

# Code of Conduct for Partners and Suppliers of Intershop Communications AG

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Our commitment to integrity and quality

Dear Partners and Suppliers:

We at Intershop Communications AG<sup>1</sup> attach great importance to constructive, trusting, and respectful partnership with you, our partners and suppliers. Our Code of Conduct for Partners and Suppliers describes the basic principles that underlie our business relationship. We expect you, our partners and suppliers, to comply with our Code of Conduct and, in turn, to pass on our standards to your own partners and suppliers. We also expect you to require them to comply with these standards and to ensure that they do so.

We value our relationship with you and thank you for sharing our commitment to society, the environment, and ethical business practices and for helping us to deliver on that commitment.

Jena, February 15, 2023



Markus Klahn  
Chief Executive Officer



Petra Stappenbeck  
Chief Financial Officer

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<sup>1</sup> Hereinafter "Intershop"

# 1 Conduct in business transactions

## COMPLIANCE WITH LAWS AND POLICIES

We expect our partners and suppliers to comply with national and other relevant laws and regulations that apply in the countries where they do business and with the rules laid down in this Code of Conduct.

## AVOIDING CONFLICTS OF INTEREST

To safeguard Intershop's reputation, we must ensure that our relationships with third parties are above board and that we are able to make objective and loyal business decisions on behalf of Intershop. We therefore expect our partners and suppliers to make business decisions concerning Intershop on a solely factual basis. Our partners and suppliers avoid any actual or perceived conflicts of interest.

## ANTI-CORRUPTION

Intershop does not accept or tolerate any form of corruption or unlawful influence. We expect our partners and suppliers to firmly reject any form of corruption, conduct detrimental to the company, and unfair business practices and to comply with applicable laws. We also expect them to take appropriate preventative measures, such as implementing internal company policies, conducting training, and imposing penalties in the event of violations. Particular attention should be paid to gifts and hospitality. In connection with their activities for Intershop, our partners and suppliers should only extend or accept invitations if they are reasonable, are not made in expectation of receiving an unlawful benefit or other preferential treatment, and are not in breach of applicable laws (in particular anti-corruption legislation). The same applies to accepting or giving gifts, other benefits, or advantages of any kind.

## PREVENTING MONEY LAUNDERING

We expect our partners and suppliers to comply with anti-money laundering legislation and not to engage in money laundering activities of any kind.

## EXPORT AND IMPORT REGULATIONS

We expect our partners and suppliers to follow any trade restrictions that are in place and to comply with import and export control regulations and economic embargoes.

## FAIR COMPETITION

We expect our partners and suppliers to comply with all relevant competition regulations. Our partners and suppliers do not enter into any arrangements or agreements that influence prices, terms and conditions, strategies, or customer relationships, and especially the participation in tenders. The same applies to the sharing of sensitive competition-related information and to any other conduct that unlawfully restricts competition or is likely to do so.

## QUALITY AND SAFETY OF OUR PRODUCTS

The quality of our products and their safety for our customers, partners, and suppliers are key elements of our identity and how we are perceived. We expect our partners and suppliers to comply with all relevant quality control requirements and to honor the contractual terms and specifications set out by Intershop and its customers. They must ensure that effective methods and processes are established and maintained to prevent copying or unauthorized sharing of our products or unauthorized access to services.

## RESPONSIBLE SUPPLY CHAIN

We are aware of our responsibility as a global company. A constructive, trusting, and respectful partnership with our partners and suppliers is central to this responsibility. Accordingly, we expect our partners and suppliers to comply with this Code of Conduct and, in turn, to pass on our standards to their own suppliers. We also expect our partners and suppliers to require their suppliers to comply with these standards and to ensure that they do so.

## INFORMATION SECURITY, CONFIDENTIALITY, AND DATA PROTECTION

We expect our partners and suppliers to safeguard Intershop's operating and trade secrets that become known to them in the course of the partnership, to use them only for the purposes of the partnership, and to maintain secrecy with regard to Intershop's confidential information and trade secrets, including confidential information of our customers, suppliers, and partners. We also expect our partners and suppliers to comply with all applicable laws on the protection of personal data, in particular that relating to employees, partners, suppliers, and customers.

## PROTECTION OF THIRD-PARTY ASSETS

We expect our partners and suppliers to respect the intellectual property of third parties and other proprietary rights (for example, copyright).

## INSIDER TRADING

We expect our partners and suppliers to adhere strictly to the statutory provisions on insider trading and the handling of inside information.

## REPORTING

We expect our partners and suppliers to conduct their business properly in accordance with legal requirements, including recordkeeping and financial reporting.

## 2 Conduct toward each other

### DIVERSITY AND EQUAL OPPORTUNITIES

Our partners' and suppliers' interaction with their employees, customers, partners, suppliers, and third parties must be characterized by respect and appreciation. No one may be discriminated against or disadvantaged on the basis of nationality, ethnic origin, skin color, sexual identity, religion, ideology, or disability or on the basis of gender or age. We expect our partners and suppliers to foster a culture of equal opportunity and to respect the structures, customs, and traditions of other cultures.

### RESPONSIBILITY TOWARD PEOPLE

We expect our partners and suppliers to comply with internationally recognized human rights, to reject all forms of child labor and forced labor, and to comply with the applicable regulations prohibiting child labor.

### RESPECT FOR EMPLOYEE RIGHTS

General ethical values and principles must be respected by our partners and suppliers. The basic employee rights laid down in applicable national laws must be observed, together with recognition of the United Nations' Universal Declaration of Human Rights, taking into account the laws and regulations applicable in the various countries. We expect that the remuneration and other benefits provided by our partners and suppliers to their employees comply, as a minimum, with the applicable national and local statutory standards or with the level prevailing in the national economic sectors/industries and regions.

### HEALTH AND SAFETY IN THE WORKPLACE

We expect our partners and suppliers to ensure the occupational health and safety of their employees in the workplace in compliance with applicable laws and regulations and to establish an appropriate occupational safety management system. This includes ensuring that regulations on building security and fire safety are observed and that employees are provided with appropriate protective equipment where necessary.

## 3 Conduct as a member of society

### ENVIRONMENTAL PROTECTION, CLIMATE CHANGE MITIGATION, AND NATURE CONSERVATION

Environmentally responsible conduct and sustainable use of natural resources are an ethical and corporate duty for our partners and suppliers. Our partners and suppliers are required to comply with all applicable laws and regulations on protection of the environment in the course of their business activities and to establish and maintain an appropriate environmental management system. They are obliged to comply with nature conservation obligations. We expect them to contribute to protection of the environment, climate, and nature through their actions and to continuously improve their efficiency through responsible and careful use of resources and by minimizing environmental pollution and hazards.

### DONATIONS AND SPONSORING

We expect our partners and suppliers to attach great importance to transparency when making donations and engaging in sponsorship. They must not use sponsorship to obtain unlawful business advantages. All donations must be made voluntarily, with nothing expected in return. Our partners and suppliers do not tolerate unlawful corporate donations made for political purposes or to party-affiliated or party-like organizations, elected representatives, or candidates for political office.

## Compliance with the Code of Conduct for Partners and Suppliers and reporting any breaches

The Code of Conduct for Partners and Suppliers should become an integral part of all contracts and agreements between Intershop and our partners and suppliers.

Partners and suppliers can report suspected breaches of the Code of Conduct to Intershop's management board. All information will be treated confidentially and with appropriate care.