

## Code of Conduct for suppliers and business partners

Omnicom Media Group Germany GmbH and its subsidiaries set out below their requirements and principles for cooperation with suppliers and business partners, in particular for compliance with ethical and moral standards, applicable law and integrity, and expect them to comply with and implement the principles listed.

### Human rights

Omnicom Media Group Germany GmbH and its subsidiaries are committed to respecting internationally recognised human rights and see sustainable and responsible action as an important basis for cooperation with our suppliers and business partners.

In particular, our suppliers and business partners commit to:

- Respect the regulations and standards (including those of the International Labour Organisation - ILO) applicable worldwide for the protection of human rights. This includes, in particular, that they do not use forced labour or child labour and reject any knowing use of forced labour and child labour as well as any form of modern slavery and human trafficking.
- **Employ staff in accordance with local legislation, in particular on equal treatment and discrimination, and not to allow bullying, exclusion or sexual harassment.**
- Cultivate an inclusive corporate culture that ensures inclusion and diversity as well as respectful interaction with each other.
- **Comply with the applicable regulations on working hours and minimum wage.**
- Recognise the fundamental right to form and join trade unions and workers' representative bodies.
- Comply with the applicable legal requirements for occupational health and safety and product safety.

### Environmental protection

Our suppliers and business partners contribute to the protection of people and the environment within the scope of their working environment and the performance of their tasks. All relevant laws and regulations as well as regulations on environmental protection shall be complied with. Our suppliers and business partners are required to conduct their business in cooperation with us with the awareness of conserving natural resources as far as possible and continuously improving energy-related performance. We have laid down our claim in our energy and environmental policy.

### Transparent business relations

We do not tolerate any form of corruption and bribery.

- Remuneration of consultants, agents and other commissioned intermediaries may not serve to provide business partners, customers or other third parties with inadmissible advantages.
- Invitations and gifts as well as other benefits or advantages of any kind may only be accepted or granted if they are reasonable and are not made in expectation of an impermissible consideration or other preferential treatment.
- Our business partners make their decisions on the basis of objective criteria and are not influenced by personal interests and relationships.

- Commissions, remuneration or other benefits that exceed the level of insignificance and are granted to our business partners in the course of their work for us must be disclosed to us immediately.

### **Fair market conduct**

Our suppliers and business partners comply with all relevant competition law requirements and avoid actions that may restrict or limit competition in an impermissible manner. In particular, they do not enter into any agreements or arrangements that influence prices, conditions, strategies or customer relations, especially participation in tenders.

All applicable laws governing the import and export of goods, services and information, as well as applicable embargoes and sanctions, will be complied with.

### **Protection of trade secrets and data/information security**

Our suppliers and business partners maintain the confidentiality of business and trade secrets entrusted to them by us or our customers, even beyond the contractual relationships.

Our suppliers and business partners comply with all applicable laws on the protection of personal data, in particular of employees, business partners and customers.

They will always be in control of our sensitive content and will encrypt sensitive information in transit and at rest, and reduce access rights to sensitive information to the minimum in order to detect potential data leaks more quickly.

### **Intellectual property**

Our suppliers and business partners respect the know-how, patents and copyrights of us and third parties. Neither use them nor pass on corresponding information to third parties without prior express written consent from us.

### **Accounting and records**

We expect honest and accurate accounting and recording of information from our suppliers and business partners in order to make responsible business decisions.

### **Implementation and enforcement/legal consequences of violations**

Our suppliers and business partners shall bring this Code of Conduct to the attention of their employees and their own suppliers or business partners in an appropriate manner and at specified intervals and shall ensure compliance with it.

If non-compliance is detected, the business partner is obliged to implement appropriate remedial measures.

In the event that our suppliers or business partners do not comply with the basic principles set out in this Code of Conduct, we reserve the right to terminate the business relationship by extraordinary notice.

### **Complaint management/follow-up measures**

We have established a complaints management system that allows our suppliers and business partners, including the entire supply chain, as well as other external parties, to submit all types of complaints, including potentially illegal acts and indications of any criminal offences committed in the course of their activities, through the existing whistleblowing system.

Our business partners do not tolerate any discrimination against persons who report violations of the principles set out in this Code of Conduct.

Whistleblowers can report potential misconduct via our whistleblowing system CONFIDENTIAL. Details on the submission of whistleblowing reports and their subsequent handling can be found in our Whistleblower Policy via this [link](#).

If we receive substantiated complaints, the supplier or business partner concerned agrees to work with us to develop a scheduled action plan that must lead to the termination of the substantiated complaint.

If these planned and scheduled measures do not lead to the defined goal or do not lead to the defined goal within the envisaged time frame, we reserve the right to terminate the business relationship by extraordinary notice.

If we identify an imminent danger with regard to one of the principles at a supplier or business partner, the supplier or business partner will immediately initiate measures to stop it and keep us informed of the progress of the measures.

We reserve the right to audit suppliers or business partners at annual intervals with regard to their supply chain management, either directly or through a commissioned third party. The supplier or business partner can exempt itself from this by providing evidence of corresponding, certified management systems.