

# Supplier Code of Conduct

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# Supplier Code of Conduct

## Purpose:

A key priority for Sasken is conducting its business in a responsible and sustainable manner. Sasken has implemented high standards to guarantee compliance and awareness of ethical, social and environmental standards and human rights. Sasken has a companywide applicable Code of Conduct which addresses Sasken principles and values to internal and external stakeholders. The performance of suppliers sets an important part of the value generated by Sasken. This “Suppliers Code of Conduct” shows Sasken’s expectation towards its suppliers in a clear and transparent manner directly addressable to them. Every Sasken supplier shall respect and comply with the standards laid down herein by taking reasonable measures depending on the size and nature of its operation, as far as it is reasonably practicable. The Sasken Supplier Code of Conduct shall be applicable for all suppliers that are (or will be) business partners of Sasken and/or its affiliates belonging to Sasken. Sasken might amend this Supplier Code of Conduct from time to time and expects its suppliers to review and implement the changes made within a reasonable time into its business practices, if the requirements are not already met. Suppliers shall make reasonable efforts to continuously improve the development and the implementation of measures to ensure best business practice related to sustainability and high quality standards. Suppliers are also requested to have a procedure in place how to deal and remedy within reasonable timeframe in case of any violations of the requirements herein.

## Scope:

This policy is applicable to all regular suppliers of Sasken.

## Policy Statements:

Environmental, Social, and Governance (ESG) considerations have become increasingly important in corporate governance and decision-making. The responsibility of suppliers in relation to ESG can have a significant impact on Sasken’s overall sustainability and ethical practices.

Sasken will be looking to engage with suppliers under the ESG (Environmental, Social, and Governance) context, it seeks partnerships with suppliers that align with its values and commitment to sustainability. Here are key characteristics and human rights what Sasken believes and would emphasize the supplier should also practice /demonstrate following practices in their respective organization. **Sasken’s Human right policy is given in detail here below for the vendor to understand what it takes to become a supplier or value partner to Sasken :**

## Compliance with laws, rules and regulations

Suppliers shall fully comply with all laws and regulations applicable to them. Suppliers shall especially ensure their compliance with the provisions set forth in this Code of Conduct as well as contractual obligations agreed between the supplier and the respective company. This includes in particular local laws and regulations and international standards in all aspects. Measured by suppliers size and type of business, Sasken expects its suppliers to implement and maintain an appropriate compliance and quality management system. In particular, suppliers shall aim to prevent or minimize any risks to human rights or environmental- related risks or to end the violation of human rights-related or



environment-related obligations. Suppliers shall therefore ensure the compliance with the requirements as laid down in the applicable regulations in respective states /cities and countries as well as international requirements and regulations. This means, including, but not limited to: › establishing a risk management system and designate responsible persons within the enterprise; › performing regular risk analyses, laying down preventive measures in its own area of business and towards direct suppliers; › taking remedial action and establishing a complaints procedure; › implementing due diligence obligations regarding risks at indirect suppliers, documenting reporting

### **Conventions and recommendations of international organizations**

While dealing with international suppliers of Sasken, Sasken expects supplier to meet the high standards and to recognize and apply these standards, in particular in relation to the:

- International Bill of Human Rights, consisting of: Universal Declaration of Human Rights; International Covenant of 19 December 1966 on Civil and Political Rights, (Federal Law Gazette 1973 II pp. 1533, 1534); and International Covenant of 19 December 1966 on Economic, Social and Cultural
- Rights (Federal Law Gazette 1973 II pp. 1569, 1570);
- › European Convention on Human Rights.
- › ILO (International Labour Organization) Tripartite Declaration of Principles on Multinational Enterprises and Social Policy and ILO Declaration on Fundamental Principles and Rights at Work, and fundamental freedoms, in particular, as follows:
  - › Elimination of child labor, minimum age (especially ILO Convention No. 182 and No. 138),
  - › Abolition of forced labor (especially ILO Convention No. 105, ILO Convention No. 29 and Protocol of 11 June 2014 to Convention No. 29),
  - › Prohibition of discrimination (especially ILO Convention No. 111 and equal remuneration for men and women ILO Convention No. 100),
  - › Freedom of association and the right to collective bargaining (especially ILO Convention No. 87 and No. 98);
  - › Minamata Convention on Mercury of 10 October 2013 (Federal Law Gazette 2017 II p. 610, 611) (Minamata Convention);
  - › Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (Federal Law Gazette 2002
  - II pp. 803, 804) (POPs Convention), last amended by the decision of 6 May 2005 (Federal Law Gazette 2009 II pp. 1060, 1061);
- Sasken Supplier Code of Conduct
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Federal Law Gazette 1994 II pp. 2703, 2704) (Basel Convention), as last amended by the Third Ordinance amending Annexes to the Basel Convention of 22 March 1989 of 6 May 2014 (Federal Law Gazette II pp. 306/307);
  - › OECD Guidelines for Multinational Enterprises
  - › “Agenda 21” on Sustainable Development (concluding document of the founding UN Conference on the Environment and Development)
  - › UN Convention against Corruption
  - › UN Convention on the Rights of the Child UN Conventions on the Elimination on all Forms of Discriminations
  - › OECD Convention against Bribery of Foreign Public Officials.



