

Code of Conduct for Business Partner Policy

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The aim of this policy

commercetools strives to ensure an ethical supply chain and focuses on the need for corporate social responsibility, working in a way that treats workers and the environment ethically.

We require our business partners to incorporate social and human rights and environmental considerations into how they do business across the world. The aim of this policy is to communicate this content and our philosophy to commercetools' business partners in a simple and understandable way.

Scope

This Statement applies to all entities within the commercetools Group globally, including employees, contractors, and supply chain partners. It covers all business divisions and operations of commercetools worldwide.

Imprint

Publisher: commercetools GmbH
Contact: compliance@commercetools.com
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Introduction

This Code of Conduct for business partners (the "Code") provides the foundation for our continuous engagement with business partners and dialogue in good faith on their ethical, social and environmental performance. It outlines our expectations regarding basic compliance with applicable law, respect for labour and human rights, environmental management and anti-corruption. This code is an integral part of our relationships and part of all contracts with business partners. In commercetools, we fully commit ourselves to the principles of this Code, which is an excerpt of our Global Code of Conduct.

General expectations

We expect our business partners to maintain awareness and comply with all applicable national laws, rules and regulations. If these are in contradiction with the specific expectations of this Code, the highest standards should be applied. In addition, we expect business partners to embed international principles (e.g. UN Guiding Principles on Business and Human Rights) and conventions (e.g. ILO conventions) into their own operations by introducing policies, procedures, and safe and confidential grievance mechanisms appropriate to their sector and size.

Employees and interested stakeholders shall have access to the grievance mechanisms. Business partners are responsible for ensuring compliance with this Code. In addition, business partners are expected to apply appropriate due diligence measures to ensure that high-risk sub-suppliers to commercetools comply with this Code or a similar framework. We are aware that improving ethical, social and environmental performance requires time and resources.

However, if a business partner, by intention or repeated negligence, fails to live up to this Code in an explicit and severe manner, or if the business partner continually refuses to engage in due diligence activities or lacks commitment to make progress on issues identified during an assessment, commercetools reserves the right to reconsider continuing with the business relationship.

Human Rights including labour rights

We expect our business partners to avoid and address adverse impacts on human and labour rights as listed in the International Bill of Human Rights and the International Labour Organisation's declaration on Fundamental Principles and Rights at Work. The following highlights specific examples of minimum expectations of business partner performance (in alphabetical order).

Child labour

We expect our business partners to prohibit the use of child labour and to ensure that no person is employed at an age younger than 15 (or 14 where the law of the country permits) or younger than the age for completing compulsory education in the country of the service, if such age is higher than 15. Business partners shall protect young workers of legal working age, up to the age of 18, from any type of employment or work which, by its nature or circumstances in which it is carried out, is likely to jeopardise their health, safety or morals, or interfere with their schooling needs. If a child is found working, the business partner must act in the best interest of the child, and any measures taken should aim at improving the child's well-being.

Community relations

commercetools business partners shall engage and consult with potentially affected local communities, including local minorities, and avoid causing or contributing to negative impacts on their human rights. This may include impacts on culture, the environment, natural resources, land, infrastructure or other factors that are important to the fulfilment of human rights for local communities, including their health and livelihoods.

Conflict-affected areas

If our business partners operate in or source from conflict-affected areas, we expect them to conduct due diligence aimed at ensuring they are not linked to providing funding or support to armed actors. In addition, we expect our business partners to ensure that their products do not contain conflict minerals sourced from mines that support or fund conflict in conflict-affected areas.

Discrimination

We expect our business partners to treat employees fairly and provide a workplace which supports diversity and is free from discrimination in hiring, compensation, access to training, promotion, termination, retirement, working conditions, job assignments, benefits and discipline based on personal characteristics. This includes ethnic background, race, religion, age, sex, gender, disability, sexual orientation, outlook or social status.

Freedom of association and right to collective bargaining

Our business partners shall respect employees' and other workers' rights to join or refrain from joining any lawful workers' association or collective bargaining association of their choice, or, when restricted, alternative forms of independent and free workers representation. Business partners shall not discriminate against worker representatives and employees who choose to affiliate or not affiliate. We expect our business partners to engage in bargaining with employee representatives in good faith.

Harassment, abuse and disciplinary measures

Employees shall be treated with dignity and respect. We expect our business partners to prohibit the use of corporal punishment and physical, sexual, psychological, verbal or any other form of harassment, abuse or coercion. Business partners may perform disciplinary actions that have been duly communicated to all employees and any disciplinary action shall be recorded and acknowledged by the affected employee.

