

Code of Conduct for Pan Dacom Direkt GmbH Suppliers

This Code of Conduct defines the basic requirements placed on Pan Dacom Direkt GmbH suppliers of goods and services concerning their responsibilities for human and the environment. Pan Dacom Direkt GmbH reserves the right to reasonably change the requirements of this Code of Conduct due to changes of the Pan Dacom Direkt GmbH compliance program. In such event Pan Dacom Direkt GmbH expects the supplier to accept such reasonable changes.

The supplier declares herewith:

- **Legal compliance**
 - to comply with the laws of the applicable legal system(s).
- **Prohibition of corruption and bribery**
 - to tolerate no form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official in violation of law for the purpose of influencing decision making.
- **Conflict of interests**
 - to avoid conflict of interests, i.e. when private interests of employees, in particular of executives, conflict with the duties in the company.
- **Fraud**
 - to prohibit any form of fraud;
- **Money laundering**
 - to take measures to prevent money laundering;
- **Anti-competitive practices/Cartel law**
 - to comply with all applicable anti-competitive regulations, in particular with the hardcore restriction of Art. 4 of the commission regulation (EU) No 330/2010;
- **Responsible marketing**
 - to do marketing in a responsible way, in particular to avoid inappropriate advertising with wrong facts or to make presents to someone only in appropriate dimension and not in anticipation of any return service or other preferences and not to breach any applicable laws (in particular anti-corruption laws);
- **Data protection**
 - to comply with the applicable data protection laws and therefore in particular protect the personal data of customers, employees and business partners;
- **Respect for the basic human rights of employees**
 - to promote equal opportunities for and treatment of its employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;
 - to respect the personal dignity, privacy and rights of each individual;
 - to refuse to employ or make anyone work against his will;
 - to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
 - to prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
 - to provide fair remuneration and to guarantee the applicable national statutory minimum wage;
 - to comply with the maximum number of working hours laid down in the applicable laws;
 - to recognize, as far as legally possible, the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions.

- **Prohibition of child labor**
 - to employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.
- **Health and safety of employees**
 - to take responsibility for the health and safety of its employees;
 - to control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
 - to provide training and ensure that employees are educated in health and safety issues;
 - to set up or use a reasonable occupational health & safety management system.
- **Environmental protection**
 - to act in accordance with the applicable statutory and international standards regarding environmental protection;
 - to minimize environmental pollution and make continuous improvements in environmental protection;
- **Supply chain**
 - to use reasonable efforts to promote among its suppliers compliance with this Code of Conduct;
 - to comply with the principles of non-discrimination with regard to supplier selection and treatment.