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Supplier Code of Business Conduct Of IPKO Telecommunications LLC

1. BUSINESS COMPLIANCE

IPKO Telecommunications LLC (hereinafter: the Company) strive for attainment of the highest ethical and business standards.

Supplier Code of Business Conduct of IPKO (hereinafter: the Code) lays down the main principles and standards for the suppliers of goods, providers of services and other business partners (hereinafter jointly referred to as: Suppliers) of the Company in accordance with internal company regulations.

During its business, the Supplier undertakes to comply with all applicable national and international regulations. Furthermore, the Supplier shall endeavour to respect the highest ethical and business



standards in line with the provisions and guidelines of this Code. Subject to the scope and field of business, the Supplier further undertakes to set up and maintain a suitable system for monitoring business compliance.

The Supplier further warrants that its own suppliers and contactors will comply with the same commitments and endeavours as stipulated by the previous paragraph (responsibility for the entire supply chain).

2. RESPECT OF FUNDAMENTAL HUMAN RIGHTS OF EMPLOYEES

The Supplier undertakes to protect fundamental human rights of its employees, and to comply with the applicable labour law, and esp. to:

- Provide employees with a working environment free of all forms of discrimination or harassment due to gender, skin colour, age, health condition, religious, political or other convictions, national and social background, financial situation, sexual orientation or other personal background;
- Respect the personal dignity, privacy and other individual's rights;
- Comply with the prohibition of child or forced labour. The Supplier undertakes not to employ persons under the age of 15.
- Provide employees with fair remuneration subject to statutory provisions concerning minimum wage, and social benefits pursuant to applicable legislation, including the payment of outstanding obligations to contractors within the statutory or contractual deadlines;
- Comply with statutory provisions concerning the calculation and payment of employee's social security contributions and other tax payables;
- Respect restrictions concerning the duration of working time, including overtime work, applicable in the relevant country;
- Recognise the employee's right to free association and collective bargaining.

3. OCCUPATIONAL HEALTH AND SAFETY

Supplier is responsible for the occupational health and safety of its employees, and shall set up relevant organisational processes to ensure compliance in the field of occupational health and safety. The Supplier shall identify and assess safety and security risks, and adopt relevant measures for their prevention. Furthermore, the Supplier informs the employees on any safety and security risks and provides them with relevant training regarding the correct and safe conduct, and relevant safety measures.

4. ENVIRONMENT

The Supplier shall act in compliance with applicable law and international standards with respect to environmental care. Accordingly, the Supplier shall seek to reduce pollution and strive for continuous improvement. Manufacturing processes must be designed as to prevent adverse environmental impact and preserve natural resources to the maximum possible extent.

5. BUSINESS CONDUCT

Compliance with competition law

- Supplier shall comply with relevant national and international competition protection regulations that govern both the abuse of a dominant position, as well as all other conduct aiming to limit or limiting competition. The Supplier shall not engage in any price-fixing agreements, market, customer or purchase channel sharing, nor shall the Supplier coordinate its offers with its competitors.

***Conflict of interests***

- Supplier shall avoid and remedy situations that constitute a conflict of interests, which could adversely impact business relations.

Corruption

- Supplier shall comply with the highest integrity standards in all its business interactions. It shall comply with the applicable anti-corruption legislation and refuse all forms of bribery or other forms of corruption.

Money laundering and financing of terrorism

- Supplier shall comply with applicable law regulating the prevention of money laundering and financing of terrorism, and shall adopt relevant measures to prevent any such money laundering or financing of terrorism.

Compliance with tax regulations

- The Supplier shall always comply with applicable national and international regulations concerning taxes.

Trade secret, data protection, and intellectual property

- The supplier shall maintain the confidentiality of all trade secrets, and shall handle confidential information and data in accordance with the required and permitted scope, and in a manner, preventing the disclosure of any such information and data to third parties.
- The Supplier shall always comply with applicable national and international regulations governing the protection of personal data and intellectual property.

6. VIOLATIONS OF SUPPLIER CODE

Compliance with Code's provisions is essential for the business relation between the Company and Supplier. The Company withholds the right to verify the compliance of Supplier's conduct with the Code. In case the Company finds that the Supplier violates the Code, it can, regardless of the other contractual provisions between the parties, cancel contractual cooperation without notice.

The Code shall be published on the Company's intranet and internet site, and shall apply as of 1 January 2019.