

CONAPTO

SUPPLIER CODE OF CONDUCT



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INTRODUCTION

Conapto offers scalable, secure, and sustainable data center colocation as well as the cloud connectivity needed for companies and managed service providers to produce and deliver digital services in a hybrid IT-environment.

Our vision is *'World-class customer experience make us the first choice!'*.

At Conapto, we are committed to conducting business in a responsible and sustainable manner that respects the environment, society, and ethical business practices. We believe that our suppliers play a crucial role in upholding our values, goals, and contributing to a more sustainable future.

SCOPE

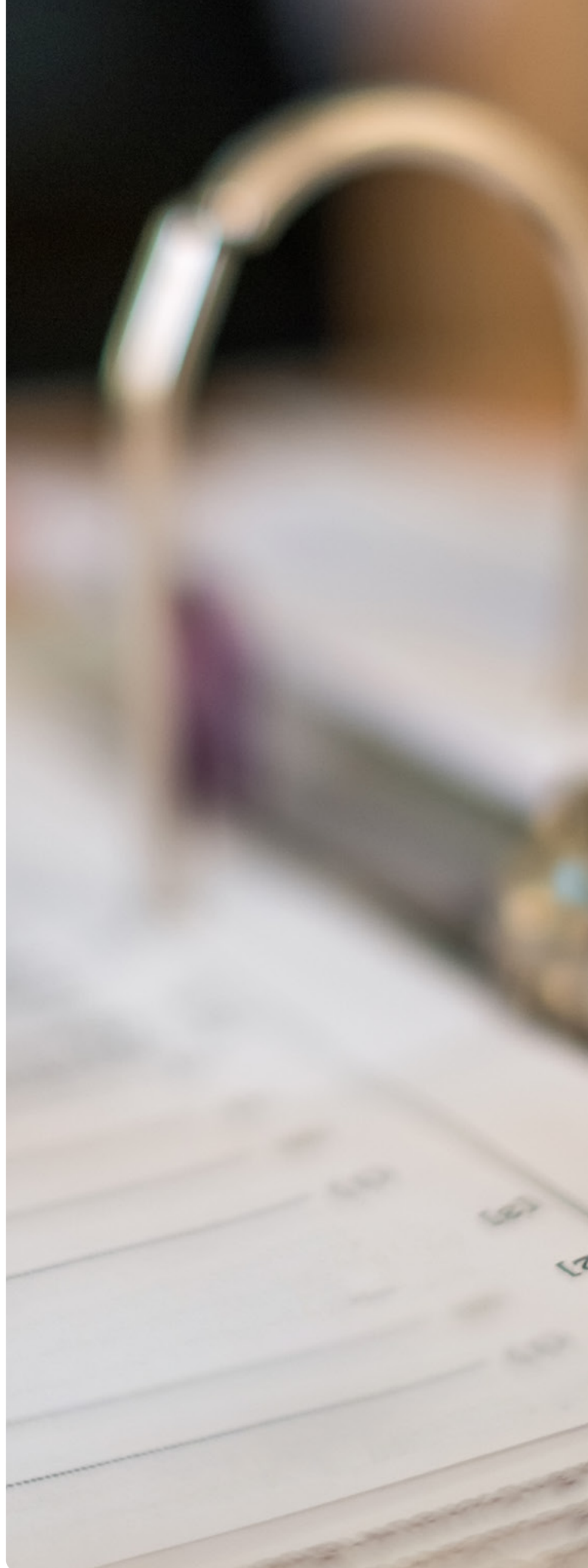
The Supplier Code of Conduct is an essential part of the agreement between Supplier and Conapto.

The term “Employee” used throughout this Supplier Code of Conduct covers everyone working for or on behalf of a Supplier, and board of directors. The Supplier Code of Conduct applies to all Suppliers that deliver goods and/or services to any entity of Conapto, including their parent, subsidiary, or affiliate entities as well as their respective employees and agents (hereinafter individually and collectively referred to as “Supplier”).

For each area of the Supplier Code of Conduct, Conapto has defined two categories for our Supplier’s sustainability performance and actions – Requirements and Aspirations:

A requirement refers to basic requirements which all Suppliers must comply with. A breach of a requirement is considered a breach of the Supplier agreement.

An aspiration refers to Supplier’s activities where Conapto encourages each Supplier to go beyond our basic requirements to further advance Supplier’s sustainable performance and impact in the areas covered by this Supplier Code of Conduct.





PURPOSE

The Conapto Supplier Code of Conduct outlines our expectations for suppliers to align with our Environmental, Social, and Governance (ESG) policies and sustainability requirements. The Supplier Code of Conduct is based on the Conapto Code of Conduct and the following international agreements and commitments:

The United Nations Universal Declaration of Human Rights

UN Sustainable Development Goals UNFCCC – Climate Neutral Now

The Fundamental Conventions of the International Labor Organization (ILO)

UN Global Compact

The United Nations Guiding Principles on Business and Human Rights

The OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises

ISO 9001, ISO 14001, ISO 27001 and ISO 50001



GENERAL REQUIREMENTS

Supplier shall comply with all the Requirements of the Supplier Code of Conduct and make active efforts to comply with the Aspirations.

