



# Code of Conduct

Claranet's principles of behavior

**claranet**<sup>®</sup>

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# Foreword

## Dear customers and partners,

Responsible and lawful behaviour is just as fundamental to Claranet's success as our innovative strength. The reputation that we have established with our customers, business partners and the public, earned with a great deal of commitment, can be damaged by a single legal violation alone. Economic success and corporate responsibility are inseparable, making compliance with the law when conducting our business, a matter of course for us.

The Code of Conduct expresses Claranet's corporate values and the standards it sets for itself and others in the areas of health and safety, environment, labour, human rights and compliance.

Claranet's mission is to provide customers with comprehensive support for their modernisation. Our claim "Make modern happen" stands not only for technological excellence, but also for our commitment to integrity and transparency. Acting responsibly is a key element in building trust when working with our customers. This includes complying with applicable law in every aspect of our business activities to ensure legal certainty.

Claranet recognises that it has a special responsibility towards the environment, its employees and society. Sustainability is the basis of our business activities. Therefore, respecting and strengthening human rights, environmental standards and business ethics in our company as well as a compliant the supply and value chain an essential part of our corporate ethos. We endeavour to be transparent regarding potential risks and take action where the defined principles are violated.

These principles of conduct are the binding benchmark for the actions of all Claranet employees and business partners.

# 1. Claranet culture - agile and customer-centric

We practice an agile and customer-centric culture. Together, we look for ways to continuously develop our company and place the customer at the centre of our activities. Trust and respect are just as crucial to this as the willingness to share knowledge, encourage an open error culture and a strong sense of personal responsibility among employees. The framework conditions include a flat organisational structure, lean processes and autonomous cross-departmental project teams. These enable short planning and implementation cycles, fast decision-making processes and continuous feedback. Our agile culture enables us to recognise changes quickly, respond rapidly to changing and unexpected market requirements and constantly improve the service we provide to our customers. In addition, regular surveys are conducted among employees, and an active suggestion scheme is promoted to improve the organisation.

# 2. Compliance with laws and recognition of international standards

Claranet is committed to responsible corporate governance based on internationally recognised standards, particularly within the framework of the United Nations (UN) Universal Declaration of Human Rights, the ten principles of the UN Global Compact, the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD) and the labour and social standards of the International Labour Organisation (ILO).

# 3. Fair and social working conditions

Claranet does not participate in or use forced labour, slave labour, bonded labour or human trafficking. At the sites, working hours, wages and payment of overtime are regulated in accordance with all relevant laws.

Every person has the right to a fair, dignified and respectful treatment. At Claranet, we are committed to equal opportunities, diversity and inclusion and to a working environment characterised by respect and tolerance. Sexual harassment, discrimination, racism, bullying, abuse of power, intimidation or threats and other forms of harassment are not tolerated. We want to live in a society in which diversity is lived and experienced positively by everyone and in which all people are equally represented. We therefore value a team that unites a variety of identities, backgrounds and perspectives.

Our employees are selected, recruited, remunerated and promoted based on their qualifications and skills. We also ensure that our employees live and share our attitude and values. Each of our employees is obliged to refrain from any discrimination or harassment and to contribute to a respectful and cooperative working environment. Any reports of violations of the aforementioned principles are investigated and systematically dealt with.

These standards not only bind Claranet but are also applied when selecting our suppliers. Furthermore, respectful and impartial behaviour is important to us, not only internally, but also with all our business partners and the public.

## 4. Flexibility and support in professional life

At Claranet, we stand for a flexible working culture that considers the different phases and models of the lives of our employees. We offer flexible working hours, part-time work and sabbaticals to ensure a good work-life balance. We support employees returning to work after taking time off through targeted programmes. Further, we promote continuous professional development and well-being in the workplace through a comprehensive health management programme. Managers play a key role in promoting and exemplifying this flexibility and are required to actively support solutions for the individual needs of their teams. Our aim is to create a working environment in which employees can achieve their professional goals and fulfil their personal obligations at the same time.

## 5. Leadership culture and collaboration

Every manager is responsible for their employees. The relationship between them is based on mutual respect. Managers and employees keep each other informed so that they can act and make decisions efficiently and successfully. We trust our employees, encourage their independence, give them room to manoeuvre and delegate responsibility. We promote self-motivation through dialogue and clear, challenging and realistic goals. The company management works with the employee representative body in an open and trusting manner, engages in constructive and cooperative dialogue and strives for a fair balance of interests.

## 6. Further education

Claranet promotes a culture of continuous learning and development that encompasses all levels of the company. Our comprehensive training concept aims to develop our employees' professional competences and personal skills. With a wide range of training courses, we enable our teams to continuously develop their skills and gain new qualifications.

We attach great importance to keeping our employees up to date with the latest technology and actively support them in obtaining relevant certificates. Measures to strengthen team spirit are also an integral part of our corporate philosophy. In addition, we offer special programmes to promote our managers and systematically develop their leadership skills.

Our educational concept begins with our trainees, who are prepared for their future tasks through targeted support and certification courses. It is very important to us that our employees proactively contribute and fulfil their own expectations of their professional performance.



## **7. Compliance with the Foreign Trade and Payments Act and prevention of money laundering and terrorist financing**

Our business practices are structured in such a way that they comply with foreign trade regulations and comparable national and international laws. We take appropriate measures to ensure that transactions with third parties do not violate applicable economic embargoes or regulations on trade, import and export controls or on combating the financing of terrorism.

