



---

# DHH Group

Code of Conduct and Ethics

March 28, 2022

---

*cloud infrastructure  
for the emerging digital economies*

# Index

Introduction.....	2
Company’s Values.....	2
Rules of Conduct.....	2
I Social.....	2
1. Labor and Human Rights.....	2
<i>Anti-Discrimination</i> .....	2
<i>Anti-Harassment and Abuse</i> .....	2
<i>Prevention of Involuntary Labor and Human Trafficking</i> .....	3
<i>Wages and Benefits</i> .....	3
<i>Grievance System</i> .....	3
<i>Community Engagement</i> .....	3
2. Health and Safety.....	4
<i>Emergency Preparedness and Response</i> .....	4
<i>Working Conditions</i> .....	4
<i>Health and Safety Communication</i> .....	4
II Environmental.....	5
<i>Solid Waste Management</i> .....	5
<i>Greenhouse Gas (GHG) Emissions Management</i> .....	5
<i>Resource Consumption Management</i> .....	5
III Governance.....	5
<i>Business Integrity</i> .....	5
<i>Protection and Proper Use of Company Assets</i> .....	5
<i>Protection of Intellectual Property</i> .....	6
<i>Conflict of Interest</i> .....	6
<i>Insider Trading</i> .....	6
<i>Confidentiality and Disclosure of Information</i> .....	6

## Introduction

The Code of Conduct and Ethics (from here on also referred to as “Code”) as outlined below applies to all managers, officers, employees, and collaborators (from here on also referred to as “Parties”) of each of DHH S.p.A. (from here on also referred to as “DHH” or “Company”) portfolio companies and represents in its entirety the guiding values, principles, and commitments of DHH. The Company commits to communicating the Code to all employees and enforcing ethical conduct in its business operations.

## Company’s Values

The Company aims to support the advancement in digitalization of the emerging economies of Europe and beyond by supporting local businesses and professional users with their cloud computing needs. The Company assists clients in achieving professional success via high-quality solutions, technology, and services. Some of the Company’s values are integrity, accountability, care for the community, and safety. Every position at DHH is affected by compliance and ethics, thus all Parties have an active role in fostering an ethical workplace. The Parties demonstrate dedication to DHH by being familiar with the Code, policies, and any applicable laws or regulations. In such a manner, the Company ensures that it conducts business ethically and legally.

## Rules of Conduct

DHH’s guiding principles of ethics and conduct are divided into three categories, as represented below.

### I SOCIAL

#### 1. Labor and Human Rights

##### *Anti-Discrimination*

According to article 21 of the Charter of Fundamental Rights discrimination based on any ground (gender, race, religion, origin, etc.) is prohibited. DHH guarantees this right to all Parties by setting in place policies such as flexible work programs for young mothers, assured parental leave for either parent, flexible religious holidays, and recruitment initiatives to create a more diverse pool. In addition, there is no difference in compensation based on gender. All employees are equally compensated based on their experience and professional efforts. DHH aims to maintain a 50-50 ratio of female-male employees to support the equal representation of women in IT.

##### *Anti-Harassment and Abuse*

Discrimination is exhibited through harassment or abuse of authority and can be an isolated event or a series of events that impact an individual or a group. DHH strives to create a

professional atmosphere where Parties are treated respectfully and with dignity. Therefore, all staff members are educated on inappropriate behavior and are expected to comply in accordance with the policies. Harassment of any kind is forbidden. Harassment is defined as offensive behavior, statement, display, action, violence, or gesture directed towards another Party based on their sex, color, race, religion, national origin, age, disability, sexual orientation, gender identity, or any other feature.

### *Prevention of Involuntary Labor and Human Trafficking*

International Labour Organization (ILO) Convention (No. 29 of 1930) defines forced labor in Article 2(1) as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”.

