



SUPPLIER CODE OF CONDUCT

eMAG is committed to conducting its business in an ethical, legal, and socially responsible manner, as well as to protecting the environment.

eMAG is committed to comply with the guiding principles of the United Nations (UN) on business and human rights, as well as the International Labour Organization (ILO) Declaration on fundamental principles and rights at work. Furthermore, eMAG group is a participant in the UN Global Compact, a voluntary initiative of the United Nations that commits to sustainable development and the implementation of global sustainability principles.

We are conscious and responsible in our relationship with our supply chain partners and our procurement decisions. Therefore, we expect a commitment from our suppliers based on principles that are in line with our own commitments regarding compliance with legislation, national standards of corporate governance, social and environmental standards, respect for human rights, protection of confidential information, and ethical conduct in business.

All our employees and suppliers, as well as their subcontractors, must fully comply with this Code of Conduct. In the event of differences or conflicts, the most relevant standard shall apply.

We believe that only through collaboration we can have a beneficial impact on the markets and communities in which we operate, and contribute to reducing the negative impact on the environment. Therefore, we issue this Code of Conduct ("**the Code**") which establishes the standards of eMAG group in relation with its suppliers.

1. Purpose

The Code is addressed to and applicable to all suppliers of eMAG group, as well as subcontractors, collaborators, or business partners thereof, involved in activities carried out for eMAG group and/or any of its affiliates.

Scope of application:

- all activities deriving from commercial relationships regarding the procurement of products and/or services by eMAG group, the development of projects or joint partnerships.
- all companies that are part of eMAG group (e.g., eMAG Hungary, eMAG Bulgaria, etc.). *more details about the eMAG group can be found here <https://about.emag.ro/grup-emag/>, collectively referred to in this Code as "the eMAG group" or "eMAG".

The Code applies to all employees of eMAG suppliers, including permanent, temporary, or seconded employees, as well as all employees of subcontractors, collaborators, partners, or affiliates thereof. Suppliers are committed to making the provisions of this Code known to them.

We expect our suppliers to support our commitment to fully respect this Code by developing and implementing a similar policy and a due diligence process based on the principles of compliance with the law and business ethics within their own supply chains.



2. Compliance with laws

eMAG expects its suppliers to comply with current legislation and applicable regulations regarding their activities and to hold the necessary authorizations, approvals, or permits for the provision of services or delivery of goods to eMAG group, as appropriate.

Commercial relationships between eMAG and suppliers will be conducted in accordance with competition legislation provisions. Thus, eMAG and its suppliers will not engage in any anti-competitive practices. Among other things, suppliers will not engage in, or propose, agreements or other anti-competitive practices, such as those concerning customers, territories, prices. Also, no sensitive data from the perspective of competition legislation will be disclosed between eMAG and suppliers.

2.1. Business Ethics and Integrity

eMAG will not tolerate suppliers who engage in bribery or corruption activities, for any reason, whether we are talking about relationships with government officials, representatives of public authorities, or private sector individuals.

Our suppliers commit to:

- comply with the laws and regulations applicable against bribery and corruption.
- having zero tolerance for bribery, corruption, or fraud.
- preventing immoral or integrity-contrary commercial practices.
- competing fairly and ethically, within the limits of applicable competition laws.
- communicating in a transparent, appropriate, and prudent manner.

Suppliers must ensure that their employees do not offer, promise, grant, or request any benefit of any kind to eMAG employees, to obtain an order or other preferential treatment in the context of business transactions.

Also, we inform you that eMAG has established clear rules regarding the offering and receiving of gifts by its employees. eMAG does not encourage the receipt of gifts of any kind. Hospitality manifestations, including those offered or received according to local practice on the occasion of legal holidays, must be of symbolic value and must not be transmitted with the intention (or give the impression that they are transmitted with the intention) of influencing a business decision. Suppliers are committed to respecting the same rules, especially when representing eMAG in relation to third parties.

2.2. Conflicts of interest

Decisions made in a context of conflict of interest can raise a question mark over their correctness, but also over the integrity of the person who took them.

Suppliers must avoid any kind of conflicts of interest that can influence their impartiality, independence, and objectivity in conducting negotiations or during business relationships with eMAG.

Suppliers commit to immediately inform eMAG of the existence of any conflicts of interest or circumstances, present or future, that may generate a conflict of interest situation, in order to establish reasonable measures necessary to remove it.



2.3. Money Laundering Prevention and Counter-Terrorism Financing

Suppliers must not engage in money laundering activities and must comply with relevant legal obligations aimed at preventing money laundering and combating terrorism. Where legislation requires, suppliers will take the necessary legal measures for customer due diligence and compliance monitoring.

2.4. International Sanctions and Export Controls

Suppliers commit to complying with international sanctions regimes and legal provisions on export controls as established by the United Nations, the European Union, other international organizations, or through unilateral decisions of Romania or other countries, globally.