While dealing with Indian suppliers of Sasken, Sasken expects supplier to meet the high standards and to recognize and apply these standards, in particular in relation to the:

- Companies Act, 2013: This governs the incorporation, responsibilities, directors, and dissolution of companies.
- MSME Registration: For small and medium enterprises, registration under the Micro, Small, and Medium Enterprises Development Act (MSMED Act) can offer various benefits.
- Taxation: Goods and Services Tax (GST): Suppliers must register under GST and comply with filing requirements, invoicing rules, and tax payments.
- Income Tax Act, 1961: Compliance with income tax regulations, including filing returns and maintaining accurate financial records.
- Import and Export Regulations: Foreign Trade Policy (FTP): Suppliers involved in import/export must comply with the regulations under the Directorate General of Foreign Trade (DGFT).
- Customs Act, 1962: Compliance with customs duties, tariffs, and procedures for the import and export of goods.
- Labour Laws: Employees' Provident Fund and Miscellaneous Provisions Act, 1952: Mandates contributions to the provident fund for employees.
- Employees' State Insurance Act, 1948: Requires contributions towards employee state insurance for health and social security benefits.
- Minimum Wages Act, 1948: Ensures that workers are paid the statutory minimum wage.
- Environmental Regulations: Environmental Protection Act, 1986: Regulations related to pollution control and environmental impact assessments.
- Waste Management Rules: Proper disposal and management of hazardous and electronic waste.
- Quality Standards: Bureau of Indian Standards (BIS): Ensures products meet specified quality and safety standards.
- Food Safety and Standards Authority of India (FSSAI): For suppliers of food products, compliance with food safety standards is mandatory.
- Consumer Protection: Consumer Protection Act, 2019: Ensures that suppliers provide goods and services that are safe and do not harm consumers.
- Legal Metrology Act, 2009: Regulates the weights and measures used in trade and commerce to ensure accuracy and fairness.
- Industry-Specific Regulations: Pharmaceuticals: Compliance with the Drugs and Cosmetics Act, 1940.
- Electronics: Compliance with the Electronics and Information Technology Goods (Requirements for Compulsory Registration) Order, 2012.
- Intellectual Property: Trademarks Act, 1999: Protects brand names, logos, and other trademarks.
- Patents Act, 1970: Protects innovations and inventions.
- Copyright Act, 1957: Protects literary, artistic, and other creative works.
- Health and Safety Regulations: Factories Act, 1948: Ensures the health, safety, and welfare of workers in factories.
- Occupational Safety, Health, and Working Conditions Code, 2020: Consolidates various labor laws to improve worker safety and health.
- Anti-Corruption Laws: Prevention of Corruption Act, 1988: Prohibits and penalizes corruption and bribery.
- Compliance and Monitoring: Suppliers should keep abreast of changes in laws and regulations.



- Hiring legal and compliance professionals can help ensure adherence to all applicable laws.

#### **Business conduct of suppliers and fair practice of business operations**

- Fair competition and anti-trust law: Competition and anti-trust laws are the pillars of efforts to preserve a free market and fair and open competition.
- Sasken expects suppliers to treat all business partners in a fair and respectful manner, to behave fairly towards competitors, to support free and undistorted competition and to comply with all applicable laws and regulations in this respect. This means, including but not limited to:
  - no conclusion of anti-competitive agreements e.g. no agreements with competitors related to prices / customers / markets/ territories/ products offered
  - no agreements with competitors in regard of refraining from competition; to restrict dealings with suppliers, to submit bogus offers for bidding
  - no communication with competitors about prices, output, capacities, sales, bids, profits, profit margins, costs, methods of distribution or any other fact or factor that determines or influences the competitive behaviors
  - customers and suppliers shall be treated in fair manners, all decisions made in these areas shall be objective in nature
  - no participation in any form of bid rigging or other mechanism that limit fair competition in tender situations, any form of cartel practices with competitors such as dividing or allocating of markets

#### **Prohibition of corruption, extortion and bribery**

- Suppliers are expected to reject all forms of corruption practices and all forms of behavior, which might violate law and the principles of fair competition. This is applicable to all international suppliers as well as Indian suppliers and given here with in detail, to be adhered to:
- Neither Employees and subcontractors nor any other representatives of the suppliers shall grant, offer or accept bribes, facilitation payments and benefits, inadmissible donations or other not reasonable granted benefits from or to customers, officials or other business partners. Suppliers should have a procedure in place, which helps their Employees to understand when an offering and/or gift are ok and when especially not and should be rejected.
- A number of anti-corruption standards have been promulgated at international level and implemented at national levels. The latter laws and regulations prohibit bribery and corrupting acts in all and any forms. These include the UK's Bribery Act and the USA's Foreign Corrupt Practices Act. They have a worldwide scope of application, and they are and shall be strictly enforced. This means, including but not limited to:
  - establish a compliance system which provides awareness in this regard (e.g. regular training of Employees; provide internal adequate controls to prevent and detect corruption)
  - maintain an appropriate system related to financial and accounting procedures to ensure the maintenance of fair and accurate books, records and accounts, to ensure that they can only be used for legitimate purposes





