



# *Code of Conduct* **for Suppliers.**

Hutchison Drei Austria GmbH  
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## 1. We live Responsibility.

With business growth also comes great responsibility: towards the environment, society, our own employees and the future of us all. As a leading Austrian telecommunications company, it is far from enough for us to simply comply with legal regulations. We want to go a big step further, set ourselves the high goals and actively drive social change, including digital inclusion.

Therefore, Hutchison Drei Austria is committed to engage in business ethically and responsibly with respect to environmental protection. Hutchison Drei Austria believes that its suppliers play an important role in helping the company achieve its goals and we must work together to create a safe living environment for all people and advance environmental protection.

## 2. Document Purpose and Scope.

Hutchison Drei Austria (further referred to as „Drei“) works with many business partners as well as product and service providers (further referred to as „business partners and suppliers“) who meet high standards and quality requirements.

The focus of compliance, and the central theme around which most of our policies, procedures and controls revolve, is integrity – an overarching concept that captures the fight against corruption and bribery. To demonstrate its commitment to stakeholders and to minimize the damaging impact of these issues on business and society, Drei is committed to maintaining a zero-tolerance attitude towards fraud and corruption. Additionally, Drei encourages an environmental performance, social well-being, and governance (“sustainability”) practices amongst its business partners and suppliers.

Drei has implemented a comprehensive risk management system (see point 4) that meets all the necessary due diligence obligations. The present Code of Conduct represents an integral part of the business relationships with our suppliers, which ensures compliance with human rights standards and environmental protection in the procurement processes.

The principles of the CoC are binding as soon as and if a business relationship exists between Drei and its suppliers. It is expressly pointed out that compliance with the CoC requirements does not release suppliers from further legal obligations.

The content of this CoC has been developed considering several international regulations and organizations. These include the General Data Protection Regulation (GDPR), the EU NIS2 Directive, the Digital Operational Resilience Act (DORA), the European Supply Chain Directive (CSDDD), the United Nations Global Compact (UN GC), the International Labour Organisation (ILO) and the United Nations Sustainable Development Goals (UN SDGs). Drei is committed to helping achieve our goals set out in the Climate Strategy through a set of science-based targets (SBTi).

## 3. Commitment.

Drei works with a wide range of business partners and product and service providers who meet its standards and quality requirements. Drei motivates and supports its suppliers to continuously improve their sustainability standards and practices, while respecting local traditions, cultures and norms.

As a business partner or supplier, you ensure that the requirements of this CoC are communicated to your company employees, agents, subcontractors and suppliers and are responsible for any non-conformity actions.



## 4. Supplier Risk Assessment and Audits.

As part of our commitment to ethics and sustainability, we regularly identify and assess actual and potential negative impacts on human rights and the environment of our operations, including our business partnerships along the value chain. Our risk analysis focuses not only on the impact of human rights and environmental risks on our business success, but also on the potential negative effects on affected persons or groups of people, the environment and society.

Drei expects its suppliers to periodically review their own compliance and their suppliers for compliance with the principles of this CoC and to communicate their compliance status upon request by Drei. If non-conformity with the objectives of this CoC is determined, Drei expects suppliers to take appropriate measures immediately to avoid potential negative impacts on human rights, the environment and other protected interests defined in this CoC. Drei strives to find a solution to correct the situation together with those involved.

For this purpose, Drei reserves the right to have supplier audits carried out at any time in consultation with the suppliers or business partners within the framework of the contractual agreements.

## 5. Quality Assurance of Solutions and Products, Intellectual Property.

### • Quality assurance of solutions and products

The principles of quality assurance are integrated into Drei's overall strategy. We can only meet our customers' expectations in terms of quality and productivity by consistently pursuing our goal of error-free operation, together with our suppliers' adherence to a quality policy. The prerequisite for this is reliable control of procedures and processes from product development to ongoing delivery.

### • Intellectual property

It is imperative that all our suppliers acknowledge and respect intellectual property, which includes both international and national copyrights, patents, utility models, trademarks and designs. Suppliers must ensure that all their products and services do not infringe the rights of third parties in this context. Drei expects its suppliers to foster innovation while respecting the intellectual property rights of others.

## 6. Promoting Ethical Standards.

Drei expects its suppliers to act according to the highest standards of ethical behavior and to always act professionally.

### • Legislation and Policies

Suppliers and business partners shall comply with all laws, legislation, regulations, and directives relevant to its business and in relation to any goods and services it provides to the Drei.

