



Code of Conduct for Suppliers of the BITMARCK Group

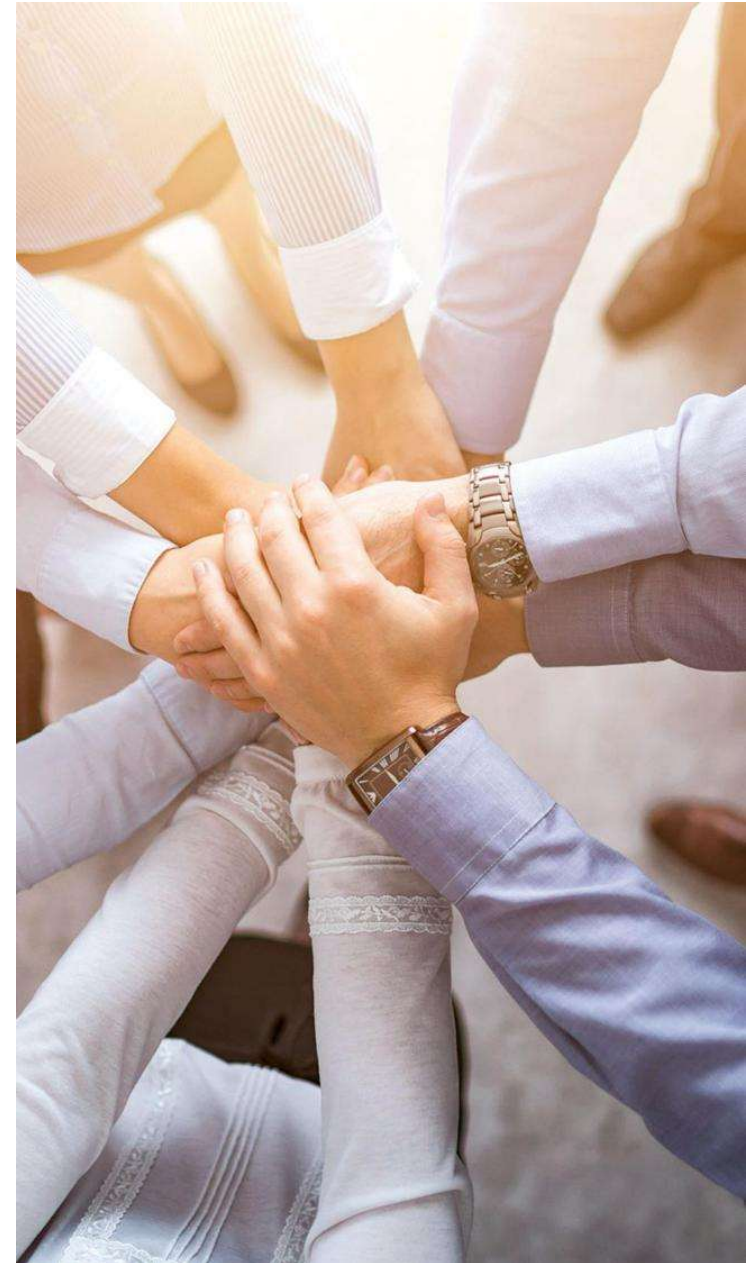
Essen, 01 January 2024

Our Code of Conduct for Suppliers

Together, we are collectively responsible for the economic, ecological and social impact of our actions on the world. The BITMARCK Group complies with applicable laws and is committed to respecting social and ecological considerations.

The following Code of Conduct for Suppliers sets out the **framework for the ethical conduct** that BITMARCK expects from its **contractual partners, suppliers, manufacturers and all third-party contractors (subcontractors)**.

All BITMARCK suppliers are therefore required to implement the requirements of this Code of Conduct **into their own processes and supply chains**.



Legal Compliance

The supplier **agrees**, that all business activities carried out on behalf of BITMARCK shall **comply with the requirements of the Code of Conduct for Suppliers** and acknowledges that compliance with this code is a necessary prerequisite for maintaining its status as a supplier to BITMARCK.