- **Compliance with Laws:** The Supplier shall comply with all applicable anti-bribery and anti-corruption laws, including but not limited to the Prevention of Corruption Act, 1988, and the Indian Penal Code, 1860.
- **Prohibition of Bribery and Corruption:** The Supplier warrants that neither it nor any of its employees, agents, or subcontractors has offered, given, or agreed to give any gift, payment, or other benefit to any person, whether directly or indirectly, as an inducement or reward for the award or execution of this contract or any other contract with the Sasken.
- **Reporting and Whistleblowing:** The Supplier shall promptly report to Sasken, any request or demand for any undue financial or other advantage of any kind received by the Supplier in connection with the performance of this contract. The Supplier shall also implement a whistleblower mechanism to enable employees and third parties to report any unethical practices.
- **Audit Rights:** Sasken reserves the right to audit the Supplier's records, systems, and processes to ensure compliance with this anti-bribery and anti-corruption clause. The Supplier shall provide reasonable assistance and access to relevant records and personnel.
- **Training and Awareness:** The Supplier shall ensure that all relevant employees and subcontractors receive adequate training on anti-bribery and anti-corruption laws and the Supplier's policies regarding such practices.
- **Due Diligence:** The Supplier shall conduct appropriate due diligence on its own suppliers, agents, and subcontractors to ensure that they also comply with anti-bribery and anti-corruption laws.
- **Termination for Breach:** Sasken reserves the right to terminate this contract immediately upon written notice if the Supplier breaches any of the provisions of this anti-bribery and anti-corruption clause. Such termination shall be without prejudice to any other rights or remedies Sasken may have under this contract or applicable law.
- **Representations and Warranties:** The Supplier represents and warrants that it has not engaged in any corrupt practices in connection with obtaining or performing this contract and that it will continue to comply with all relevant anti-bribery and anti-corruption laws throughout the term of this contract.
- **Monitoring and Reporting Mechanisms:** The Supplier shall implement and maintain effective monitoring and reporting mechanisms to detect and prevent bribery and corruption within its organization.
- **Contractual Remedies:** In the event of any violation of the anti-bribery and anti-corruption provisions, Sasken shall be entitled to seek appropriate contractual remedies, including but not limited to damages, indemnification, and specific performance.

### Combating money laundering

- Suppliers shall ensure by appropriate measures that legal money laundering and terrorism financing provisions are not breached. Sasken has committed itself to conducting business with reputable business partners, with "reputable" being defined as those parties that are engaged in lawful business activities, whose funds stem solely from legal sources, and whose operations adhere to the stipulations of antimony laundering and anti-terrorism laws. Suppliers of Sasken are expected to work solely with business partners who are reliable and



for which, appropriate, risk-based measures to verify the identity and economy background are taken, to secure that the origin of payment comes from a legitimate source.

Incase the of Suppliers are from within India following Rules Applies:

- The Supplier shall comply with all applicable anti-money laundering laws, including but not limited to the Prevention of Money Laundering Act, 2002 (PMLA), and the rules and regulations issued thereunder.
- The Supplier warrants that neither it nor any of its employees, agents, or subcontractors shall engage in any activities that could constitute or be perceived as money laundering under applicable laws.
- The Supplier shall conduct thorough due diligence on its customers, clients, and business partners, in accordance with the 'Know Your Customer' (KYC) norms and guidelines prescribed by relevant authorities. This includes verifying the identity and credentials of all parties involved.
- The Supplier shall promptly report to the Sasken any suspicious activities or transactions that may be indicative of money laundering. Such reports shall be made in compliance with the requirements of the Prevention of Money Laundering Act, 2002, and any other applicable laws.
- The Supplier shall maintain accurate and complete records of all transactions, customer information, and due diligence documentation for a minimum period of five years, or as required by law. These records shall be made available to Sasken upon request.
- Sasken reserves the right to audit the Supplier's records, systems, and processes to ensure compliance with this anti-money laundering clause.
- The Supplier shall provide reasonable assistance and access to relevant records and personnel.
- The Supplier shall ensure that all relevant employees and subcontractors receive adequate training on anti-money laundering laws and the Supplier's policies regarding such practices.
- The Sasken reserves the right to terminate this contract immediately upon written notice if the Supplier breaches any of the provisions of this anti-money laundering clause. Such termination shall be without prejudice to any other rights or remedies Sasken may have under this contract or applicable law.
- The Supplier represents and warrants that it has not engaged in any money laundering activities in connection with obtaining or performing this contract and that it will continue to comply with all relevant anti-money laundering laws throughout the term of this contract.
- The Supplier shall implement and maintain effective monitoring and reporting mechanisms to detect and prevent money laundering within its organization.
- In the event of any violation of the anti-money laundering provisions, Sasken shall be entitled to seek appropriate contractual remedies, including but not limited to damages, indemnification, and specific performance.



### Conflict of interest

- Suppliers are expected to take their decision based on objective reasons. Personal interests and/or relationships of persons acting for or on behalf of supplier shall have no influence on supplier's behaviors and decisions taken. Suppliers are expected to prevent the arising of any conflicts of interest and shall guide their Employees to maintain a clear distinction between business and personal interests. Suppliers are expected to inform on any personal interest that might exist in connection with the relevant business relationship.

