

WELCOME

to AdEx Partners' Supplier Code of Conduct



We welcome you as a valued partner in our supply chain to jointly promote a business environment shaped by fairness, sustainability and integrity. Together, we drive positive impact and are shaping a more inclusive, sustainable, and human-centered digital world.

AdEx Partners recognizes its social responsibility and commits itself to conducting business in a lawful, ecologically, and socially responsible manner. The integrity of our suppliers is crucial in this process, and we expect you to fulfill all relevant legal and ethical requirements. This Supplier Code of Conduct outlines the standards that AdEx Partners requires for responsible procurement.

This Supplier Code of Conduct applies to all entities of AdEx Partners. The following requirements apply to all suppliers, subcontractors, and service providers, hereinafter referred to as 'suppliers', engaged with AdEx Partners, regardless of their location.

Thank you for your commitment.

A handwritten signature in black ink, appearing to read "Stefan Rieder".

Stefan Rieder
Chief Executive Officer

A handwritten signature in blue ink, appearing to read "Judith Huth".

Judith Huth
Chief Operating Officer





Human Rights

We believe that every individual deserves to be treated with dignity, fairness, and respect. We are committed to upholding internationally recognized human rights and labor standards, and we strive to create working environments, both within our organization and across our supply chain, that are inclusive, safe, and equitable.

We therefore expect our suppliers to actively protect human rights and ensure fair working conditions throughout their operations and supply chains.

1.1 No Child Labor

Suppliers must not employ children below the statutory minimum age and must comply with ILO Conventions 138 and 182. At AdEx Partners, protecting children's rights is non-negotiable. We expect suppliers to view this not just as a legal requirement, but as a fundamental human rights commitment.

1.2 No Forced Labor

All employment must be freely chosen. Suppliers must not engage in forced labor, servitude, or human trafficking. AdEx Partners considers freedom from coercion a basic ethical standard, and we expect suppliers to actively ensure the dignity and autonomy of all workers.

1.3 Fair Pay and work-life balance

Suppliers must ensure that wages comply with EU laws and industry standards. At AdEx Partners, we see fair compensation and work-life balance not merely as legal obligations but as essential components of responsible business. In particular, we encourage suppliers to foster work environments that value employee well-being, offering flexible arrangements and reasonable workloads wherever feasible.

1.4 Diversity and ban on Discrimination

Suppliers must not discriminate based on race, gender, religion, nationality, disability, sexual orientation, or other protected characteristics. Suppliers should actively promote gender equality, inclusion, and fair treatment. Diversity, equity and inclusion is at the core of our business at AdEx Partners, and we expect our supplier to give it the same level of importance.

1.5 Freedom of Association and Collective Bargaining

Suppliers must respect employees' rights to organize and engage in collective bargaining. We at AdEx Partners believe in the importance of giving our employees the right to be heard and thus expect suppliers to foster open, constructive dialogue with their workforce.

1.6 Occupational Health and Safety

Suppliers must provide a safe and healthy work environment, ensuring compliance with EU occupational safety laws and international human rights standards. Beyond compliance, AdEx Partners views occupational health and safety as a reflection of respect for people. We therefore expect suppliers to adopt a culture of continuous improvement in health and safety practices.

1.7 Rights to Property and Security Personnel

Suppliers must respect property rights and ensure security personnel adhere to human rights standards.

1.8 Human Rights and Risk-Based Due Diligence

Suppliers are expected to conduct human rights and risk-based due diligence in line with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidelines. This involves identifying, assessing, and mitigating potential risks related to fair working conditions, ethical treatment of individuals, and other relevant issues across their supply chains. We encourage a proportionate and practical approach tailored to the supplier's industry, size, and specific risk exposure, recognizing the need for flexibility while promoting responsible and ethical business conduct.





Environment

At AdEx Partners, we recognize our responsibility to protect the environment and contribute to a sustainable future. We are committed to reducing our ecological footprint and promoting climate-conscious practices across all areas of our business.

We therefore expect our suppliers to operate in an environmentally responsible manner, minimize their environmental impact, and support the transition to a low-carbon, resource-efficient economy.

3.1 Environmental Protection

One of our main pillars at AdEx is our planet, which is why environmental responsibility is a strategic priority for us. We therefore require our suppliers to conduct their business in an environmentally responsible manner, complying with relevant EU regulations and encourage them to go beyond compliance and actively work to reduce their environmental impact.

