



## **CODE OF CONDUCT FOR SUPPLIERS**

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## **§ 1 Introduction**

LANCOM Systems GmbH is a leading European manufacturer of network and security solutions for business and the public sector. The portfolio includes hardware (WAN, LAN, WLAN, firewalls), virtual network components, cloud-based software-defined networking (SDN), and solutions for remote & mobile access.

Software and hardware development as well as manufacturing take place mainly in Germany, as does the hosting of the network management. There is a strong focus on trustworthiness and security. The company is committed to products that are free from backdoors and is a holder of the trust mark "IT Security Made in Germany" as initiated by the German Ministry of Economics.

LANCOM was founded in 2002 and has its headquarters in Würselen near Aachen, Germany. Customers include SMEs, government agencies, institutions, and major corporations from all over the world. Since summer 2018, the company has been a wholly owned subsidiary of the Munich-based technology group Rohde & Schwarz.

The Rohde & Schwarz technology group develops, produces and markets a wide range of electronic capital goods. The company's entire product portfolio makes a valuable contribution to a safer and connected world. Customers worldwide rely on Rohde & Schwarz and its leading technology solutions in the fields of test & measurement, secure communications, networks & cybersecurity, and broadcast & media.

Rohde & Schwarz is committed to high enterprise and corporate social responsibility standards, ethical business practices, and compliance with all applicable laws and regulations.

Fair treatment of suppliers and partners as well as economic, environmental, social and human rights aspects and in particular the principles of anti-corruption and fair competition are an important part of the selection process and supplier management.

Rohde & Schwarz has established rules of conduct governing our relationships with our customer and supplier base. LANCOM expects its suppliers to apply comparable principles in their own organizations as a basis for mutual business relationships.

Suppliers hereby agree that their company and their subcontractors respect the principles below, abide by the regulations that govern them, and put the requisite organizational measures in place to ensure compliance:



## **§ 2 Compliance Requirements**

### 1. Legal Compliance

Suppliers agree to comply with all prevailing laws and regulations at the locations at which they operate.

### 2. Einhaltung with ethical standards

Suppliers must not engage in any form of corruption, bribery, money laundering, anti-competitive agreements or other unfair business practices, and shall comply with all applicable national and international embargo, export and import provisions. Suppliers monitor their employees' and subcontractors' compliance with these principles, take appropriate action in any instances of infraction of which they become aware, and take effective action to prevent such infraction.

## **§ 3 Expectations regarding human rights and the environment –**

### 1. Protecting children and minors and safeguarding the rights of other vulnerable individuals

LANCOM strictly opposes any form of child labor. All working practices shall be in accordance with the United Nations Convention on the Rights of the Child and the statutory requirements that apply in the country concerned, including the exploitation of child labor.

Children have to be protected with regard to their development and the maintenance of their health, and their safety and decency must be ensured. The same applies to all people and groups of people who are not granted the same rights as others and who are particularly vulnerable.

### 2. Ban on forced and compulsory labor

LANCOM strictly opposes any form of forced labor, compulsory labor or slavery. This includes the flat refusal of direct or indirect fees, recruitment costs, deposits or similar payments requested from workers as a precondition for their work.

Employment relationships shall always be entered into voluntarily and can be terminated in line with the agreed periods of notice.



### 3. Occupational safety and health

LANCOM requires the implementation of all statutory and official provisions relating to occupational safety to protect employees' physical and mental integrity. Besides the minimization of risks of occupational accidents and illnesses, and the provision of trainings to help avoid these risks, constant efforts to make meaningful improvements are also required.

Entrepreneurial activity must be designed so as to ensure that the health of those individuals carrying out the work and that of local residents is not compromised.

### 4. Right to organize, freedom of association and collective bargaining rights

LANCOM recognizes the right of all employees to join employee representative bodies and trade unions, to engage in collective bargaining and to strike, in accordance with applicable law. The exercise of any of these rights must not result in unjustified treatment or reprisals.

Dialog on working conditions in accordance with applicable law and the right to publicly advocate for them is an important part of a dignified work culture.

### 5. Respectful and dignified collaboration

For LANCOM, all forms of physical or psychological harassment and violence are prohibited. As all human beings are equal, we tolerate no excuses for discrimination<sup>1</sup>, i.e. unjustified unequal treatment. People's different characteristics are not only to be recognized, but are also to be promoted, creating a working atmosphere that is characterized by open-minded, respectful interaction and appreciation of personal diversity.

### 6. Pay and working hours

For LANCOM, setting appropriate wages means that applicable legislation and regulations with regard to pay must be adhered to as a mandatory requirement. The same applies to compliance with provisions on working hours, which must be defined by set breaks and regulations governing time off.

Pay must allow for a dignified standard of living. This also includes working hours regulations that ensure an appropriate balance between working hours and leisure time.

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<sup>1</sup> Unequal treatment based on age, disability, beliefs, origin, gender, political affiliation or trade union activity, ethnicity, religion or sexual identity.



## 7. Eviction

LANCOM opposes both unlawful eviction and the unlawful expropriation of land, forests and bodies of water in the case of acquisition, construction or other use, where such use forms the basis for a person's livelihood.

Life-sustaining ecological conditions must be preserved as such.

## 8. Use of private or public security forces

LANCOM opposes any sort of action that contravenes human rights taken by private or public security forces deployed to protect corporate property or projects.

Any security forces commissioned are obliged to comply with the principles of this code of conduct for R&S suppliers.

## 9. Avoidance of environmental hazards, environmental protection and product safety

Products, processes and procedures are developed and deployed in an environmentally compatible manner in accordance with the technical state of the art.

LANCOM requires compliance with all relevant legislation and regulations designed to protect people and the environment in the context of its working environment and the performance of its duties.

Where relevant, LANCOM expects compliance with regulations governing water quality and economical water consumption, as well as air quality, the avoidance of noise that is hazardous to health, and responsible management of natural resources, the handling of chemicals and the handling of waste. Harmful changes to the soil and air, to bodies of water or resulting from water consumption are to be avoided.

All applicable legislation and regulations regarding hazardous substances, chemicals and materials must be strictly adhered to.

In particular, this applies to all applicable legislation and regulations resulting

- from the Minamata Convention on Mercury,
- from the Stockholm Convention on Persistent Organic Pollutants and
- from the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal.

All persons who are directly or indirectly affected by the environmental impact of entrepreneurial activities, the handling of substances or product safety are assured that their living conditions will be protected.