

ALEF Group

Supplier Code of Ethics

1 Preamble

ALEF Group (hereinafter referred to as the “Company”) has been active in the market since 1994. Over the years, the Company has grown into a dynamic and rapidly expanding supplier of information technology solutions and is now one of the leading distributors of several major ICT brands in central and south-eastern Europe and a trusted provider of professional ICT solutions. The Company has built its reputation as an honest, fair, and trustworthy business partner by upholding the highest standards of integrity and ethical conduct. We are committed to maintaining these standards across all areas of our operations and expect the same from those with whom we do business.

We actively support and promote fundamental principles in the areas of human rights, labor practices, environmental responsibility, and ethical business conduct.

These values form the foundation of our relationships with suppliers and are embedded in this Supplier Code of Ethics. The Company seeks to establish and maintain legal and commercial relationships only with suppliers who share and uphold these core values and responsible business practices.

This Supplier Code of Ethics is binding on all companies and entities that supply, or intend to supply, products or services to the Company —either directly or indirectly—through their employees, affiliates, distributors, subcontractors, agents, or other representatives (collectively referred to as “Suppliers”).

All Suppliers are required to familiarize themselves with the contents of this Code and to comply fully with its provisions.

2 Corruption and Bribery

The Supplier shall adhere to the highest standards of integrity and transparency and must comply with all applicable anti-corruption and anti-bribery laws and regulations. Specifically, the Supplier shall:

- Prohibit and actively prevent all forms of bribery, corruption, and money laundering during its business activities.
- Refrain from offering, giving, requesting, or accepting any direct or indirect bribes, facilitation payments, or other improper benefits intended to influence business decisions or gain an unfair advantage.



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- Maintain accurate and complete financial records, ensuring that all transactions are properly documented in accordance with applicable accounting laws, principles, and regulations.
- Conduct business honestly and ethically, establishing open, transparent relationships with business partners and actively promoting a zero-tolerance approach to corruption in any form.
- Immediately report any request or demand for a bribe, gift, or other unauthorized benefit made by the Company's employee, representative, or any individual acting on the Company's behalf to compliance@alef.com.
- If the Supplier provides goods or services related to Cisco, they must adhere to the anti-corruption rules outlined in the [Cisco Global Anti-Corruption Policy for Partners](#)

3 Confidentiality of Information

The Supplier shall treat all sensitive information obtained in the course of its relationship with the Company with the utmost care and in full compliance with applicable laws. Specifically, the Supplier shall:

- Comply with all applicable data protection and information security laws and regulations, particularly in relation to the handling of personal data.
- Acknowledge that the Company may share sensitive or confidential information, including trade secrets and proprietary business data, and strictly observe the obligation of confidentiality in relation to such information.
- Protect all confidential information entrusted by the Company, its affiliates, customers, or other suppliers, ensuring that such information is used or disclosed only with the Company's prior approval and solely for authorized purposes.
- Respect the intellectual property rights of others, including patents, trademarks, copyrights, and other proprietary rights, and refrain from any unauthorized use or infringement.

4 Competition Rules

The Supplier shall conduct its business in full compliance with applicable competition and antitrust laws and support fair, transparent market practices. In particular, the Supplier shall:

- Refrain from engaging in any anti-competitive conduct, including participation in cartels or collusive negotiations with competitors.
- Avoid entering into secret agreements, price-fixing arrangements, discriminatory pricing schemes, or any other practices that may constitute or be perceived as a violation of competition laws or unfair competition.



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- Actively promote fair competition and comply with all applicable national and international competition and antitrust regulations.

5 Supply and Supply Chain

The Supplier is expected to uphold high ethical standards not only within its own operations but also throughout its supply chain. Specifically, the Supplier shall:

- Prohibit and not tolerate any form of corruption or bribery within its supply chain, and conduct business only with partners who comply with all applicable laws and regulations, including those relating to working hours, overtime, wages, and social benefits.
- Implement appropriate measures to ensure that the ethical standards and principles set out in this Supplier Code of Ethics are fully observed by its subcontractors, service providers, and other supply chain partners.