The supplier guarantees the following:

- it is not directly or indirectly owned by, controlled by, does not own, does not control, or is not named as a restricted entity or party, in accordance with applicable legislation in the field of international sanctions.
- the supplier, its ultimate beneficiary, affiliates, or representatives are not subject to any investigation by government authorities regarding the violation of international sanctions and will notify eMAG if it becomes the subject of such an investigation.
- it will not use any funds received from eMAG for the benefit of any restricted persons or entities or persons or entities from sanctioned countries.
- the goods or the raw materials (individually or related to the goods), transmitted or made available in any form to eMAG, are not subject to an international restriction or sanction. The supplier will immediately notify eMAG of the occurrence of such a situation and will immediately take all necessary measures to ensure compliance with legal and contractual requirements and to prevent any damages.

2.5. Confidentiality. Intellectual Property

Suppliers must treat business correspondence confidentially and not disclose to the public or unauthorized third parties any confidential information regarding eMAG, its customers, partners, or employees, to which they have access during the course of the business relationship.

Confidential information and intellectual property rights of eMAG must be adequately protected, in accordance with the legal provisions and contractual agreements, respectively with applicable confidentiality agreements.

2.6. Information Security. Personal data protection

We attach great importance to information security and personal data protection. The protection of personal data of employees, customers, representatives of suppliers and other business partners is a priority for us and we want this principle to be respected by our suppliers as well.

The suppliers undertake to process the personal data to which they have access exclusively in compliance with the applicable data protection regulations.

3. Human rights and working conditions

Suppliers commit to:

- comply with the legislation on human rights and ensuring that they are not exposed to or complicit in human rights violations.



- not tolerating employment if the relevant legal minimum age requirements are not met and thus preventing child labor (which deprives children of their childhood, potential, and dignity and is harmful to their physical or mental development, including by interfering with their education).
- not accepting any form of forced labor.
- respecting the freedom of employees to establish or join organizations of their own choosing.
- providing legal, fair, and balanced working conditions, including the payment of remuneration in accordance with applicable law.
- including the United Nations criteria on human rights and working conditions in their own procurement procedures.

4. Diversity

Suppliers commit to:

- respecting and promoting an inclusive work environment that encourages contributions from all employees.
- providing a respectful and safe work environment, free from any form of harassment and discrimination (based on race, gender, age, ethnicity, religion, marital status, political orientation, disability, sexual orientation, or other discriminatory criteria, etc.).
- ensuring a fair and non-discriminatory hiring process, based exclusively on criteria of competence, performance, skills, and merit.
- including inclusion and diversity criteria in their own procurement procedures.

5. Health and safety

Suppliers commit to:

- providing a safe and healthy work environment, respecting environmental, health, and safety rules and practices, including current laws.
- including workplace health and safety criteria in their own procurement or operational procedures.
- to comply, in addition to legal obligations, with eMAG's procedures, work standards and instructions when operating in eMAG locations.

6. Environmental protection

Suppliers commit to:

- ensuring compliance with current environmental laws and regulations.
- reducing environmental impact by improving resource efficiency in their own operations (fuel, energy, water, plastic, paper, waste, etc.).
- making efforts to measure energy consumption data and emissions generated in their own operations. Upon request, the supplier will provide this data.
- taking concrete measures to prevent pollution, depending on the specifics of their activity, where the most relevant negative impact, real or potential, intentional or unintentional, is identified.
- implementing waste management practices in accordance with current laws.



- including environmental protection criteria in their own procurement procedures.

7. Quality. Trasability

The quality of products and services intended for eMAG customers is closely linked to and determined by the quality of goods and services purchased by eMAG from its own suppliers.

Suppliers are fully responsible for the quality of products and services delivered to eMAG. They must ensure that all products and services provided comply with legal requirements and applicable standards in the field and commit to taking all necessary measures to implement such standards in their own work processes.

Suppliers must be able to disclose the country of origin of primary materials for all deliveries made. eMAG reserves the right to request suppliers for a complete description of the supply chain, to facilitate risk assessment and to assess compliance in the upstream supply chain, including the disclosure of all known facilities used to produce goods or services for eMAG. Upon eMAG's request, suppliers will provide reports on the presence in any product or material supplied to eMAG of substances that may be restricted by governmental bodies, customers, and/or recyclers.

8. Final provisions. Notifications

We reserve the right to modify, update, and supplement this Code. Its provisions supplement the contractual provisions agreed between the parties.

The latest version of the Code can be accessed on the eMAG group's page <https://about.emag.ro>.

In the spirit of transparency and good collaboration, occasionally, we may request information to confirm compliance with this Code of Conduct. Suppliers will ensure that they will maintain and make available records in this regard.

To report a suspicion of a violation of this Code, suppliers can contact us through the channels provided, according to the Speak-up Procedure published on the eMAG group's website <https://about.emag.ro>, or on the websites of the companies within the eMAG group.