

Vantage Towers Global Supplier Policy Anti-bribery

Last Update:
08.06.2022

Scope:

This Policy applies to all agreements between Vantage Towers and Supplier.

All references to “Supplier” or “Supplier personnel” in this Supplier Policy shall, where relevant, also include all officers, employees, contractors, subcontractors and agents of Supplier and other persons under its influence or control. Supplier shall procure compliance by such persons.

All references to “Vantage Towers” include the relevant Vantage Towers contracting entity and other Vantage Towers group companies that benefit from the goods and services being provided.

This Vantage Towers Supplier Policy sets out Supplier’s obligations in relation to Anti-bribery.

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1. Introduction

Vantage Towers strives for long-term business relationships with integrity. It is crucial that our Suppliers share the same values and principles we do, because only then we can be truly and sustainably successful.

This policy sets out the minimum requirements our Suppliers must achieve in relation to preventing corruption for the purpose of establishing a business relationship with us that is guided by integrity and trust.

Corruption prevention is a key requirement for integrity and key component of our Vantage Towers compliance management system.

2. What is compliance and why does it matter?

For Vantage Towers, compliance is more than just compliance with the law. Our Compliance is based on our core values of respect, accountability, teamwork and honesty, which are at the center of our Code of Conduct. Not following the rules laid out therein can have serious consequences for individuals, but also for our entire

organization in general. This policy is part of all our procurement agreements and sets out your commitment to adhere to our values and rules accordingly.

3. Corruption Prevention

Vantage Towers does not tolerate any form of corruption. Our approach is zero tolerance as to any bribery or its attempt, including giving and receiving gifts or hospitality that is excessive or improper. We take any indication of possible misconduct seriously and pursue it.

Our Suppliers must comply with all applicable German anti-corruption laws, the UK Bribery Act 2010 (UKBA) and the Foreign Corrupt Practices Act (FCPA) as well as any other relevant local laws applicable.

3.1. Working "on behalf of" Vantage Towers

Suppliers who work on behalf of Vantage Towers and meet third parties must bear in mind that they are representing Vantage Towers. Consequently, Supplier must comply with our high business conduct standards and any applicable laws.

3.2. Handling Gifts and Invitations

We ask all Suppliers to avoid exerting any kind of influence on business decisions by accepting or issuing gifts and invitations. Awarding personal benefits to employees or agents of a business for the purpose of influencing the decisionmaker may be a criminal act for both actors of that transaction.

Therefore, we require all Suppliers to comply with the following basic rules:

- Exchanging benefits during ongoing contract negotiations or tenders is prohibited.
- Invitations to business lunch in the usual canteen or another appropriate setting is allowed as well as any low-value gifts such as for example branded scattered articles.
- Inviting Vantage Towers employees to professional events is also possible, if in line with our rules: The technical aspects of the event must clearly be the main driver for the invitation, whereby accommodation and travel costs of Vantage Towers employees must be paid by Vantage Towers.
- Invitations to sports or music events are not allowed, unless approved by Vantage Towers Compliance in advance of the event for each case. In any case, private accompaniment requires a separate vote in advance.

3.3. Caution when dealing with public officials

Any Supplier dealing with public officials on behalf of Vantage Towers, must act with particular caution and ensure compliance with any applicable rules. Any violation can have serious criminal consequences for both actors.

Therefore, we expect our Suppliers to familiarize themselves with the rules applicable to dealing with public officials and to always comply with them. A public official under the law can be:

- a civil servant;
- an employee of a company that appears to be an 'extended arm of the state' (partly state-owned, providing public service tasks), e. g. public transport companies, energy supply companies;
- an equal welfare organisation (e. g. AWO, Arbeiter-Samariter-Bund, Caritas, Malteser);
- politicians, parliamentarians, members of state governments and employees of international public institutions (e. g. employees of any European institutions, the United Nations/UN) who hold a legislative, judicial, or administrative position of any kind, even on a non-permanent basis.

4. Treatment of Violations

Supplier shall report any instances of illegal or unethical behaviour or breaches of this Code in relation to the goods and services being provided to Vantage Towers via the Vantage Towers Speak Up Tool. Supplier may also report any suspected breaches accordingly. Supplier shall regularly update these Vantage Towers contact

details in their systems and documents, (as this may be updated by Vantage Towers from time to time) and make them accessible to any contractors or subcontractors working on Supplier's behalf for Vantage Towers.

All information provided via the Vantage Towers Speak Up Tool is treated strictly confidentially – and anonymously, if desired. The tool is accessible at: <https://vantagetowers.integrityline.com/frontpage>.
