

# Coromatic Code of Conduct





## **Our vision**

Coromatic is the Nordic leader in Critical Facilities Solutions, helping customers secure their Mission Critical Operations 24/7. Critical Facilities include Data Centers, Connected Workplaces and other Technical Infrastructure where Data Communications or Power need to be secured.

## **Our mission**

We are here to help our Customers Secure their Mission Critical Operations 24/7 and to build a company that Attracts customers, Develops and Excites the Best People in the Industry.

Coromatic assumes responsibility towards our customers, employees and business partners. But also towards the communities and society in which we operate.

### Our culture and values

We are a reliable and an enduring partner to our customers with the highest professional integrity.

We bring value to our customers by securing and improving our customers' Critical Facilities in the most cost efficient and sustainable way.

We create an inclusive yet performance driven One Coromatic environment Managers should be performance driven – in every aspect of working life. Their behavior sets the standards at work. To support this each manager provides and receives feedback in a constructive way and always behaves in an ethical way, founded on respect for other people.







## Content

Intro	Introduction		
<b>1</b> 1.1 1.2 1.3	Taking care of people and the environmentHuman rights0Health, safety and security0Environmental protection0	38	
<b>2</b> 2.1 2.2 2.3 2.4 2.5 2.6	<b>Creating sustainable relationships</b> Fair competition and the avoidance of tax evasion	12 13 14 15	
<b>3</b> 3.1 3.2 3.3 3.4	Protecting information and assets Corporate assets	19 20	
	ing advice		
	x E OF CONDUCT TO GO	25	







Our Code of Conduct defines our responsibilities



#### Introduction

Coromatic's purpose is to improve people's lives and create a better tomorrow. Our ability to deliver on this is dependent on our people, our ethical standards and our ability to build long-lasting relationships.

Our Code of Conduct defines our responsibilities and how we expect our people to behave to ensure a constructive and productive working environment that supports our core values and beliefs. It guides and supports our people to take the right decisions and do the right thing.

A violation of the Code of Conduct may cause damage to Coromatic, our employees and our partners, and could result in legal action against Coromatic and its employees. The Code of Conduct and People Guidelines therefore applies to all Coromatic's employees, including the members of Coromatic's Board of Management and all executives.







1 Taking care of people and the environment

## Human rights

We are committed to the freedom and equality of people irrespective of race, color, sex, language, religion, political or other opinion, national or social origin, birth or other status. To show our commitment, we support the Universal Declaration of Human Rights of the United Nations and the European Convention for the Protection of Human Rights. We preserve Human Rights as well as the Principle of Equal Treatment

We support Diversity and protect the Personal Rights of Every Individual

Diversity is a key part of our daily business and culture. We expect all our employees to always respect the dignity, privacy and personal rights of each individual. We do not tolerate discrimination, harassment or abusive language under any circumstance.







## Health, safety and security

Ensuring a secure, healthy and safe environment for our employees is one of our key priorities. We mitigate risks and promote health, security and wellbeing through the constant improvement of our processes, and health promotions and preventive measures. We Ensure a Secure, Healthy and Safe Environment

We do not compromise on safety practices, behaviors or conditions. No job is worth putting someone's health or life in danger. Thus, we expect all employees to comply with our health, safety and security regulations, promote a safe and healthy work environment and improve our health and safety culture. It is essential that we work together to achieve a common understanding on how to act and work together safely.







## **Environmental protection**

Environmental protection is one of the most important concerns in our society. It presents a great challenge in politics, businesses and our daily lives.

At Coromatic, it is our objective to keep our environmental impact responsibly low by understanding our impact, as well as our customers' impact, and by continuously improving our sustainability performance.

Our efforts and solutions enable both us and our customers to reduce emissions, increase energy efficiency and contribute to a sustainable, cleaner future.

#### We Work Sustainably and Conserve Resources







# Creating sustainable relationships

2

## Fair competition and the avoidance of tax evasion

At Coromatic we are convinced that we can only win and keep customers and have sustainable relationships if we act responsibly and fairly. We Stand for Fair Competition and Do Not Tolerate Tax Evasion

Therefore, we are committed to open markets and fair competition. It is important for us to always comply with the rules of national and international laws. We also expect this of our business partners and all other market participants.

