

Policy Statement of the conet Group



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I. Foreword



In an increasingly networked and digitalized world, IT service providers such as conet are key players that significantly influence the way people work, communicate, and live. This role comes with a special responsibility that goes beyond economic success. It requires us to respect and promote human rights and the protection of our environment, not only within our own organization, but also throughout our entire supply chain.

Our commitment to respecting human rights is based on the deep conviction that every human being has the right to dignity, equality, and freedom. These values are non-negotiable and form the foundation of our corporate culture and business strategy. We are committed to respecting and promoting human rights and environmental protection in all aspects of our business and to acting in accordance with the requirements of the The Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG).

We firmly believe that respect for human rights and the environment is not only a moral obligation, but also an essential component of sustainable economic success. With this policy statement on respecting and promoting human rights and our environment, we want to take another important step toward moving our company toward a sustainable future.

Martin Wibbe
CEO

Daniela Bünger
CFO

II. conet Group's Commitment to Respecting Human Rights and the Environment



As a responsible company, we recognize the fundamental importance of respecting human rights and promoting sustainable environmental practices. We are committed to upholding the highest ethical standards in all our business activities and relationships and to making a positive contribution to society and the environment.

This policy statement pursuant to Section 6 II LkSG applies to the entire conet Group.

We align our business activities with internationally recognized frameworks and standards:

- United Nations Universal Declaration of Human Rights (UDHR)
- UN Guiding Principles on Business and Human Rights
- Ten Principles of the UN Global Compact
- European Convention for the Protection of Human Rights and Fundamental Freedoms
- Core labor standards of the International Labor Organization (ILO)
- United Nations Sustainable Development Goals
- OECD Guidelines for Multinational Enterprises

We respect the dignity, privacy, and rights of every individual, regardless of origin, gender, religion, age, sexual orientation, or other personal characteristics. Our employees are always treated fairly, and we ensure safe and healthy working conditions. We strictly reject any form of forced labor, child labor, or discrimination.

conet's commitment to environmental protection is equally deeply rooted. We recognize the urgent need to conserve our planet's natural resources and combat climate change. We are therefore committed to sustainable business strategies that promote environmental responsibility. For us, this means, in particular, the efficient use of energy and minimizing our carbon footprint. We are continuously working to implement environmentally friendly technologies and practices and to make our supply chain sustainable.



1.1. conet's human rights and environmental principles and expectations

We have identified the following relevant human rights and environmental principles and expectations for conet's business areas. We are committed to respecting the internationally recognized standards mentioned above and to observing them in our business activities and along our value chains.

This includes in particular:

- Prohibition of child labor
- Prohibition of slavery and forced labor
- Occupational health and safety
- Prohibition of unequal treatment in employment
- Zero tolerance for any form of violence and harassment
- Prohibition of withholding fair remuneration
- Prohibition of environmental pollution

These describe our values and standards, which are further specified in our internal guidelines and processes, thereby forming our framework for action and the fundamental building blocks of our corporate culture.

2. Relevant and potential groups of people

The following groups of people, whose human rights could potentially be negatively or positively affected by our business along the supply chain, are given priority consideration:

- conet's own employees at national and international locations
- Non-employees of all conet companies over whom conet exercises direct influence
- Employees of our direct and indirect suppliers
- Persons belonging to our customers

When carrying out our due diligence processes, we therefore take particular account of the interests of particularly vulnerable groups of people. If we receive concrete indications of a possible violation of human rights or environmental obligations by indirect suppliers, we also include them in our review.