Health and safety

We expect our business partners to provide safe and healthy working conditions and take appropriate precautionary measures to protect employees from work related hazards and anticipated dangers in the workplace. Business partners shall abide by all applicable local laws and regulations to prevent accidents and injury to health arising out of, linked with, or occurring in the course of, work or as a result of the operation of employer facilities. We expect business partners to continuously improve working conditions and reduce workplace related risks and hazards by, for example, introducing a written safety programme, ensuring management responsibility for health and safety matters, setting targets, and conducting appropriate training.

Hiring practices and forced labour

We expect our business partners to provide all employees with written employment contracts outlining the conditions of employment in a language understood by the employee. We expect our business partners to conduct due diligence aimed at eliminating direct and/or indirect involvement in human trafficking and prohibiting all forms of forced, bonded or indentured labour, involuntary prison labour. This applies to all workers, whether hired directly, by a contractor or recruited through a labour broker. Employees shall enjoy the freedom of movement during their employment. Employees shall be permitted to terminate employment after reasonable notice and business partners shall not retain original identification documents, deposits or financial guarantees or withhold wages outside of a legal contractual agreement.

Remuneration

Our business partners shall abide by all wage and benefit laws and regulations, including those pertaining to minimum wages, overtime wages, sick leave, and other elements of compensation. Business partners shall also abide by lawful collective agreements on wages and benefits. At time of wage payment, business partners shall issue each employee a wage statement specifying at minimum all hours worked during that pay period and the rate of compensation.

Security arrangements

We expect our business partners to safeguard personnel and property in accordance with relevant human rights principles and in a manner that avoids or minimises risk of harm to workers and communities.

Working hours

We expect our business partners to prevent employees from working more than 60 hours per week including overtime, or the applicable limits on regular and overtime hours set by law, industry standards or collective agreements. Workers shall be entitled to rest breaks and rest days in accordance with the law, industry standards or collective agreements. Workers shall not be requested to work overtime on a regular basis.

Environment

We expect our business partners to carry out operations with care for the environment, comply with all relevant local and national environmental regulations and maintain all applicable licences, registrations or permits.

Environmental Impact

Business partners shall strive to minimise adverse impacts on the environment, human health and livelihoods of their products or services throughout their life cycle by:

- taking a precautionary approach to climate change related to their activities, products and services,
- having a precautionary approach to the use of resources and materials (incl. hazardous materials) and finding an environmentally friendly substitution whenever possible,
- disclosing usage of hazardous materials to facilitate safe management of their product during use, recycling and disposal,
- protecting biodiversity and promoting the sustainable and efficient use of land, natural resources and energy,
- establishing control mechanisms for the prevention of pollution from hazardous substances, waste and effluents and air emissions,
- providing access to emergency response, including environmental, fire, and conditions of abnormal emission and dispersion, exceeding air quality criteria,
- providing access to immediate measures to protect human health and the environment, and
- respecting the polluter pays principle.

Anti-corruption

commercetools promotes integrity and ethics in all aspects of its activities and maintains a zero-tolerance policy on corruption. We expect that our partners do not engage in any form of corrupt practices, including extortion, fraud, bribery, facilitation payment, or money laundering whether direct or indirect. We expect our business partners to maintain adequate procedures for

preventing any of its employees, suppliers, agents or other business partners from undertaking any conduct that in any way would give rise to an offence under applicable anti-corruption laws, rules and regulations. We expect our business partners to ensure that business is conducted in a manner that does not violate UN, EU, UK or US trade sanctions and to inform commercetools should they ever become subject to international sanctions.

Report

Each of us is responsible for detecting and reporting violations of this Code of Conduct. Any suspicion of a breach of the rules or other issues that may constitute a breach of this policy should be reported as soon as possible. If you are unsure whether a particular action or treatment may constitute a breach of the rules, please raise this so that it can be investigated further by commercetools.

Reports can be made to any member of the Compliance Team. To report a possible violation to the Compliance Team, use compliance@commercetools.com. Reports will be entered directly into the Compliance Team's mailbox.

Anonymous reports

If you would like to make an anonymous report, you can do so using our web platform at the following link: <https://report.whistleb.com/en/commercetools>. If you use this option, please follow the instructions at this webpage. We will also follow up on these reports with the appropriate care.