3.2 Sustainable Resource Management

At AdEx, we believe that resource efficiency is key to long-term value creation, and we urge suppliers to treat it as a shared responsibility. This is why we want our suppliers to:

- Follow circular economy principles and to minimize waste, emissions, and resource consumption where practical.
- Comply with EU sustainable resource management regulations.

We ask suppliers who have a contractual relationship with AdEx Partners to ensure that their operations run on 100% green electricity by 2030 and, if not available, maximize the share of green electricity they use to run their operations.

3.3 ESG Data

Suppliers shall establish, maintain and share upon request ESG data related to the product/service it offers with the best possible data quality level based on the relevant sustainability standards.

3.4 Biodiversity and Ecosystem Services

Suppliers should consider the impact of their operations on biodiversity and take reasonable actions to mitigate negative effects if they have identified a significant impact.

3.5 Handling Hazardous Substances

Suppliers must handle hazardous substances responsibly, ensuring compliance with EU safety regulations. However, we encourage suppliers to go beyond legal obligations and implement best practices in chemical management to protect people and the environment.





Ethical Business Practices

Trust is the foundation of everything we do at AdEx Partners. We are committed to conducting business with integrity, transparency, and accountability. Ethical behavior is not only a legal obligation, it is a reflection of our values and a prerequisite for long-term partnerships.

We therefore expect our suppliers to uphold the highest standards of ethical conduct, comply with all applicable laws, and foster a culture of integrity in their business practices.

2.1 Anti-Corruption

Suppliers must comply with EU anti-corruption laws and must not engage in bribery or fraudulent practices. AdEx Partners firmly opposes corruption and expects suppliers to share this commitment; not just as a matter of law, but as a cornerstone of ethical business conduct.

2.2 Fair Competition

Suppliers must adhere to fair competition and anti-trust laws, refraining from anti-competitive practices. AdEx Partners strongly supports open markets and fair play. We expect suppliers to uphold these principles not just in form, but in spirit.

2.3 No Money Laundering

Suppliers must comply with EU applicable laws against money laundering and financial misconduct and take proactive steps to prevent financial misconduct. For AdEx Partners, integrity in financial practices is a foundational value, and we expect our suppliers to uphold this principle proactively.

2.4 Data Protection

At AdEx Partners, protecting sensitive data is not just a compliance issue, it reflects our broader commitment to privacy, trust, and accountability. We thus expect suppliers to safeguard personal and business data in accordance with EU data protection laws and to treat data protection as a critical ethical responsibility.

2.5 Whistleblower Protection and Complaint Mechanisms

Suppliers must provide accessible, confidential mechanisms for reporting violations without retaliation. At AdEx Partners, we see strong whistleblower protection as vital to a culture of transparency and accountability. We expect suppliers to treat this not only as a compliance issue, but as an opportunity to build trust internally.

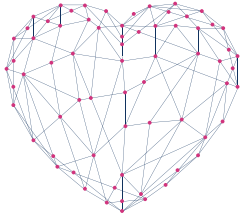
2.6 Compliance

AdEx Partners reserves the right to request information on compliance with this code where there is a legitimate reason to do so. In exceptional cases, a review may take place, whereby we rely on partnership-based and transparent communication.

2.7 Suppliers adherence and communication

All suppliers that have a contractual relationship with AdEx Partners must communicate the ethical standards reflected in this code to their subcontractors and require their adherence to ensure consistent application throughout the supply chain.





References

This Code is based on internationally recognized principles such as the Universal Declaration of Human Rights, the UNGC guidelines on developing a supplier code of conduct, the UN guiding principles on business and human rights, the ISO 20400 and the ILO Declaration on Fundamental Principles and Rights at Work.

Contact Information

Please do not hesitate to reach out to your contact person at AdEx Partners if you have any questions regarding this Supplier Code of Conduct. We will be happy to support you.

We ask our suppliers to inform us of possible violations of this code by reaching out to their contact person at AdEx Partners or to adex-legal@adexpartners.com.

This Supplier Code of Conduct does not create third-party rights or claims against AdEx Partners. The company reserves the right to update this Code as necessary.

Imprint

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