inform us proactively if such conflicts could arise in relation to the freenet Group.

Our partners dedicate top priority to data protection and data security. Therefore, they use appropriate technical and organisational measures to meet this requirement.

Our business partners handle business, financial and technical data as well as business correspondence with the strictest confidence. They do so with the diligence of a prudent business person.

Human Rights and Social Standards

Our business partners pay wages and additional benefits in accordance with applicable legislation, including regulations regarding minimum wages and in accordance with local industry and market standards.

Equal opportunities and fair treatment of the workforce must be ensured. Discrimination and verbal, physical or other harassment of employees will not be tolerated.

The employees of our business partners have the right to freedom of association and collective bargaining to the extent permitted by law.

Zero tolerance is shown towards forced or indentured labour including forced prison labour, forced labour of employees or human trafficking.

Our business partners comply with the minimum age for employing staff under national legislation and international agreements.

Security and Health

Our business partners strive for ongoing improvement in occupational health and safety. For this reason they implement a corresponding management system or will endeavour to do so in future.

Environmental Protection

Our business partners are committed to environmental protection and consume limited resources consciously and sparingly.

Supply Chain

Our business partners make reasonable efforts to promote compliance with the principles of this Supplier Code of Conduct with their own suppliers and subcontractors.

Whistleblower

We encourage our business partners and their employees to get in contact with our Compliance Department in case of doubts regarding the lawfulness of participants in our business relationship. Please share this information with your employees!

Whistleblower contact: **Compliance@freenet.AG**

Infringements

In the event of infringements of the Supplier Code of Conduct, freenet reserves the right to react in a manner that is proportional to the severity of the infringement. In particular this includes, but is not limited to, the request to eliminate the infringement with immediate effect, the assertion of claims for damages, or the termination of the agreement.



Please sign one of the following two statements, a) or b):

- a) We hereby confirm our compliance with this Supplier Code of Conduct.

Date, place

Stamp, name(s), signature(s)

- b) We hereby confirm that the internal guidelines regarding sustainable business that are adopted by the business partner correspond to or exceed the minimum requirements of this Supplier Code of Conduct.

Date, place

Stamp, name(s), signature(s)