We expect our employees, our executives and parties we engage with to comply with their tax obligations. We do not tolerate anyone who knowingly assists or encourages tax evasion.







## Avoidance of conflict of interests

A conflict of interests is a situation in which there is a risk that personal interests of an employee or third party may impact Coromatic or our customers' interests. It is very important that our employees do not enter into conflicts of interests or loyalty.

We rely on all our employees to make their decisions solely on the basis of objective criteria, and not to be influenced by personal interests and relationships in business decisions.

Employees are obliged to notify their superiors immediately of a possible conflict between their work and private interests. Conflicts of interests may particularly arise if an employee acts as a competitor of Coromatic, is active for or involved in another company which concludes legal transactions with Coromatic. We Balance Personal Interests and the Interests of the Company Carefully







## **Anti-Corruption**

Corruption generates decisions for unlawful reasons, prevents progress and innovation, distorts competition and harms companies. Corruption is therefore prohibited under penalty and can hence lead to fines for the company and criminal prosecution for the employee, executives and Board Members concerned.

We are committed to fighting corruption in any form all over the world and as a part of E.ON Group we are also a member of the Global Compact. We therefore support national and international efforts to combat corruption and reject any corrupt behavior. This applies, in particular, to granting so-called acceleration payments ("Facilitation Payments" - payments of small amounts directly to the responsible officials). These are unlawful and punishable in most countries and can lead to very significant penalties depending on the region.

The Anti-Corruption People Guideline must be adhered to when accepting and granting gratuities in dealing with business partners as well as public officials and mandate holders. Particularly arise if an employee acts as a competitor of Coromatic, is active for or involved in another company which concludes legal transactions with Coromatic. We Do Not Give or Take Bribes







## Donations and sponsorship

We ensure transparency in our donation and sponsorship activities.

We Make our Donations and Sponsorship Activities Transparent and Take Responsibility for the Common Good

We use our sponsorship to promote certain objectives, such as social responsibility, cultural activities, educational purposes, science, and sports events. We donate voluntarily, demand nothing in return, and comply with applicable laws and local regulations. We categorically exclude donations to political parties, political candidates, managers of political offices, or representatives of the public administration.







## Avoidance of money laundering and sanction breaches

Money laundering means the introduction of illegally generated money or illegally acquired assets into legal financial and economic circulation.

We combat all forms of money laundering, take precautions to avoid being involved in money laundering issues, and comply with applicable national and international sanctions, embargo regulations, and other restrictions of foreign trade legislation. This also applies to our business partners who act on our behalf. We Combat all Forms of Money Laundering and Comply with Sanctions







## Dealing with suppliers of goods and services

We maintain a wide range of business relationships with suppliers. These relationships enable us to offer our own products and services at a competitive price. Our economic success depends, among other things, on a careful selection of strong and reliable partners. We therefore carefully select suppliers and service providers according to internal specifications and thereby avoid any improper preference.

Any employee involved in the selection of suppliers, service providers or other contracting parties who has a personal link and could influence the selection process must notify his superiors because this could be a conflict of interest. No employee may have a provider with whom he is professionally involved, execute any private orders for him, unless authorized by his superiors. We Stand for Good Collaboration







## 3 Protecting information and assets

## **Corporate assets**

Coromatic's corporate assets are used to achieve our business objectives and it is in our interest to protect our property and assets.

Assets can be financial, physical or intangible. Coromatics's assets should only be used for suitable and authorized purposes; the unsuitable or unauthorized use of Coromatic's assets is prohibited. In this regard, payments to employees or anyone working for Coromatic granted excessively or for inappropriate reasons are prohibited.



Coromatic secures availability of power and data communications for mission-critical functions. We are here 24/7 for our customers to secure high availability and productivity in facilities, to save lives by securing operations without disruptions and to protect the environment by optimizing energy consumption.



