



Code of Conduct for Business Partners of the MPN Group

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Table of Contents

- Introduction..... 2**
- 1. Business Integrity and Compliance 2**
 - 1.1. Compliance.....2*
 - 1.2. Fair Competition2*
 - 1.3. Information Security and Data Protection3*
- 2. Human Rights and Labor Laws..... 3**
 - 2.1. Salaries and Working Hours3*
 - 2.2. Voluntary Employment3*
 - 2.3. Ban on Child Labor3*
 - 2.4. Ban on Discrimination.....4*
- 3. Health and Safety..... 4**
- 4. Environment..... 4**
- 5. Compliance With Requirements 4**
- 6. Reporting Problems..... 4**

Introduction

Sustainable development represents an essential component of sound corporate governance for the MPN Group¹ (hereinafter: MPN). MPN strives to follow the highest ethical standards in all its decision-making and dealings with business partners. The Code of Conduct for Employees of the MPN Group sets out fundamental, globally applicable standards of conduct for company employees. MPN expects the same conduct from its business partners.

MPN recognizes that different legal regulations may apply to competition and different cultural contexts in which MPN's international business partners operate. The Code of Conduct for Business Partners of the MPN Group (MPN Business Partner Code of Conduct) serves as a benchmark to assess the ethical business practices of MPN's business partners. It takes into account MPN's corporate values – commitment and engagement, respect and fairness, integrity and trust, and transparency and honesty – and sets out minimum social and environmental standards.

In cases where the practices of the business partners and the requirements of MPN Business Partner Code of conduct differ, it is the business partners responsibility to improve their business practices to comply with the standards of the MPN Business Partner Code of Conduct.

1. Business Integrity and Compliance

1.1. Compliance

Business partners of the MPN Group must comply with all applicable laws, provisions, and regulations. They must take appropriate measures to ensure compliance with these legal provisions and MPN's internal company policies – insofar as they are familiar with them – and make every effort to comply with them.

1.2. Fair Competition

Business partners who directly or indirectly attempt to solicit undue advantages from or offer undue advantages to MPN will be excluded from being a business partner. In the interest of business integrity, MPN holds compliance with competition and antitrust laws as well as observance of imposed sanctions and embargoes to the same importance as observance with anti-corruption laws and regulations.

¹ The Group includes: MPN Marketplace Networks GmbH, Chrono24 GmbH, Chrono24 Asia Pacific Ltd., Chrono24 Japan G.K., Chrono24 Inc., Chrono24 Direct GmbH, Fratello Watches B.V., Chrono24 UK Ltd.

If a business partner is also a customer of the MPN Group, they must not claim any unfair advantages from this situation and must keep purchasing and sales strictly separate.

1.3. Information Security and Data Protection

MPN places significant importance on the protection of information. "Information" refers to all data and content the Group possesses. This includes information saved digitally, physically (on paper), and transmitted orally. Business partners must protect the confidentiality, availability, and integrity of all information we transmit, in particular sensitive company data and personal data, and ensure this through appropriate technical and organizational measures.

2. Human Rights and Labor Laws

Respect for human rights is an integral part of MPN's corporate culture. MPN follows the United Nations Guiding Principles on Business and Human Rights. In order to counter adverse impacts on human rights, it is necessary to take appropriate measures to prevent and mitigate them. MPN expects the same from its business partners.

2.1. Salaries and Working Hours

Business partners are obliged to comply with statutory and, where applicable, collectively-agreed regulations on maximum working hours. Salaries and social benefits must comply with the respective German national laws and any binding industry standards.

2.2. Voluntary Employment

Business partners must not use forced, prisoner, slave, or compulsory labor of any kind. Business partners are responsible for checking the origin of conflict minerals in the procurement and production of goods and for preventing any use thereof along their supply chain.

2.3. Ban on Child Labor

Business partners must not have any work carried out by children under the minimum age specified by the International Labor Organization or national laws.

2.4. Ban on Discrimination

Business partners must provide a work environment free from psychological abuse, physical abuse, sexual abuse, verbal abuse, intimidation, threats, and harassment. Business partners should commit to the principle of equal opportunity in their personnel decisions. Discrimination on the grounds of someone's nationality, background, ethnic or political affiliation, gender, religion or ideology, disability, age, or sexual orientation is prohibited.

3. Health and Safety

Business partners must provide a safe and healthy work environment to prevent accidents and illness. This includes carrying out regular training sessions and providing suitable protective clothing, among other measures.

4. Environment

Business partners undertake to comply with all applicable environmental laws and to use natural resources responsibly. Business partners whose professional activities have a significant environmental impact should have an effective environmental management system in place that contributes to environmental protection and reduces the negative impact of their products and services on the environment.

5. Compliance with requirements

It is the business partner's responsibility to ensure that their business practices and supply chains comply with these requirements. MPN reserves the right to investigate compliance with the MPN Business Partner Code of Conduct and terminate business relationships in the event of violations. If a business partner knows about or has good reason to suspect that one of their suppliers is acting in violation of this Code of Conduct, they must notify MNP of this fact immediately.

6. Reporting Problems

MPN provides a confidential reporting channel (see below) to all employees of business partners who wish to report possible legal violations (laws, regulations, etc.) or violations of this MPN Business Partner Code of Conduct. The business partner ensures that their employees know of this confidential reporting channel and that reprisals are prohibited.

If a whistleblower contacts MPN, MPN will treat any information received as confidential in compliance with all applicable data privacy laws. In principle, MPN works to ensure that whistleblowers provide as much information as possible about compliance violations. MPN then checks the plausibility of the accusations and the credibility of the whistleblower.

MPN will only inform the business partner of the name of the whistleblower with the latter's express permission. The business partner hereby agrees that MPN grants whistleblowers anonymity where legally possible.

If, following the plausibility check, it is necessary for MPN to initiate a formal investigation, the business partner agrees to such an investigation.

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Anonymous Whistleblowing System: [Chrono24 Whistleblowing](#)