

# Supplier Code of Conduct Supplier Code of Conduct

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## Preamble

Founded in 2000, idealo<sup>1</sup> is one of the leading price comparisons for products and prices as well as travel and flight offers in Europe. On idealo, users can compare more than 500 million offers. Together with our subsidiaries Comparado and Ladenzeile, we pursue our purpose of driving positive change in the e-commerce market. Since 2006, idealo has been part of Axel Springer SE.

As a company, we want<sup>2</sup> to create the conditions that make good actions and good decisions possible: in terms of consumption, climate protection, social commitment - wherever it comes to being responsible and honest, tolerant and transparent. This is what we strive for as an independent comparison platform for our users and as an employer for our employees. Current information on this can be found on our website at [Sustainability](#).

We respect the values of the [Universal Declaration of Human Rights](#) and are committed to good corporate governance. We are committed to complying with internationally recognized social standards, in particular to protecting the legal positions set out in the German Supply Chain Duty of Care Act. In particular, the [UN Global Compact](#) and the [core labor standards of the International Labor Organization \(ILO\)](#) serve as the basis for this. We also support the [UN Guiding Principles on Business and Human Rights](#) and strive to incorporate these into our own guidelines and processes. Our idealo Code of Conduct, which applies to all employees, is an expression of this endeavor. We also expect our business partners to observe these principles. In order to guarantee human rights, labor rights and environmental protection, our suppliers undertake to protect the legal positions set out in the Supply Chain Duty of Care Act. We disclose our minimum requirements for our business partners in this Supplier Code of Conduct. We consider the flawless implementation of and compliance with our Supplier Code of Conduct to be a prerequisite for successful cooperation.

If its requirements go beyond the locally applicable laws and regulations, this document is binding. If there are any contradictions between the idealo Supplier Code of Conduct and the local legal provisions, our business partners must inform us immediately.

Our business partners within the meaning of the idealo Supplier Code of Conduct are all third parties who work for, on behalf of or together with idealo. These include suppliers, sales partners, consultants, brokers, subcontractors, commercial agents and freelancers.

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<sup>1</sup> In this Code of Conduct, *idealo* always means idealo internet GmbH and all companies controlled by it, in particular Comparado GmbH and Ladenzeile GmbH

<sup>2</sup> We always refer to all employees, managers and members of the executive bodies of idealo and all controlled companies. We use respectful and gender-appropriate language that includes all gender identities, unless this is explicitly stated. The generic masculine is used for groups that are not individually named, such as "suppliers" or "partners".

## Social responsibility

### Human rights

Our business partners respect the dignity of every human being

Just like us at idealo, our business partners respect and support compliance with internationally recognized human rights and emphasize that everyone, without exception, is entitled to the rights and freedoms proclaimed in the United Nations Guiding Principles on Business and Human Rights. They ensure that high human rights standards apply within their company, but also with their direct suppliers. Tolerance towards those with different opinions and a commitment to the principles of democracy and the rule of law form the basis of our cooperation.

### Dealing with each other

Our business partners create a working environment characterized by respect - discrimination and harassment have no place

Our business partners do not tolerate any form of discrimination. Everyone has the same opportunities to develop and progress. In particular, national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology and marital status play no role.

Our business partners are committed to a trusting and respectful working environment and do not tolerate sexual, discriminatory or other forms of harassment, bullying or intimidation in the workplace.

### Protection of children

Our business partners are committed to the effective abolition of child labor

Our business partners do not employ children or young people in contravention of the statutory provisions. If the employment of children and young people is permitted, our business partners shall ensure that such employment is not detrimental to their physical and mental development. Their safety and health must be protected by appropriate measures.

## **Fair working conditions**

Our business partners guarantee fair working conditions

We expect our business partners to behave in accordance with the law and to observe appropriate social and legal standards.

Wages and salaries as well as social benefits granted correspond to at least the respective national legal minimum standards or are higher. The working hours of our business partners must also at least comply with the applicable laws, industry standards or the core labor standards of the International Labor Organization. Our business partners ensure that there is no unequal treatment. Unequal treatment exists in particular if unequal pay is paid for work of equal value.

Furthermore, our business partners respect the right of employees to form or join an employee representative body and to be active in it. The exercise of these rights must not lead to discrimination or retaliation against employees.

Any form of forced labor, i.e. any work that is required of a person against their will and under threat of punishment, as well as forms of modern slavery and human trafficking, is strictly rejected by our business partners. All employees have the freedom to terminate their employment relationship with reasonable notice.

## **Occupational safety**

Our business partners ensure health in the workplace

Our business partners take the necessary measures at all workplaces to prevent accidents at work and work-related illnesses, whether physical or mental. This is achieved, among other things, through appropriate safety standards in the provision and maintenance of workplaces, workstations and work equipment.

If private or public security forces are employed to protect a business project, our business partners must ensure through training and monitoring that the basic rights of employees are respected. In particular, this means a ban on torture and cruel, inhuman or degrading treatment as well as injury to life and limb. Furthermore, the freedom of association and unionization must not be impaired.

## Data & IT

### Data protection

Our business partners protect data

Data protection law protects personal data (e.g. name, email address, account data, customer number, address, date of birth) and thus the personal rights of customers, users, business partners and employees. All parties involved must handle this data responsibly and comply with the data protection regulations and the principles for processing personal data set out therein. When collecting, storing, processing or transferring personal data of employees, customers or other third parties, our business partners ensure the utmost care and strict confidentiality, as well as compliance with applicable laws and regulations on data protection and data security. More detailed regulations on data protection requirements can also be found in the agreements with our suppliers.

