

Code of Conduct for Suppliers and Business Partners

November 2022

For the sake of better legibility, masculine pronouns shall be used throughout the following when referring to persons. All statements apply equally to all genders.

Foreword by the Management Board

secunet Group (secunet) wants to live up to its responsibility to its employees, customers, business partners and society. We thus commit ourselves as well as our suppliers and business partners to clear principles of conduct as it concerns sustainable, entrepreneurial action. The Code of Conduct for Suppliers and Business Partners contains clear guidelines that enable us to work together responsibly, ethically and with integrity in accordance with legal regulations.

The Code of Conduct for Suppliers and Business Partners helps to promote our principles of conduct along the entire value chain. To ensure this, we expect that our suppliers and business partners will also comply with the following standards and legal requirements and work towards their fulfilment throughout the supply chain.

We strongly reject any form of modern slavery, human trafficking, corruption and bribery. In addition, we base our actions on the principles of the UN Global Compact, the Supply Chain Act (LkSG) and the requirements of the International Labour Organisation (ILO).

Essen, 15.11.2022

The Management Board

Compliance with social standards



Human rights and equal treatment

The suppliers and business partners of secunet Group respect and protect the globally applicable regulations for the protection of human rights as fundamental and universal principles. We reject any form of child labour and expect the same from our suppliers and business partners.

Prohibition of discrimination

Suppliers and business partners of secunet Group do not discriminate against anyone on the grounds of race, skin colour, nationality, origin, religion, ideology, gender, language, age, sexual identity, physical constitution or appearance. As part of this, no one should be treated differently, harassed or excluded on the above grounds. Our suppliers and business partners do not tolerate any form of discrimination or harassment.

Freedom of association

Suppliers and business partners must recognise and respect the right of workers to freedom of association, freedom of organisation and collective bargaining, in compliance with local legal requirements. It must be ensured that workers can openly discuss working conditions with the respective company management without fear of reprisals.

Working hours and remuneration

Suppliers and business partners shall ensure compliance with national laws and regulations or industry standards regarding working hours, break times and holiday. Suppliers and business partners shall ensure fair remuneration that is at least in line with the respective applicable national laws.

Occupational health and safety

The suppliers and business partners adhere to the applicable legal requirements for health and safety at work. They actively support the further development and improvement of working conditions.

Responsibility for the environment



Suppliers and business partners actively contribute to the conservation of natural resources and the protection of the environment. They comply with legal requirements and are committed to the sustainable protection of the environment.

Resources, waste and emissions

Suppliers and business partners use natural resources sparingly. Waste of any kind and all emissions into the air, water or soil shall be minimised, classified and monitored.

Hazardous substances

Suppliers and business partners of secunet Group shall minimise the use of hazardous substances and ensure that all hazardous substances are transported, stored and disposed of safely. Suppliers and business partners shall inform their employees of relevant safety procedures.

Conflict minerals

Suppliers and business partners comply with all applicable legal regulations on conflict minerals (e.g. tin, tungsten, tantalum, their ores and gold). Suppliers and business partners should verify whether their own activities or those of their supply chains are located in or sourced from conflict-affected or other high-risk areas and, in such cases, adapt enhanced due diligence measures to the specific context.

Transparent and sustainable business relationships



Dealing with stakeholders

Suppliers and business partners shall maintain a trust-based, fair, correct and reliable relationship with their customers, suppliers and other stakeholders.

Fight against corruption

Suppliers and business partners undertake to fight any form of corruption in connection with their business activities and to comply with the corresponding applicable laws and standards.

They do not offer services, gifts or benefits to secunet employees or the Management Board in order to influence secunet employees or the Management Board in a decision.

Avoidance of conflicts of interest

Suppliers and business partners make business decisions solely in the interest of their company and are not influenced by personal and their own financial interests. They are also obliged to report situations that give rise to the appearance of conflicts of interest to secunet.

Combating money laundering and the financing of terrorism

Suppliers and business partners shall comply with applicable laws combating money laundering and the financing of terrorism and shall not directly or indirectly engage in money laundering or activities financing terrorism.

Proper accounting and financial reporting

Suppliers and business partners shall always comply with the principles of proper accounting and financial reporting.

Fair market conduct



Compliance with antitrust and competition law

Suppliers and business partners shall comply with all applicable national and international rules of antitrust law and take appropriate and necessary preventive measures.

