



Soneva Supplier Code of Conduct

Commitment

We are committed to operate with honesty, integrity, and the highest ethical standards, and to grow our business in a way that respects human rights and positively impacts on the environment and local communities.

Expectations of our suppliers

We expect and require that all suppliers we work with share our commitment to this Supplier Code of Conduct. These are informed by the Universal Declaration on Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the Ten Principles of the UN Global Compact and the UN Guiding Principles on Business and Human Rights. We expect our suppliers to adhere to these standards across their own business and to apply these standards across their own supply chains. Soneva reserves the right to conduct unannounced assessments and on-site audits to ensure compliance with the Supplier Code of Conduct. Whilst it is our intention to work with suppliers to resolve any issues identified, material breaches of the Supplier Code of Conduct may lead to termination of contract.

Our standards

Soneva suppliers must comply with the following standards:

- **Legal compliance**
Comply with the laws and regulations in the countries in which they source, operate and supply. All other applicable international laws and regulations related to the conduct of business must also be complied with.
- **Labour practices**
Comply with applicable laws and regulations including those concerning hours, compensation, opportunity and working conditions.
- **Forced labour & Human Trafficking**
Soneva has a zero-tolerance approach to forced labour and human trafficking. Supplier should support the elimination of all forms of forced, bonded, debt or compulsory labour. It should respect the freedom of association and the right to choose a collective bargaining representative, if desired.
- **Child Labour**
Suppliers should not recruit children who are under 15 years of age or the lawful age of employment (whichever is higher) and condemn all forms of exploitation of children.
- **Harassment and Non-Discrimination:**
Supplier should support and uphold the elimination of discriminatory practices with respect to all aspects of employment, and promotes and embraces diversity and inclusion within our business operations.
- **Safe Working Environment:**
Provide a safe, secure and healthy working environment in compliance with all applicable health, safety and security laws.



- **Sustainability**

Respect the environment including complying with sustainability regulations and in making business decisions suppliers are expected to attempt to:

- preserve and protect the environment and reduce environmental impact;
- minimize the use of endangered and non-renewable raw materials wherever practicable and feasible;
- eliminate single-use plastic packaging;
- undertake initiatives integrate sustainable technologies in order to reduce the use of energy and water, and re-use/recycle the resources consumed by their business; and
- monitor, record and benchmark their environmental performance on a regular basis

- **Land Rights**

Ensure any land acquisition respects the rights of individuals and communities impacted.

- **Business Integrity and Anti-Bribery**

Suppliers are expected to act with integrity. Bribery and any form of financial crime, including improper payments, money laundering and tax evasion or the facilitation of tax evasion, are not permitted under any circumstances.

- **Gifts and Entertainment**

Ensure any gifts or entertainment to Soneva are not used to improperly influence business transactions or decisions related to awards of future business.

- **Conflicts of Interest**

Suppliers are expected to compete on the merits of their products and services. Suppliers are required to implement appropriate mitigations against and disclose to Soneva any real or perceived conflict of interest.

- **Confidentiality and Data Protection**

Respect Soneva's confidential and proprietary information as well as its employee and customer privacy and personal information.

- **Accurate Financial Records**

Accurately record and disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws, regulations and good industry practices.

- **Grievance Mechanisms**

Establish grievance mechanisms for workers to report concerns, including processes for anonymous complaints to be raised, communicate these mechanisms to workers and respond to concerns raised in a fair and timely manner.

Reporting Concerns

We expect our Suppliers to raise concerns about any potential breach of our Supplier Code of Conduct or concerns regarding our business conduct. Concerns can be raised directly with your Soneva contact.