### Information security

Our business partners deal responsibly with cyber risks

Reliable information security is crucial for the trust we place in our business partners. The data we provide and process represents significant values. At the same time, they are easy to disseminate and duplicate. In order to adequately protect this data from cyber risks such as destruction, theft, unauthorized access, unauthorized disclosure or other misuse, each of our business partners takes appropriate security precautions and informs affected parties promptly of any cyber attacks. We define further specific requirements in contracts directly with our suppliers.

## Compliance with laws

### **Corruption prevention**

Good business is important - but not at any price

Our business partners do not bribe and do not accept bribes, neither in their dealings with public officials nor in their business dealings. They make business decisions for objective and comprehensible reasons in the interests of the company and avoid even the mere appearance of undue influence, for example through benefits or other advantages. Our business partners behave fairly, correctly and transparently towards partners and business contacts.

Our business partners do not accept gifts or other benefits (e.g. invitations) that could influence them inappropriately in their decisions. Conversely, they also do not offer benefits in order to inappropriately influence their business partners or other contacts in their favor.

### **Antitrust law**

A free market economy and fair competition are the cornerstones of our economy

Promoting functioning and unhindered competition is a matter of course for us. Our business partners therefore comply with antitrust law. They do not enter into any agreements or make any other arrangements with competitors, suppliers or other companies that impair fair competition. In particular, they do not enter into any agreements on prices, the division of markets (e.g. according to sales territories, customers or products) or other market behavior and corporate strategies. Our business partners do not unfairly call for boycotts and ensure that they do not discriminate in an anti-competitive manner - either in the sale or purchase of goods and services.

### **Conflicts of interest**

Our business partners report potential or actual conflicts of interest

Conflicts of interest can lead to business decisions not being made impartially. Our business partners are therefore obliged to disclose potential or actual conflicts of interest in good time and to resolve them immediately.

## **Foreign trade law & money laundering**

Terrorist financing and money laundering are not facilitated

Our business partners observe all relevant economic sanctions and comply with all foreign trade restrictions. Dealings with persons, companies or organizations that are associated with terrorism or drug trafficking or whose funds are derived from criminal activities is not tolerated.

## **Confidentiality and secrecy**

Our business partners protect business secrets

Our business partners ensure that all information and documents that are not suitable or intended for disclosure to third parties are treated as strictly confidential and are protected against unauthorized access and misuse.

## **Insider trading**

Insider information is not exploited for personal gain

Cooperation between idealo and our business partners may result in important information for the capital market. Anyone who, as our business partner, has confidential information which, if it were to become public knowledge, would be capable of significantly influencing the price of shares etc. relating to idealo or one of its affiliated companies or the business partner in question (so-called "insider information"), does not buy or sell these shares and does not pass on this information without authorization.

## Climate & Environment

### Climate protection

Committed to the environment

idealo has set itself ambitious goals for climate protection. We want to reduce our CO<sub>2</sub> footprint to net zero by 2045. Protecting the environment is a core corporate value for us.

Our business partners should also set themselves targets and take appropriate measures to avoid or minimize risks for the environment. In all phases of production, our business partners ensure that optimal environmental protection is guaranteed especially through avoidance, reduction and reusability. We expect reasonable efforts to be made to avoid or minimize the consequences of accidents that may have a negative impact on the environment.

We use natural resources sparingly and promote the sustainable use of these resources. We want to minimize the impact of our work on people and nature. We also expect this attitude from our business partners. Land, forests and bodies of water that serve as a person's livelihood must not be illegally cleared or taken away for the purpose of acquisition, development or other use.

Our business partners avoid harmful soil changes, water pollution, air pollution, harmful noise emissions and excessive water consumption that significantly impair the natural basis for the preservation and production of food, deny or impede access to clean drinking water and sanitary facilities or destroy or damage health. In particular, they comply with the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Control of Transboundary Imports and Exports of Hazardous Wastes and their Disposal.



## Implementation

### Responsibility of our business partners

We make the idealo Supplier Code of Conduct an integral part of the contractual agreements with our business partners. Our business partners guarantee the implementation of and compliance with our Supplier Code of Conduct in the contractual relationship with us. In this context, our business partners pass on the Supplier Code of Conduct to all employees who work for us and work towards compliance. We also see it as our business partners' duty to pass on these regulations to their business partners whom they employ and commission in relation to their work for idealo (e.g. as subcontractors) and to work towards compliance with them.

We reserve the right to check compliance with the Supplier Code of Conduct. For this purpose, our business partners must provide information in response to inquiries and, if necessary or if risks are identified by idealo, actively participate in the development of remedial measures. If necessary, our business partners shall grant access to documentation and operating procedures for the purpose of the respective audit.

In the event of non-compliance, our business partners are obliged to initiate the necessary remedial measures immediately and independently.

### Reporting and dealing with compliance violations

Violations of laws, guidelines and other regulations must be recognized in good time in order to prevent damage to idealo and our business partners and to ensure fair and trusting cooperation. If our business partners become aware of a violation of this Supplier Code of Conduct, they must report this to idealo immediately. They shall cooperate in subsequent clarification measures.

idealo expects its business partners to enable their employees to raise grievances and concerns without having to fear disadvantages or even retaliation.

At idealo, employees and external persons have the opportunity to submit a report - also anonymously - via our [Electronic Whistleblower Tool](#). The electronic whistleblower system is managed by employees from the idealo compliance team. If a violation of the idealo Supplier Code of Conduct and/or applicable laws is suspected, the business partner concerned will provide clarification or cooperate in clarification measures on the part of idealo. Possible reactions to detected violations (not exhaustive) are the request to remedy the violation, assertion of claims for damages up to termination of the contract. idealo reserves the right to terminate the



business relationship in compliance with the contractual or legal provisions in the event of a serious violation of our Supplier Code of Conduct.

## Contact us

### Compliance Officer

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