

# SUPPLIER CODE OF CONDUCT

# SINTEC Supplier Code of Conduct

How we expects our suppliers and partners to act

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## 1. Introduction

Our common values are the base for our teamwork, for our behaviour towards our customers, partners and our colleagues and therefore for the common success as a company. All SINTEC employees should follow for principle core values:

We are result-driven.

We think and act proactively.

We are open-minded.

We act responsibly.

We expect that our suppliers and business partners are chosen on base of these Living Values and SINTEC introduces suitable processes within their organizations that support Compliance with applicable laws and regulation.

Suppliers and business partners must abide following basic principles when working with SINTEC:

- Compliance with applicable laws and regulations
- Rejection of corruption
- Fair competition
- Respect for human rights
- Ban on forced and child labour
- Safeguarding of health and safety
- Data protection and security
- Confidentiality and non-disclosure
- Environmental protection and sustainability

This is the core of this Supplier Code of Conduct.

## 2. Prevention of Underage Labour

At SINTEC, we expect our suppliers to prohibit and refrain from any kind of child labour within their organization. Suppliers may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with the local legal requirements.

## 3. Antidiscrimination

At SINTEC, we expect that our suppliers promote equal opportunities and equal treatment. Within the organization of our suppliers, no employee may be discriminated based on his or her age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation or union membership in hiring and other employment practices.

## **4. Anti-Harassment and Abuse**

At SINTEC, we expect that our suppliers commit to a workplace free of harassment and abuse. Suppliers shall not threaten employees with, or subject them to harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion and sexual harassment.

## **5. Prevention of Involuntary Labour and Human Trafficking**

At SINTEC, we expect that our suppliers ensure that all work is voluntary. Supplier shall not traffic persons or use any form of slave, forced, bonded, indentured or prison labour. Involuntary labour includes transportation, harbouring, recruitment, transfer, receipt or employment of persons by means of threat, force, coercion, abduction, fraud or payments to any person having control over another person for the purpose of exploitation. Suppliers shall not withhold employees' original government-issued identification and travel documents. Suppliers shall ensure that employee's contracts clearly convey the conditions of employment in a language understood by the employees.

## **6. Wages, Benefits and Working Hours**

At SINTEC, we expect our suppliers to fully comply with applicable national statute on working time. Furthermore, we expect that the employees of our suppliers receive a remuneration which is in line with applicable national statute. Suppliers shall offer vacation time, leave periods and time off for legally recognized holidays. Suppliers shall compensate employees for overtime hours at the legal premium rate. Wage deductions shall not be used as a disciplinary measure.

## **7. Occupational Health, Safety and Hazard Prevention**

At SINTEC, we expect our suppliers to fully comply with applicable national statute governing health and safety at work. Suppliers shall identify, evaluate and manage occupational health and safety hazards through a prioritized process of hazard elimination, engineering controls and / or administrative controls. Suppliers shall provide employees with job-related, appropriately maintained personal protective equipment and instruction on its proper use.

## **8. Environmental protection**

At SINTEC, we expect our suppliers to comply with all applicable national laws, regulations and standards to protect the environment. Suppliers are expected to establish and maintain a suitable environmental management system (e.g., in accordance with ISO 14001, or national equivalent) to minimize environmental impact and hazards, and to improve environmental protection in their everyday operations.

## **9. Business Integrity**

At SINTEC, we expect our suppliers to have zero-tolerance for corruption and to ensure compliance with all United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions against corruption, and with all governing anti-corruption laws. In particular, our suppliers are expected to ensure that their employees, sub-contractors and agents do not offer, promise or grant any advantages to any SINTEC employee or related parties with the goal of securing an order award or any other form of preferential treatment in their business transactions.

## **10. Protection of Intellectual Property**

At SINTEC, we expect suppliers to respect intellectual property rights and safeguard customer information. Suppliers shall manage technology and know-how in a manner that protects intellectual property rights.

## **11. Whistle-blower Protection and Anonymous Complaints**

At SINTEC, we expect suppliers to provide an anonymous complaint mechanism for managers and employees to report workplace grievances. Supplier shall protect whistle-blower confidentiality and prohibit retaliation.

## **12. Invitations and gifts**

At SINTEC, we expect our suppliers to refrain from presenting any invitations or gifts to our employees so as to gain any form of influence. Any invitation or gift extended to SINTEC employees or related parties, must be reasonable and suitable with a view to scope and design, i.e. they must be of low financial value and reflect ordinary local business custom. We also expect our suppliers to refrain from asking SINTEC employees or related parties for any inappropriate advantages.

## **13. Preventing conflicts of interest**

At SINTEC, we expect our suppliers to take decisions based on objective criteria only. Any factors that might influence our suppliers' decisions due to private, business or other conflicts of interest must be prevented from the start. The same applies to relatives and other related parties.

## **14. Unrestricted competition**

At SINTEC, we expect our suppliers to always compete in a fair manner and to comply with applicable antitrust laws and regulations. Our suppliers are expected not to enter into agreements with competitors that might constitute a breach of antitrust law, nor to take advantage of any dominant market position they might hold.

## 15. Money laundering

At SINTEC, we expect our suppliers to comply with all applicable statute governing the prevention of money laundering, and not to participate in any money laundering activities.

## 16. Supplier relations

At SINTEC, we expect our suppliers to communicate the principles laid out herein to their sub-contractors and sub-suppliers and to take these principles into account when selecting sub-contractors and sub-suppliers. Our suppliers are expected to encourage their sub-contractors and sub-suppliers to comply with the minimum standards of this Code of Conduct regarding the protection of human rights, working conditions, anti-corruption and environmental protection when fulfilling their contractual obligations.

## 17. Compliance with this Code of Conduct

We will review our suppliers' compliance with the principles and requirements laid out in the SINTEC Supplier Code of Conduct regularly. Any violation of the principles and requirements set out in this SINTEC Supplier Code of Conduct will be regarded as a serious violation of the supplier regarding his contractual obligations towards SINTEC. In the event that supplier is suspected of violating any of the principles laid out in this Supplier Code of Conduct (e.g. based on negative media reports), SINTEC reserves the right to request from the supplier that all relevant information be disclosed.

Furthermore, SINTEC reserves the right to stop any business with all suppliers who are in clear, verifiable violation of SINTEC's Supplier Code of Conduct and/or who are neither seeking nor implementing measures for improving their sustainability performance. In the event that a supplier evidently fails to fulfil any of the principles and requirements set out in this SINTEC Supplier Code of Conduct or refuses to implement measures for improving his sustainability performance, SINTEC reserves the right to immediately terminate any or all contracts with the supplier.

**London, 19 April 2016**

Dimitri Romaniuk  
Director

On behalf of: .....  
Signed by: .....  
Date: .....