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## Supplier Code of Conduct of Lounea Group

Our ethical procurement guidelines are based on Lounea's Code of Conduct and our responsibility principles. We act in accordance with these principles ourselves, and we also require our partners to commit to operating in accordance with these guidelines.

### 1. We always comply with the law and the commitments we have made

- Compliance with the laws and regulations that are binding on us is the starting point for all our activities.
- In addition to general business legislation, our network operations are regulated by authorities who impose special requirements on us. These requirements relate to, for example, information security and protection, network infrastructure, preparedness, and the rights of service users.

### 2. Occupational safety

- Occupational safety is the foundation of everything we do.
- While working, we do not take occupational safety risks on our own behalf or on behalf of others.
- We take care of our working environment, working methods and tools.
- Keeping our workplace safe and tidy is caring for others and an important factor in promoting occupational safety and preventing accidents.

### **3. We respect human rights and are a responsible employer**

- We respect and support human rights and equality in everything we do.
- We do not tolerate violence, abuse, bullying or harassment of any kind.
- We do not accept discrimination on the basis of gender, nationality or ethnic origin, age, religion, sexual orientation, political or other views, social status, family relationships, or other personal characteristics.
- As an employer, we follow the principles of non-discrimination in all our operations. Diversity strengthens our expertise and contributes to learning together.
- We are all responsible for the comfort and safety of our working community. Everyone has the right to work in a healthy and safe working environment.
- We promote well-being at work and occupational health and safety through good management and by taking care of our colleagues.

### **4. We respect the trade secrets of our customers and partners**

- We take care of the appropriate handling and protection of our customers' trade secrets and classified information received from the authorities.
- We do not process or disclose trade secrets in our own operations or to stakeholders in violation of our instructions.

### **5. We procure responsibly and require our partners to act responsibly**

We follow the principles of sustainable and responsible sourcing in our procurement and partner agreements:

- We comply with the agreements made and act fairly and transparently.
- We value partners who are innovative, who continuously develop their operations, and who have the right values and effective processes, measured high quality, and the ability to achieve agreed goals, and who bring value to our customers, personnel or owners.
- We check the background and operational safety of our partners and suppliers.

- We pay special attention to human rights, and we are committed to ensuring that there is no forced labour or human trafficking in our operations and supply chain.
- Our partners must have active processes to improve the use of limited resources (such as energy, water, raw materials), promote recycling and reuse, and ensure proper waste management.
- Our partners comply with applicable national and international environmental laws and standards and actively strive to reduce their own emissions.
- Our partners must commit to complying with the principles of responsible procurement in their own supply chains, as well.

## **6. We do not accept bribery, corruption or extortion**

- We will never pay, offer, request, demand or accept bribes or other undue advantage.
- When offering or receiving hospitality or gifts, we act with care. Only a reasonable and customary gift is acceptable. We never give or accept money or anything like that as a gift.
- The person involved in the procurement process does not participate in the customer events of the tendering suppliers.

## **7. Environmental sustainability and climate measures are genuinely important to us**

- We offer our customers sustainable and environmentally friendly digital services, and we operate in a way that is as climate efficient as possible.
- We have set ourselves goals to reduce our own carbon footprint.
- We also favour recycling-based alternatives in our procurement.

## **8. We always compete fairly**

- Cooperation between competitors is basically prohibited.
- Lounea operates in different roles in the market, and in some situations, cooperation with competitors may be allowed.
  1. We do not accept prohibited cooperation between competitors, and we do not discuss prices, productizations, future plans or other trade secrets with our competitors.
  2. We also avoid unnecessary contact with competitors. When we meet competitors, we only deal with what is allowed.

## **9. We communicate openly and follow a good corporate governance code**

- We communicate with all our stakeholders in an open, fair and up-to-date manner, in accordance with the principles of the Good Governance Code.
- The principles of financial and investor communications are defined in more detail in Lounea's Disclosure Policy.
- We communicate actively and in a multichannel manner about our services and operations. When engaging in dialogue with our stakeholders on social media, we follow good manners and our internal guidelines.

## **10. We identify and avoid conflict of interest situations**

- We are committed to responsible business conduct and avoid conflicts of interest.
- A conflict of interest is a situation in which a person is forced to make a choice between duties related to work and personal interests. Situations that can be expected to cause conflict should also be avoided.
- A conflict of interest may arise, for example, from a donation, sponsorship, or a significant agreement.
- Even if the agreement is in the company's best interests, a conflict of interest may arise in a situation in which the contract is concluded with someone in a person's close circle, such as a family member or other close relative.

## **11. We do not accept money laundering**

- We contribute to the prevention of money laundering and terrorist financing with all the means at our disposal.
- We only use and accept commonly used currencies for our payment transactions
- Money laundering involves suspicion regarding the legal origin of funds, while terrorist financing can take place with legally acquired funds, in which case the suspicion is directed at the intended use of the funds.

## **12. We address grievances and, if necessary, report them forward**

- It is up to each of us to adhere to these Code of Conduct principles and to promote their implementation.

# Lounea

- Louneans, Lounea's partners, and other stakeholders in the company can also report violations of Lounea's Code of Conduct through the anonymous whistleblowing channel available on the Lounea website. All contacts are taken seriously and treated confidentially.