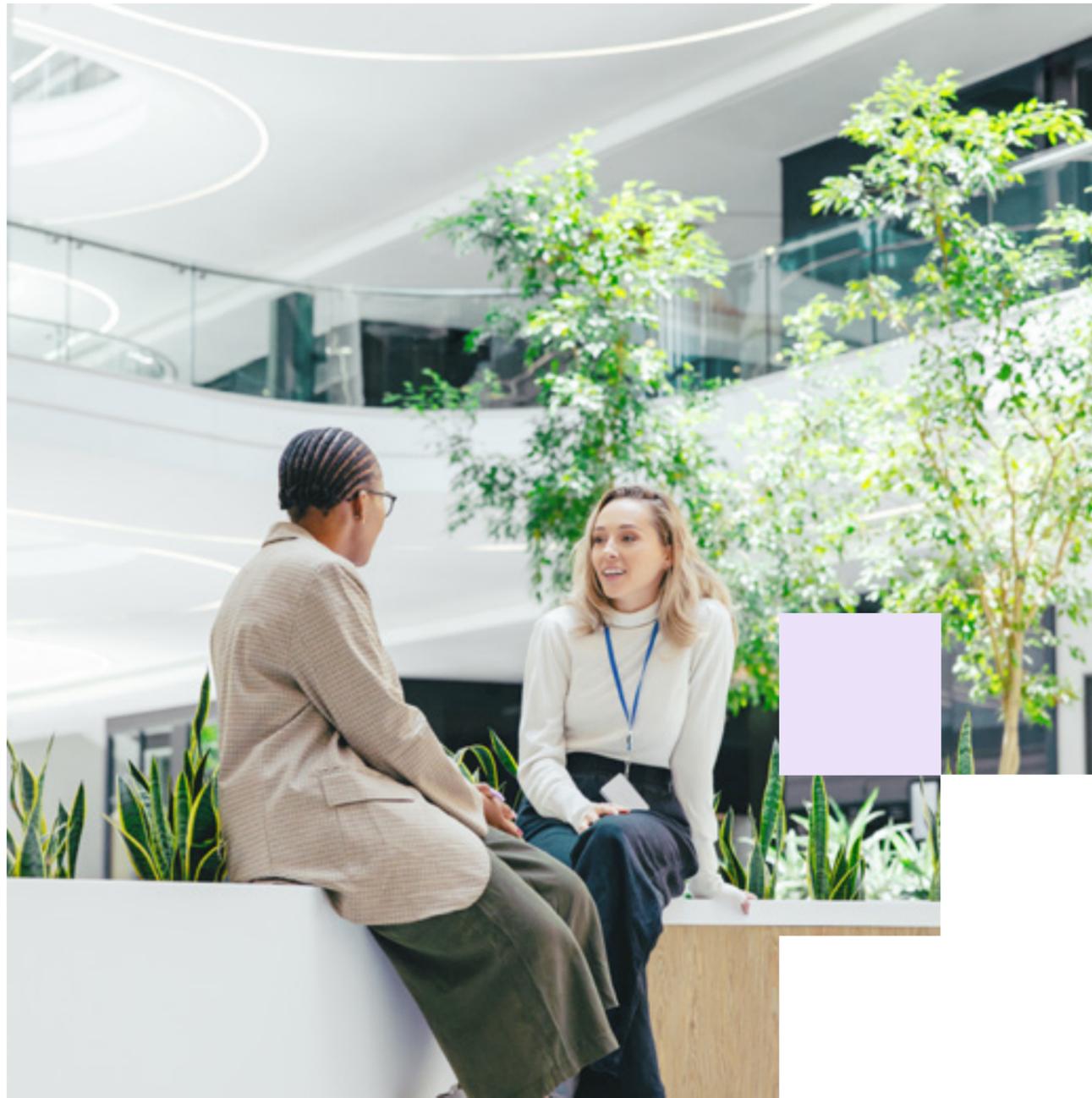
3. Our principles and expectations towards our suppliers

The principles set out in this policy statement apply both to our own business and to our suppliers along the supply chain. In addition, conet expects compliance with applicable laws and regulations as well as internationally recognized human rights and environmental standards.

The principles and expectations set out herein constitute a non-negotiable minimum that suppliers must respect and comply with in all business transactions with conet. They must implement risk-based due diligence processes and pass on these expectations to their own suppliers in order to prevent identified risks and violations. In addition, we implement procedures, jointly if necessary, to verify compliance with these standards. We are particularly committed to the responsible sourcing of raw materials throughout the entire supply chain and therefore require compliance with standards in the handling of raw materials, especially conflict minerals.



III. The conet Group's Approach to Implementing Human Rights and Environmental Due Diligence Obligations



In the course of our business activities, people in the conet Group and along our entire value chain are exposed to various potential human rights and environmental risks. Our uniform management approach helps to analyze risks and, above all, to prevent or minimize any violations of the human rights of those potentially affected.

1. Risk analysis in our own business area and among direct suppliers

Based on our business activities, all potential human rights and environmental risks are first identified using the topics specified in Section 2 (2) and (3) of the LkSG.

