

Sorainen supplier
code of conduct

SORAINEN

Sorainen is an international business law firm working as one integrated team with a core purpose - to grow prosperity in the region by helping our clients succeed in business. Our values are client focus and business-mindedness, excellence and innovation, teamwork and sharing know-how, ethics and respect.

Sorainen is dedicated to maintaining the utmost levels of strong governance, and fair and encouraging labour conditions, as well as taking a precautionary approach to environmental challenges and creating long-lasting positive social impact as outlined in our [ESG policy](#). We believe that sustainable transformation starts with us and that our supply chain plays a critical role in achieving our goals.

Sorainen procures a wide range of products and services, including office equipment, stationery, IT hardware and software, insurance, telecommunication, consulting and other services. We are responsible for ensuring that our suppliers adhere to high standards of ethics and compliance and act according to applicable laws and fair business practices.

Thus, we prepared this Code of Conduct outlining the main principles, values and commitments that Sorainen expects its suppliers to comply with or act by.

Applicability, non-compliance and reporting

This Code of Conduct applies to all Sorainen suppliers, ie any product supplier and/or service providers Sorainen is entering into contractual relationships with to purchase products or services. Suppliers may refer to an individual, company, public institution or any entity that provides goods or services to Sorainen (**Suppliers**).

We expect our Suppliers to commit to a culture of integrity, honesty, and transparency and to promptly report any known or suspected violations of applicable laws or this Code of Conduct. Sorainen reserves the right to request documentation and information to verify compliance with the Code of Conduct and applicable laws and regulations.

Sorainen aims to support its Suppliers to comply with this Code of Conduct and deal with any risks or failures of non-compliance ethically and fairly. The Supplier shall suggest relevant corrective measures and act to deal with non-compliances or risks of non-compliance with no delay. Lack of action, cooperation or failure to act on time may result in the termination of the business relations between Sorainen and the respective Supplier.

If Suppliers encounter situations that go against the Supplier Code of Conduct or applicable laws, they should promptly contact Sorainen through their representative or by sending an email to sustainability@sorainen.com or the Supplier's other contact at Sorainen.

I. Compliance

As a Supplier to Sorainen law firm, you are expected to operate in full compliance with all applicable laws, regulations, and industry standards in the countries where you conduct business. Adherence to legal requirements is essential to maintaining the highest standards of ethical behaviour and ensuring a trustworthy and sustainable partnership.

Trade and sanctions

Suppliers must comply with all international trade laws, export control regulations, and economic sanctions imposed by relevant authorities. This includes adhering to restrictions on the export, re-export, or transfer of goods, services, or technology to sanctioned individuals, entities, or countries. It is the Supplier's responsibility to conduct proper due diligence to ensure that the Supplier's business activities do not violate any trade restrictions.

Money laundering and tax evasion

Suppliers must strictly prohibit any involvement in money laundering or tax evasion activities. Suppliers are required to implement appropriate measures to prevent money laundering and the illicit flow of funds through the Supplier's organisation. Additionally, all tax obligations must be met under the tax laws of the respective jurisdictions where the Supplier's operations are conducted.

Bribery, corruption and conflict of interest

Suppliers must not engage in any form of bribery, corruption, or unethical practices. You shall not offer, promise, or provide any improper benefits to Sorainen's employees or any other individuals, in exchange for business opportunities or preferential treatment. Additionally, the Supplier must disclose any potential or actual conflicts of interest that may arise during the Supplier's

business dealings with Sorainen. Transparent and fair transactions are fundamental to fostering trust and maintaining the integrity of our business relationships.

Data privacy and security

Suppliers are expected to handle all data and information with the utmost care and in compliance with applicable data protection laws, including the [the EU General Data Protection Regulation 2016](#). This includes ensuring the confidentiality, integrity, and availability of any personal or sensitive data Supplier processes on behalf of Sorainen law firm. Proper data protection measures, such as data encryption, access controls, and data retention policies, must be in place to safeguard against unauthorised access, disclosure, or misuse of information. We encourage our Suppliers to establish an Information Security Management System under the ISO/IEC 27001 standard.

Permits, licenses and proper incorporation under applicable laws

Suppliers must obtain and maintain all necessary permits, licenses, and certifications required to operate legally in the jurisdictions where Suppliers provide goods or services to Sorainen law firm. Furthermore, Suppliers must be properly incorporated and registered under the laws of the respective countries to conduct business.

II. Business ethics, human and labour rights

At Sorainen, we value strong governance practices and uphold the highest standards of business ethics. As a supplier to our firm, you are expected to share our commitment to ethical conduct and adhere to the following principles:

Fair competition

Suppliers must compete fairly and ethically in all markets. Suppliers shall not participate in anti-competitive practices, collude with competitors, engage in price-fixing, or manipulate bids to gain unfair advantages. We promote open and competitive markets, and all suppliers are expected to respect these principles. Sorainen also expects its Suppliers to cooperate with a high level of professionalism and be guided by the best interest of Sorainen as a customer/client.

