

# DoubleCloud Supplier Code of Conduct

## Introduction

This Supplier Code of Conduct (hereinafter - "Code") of DoubleCloud (hereinafter - "DoubleCloud ") includes the business principles to be followed by all counterparties, including consultants, agents, distributors and other individuals or entities working for DoubleCloud or with DoubleCloud (hereinafter - "suppliers"). A supplier's failure to comply with these principles within the framework of our joint activities may result in the impossibility of their continued business relationship with DoubleCloud . We expect that our suppliers will inform all employees and subcontractors that shall interact with DoubleCloud about the contents of this Code.

DoubleCloud is committed to the highest standards of business ethics. Therefore, this Code shall be treated as inextricably linked with [the DoubleCloud Code of Business and Corporate Conduct](#) and that DoubleCloud commits to in order to be a reliable and honest partner for their suppliers. We are committed to building mutually beneficial relationships based on openness and mutual respect. We want to have common views and intentions with our partners, including benefiting society and caring about the environment.

## Main points about the Code

<b>1. What are the foundations for the Supplier Code of Conduct?</b>  The Code is grounded in the <a href="#">DoubleCloud Code of Business and Corporate Conduct</a> . We expect that both our suppliers and their employees demonstrate the same level of commitment as we do. This Code and <a href="#">the DoubleCloud Code of Conduct</a> are based on the principles set forth in the applicable laws and the following international documents: <a href="#">Universal Declaration of Human Rights</a> , <a href="#">United Nations Guiding Principles on Business and Human Rights</a> , <a href="#">ILO Conventions</a> , <a href="#">Principles of the UN global contract</a> .	<b>2. What do I do if the Code's principles are inconsistent with the applicable laws?</b>  If the Code includes stricter requirements, our suppliers and we shall follow the provisions of the Code. If the requirements of applicable laws are stricter, we shall follow the laws.  We made sure that this Code could be used as a universal guideline in most cases, in line with the requirements of applicable laws.
<b>3. Will DoubleCloud check compliance with the Code?</b>  We trust our partners that have assured us that they share the principles of business conduct set forth in the Code and we are happy to familiarize ourselves with their public reporting. However, DoubleCloud reserves the right to implement audit procedures. For example, DoubleCloud may initiate an audit. The audit, its scope, and other details shall be agreed with the supplier in advance.	<b>4. How do I report a violation of the Code?</b>  Our hotline is available 24/7 at <a href="mailto:hotline@ethics.online">hotline@ethics.online</a> The hotline guarantees the confidentiality of all reports and complaints.

## Key principles

### 1. Fair and honest business practices

#### Competition

Our suppliers must aim to maintain an open, honest, and pro-competitive environment in compliance with applicable anti-monopoly laws. They do not tolerate unfair competition, avoid entering deals that restrict competition, including agreements on market-sharing based on territory, product volume or

range, where both buyers and sellers are involved. Our supplier shall not share confidential information with our competitors or use other anti-competition practices.

### **Anti-corruption**

Corruption is a criminal offense in all countries where DoubleCloud operates. We strictly prohibit any form of corruption: bribes, payoffs, and other illegal payments to gain or maintain entrepreneurial advantages.

We select our counterparties impartially, taking into account the competitiveness of provided prices, quality of products or services, and reliability of future supply. We never offer or accept any kinds of illegal or inappropriate payments, gifts, or services. We prohibit such actions, even if in certain DoubleCloud regions of presence such payments are considered acceptable. Our suppliers shall keep in mind that local customs and practices are not an excuse for a criminal offense.

Our suppliers, their affiliated companies, their employees, representatives and other persons involved in relationships with DoubleCloud may not offer, give, request, or accept money, valuable gifts, services or other payments in order to maintain entrepreneurial advantages or receive more favorable treatment from or on behalf of DoubleCloud .

If our suppliers suspect an actual or possible violation of the principles set out in this section, they shall immediately report their suspicions to DoubleCloud . To do this, they must send an email to: [hotline@ethics.online](mailto:hotline@ethics.online)

### **Business gifts and hospitality**

We expect that any gift and hospitality that we receive from our suppliers or that our suppliers give or accept when doing business with or on behalf of DoubleCloud comply with the following principles:

- They are reasonably priced.
- They don't create any conflict of interest.
- They are legitimate.
- They comply with local customs and business rules.
- The receiver won't feel obligated to give a return gift.
- They are not a bribe or payoff (and don't give anyone any reason to think they are).
- They are not extorted by the receiver.

DoubleCloud has approval procedures that we follow when giving or receiving gifts and hospitality.

We never accept any money or cash equivalents (such as gift certificates or e-money cards), regardless of their nominal value, from our business partners.

For more information about how we receive and give gifts at DoubleCloud (including applicable limits), see [the Code of Business and Corporate Conduct](#).

### **Conflicts of interest**

Our suppliers, their affiliated companies, their employees, representatives and other entities or individuals involved in doing business with DoubleCloud aim to avoid any conflict of interest regarding DoubleCloud .

A conflict of interest is understood as any circumstance that may put into question the company employees' capacity to act objectively in the interest of the employer and the deal. Conflicts of interest include situations where our suppliers, their affiliates, employees, representatives, contractors and other persons involved in relationships with DoubleCloud :

- Are immediate family members of DoubleCloud employees who make decisions or participate in the execution or performance of contracts related to doing business with the supplier.
- Are full-time or part-time DoubleCloud employees or individuals that provide any services to DoubleCloud .
- Have substantial influence on DoubleCloud .
- Are under substantial influence of DoubleCloud .

We also consider a conflict of interest to be any situation where the objectivity of making business decisions while interacting with DoubleCloud might be affected.