To this end, conet's risk and supplier management has been systematically expanded to include human rights and environmental issues. Risks related to human rights violations and environmental aspects, as well as potentially affected parties, are identified and assessed through a multi-stage management process.

To this end, the risk analysis first involves an abstract consideration of industry-specific and country-specific risks. Using risk analysis software, the analysis covers not only conet's own business area but also its direct suppliers. For those areas or direct suppliers of conet where the abstract risk analysis identifies an increased risk exposure, the next step is to assess and prioritize specific human rights and environmental risks. The identified risks are assessed and prioritized based on their probability of occurrence and the severity, extent, and irreversibility of their potential impact on those affected. Where possible and appropriate, criticism regarding third-party risks and incidents reported through the complaints procedure are also taken into account.

The analysis of human rights and environmental risks in conet's own business area and among its direct suppliers is updated annually and on an ad hoc basis in the event of significant changes to the company's profile or business activities. To this end, internal and external expert knowledge, business partners, and selected stakeholders are involved in the risk analysis as necessary. If there are actual indications that an indirect supplier may have violated its duty of care, conet extends the risk analysis to this indirect supplier.

The potential risks identified for conet are weighted and prioritized.

Our risk analysis for our own business area resulted in a low risk rating for human rights and environmental risks. The focus here is on occupational health and safety.

Taking into account an initial cautious assessment approach, the risk analysis for direct suppliers resulted in an overall classification in the low to medium risk range. When weighting the risks, we consider child labor, occupational safety, working hours, minimum wage, and environmental protection to be priority issues on which we are focusing more intensively.

Our corporate decision-making processes, including the selection of suppliers, are supported by the results of the analysis of human rights and environmental risks and impacts. The results of the risk analysis are also incorporated into the creation and adaptation of internal policy documents, processes, and training courses in order to meet the dynamic requirements of our due diligence processes and obligations.

The analysis is carried out annually. In the event of significant changes, the risk analysis is also carried out on an ad hoc basis.

The associated processes and results are documented, stored, and incorporated into the annual reporting to the Federal Office of Economics and Export Control in accordance with Section 10 (2) LkSG, following essential criteria.

2. Preventive measures

We strive to fulfill our responsibility to protect human rights and fundamental environmental concerns to the best of our ability. That is why we rely on a risk-based approach. This means that the findings of the risk analysis are systematically evaluated and prioritized in order to implement targeted preventive measures where the risk of violations is highest. The implementation of preventive measures is part of the systematic risk management process. The following describes the principles and measures used to embed preventive measures in business processes:

Preventive measures in our own business area:

In our own business area, we rely on a system of preventive measures to minimize risks in our internal processes and ensure sustainable business activities in line with our principles.

That is why we develop and implement clear corporate guidelines and a Code of Conduct that expresses the importance of human rights and environmental concerns and thus forms the core of our preventive measures and our expectations for a responsible working environment. The Code of Conduct is an integral part of our compliance management system. Regular audits ensure that these standards are adhered to.

Another important aspect is our complaint mechanism, which enables our employees to report human rights violations or environmental problems. The protection of whistleblowers is, of course, guaranteed.

A major part of our preventive measures is training and raising awareness among our employees at all levels on topics such as human rights, environmental responsibility, and sustainable business practices.

A system of internal controls and monitoring mechanisms ensures that the risk management process is effective and that compliance with the guidelines is guaranteed.

Preventive measures relating to suppliers:

In addition to our own business area, the risk management process focuses on our direct suppliers.

This is achieved through various contractual provisions, among other things. Our Code of Conduct for Business Partners sets out detailed requirements regarding human rights and environmental standards. This document, which is binding for all supplier relationships, makes compliance with non-negotiable minimum standards a condition of the business relationship. To ensure that these requirements are not just formal guidelines but are actually implemented, we will also include human rights and environmental clauses in supplier contracts in the future.

In addition, we conduct regular audits of suppliers to verify compliance with our standards. The right to conduct audits is enshrined in our Code of Conduct for Business Partners. These suppliers are selected on a risk-based basis.

Information measures for our suppliers raise awareness of our human rights and environmental policy among them and their employees. Where necessary, we support capacity building among our

suppliers to promote the implementation of sustainable practices and, where appropriate, to develop and implement improvement plans if violations are identified.

