



Optimum Telecom Algeria SPA (indicated below as OTA) Code of Conduct for its business partners

This OTA Code of Conduct for its business partners (Code) establishes basic requirements and responsibilities for each OTA Business partner. OTA reserves the right to reasonably modify this Code if required.

Our Business partners

OTA is committed to building a best-in-class supply chain and requires **ethical Business partners** to reduce risk to our business by following all applicable laws, observing the highest ethical standards and meeting or exceeding the requirements established in this Code.

Applicability

This Code applies to Business partners and their subsidiaries, subcontractors, and agents who act as licensed/authorized re-sellers of their products and services to OTA. It's required for our Business partners to require their third-party partners to acknowledge the principles of this Code, as well.

General Principles

We know that working in a sustainably way, respecting human rights, and operating with the highest standards of ethical conduct and professional integrity improve long-term business performance. We are committed to respect these principles and ask our Business partners to share our commitment and comply with this Code. This Code has been developed considering best practices in the information and communications technologies sector, the Electronic Industry Citizen Coalition Code of Conduct, the Joint Audit Cooperation Supply Chain Sustainability Guidelines, International Labour Organization conventions, and legal and regulatory requirements.

Compliance with Laws

OTA complies with applicable laws and requires its Business partners to do the same. Neither we nor our Business partners will undertake any activity or accept any risk that would result in unethical outcomes or a violation of applicable laws.

Where the applicable laws and this Code address the same subject and are not in conflict, the highest standard will apply. If any Code requirement conflict with applicable laws, the highest standard consistent with applicable local laws will apply.

Bribery and Corruption

OTA will not tolerate any form of corruption and strictly prohibits illegal payments, fraud, theft, extortion, and embezzlement of any kind. Each OTA Business partner must comply with all applicable anti-bribery laws and maintain accurate books and records that correctly reflect their transactions and contain no false or misleading information. Neither money nor anything of value may be given, offered, requested, promised, or accepted by any Commercial Partner, directly or indirectly through another party, to gain an improper advantage to or related to OTA.

Business partners are expected to maintain their own anti-bribery compliance program to prevent and deter wrongdoing or possible violations of law within their own businesses.

Gifts and Hospitality

Business partners shall not, directly or indirectly, offer gifts, hospitality, or other benefits to OTA employees or representatives with the intent to improperly influence them and will not offer to OTA employees any gifts or hospitality, regardless of amount, during contract negotiation, bidding, tender, or award.



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Ethical Conduct

Ethical conduct requires that we do what is right, not just follow the law. OTA operates on ethical principles and expects its Business partners to operate likewise—with us and in any way related to our business. Simply stated: integrity and honesty matter.

The specific requirements set out in the Code are the minimum standards for our Business partners. We encourage our Business partners to go beyond these standards, particularly where local laws and regulations are either weak or seldom enforced.

A Business partner that fails to adhere to the standards of this Code may not be viewed favorably when awarding further work and may be excluded from some or all business relations.

Due Diligence Process

OTA conducts appropriate, risk-based due diligence analysis when selecting Business partners. Business partners must cooperate with OTA's due diligence process before being hired. Business partners must accurately complete all questionnaires provide requested documentation and transparently disclose information related to ownership and affiliated parties.

Confidentiality and Data Security

Business partners shall:

- keep confidential any information relating to OTA customers, business activities, contracts, projects, financial situation, or performance unless specific written permission is obtained from OTA;
- protect the reasonable privacy expectations of persons with whom they do business;
- comply with privacy and information security laws and regulatory requirements when personal information is collected, processed, and transmitted;
- ensure customer data is kept secure and customer privacy is not breached;
- maintain appropriate security and data security systems; and
- monitor appropriately their employees who interact OTA's data and customer data.

Anti-competitive Behavior

Business partners will not infringe or conspire to be part of any violation of competition laws or anti-trust regulations. Business partners will uphold fair business, advertising, and competition standards.

Conflicts of Interest

A "conflict of interest" occurs when a personal interest of a Commercial Partner (or someone closely related to a Commercial Partner) conflicts with an interest of OTA. Conflicts of interest can be actual (the conflict exists), potential (a situation exists or is foreseeable in which a Conflict of Interest might arise). Business partners should avoid conflicts of interest that could affect business relationships with OTA. When a conflict of interest cannot be avoided, the Business partner must report it to the OTA employee sponsor or the Ethics & Compliance Office of OTA.

Intellectual property

Business partners will respect OTA's intellectual property rights and will transfer technology in a manner that protects intellectual property rights.

Money laundering

Business partners will firmly oppose all forms of money laundering and take steps to prevent financial transactions from being used to launder money.



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Prohibition on Oral Contracts

OTA prohibits oral contracts with Business partners. Prior to commencing work, OTA and its Business partners must agree in writing to terms and conditions of each transaction or engagement.

International Trade and Economic Sanctions

Business partners shall comply with applicable international trade laws and regulations. Business partners will not have trade activities with parties or in jurisdictions where applicable laws or regulations prohibit it.

Human and Labour Rights

Business partners will respect and promote universal human rights as stated in the United Nations' Universal Declaration of Human Rights. Business partners must:

- Treat people with dignity and respect, without mental or physical cruelty or any form of harassment or intimidation;
- not use any form of forced labour, debt bondage, or involuntary or compulsory labour;
- not require employees to surrender any government-issued identification, passports, or work permits as a condition of employment;
- ensure the work relationship between the worker and Business partners is freely chosen and without threats, intimidation or coercion;
- not use child labour;¹
- promote open and honest engagement between employees and management without fear of retaliation or reprisal and recognize, as far as legally possible, the right of free association of employees
- refrain from acquiring any products or services that-- within the supply chain-- involve human trafficking or slavery or human rights violations.

Non-discrimination

In hiring or employment practices, Business partners will not negatively discriminate against any legally protected class, for instance, on the basis of age, race, color, ethnicity, nationality, gender, gender identity or expression, disability, pregnancy, medical condition, religion, social origin or status, political affiliation, trade or union membership.

Employment Conditions

Business partners shall clearly and fairly define the terms and conditions of staff employment and provide fair remuneration at the applicable national statutory minimum wage and comply with the maximum number of working hours, following applicable laws.

Health and safety

Business partners will provide on its premises a healthy and safe working environment following international best practices and applicable law and regulation, including sanitation and hygiene facilities for workers. All work-related fatalities and incidents resulting in near fatal injury that occur on OTA premises or in relation to activities being carried out specifically for OTA must be reported.

Accident and Emergency Readiness

Business partners will prepare for and respond to accidents, health problems, and foreseeable emergencies. Business partners will also record, investigate, and learn from past accidents and emergencies.



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Environment and Pollution Prevention

Business partners will act in accordance with applicable standards regarding environmental protection and will adhere to applicable environmental laws to ensure responsible practices. In countries where legislation is less developed or unenforced, Business partners will strive to minimize environmental impact. Innovative developments in products and services that offer environmental and social benefits and the use of environmentally friendly technologies should be supported. Business partners will work to remedy any activity that adversely affects human life, wildlife, and the environment.

Program for Compliance with this Code

Business partners shall comply with all topics of this Code. If a formal compliance program does not exist, the commercial partner should develop a program or system and strive for continuous improvement.

Reporting

Business partners are required to promptly report any suspected or known violations of this Code. If you have questions about this Code or believe that someone may have violated it, please contact OTA Compliance at compliance@djezzy.dz