

Third Party Code of Conduct

For ecotel Business Partners

ecotel communication ag
Prinzenallee 11
40549 Düsseldorf



Public

Responsible party: ecotel Compliance
Author: ecotel Compliance
Version: 1.0

Status: December 2025
Scope: ecotel business partners
Document status: (r)leased



Introduction

Why this Code of Conduct?

At ecotel, we believe that **economic success** and **responsible, ethical conduct** go hand in hand. We are committed to fair **working conditions, the protection of human rights and the environment**, as well as to **respectful interactions** – and we expect the same from our business partners.

This Code of Conduct is based on international standards such as the [UN Guiding Principles on Business and Human Rights](#), the [OECD Guidelines for Multinational Enterprises](#) and the [Core Labor Standards of the ILO](#). It describes what is important to us – and what we expect from our **partners**.

To whom does it apply?

These guidelines apply to all who collaborate with ecotel:

- Suppliers
- Service providers
- Consultants
- Sales representatives

We kindly ask you to accept these principles as a minimum standard and to align your actions accordingly. This also means: You comply with all applicable laws and take responsibility for your daily actions.





Contents



Human Rights & Working conditions

.....

Respect for Human Rights

.....

Prohibition of Child Labor

.....

Youth Protection

.....

Employees

.....

Prohibition of Forced Labor and Modern Slavery

.....

Fair Working Conditions

.....

Freedom of Association and Collective Bargaining

.....

Health and Occupational Safety

.....

Prohibition of Discrimination



Environment & Sustainability

.....

Protection of Natural Resources

.....

Prohibition of Hazardous Substances

.....

Waste Disposal

.....

Product and Packaging Materials

.....

Procurement of Conflict Minerals

.....



Integrity & Trust

.....

Anti-Corruption

.....

Fair Competition

.....

Protection of Confidential Information and Intellectual Property

.....

Protection of Whistleblowers

.....

Data Protection and Information security

.....

Insider Trading

.....

Responsible Handling of Artificial Intelligence

.....

Advancing together

At ecotel, we believe in open, collaborative partnerships. If you have any questions, suggestions or concerns, please feel free to contact us. You can reach our Compliance department at: compliance@ecotel.de

Thank you for joining us on this journey!



Human Rights & Working Conditions

ecotel and its business partners share responsibility for **respecting human rights** and **ensuring fair working conditions** throughout the **entire supply chain**.

We expect our partners to respect the **dignity of every individual, to ensure a safe and fair working environment**, and to **eliminate discrimination, exploitation, or abuse in any form**.

In this context, it is important to note that all employees – regardless of origin, gender, religion, age, or function – are to be treated **equally and with respect**.

The following principles specify these expectations and serve as a **binding framework** for responsible action.

Respect for Human Rights

Our business partners respect internationally recognized human rights and actively work to protect them. They ensure that they do not contribute to human rights violations and tolerate no behavior that undermines these principles.

Prohibition of Child Labor

Any form of child labor is strictly prohibited. Our partners comply with [ILO Convention No. 138](#) and the applicable national laws. No child younger than the legally established end of compulsory schooling - and in any case younger than 15 years - may be employed in our supply chain. Minors in employment must be particularly protected to ensure their health, safety, and development.

Youth Protection

For employees under 18 years of age, the worst forms of child labor as defined in the [ILO Convention No. 182](#) are strictly prohibited. This includes, among other things, slavery, exploitative activities, and work that endangers their health or safety. Their working hours must not conflict with recognized training programs.

Prohibition of Forced Labor and Modern Slavery

Our business partners reject any form of forced labor, slavery, or oppression. Employment must always be voluntary. Employees have the right to terminate their employment relationship in accordance with legal or contractual notice periods. The retention of identification documents is prohibited.



Fair Working Conditions

All employees must be clearly and understandably informed about their rights and working conditions. This includes wages, working hours, vacation and more. Where legally required, written employment contracts must be concluded. The remuneration must at least correspond to the statutory minimum wage or collectively agreed standards and enable a dignified life. Wages are to be paid punctually, in full, and in the legal currency. Unlawful wage deductions, particularly as a form of punishment, are prohibited.

Legal regulations regarding working hours, breaks, vacation, and protection needs – such as in cases of pregnancy or disability – must be adhered to. Overtime may only be performed voluntarily or on a contractual basis.

No one shall be subjected to degrading treatment, violence, harassment, or intimidation in the workplace. Disciplinary measures must be carried out in accordance with the law.

Freedom of Association and Collective Bargaining

Our business partners respect the right of employees to organize themselves in trade unions or to join works councils in accordance with local laws. Employee representatives are granted access to the workplace, and open communication regarding working conditions must be possible. Intimidation or retaliation is not acceptable.