Supplier shall ensure that all Requirements of this Supplier Code of Conduct are implemented and adhered to within its own operations and by its direct suppliers. We also encourage each Supplier to champion the benchmark standard regarding our Aspirations and to work proactively in their supply chain beyond their direct suppliers to implement similar standards as outlined in this Supplier Code of Conduct both regarding Requirements and Aspirations.



Supplier shall operate honestly and be transparent with facts and data in relation to both Requirements and Aspirations. Environmental data related to production, product and transport shall be available upon request to enable Conapto to conduct environmental life cycle assessments.

Supplier shall have its own Code of Conduct outlining the Supplier's rules of behaviour and proper conduct for the Supplier's Employees.

Supplier shall be proactive in appropriately addressing any risk of violation of the Requirements, whether in their facilities or in their supply chains.

HUMAN RIGHTS AND WORKING CONDITIONS

WAGES

REQUIREMENTS

Supplier shall always pay and provide its Employees' wages and benefits that, comply with applicable laws and collective bargaining agreements. Supplier shall provide its Employees with information about their employment terms and conditions, including benefits, in a format and language they can easily understand, such as a written employment contract and a timely wage statement.

Deduction from wages is permitted only if and to the extent prescribed by applicable law, regulations or collective bargaining agreements.

ASPIRATIONS

Supplier is encouraged to adopt a pay structure that adequately reflects Employee skills and experience enabling them to meet the basic needs of themselves and their dependents.



SLAVERY AND CHILD LABOUR

REQUIREMENTS

Conapto does not tolerate child labour, and Supplier shall prevent all forms of child labour.

Conapto does not tolerate any forms of modern slavery or forced labour, including but not limited to forced, bonded or compulsory labour and human trafficking. Consequently, Supplier, including their recruitment agencies, shall not engage in or tolerate restrictions of movement, excessive recruitment fees, confiscation of identity documents and/or passports, withholding of wages, abusive working conditions, debt bondage, violence or any other kind of exploitation or abuse.

ASPIRATIONS

Supplier is encouraged to have adequate policies, risk awareness, risk assessment and due-diligence processes in place to prevent modern slavery and forced labour throughout its supply chain.

Supplier is further encouraged to engage constructively with relevant stakeholders such as recruitment agencies, non- governmental organisations and industry associations to build awareness and proactively work towards preventing modern slavery and forced labor.





HEALTH AND SAFETY

REQUIREMENTS

Supplier shall ensure that its Employees' potential exposure to safety hazards, are identified, assessed and that preventative actions are taken. Where hazards cannot be adequately controlled,

Employees shall be provided with appropriate personal protective equipment including access to first-aid supplies. Safety information shall be available to educate, train, and protect the

Employees from safety hazards. Supplier shall have adequate emergency preparedness procedures to identify and assess potential emergency situations. Emergency plans, fire safety, response procedures and evacuation procedures shall be implemented.

Employees shall have ready access to clean drinking water, hygienic toilet facilities, hygienic food preparation, storage and eating facilities, adequate ventilation, light and temperature levels, and acceptable levels of noise and dust pollution.

ASPIRATIONS

Supplier is encouraged to work pro-actively with a long-term health and safety strategy for both mental and physical wellbeing.

WORKING HOURS

REQUIREMENTS

Supplier shall always respect and comply with applicable laws and collective bargaining agreements, if applicable, on working and resting hours, including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations.

ASPIRATIONS

Supplier is encouraged to maintain reasonable working hour schedules for its Employees to prevent quality and safety incidents and to minimize strains on Employees' physical and mental health. Supplier is encouraged to comply with ILO standards on working hours and leave.





INCLUSIVENESS, RESPECT AND DISCRIMINATION

REQUIREMENTS

Supplier shall work actively to eliminate all forms of disrespectful behavior, bullying, discrimination, harassment or sexual harassment.

Supplier shall treat everyone with dignity and respect and provide equal employment opportunities and conditions based on the individual's ability to do the job, regardless of Employee or job applicant characteristics including, but not limited to; gender, gender identity, age, nationality, race, ethnicity, skin color, or cultural background, religion, belief, disability, genetics, health information, pregnancy, sexual orientation or union affiliation.

Supplier shall not tolerate humiliating or physical punishment or allow any Employee to be subject to verbal, psychological, physical or sexual harassment or abuse.

ASPIRATIONS

Supplier is encouraged to actively promote diversity and inclusion and provide equitable benefits and working conditions accommodating all categories of human diversity.

Supplier is encouraged to engage constructively with relevant stakeholders such as non-governmental organisations and industry associations to build awareness and proactively work towards identifying root causes of discrimination if it is a widespread societal issue.

