

Supplier Code of Conduct

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Preamble

We, the Tele Columbus Group ([overview of companies](#)), are one of Germany's leading fibre-optic network operators and providers of multimedia services. With a reach of more than three million households, we provide a range of high-speed internet products – including telephone, TV and on-demand video services – through our PÿUR brand. Together with our housing industry partners, we offer tailored cooperation models and state-of-the-art digital services such as telemetry and tenant portals.

Our success is founded not only on the dedication and commitment of our employees, but also on the actions of our suppliers and business partners. The Tele Columbus Group is aware of its responsibility within the supply chain and places great value on respecting fundamental ethical principles throughout the value chain. This Supplier Code of Conduct lays out the minimum requirements. National legislation or other applicable guidelines are to be adhered to if they impose stricter standards on the same matters.

The Tele Columbus Group expects its suppliers and their subcontractors to abide by the following standards in their business activities so as to create a fair and sustainable working environment.

1. Adhering to laws and regulations

Our suppliers are required to adhere to all applicable national and international laws, regulations and provisions relevant to their business activities in connection with their collaboration with Tele Columbus. This includes complying with laws governing human rights, occupational health and safety and the environment, as well as anti-corruption standards. The main laws and regulations include:

- the principles of the United Nations (UN) Global Compact and the terms of the United Nations Universal Declaration of Human Rights, as well as the fundamental principles and rights of the International Labour Organization's Declaration on Fundamental Principles and Rights at Work;
- the Stockholm Convention on Persistent Organic Pollutants, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and the Minamata Convention on Mercury;
- the conventions of the United Nations and the Organisation for Economic Co-operation and Development (OECD) on the prevention of corruption and relevant anti-corruption laws.

2. Protecting human rights and workers' rights

We expect our suppliers to protect human rights, respect people's dignity, prevent discrimination and forced labour, and guarantee fair working conditions. This includes:

2.1 Prohibiting child labour

Complying with ILO Convention on the Minimum Age of Employment. People under the age of 18 are not permitted to work night shifts or overtime and must be protected from any work that is damaging to their health or poses a risk to their safety or development. Employment may not prevent young people from attending school.

2.2 Prohibiting forced labour, slavery and human trafficking

Rejection of any form of forced or compulsory labour, slavery or human trafficking. This includes the inappropriate treatment of employees as a result of sexual or physical harassment, cruelty, withholding identification documents or work permits, withholding deposits, or the use of other coercive measures. Employees must be able to terminate their employment relationship at their will in accordance with statutory notice periods. Suppliers will pay all statutory, public or other taxes, fees and duties incurred in relation to their employees.

2.3 Prohibiting discrimination and harassment

Creating a working environment free from discrimination and harassment. This includes sexual harassment, sexual abuse, physical punishment, physical or psychological coercion, and verbal abuse. No employee may be disadvantaged, favoured or harassed on account of personal characteristics such as gender, skin colour, ethnic or social background, language, religion or beliefs, political or other convictions, age, sexual orientation and identity, or other traits.

2.4 Occupational health and safety

Adhering to the ILO convention on creating a safe and healthy working environment through appropriate health and safety measures. Hazards and associated health risks must be adequately assessed, and the necessary protective measures implemented to prevent accidents and work-related illnesses in the best possible manner. Employees must be regularly instructed on general safety regulations in a form that they can understand. Suitable work equipment and protective gear must be provided, along with emergency planning and avoidance measures.

2.5 Freedom of association and right to collective bargaining

Respecting the rights of workers to freedom of association, to join representative bodies, to strike and to engage in collective bargaining in accordance with local laws and ILO conventions.

2.6 Fair pay and working hours

Adhering to national legislation with regard to working hours, pay, minimum wage and social benefits. If there are no national laws governing these matters, the international standards of the ILO apply.

2.7 Preservation of the natural foundations of human life

Preventing harmful soil degradation, water pollution, air pollution, dangerous noise pollution and excessive water consumption that are likely to significantly impact the basis required to preserve and produce food. Ensuring that people have access to clean water and sanitation facilities, and that their health and safety is not compromised.

Prohibiting the unlawful appropriation of land, forests and bodies of water, the use of which ensures the natural foundations of human life.

3. Protection of the environment

We expect our suppliers to be conscious of the environment and act responsibly. We expect our suppliers to take measures to reduce their impact on the environment. This includes using resources sparingly, reducing negative effects on the environment during the production and use of their products, and properly disposing of waste.

3.1 Responsible use of resources

We expect our suppliers to handle resources responsibly.

3.2 Meeting environmental obligations

Meeting environmental obligations with regard to the use of mercury and mercury compounds in products and manufacturing processes, as well as the treatment of mercury waste (Minimata Convention); the use and disposal of persistent organic pollutants, and the collection, storage and disposal of resulting waste (Stockholm Convention); or the transboundary movement of hazardous wastes (Basel Convention).

