

# Business Partner **Code of Conduct**



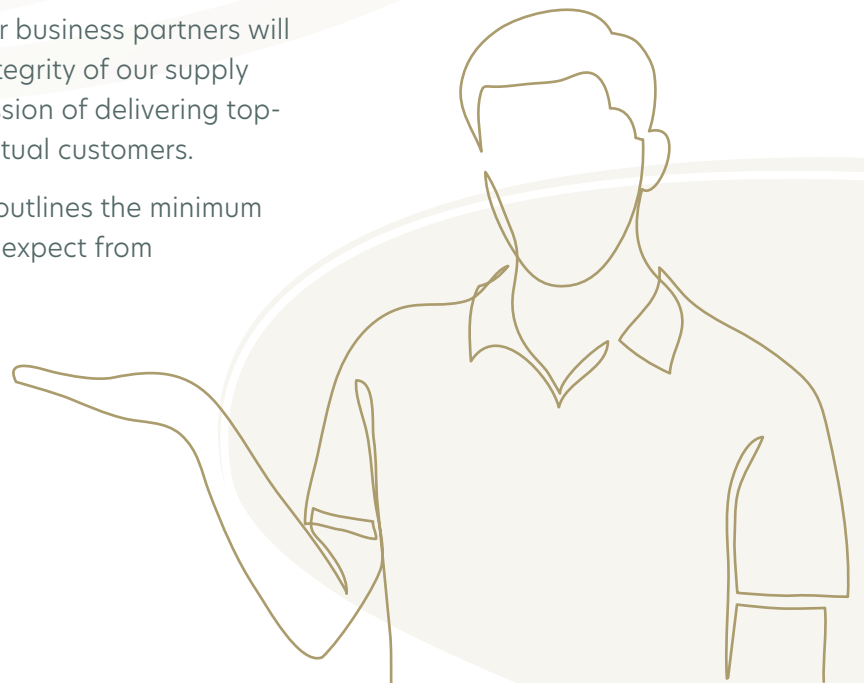
# Introduction

At Medius, our commitment to conducting business ethically, responsibly, and in full compliance with all applicable laws and regulations is unwavering. This dedication not only applies to our own operations, but also to our valued business partners, with whom we strive to cultivate sustainable and mutually beneficial relationships.

Recognizing the significance of our business partners in our value chain, Medius is devoted to collaborating with and supporting them in achieving shared objectives. We believe that a partner's performance and adherence to high business standards are essential components of our collective success.

To uphold our commitment to integrity and professionalism, we have established the Business Partner Code of Conduct. This code is designed to ensure that our business partners champion safety, respect for human rights, and environmental responsibility. It serves as a guiding framework for our partners to align their operations with our core values and ethical standards. By adhering to this code, our business partners will play a crucial role in maintaining the integrity of our supply chain, ultimately contributing to our mission of delivering top-quality products and services to our mutual customers.

The Business Partner Code of Conduct outlines the minimum standards of business conduct that we expect from all of our Business Partners.



## **Who does this Business Partner Code of Conduct apply to?**

The Business Partner Code of Conduct applies to all our business partners that provide products or services to Medius, or that are engaged or instructed to act for or on behalf of Medius, such as e.g. suppliers (and subcontractors if used while engaging with Medius), consultants, distributors, resellers, ISVs, agents and other representatives.

## **Compliance with Laws.**

Medius requires all our business partners to operate in accordance with the principles in this Business Partner Code of Conduct and in full compliance with all applicable laws and regulations. The Business Partner Code of Conduct does not replace legislation and if the two are in conflict, legislation takes precedence. If the Business Partner Code of Conduct sets a higher standard than the existing legislation, the reverse applies. The Business Partner Code of Conduct is valid in the English language. Where there are different language versions of this document, these shall be considered translations only. The form in Appendix 1 can be used in order to sign the Business Partner Code of Conduct.

## **Raising concerns.**

Should you or your employees believe that the terms of the Business Partner Code of Conduct are not adhered to or that Medius is not acting in accordance with its own Code of Conduct then we encourage you to raise your concerns in compliance with our whistleblowing function ([Microsoft Word - Medius Whistleblower policy Final, 15 Dec 2023](#)) or through any of your contacts within Medius.

## **Implementation and monitoring.**

Medius monitors the implementation and adherence of the Business Partner Code of Conduct. Medius will assess its business partners' compliance with the Business Partner Code of Conduct. Any violations of the Business Partner Code of Conduct may jeopardize the business partner's business relationship with Medius, up to and including termination.