### IT security / handling of non-public information / data protection / respect of intellectual property of third party

- Supplier shall take reasonable measures to secure personal data of individuals as well as non-public information (business know-how, intellectual property, trade secrets and especially confidential information) of Sasken. As a result of the future changes and developments in this area, Sasken pays particular attention to the privacy and security requirements of business-to-business (B2B) contracts and is continuously working to integrate them into its structure, organization and processes. Suppliers shall respect and establish a system to behave in a responsible manner in accordance with all applicable privacy laws (including especially the GDPR, IT ACT 2023 and local laws) with personal data, regardless of who it is from e.g. own workers, Employees of Sasken and/or other individuals. Suppliers are expected to have an appropriate IT security procedure established. Where applicable, also products of suppliers shall confirm with the standards of IT and data security.
- This means, including, but not limited to:
  - Appropriate protection of personal data as well as confidential data and business know how Data processing and documentation thereof according to international and national requirements
  - No collection, processing, usage and/or storage of personal data when there is no legal basis (e.g. Mandatory law and/or consent of the individual concerned)
  - Implementation of an appropriate (IT) security system, especially to ensure the protection of personal data and confidential information (including technical and organizational measures to safeguard personal data, products, know-how and business data)
  - Protect data against modification, loss and unauthorized use or disclosure Respect third party intellectual property rights by establishing an appropriate licensing management system
- If the supplier due to the performance of a supply agreement might obtain or is required to obtain access to personal data, the supplier shall prior to any access of the personal data inform Sasken without undue delay about the required access, so that Sasken and the supplier can conclude a data processing agreement in accordance with applicable laws to protect the rights of individual.



### Respect of human rights and labor practices

- The Supplier shall comply with all applicable local, national, and international laws and standards relating to human rights, including but not limited to the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and relevant Indian labor laws.
- This means, including, but not limited to:
  - No forced or compulsory labor / slavery / human trafficking / servitude
  - No child labor (no workers under the age of 15/14 in accordance with ILO Conv. 138)
  - No workers under the age of 18 for hazardous work or any work
  - No discrimination and fair labor practice
  - Freedom of association and collective bargaining

### Ethical recruitment

- Sasken promotes transparent and objective recruiting and hiring processes that are aligned with the organization's values and its commitment to Diversity, Equity and Inclusion. Employees are hired lawfully and in a fair manner that respects and protects their rights.

The principle of equal opportunity and non-discrimination is strictly observed in recruitment and throughout the entire Employee cycle - recruitment, onboarding, learning and development. Employees and job applicants will not be discriminated against on grounds of gender, age, race, faith or religion, skin color, nationality, ethnic origin, political or other beliefs, sexual orientation, disabilities, or family status.

Sasken also provides the same level of information to all foreign applicants, candidates and Employees, including details of

- the likely cost of living in the area the prospective employer is situated,
- the likely duration of the employment in question and
- the state of the employment market in the field the applicant, candidate or Employee is being recruited.

### Prohibition of modern slavery

- Sasken expects its supplier strictly to not tolerate any forms of modern slavery such as forced or bonded or servitude or compulsory labor, human trafficking or practices similar to that, especially other forms of domination or oppression in this context. Suppliers shall adhere to the standards and provisions laid down in international conventions and local regulations.

### Young workers and prohibition of child labor

- Sasken does not tolerate child labor in any form and its strictly prohibited and Sasken expects its suppliers to strictly comply also to this requirement. Moreover, its Sasken's expectation that supplier also secures compliance in its own supply chain. Suppliers have to act in particular in accordance with the two fundamental ILO conventions on child labor (Convention No. 138 on Minimum Age and Convention No.182 on the Worst Forms of Child Labor). Suppliers shall not employ anyone younger than 18 years of age, who is still of compulsory school age or who has not reached the legal minimum age for employment,



whereby the regulation with the strictest age limit shall take precedence. Supplier shall establish an action plan including remedies to be executed without undue delay and in accordance with international standards and local requirements, in case of discovery of violations of the prohibition of child labor. Legally permissible employment of young people, including the development of permissible on-the-job training programs for the benefit of the education of young people shall be supported by the supplier. Suppliers must prohibit Employees under the age of 18 from activities that endanger their health or safety (e.g. night work, overtime, working with toxic or hazardous substances).

#### Deployment of private or public safety forces

- Sasken ensures respecting human rights and is bound by the Code of Conduct. The use of private or public security forces shall be refrained from if, during their use/deployment, persons are subjected to inhuman or degrading treatment or restrictions on freedom of association.

#### Fair labor practices / diversity & equal opportunities and non-discrimination

- Supplier shall respect the right of their Employees in accordance with all relevant legislations, regulations and directives. Sasken expects its supplier to promote diversity and equal opportunities within its company and to enforce the employment of individuals of a variety of ethnic backgrounds, cultures, religions, ages, levels of ability (disabilities), races, sexual identities and persuasion, genders and mindsets. Suppliers are expected to provide a workplace free of harassment or discrimination and should foster a social environment with respect for all individuals. Suppliers should implement measures to avoid any form of discrimination and unacceptable treatments of individuals and to promote in this regard also an awareness of its Employees. This means, including, but not limited to:
  - No discrimination based on gender, age, religion, social background, disability, ethnic, national or territorial origin, nationality, political affiliation or opinion, sexual orientation, gender identity, family responsibility, marital status, skin color, disease, pregnancy, or other criteria
  - zero tolerance related to unacceptable treatments of individual, e.g. any forms of harassment, abuse or mental cruelty
  - promotion of diversity and equal opportunities for all Employees
  - respect of freedom of association and collective bargaining
  - fair and reasonable payment of wages and benefits to Employees (in respect of applicable minimum wages by law; collective bargaining agreements and industry standards as the case may be) Respect of working hours regulations and laws