Furthermore, the supplier declares that all business activities carried out on behalf of BITMARCK will be conducted in accordance with applicable laws, rules, regulations and guidelines.

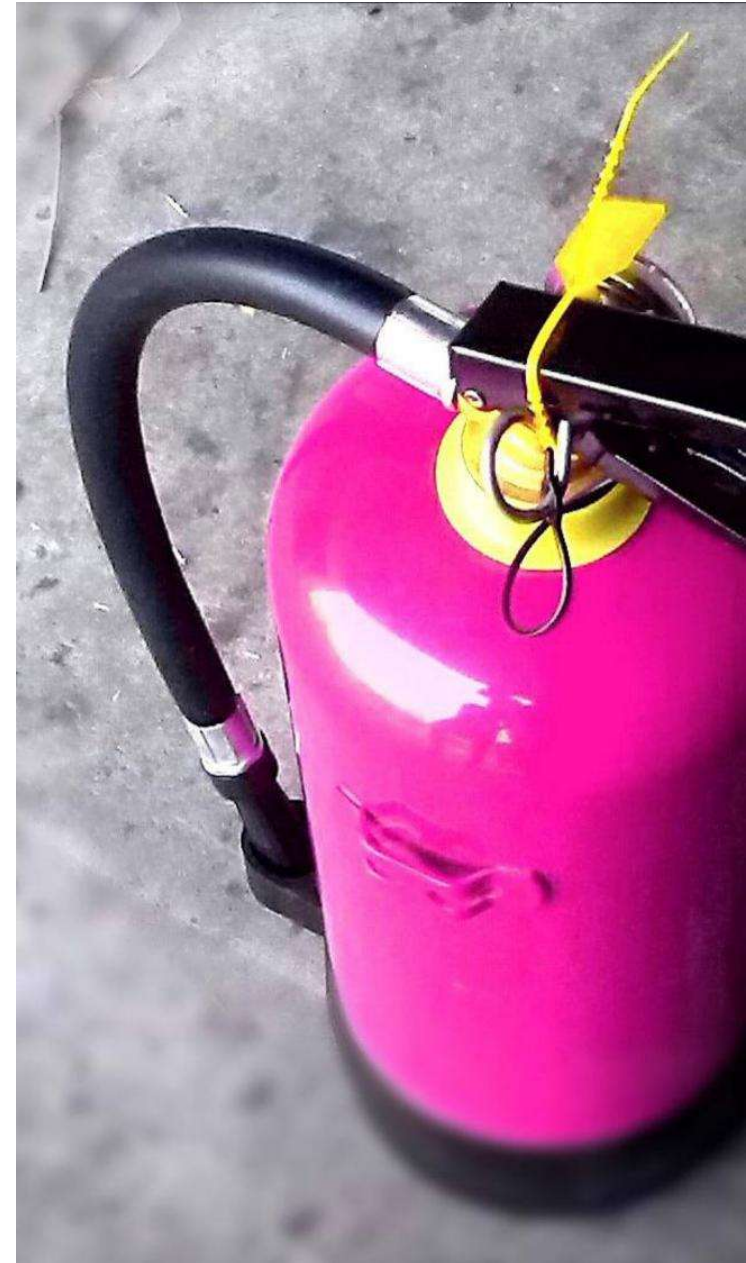
If local laws are more restrictive than the BITMARCK Supplier Code, suppliers must comply with the local laws at least.



Health and Safety at Work

The supplier **is obliged** to act in accordance with the applicable legal and international standards **relating to health and safety at work** and to ensure safe working conditions.

The supplier must take all reasonable measures to avoid and/or reduce risks relating to health and safety at work.



Human Rights and Fair Working Conditions

BITMARCK®

Child Labour

BITMARCK rejects child labour in its supply chain.

Suppliers must avoid any form of child labour in their companies and undertake not to employ any workers who are under the minimum age of 15.

Remuneration and Working Hours

Der The supplier complies with all applicable national laws on working hours, including overtime, breaks and paid holidays. Employees are paid in accordance with local minimum wage laws and applicable collective agreements. The supplier pays employees on time and informs them clearly and unambiguously about the basis on which they are paid (i.e. that employment contracts are written in a language they understand).

Human Rights and Fair Working Conditions

BITMARCK®

Forced Labour

The supplier undertakes not to tolerate any form of slavery, forced labour or human trafficking in its business. This applies not only to all work carried out involuntarily, but also to cases of coercion, and psychological and/or physical threats or abuse.

Freedom of Organisation and Collective Bargaining Law

The supplier undertakes to comply with freedom of organisation and local collective bargaining law within its company.

The supplier's employees must be free to decide, without threat or intimidation, whether to join a trade union/employee representation of their choice or not.

Diversity and Inclusion

The supplier undertakes to create a working environment that enables inclusion and in which the diversity of its employees is valued. It is committed to equal opportunities and does not discriminate against anyone on the basis of gender, ethnic and national origin, race, skin colour, religion, age, disability, sexual orientation or identity, or other characteristics protected by law, and will not tolerate such discrimination.

The Environment

The supplier declares that environmental protection will be considered in all activities. To this end, the supplier undertakes to comply with at least all applicable laws, regulations, and standards as well as international environmental standards relating to environmental protection.

The supplier undertakes to promote the safe and environmentally sound development, manufacture, transport, use and disposal of its products.

It declares that it will use energy-efficient and environmentally friendly technologies and resources and reduce its waste volumes and emissions into the air, water, and soil.



Data protection and information security

The supplier undertakes to comply with the statutory provisions on data protection. **Personal data may only be collected and processed if this is necessary for the performance of the relevant work tasks or when required by law.**

The supplier guarantees that its information systems containing confidential information or data belonging to the BITMARCK Group are **protected against manipulation, loss, or unauthorised access by third parties by means of appropriate technical and organisational measures.**

The supplier undertakes to respect and protect intellectual property rights and trade secrets.



Anti-Corruption and Bribery

The supplier must ensure and comply with applicable laws and international agreements on combating corruption.

The supplier undertakes not to tolerate any form of corruption or bribery, neither directly nor indirectly, and not to offer, grant or promise any benefits to public officials, competitors or (potential) contractual partners to influence official actions or gain an unfair advantage.

Conflicts of Interest

The supplier undertakes to avoid and/or disclose internally and to BITMARCK any conflicts of interest that could influence business relationships and to avoid even the appearance of such conflicts of interest.

This can be done via whistleblower system <https://www.bkms-system.com/bitmarck> or via compliance@bitmarck.de.

Anti-Money Laundering, Sanctions and Embargoes

The supplier undertakes to comply with applicable laws and regulations on combating money laundering.

The supplier undertakes not to promote or engage in money laundering, either directly or indirectly.

The supplier undertakes to comply EU Regulations 2580/2001 and 881/2002 on combating terrorism.

The supplier undertakes to compare its Data with the addresses listed in the sanctions list and not to enter into any contractual relationships with listed persons or companies.

