

**Code of Conduct for Business Partners of
IONOS Group SE**

(Supplier Code of Conduct)

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Table of contents

Preview	2
REQUIREMENTS FOR THE BUSINESS PARTNERS OF IONOS GROUP SE	3
1. ETHICAL BUSINESS CONDUCT 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.....	4
2. SOCIAL AND ENVIRONMENTAL DUTIES OF CARE	4
2.1 Human rights and working conditions.....	4
2.1.1 Decent wages and working hours and freedom of association.....	4
2.1.2 Forced labour and modern slavery.....	5
2.1.3 No child labour.....	5
2.1.4 Prohibition of discrimination.....	6
2.1.5 Health protection and occupational safety.....	6
2.1.6 Conflict minerals and conflict metals.....	6
2.1.7 Land expropriation.....	7
3. ENVIRONMENTAL AND CLIMATE PROTECTION	7
4. IMPLEMENTATION OF THE DUE DILIGENCE OBLIGATIONS	8
4.1 Compliance with requirements.....	8
4.2 Complaints procedure.....	8

Preview

Within our business relationships, it is our aspiration to act as a reliable and trustworthy partner and to fulfil our corporate duties of care.

IONOS Group SE is committed to ecologically and socially responsible corporate governance. We expect you, as our business partner, to meet 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 the guidelines of the IONOS Group SE, and substantiates the principles set out in the "Policy Statement on Respect for Human Rights and Related Environmental Standards" stated guiding principles for the business partners of IONOS Group SE. It defines the minimum requirements that you as a supplier of IONOS Group SE must observe and fulfil, as well as our clear expectations. We expect you, as our business partner, to address these appropriately to your partners as well. Compliance with the minimum requirements formulated in this standard is bindingly stipulated in the General Terms and Conditions of Purchase of IONOS Group SE.

In the event of a conflict of provisions formulated for this purpose with contractual agreements between a supplier and IONOS Group SE or with the General Terms and Conditions of Purchase of IONOS Group SE, the contractual agreements or the General Terms and Conditions of Purchase shall prevail. Working in partnership with our business partners is of utmost importance to us. We are certain that we can only improve our sustainability performance through continuous supplier development and consistent supplier management. Your cooperation as a business partner is crucial to success and forms the basis for our business relationship.

REQUIREMENTS FOR THE BUSINESS PARTNERS OF IONOS GROUP SE

1. ETHICAL BUSINESS CONDUCT AND COMPLIANCE

1.1 Compliance

The business partner of IONOS Group SE shall comply with all relevant laws, regulations and ordinances. He shall take appropriate measures to ensure compliance with the statutory provisions and the internal company guidelines of IONOS Group SE - to the extent known - and to work towards their observance.

1.2 Integrity in business transactions

The highest standards of integrity shall be applied in all business activities. The business partner shall adopt a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be applied to ensure compliance with anti-corruption laws.

1.3 Fair Competition

The business partner shall behave fairly in competition and comply with all applicable competition and antitrust laws.

1.4 Information security and Data protection

The protection of information is one of the most important values of IONOS Group SE. We understand

"information" to mean all data and content available in the company. This includes electronically stored information as well as information in paper form or as the 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 organisational measures.

1.5 Intellectual Property

Intellectual property rights shall be respected; technology and know-how transfers shall be made in a way that protects intellectual property rights and customer information.

2. SOCIAL AND ENVIRONMENTAL DUTIES OF CARE

2.1 Human rights and working conditions

For the IONOS Group SE, respect for human rights is an integral part of its corporate culture. In this respect, IONOS Group SE is guided by the UN 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, where necessary, remedy them. IONOS Group SE also expects this from its business partners and their suppliers.

2.1.1 Decent wages and working hours and freedom of association

The business partner shall pay its employees an adequate wage as defined in Art. 7 a) (ii) of the United Nations International Covenant on Economic, Social and Cultural Rights. This means that the wages and social benefits comply with the respective national laws and, if binding, industry standards. In particular,

business partners resident 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 relevant, the collectively agreed regulations on maximum working hours. Overtime is only permissible if it is performed on a voluntary basis and if it does not exceed the limits set by law and internationally recognised standards, for example the International Labour Organisation Convention (ILO Convention).

The business partner is committed to respecting freedom of association and the right to form interest groups to represent common purposes and objectives, in line with the third principle of the UN Global Compact. 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 must not use forced, prison, slave or compulsory labour. Forced, captive, slave or compulsory labour may be understood to mean, 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 shall not employ children below the minimum age set by the ILO or national laws. The minimum age for employees shall be the applicable minimum age under national law of the supplier's location or the age at which compulsory education in that country ceases, whichever is higher.

2.1.4 Prohibition of discrimination

The business partner shall create a working environment free from psychological, physical, sexual or verbal abuse, intimidation, threats or harassment. In its personnel decisions, the business partner shall commit to equal opportunities. Discrimination on the basis of nationality and origin, ethnic or political affiliation, gender, religion or belief, 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 ensure the proper implementation of the applicable legal requirements for the Code of Conduct for Business Partners of IONOS Group SE. The business partner shall comply with all applicable occupational health and safety standards, as well as with internationally recognised standards, such as ISO 45001 and ILO conventions. The business partner shall observe the prohibition of harassment, abuse and punishment with any form of violence at work, also with regard to a 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 Guiding Principles to Promote Responsible Supply Chains for Minerals from Conflict and High-Risk Areas.

2.1.7 Land expropriation

The business partner must refrain from any illegal clearance and illegal expropriation of land, forests or waters. Furthermore, suppliers must ensure that no legally illegal evictions occur.

3. ENVIRONMENTAL AND CLIMATE PROTECTION

The Business Partner undertakes to comply with all applicable environmental legislation and to implement internationally recognised standards of corporate 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 IONOS Group SE shall comply with all relevant pollutant laws, regulations and ordinances, e.g. RoHS (Restriction of Hazardous Substances), REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) or ELV (End-of-Life Vehicle) and provide evidence thereof, if applicable. 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 importing and exporting hazardous waste under the Basel Convention, as well as the prohibition of the use of mercury and mercury compounds in product manufacturing, including the proper handling of mercury waste, under the Minamata Convention.

We recommend our business partners to formulate and implement their own reduction targets to reduce CO₂ emissions, e.g. by predominantly purchasing electricity from renewable energy sources.

4. IMPLEMENTATION OF THE DUE DILIGENCE OBLIGATIONS

4.1 Compliance with requirements

IONOS Group SE 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 as well as 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 at home and abroad that are required to manufacture the products and provide the services.

4.2 Complaints procedure

In the event of potential breaches of the above requirements, IONOS Group SE has set up a complaints procedure in the form of the "IONOS Integrity Line", which can be reached at the following address:

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

The complaints procedure of IONOS Group SE is designed across departments and depending on the reported facts. The business partner informs its employees about the usability of the publicly available "IONOS Integrity Line". Further information on how to deal with complaints can be found in the [Rules of Procedure](#).