#### Supplier Diversity Program and Classifications:

- Our Supplier Diversity Program is committed to encouraging an inclusive supply chain that reflects the diverse communities we serve. Suppliers are encouraged to achieve and maintain relevant diversity classifications, such as minority-owned, women-owned, veteran-owned, LGBTQ+-owned, and small disadvantaged businesses. This commitment to diversity is integral part of our procurement processes and standard operating procedures, ensuring that diverse suppliers have equitable opportunities to compete and succeed. By collaborating with a diverse range of suppliers, we aim to drive innovation, promote economic growth, and uphold our values of fairness and inclusion throughout our operations. We expect our suppliers to follow these practices to uphold Diversity and inclusion in their respective corporate practices



### Minority Rights

- Sasken is committed to fostering an inclusive and diverse workplace that respects and promotes the rights of all individuals, regardless of their minority status. This Minority Rights Guidelines document outlines the principles and practices that guide our organization in creating an environment where every Supplier feels valued, respected, and included. And Sasken expects the supplier too should follow the same principles :
  - Sasken provides equal opportunities for career development and advancement to all employees, irrespective of their minority status. The organization will ensure that recruitment, promotion, and training processes are fair, unbiased, and based on merit.
  - Discrimination based on race, ethnicity, religion, gender, sexual orientation, disability, or any other minority status will not be tolerated. Employees found engaging in discriminatory behavior will be subject to disciplinary action, up to and including termination.
  - Sasken is committed to maintaining a workplace free from all forms of harassment, including but not limited to verbal, physical, or visual harassment. Harassment on the basis of minority status will be treated with utmost seriousness, and prompt action will be taken to address and resolve such issues.
  - All employees, including managers and executives, will undergo regular diversity and inclusion training to foster awareness, understanding, and sensitivity towards minority rights. This training will aim to build a culture of respect and appreciation for diversity within the organization.
  - Sasken recognizes the importance of affirmative action to promote diversity and inclusion. The organization will proactively implement measures to ensure fair representation of minorities in various levels and departments, especially in leadership roles.
  - All individuals at Sasken have the opportunity to submit their grievances through a designated platform, and these concerns will be promptly addressed in accordance with the grievance redressal process.
  - The organization is committed to accommodating employees' religious practices to the extent feasible. Reasonable adjustments will be made to work schedules and practices to ensure that employees can observe their religious practices without hindrance.
  - Sasken has established a confidential and accessible reporting mechanism for employees to report any instances of discrimination, harassment, or unfair treatment related to minority rights. The organization pledges to investigate all reported incidents promptly and take appropriate action.
  - Sasken never makes any discrimination towards minority-owned businesses and suppliers .
  - These Minority Rights Guidelines will be regularly reviewed and updated to ensure their effectiveness and relevance in creating an inclusive and diverse workplace.

### Women's Right:

Sasken is committed to providing equal opportunities to all employees, regardless of gender. All recruitment, promotion, and training opportunities will be based on merit and competence.

- Discrimination based on gender, including but not limited to hiring, promotion, compensation, and work assignments, is strictly prohibited.
- Any form of harassment, including sexual harassment, will not be tolerated. Employees are encouraged to report any incidents promptly to the POSH committee, and Sasken will take immediate action to address and resolve such matters.



- Sasken recognizes the importance of work-life balance. Flexible work hours, remote work options, and other flexible arrangements will be considered to support employees, especially women, in balancing professional and personal responsibilities.
- Sasken adheres to statutory provisions related to maternity leave. Additionally, the company encourages a supportive environment for both men and women and offers paternity leave to fathers for the well-being of their families.
- Sasken is committed to providing equal opportunities for career development and advancement. Training and mentorship programs will be implemented to help women employees enhance their skills and progress in their careers.
- Regular awareness and training programs will be conducted to foster a gender-sensitive workplace. These programs will cover topics such as unconscious bias, diversity and inclusion, and respectful communication.
- Sasken is dedicated to maintaining a safe and inclusive workplace. Employees are encouraged to report any concerns related to safety, harassment, or discrimination, and the company will take appropriate action to address and resolve such issues.
- While all the women staff has to leave the premise before 7PM, in the event of unavoidable delay, Sasken will ensure that the women staff is dropped till home providing Security escort ensuring the safety of women employees
- Sasken is committed to ensuring pay equity among employees.
- Sasken respects the confidentiality and privacy of its employees. All information related to personal matters, including but not limited to maternity and health issues, will be treated with utmost confidentiality.
- Sasken has established a robust grievance redressal mechanism for addressing any concerns related to women's rights. Employees are encouraged to use this mechanism for prompt and fair resolution.

#### **Freedom of association and collective bargaining**

- Suppliers must respect the freedom of association and the right to collective bargaining. Suppliers shall ensure that Employees are free to exercise their rights and are not subject to any form of harassment or reprisal.