The Company’s primary focus is protecting labor and human rights. DHH is dedicated to treating every individual who works for or with the Company with respect and dignity. Within the DHH supplier base, the Company expressly bans human trafficking and the use of forced labor, involuntary or exploitative prison work, or other kinds of modern slavery.

### *Wages and Benefits*

Wages and benefits are clearly communicated to the Parties at the beginning of the professional rapport with the Company. The wages and benefits are created respecting the local laws as well as taking into consideration the working experience and skills of the candidate. These are reviewed and updated regularly.

### *Grievance System*

DHH recognizes the importance and puts in place formal procedures to handle employee complaints (grievances). The grievances can range from disputes about organizational policies, employee treatment, and disputes with legal implications. As the first step, employees are requested to file a written complaint with the CEO of their company or the CEO of DHH SpA. Following steps could include presenting the grievance to management or peers.

### *Community Engagement*

Throughout the year, DHH focuses on community engagement programs. In the process, the Company clarifies the engagement’s scope, ensuring that all participants are aware of DHH’s goals and the way results will be used. DHH strives for a successful community involvement process by providing participants with appropriate background knowledge in simple language so that they can take an active part in the program. DHH chooses the best engagement strategies for each stakeholder group ensuring shared purpose and delivery in a format that meets participants’ requirements.

## 2. Health and Safety

### *Emergency Preparedness and Response*

In order to prepare for emergencies, DHH regularly conducts a risk assessment of facilities to identify vulnerable points and plan to reduce or eliminate threats. The employees in relevant positions are requested to develop and revise emergency operating procedures, regularly rehearse possible scenarios (eg. generator not starting, a chiller not functioning), and evaluate the group response. All possible incidents must be reported immediately.

### *Working Conditions*

Ensuring decent working conditions includes defining decent working hours, physical and mental working conditions, personal data protection, and remunerations.

DHH commits to keeping the working hours compliant with all local laws. Overtime shall not be regular, excessive, or compulsory, and it will always be fairly compensated. National and religious holidays shall be paid to all Parties, and additional time off will be provided to employees for outstanding events (wedding, childbirth, death of a family member, etc.). DHH will provide paid annual holidays to all Parties.

DHH works on protecting the health and safety of all employees by complying with national Occupational Health & Safety (OH&S) laws, involving employees in revising the OH&S Management system to improve performance, and promoting well-being at the workplace through flexible work hours and work-from-home policy.

Workers are regularly compensated and remuneration policies are continuously revisited.

The Company is committed to responsibly collecting, processing, and storing employees' data and respecting the local laws. Only the necessary data will be collected and processed. DHH recognizes the right to Parties to be informed, access, correct, and erase applicable data.

### *Health and Safety Communication*

DHH strives to provide Parties with useful, relevant, and accurate information presented in a clear and intelligible manner. This is done to raise understanding of health and safety management, as well as specific risk situations.

## II ENVIRONMENTAL

### *Solid Waste Management*

The Company acknowledges that solid waste management decisions have both short- and long-term economic, environmental, and social implications. DHH is guided by the waste management hierarchy concept. Therefore, waste generation is avoided whenever possible. When possible, the old equipment is reused or given away for humanitarian purposes, and the remaining waste is properly discarded. DHH prefers to buy refurbished equipment to extend the lifetime of particular components and avoid the demand for new equipment. When choosing suppliers, the companies that can prove environmentally sound manufacturing practices are preferred.

### *Greenhouse Gas (GHG) Emissions Management*

DHH identifies environmental aspects to track and implement improvement programs regarding the emissions from the operations. GHG emissions management includes energy conservation and efficiency measures. Data centers are ISO 14001 certified and designed to be energy efficient. The electricity used to power them originates from certified renewable sources. Partner data centers are held up to the same standards. In addition, inactive accounts are deleted to save memory space and energy consumption.