Prevention is a continuous process that aims to systematically address human rights and environmental challenges. By implementing these comprehensive measures, we at conet can significantly reduce risks related to human rights and environmental issues while promoting sustainable and responsible business practices. The results of the risk analysis and prevention measures are incorporated into the regular supplier evaluation.

3. Effectiveness monitoring

Operational responsibility for development, control, and implementation is anchored in the Compliance department. In addition, various departments are responsible for the operational implementation of our human rights and environmental due diligence processes, including Procurement and HR. If necessary, they receive support from other specialist departments.

Appropriate control of the comprehensive process is ensured by compliance, together with regular effectiveness checks. The conet Group carries out annual and ad hoc checks both within its own business area and within its supply chain in order to verify the effectiveness of the measures implemented and to prevent and mitigate adverse human rights impacts. The focus is on prioritized risks and the impacts and objectives of these measures. conet uses the findings from the controls, cooperation with external experts and stakeholders, suppliers, and the results of risk analyses to continuously optimize and further develop its human rights and environmental management.

4. Training

We consider it an essential part of our due diligence obligations to sensitize our employees to the importance of environmental and human rights and to provide them with the necessary expertise to effectively implement environmental and human rights due diligence processes. Therefore, in the medium term, we intend to integrate due diligence obligations into our e-learning training courses, which are mandatory for all employees.

These specific training courses are designed to impart detailed knowledge and practical skills so that our employees can effectively meet legal requirements and strengthen environmental and human rights standards throughout our supply chain.



IV. Complaint Procedure



Our digital confidential reporting system complements our supply chain strategy in accordance with the requirements of the Act on Corporate Due Diligence Obligations in Supply Chains. All potential complaints and reports are recorded by our specialist staff in the Compliance Department for further processing in accordance with legal requirements and taking into account the protection of the complainant, and are treated with strict confidentiality.

All employees of the conet Group companies and our business partners have the opportunity to report violations of laws, the code of conduct, and guidelines – even completely anonymously – at <https://conet.whistleblower-system.de>.

Further information, particularly regarding the procedure, can be found in the [rules of procedure](#) on our company website.

In addition to our confidential reporting system, there are also other ways to address complaints and concerns to us:



Phone: +49 228 9714-0

E-mail : compliance@conet.de

Postal address:
conet Holding GmbH
Compliance Department
Bundeskanzlerplatz 2
53113 Bonn

conet thus promotes a culture of openness in which serious concerns about the business practices of the conet Group and its supply chain can be expressed to the best of one's knowledge and belief and without fear of reprisals.

V. Remedial Measures



conet is committed to adhering to the highest standards in terms of human rights and environmental protection. This is not only a moral imperative, but also a legal obligation. As soon as we determine that a violation of a human rights-related or environmental-related obligation has already occurred or is imminent in our own business area or at a direct supplier, we take appropriate remedial action without delay. The aim is to prevent or end these violations or to minimize their extent.

If a violation at a direct supplier is such that it cannot be remedied in the foreseeable future, we immediately develop a plan to end or minimize the violation. This plan includes a specific timeline and may involve working with the offending company to develop and implement a plan to end or minimize the violation, joining forces with other companies as part of industry initiatives and standards to increase leverage over the offender, and temporarily suspending the business relationship while efforts to minimize risk are underway.

Termination of a business relationship is considered as a last resort if the violation is assessed as very serious, the measures developed in the plan do not remedy the situation after the specified time has elapsed, no milder means are available, and an increase in leverage does not appear promising.

As soon as we have credible information (substantiated knowledge) that makes a violation by an indirect supplier appear likely, we carry out a detailed risk analysis. In doing so, we take into account in particular the severity of the risk, the type of rights affected, and our ability to exert influence, and derive appropriate measures from this.

VI. Reporting

The conet Group regards the fulfillment of its due diligence obligations as a continuous improvement process. For this reason, we regularly review the measures taken to implement our due diligence obligations in order to identify any potential need for action. In the annual report to the Federal Office of Economics and Export Control (BAFA), which is available to the public, the public is informed about the conet Group's voluntary commitments, its due diligence processes, and their effectiveness. In addition to the identified human rights and environmental risks and impacts in its own business area and among its direct suppliers, the report also covers the effectiveness of the preventive and remedial measures implemented.

