

Supplier Code of Conduct

Purpose and Scope

SGT Global Supplier Code of Conduct (“Supplier Code”) sets out SGT’s expectations for suppliers in the areas of business integrity and anticorruption, human rights, labor practices, health and safety, and environmental management.

SGT endorses the UN Guiding Principles on Business and Human Rights and is embedding them throughout its operations. SGT’s Human Rights commitment on the International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights; and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. We support the OECD Guidelines for Multinational Enterprises and resulting commitments to compliance with applicable laws, and to fighting corruption in all its forms.

All suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with or on behalf of SGT (“suppliers”) are expected to follow the Supplier Code and all other relevant policies as a condition of doing business with SGT.

Suppliers are also expected to communicate and apply the Supplier Code and relevant policies throughout their supply chain.

SGT expects its suppliers to conduct business responsibly, with integrity, honesty, and transparency, and to adhere to the UNGPs, the relevant international law standards and in particular the following principles:

1. **Comply with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprise**, as well as with international human rights highest standards, notably the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.
2. **Comply with all applicable laws and regulations** of the countries of operation.
3. **Maintain the confidentiality of all** SGT’s and its partners’ information and protect privacy and personal data.
4. **Encourage a diverse workforce** and provide a workplace free from discrimination, harassment or any other form of abuse.

SGT suppliers shall create a work environment in which workers and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Employment decisions must be based on qualifications, skills, performance, and experience.

5. **Treat workers fairly**, including with respect to wages, working hours and benefits.

SGT suppliers shall comply with all applicable **wage, working hours, and benefits laws and regulatory requirements**, including the highest international standards.

6. **Prohibit all forms of forced or compulsory labor** or any form of debt bondage and modern slavery.

SGT suppliers shall maintain and promote fundamental human rights including freedom of movement of workers or the employer pays principles.

Workers must be free to choose or leave employment and there cannot be coerced to work, suffer physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control, nor abuse of their vulnerability.

Employment contracts must clearly state the terms of employment and must not restrict worker movement through the retention of identity papers, holding of deposits, or other actions aimed to prevent worker termination of their employment. In addition,

7. **Prohibit use of child labor.**

Suppliers shall adhere to the minimum employment age limit defined by national law or regulation and comply with relevant International Labor Organization (ILO) standards. In addition.

8. **Respect workers' rights to freedom of association and collective bargaining.**

Consistent with international standards, SGT suppliers shall respect workers' rights to join associations and worker organizations and shall engage in dialogue with workers representatives.

9. **Provide safe and healthy working conditions.**

SGT suppliers shall proactively manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are

prevented. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industry. In addition, suppliers shall provide access to safe drinking water, sanitation and hygiene, including adequate restrooms and handwashing facilities; fire exits and essential fire safety equipment; emergency aid kits; and access to emergency response services including environmental, fire and medical.

10. Provide adequate accommodation

When accommodation is provided to the workers, it was be adequate, decent safe, hygienic and avoid poor, dense living conditions in worker dormitories.

11. Respect the environment

SGT suppliers shall carry out operations with care for the environment and comply with all applicable environmental laws and regulations.

The potential environmental impacts of daily business decision-making processes should be considered along with opportunities for conservation of natural resources, biodiversity, cultural heritage, source reduction, material recycling, and pollution control to ensure cleaner air and water and reduction of landfill wastes.

12. Set a human rights due diligence process

Support compliance with the Supplier Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by SGT.

To conduct business with SGT, suppliers must enter into contracts and execute purchase orders that mandate compliance with the Supplier Code. With prior notice, SGT may conduct **reasonable audits to verify Supplier's compliance with the Supplier Code or be** required to complete Third Party Due Diligence process from time to time.

13. Ensure that all land acquisitions (including leasing and utilization) meet international law standards, in particular the International Finance Corporation (IFC) Performance Standards, including Free, Prior and Informed Consent and national legislation.

SGT expects that suppliers have an effective Grievance Management system in place for grievances raised by workers within their operations or by third parties, which elevate potential violations to management in line with the UNGPs.