



Supplier Code of Conduct

Code of Conduct for Suppliers and Service Providers

Table of contents

I.	Introduction	2
II.	Compliance with the law.....	3
III.	Labor	3
1.	Forced labor	3
2.	Child labor	3
3.	Occupational safety & health	3
4.	Working hours and compensation.....	3
5.	Freedom of association.....	4
IV.	Environment	4
V.	Equal treatment/discrimination	4
VII.	Corruption.....	5
VIII.	Money laundering	5
IX.	Conflicts of interest	5
X.	Data protection and information security	5
XI.	Reporting violations	6

I. Introduction

Mister Spex SE (hereinafter referred to as "Mister Spex" or "we") acts according to central corporate values, which are specified in this Code of Conduct. It includes legal and ethical standards of conduct that Mister Spex expects each of its suppliers and service providers to comply with. Thus, the company as a whole strives to act responsibly.

This Code of Conduct is intended to serve as a guideline for our suppliers and service providers. It formulates a minimum standard of ethical and lawful conduct. Our suppliers are expected to comply with these standards by establishing policies and procedures to ensure ongoing compliance. The guidelines are orientated to the ESG standards, the requirements of the relevant ILO conventions and the OECD Guidelines for Multinational Enterprises.

II. Compliance with the law

Our suppliers/service providers comply with the laws of the applicable jurisdictions.

III. Labor

1. Forced labor

Our suppliers/service providers ensure that no form of forced labor, bonded labor, involuntary labor or modern forms of slavery occurs within the entire supply chain. The same applies to punishment through physical or psychological coercion and any form of human trafficking. Work must always be performed voluntarily. Workers retain control of their identification documents at all times.

2. Child labor

Our suppliers/service providers ensure that no form of child labor occurs within the entire supply chain. Therefore, they as well as their suppliers observe the prohibition of child labor.

3. Occupational safety & health

Our suppliers/service providers ensure that a high standard of occupational health and safety protection is in place for all employees. A healthy and safe working environment shall be created in which workers and third parties are protected from injury, illness and other damage.

The safety of the working environment shall be continuously monitored, appropriate hazard prevention measures shall be applied and, if necessary, protective equipment shall be provided to employees.

4. Working hours and compensation

Our suppliers/service providers ensure that the working hours and wages of their employees also comply with nationally applicable laws and binding industry standards, as well as ILO standards. Every employee has a right to fair remuneration for her/his work, with which he can provide a decent existence for herself/himself and her/his family.

In particular, fair competitive wages shall be paid that do not fall below the minimum wage provided for in the applicable legal system.

In addition, working hours are to be arranged in such a way that the maximum working hours prescribed in each case are not exceeded. Also, care shall be taken to ensure that prescribed rest periods are observed and that recreational leave is made possible.

5. Freedom of association

Our suppliers/service providers recognize and uphold the right to bargain collectively in accordance with locally applicable laws. Supplier/service provider employees must have the free choice to join or not join a union/employee representation of their choice without threat or intimidation.

IV. Environment

Our suppliers/service providers use natural resources sparingly and responsibly.

They ensure safety and compliance with relevant regulations in the handling, storage, transportation, disposal, recycling and reuse of waste, exhaust gases and wastewater. All environmentally harmful impacts emanating from the supplier/service provider or third parties within the supply chain are reduced to a minimum or, as far as possible, avoided altogether.

Our suppliers/service providers also comply with all applicable legal requirements relating to environmental protection.

V. Equal treatment/discrimination

Our suppliers/service providers ensure that no form of discrimination or unjustified unequal treatment occurs within their company.

We are committed to a diverse and inclusive corporate culture which, by taking into account as many views, values and ideas as possible, enables us to make business decisions that meet the ethical standards of our company. This principle is a fundamental part of our corporate identity. Therefore, we also expect our suppliers/service providers to embrace diversity and promote it on an ongoing basis.

Any discrimination of persons, in particular on the basis of ethnic origin, religion, ideology, age, disability, gender or sexual identity, is contrary to these values and will not be tolerated by our suppliers/service providers. The same applies to sexual harassment or other personal disparagement.

VI. Free and fair competition

Our suppliers/service providers comply with the applicable competition and antitrust laws.

VII. Corruption

Our suppliers/service providers will be mindful to comply with relevant national and international anti-corruption laws. In particular, any involvement in offenses such as extortion, fraud, bribery or corruption shall be avoided.

Any attempt to illegally influence employees, other business partners or market participants in competitive matters will be investigated by our suppliers/service providers. Subsequently, legal action may also be taken if necessary.

To prevent the aforementioned offenses, we have developed a separate guideline which sets out the behavioral requirements for suppliers and service providers with regard to this issue (Anti-Corruption Guideline).

VIII. Money laundering

Our suppliers/service providers comply with applicable anti-money laundering and counter-terrorist financing laws.

To prevent involvement in money laundering and terrorist financing transactions, our suppliers analyze and document transactions in connection with our business comprehensively and critically. Suspicious transactions, especially those involving cash, are reported immediately to the appropriate authorities. They are required to accept only money that comes from reputable and legal sources.

IX. Conflicts of interest

Our suppliers/service providers take care to avoid conflicts of interest arising from their cooperation with Mister Spex. A conflict of interest can always arise when conflicting loyalties lead to obtaining a personal advantage or benefit.

Therefore, our suppliers/service providers particularly avoid any financial or other relationships with employees of Mister Spex that could lead to a conflict of interest for Mister Spex or its employees. Even conflicts of interest that may only possibly exist must be reported immediately to Mister Spex due to their potentially damaging effect on the company's reputation.

X. Data protection and information security

Our suppliers/service providers comply with all applicable laws and regulations on data protection, including the protection of personal data, in particular the General Data Protection Regulation (GDPR). This applies in particular with regard to personal data of customers, consumers, employees and shareholders. They observe all existing legal requirements when collecting, recording, storing (including hosting), processing, transferring, using or deleting personal data.

In addition, our suppliers/service providers implement the data protection provisions of Mister Spex. For their part, they also ensure that their business partners also commit to compliance with these data protection standards.

XI. Reporting violations

Our suppliers/service providers and third parties are required to report any possible or actual compliance violations without delay. For this purpose, the whistleblower system provided in the Compliance Management Guideline is to be used. According to the procedure explained there, it is also possible to submit a report completely anonymously.

The Mister Spex whistleblower system is available at: <https://fachanwaelte-strafrecht-potsdamer-platz.de/en/compliance/ombudsman-lawyer-of-confidence/ombudsman-whistleblowing-companies-organisations/mister-spex>

In addition, our suppliers/service providers are required to set up their own whistleblower mechanisms. Violations of the law and/or this Code of Conduct must be able to be reported anonymously, whereby confidentiality must be maintained and negative consequences for the whistleblower must be ruled out.

Place, Date

Supplier