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Code of Conduct

Suppliers / Partners

At EOS, our suppliers/partners/service providers (suppliers) are not only chosen and assessed according to economic criteria. We also pay close attention to environmental protection, compliance with human rights, labour and social standards, as well as anti-discrimination and anti-corruption measures. We expect our suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social and corporate governance standards (ESG standards). We also expect our suppliers to use their best efforts to implement these standards with their suppliers and subcontractors.

Version 1.0
July 2023

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Introduction

As a member of the EOS Group which is active in the business field of debt purchase and collection, we are committed to conduct our business in an ethical and responsible manner, being aligned with our Compliance Management System helping us to avoid regulatory risks. Our suppliers/partners play an important role in helping us achieve this goal. This code of conduct is aligned with the United Nations Global Compact Principles, our own internal Code of Conduct as well as respective Otto Group requirements and respective industry standards set by BDIU and FENCA. We keep ourselves committed to the highest standard and expect our suppliers/partners/service providers to follow similar standards as well.

Human Rights:

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour:

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment:

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption:

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

EOS expects all suppliers/partners/service providers as well as their subsidiaries and subcontractors to integrate this Code of Conduct into their business relationship with EOS or to have their own Code of Conduct with comparable contents and to sensitize all their employees and teams accordingly, or to have their own Code of Conduct that presents the contents analogously. Suppliers are therefore expected to ensure that the principles of this Code are communicated to all their suppliers and business partners.

In order to maintain the applicability of comparable standards, we expect our partners either to sign the EOS Supplier Code of Conduct or to confirm contractually or otherwise in writing that they have their own Code of Conduct with equivalent requirements.

1 General requirements

1.1 Compliance with Laws and Regulations

Suppliers must comply with all applicable laws and regulations, including those related to debt collection practices, consumer protection, and privacy as applicable. They have to ensure that their operations are in compliance with international human rights standards, including but not limited to the Universal Declaration of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights.

It is not acceptable for suppliers to engage in any form of forced labour, child labour, or other labour practices that violate human rights. They have to ensure that their operations do not contribute to any human rights abuses, including but not limited to discrimination, harassment, or violence.

Suppliers additionally need to ensure that their operations do not harm the environment or negatively impact the health and safety of their employees, customers, or communities. Therefore suppliers need to have appropriate policies and procedures in place to prevent and mitigate any negative impacts on human rights and the environment, and must continuously evaluate and improve their practices to ensure compliance with applicable laws and regulations.

1.2 Business Continuity

It is essential that suppliers have an appropriate business continuity management in place to ensure that their operations can continue in the event of unexpected disruptions, such as natural disasters, cyber-attacks, or other emergencies. Therefore, suppliers must have contingency plans for critical data, business processes and systems, and must regularly test and update their business continuity plans to ensure their effectiveness to ensure timely recovery. In this regard suppliers must ensure that their employees are aware of the business continuity plans and procedures, and are trained to respond effectively in the event of an emergency.

1.3 Training and Development

It is expected that suppliers provide their employees with appropriate training and development opportunities to ensure they are aware of the importance and comply with applicable laws and regulations, including the standards/requirements defined in this CoC. Suppliers must provide ongoing training and support to their employees to promote ethical business practices in general. EOS expects its suppliers to adequately train employees on all main Compliance topics relevant to their business activities, e.g. anti-corruption, data privacy, and human rights to foster a respective compliance culture and to document these trainings adequately.

1.4 Continuous Improvement

Suppliers must continuously evaluate and improve their business practices, including their compliance with laws, regulations and standards including the requirements of this Supplier CoC. We expect our suppliers to:

- conduct regular assessment of operations and supply chain to identify areas for improvement
- engage in regular communication and collaboration with respective stakeholders and to share best practices
- be open to feedback and constructive criticism, and take appropriate action to address any concerns raised
- to address issues identified by implementing appropriate measures

1.5 Reporting and Investigation

Suppliers must promptly report any violations of the standards/requirements defined in this CoC or any suspected unethical behaviour. They must have appropriate policies and procedures in place to enable employees and other stakeholders to report any concerns in a safe and confidential manner. Additionally, suppliers must as well ensure that their employees are encouraged to report any concerns or violations.

EOS will follow up on any reports of non-compliance or suspected unethical behaviour and will take appropriate action as necessary. Suppliers must fully cooperate with any information request and/or investigation conducted either by EOS/Otto Group audit directly or by independent third parties authorized by EOS/Otto Group and must take appropriate remedial action to address any issues identified as well as provide documentary evidence confirming implementation of remedial measures.