If our suppliers learn about any possible conflicts of interest, they shall take measures to eliminate the situation and promptly notify DoubleCloud about this in writing. To do this, they must send an email to: [hotline@ethics.online](mailto:hotline@ethics.online)

### **Money laundering**

We expect our suppliers to fully and accurately document all their business and commercial operations and reflect this in their accounting reports in accordance with applicable laws. Moreover, our suppliers shall not be involved in money laundering or the facilitation thereof.

### **Insider trading**

Our suppliers shall not use confidential information regarding DoubleCloud to enter any insider deals. They also undertake not to disclose such information to other people who might use such information to trade securities.

### **Confidentiality**

Our suppliers shall treat any business, technical, commercial, and financial information about DoubleCloud, their products, technologies, and partners as confidential. The suppliers shall endeavor to protect DoubleCloud confidential information: they shall use it only for the purpose of performing their obligations to DoubleCloud, they shall not publish, transfer, or disclose it to any entities or individuals without prior permission from DoubleCloud. While doing business with DoubleCloud, our suppliers aim to avoid any unauthorized use of confidential information of third parties and neither disclose nor hand over such information to DoubleCloud without the prior permission of such third parties.

### **Personal data protection**

DoubleCloud carefully protects the data of their employees, users and other individuals and treats such data with absolute care. Our suppliers must comply with laws about personal data protection while collecting, storing, editing, using, transferring, and otherwise processing personal data when doing business with or on behalf of DoubleCloud. For example, when processing personal data, the supplier aims to follow the principles of legitimacy, security, and confidentiality of data, fairness and transparency of data processing, data minimization, and data accuracy. The supplier intends to limit the purposes of processing and timeframes of storing personal data, and controls actions with data.

### **Intellectual property**

DoubleCloud respects the intellectual property rights of other entities and individuals and expects that their own intellectual property rights are respected. Our suppliers shall not use DoubleCloud intellectual property (including DoubleCloud software products, databases, patented solutions, trademarks, and logos) without prior written permission. While doing business with DoubleCloud, suppliers shall avoid the unauthorized use of intellectual property of third parties.

### **Information disclosure**

We expect that our suppliers adhere to the principle of transparency and aim to regularly inform stakeholders about the results of their activities, including sustainable development. For example, by providing public reporting. If the information may not be publicly disclosed, we expect our suppliers to be willing to share such data and materials with DoubleCloud if requested (provided that no confidentiality restrictions apply to such information).

## **2. Respect for human rights and freedoms**

### **Prohibition of child labor and forced labor**

Our suppliers do not use illegal child labor and employ only persons of the age legally permitted for employment.

Our suppliers do not tolerate any forms of forced labor or slavery stipulated in the national law and applicable international documents (e.g., [ILO's Forced Labor Convention \(No. 29\)](#)). Our suppliers aim to build their relationships with employees based on voluntary agreements. They neither take part in nor

encourage human trafficking and take measures to eliminate human trafficking in the context of their business relationships.

#### **Non-discrimination and diversity**

DoubleCloud deems discrimination in any form unacceptable, provides equal opportunities, and sees value in diversity. The same principles are expected to be followed by our suppliers. They comply with all applicable laws and prevent discrimination during hiring or employment. They do not tolerate any harassment or persecution on any grounds, including nationality, gender, age, race, political or religious views, sexual orientation, and other characteristics. Our suppliers make efforts to ensure equal opportunities for their employees and partners, fosters social and cultural diversity and, where possible, aim to cooperate with companies of different sizes, with individual entrepreneurs and self-employed partners.

#### **Non-harassment**

Our suppliers do not tolerate any forms of sexual harassment, i.e., unwelcome sexual advances towards other persons.

#### **Fair remuneration**

Our suppliers ensure compliance with all the requirements of applicable laws regarding wages, benefits and entitlements, and overtime payment. They aim to offer fair remuneration in a timely manner and in full, ensuring a dignified human existence for the person and their family.

#### **Respect to the right to rest**

Our suppliers demonstrate respect and ensure the legally enshrined right to rest for their employees. They comply with the provisions of all applicable laws regarding working hours and overtime duration.

#### **Trade union freedoms**

Our suppliers recognize and respect the right of their employees to freedom of association and collective bargaining.

### **3. Ensuring occupational health and safety**

#### **Enabling safe working conditions**

Our suppliers aim to ensure working conditions that minimize risks to health and safety. They maintain working equipment in operable condition, provide health and safety guidance, inform employees about risk factors, respond to incidents and eliminate their effects, maintain applicable reporting and take other measures to observe requirements of the laws and to improve working conditions.

### **4. Environmental responsibility**

#### **Complying with environmental laws**

Our suppliers comply with applicable laws on environmental protection, including regulations on hazardous materials, byproducts, and the emission and dumping thereof in the air and water.

#### **Rational use of resources**

DoubleCloud takes their commitments regarding environmental protection seriously and aims to use natural resources rationally. Our suppliers share the principles of rational consumption, aim at optimal spending of energy, water, raw materials, and other resources, and are mindful of climate change mitigation. They also, whenever possible, give preference to less environmentally harmful packing materials.

#### **Handling hazardous materials**

Our suppliers do not use, in their technological processes, any chemicals or other materials that pose a hazard to human health and the environment, referring to lists of such chemicals included in applicable state standards and agreements signed with DoubleCloud . Our suppliers ensure proper processing, storage, and disposal of hazardous materials.

### Final statements

We will review this Code on a regular basis to account for the best practices and possible legislative changes.

You can send your questions about the contents of the Code to Procurement department contact.