



# Supplier Code of Conduct

## Preamble

Awin is a global affiliate network, part of the Axel Springer and United Internet Groups. Axel Springer is a media and technology company with units, investments, and licenses in more than 40 countries that provides information services through our diverse media brands (including BILD, WELT, INSIDER, POLITICO) and classified portals (StepStone Group and AVIV Group) to help people make free and informed decisions in life.

We bear a special responsibility for our actions as employees and managers. We apply high standards to our own actions. We also expect that others maintain high ethical standards.

We are committed to responsible corporate governance. This is fundamentally based on integrity and lawful conduct. For us, this also includes a commitment to an environmentally friendly, liveable and free future for current and future generations.

At Awin, we respect the values of the [Universal Declaration of Human Rights](#) and are committed to good corporate governance. We are committed to complying with internationally recognised social standards and, in particular, protecting the legal positions set out in the [German Supply Chain Due Diligence Act](#) and in other local requirements, for example in the UK Modern Slavery Act 2015. The [UN Global Compact](#) and the [core labour standards of the International Labour Organization](#) (ILO) serve as a basis for this Supplier Code of Conduct. We also support the [UN Guiding Principles on Business and Human Rights](#) and strive to incorporate them into our own policies and processes.

The [Axel Springer Code of Conduct](#) applies to all employees throughout the Group and is an expression of this endeavour. It is implemented within the Awin group by way of the Awin Employee Code of Conduct. We also expect our business partners to observe these principles. In order to guarantee human and labour rights as well as environmental protection, our suppliers must commit to protect the legal positions set out in the Supply Chain Due Diligence Act and in further applicable local legislation (e.g. UK Modern Slavery Act 2015) and agree to our minimum requirements for our business partners set out in this Supplier Code of Conduct. The proper implementation of, and compliance with, our Supplier Code of Conduct is a prerequisite for successful collaboration with Awin and Axel Springer Group companies regardless of less restrictive locally applicable laws and regulations. If there are any contradictions between the Awin Supplier Code of Conduct and local legal requirements, our business partners must inform us immediately.

For purposes of the Awin Supplier Code of Conduct, “business partners” include all third parties that act for, on behalf of or together with Awin, including but not limited to suppliers, sales partners, publishers, affiliates, consultants, brokers, subcontractors, commercial agents, and freelancers.

## Social responsibility

### Human rights

**Our business partners respect the dignity of each and every individual**

Just as we do at Awin, our business partners must respect and support compliance with internationally recognized human rights and emphasize that everyone, without exception, is entitled to the rights and freedoms proclaimed in the [United Nations Universal Declaration of Human Rights](#). They ensure that high human rights standards apply within their company, but also with their direct suppliers.

Tolerance of different opinions and a commitment to democratic principles and the rule of law are the basis of our collaboration.

### Interaction with each other

**Our business partners create a respectful working environment - discrimination and harassment have no place**

Our business partners do not tolerate discrimination of any kind. Everyone has the same opportunity to develop and advance. In particular, national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief and marital status play no role in business or employment decision-making.

Our business partners commit to ensuring a trusting and respectful work environment that does not tolerate sexual or other forms of harassment, discrimination, bullying, or intimidation in the workplace.



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## Social responsibility

### Protection of children

**Our business partners are committed to the effective abolition of child labour**

Our business partners are prohibited from employing children or young people in violation of the law. Where it is permitted to employ children and young people, our business partners must ensure it is not detrimental to their physical and mental development. Their safety and health must be protected by appropriate measures.

### Fair working conditions

**Our business partners ensure fair working conditions**

We require our business partners to act in accordance with the law and observe appropriate social and legal standards.

Wages and salaries as well as social benefits provided must meet or exceed the respective national statutory minimum standards. Working hours must also comply with applicable laws, industry standards or [the core labour standards of the International Labour Organization \(ILO\)](#) at our business partners. Our business partners shall ensure that there is no unequal treatment. For the purposes of this Supplier Code of Conduct, unequal treatment exists if unequal remuneration is paid for work of equal value.

Furthermore, our business partners must respect the right of employees to set up an association to represent their interests and to join and be actively involved in it. The exercise of these rights must not lead to discrimination or retaliation against the employee.

Any form of forced labour, i.e., any work required of a person against their will and under threat of punishment, as well as forms of modern slavery and human trafficking, is strictly prohibited. All employees must have the freedom to terminate their employment relationship with reasonable notice.

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### Workplace safety

**Our business partners ensure health in the workplace**

Awin requires its business partners to take the required measures at all places of work to prevent work-related accidents and illnesses, whether physical or mental in nature by implementing adequate safety standards in the provision and maintenance of the workplace and work equipment.

If private or public security forces are employed to protect a business project, our business partners must ensure that the fundamental rights of the workers are respected through instruction and monitoring. Specifically, business partners are required to commit to a ban on torture and cruel, inhuman or degrading treatment, as well as injury to life and limb. Furthermore, the freedom of association and the freedom to organize must not be impaired.

## Data & IT

### Data protection

**Our business partners protect data**

Data protection laws protect personal data (e.g., name, e-mail address, address, date of birth) and therefore the privacy rights of individuals which might include customers, users, business partners, and employees. All parties involved must handle this data responsibly and observe the data protection requirements and the principles for processing personal data set out therein. When collecting, storing, transferring or otherwise processing personal data, our business partners shall exercise the utmost care and strict confidentiality, and comply with applicable laws and regulations on data protection and data security. More specific data protection requirements are set out in the agreements with our suppliers.

