



McSHARK  
Business

# Supplier Code of Conduct

November 2023

## Foreword

HAAI GmbH is committed to social, ethical and ecological responsibility and to compliance with the standards in these areas. Internal monitoring and reporting systems ensure that our employees internalize these values. We also expect our suppliers to adhere to these principles. Integrity and sustainable corporate governance are important components of successful cooperation. Our suppliers are therefore also encouraged to pass these guidelines on to their subcontractors and suppliers. Furthermore, we reserve the right to monitor our suppliers' compliance with the standards in audits or to demand proof of compliance. A breach of these guidelines entitles us to terminate the business agreement for good cause.

## Principles

### Social

- Prohibition of forced labor
- Prohibition of child labor
- Fair remuneration
- Fair working hours
- Freedom of association
- Prohibition of discrimination
- Health and safety in the workplace
- Conflict minerals

### Ethical

- Fair competition
- Fight against corruption
- Fight against money laundering and tax evasion
- Data protection and confidentiality
- Compliance with other laws

### Ecological

- Careful use of natural resources
- Handling of waste
- Reduction of emissions

McSHARK  
Education

**A1** Exclusive  
Partner

 Premium  
Reseller

**SAMSUNG**  
Authorized Reseller  
Mobile Platinum

 Authorised  
Service Provider

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## **McSHARK Business**

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## **McSHARK Education**

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## **UniCredit Bank Austria AG**

IBAN: AT93 1200 0529 5600 1086 · SWIFT/BIC: BKAUATWW

## **Raiffeisenbank NÖ-Wien**

IBAN: AT87 3200 0000 0032 2206 · BIC: RLNWATWW

Steuernummer: 09 364/1264

ATU63386909

Handelsgericht Wien

FN 292863g

### **Compliance/Whistleblower system**

Appropriate monitoring and reporting systems must be set up to ensure compliance with these guidelines. If you discover a violation at our company or at one of our suppliers, please report it to the following office:

Via email: [compliance@anantara.at](mailto:compliance@anantara.at)

Via mail:

ANANTARA Holding GmbH  
COMPLIANCE  
Siccardsburggasse 36  
1100 Vienna  
AUSTRIA

**Your report will be treated confidentially!**

### **The principles in detail**

#### **Prohibition of forced labor**

Any form of forced labor, modern slavery or human trafficking is prohibited. Employees have the right of terminating their employment relationship. Reference is made to compliance with the ILO conventions.

#### **Prohibition of child labor**

It is strictly forbidden to use child labor in the supply chain. In accordance with the conventions of the ILO and the UN, care must be taken to ensure that the minimum age complies with local legal requirements and that special protection regulations for young people are also observed.

#### **Fair remuneration**

Remuneration must correspond to the national statutory minimum standards or the minimum standards customary in the industry (the higher amount is decisive) and be sufficient to cover living expenses. The composition of the remuneration must be clear and comprehensible. Salary deductions as disciplinary measures are not permitted.

#### **Fair working hours**

Working hours must comply with national legal standards. Overtime is only permitted under certain circumstances. Rest periods and other protective provisions must be observed.

#### **Freedom of association**

The rights of employees associate freely or elect joint representation in accordance with the possibilities guaranteed by law must be respected. Employees must not suffer any discrimination as a result and the associated rights must not be restricted.

### Prohibition of discrimination

Any discrimination based on any ground such as sex, race, color, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited.

### Health and safety in the workplace

Attention must be paid to the health of employees and safety in the workplace. Compliance with legal regulations is the absolute minimum. In addition, precautions must be taken to ensure that activities are as health-friendly and accident-free as possible.

### Conflict minerals

When procuring conflict minerals (in particular tantalum, tungsten, tin and gold), it must be ensured that these are not sourced from conflict areas. Reference is made to regulations such as the Dodd-Frank Act, EU Regulation 2017/821 and the OECD guidelines.

### Fair competition

The rules of fair competition must be respected and complied with. Illegal agreements or other violations of antitrust laws must be avoided.

### Fight against corruption

The highest standards of integrity must be observed in all activities. Internal reporting and control systems must ensure that bribery and corruption are effectively prevented. In addition to compliance with legal provisions, internal guidelines ("Code of Conduct") must also be defined. This applies to both the public and private sectors.

### Fight against money laundering and tax evasion

Suppliers are expected to comply with national tax regulations. Tax evasion must neither be fabricated nor encouraged. Furthermore, active action should be taken against money laundering. Suspected cases must be reported to the competent authorities.

### Data protection and confidentiality

Both personal and confidential data must be handled responsibly. It must be ensured that access is limited to what is necessary and permissible. Technical and organizational measures must ensure that unauthorized processing is prevented.

### Compliance with other laws

The national legal provisions and regulations of international agreements must also be observed in all other areas not explicitly mentioned here.

### Careful use of natural resources

Our natural resources are limited, which is why it is very important to us to use them sparingly. This applies to both the manufacture of products and all other processes within the company. Materials are to be recycled wherever possible and energy consumption is to be minimized to achieve optimum efficiency.

### Handling of waste

Where recycling is not possible, proper disposal of waste and sewage must be ensured. Special attention is paid to hazardous substances. Compliance with legal regulations and international agreements is the absolute minimum.

### Reduction of emissions

Care must be taken to ensure that emissions to the immediate surroundings comply with legal requirements and that the impact on the environment is kept to a minimum. Furthermore, the emission of greenhouse gases should be reduced as much as possible or, if possible, avoided altogether.

### Confirmation of compliance

The supplier hereby undertakes to comply with the above standards and confirms that it will inform its employees and sub-suppliers accordingly.

Name:

Position:

Date:

Signature: