

# **Customer Code of Conduct**

#### **Preamble**

The ComSIT Distribution GmbH and ComSIT Group companies (hereinafter referred to as "ComSIT" or "We") operate in different locations and countries around the world and share the brand ComSIT. Our global presence subjects our business to a wide range of legal regulations and standards. In order to meet the requirements of ourselves, our customers, suppliers and partners, and to continue to build our success, we can never disregard our values and must always do our business in compliance with all laws, regulations and standards, including ethical, social and environmental standards. To conduct business ethically we have defined a minimum of principles to Export, Environment and Social in this Customer Code of Conduct. We expect all of our Customers to adhere to similar principles and replicate them throughout their supply chain.

## **Export**

If the Customer wants to export the goods purchased from ComSIT the Customer will comply with all national and international export control laws, including without limitation in the USA especially by the US Bureau of Industry and Security and the Department of State (including ITAR), in Europe Article 12G of EU Regulation 833/2014 and other applicable regulations, including other participating countries, sanctions, embargoes and other laws, regulation, government orders and policies controlling the transmission or shipment of goods and technology.

Furthermore, the Customer certifies that the goods which are supplied to the Customer by ComSIT, will not be supplied in any way, directly or indirectly via 3rd party organizations to an entity/person in or from Belarus, Iran, North Korea, Russia or Syria, unless otherwise authorized by authorities in the EU, UK, USA or other competent authorities.

The Customer certifies that the goods will not be implemented in products or used with products which are or will be operated contrary to any applicable export control law or regulations, including United Kingdom, European Union, United Nations or United States regulations. The Customer also certifies that the goods will not be used for any unauthorized weapon of mass destruction proliferation activity, including chemical, biological, and nuclear or missile activities restricted by the United Kingdom, European



Union, United Nations, United States, or other applicable regulations.

Furthermore, the Customer certifies not to export, re-export or re-sell items to, or incorporate items in aircraft operated by parties when there are reasons to assume that these might violate the applicable export law regulations.

#### **Environment**

The Customer will comply with all applicable health-, safety- and environmental regulations and establish appropriate organizational structures and procedures for the effective management of associated risks.

The Customer will provide a safe working environment that supports accident prevention and minimizes exposure to health risks to the Customers employees.

The Customer will comply with applicable laws and regulations on environmental protection and will preserve resources and protect the environment as much as possible. The Customer will especially use new technologies to contribute to less emissions and pollution and a more effective use of resources and recycling of waste and products.

## **Social and Ethics**

The Customer will treat all its employees with respect and fairness and will observe basic human rights set forth, for example in the Universal Declaration of Human Rights, including but not limited to the prohibition of forced or child labor, and the provisions of reasonable wages, social benefits, working hours, freedom of association and other fair working conditions in compliance with applicable laws.

The Customer will maintain an environment with no retaliation, free of antidiscrimination and harassment on the basis of gender, age, race, skin colour, ethnicity or national origin, citizenship, religion or religious beliefs, physical or mental disability, veteran status, sexual orientation or any characteristics protected by applicable law.

We do not tolerate any form of corruption, extortion and embezzlement. We expect our Customers to conduct their business in consistency with fair practices in compliance with all applicable antitrust laws.

## Audit

ComSIT reserves the right to verify the compliance with the provisions of this Customer Code of Conduct at the Customers premises in an appropriate manner and upon prior notification and in conformity with the applicable law. ComSIT will treat the information obtained during the audit confidential.



## **Violation of the Code of Conduct**

In the event a violation is discovered, ComSIT reserves the right to take appropriate measures depending on the severity of the violation and the extent of the customer's default. Among other things, ComSIT is entitled under the conditions of § 314 BGB

(German Civil Code), to terminate the contract for good cause, especially breach of the obligation described in section "Export" of this Customer Code of Conduct.

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The Customer hereby confirms, that the Customer has read the above provisions and hereby undertakes to comply with the principles of the above clauses in addition to the obligations arising from the ComSIT General Terms and Conditions.

The Customer will do the best to pass on the contents and principles of these regulations within the supply chain and to persuade them to comply with the basic principles and requirements.