With regard to our own Whistleblowing approach, see chapter below.

2 Human Rights

2.1 Ethical Debt Collection

Suppliers, which are involved in EOS debt collection processes, must conduct ethical debt collection practices, always treating debtors with respect and fairness. Suppliers must ensure that their employees follow all applicable laws and regulations related to debt collection practices, and must provide training and support to their employees to ensure compliance with these requirements.

Suppliers must:

- not use deceptive, misleading, or harassing tactics in their debt collection activities.
- ensure that their employees do not engage in any behaviour that could be perceived as threatening or intimidating towards debtors.

- provide clear and transparent information to debtors, including information about their rights and responsibilities, payment options, and any fees or charges associated with the debt.
- ensure that all communication with debtors is fair, respectful.
- monitor and evaluate their debt collection practices to ensure compliance with applicable laws and regulations, and implement any necessary improvements to maintain ethical debt collection practices.

Dos:

- Treat debtors with respect and dignity, and communicate with them in a professional and courteous manner.
- Ensure that employees do not engage in any behaviour that could be perceived as threatening or intimidating towards debtors.
- Provide debtors with clear and accurate information about their debt, including the amount owed, the identity of the creditor, and the options available for resolving the debt. Furthermore, also provide information about their rights and responsibilities ensuring all the communications are fair, respectful and complies with all the applicable laws and regulations.
- Listen to debtors and address their concerns and questions in a timely and respectful manner.
- Work with debtors to develop a repayment plan that is reasonable and affordable, taking into account their financial situation and other obligations.
- Contact debtors via appropriate channels and offer easily accessible and appropriate ways for the debtors to contact you.
- Provide debtors with written confirmation of any payment arrangements or agreements reached.
- Monitor and evaluate the debt collection practices being in compliance with applicable laws and regulations and implement any necessary improvements to maintain ethical debt collection practices.

Don'ts:

- Use threats, harassment, or intimidation to pressure debtors into paying their debts.
- Misrepresent the amount or nature of the debt, the identity of the creditor, or the consequences of non-payment.
- Contact debtors at unreasonable hours or in a manner that is harassing or disruptive.
- Disclose information about the debt to third parties without the debtor's consent, except as required by law.
- Accept gifts or other incentives from debtors, as this could be seen as a conflict of interest.

Suppliers must also ensure that their employees are trained in ethical debt collection practices and fair debtor communication including the Dos and Don'ts as defined above.

2.2 Data Governance and Privacy

EOS expects an assurance that data will be processed lawfully, fairly and in a manner that is transparent to the data subject. Only the data necessary to fulfil the purposes will be processed and the processing will only continue until the purpose has been fulfilled. EOS partners are committed to implementing state-of-the-art data protection and information security standards.

Our suppliers/partners commit to comply with the following requirements:

- ensure that all data collection, processing, and storage is done in a secure and ethical manner
- have appropriate policies, procedures, and measures in place to protect personal information and prevent unauthorized access, use, or disclosure
- ensure resilience against cyber threats
- transfer data only in full compliance with applicable laws and regulations, including international data transfer restrictions
- if applicable, obtain explicit consent from individuals for any data processing activities, and provide individuals with the right especially but not limited to access, correct, or delete their personal data
- regularly assess their data governance and security practices and implement any necessary improvements
- report to the controller all potential or actual security breaches and provide information about the event.

3 Labour

3.1 Working conditions

Suppliers must comply with applicable laws and industry standards regarding working hours, overtime, and rest periods. Suppliers therefore need to promote a healthy work-life balance ensuring that employees are not subjected to excessive working hours and that their right to reasonable rest and leisure time is respected.

We expect our suppliers to provide employees with wages, benefits, and overtime compensation that meet or exceed the minimum legal requirements.

Furthermore, suppliers shall provide a safe and healthy working environment for their employees related to occupational health and safety laws as well as with regard to the general physical and mental well-being. This includes but is not limited to providing appropriate safety training, protective equipment, and measures to prevent accidents, injuries, and occupational diseases. In addition, the supplier needs to foster a supportive work environment that encourages open communication as a mechanism to identify and address the physical and mental health needs of employees.

3.2 Freedom of Association and Collective Bargaining

Suppliers must respect the rights of their employees to freely and voluntarily associate or organize, without fear of retaliation, in accordance with applicable laws. Workers shall have the right to join or form trade unions or employee associations of their choosing.