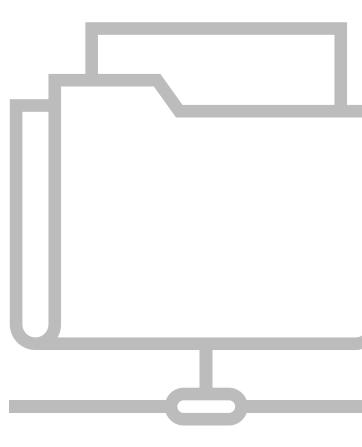
We Take Care of our Company's Property and Assets

## **Privacy protection**

Special legal regulations exist for the protection of personal data. Data is considered to be personal if it includes personal or factual information about an individual.

Examples include address, bank details, smart meter data, usage profiles or data in cookies of customers, employees, or suppliers. There are also particularly sensitive categories of data, such as religious denomination and health data.

We have a great interest in protecting personal data against unauthorized processing, unauthorized modification, distribution or deletion. We oblige our employees to protect the personal data entrusted to Coromatic and our subsidiaries against unlawful processing and misuse. We Protect the Privacy of Every Individual







## **Company and business secrets**

Coromatic has valuable know-how and extensive business and trade secrets. This knowledge is the foundation of our business success. It is our responsibility to ensure the confidentiality, availability and integrity of this information, whether in electronic form or on paper.

The unauthorized transmission of trade or business secrets, their unauthorized alteration, destruction or disclosure, may cause great damage to Coromatic . It can lead to labor, civil and criminal penalties for the employee concerned. We therefore take all necessary and appropriate measures to prevent misuse of company and business secrets.

We acknowledge the intellectual property of competitors and business partners. All employees are obliged to keep third party business and trade secrets and to only use them as agreed with the respective third party. We Do Not Disclose Confidential Information







## Insider information and trading

We are committed to fair and sustainable securities trading. It is important for our reputation that we treat insider information as confidential.

Insider information is any non-public information that is likely to have a significant effect on the stock or market price of the insider security, such as mergers and acquisitions, technical innovations or important changes to the management organization. Breaches of confidentiality relating to insider information or insider trading can lead to substantial fines for E.ON and criminal prosecution for the employee concerned. Violating insider trading laws can be avoided by strictly abiding to the following rules:

- Do not buy or sell securities on which you possess insider information.

- Do not make insider information available or discuss it with any other person unless this person is an authorized E.ON employee or a third party who is entitled and requires such information to perform his or her duties.

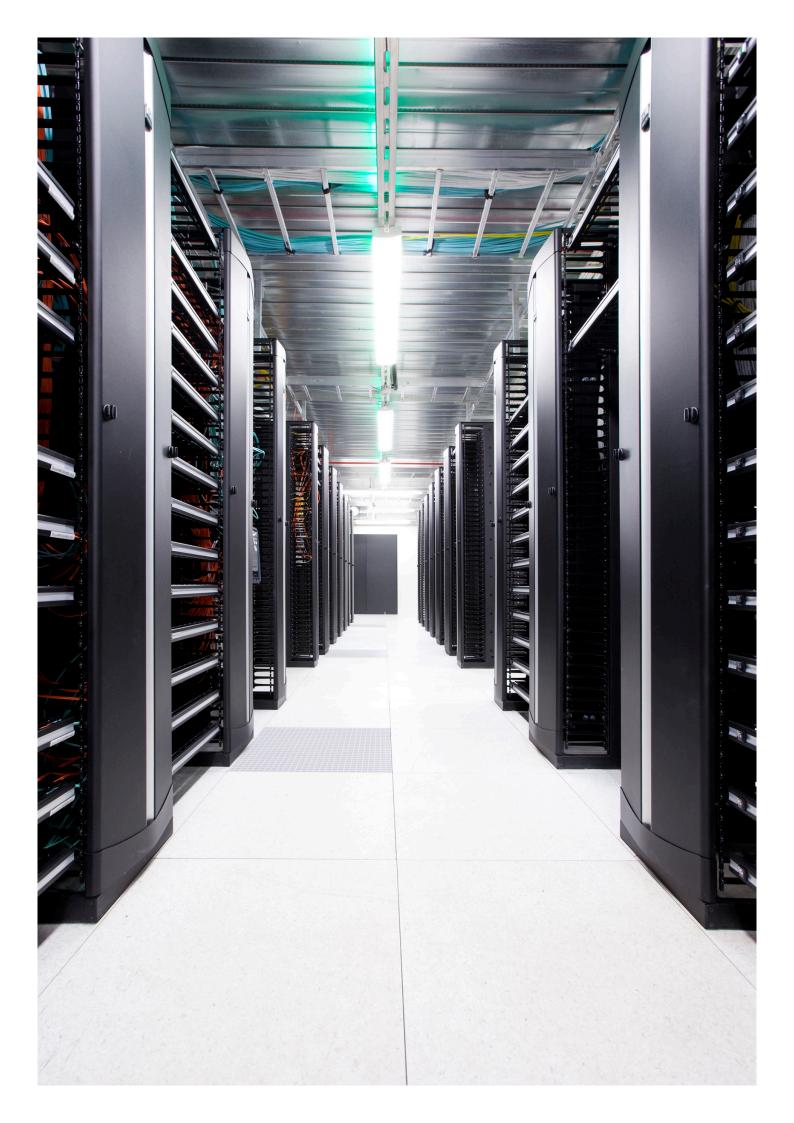
Contact the Head of Legal/BU Compliance Officer
Coromatic Group in case of doubt on whether
information should be classified as insider information.