Antitrust Law

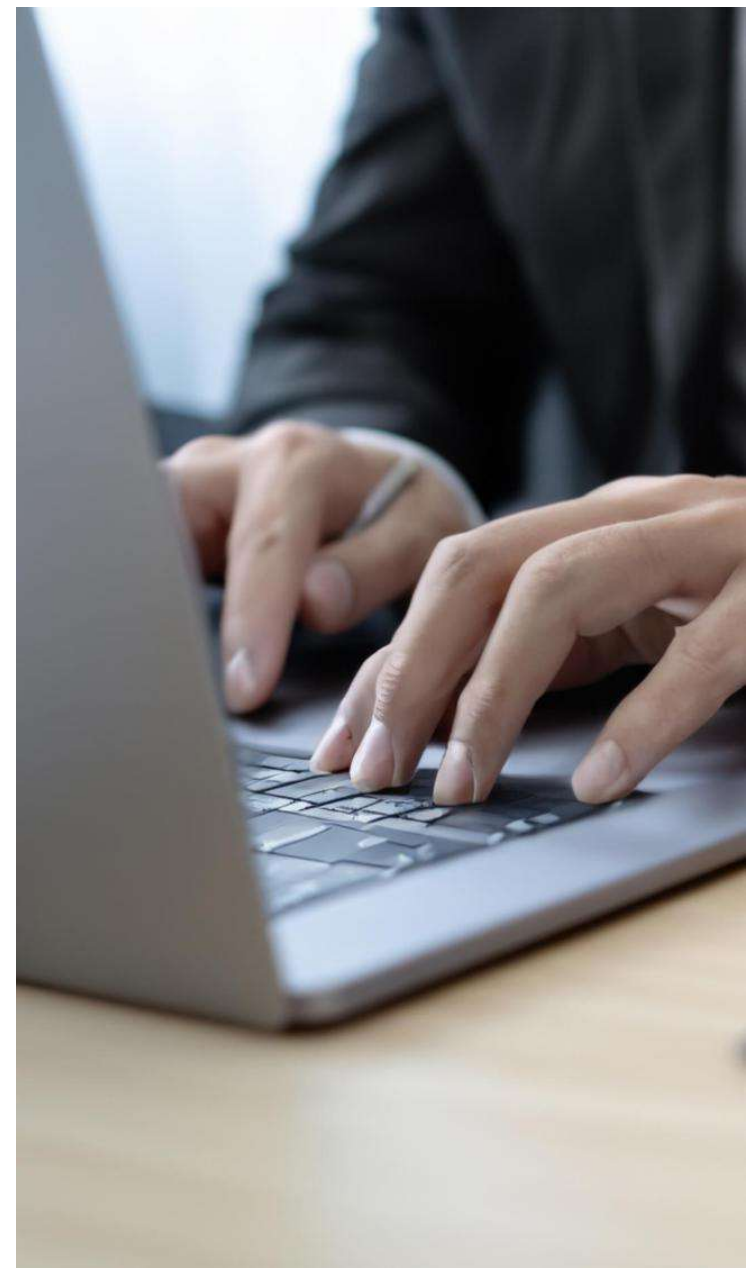
The supplier undertakes to act in accordance with national and international anti-trust laws and not to participate in price fixing, market or customer splitting, market agreements or bid rigging.

Complaints Management

If you wish to report a possible violation of the law or possible irregularities against the provisions of the Code of Conduct for Suppliers, you can contact the BITMARCK Compliance Team directly via our whistleblower system. The System can be accessed via the website <https://www.bkms-system.com/bitmarck>.

The whistleblower system can be used anonymously. The identity of the whistleblower will be kept confidential in accordance with legal regulations.

The supplier undertakes to communicate the information about the complaint to the relevant departments within their company (e.g. sales/purchasing).



Umsetzung und Compliance

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It is important to us that our suppliers familiarise themselves with the contents of the Code of Conduct, understand them and ensure compliance.

This Code of Conduct for Suppliers serves as the basis for all future deliveries and services. **The supplier undertakes to act responsibly in accordance with this Code of Conduct for Suppliers** and to comply with the conditions set out therein.

BITMARCK will verify compliance with the regulations listed in this document **by conducting risk-based audits of suppliers, as necessary**. The supplier agrees that BITMARCK may conduct such audits once a year or for specific reasons to verify compliance with the Code of Conduct for Suppliers during normal business hours giving reasonable advance notice.

As proof of compliance with and implementation of the listed regulations, the supplier may submit existing audit reports, documentation of **the implementation of its own due diligence obligations, and certificates such as ISO14001, 9001, 27001 or Blue Angel**.

We reserve the right to request written confirmation, particularly from suppliers with a significant turnover or in specific cases.

You can acknowledge the following principles or demonstrate your commitment to these principles through your own code of conduct or through appropriate evidence that covers these standards.

This **Code of Conduct for Suppliers is regularly updated and reviewed** to reflect insights from our continuous process of improvement.

The current version of the Supplier Code of Conduct is available on our website here:

<https://www.bitmarck.de/unternehmen/compliance>

Thank you very much

for your attention.

BITMARCK

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