## 1. **Business ethics.**

- 1.1 **General.** Medius is committed to upholding the highest standards of business ethics and expects our business partners to do the same. We require our partners to adhere to all applicable laws and regulations in their countries of operation, and to abstain from any corrupt activities. These activities include, but are not limited to, extortion, bribery, conflicts of interest, fraud, facilitation payments, embezzlement, self-enrichment, and unlawful kickbacks. Our business partners must not engage in any form of corrupt practices.
- 1.2 **Conflict of Interests, confidentiality and intellectual property rights.** Conflicts of Interests between a business partner and Medius must be avoided. Potential conflicts may arise from outside business activities, personal financial interests, the employment of or transactions with family members and close personal friends. Moreover, Medius expects its business partners to safeguard all confidential information provided by Medius and respect the intellectual property rights of Medius and other parties.
- 1.3 **Data Protection.** Business partners are expected to comply with all relevant data protection laws and regulations, safeguarding the privacy and security of personal information.
- 1.4 **Export Controls.** Business partners must adhere to all applicable trade control laws, as well as any relevant laws and regulations governing the import, export, re-export, or transfer of goods and services, including software and technology.
- 1.5 **Competition and Antitrust Laws.** Business partners are required to comply with all applicable competition and antitrust laws and regulations. They must not engage in practices such as price fixing, market sharing, bid rigging, or customer allocation, which undermine fair competition.

## 2. **Human Rights & Labor Standards.**

- 2.1 **Forced or bonded labor and human trafficking.** Medius strictly prohibits the use of forced or bonded labor, prisoners, or illegal workers, and expects the same from its business partners.
- 2.2 **Child labor.** Medius does not tolerate child labor and expects its business partners to share this stance.
- 2.3 **Freedom of Association and Collective Bargaining.** Medius expects its business partners to respect their employees' rights to freely join or refrain from joining associations of their choice, establish such associations, and engage in collective or individual bargaining in accordance with local laws and regulations. No employee should face harassment or retaliation for exercising these rights.

- 2.4 **Working hours.** Business partners must comply with all applicable national legislation and mandatory industry standards regarding working hours, overtime, wages, and benefits. Unfair wage deductions as disciplinary measures are not permitted.
- 2.5 **Health and safety and working conditions.** Medius expects its business partners to strive for high levels of occupational health and safety by adopting appropriate health and safety management practices. Business partners should comply with occupational health and safety regulations and ensure a work environment free from health and safety risks to protect third parties and prevent work-related accidents, injuries, or illnesses. This includes conducting regular workplace risk assessments and implementing appropriate risk controls and precautionary measures. Employees must receive proper health and safety training.
- 2.6 **Regular employment.** All employees should be provided with a written employment contract outlining their terms and conditions in accordance with the local relevant legal jurisdiction. We expect all employment and termination of employment to be carried out fairly and equitably.
- 2.7 **Work environment.** Medius is committed to provide a safe work environment and expects its business partners to do the same.
- 2.8 **Diversity and Inclusiveness.** Business Partners are expected to foster a welcoming work environment that appreciates the diversity of its employees. They should actively work to eliminate any form of discrimination based on gender, race, religion, age, disability, sexual orientation, national origin, or any other characteristic protected by law.

### 3. Environment

- 3.1 **Environment and sustainability.** Business partners are expected to comply with all legal environmental requirements, obtain and maintain all necessary environmental permits and licenses for their operations.
- 3.2 **Environmental performance.** Business partners should regularly assess, monitor, and evaluate their environmental performance, striving for continuous improvement in reducing their environmental impact. This includes implementing practical measures and adopting advanced practices wherever possible.
- 3.3 **Resource Management and Emission Reduction.** Business Partners are encouraged to actively reduce their consumption of energy, water, and raw materials, prioritizing renewable or sustainably sourced options. They should diligently monitor and minimize emissions that contribute to pollution or climate change.
- 3.4 **Supply Chain Environmental Standards.** Business Partners should consider the environmental credentials and performance of vendors within their own supply chain, requiring them to adhere to a minimum set of standards to promote sustainable practices throughout the supply chain.

Medius requests that the authorized signatory of your company carefully review this Medius Business Partner Code of Conduct document. By signing below, you confirm your understanding of, and agreement to comply with, the Medius Code of Conduct.

I, the undersigned authorized signatory of the company specified below, hereby confirm that the company understands and will comply with the Medius Business Partner Code of Conduct.

Place, date:

Company Name:

Signature:

Name:

Title:

