

Supplier Code of Conduct



KING ICT
INFORMATION & COMMUNICATION TECHNOLOGIES



Introduction

KING ICT Ltd. and all its affiliated companies (“KING ICT”) are dedicated to act transparently on the market, with integrity while respecting all domestic and international regulations. With this Code of Conduct, KING ICT aims to ensure that all participants in its supply chain are committed to the same values in their operations.

This Code of Conduct identifies values that are significant to KING ICT, and it is therefore expected that all suppliers in KING ICT’s supply chain respect them. Suppliers are to ensure their application along the entire supply chain of each business transaction with KING ICT. Failure to comply with this code, or business practices that are not in accordance with this code, may result in the termination of any cooperation with the supplier.

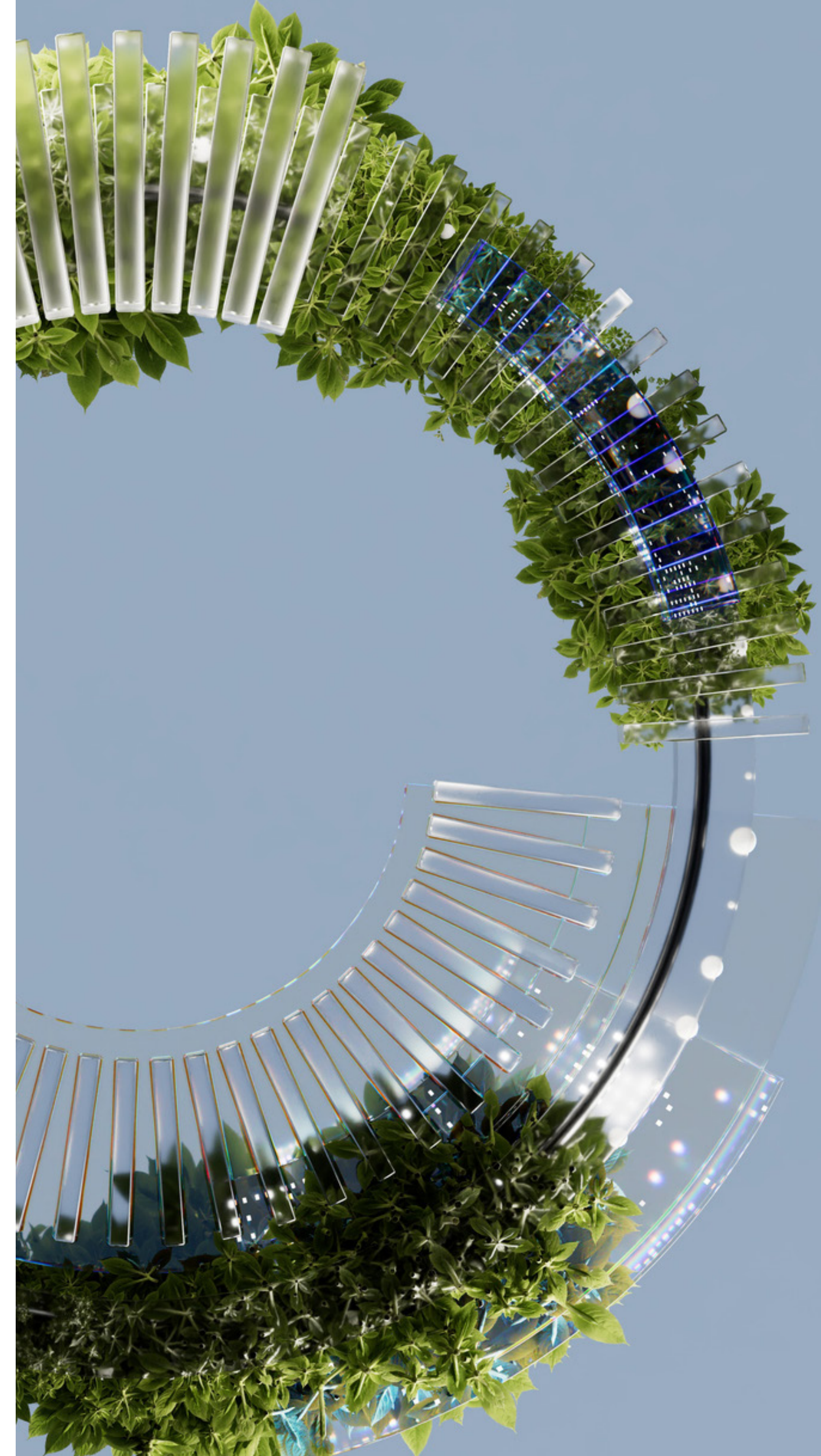
Non-compliance with these rules

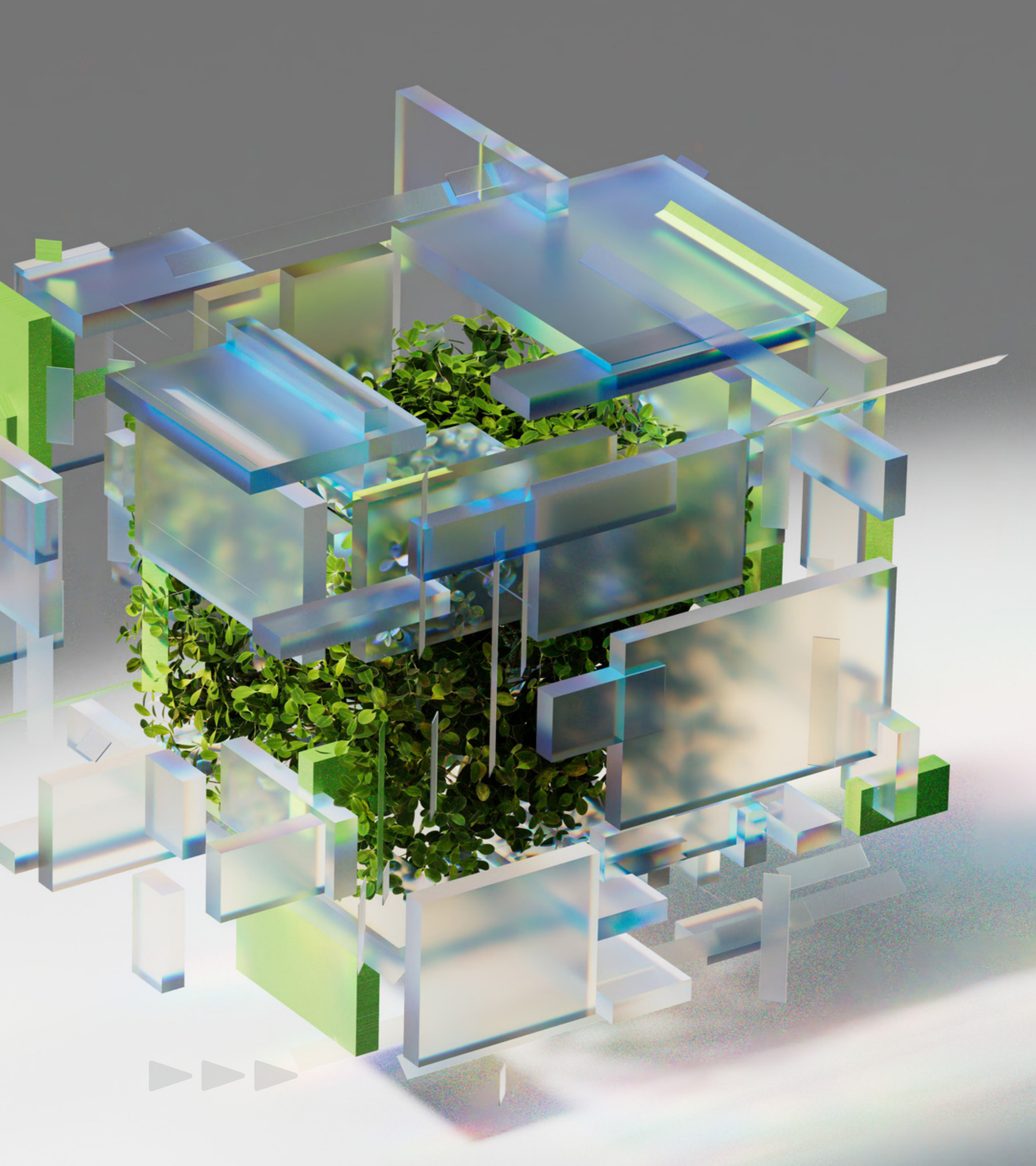
If you notice behaviour that is contrary to this code, you can report non-compliance to our compliance officer at **compliance@king-ict.eu**.

KING ICT reserves the right to terminate the contract with the supplier in case it determines a gross violation of this Code of Conduct.

Should a doubt of non-compliance arise, the supplier has the obligation to provide all necessary documentation and information to prove conformity with these rules, and to ensure that KING ICT or an independent third party conducts a targeted audit at the supplier.

KING ICT reserves the right to verify the practices specified in this Code of Conduct, through announced audits to the supplier, by requesting the delivery of relevant certificates or by requesting the completion of a questionnaire.





