



Sourcing Policy

Präambel

Sanube has developed a **Responsible Sourcing Policy** which defines the way to source goods and services from the market. Sanube therefore is committed only to do business with suppliers who follow business practices which are aligned with our values.

Sanube is aware of the risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas (CAHRAs) and recognizes that we have the responsibility to respect human rights and not contribute to conflict or other forms of corruption. This is in accordance with U.N. resolutions and Section 1502 of the Dodd Frank Act and for the European Union REGULATION (EU) 2017/821. Sanube will only purchase materials such as tin, tantalum, tungsten, cobalt and gold from sources that are not involved in or contributing to illegal armed groups, human rights violations, or financial wrongdoings as defined in Annex II of the Organization of Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). In addition to the legal standards mentioned in this Code, suppliers will comply with all other applicable laws in the provision of products or services to Sanube. Sanube applies a „Zero Tolerance Policy“ regarding unethical business behaviour, bribery, corruption and forced labour.

The Sanube Code of Business Conduct for Suppliers

Human Rights and Labour Practices

Respect for People is a core Sanube Value. Suppliers must respect the Human Rights of their employees and treat them fairly and with respect, in accordance with applicable laws.

- ☞ No Forced and Compulsory Labour: Suppliers will not use forced or involuntary labour, including indentured labour, bonded labour or slave labour.
- ☞ No Harassment and Abuse of Labour: Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment or any other form of abuse and will comply with all applicable laws on harassment and abuse of employees.
- ☞ No Child Labour: Suppliers shall not employ full time employed workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, shall not employ full time employed workers under the age of 14."
- ☞ No Discrimination: Suppliers must promote equal opportunities, not discriminate in any condition of employment on the basis of race, colour, national origin, sex, religion, age, disability or any other personal characteristic unrelated to job performance, and will comply with all applicable employment discrimination laws
- ☞ Appropriate Work Hours and Wages: Suppliers will comply with applicable laws on work hours and overtime, as well as applicable laws on wages and benefits. Where no sufficient legal protection exists, suppliers must ensure at least 1 uninterrupted day off per week and compensate work at a minimum so that employees can meet their basic needs.

Environment, Health and Safety

Sanube commitment to sustainability includes efficient use of resources in the light of the circular economy as well as the commitment to protect the environment and to provide healthy and safe workplaces. Sanube is committed to Responsible Care, avoids using conflict resources and expects its suppliers to make similar commitments to continuously improve their environmental, health and safety performance.

- ☞ Respect the Environment: Suppliers will comply with applicable environmental laws and shall have systems in place to ensure safe management of waste, air emission and wastewater discharges. Suppliers must seek to continuously minimize environmental impact and make continuous improvements to resource efficiency, for instance by using recycled materials
- ☞ Protect Health and Safety: Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, training, work procedures and personal protective equipment. Suppliers will comply with all health and safety laws that are applicable to the workplace.



Ethics and Legal Requirement

Sanube expects its suppliers to conduct their business ethically and in compliance with the law.

- Ⓢ **Avoid Conflicts of Interest:** Suppliers will avoid any interaction with a Sanube employee that may conflict, or appear to conflict, with the employee's ability to act in the best interests of Sanube.
- Ⓢ **No Bribery:** Sanube does not tolerate corruption in any form. Suppliers shall not influence nor seek to influence Sanube employees by payments of money or any other thing of value, including corporate hospitality and gifts. Sanube requires compliance with all applicable anti-bribery and corruption laws in the conduct of business. Compliance is required of any third party acting for or on our behalf, such as agents, distributors, contractors, consultants, etc. Bribery is corruption. It is the giving to or receiving by any person of anything of value, either directly or indirectly, as an inducement to gain an undue commercial, contractual, regulatory or personal advantage or to influence contrary to the principles of honesty and integrity. Bribery can occur, and is unlawful, in both the private (between commercial companies) and the public sector (bribing a public official).
- Ⓢ **Sanube and its employees are not permitted to accept gifts from current or potential Suppliers.** This includes gifts of nominal value. Although giving gifts is acceptable in some cultures, Sanube requests that Suppliers respect its policy of not accepting gifts.
- Ⓢ **Fair Competition:** Suppliers will be committed to vigorous, lawful, straightforward and ethical competition and must ensure that their business practices fully comply with the competition laws wherever they do business.
- Ⓢ **Accurate Accounting and Business Records:** Suppliers will keep – and provide to Sanube upon request – accurate records of all matters related to the supplier's business with Sanube.
- Ⓢ **Protect Information:** Suppliers will protect Sanube confidential information and act to prevent its misuse, theft, fraud or improper disclosure. Suppliers must take all due care in handling, discussing or transmitting sensitive or confidential information that could affect Sanube, its employees, its customers, the business community or the general public.
- Ⓢ **Sanctioned Parties:** Shipper may not use any supplier of services or equipment which (a) is located in any country subject to United Nations, U.S. or EU economic sanctions (or acting on behalf of persons or entities located in such countries) or (b) appears on lists of restricted or prohibited persons maintained by the United Nations, U.S., EU or the country of manufacture, origin/destination of the cargo. Shipper shall screen all vessels, containers and other equipment and their owners to ensure compliance with this requirement.

We expect that our supplier base is behaviour as ethical, legal, and fair partner of Sanube.



Michael Sallaberger
Purchasing Director

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