Suppliers should recognize and respect the rights of workers to engage in collective bargaining, negotiate wages and working conditions, not prevent workers' representatives and union

recruiters from having access to workers in the workplace or from interacting with them and reach mutual agreements with employee representatives, in conformity with applicable legislation.

3.3 Prohibition of Forced Labour and Child Labour

Suppliers shall not use any form of forced, bonded, or involuntary labour. Workers must be free to leave employment after reasonable notice, and there should be no restrictions on their movement. Suppliers should have policies and procedures in place to ensure that all employment is voluntary. Suppliers shall not employ workers who are below the legal working age as defined by applicable laws or international standards, whichever is higher. Suppliers should implement robust age verification processes and maintain appropriate records to ensure compliance.

3.4 Professionalism, including Diversity, Inclusion and Non-Discrimination

Suppliers must conduct themselves in a professional manner, treating all individuals with respect and dignity. Suppliers must ensure that workers are not subject to any form of violence, harassment, and inhumane or degrading treatment in the workplace, as well as threats of violence and abuse, including corporal punishment, verbal, physical, sexual, economic or psychological abuse, mental or physical coercion, or other forms of harassment or intimidation.

Suppliers must promote and uphold diversity and inclusion in their workplace, and ensure that their employees, regardless of their race, ethnicity, gender, sexual orientation, age, religion, disability, or any other characteristic, are treated with respect and provided equal opportunities for professional growth and development. Suppliers must have policies and practices in place to prevent and address discrimination, harassment, and retaliation, and must provide respective training to their employees.

Suppliers must also ensure that their hiring practices are fair and non-discriminatory, and that they provide reasonable accommodations to employees with disabilities or other needs. Suppliers must monitor and evaluate their diversity and inclusion practices to continuously improve their workplace culture and ensure compliance with applicable laws and regulations.

4 Environment

4.1 Environmental Responsibility

Suppliers must operate in an environmentally responsible manner, minimizing their impact on the environment and promoting sustainable practices. Suppliers should have adequate policies and procedures in place to reduce waste, conserve resources, foster biodiversity and minimize their carbon footprint and encourage the digitalization.

Suppliers must also promote sustainable practices in their operations and supply chain, such as reducing greenhouse gas emissions, using renewable energy sources, and minimizing the use of hazardous materials, developing a responsible purchasing and committing to take decisions considering the sustainability.

We expect our partners to take their CO2 footprint into account and upon request to possibly provide respective data to enable EOS to assess its emissions.

5 Anti-Corruption

5.1 Anti-Bribery and Corruption

Suppliers must not engage in any form of bribery or corruption, including offering or accepting kickbacks, gifts, entertainment, or other forms of gratification, that could be perceived as an attempt to influence business decisions.

Suppliers must comply with all applicable anti-bribery and anti-corruption laws and regulations. Suppliers must have appropriate policies and procedures in place to prevent and detect bribery and corruption, and must provide training and support to their employees to ensure compliance with these requirements.

Suppliers must also ensure that all business dealings are conducted with transparency and integrity, and that all financial transactions are accurately recorded and reported.

5.2 Conflict of Interest

Suppliers must avoid any conflict of interest that may arise between their business interests and the interests of EOS. Suppliers must disclose any potential or actual conflicts of interest with regard to EOS in a timely manner.

Suppliers must not engage in any business activities that could be perceived as conflicting with their obligations to EOS. Suppliers must ensure that all business dealings are conducted with transparency and integrity, and that any potential or actual conflicts of interest are resolved in a fair and transparent manner.

With regard to the acceptance of gifts, suppliers must not offer or accept gifts or any other form of gratification that could influence business decisions or create the appearance of impropriety. In cases where gifts are offered or received as a token of appreciation or customary practice, suppliers must ensure that they are of nominal value and do not compromise their integrity or create any conflicts of interest.

6 Whistleblowing

As part of the Otto Group we are fully integrated into the Otto Group Whistleblowing Channel.

The system can be accessed through the following link:

[SpeakUp - BKMS Whistleblowing Tool](#)

In addition we also refer to the Otto Group external Ombudsman:

Dr Rainer Buchert, lawyer

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We encourage all possible stakeholders to report on any potential breach of this Supplier Code of Conduct, laws and regulations and/or respective related policies.

Reports are treated confidential and can be submitted anonymously.

All business partners must guarantee to refrain from discriminatory measures or disciplinary actions against whistleblowers who report potential violations.

7 Contact at EOS

If any question regarding this CoC arises, please get in touch with the Corporate Compliance Department at EOS.

Corporate Compliance

compliance@eos-solutions.com