We Keep Insider Knowledge to Ourselves









## Seeking advice

Compliance with law, rules and regulations is for us an essential basic principle of responsible business conduct. Coromatic adheres to legal prohibitions and requirements at all times, even if this involves short-term business disadvantages or difficulties for Coromatic or individuals.

This Code of Conduct will help understand our culture and our way of working. However, employees may be confronted with complex situations where they feel that these documents do not provide a clear answer. When this is the case, we expect the employee to discuss the matter with their line manager or with the respective Compliance Officer.

You can report via email or phone (anonymously) any possible violations of the law or of company policy, particularly in areas such as antitrust law, capital market law/insider rules, corruption, fraud (deception, embezzlement), tax evasion and non-compliance with the Code of Conduct by Coromatic employees (referred to as the "whistleblower"). If you have any Questions, please Contact your Line Manager or your Respective Compliance Officer







## FAQ

#### How can rule infringements be reported?

Where the Code of Conduct is infringed, employees may inform their supervisor or the relevant Compliance Officer. Employees may also report infringements of the Code of Conduct to the Compliance Officer of Coromatic . Reports of violations of the Code of Conduct may also be made anonymously using a whistle-blower report. In the event of concrete indications, investigations to clarify the facts are initiated straight away and suitable counter-measures taken.

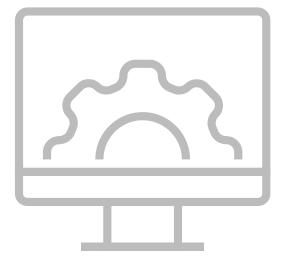
#### Are reports treated in confidence?

The reports are examined by the Compliance Officer in collaboration with the relevant departments at E.ON. Reports are treated in confidence. Where the complainant's identity is known, it is kept secret. Upon request, the complainant is provided with information about the treatment of his or her complaint.

## What happens if a rule is infringed by accident?

We want to learn from our mistakes and view them as opportunities. But in order to learn from them, we first have to acknowledge them. It is desired and expected that mistakes and misconduct be pointed out. By making mistakes and misconduct transparent, we can all prevent harm to our employees and company.

Employees who address or report mistakes and misconduct will not be subject to retaliation. Employees who have been accused of misconduct are also treated fairly.







## Code of Conduct TO GO

Our Code of Conduct defines our responsibilities and how we expect our people to behave to ensure a constructive and productive working environment that supports our core values and beliefs. It guides and supports our people to take the right decisions and do the right thing.

And if you don't have the Code of Conduct ready, here are 3 important questions, which you should ask yourself, whenever you are unsure:

What would others think of this decision?

Am I willing to accept the responsibility for this decision?

Is this decision consistent with the Coromatic Code of Conduct?

**Remember:** Act when you see a problem. Ask if you are not sure.

As an employee, you can also get additional support in your thoughts to comply with the code of conduct. Talk to the compliance officer and you will also find our supplementary guidelines on Coromatic's intranet, How we work/Polices & Guidlines/Group.

## Find more information on coromatic.com



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