All forms of formal and informal agreements which aim at or actually have the effect of unduly hindering competition are prohibited. This also applies to tacit, deliberately agreed unlawful agreements and conduct.

Import and export regulations

As is pertinent to worldwide business activities, secunet's suppliers and business partners shall ensure compliance with the respective applicable laws and regulations for the import and export of goods, services and information, including compliance with sanctions, embargoes, regulations, government orders and guidelines.

Protection of information and corporate property



Intellectual property protection and information security

Suppliers and business partners must respect intellectual property rights and protect confidential information. The transfer of technology and know-how must be done in a way that respects intellectual property rights.

Suppliers and business partners protect the information made available to them by secunet with appropriate state-of-the-art measures relevant to the respective protection requirements of the information.

Data processed in IT systems must be protected in the best possible way, but at least in accordance with the law.

Data protection

Suppliers and business partners shall comply with all applicable laws, guidelines and regulations concerning data protection and data security. Appropriate measures shall be taken to ensure compliance with the applicable requirements and laws, in particular with regard to the handling of personal data.

Implementation and reporting channels



Care in the supply chain

secunet also expects its suppliers, in particular, to pass the expectations and contents of the Code of Conduct for Suppliers and Business Partners on along their supply chain, to commit their suppliers and business partners to it accordingly and to ensure compliance with this Code. In addition, we encourage our suppliers to take the necessary steps to identify and consider risks along their supply chain and to inform secunet appropriately.

Suppliers and business partners should have appropriate management systems and control mechanisms in place to ensure compliance with the secunet Code of Conduct for Suppliers and Business Partners or equivalent standards. The functioning and quality of the management system should be proportionate to the size, complexity and risk environment of the suppliers and business partners.

Right to information and right to audit

Suppliers and business partners shall provide information on compliance with this Code of Conduct to secunet upon request. In addition, secunet reserves the right to verify the accuracy of the information and the compliance of the contracting partner's actions with this Code of Conduct on site at the supplier and business partner premises or to have them verified by third parties after prior notification.



Legal consequences / termination

Should a supplier or business partner discover that this Code of Conduct is not being complied with, he must inform secunet immediately. In the event of a breach of the principles of this Code of Conduct by a supplier or business partner, the supplier or business partner shall immediately take appropriate remedial action and implement measures to bring the breach to a definitive end. If a supplier or business partner violates the aforementioned duty to inform and remedy, secunet shall be entitled to decide anew on the commencement or continuation of the business relationship and, as ultima ratio, to terminate contracts with the supplier or business partner immediately.

Whistleblowing system and reporting channels

Information concerning violations of the secunet Code of Conduct for Suppliers and Business Partners, in particular on illegal business practices or potential human rights violations, can be submitted at any time via the secunet whistleblower system. The system is available in German and English and enables anonymous, confidential and secure communication with the Compliance Officer at secunet. secunet consistently follows up on every indication of misconduct, taking into account the principle of proportionality and confidentiality. Every single (serious) tip is examined. Depending on the result of the investigation, a transparent decision is made as to which consequences are suitable, necessary and appropriate.

The whistleblower system and the Compliance Office can be reached in the following ways:

Compliance Officer

Stephanie Ventz
compliance@secunet.com
T +49 201 5454-1224

secunet Security Networks AG

Compliance Office
Kurfürstenstraße 58 · 45138 Essen · Germany

BKMS Whistleblowing System

<https://www.secunet.com/en/about-us/company>

Confirmation of the Code of Conduct for Suppliers and Business Partners of secunet Group

As a supplier or business partner of secunet Group, we act in accordance with the ethical and legal principles contained in this Code of Conduct for Suppliers and Business Partners, insofar as they apply to the respective business activity.

Beyond this, we also pass on these requirements along our supply chain.

We hereby acknowledge the Code of Conduct for Suppliers and Business Partners of secunet Group or confirm that we comply with the above principles and requirements by applying our own equivalent Code of Conduct within our company.

Date/ signature and stamp (supplier or business partner)

secunet – protecting digital infrastructures

secunet is Germany's leading cybersecurity company. In an increasingly connected world, the company's combination of products and consulting assures resilient digital infrastructures and the utmost protection for data, applications and digital identities. secunet specialises in areas with unique security requirements – such as cloud, IIoT, eGovernment and eHealth. With security solutions from secunet, companies can maintain the highest security standards in digitisation projects and advance their digital transformation.

secunet is an IT security partner to the Federal Republic of Germany and a partner of the German Alliance for Cyber Security.

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