Communication and marketing

Sorainen expects its Suppliers to adhere to the principles of responsible marketing and communication, including being transparent and honest in their messages, not including information or statements that are misleading, misrepresenting, concealing, exaggerating, greenwashing or otherwise do not correspond to reality and facts about Suppliers' products, services or business in general.

Human and Labour Rights

Supplier's business practices shall not violate the fundamental rights and dignity of individuals.

Prohibition of Forced and Involuntary Labour: Suppliers must not use any form of forced, bonded, or involuntary labour in their operations or supply chains. Suppliers must have written employment or other applicable form of contract as required by applicable laws.

Prohibition of Child Labor: Suppliers must comply with all applicable laws and regulations concerning the employment of minors and must not employ child labour.

Fair Treatment and Non-Discrimination: Suppliers shall treat all workers and individuals with fairness, respect, and dignity, without any discrimination based on race, ethnicity, gender, religion, disability, or other protected characteristics. Employment decisions shall be based on the job qualifications and merits.

Working Hours and Compensation: Suppliers must comply with local laws and industry standards regarding working hours, overtime, and fair compensation for their workers. Suppliers are expected to provide all their employees with a living wage sufficient to meet the basic needs of employees and their families.

Freedom of Associations: Suppliers must recognise and respect the right of their workers to freely associate, join labour unions, or engage in collective bargaining under applicable laws and regulations. Workers should have the right to express their views, raise concerns, and collectively negotiate their terms and conditions of employment without fear of retaliation or discrimination. Suppliers must not hinder or restrict workers' lawful exercise of their rights to freedom of association.

Occupational Health and Safety: Suppliers shall adhere to all applicable laws on occupational health and safety, ensure adoption of relevant policies and procedures and train all its employees thereon. We encourage our supplier to consider the adoption of an Occupational Health and Safety Management System (eg under ISO 45001).

Human Rights Due Diligence: Suppliers are advised to adopt processes for human rights due diligence, carry out human rights assessment and act upon findings if any. 'Human rights' means internationally acknowledged human rights, including the [UN's Universal Declaration of Human Rights](#), the [International Covenant on Economic, Social and Cultural Rights](#) and the [International Covenant on Civil and Political Rights](#).

Suppliers are also advised to use International Labour Organisation standards as guidance, eg [ILO Discrimination \(Employment and Occupation\) Convention \(No. 111\)](#), [ILO Forced Labour Convention \(No. 29\)](#), [ILO Minimum Age Convention \(No.138\)](#), [ILO Worst Forms of Child Labour Convention \(No. 182\)](#), [ILO Equal Remuneration Convention \(No. 100\)](#), [ILO Right to Organise and Collective Bargaining Convention \(No. 98\)](#), [ILO Freedom of Association and Protection of the Right to Organise Convention \(No. 87\)](#), [ILO Occupational Safety and Health Convention \(No. 155\)](#).

Supplier's supply chain and further commitments

Suppliers are encouraged to undertake similar or a higher level of responsibility over their supply chain, adopt relevant mechanisms to ensure that their suppliers adhere to the best industry practices, comply with applicable laws and do business ethically and fairly.

We encourage our Suppliers to adopt their code of conduct and business ethics, as well as provide their employees with relevant training and have a whistleblowing policy in place. As guidance, suppliers may use the UN's Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the OECD Due Diligence Guidance for Responsible Business Conduct.

III. Environment

As a responsible and sustainable firm, Sorainen is committed to protecting the environment and promoting environmentally friendly practices throughout our operations. We expect our Suppliers to share this commitment and adhere to the following environmental commitments:

No significant damage to the environment and/or local community, resulted in claims and/or penalties from relevant authorities

Suppliers must conduct their business in a manner that avoids causing significant harm to the environment and local communities. This includes complying with all relevant environmental laws, regulations and permits applicable to their activities. Suppliers should proactively assess and manage potential environmental risks to prevent incidents that could lead to claims or penalties from relevant authorities.

Environmental Management

We recommend Suppliers to adopt an environmental management system, eg under ISO 14001 and apply circular economy principles. Suppliers are encouraged to prioritise energy efficiency and the use of renewable energy sources to power their operations. Suppliers are encouraged to measure, monitor, and manage their greenhouse gas emissions under scopes 1, 2 and 3 as described in the GHG Protocol Corporate Standard. The Suppliers are encouraged to set emission reduction targets and adopt climate transition plans that contribute to mitigating climate change and reducing their carbon footprint.