Taking suitable measures to reduce the CO₂ emissions of their own business activities and in the supply chain, in accordance with the targets defined in the United Nations' Paris Agreement.

3.3 Transparency regarding greenhouse gas emissions

Support in identifying greenhouse gas emissions within the supplier's own operations, as well as upstream production stages.

4. Integrity in business conduct

We expect our suppliers to conduct their business ethically in accordance with relevant local, national and international laws and guidelines. Our reputation is extremely valuable to us, which is why we want to work with business partners of good standing.

4.1 Prohibiting bribery and corruption

Prohibiting any form of corruption, bribery, fraud, embezzlement or extortion, among other things. Any unfair advantage granted to an individual, a company or a public official with the aim of influencing a decision must be strictly prohibited. This includes giving, offering or promising gifts, or accepting, being offered or being promised such gifts – including through third parties. Illegal benefits such as (kickback) payments, incentives or other advantages, as well as bribes and similar payments, must not be used in relation to any business relationship with the Tele Columbus Group.

Invitations or gifts may also not be used to influence decisions. This applies both to invitations of our employees by suppliers and the invitation of third parties by suppliers.

4.2 Conflicts of interest

Conflicts of interest must be disclosed to Tele Columbus and resolved. Conflicts of interest can be reported using our whistleblower channel (see chapter 5.3).

4.3 Fair competition

Adhering to laws governing fair competition, advertising and business practices. No involvement in agreements violating antitrust law, no misuse of market power and no involvement in other anti-competitive business practices. This also includes complying with all applicable import and export provisions, economic sanctions and embargoes.

4.4 Confidentiality and data protection

Adhering to all applicable laws and provisions governing data protection and information security. Personal data of employees, customers and business partners is only processed within the scope of legal requirements. Any collection, storage, processing, transmission or transfer of personal data must take place in strict adherence with applicable laws, regulations and official orders governing data protection and information security. IT systems must be suitably protected against unauthorised access, cyberattacks and the like. Conventional standards must be abided by.

5. Cooperation

We value open and constructive partnerships with our suppliers. We encourage them to continuously improve their performance and offer innovative solutions.

5.1 Implementing requirements

We expect our suppliers to identify the risks posed to their own business operations and their supply chain and to take suitable remedial measures. The supplier is under obligation to communicate the content of this code to its own employees, authorised representatives and subcontractors and to take all necessary precautions to implement the requirements. In the event of a suspected breach of this Supplier Code of Conduct, and to mitigate against supply chains subject to increased risks, suppliers will notify the Tele Columbus Group swiftly and, if necessary, regularly on the identified breaches and risks as well as the measures taken.

The Tele Columbus Group reserves the right to introduce measures such as self-assessment questionnaires or audits depending on the supplier's risk exposure. Suppliers will support the measures taken by the Tele Columbus Group to assess and mitigate risks.

5.2 Consequences of non-compliance

In the event of a breach of any rules, we expect suppliers to notify us immediately and explain the causes of the breach and the measures to be taken. If suppliers do not show any willingness to rectify the breaches and take corresponding measures within an appropriate period of time, the Tele Columbus Group reserves the right – depending on the severity of the breach – to suspend the business relationship, refuse to take receipt of deliveries in connection with orders and/or return goods to suppliers until evidence is provided that the breaches have been rectified.

In particularly serious cases, the Tele Columbus Group is also entitled to terminate individual or all contractual relationships with a supplier without notice. This does not affect the Tele Columbus Group's further statutory and/or contractual rights.

5.3 Reporting potential misconduct

Suppliers, their employees or other parties may report suspected violations of this Supplier Code of Conduct in the context of a supplier relationship and submit information using the Tele Columbus Group's whistleblower channel. The whistleblower channel can be accessed via the following link:

<https://www.telecolumbus.com/en/company/corporate-governance/reporting-system/>

All submitted information is treated confidentially and, if desired, anonymously. Suppliers must pass on the information about the whistleblower channel to their employees and subcontractors. Alternatively, suppliers can set up their own complaints mechanism.

Berlin, March 2025

Markus Oswald
CEO

Christian Biechteler
CSO HI&I

Jochen Busch
CCO

Nicolai Oswald
CFO

Declaration of agreement

By signing this document, the supplier agrees to act responsibly and to comply with the requirements and standards listed. The supplier is obliged to communicate the content of this Supplier Code of Conduct to its employees, agents and subcontractors in a manner that is understandable to them and to take all necessary precautions to implement these requirements. Furthermore, the supplier agrees to support Tele Columbus Group by participating in risk-orientated questionnaires and, if necessary, audits at its production sites. Audits will be conducted to verify compliance with the Supplier Code of Conduct during normal business hours and with reasonable advance notice.

Location, date, signature of the supplier and company stamp