



Code of Conduct
for business partners of United Internet AG

(Supplier Code of Conduct)

Status: November 2023



Table of contents

- PRELIMINARY NOTE 2**
- REQUIREMENTS FOR UNITED INTERNET'S BUSINESS PARTNERS..... 3**
 - 1. ETHICAL BUSINESS BEHAVIOUR AND COMPLIANCE 3
 - 1.1 *Compliance* 3
 - 1.2 *Integrity in business transactions*..... 3
 - 1.3 *Fair competition* 3
 - 1.4 *Information security and data protection* 3
 - 1.5 *Intellectual property*..... 3
 - 2. SOCIAL AND ENVIRONMENTAL DUE DILIGENCE 4
 - 2.1 *Human rights and working conditions* 4
 - 3. ENVIRONMENTAL AND CLIMATE PROTECTION 6
 - 4. IMPLEMENTATION OF THE DUE DILIGENCE OBLIGATIONS..... 7
 - 4.1 *Compliance with the Supplier Code of Conduct*..... 7
 - 4.2 *Whistleblowing system*..... 7

PRELIMINARY NOTE

Within our business relationships, it is our aim to act as a reliable and trustworthy partner and to fulfil our corporate due diligence.

The United Internet Group (United Internet for short) is committed to ecologically and socially responsible corporate governance. As our business partner, we expect you to fulfil the same sustainability standards by which we measure ourselves.

This Supplier Code of Conduct takes into account established principles of sustainability, which are also expressed in UNITED INTERNET's guidelines, and concretises the guiding principles for UNITED INTERNET's business partners set out in the "Declaration of Principles on Human Rights". It defines the minimum requirements that you as a supplier of UNITED INTERNET must observe, as well as our clear expectations. We expect you, as our business partner, to address these appropriately towards your partners. Compliance with the minimum requirements formulated in this standard is stipulated as binding in UNITED INTERNET's General Terms and Conditions of Purchase.

In the event of a conflict between provisions formulated for this purpose and contractual agreements between a supplier and UNITED INTERNET or the General Terms and Conditions of Purchase of UNITED INTERNET, the contractual agreements or the General Terms and Conditions of Purchase shall prevail.

Working in partnership with our business partners is of the utmost importance to us. We are certain that we can only improve our sustainability performance through continuous supplier development and consistent supplier management. Your co-operation as a business partner is crucial to our success and forms the basis of our business relationship.

REQUIREMENTS FOR UNITED INTERNET'S BUSINESS PARTNERS

1. ETHICAL BUSINESS BEHAVIOUR AND COMPLIANCE

1.1 Compliance

The business partner of UNITED INTERNET must comply with all relevant laws and regulations. It shall take appropriate measures to ensure compliance with the statutory provisions and the internal company guidelines of United Internet - insofar as known - and work towards their observance.

1.2 Integrity in business transactions

The highest standards of integrity must be applied to all business activities. The business partner is obliged to pursue a zero-tolerance policy with regard to the prohibition of all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be implemented to ensure compliance with anti-corruption laws.

1.3 Fair competition

The business partner behaves fairly in competition and complies with all applicable competition and antitrust laws.

1.4 Information security and data protection

The protection of information is one of United Internet's most important values. We understand "information" to mean all data and content held by the company. This includes electronically stored information as well as information in paper form or as spoken word. Business partners must protect the confidentiality, availability and integrity of all information transmitted by us, in particular sensitive company data and personal data, and ensure this through suitable technical and organizational measures.

1.5 Intellectual property

Intellectual property rights must be respected; technology and expertise must be transferred in such a way that intellectual property rights and customer information are protected.

2. SOCIAL AND ENVIRONMENTAL DUE DILIGENCE

2.1 Human rights and working conditions

Respect for human rights is an integral part of United Internet's corporate culture. United Internet is guided by the United Nations Guiding Principles on Business and Human Rights. In order to counter adverse human rights impacts, it is necessary to take appropriate measures to prevent, mitigate and, if necessary, redress them. United Internet also expects this from its business partners and their suppliers.

2.1.1 Reasonable wages, working hours and freedom of association

The business partner shall pay its employees an appropriate wage as set out in Art. 7 a) (ii) of the United Nations International Covenant on Economic, Social and Cultural Rights. This means that wages and social benefits must comply with the respective national laws and, where binding, industry standards. In particular, business partners based in Germany or business partners who are subject to German law or whose services are governed by German law must comply with this.