### *Resource Consumption Management*

DHH is mindful of resource consumption. The Parties are obliged to use the Company resources consciously and constantly attempt to lower its usage as in line with the [DHH ESG policy](#). In order to decrease resource consumption, the Company enforces digital administration whenever possible, recycling of office material and waste, and attentive heating management in all offices. DHH portfolio companies support initiatives that encourage recycling. In addition, meetings are held online and business travel is kept to a minimum.

## III GOVERNANCE

### *Business Integrity*

DHH strives to perform business operations with the highest integrity. The Company provides its workers and business partners with the knowledge, instruction, education, advice, and support they need to follow DHH's corporate integrity standards. First and foremost, business integrity involves adhering to all applicable laws and regulations, as well as the Company's high integrity standards. Compliance with these criteria is a must for DHH's long-term success. Through their actions, every Company employee contributes to DHH's integrity. The rules and conditions that indicate proper corporate behavior must be evaluated on an individual basis, taking into account the relevant aspects of each situation.

### *Protection and Proper Use of Company Assets*

Parties are entrusted with using the Company's resources efficiently and protecting the Company's assets and proprietary information (such as but not limited to databases, trade secrets, financial reports, and trademarks). Carelessness, wasteful behavior, and theft shall not be tolerated. In case of suspicion of fraud, the employee will immediately be called for questioning. The equipment must not be used for other than Company business.

### *Protection of Intellectual Property*

Employees are expected to safeguard the Company's intellectual property. They must also respect third-party intellectual property rights and seek clarification from superiors if they have any issues. Before utilizing any intellectual property, it is necessary to obtain authorization and rigorously adhere to the conditions of use.

To the degree permitted by relevant law, Company complies with all privacy regulations in the countries where it does business. It acquires, processes, uses and retains only the personal data necessary for successful Company operations.

### *Conflict of Interest*

Conflicts of interest are strictly prohibited by Company policy. When an employee's interests intersect with the Company's in any way, this is referred to as "conflict of interest". A conflict situation might arise when a Party acts or has interests that make it difficult for them to perform their tasks objectively and effectively for the Company. Conflicts of interest can also arise if a Party or a member of their family benefits improperly as a consequence of their employment with the Company. Employees are not allowed to work as consultants or members of a competing company's board of directors. Workers are not authorized to enter into direct or indirect business ties with the Company's customers, suppliers, or competitors unless they are acting on behalf of the Company. Employees who become aware of a potential conflict should request further information from their superior.

### *Insider Trading*

Employees with access to sensitive information are prohibited from utilizing or distributing such information for purposes other than conducting the Company's business. All information regarding the Company that isn't public should be kept confidential. Using nonpublic information for personal financial advantage, trading, or advising any individual or entity who could make an investment decision based on this knowledge is illegal.

### *Confidentiality and Disclosure of Information*

Personal data protected by privacy regulations, data that cannot be revealed outside of Company operations, and data whose disclosure might harm the Company may be found in the Company's databases. Furthermore, data, documents, and information related to business conversations, procedures, transactions, and contracts to which the Company is a party must be kept confidential and not shared with other parties.

Employees may process, use or disclose the information only when performing their duties and if not otherwise requested. All employees, regardless of full-time, part-time, or collaborators, present or former, are asked to keep the Company, supplier, and client information confidential if not otherwise requested by the Company, or requested by law, regulations, or management. Releasing such information could harm the reputation and business of the Company and its clients. It is considered a criminal offense to utilize such information for personal advantage. Employees shall sign a confidentiality agreement upon request. The Parties are entailed to keep the information confidential during and after the course of their employment. Privileged information shall be processed as defined by the [internal procedure](#).

Employees must get official authorization from their superior before accessing, exposing, discussing, or using any sensitive information. Employees must ensure no unauthorized person can access private information. If there is a doubt whether information can be shared with a client or another employee, the employee shall consult their immediate supervisor.

**Resource used:**

[Intel Code of Conduct](#)

[Google Code of Conduct](#)

[Apple supplier Code of Conduct](#)

[Berkshire Hathway Code of Conduct](#)

[DHH Corporate documents](#)