### Information security

**Our business partners deal with cyber risks in a responsible way**

Having reliable information security is crucial for the trust we place in our business partners. The data processed by Awin holds significant value, but it is also susceptible to unauthorized duplication and distribution. Each of our business partners are required to take appropriate security measures to ensure this data is adequately protected against cyberthreats such as destruction, theft, unauthorized access, unlawful disclosure, or other misuse. In the event of a security incident impacting personal information, our business partners promptly inform affected parties as required by local legislation. We contractually define further specific requirements directly with our suppliers.



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## Compliance with laws

### Prevention of corruption

#### Good business is important - but not at any price

Our business partners are prohibited from engaging in bribery in their dealings with public officials and in business dealings. Business decisions must be made on transparent and objective grounds in the interests of the company and avoid even the mere appearance of undue influence, for example, by accepting perks or other benefits. Our business partners must be fair, correct and transparent toward partners and business contacts.

Our business partners must not accept gifts or other benefits (e.g., invitations) that could influence their business decisions. Equally, they are prohibited from offering benefits in order to influence their business partners or other contacts to their advantage.

### Antitrust law

#### Fair competition and free market economy are the cornerstones of our economy

At Awin we promote effective competition as standard practice. Each business partner must ensure antitrust law does not enter into agreements or other arrangements with competitors, suppliers or other companies that impede fair competition. Practices such as price agreements, market-sharing agreements (e.g., by dividing them by sales territories, customer, or product) and agreements on other market practices and business strategies are strictly prohibited. Our business partners must not unfairly call for a boycott and shall prohibit discrimination against competitors, either in the sale or purchase of goods and services.

### Conflicts of interest

#### Our business partners report potential or actual conflicts of interest

Conflicts of interest can mean that business decisions are no longer made impartially. Therefore, our business partners are required to disclose potential or actual conflicts of interest in a timely manner and to resolve them promptly.

### Foreign trade law and money laundering

#### Terrorist financing and money laundering are prohibited

Our business partners must observe all relevant economic sanctions and comply with all restrictions imposed under foreign trade law. Business with individuals, companies or organizations associated with terrorism or drug trafficking, or whose funds are derived from criminal activities, will not be tolerated.

### Protection of confidentiality

#### Our business partners protect business secrets

Our business partners are held to the highest level of confidentiality. All information and documents not suitable or intended for disclosure to third parties are treated as confidential and are protected from unauthorized access and misuse.

### Insider trading

#### Insider information is not used for personal gain

Important information for the capital market may result from a collaboration between Awin, Axel Springer and our business

partners. Business partners in possession of confidential information capable of significantly influencing the share price of listed companies in which Awin or Axel Springer maintains a stake or is considering taking a stake or the price of financial instruments that are linked to the share price of such companies ("insider information") if it were to become publicly known may not buy or sell such securities or disclose such information without express authorization.

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## Humans & Nature

### Sustainability

#### Committed to the environment

Axel Springer has set ambitious climate targets. Among other things, we intend to be climate-neutral and to reduce our carbon footprint in the long term. Sustainability is a key corporate value. Our business partners should also set targets and take appropriate measures to avoid or mitigate environmental risks. At all stages of production, we expect our business partners to adopt eco-efficient technologies and materials that protect the environment, conserve natural resources, and promote recyclability and sustainability. We expect that reasonable efforts will be made to avoid or minimize the consequences of accidents that may have a negative impact on the environment.

We use natural resources sparingly and promote the sustainable use of natural resources. Our goal is to minimize the impact of our activities on humans and the natural world. We also expect this attitude from our business partners. Land, forests, and waters that serve as a person's livelihood may not be unlawfully cleared or taken away for the purpose of acquisition, construction, or other use.

Our business partners shall avoid harmful soil changes, water pollution, air pollution, harmful noise emissions, and excessive water consumption that significantly affect the natural basis for food preservation and production, deny or impede access to clean drinking water and sanitation, or destroy or harm health. We require our business partners to comply with the [Minamata Convention on Mercury](#), the [Stockholm Convention on Persistent Organic Pollutants](#), and the [Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal](#).

## Implementation

### Responsibility of our business partners

We make the Awin Supplier Code of Conduct part of the contractual agreements with our business partners. Our business partners are required to ensure the implementation of and compliance with our Supplier Code of Conduct in the contractual relationship with Awin. In this context, our business partners pass on the Supplier Code of Conduct to all employees who do work for us and work towards compliance. We require our business partners to pass on these requirements to their business partners that are associated with the goods or services provided to Awin (e.g., as subcontractors) and ensure the compliance thereof. We reserve the right to audit compliance with the Supplier Code of Conduct. For this purpose, our business partners must provide information in response to inquiries and, if necessary or if risks are identified on the part of Awin, actively cooperate in the development of remedial measures. If necessary, our business partners will provide insight into documentation and operating processes for the purpose of the respective audit.

In the event of non-compliance, our business partners are obligated to immediately and independently initiate necessary remedial measures.

### Reporting and handling of compliance violations

Violations of laws, policies and other regulations must be recognized in a timely manner to prevent damage to Awin and our business partners and to ensure a fair and trusted partnership. If our business partners become aware of a violation of this Supplier Code of Conduct, they must report it to Awin immediately. We require cooperation with respect to any subsequent clarification measures.

Awin expects its business partners to enable their employees to raise concerns without fear of disadvantage or retaliation.

At Awin, employees and external parties have the opportunity to submit an anonymous report via our electronic whistleblowing system. The [electronic whistleblowing system](#) is managed by employees from the Awin Corporate Compliance Team. In the event of an allegation of a violation of the Awin Supplier Code of Conduct and/or applicable laws by a business partner, such business partner must cooperate with all requests for information. In the event of a confirmed violation, Awin reserves the right to all necessary remedial action including, but not limited to, termination of contract and the overall business relationship in compliance with the contractual or legal provisions.

## Contact

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