The business partner is obliged to comply with the statutory and, where applicable, collectively agreed regulations on maximum working hours. Overtime is only permitted if it is worked on a voluntary basis and if it does not exceed the statutory limits and internationally recognised standards, for example the International Labour Organisation Convention (ILO Convention).

The business partner is obliged, in accordance with the third principle of the UN Global Compact, to respect the freedom of association and the right to form interest groups to represent common purposes and goals. In cases where these rights are restricted by law, other alternative means of independent association of workers for the purpose of collective bargaining should be permitted.

2.1.2 Forced labour and modern slavery

The business partner may not have any forced, prison, slave or compulsory labour performed. Forced, prison, slave or compulsory labour may include, for example, the restriction of people's freedom of movement or the withholding of identity documents and wages

2.1.3 No child labour

The business partner may not employ children who are below the minimum age specified by the ILO or by national law. The minimum age for employees is the applicable minimum age under the national law of the supplier location or the age at which compulsory schooling ends in that country, whichever is higher.

2.1.4 Prohibition of discrimination

The business partner must create a working environment free from psychological, physical, sexual or verbal abuse, intimidation, threats or harassment. In its personnel decisions, the business partner must commit to

equal opportunities. Discrimination on the basis of nationality and origin, ethnic or political affiliation, gender, religion or ideology, disability, age or sexual identity is prohibited.

2.1.5 Health protection and occupational safety

The business partner must ensure a safe and healthy working environment in order to prevent accidents and illnesses. This includes the identification of potential hazards and stresses, combined with adequate protective measures. The business partner must implement the applicable legal requirements for occupational health and safety as intended and also comply with internationally recognised standards, for example the ISO 45001 standards or the ILO conventions.

The business partner must observe the prohibition of harassment, abuse and punishment with any form of violence at work, including with regard to the commissioning or use of private or public security forces.

2.1.6 Conflict minerals and conflict metals

The business partner establishes processes for conflict minerals and conflict metals in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

2.1.7 Land expropriation

The business partner must refrain from any unlawful eviction and illegal expropriation of land, forests or bodies of water. Furthermore, suppliers must ensure that there are no legally unauthorised forced evictions.

3. ENVIRONMENTAL AND CLIMATE PROTECTION

The business partner undertakes to comply with all applicable environmental laws and to implement the internationally recognised standards of operational environmental protection as intended, such as ISO 14001. Business partners whose activities have a significant impact on the environment should have an effective environmental management system in place that contributes to the protection of the environment and reduces the negative impact of products and services on the environment.

The business partner of United Internet must comply with all relevant laws, regulations and ordinances on hazardous substances, e.g. RoHS (Restriction of Hazardous Substances), REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) or ELV (End-of-Life Vehicle) and provide evidence of this if necessary. The business partner is subject in particular to the ban on the production and use of persistent organic pollutants under the Stockholm Convention, the ban on the import and export of hazardous waste under the Basel Convention and the ban on the use of mercury and mercury compounds in product manufacture, including the proper handling of mercury waste, under the Minamata Convention.

We recommend that our business partners formulate and implement their own reduction targets for CO₂ emissions, e.g. by sourcing the majority of their electricity from renewable energy sources.

4. IMPLEMENTATION OF THE DUE DILIGENCE OBLIGATIONS

4.1 Compliance with the Supplier Code of Conduct

United Internet expects its business partners to comply with the principles of this document and to pass them on to the suppliers and business partners in their supply chain, to commit them accordingly and to ensure compliance with these principles and to agree to a possible review of compliance with these principles. The supply chain basically refers to all products and services of a company and thus to all steps in Germany and abroad that are necessary to manufacture the products and provide the services.

4.2 Whistleblowing system

For reporting potential violations of the above-mentioned requirements, United Internet has set up the „Integrity Line“, which can be reached at the following address:

<https://unitedinternet.integrityline.com/frontpage>

With "Report misconduct in the supply chain", we have established a dedicated reporting tile for violations in the supply chain. The business partner informs its employees about the possible use of the publicly available "United Internet Integrity Line". Further information on handling complaints can be found in the [Rules of Procedure for Reporting Misconduct in the Supply Chain](#).