6 Conflict of Interest

A conflict of interest—or the risk or possibility thereof—arises when the personal interests, activities, or objectives of the Supplier, its statutory representatives, supervisory bodies, or any individuals acting on its behalf (including their close associates) interfere with, threaten, or contradict the legitimate interests of the Company.

The Supplier shall:

- Promptly inform the Company of any actual, potential, or perceived conflict of interest.
- Avoid any situations that could negatively affect the interests or impartiality of the Company.
- Take all necessary measures to eliminate or mitigate any identified conflict of interest.

7 Human and Labor Rights

The Supplier is expected to uphold and promote fundamental human and labor rights in all areas of its operations and supply chain. Specifically, the Supplier shall:

- Act in accordance with internationally recognized human rights standards, including the principles of the Universal Declaration of Human Rights.
- Refrain from employing any person below the legal minimum age and comply with all special legal requirements concerning the employment of individuals under the age of 18.
- Respect the right of employees to freely associate and organize in accordance with applicable laws, without intimidation, retaliation, or harassment.
- Ensure equal opportunities in the workplace, regardless of race, skin color, gender, age, sexual orientation, nationality, religion, ethnicity, or other protected characteristics.



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- Comply with all applicable laws and regulations regarding remuneration, social benefits, working hours, overtime, and minimum wage standards.
- Provide a safe and healthy working environment, in accordance with applicable occupational health and safety laws and regulations.
- Prohibit all forms of forced, bonded, or involuntary labor, and avoid knowingly engaging with supply chains involved in human trafficking or modern slavery.
- Treat all employees with dignity and respect, maintaining a workplace free from harassment, abuse, threats, or any form of physical or verbal intimidation.
- Identify, assess, and manage health and safety risks in the workplace, implementing all necessary preventative and protective measures.

8 Environmental Protection

The Supplier is expected to operate in an environmentally responsible manner and actively contribute to the protection of the environment. Specifically, the Supplier shall:

Comply with all applicable environmental laws and regulations relevant to its operations, products, and services.

Minimize its environmental and climate impact, including its carbon footprint, and promote sustainable practices, processes, and environmentally friendly products.

Ensure the responsible management of waste, wastewater, and air emissions, in accordance with applicable environmental standards.

Use natural resources—such as water, raw materials, and energy—efficiently and responsibly.

Apply sustainable packaging practices, minimizing the use of materials and, where possible, using recycled or recyclable packaging.

Understand and manage the environmental impact across the full product life cycle, from design and production through delivery, usage, and end-of-life disposal.

Ensure the safe handling of hazardous substances, including their purchase, labeling, storage, transport, recycling, and disposal, in full compliance with health, safety, and environmental standards.

9 Compliance with the Supplier Code

The Company expects all Suppliers to comply fully with the provisions of this Supplier Code of Ethics and to make continuous efforts to meet the required standards.

The Company reserves the right to request evidence from the Supplier demonstrating compliance with all applicable laws and the principles set out in this Code. To this end, the Company may conduct compliance reviews—either directly or through an appointed independent third party.

Suppliers are therefore required to maintain accurate, current, and sufficiently detailed records to demonstrate compliance with this Code. Throughout the duration of the contractual



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relationship, the Company may request relevant documentation and information, and the Supplier shall be obligated to provide all requested materials in a timely and complete manner.

10 Violation of the Supplier Code of Ethics

Employees, business partners, and third parties are encouraged to report any suspected violations of this Supplier Code of Ethics. Reports may be submitted

- personally - to the Compliance Manager
- by email - to compliance@alef.com

The Company expects that no retaliatory action will be taken by the Suppliers against any individual who, in good faith, reports a concern or violation of this Code.

All reports of non-compliance with this Code will be thoroughly reviewed by the Compliance Manager. In the event of non-compliance, the Supplier will be expected to implement appropriate corrective measures without delay.

In cases of serious breaches or repeated failures to comply, or if the Supplier fails to meet agreed corrective actions within the specified timeframe, the Company reserves the right to terminate the contractual relationship with the Supplier.



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