



Supplier Code of Conduct of the Logicalis GmbH ("SCOC")

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1 Introduction

Logicalis GmbH (hereinafter "Logicalis") is part of the Datatec Group, an international ICT solutions and services group in more than 50 countries in North America, Latin America, Europe, Africa, the Middle East and Asia-Pacific. The Datatec Group acts as an industry intermediary in the ICT supply chain, offering the market a wide range of advanced technology solutions and professional services for the implementation and maintenance of secure, complex IT networks, unified collaboration, cloud and data centre infrastructures.

Honesty and integrity are at the centre of Logicalis' actions; it complies with all laws applicable to the company and supports the guiding principles of the UN Global Compact on human rights, labour, the environment and anti-corruption. These principles, in accordance with national laws and practices, also apply to all our business partners. We therefore only do business with suppliers who are committed to complying with our Supplier Code of Conduct or who themselves committed to their own Code of Conduct, which is comparable in key respects. The SCOC applies to all natural or legal persons (hereinafter referred to as "suppliers") who supply goods, services etc. themselves or via third parties for Logicalis. By signing this, Logicalis' suppliers undertake to comply with the ethical and legal principles set out therein and to commit the suppliers in their supply chain. If the statutory provisions are more restrictive than the provisions of this SCOC, these shall take precedence. A violation of the principles and requirements of this SCOC is a material breach of contract by the supplier and entitles Logicalis to immediately terminate the supplier relationship in whole or in part. In this respect, the relevant provisions of this SCOC shall take precedence over the other contractual provisions between the supplier and Logicalis.

The principles described in this SCOC represent a minimum standard. This SCOC contains requirements for the following areas:

- Business integrity and ethics
- Dealing with customers, suppliers, distributors and employees
- Occupational safety
- Sustainability
- Compliance and complaints procedure
- Continuous improvement

2 Business integrity and ethics

Logicalis is committed to upholding and maintaining the highest standards of ethics and business integrity. Suppliers not to engage directly or indirectly in money laundering activities and to comply with all applicable anti-corruption and anti-money laundering laws and regulations of the countries in which they operate. Logicalis employees may not be offered gifts or rewards or hospitality of any kind in order to obtain business or contractual advantages.

Suppliers comply with applicable competition and antitrust laws. Business activities with Logicalis are to be conducted exclusively on the basis of objective criteria. Conflicts of interest in private matters or other economic or other activities, including those of relatives or other related persons or organisations, must be avoided from the outset.

Suppliers also undertake to fulfil the reasonable expectations of their client, suppliers, customers, consumers and employees with regard to the protection of personal data. When collecting, storing, processing, transmitting and passing on personal data, suppliers must comply with European and national laws on data protection (DSGVO or GDPR) and information security and the official regulations.

Suppliers must also comply all applicable export and import laws in the jurisdictions in which they operate. Customs obligations must be fulfilled and all other national and international laws and regulations relating to international business activities must be complied with. No supplier may take any action that conflicts with the trade sanctions imposed by the following institutions:

- HM Treasury (UK);
- the European Union;
- the United States Department of the Treasury and
- the United Nations (UN) or any other body related to the UN.

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.

Suppliers guarantee to comply with the legal regulations applicable to their business (social security laws, tax laws, General Equal Treatment Act, Temporary Employment Act, etc.).

3 Dealing with customers, suppliers, distributors and employees

Suppliers shall treat all individuals with respect and fairness and a business environment that is free from any inhumane behaviour. They shall treat their employees and any other party with respect and dignity and refrain from unlawful harassment. Suppliers are committed to equal opportunity and shall not discriminate against employees or applicants for employment on the basis of race, political opinion, colour, ethnic or social origin, gender (including pregnancy), age, marital status, disability, health status, nationality, sexual orientation, religion or any other basis prohibited by law.

Applicable wage and working time regulations and industry-specific minimum standards must be complied with, in particular regulations on minimum wages, overtime and paid holiday leave. The right of employees to form and join organisations of their choice, to engage in collective bargaining and to strike must be respected. Any form of forced or child labour must be avoided and it must be ensured that no materials are sourced from supply chains that associated with forced or child labour. Suppliers are for the payment of all legally binding fees and expenses that may be incurred in connection with their employees.

4 Occupational safety

Suppliers must comply with the applicable health, safety and labour protection laws. They are obliged to provide a safe and healthy working environment for their employees. The necessary precautionary measures against accidents and damage to health that may arise in connection with the work are taken by setting up and applying appropriate occupational safety systems. Suitable measures must be taken to prevent excessive physical or mental fatigue. In addition, employees are regularly informed and trained on applicable health and safety standards and measures. Employees are provided with access to drinking water in sufficient quantities and access to clean sanitary facilities.

5 Sustainability

Suppliers must comply with all applicable environmental laws, regulations and standards and seek to reduce negative impacts on the environment by conserving natural resources, such as reducing energy consumption, reducing water consumption and minimising waste production. We expect our suppliers to implement measures that support the Datatec Group's environmental and climate protection goals through the products and services they supply. In doing so, they should act efficiently and take into account the environmental impact. Suppliers are also expected to provide Logicalis with the relevant data on environmental and climate protection upon request.

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, suppliers are expected to establish processes in accordance with the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict-affected and high-risk areas. Smelters and refineries without appropriate, audited due diligence processes should be avoided.

6 Compliance and complaints procedure

Suppliers must pass on information received from Logicalis regarding accessibility, responsibility and the implementation of a complaints procedure to their employees in an appropriate manner. The complaints procedure must be accessible to employees while maintaining confidentiality of identity and effective protection against discrimination. If no notice is given, the suppliers themselves are responsible for setting up an effective grievance mechanism at company level for individuals and communities that may be affected by negative impacts.

We also encourage and welcome our suppliers to report violations or suspected violations of this SCOC via the confidential Navex Global Whistleblowing Platform at <https://secure.ethicspoint.eu/domain/media/en/gui/107508/index.html>. Here you can your concerns anonymously online or by telephone (toll-free). All matters reported via the anonymous whistleblowing platform are reported to the Datatec Audit, Risk and Compliance Committee and the Social and Ethics Committee. These committees were established by the Datatec Executive Board and have an approved policy for handling all complaints received. Sanctions against individuals who report matters relevant to SCOC compliance are strictly prohibited.

Logicalis may itself verify compliance with the aforementioned principles and requirements through self-assessment by suppliers (e.g. in the context of self-assessment questionnaires), risk-based audits at production sites or in other suitable ways if there is a justified reason (e.g. the suppliers are subject to a fine/ criminal proceedings, etc.).

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Continuous improvement

Logicalis strives to continuously improve its internal processes. It also expects its suppliers to ensure that the requirements of Logicalis and the Datatec Group are fully met by means of suitable, verifiable quality instructions, guidelines and procedures. Suppliers will work with Logicalis to develop and continuously improve processes so that products and services exceed customer expectations.

Place, date, name of the supplier:

Signature:

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Document owner

Responsible	Jürgen Hatzipantelis
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