### • Trade control

Suppliers of telecommunications companies must comply with these trade controls for several reasons: security and national interests, compliance with international agreements, economic sanctions, quality and interoperability standards.

### • Anti-Corruption

Suppliers and business partners are obliged to avoid all forms of corruption, such as bribery and improper granting or acceptance of advantages. Suppliers must ensure that their business practices are fully transparent when necessary and comply with applicable anti-corruption laws and regulations.

### • Conflict minerals and critical materials

Suppliers and business partners shall ensure that materials are not sourced through illegal or unethical practices, which includes any products, components or materials that contain conflict minerals: tin, tungsten, tantalum, gold from conflict-affected and high-risk areas.



#### • **Data privacy and security**

Our suppliers and business partners must take active protective measures to protect the confidentiality, integrity, and availability of all information and data used in a solution on behalf of Drei.

Our suppliers and business partners must comply with all applicable laws and regulations for data, privacy, and security, including but not limited to those mentioned in Section 2. They must implement appropriate technical and organisational measures to ensure that the information and data to which they have access or which they are in their possession are adequately controlled.

#### • **Whistleblower**

The Drei whistleblower box has created a web-based whistleblower system. It is available to our employees, business partners, suppliers and all other affected parties who are exposed to an adverse impact, regardless of time and place. You can use this portal to report possible violations anonymously or by name. These may include violations of applicable laws, as well as Drei's business and conduct principles or internal company policies.

## 7. Human Rights, Modern Slavery and Human Trafficking.

Suppliers and business partners shall comply with internationally recognized human rights standards and avoid any kind of human rights violations. Suppliers shall respect the personal dignity, privacy and rights of each individual. Forced labour, torture and child labour are prohibited in any form. In addition, the supplier or business partner complies with all International Labour Organization (ILO) conventions relating to labour standards and conventions.

Drei is committed to acting ethically and with integrity in all business relationships, and to applying and enforcing effective systems and controls to ensure the non-use of child or forced labor, all forms of slavery, and human trafficking so that they do not occur in any of its supply chain.

## 8. Protecting the Rights of All Employees.

To protect the rights and dignity of all parties involved in the value chain, all Drei suppliers are required to adhere to the principles detailed below:

### 8.1 Health and Safety Principles:

- Ensuring a fair and equitable work environment that is free from any form of harassment or discrimination, including but not limited to age, racial or ethnic origin, disability, gender, nationality, marital status, sexual orientation, political beliefs or trade union membership.
- Providing a safe work environment in accordance with all applicable health and safety requirements and to prevent and minimize any health risk or harm to employees.
- Complying with all laws and ILO standards regulating minimum wage payments and working hours. In the absence of legal regulations on minimum wages, salaries should be set at a level that ensures an adequate standard of living.
- Implementing clear and consistently applied disciplinary measures and grievance procedures, including the prohibition of any form of corporal punishment and mental, physical, sexual, psychological, or verbal abuse.
- Ensuring that employees are granted freedom of association and the right to collective bargaining. Where no legislation on collective bargaining exists locally, appropriate channels for discussions and remedies for work-related conflicts should be provided.

## 9. Operating Responsibly.

Drei encourages its suppliers to consider the risks to their business activities from climate change and actively minimize their environmental impact. Drei is committed to the achievement of its science-based greenhouse gas emissions reduction targets. As such, it prioritizes suppliers that also have commitments to a science-based target and/or a greenhouse reduction plan.



Drei encourages its suppliers to incorporate the following principles into their environmental policy agenda:

- Comply with all relevant local and national environmental laws in a way that ensures environmental protection, including the protection of natural resources and biodiversity.
- Tracking greenhouse gas emissions in accordance with Scope 1, 2, and 3 or the variables required for calculating GHG emissions (e.g., Carbon Disclosure Project or an alternative platform).
- Minimizing energy consumption and the carbon footprint of operational activities using renewable energy sources.
- Managing environmental risks and impacts through environmental policies and management systems.
- Promote the use of environmentally friendly technologies that can reduce energy consumption, minimize the need for business travel and reduce dependence on resources such as paper.
- Increasing the use of eco-friendly, recycled, and/or sustainably sourced products.
- Promoting the circular economy in its own operations and with business partners.
- Promote recycling of waste while taking possible measures for reducing waste when.

With the request to sign this Code of Conduct for Suppliers with name and date.

.....  
Name of the signatory in block letters

.....  
Date, company signature