Claranet ensures that it does not directly or indirectly promote money laundering or terrorist financing in any way. In doing so, we comply with the applicable national and international legal obligations to prevent money laundering.

## **8. Avoidance of conflicts of interest and corruption**

We stand for fair competition and strictly reject bribery and all forms of corrupt behaviour that could harm our company. Our established compliance structure ensures that our employees know exactly how to act correctly in uncertain situations. They can also consult with the Compliance Officer and seek his or her advice at any time if they are unsure. Our employees are strictly prohibited from exploiting business relationships in an illegal manner for their own benefit, for the benefit of third parties or to the detriment of Claranet. This particularly excludes the acceptance or granting of unauthorised personal benefits that could unduly influence decisions in business transactions.

## **9. Financial integrity**

We conduct business and financial reporting properly and transparently. We document all business transactions, assets and liabilities in accordance with legal requirements. The proper documentation and retention of records is carried out with the utmost accuracy, completeness and a great sense of responsibility. We regularly have this confirmed by independent auditing companies.

## **10. Data protection and information security**

For Claranet, the protection of confidential and personal data is one of its core competences and is demanded by customers without limitation. Since 2011, Claranet has aligned its services and operating processes with the ISO/IEC 27001 standard for information security and has been officially certified. We collect, process and use personal data only to the extent necessary for specified, explicit and legitimate purposes. We ensure that the use of data is transparent for those

affected and that their right to information and correction and, if necessary, to objection, blocking and deletion is safeguarded. Each of our employees is obliged to comply with the provisions of data protection law and the statutory and company regulations on information security and to protect the personal and confidential data entrusted to Claranet from misuse. All components of information processing are secured in such a way that the confidentiality, integrity, availability, verifiability and data protection of the information worthy of protection are guaranteed and unauthorised internal and external use is prevented. Employees are obliged to keep confidential any business and trade secrets which are entrusted to them in the course of their work at Claranet or which otherwise become known to them.

## 11. Digital ethics

Claranet is committed to using technology ethically and responsibly. As a managed service provider, we have a special responsibility to protect our customer's privacy and to handle our customers' personal and proprietary data responsibly. We ensure that the technologies we use are utilised fairly and equitably. Innovations that we use, or support should have a positive impact on society and reflect our ethical principles. We also attach great importance to digital sustainability by considering the environmental and social impact of new technologies and promoting sustainable solutions. Claranet strives to create a trustworthy and secure digital environment characterised by ethical business practices.

## 12. Occupational safety and health protection

We fulfil our responsibility for the health and safety of our employees and create a healthy and hazard-free working environment. Claranet adheres to the safety guidelines and guarantees occupational safety and health protection within the framework of the applicable national regulations. With forward-looking occupational safety and health protection management, potential hazards and weak points are identified at an early stage and remedied with suitable measures. Appropriate processes, procedures and methods have been implemented and are continuously developed to ensure a strong focus on the health, performance and job satisfaction of employees. Each of our employees is involved in promoting their health and complies with occupational health and safety regulations.

## 13. Protection of the environment and ecological sustainability

We take responsibility for continuously improving the environmental compatibility of our products and services. Claranet promotes climate protection in its day-to-day work, e.g. by implementing guidelines for employees to save electricity. By switching its entire energy supply to green electricity

from hydropower, Claranet has been making an important contribution to climate protection for many years. Each of our employees must use natural resources appropriately and sparingly and ensure that their activities have the least possible impact on the environment. This supports employees in using resources sparingly in their everyday lives outside of work. We are also actively promoting electromobility by redesigning our vehicle fleet. A significant proportion of Claranet's vehicle fleet consists of purely electric vehicles, which represent a clean and efficient alternative to conventional combustion engines. The sustainability system at Claranet is also part of a comprehensive Integrated Management System (IMS) that was introduced a long time ago, with further certifications in the areas of sustainability and environmental protection.

Our corporate policy is consistently orientated towards current regulatory standards, including the Supply Chain Act. We have integrated the principles of this law into our sustainability management system to be a reliable service partner for both our customers and business partners, proactively helping to ensure responsible supply chains.

## **14. Working with business partners and third parties**

We are convinced that free competition is a central pillar of our economy. Compliance with laws and regulations is an essential principle of our business activities. We also expect this and the minimum standards we have imposed on ourselves from our business partners. We are committed to fair dealings with our business partners and third parties and support fair competition in compliance with competition and antitrust law. We reject price fixing or prohibited coordination of market behaviour between competitors. Fair behaviour and a rapid flow of information help us to build close and trusting relationships with customers and business partners.

## **15. Whistleblowing mechanisms**

Claranet encourages all employees to report concerns or violations of the Code of Conduct. To this end, Claranet offers clear and secure mechanisms. Employees should first report violations to an ombudsperson via a whistleblowing system developed in-house. If they feel uncomfortable doing so, an anonymous reporting channel is available to ensure the confidentiality and protection of the person making the report.

All employees who report violations in good faith are protected from any retaliation. Claranet is committed to investigating all incoming reports thoroughly and confidentially and taking appropriate action. Our goal is to promote a transparent and safe work environment in which ethical behaviour is supported and encouraged.



## 16. Final provisions

The Code of Conduct is subject to technical and organisational progress and further development. Claranet will independently implement further appropriate measures and document them in further versions of this Code of Conduct.

In addition, regular training and sensitisation measures on the Code of Conduct are held for all Claranet employees.