#### **Wages and benefits**

- Suppliers must offer fair and reasonable wages and benefits to all Employees according to the applicable laws and regulations (minimum wages, compensations laws). Compensation and benefits shall be provided according to the applicable regulations.

#### **Working hours**

- Suppliers adhere to all applicable working hours regulations globally and ensure compliance at any time, especially when Employees working from home/mobile offices.

#### **Health and Safety**

- Suppliers shall act in compliance with all statutory and international standards as well as regulations related to occupational health and safety and the measures to be taken in this regard.
- Suppliers should provide safe working conditions and a safe and healthy working environment to their Employees, including fire safety. Suppliers shall establish a reasonable occupational health and safety management system (including guidelines, procedures and regular risk assessments, and an incident and accident management system), e.g. in accordance with ISO





14001 or shall implement other reasonable procedures depending on the specific business activities and corresponding risks. This means, including, but not limited to:

- Provision of appropriate regular training and working instructions to Employees including occupational safety, emergency preparedness, machine safeguard, fire safety etc.
- Taking of preventive actions and measures to avoid accidents/near-accidents and emergency preparedness
- To ensure, that all Employees act according to the applicable health and safety laws and regulations,
- Regular reviews, evaluations and elimination of identified potential health and safety risks by taking of reasonable risk mitigation measures
- Provision of appropriate safety equipment, personal protection equipment, first aid/ firefighting equipment and any other material necessary for emergency preparedness as well as ergonomic workplaces

#### Workplace ergonomics

- Workplace ergonomics plays a crucial role in keeping Employees fit and healthy throughout their working lives. Sasken provides a safe and healthful workplace for its Employees. While ergonomic workstations provide optimal working conditions, technical aids facilitate the work of Employees and promote favorable ergonomic postures. At most Sasken's offices and work sites, visiting doctors are available to provide medical treatment in the workplace and advice on ergonomic workplace design.

#### Emergency preparedness and response

- Sasken is committed to taking reasonable measures to ensure safety of the workplace in accordance with national requirements, in order to prevent emergencies, work accidents and to protect the health of its Employees. These include procedures for notification and evacuation of Employees, emergency training and drills, first-aid training, availability of appropriate first-aid materials, adequate fire detection and suppression equipment and sufficient exit facilities. Valid local regulations on occupational protection, health and safety in the workplace, as well as building safety and fire protection have been observed, to reduce the risk of accidents and work-related illnesses to a minimum. Sasken provides all Employees with regular training to develop their security awareness and behavior.

#### Accident/incident management

- Sasken ensures that arrangements are made for emergency management and response in accordance with applicable laws and regulations. These include Employee alerting and evacuation, dispatching of first aiders and application of fire extinguishing equipment.

#### Personal protective equipment

- The Personal Protective Equipment provides a high level of safety and complies with legal requirements. Its purpose is to reduce Employee exposure to hazards when engineering and administrative controls are not feasible or effective to minimize this risk to an acceptable level. Whenever necessary, Employees are provided with appropriate Personal Protective





Equipment. Sasken provides such equipment free of charge and ensures that it is in good working order and hygienic condition.

#### Machine safety

- Sasken is committed to creating a safe and compliant work environment for its Employees. In this regard, machine safety is of paramount importance. Sasken ensures preventive service and maintenance of all machines and work equipment as applicable. In addition, work tools are equipped with appropriate protective devices to prevent injury to workers from contusions, cuts, burns, etc. Sasken provides machine safety training to all Employees before they are allowed to operate any machine.

#### Handling of CBRN hazards

- While this may not be applicable for the kind of business we are in, Sasken protects its Employees from all chemical, biological, work-related hazards. Appropriate risk mitigation includes technical, organizational, personal and informal measures. In particular, if potentially hazardous substances and processes can't be avoided, Sasken takes into account occupational health and safety. All related health and safety measures mentioned above apply. Wherever possible Sasken strive to substitute them with less hazardous ones.

#### Environmental responsibility

- Suppliers are expected to have a clear understanding of the environmental risks, impacts and responsibilities they have associated with their business conduct and the products/services they supply. Suppliers should have a process in place to mitigate these risks and to ensure that its operations shall confirm to all applicable environmental legislations. This shall mean, including, but not limited to:
  - Establishing of a reasonable environmental management system, preferably with ISO 14001 certification
  - Documentation and maintenance of all required environmental permits, approvals and registrations
  - Minimization of pollution
  - Preservation of water quality
  - Minimization of water consumption, usage of energy, raw materials and resources
  - Minimization of emissions and responsible waste handling e.g. by putting best efforts to re-use and recycle materials
  - Separation and safe keeping of chemicals, oils, batteries and any other hazardous waste
  - Safe handling, storage and labelling of chemicals
  - performance of regular risk assessments related to the negative environmental impact of business conducts and products/services to be supplied

Sasken expects its suppliers to contribute to Sasken's environmental objectives as laid down by Sasken and to collaborate with Sasken to improve the environmental performance of Sasken's supply chain.

#### Responsible mineral sourcing / REACH and RoHS compliance

- In connection with the respect of human rights, suppliers are also expected (if applicable for their business operations), to establish a procedure to avoid conflict minerals.