Rules of conduct

These rules describe KING ICT's expectations in establishing and maintaining a business cooperation with suppliers and set out minimum standards expected from partners in procurement grouped by the following areas:

1. **Ethics and integrity**
2. **Protection of employees, human rights**
3. **Health and safety protection**
4. **Environment and sustainability**
5. **Security and protection of privacy**

1. Ethics and integrity

KING ICT expects suppliers to comply with all applicable domestic rules and regulations and all European and international legislation directly applicable to their business.

Anti-corruption policy

Suppliers have adopted rules obliging themselves to comply with domestic and foreign anti-corruption regulations (e.g. USA FCPA, UK Bribery Act, Sapin II) and are expected to take measures to prevent bribery and corruption within their operations and in their supply chain.

Bribery

Suppliers prohibit their employees from offering anything of value to any person associated with KING ICT to obtain a business benefit for themselves or anyone else. Anything of value is a form of benefit that includes, for example, cash, gifts, prizes, services, offers of employment, etc.

Conflict of interest

Suppliers ensure that there is no conflict of interest before entering into business with KING ICT and report the existence or doubt of any conflict of interest without delay.

Exports and sanctions

Suppliers align their business activities with European and international sanctions and comply with regulations related to export permits. Suppliers who deliver dual-use goods, i.e. goods for which certain permits are required for further deliveries, undertake to support KING ICT in fulfilling all its obligations according to the applicable regulations.

Whistleblower protection

Suppliers have an established process for reporting irregularities that stresses the protection of the applicant's identity and prevention of negative consequences for the applicant.

Conducting trainings

Suppliers continuously conduct training and education of their employees on these topics, emphasizing their importance and encouraging the ethical behaviour of employees in everyday work.



2. Protection of employees, human rights

Suppliers are expected to fully commit to and comply with labour legislation and legislation on human rights and fundamental freedoms, such as the UN's Universal Declaration on Human Rights, the European Convention for the Protection of Human Rights as well as fundamental labour standards set by the International Labour Organization (ILO).

Prohibition of child labour and modern slavery

Suppliers do not accept any business practices that include modern slavery, forced labour, human trafficking neither within their organization nor in their supply chain. Also, suppliers do not employ persons who do not have a legal permit to work according to the regulations of the country in which they operate.

Safe working environment

As an employer, supplier's priority is to ensure that all its employees feel safe in the workplace and are treated with respect. Any violence in the workplace, whether verbal or physical, threats, corporal punishment, mental coercion, verbal abuse or harassment of any kind, is prohibited and severely punished.

Freedom of association

Suppliers respect employees' rights to join unions and other forms of associations that have goals to protect and promote their members' rights and interests, all under applicable legislation. Employees have complete freedom to join and leave such associations without risk of harassment or intimidation.

Employment in accordance with the laws

All persons employed with the supplier work based on a valid and written employment contract that fully complies with legal regulations and are consequently adequately and regularly paid for their work. Suppliers respect the rights of employees regarding working time, rest and leave, and any use of temporary work or external labour complies with all relevant legal requirements.



3. Health and safety protection

It is expected from suppliers that they provide working conditions under all occupational safety requirements in valid legislation, which, among other things, implies that the supplier has adopted procedures for reducing health and safety risks to contribute on accident prevention and insurance of a safe workplace for everyone.

4. Environment and sustainability

The supplier's organization, depending on its size, capabilities and obligations, adapts its business processes to the requirements of sustainability and environmental protection according to domestic and European or international legal regulations. Also, KING ICT expects suppliers to pass on sustainability requirements throughout their entire supply chain.



5. Security and protection of privacy

Suppliers who cooperate with KING ICT and who come to possess information that they do not own must handle this information carefully, without disclosing it to unauthorized persons without the prior approval of KING ICT.

Information security

Suppliers align their business operations with the need to protect the confidentiality, integrity, and availability of information. At all times, the required level of information security and control provided by suppliers must be commensurate with the sensitivity, value, and criticality of the information being processed during its life cycle.

Protection of personal data

Any processing of personal data performed by the supplier providing its services to KING ICT is carried out under relevant regulations on personal data protection, which the supplier interprets and applies with due care. The supplier is expected to have established business processes by which it takes all necessary measures to protect personal data from unauthorized use by any third party.

Confidential information

Suppliers sign contracts in which they undertake to keep secret and confidential all information they learn during cooperation with KING ICT. If certain certificates are expected for the services ordered, the supplier ensures them all before providing the service.