Health and Occupational Safety

Our business partners meet at least the local requirements for occupational safety and health protection. They implement an appropriate management system, e.g. according to ISO 45001.

Occupational accidents and health risks must be avoided through safe working conditions and appropriate protective measures. Workplaces must be well-lit, ventilated, and tempered. Access to drinking water, clean sanitation facilities, and medical care must be ensured.

Appropriate working hours and rest breaks must be granted.

Prohibition of Discrimination

Our business partners create a work environment free from discrimination. All employees are treated with respect and dignity – free from racism, sexism, religious intolerance, bullying, or any other form of harassment.

No one shall be disadvantaged based on origin, gender, age, disability, religion, sexual orientation, or any other protected characteristics. This also applies to equal pay for equal work. In the event of known discrimination, legally permissible countermeasures must be taken immediately.





Environment & Sustainability

ecotel is part **of international supply chains** and regards environmental protection as a **global responsibility**. We are actively committed to this and wish to motivate our business partners to contribute as well.

The development and use **of environmentally friendly technologies** is of particular importance to our industry. Our business partners commit to **complying with all applicable environmental and energy standards**.

Protection of Natural Resources

Our business partners handle natural resources responsibly. They avoid harmful interventions such as soil contamination, water pollution, air pollution, excessive noise, or water consumption that could endanger the environment and natural resources.

Prohibition of Hazardous Substances

Our business partners comply with all relevant national and international regulations regarding prohibited or restricted substances as well as their labeling. They keep themselves informed about changes to these regulations and implement them consistently.

Waste Disposal

Waste is disposed of by our business partners in a professional manner and as environmentally friendly as possible. Recycling is to be preferred wherever possible. The disposal of wastewater is carried out in accordance with the applicable legal regulations.

Product and Packaging Materials

All delivered products and services must comply with the legal, technical, and contractually agreed quality and safety standards. They must be safe and suitable for use.

Prohibited materials may not be used in products, packaging, or production processes. The labeling obligations for recycling and disposal as well as for hazardous substances are complied with.

Procurement of Conflict Minerals

Our business partners source materials responsibly and ensure that they do not procure conflict minerals from regions where their extraction finances armed groups or violates human rights. They fulfill the applicable due diligence obligations and ensure transparency in their supply chain.



Integrity & Trust

ecotel places great importance on **lawful, ethical, and transparent conduct** – both within its own company and with its business partners. Integrity is the foundation for trustworthy business relationships and sustainable success.

Our business partners therefore commit to complying with all applicable laws and standards – particularly in the areas of **anti-corruption, fair competition, data protection, confidentiality**, as well as in the handling of **sensitive data and technologies**.

Anti-Corruption

ecotel rejects any form of corruption. We expect the same from our business partners – namely, the strict rejection of bribery, fraud, extortion, theft, and other dishonest practices. Also, so-called 'acceleration payments', illegal cash flows, or other benefits intended to influence decisions are impermissible – regardless of whether they are made to private individuals, companies, customers, or authorities.

Contributions such as invitations, promotional gifts, donations, or sponsorships may only be made within the legally permissible framework. Our business partners should implement appropriate internal processes to prevent corruption and to respond adequately in cases of suspicion.

Fair Competition

ecotel stands for fair, transparent, and ethical competition.

We expect our business partners to comply with all applicable competition and antitrust laws and to refrain from entering into anti-competitive agreements or abusing dominant market positions.

Protection of Confidential Information and Intellectual property

Our business partners respect and protect intellectual property rights and treat confidential information from the business relationship with the utmost care.

Technological or commercial information that is not publicly known may neither be disclosed nor published or otherwise used without authorization.

Protection of Whistleblowers

ecotel expects that business partners take measures to protect whistleblowers. The possibility for anonymous and confidential reporting of misconduct must be accessible and transparent. Employees must not experience any disadvantages as a result of such reporting.



Data Protection and Information Security

Our business partners must carefully protect personal data of employees, customers, and suppliers, and comply with all applicable data protection laws.

In doing so, they shall follow recognized standards such as ISO 27001 and ISO 27032 for information and cyber security.

Insider Trading

ecotel expects that business partners do not misuse insider information.

Information that could influence the price of securities or financial instruments and are not publicly known may neither be disclosed nor used for one's own trading decisions.

Responsible Use of Artificial Intelligence

Our business partners should act responsibly when using artificial intelligence and ensure that no discriminatory or unfair results arise. Appropriate measures must be taken to uphold ethical standards.