- The Supplier shall ensure that all minerals used in the products supplied under this contract, including but not limited to tin, tungsten, tantalum, and gold, are sourced from conflict-free regions and do not finance armed conflict.
- The Supplier shall exercise due diligence on the source and chain of custody of these minerals in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- The Supplier shall maintain and provide, upon request, full transparency and documentation regarding the source of minerals used in the products supplied. This includes providing information about smelters and refiners in the supply chain.
- The Supplier shall comply with all applicable laws and regulations relating to conflict minerals, including but not limited to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. The Supplier shall provide the Sasken with an annual report on its efforts to ensure responsible mineral sourcing.
- The Supplier shall ensure that all substances, mixtures, and articles supplied under this contract comply with the EU REACH Regulation (EC) No 1907/2006. This includes ensuring that all substances are registered, evaluated, authorized, and restricted as required by REACH.
- The Supplier shall provide Safety Data Sheets (SDS) for all substances and mixtures supplied under this contract, in accordance with the requirements of REACH. The SDS shall be provided in English and any other relevant language as required by the Sasken.
- The Supplier shall communicate information on substances of very high concern (SVHC) present in articles supplied under this contract. This includes providing information on the safe use and disposal of such articles.
- The Supplier shall monitor and report any updates to the REACH compliance status of the substances, mixtures, and articles supplied. The Supplier shall notify the Sasken of any changes in compliance status immediately.
- The Supplier shall ensure that all products supplied under this contract comply with the EU RoHS Directive 2011/65/EU (RoHS 2) and its amendments. This includes ensuring that products do not contain any restricted substances beyond the allowable limits specified by the RoHS Directive.
- The Supplier shall ensure that the products supplied do not contain restricted substances, including lead (Pb), mercury (Hg), cadmium (Cd), hexavalent chromium (Cr6+), polybrominated biphenyls (PBB), and polybrominated diphenyl ethers (PBDE), above the maximum concentration values specified by RoHS.
- Supplier shall provide the Sasken with all necessary documentation and certification to demonstrate compliance with the RoHS Directive. This includes providing a Declaration of Conformity (DoC) and technical documentation upon request.
- The Supplier shall implement and maintain a compliance monitoring system to ensure ongoing adherence to the RoHS Directive. The Supplier shall notify the Sasken of any non-compliance issues immediately and take corrective actions as required.
- The Sasken reserves the right to terminate this contract immediately upon written notice if the Supplier breaches any of the provisions of these compliance clauses. Such termination shall be without prejudice to any other rights or remedies the Sasken may have under this contract or applicable law.

#### Usage of original parts / counterfeit parts prevention

- Sasken sources only original parts for its products and services and aims to ensure that no counterfeit parts are used within its supply chain. Suppliers shall implement and maintain effective methods and processes to identify and minimize the risk of counterfeit parts and materials being introduced into the supply chain relating to Sasken. If any incident within the supply chain is suspected or detected, procedures shall apply and be initiated to quarantine the product and all recipients of counterfeit products shall be informed properly.



### Sustainable resources management / waste reduction / hazardous substances

- Suppliers shall ensure to minimize and to possibly avoid waste of all types, e.g. the reduction of water consumption as well as to promote the reduced usage of energy, fossil fuels, minerals and other resources, including raw materials. Waste treatment shall be in accordance with environmental laws. Suppliers shall advise and implement respective processes and procedures to identify, label, and instruct their Employees on the safe handling, movement, storage, use, recycling or reuse, and disposal of chemicals, waste, and other materials posing a hazard to humans or the environment.

### Pollution prevention / energy efficiency / renewable energy

- Suppliers shall take appropriate measures to minimize their pollution, including carbon emissions and greenhouse gas emissions. The use of renewable energy sources, e.g. from photovoltaic systems or wind turbines, shall be encouraged over the use of non-renewable energy sources. Suppliers shall further focus on the efficient use of energy, water and raw materials.

### Animal welfare

- The responsible treatment of living beings is part of Sasken's values. Compliance with national and international legal standards on animal protection and animal welfare is a matter of course. Sasken Supplier Code of Conduct, Sasken is committed to implementing high animal welfare and traceability standards in its business operations. In particular, Sasken is committed to the highest standards for endangered species and condemns any mistreatment of animals.

### Biodiversity, land use and deforestation

- Sasken's sustainability strategy aims to protect and restore biodiversity - with a particular focus on forests and land. For Sasken, protection of the environment includes protection of biodiversity. Sasken's business activities do not involve native forest conversion and/or unsustainable logging and promote conservation of natural forests as well as their ecosystem services and biodiversity. Sasken is committed to avoid deforestation in all forms. All Sasken activities minimize disturbance to protected areas and local flora and fauna.

### Water and soil protection

- Sasken ensures that it does not cause harmful soil contamination, water pollution, air pollution or avoidable greenhouse gas (GHG) emissions. Healthy soils are essential for achieving climate neutrality, a clean and circular economy as well as halting desertification and land degradation. They are also essential to reserve biodiversity loss, provide healthy food and safeguard human health. To this end, Sasken implements management systems to measure, mitigate and demonstrate continuous improvements of environmental impacts of its own operations and along its value chains. Furthermore, Sasken shall not cause excessive water consumption that adversely affects human health, access to clean water or sanitation or that has a significant negative impact on the natural resources needed to preserve and produce food.