ANTI-BRIBERY AND CORRUPTION

REPRESENTATION, CONFLICT OF INTERESTS AND GIFTS

REQUIREMENTS

Conapto does not accept any form of corruption, bribery or fraud. Supplier shall inform Conapto if any Conapto Employee has an interest in the Supplier's business which might cause a conflict of interest.

Supplier must not provide any gift or present to a Conapto employee that might influence, or appear to influence, decisions in relation to Conapto's business with Supplier.

Supplier and all persons acting on their behalf shall comply with all applicable anti-corruption laws while conducting business with Conapto. The direct or indirect offer, granting or acceptance of illegitimate benefits to generate, maintain or accelerate business is unacceptable.

Supplier must ensure that no such benefits are exchanged while conducting business together.

ASPIRATIONS

Supplier is encouraged to conduct appropriate risk-based due diligence prior to engaging any sub-supplier to ensure that such third parties comply with all applicable anti-corruption laws.





ENVIRONMENT

ENVIRONMENTAL MANAGEMENT SYSTEM ISO 14001

REQUIREMENTS

Conapto is certified and operates in accordance with the Environmental Management system standards known as ISO 14001. Supplier shall recycle waste in the daily work, such as paper, electronics, metal, packaging, fluorescent lamps and batteries. Supplier shall minimize the amount of waste generated and make efforts to, when possible, reuse materials, equipment, tools and products.

Conapto's suppliers are assessed, among other things, based on their environmental work. When purchasing products and consumables, energy performance must be a parameter.

ASPIRATIONS

Supplier is encouraged to implement their own Environmental Management system based on international standards such as ISO 14001, designed to identify, control, and mitigate significant environmental impacts.



GREENHOUSE GAS EMISSIONS

REQUIREMENTS

Conapto expects its Suppliers to reduce their negative environmental impacts by protecting the environment, conserving natural resources and continuously striving towards reducing the environmental footprint of their production, products and services throughout their entire life cycle.

Supplier shall monitor, track and document its emissions generated from its products, services and transports to be able to identify aspects where the Supplier can improve and minimize emissions.

Supplier is encouraged to provide Conapto with CO₂ equivalent (CO₂e) of products and services delivered to Conapto.

ASPIRATIONS

Supplier is encouraged to eliminate greenhouse gas emissions and pollutants at the source or by other adequate measures. The CO₂ equivalent (CO₂e) of all products and services delivered to Conapto by

Supplier shall be tracked, documented and reported to Conapto proactively as a standard procedure.

Supplier is encouraged to control and treat wastewater and solid waste generated from the operations, industrial process and sanitation facilities of the Supplier prior to discharge or disposal.

Supplier is encouraged to design all packaging material in a way that facilitates a circular economy approach.



ENERGY USAGE

REQUIREMENTS

Supplier shall make efforts to monitor, track and document its consumption of natural resources such as water and raw materials, as well as sources of energy to be able to identify aspects that Supplier can control and can influence fostering opportunities for improvement and minimized consumption.

ASPIRATIONS

Supplier is encouraged to use and consume natural resources and sources of energy in an optimised and efficient way, with particular focus on implementing conservation and recycling practices in Supplier's production and maintenance processes.

At all times, we encourage Supplier, when suitable alternatives are available, substituting materials and methods posing potential environmental and health related risks.

INTEGRITY

FAIR COMPETITION

REQUIREMENTS

Conapto believes that fair competition is best for our company, owners, customers, suppliers and employees. Fair competition stimulates efficiency and innovation which constitutes the foundation of a proper market economy.

Supplier shall respect and comply with all applicable fair trade, competition and anti-trust laws and regulations and shall not have any anti-competitive discussions or enter into any anti-competitive agreements, including illegal price-fixing, market sharing, customer allocation or other illegal restrictive practices, at any level of the production or distribution chain.

ASPIRATIONS

Supplier is encouraged to implement a corporate or group wide compliance program on fair competition applicable to all Supplier's affiliate organizations.





CONFIDENTIAL

CONFIDENTIALITY, INTELLECTUAL PROPERTY AND DATA PRIVACY

REQUIREMENTS

Supplier shall respect Conapto's confidential information and intellectual property rights by safeguarding against misuse, mishandling, counterfeit, theft, fraud or improper disclosure in accordance with applicable law and the contractual terms with Conapto.

ASPIRATIONS

Supplier is encouraged to implement an information management strategy, including a policy which ensures proper levels and thresholds as well as records for proper business integrity.

Supplier should implement a whistle-blower process where its Employees can anonymously raise any concerns of misconduct.



INFORMATION SECURITY

REQUIREMENTS

Conapto is certified and operates in accordance with the Information Security Management system known as ISO 27001.

Supplier shall ensure that its Employees are trustworthy and have passed formal vetting procedures. It is also expected that Supplier has a documented information security policy, processes in place to manage security incidents and provide security awareness training for its Employees.

ASPIRATIONS

Supplier is encouraged to implement an Information Security system based on international standards such as ISO 27001, designed to identify, control, and mitigate information security risks.

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