

Supplier Code of Conduct



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At Estel, we hold our suppliers to the highest ethical and operational standards, in alignment with European Union regulations. This Supplier Code of Conduct outlines our expectations regarding legal compliance, ethical behavior, and sustainability practices. It applies to all suppliers, contractors, and service providers working with Estel.

1. Compliance with European Union Regulations

Suppliers must comply with all applicable European Union laws and regulations, including but not limited to:

- **Data Protection (GDPR):** Ensuring the secure and lawful handling of personal data as outlined in the General Data Protection Regulation (GDPR).
- **Non-Discrimination:** Adhering to EU directives that prohibit discrimination based on race, gender, age, sexual orientation, disability, or religion in hiring and employment practices.
- **Environmental Standards:** Aligning with EU environmental laws and adopting sustainable practices to minimize environmental impact.

3. Ethical Business Practices

Suppliers are expected to operate with the highest level of integrity and ethical conduct, including:

- **Fair Competition:** Avoiding anti-competitive practices and complying with EU antitrust laws.

- **Anti-Corruption:** Prohibiting bribery, fraud, or any corrupt practices in interactions with Estel or third parties.
- **Transparent Operations:** Maintaining accurate records of business activities and providing these upon request to demonstrate compliance.

4. Labor Standards

Suppliers must uphold the rights and dignity of their employees in compliance with EU labor laws and international standards:

- **No Forced or Child Labor:** Strictly prohibiting forced, bonded, or involuntary labor, and ensuring no use of child labor in operations or supply chains.
- **Fair Wages and Working Hours:** Providing fair compensation that meets or exceeds minimum legal requirements and adhering to limits on working hours.
- **Safe Working Conditions:** Ensuring a safe and healthy working environment for employees, in line with EU occupational health and safety standards.

5. Environmental Responsibility

Suppliers are expected to adopt sustainable practices, including:

- Minimizing waste, emissions, and resource consumption.
- Complying with EU directives on hazardous materials, recycling, and carbon reduction.
- Actively working to reduce their ecological footprint and implementing environmentally friendly processes.

6. Respect for Human Rights

Suppliers must respect the human rights of all individuals, including workers, local communities, and other stakeholders, as defined by the Universal Declaration of Human Rights and EU guidelines.

7. Supply Chain Accountability

Suppliers are responsible for ensuring that their subcontractors and suppliers also comply with this Code of Conduct. Suppliers must actively monitor and address any violations in their own supply chain.

8. Reporting and Whistleblowing

Suppliers are encouraged to report any violations of this Code of Conduct or applicable European laws. Reports will be treated confidentially, and e-s-tel is committed to protecting whistleblowers from retaliation, in line with the EU Whistleblower Protection Directive.

9. Audits and Compliance Monitoring

Estel reserves the right to conduct audits or request documentation to verify compliance with this Code of Conduct. Non-compliance may result in corrective action, termination of the business relationship, or legal proceedings.

10. Conclusion

This Supplier Code of Conduct reflects Estel's commitment to ethical business practices, compliance with European regulations, and sustainable development. We expect our suppliers to share these values and to operate with integrity, accountability, and respect for people and the planet.

Thank you for partnering with Estel and supporting our mission to build a responsible and sustainable business ecosystem.