### Noise emission

- Sasken aims to minimize noise emissions at its sites. Sasken has implemented operating procedures to comply with applicable legal requirements on noise emission. To minimize the impact of noise on the environment and people from the outset, noise control measures are taken into consideration as early as the planning of operational processes and also during the modification or reconstruction of existing sites.

### Adherence to export, import and trade controls

- The importing and exporting of products and services are highly regulated. Sasken expects its suppliers to comply with all applicable export controls, laws and regulations in the countries in which they operate. Sasken expects from its suppliers, that the foreign trade regulations are carefully complied with when goods are traded or transported, services are provided, or other technical know-how or software is transferred, including regulations on EU and US sanctions lists are checked as well as an appropriate background check regarding politically exposed persons and an appropriate documentation is made.

### Supplier's supply chain

- Sasken expects its suppliers to use their best efforts to extend the principles embodied in this Sasken Supplier Code of Conduct to their suppliers and agents that are engaged in the production, supply and support of products or services for Sasken. Suppliers are recommended to ensure this by a properly documented risk-based due diligence for their own supply chain and that suppliers take suitable measures to ensure that their suppliers permanently meet the minimum requirements as laid down herein (e.g. by self-assessment requests, auditing). Suppliers might also use towards their supply chain their own code of conduct, provided the standards of the Sasken Supplier Code of Conduct are contained therein.

### Control mechanism

- Sasken regularly monitors and evaluates supplier performance and, where appropriate, performance within its upstream supply chain. Sasken expects each supplier to be willing to continually improve its sustainability and complies with all requirements laid down in this Sasken supplier Code of Conduct and any update hereof. Sasken may request from time to time from their suppliers a self-assessment related to the requirements laid down in this Sasken Suppliers Code of Conduct. Sasken might also conduct regular, one-time and/or event-driven audits at supplier's premises and/or sites to monitor supplier's compliance. Sasken expects the best possible cooperation from its suppliers when they are asked to conduct audits or provide information, or when Sasken needs to conduct on-site inspections to meet the legal requirements imposed on Sasken or its affiliates. Information on compliance performance and progress of improvements must be made available to Sasken on request. Suppliers shall notify Sasken as soon as reasonable, when suppliers become aware of existing violations of applicable laws, regulations and material requirements of this Sasken Supplier Code of Conduct provided that this violation can be considered to have a material influence on Sasken's business and/or reputation.

### Consequences of non-compliance

- Sasken expects its suppliers to fully comply with the Sasken Supplier Code of Conduct. Sasken shall be informed immediately of any violations of the Sasken Supplier Code of Conduct. Violations constitute a deterioration of the business relationship between Sasken and the respective supplier. In case of minor violations of the Sasken Supplier Code of Conduct, the



supplier will be requested by Sasken to agree on a reasonable timeframe within which they will correct the deviation in consultation with Sasken. Suppliers shall provide evidence to Sasken that the violation has been corrected. In particular, if a supplier discovers that a violation of a human rights-related or an environment-related obligation has already occurred or is imminent in its own business area or at a direct supplier, it must inform Sasken without undue delay. The Supplier and Sasken shall without undue delay agree on an appropriate remedial plan of action to avoid, terminate or minimize the extent of any violation. In case of a significant breach as well as a violation of essential material principles (e.g. human rights) or if no measures have been taken to correct the breach(es) within a reasonable period as requested by Sasken, or if the measures taken were insufficient and the breach has not been remedied, Sasken reserves the right to terminate any agreements with the supplier with immediate effect.

### Reporting of non-compliance and concerns

- Everyone is entitled to report proven or suspected violations of compliance regulations. In case of (possible) violations in the supply chain against the above requirements, please get in contact via email: [whistleblower@sasken.com](mailto:whistleblower@sasken.com)
- All complaints can be submitted confidentially as well as anonymously, if desired, at any time. All complaints will be investigated.
- Sasken runs an annual vendor satisfaction survey, the results of which is directly going to Sasken CFO without any mediation. Suppliers are welcome give their candite feedback which will be immediately acted upon by the Sasken management.

## Preliminary Assessment of Supplier - Checklist

### Company Information

Supplier Name:

Contact Information:

Address:

### Environmental Impact

1. Does your company have an environmental policy? (Yes/No)
2. Please provide details of your environmental management system.
3. What measures are taken to reduce waste and pollution?
4. How does your company manage energy and water usage?

### Social Responsibility

1. Does your company adhere to labor laws and standards? (Yes/No)
2. Please describe your employee health and safety policies.
3. What community engagement or development programs are in place?

### Ethical Sourcing

1. Do you have a policy for ethical sourcing of materials? (Yes/No)
2. How do you ensure your supply chain is free from forced or child labor?



### **Sustainability Goals and Reporting**

1. What are your company's sustainability goals for the next year?
2. How does your company report on sustainability performance?

### **Certifications and Compliance**

1. List any environmental or social responsibility certifications your company holds.
2. Are there any past or ongoing legal issues related to environmental or social practices?

### **Innovation and Continuous Improvement**

1. What initiatives are in place for continuous improvement in sustainability?
2. Describe any innovative practices or technologies your company has adopted.

