

Guidelines for External Companies

Sade International | Sofia, Bulgaria · Istanbul, Türkiye | Version 2.0 · March 2022

1. Purpose and Scope

These Guidelines define the principles that Sade International (“Sade International”) expects from its suppliers, subcontractors, agents, logistics providers and other business partners (“External Companies”). They apply to all business relationships with Sade International and complement, but do not replace, contractual obligations and applicable law.

2. Legal Compliance

External Companies shall comply with all laws and regulations applicable to their business, including trade, customs, tax, competition, product safety, chemicals legislation (such as REACH, CLP and equivalent regimes), food safety and data protection legislation.

3. Business Ethics and Anti-Corruption

Sade International applies zero tolerance to bribery and corruption in any form. External Companies shall not offer, promise, grant or accept any improper payment or advantage, directly or indirectly. Gifts and hospitality must be modest, transparent and consistent with customary business practice. Accurate books and records shall be maintained at all times.

4. Fair Competition

External Companies shall compete fairly and comply with applicable antitrust and competition laws. Price fixing, market or customer allocation, bid rigging and abuse of a dominant market position are prohibited.

5. Human Rights and Labour Standards

External Companies shall respect internationally recognized human rights. Child labour and any form of forced or compulsory labour are prohibited. External Companies shall not tolerate discrimination or harassment, shall pay fair wages, observe lawful working hours and respect freedom of association in accordance with applicable law.

6. Health and Safety

External Companies shall provide a safe and healthy working environment appropriate to the risks of their activities. This includes the safe handling, storage and transport of chemicals and food products, adequate training, suitable protective equipment and appropriate emergency procedures.

7. Environmental Responsibility

External Companies shall comply with applicable environmental laws, use energy and resources efficiently, manage waste, emissions and hazardous substances responsibly, and strive to reduce the environmental impact of their operations continuously.

8. Quality, Documentation and Traceability

External Companies shall deliver products and services that conform to the agreed specifications. They shall provide complete and accurate documentation, including certificates of analysis (CoA), safety data sheets (SDS), certificates of origin and, where applicable, food-safety or other agreed certificates. Traceability of batches and raw materials shall be maintained. Sade International shall be notified without delay of any deviation, non-conformity or safety concern.

9. Communication and Reliability

Sade International values responsive communication and transparency throughout the supply process. External Companies are expected to respond to enquiries in a timely manner, to keep Sade

International informed at each relevant step of the supply process (including order status, production, quality control and shipment), to give proactive notice of potential delays or problems, and to stand behind their products and commitments.

10. Confidentiality and Data Protection

External Companies shall protect confidential information of Sade International and its customers, use it only for the intended business purpose, and comply with applicable data protection laws.

11. Conflicts of Interest

External Companies shall disclose to Sade International any actual or potential conflict of interest in connection with the business relationship.

12. Reporting Concerns

Actual or suspected violations of these Guidelines may be reported to sales@sadeinternational.com. Reports will be treated confidentially. Sade International does not tolerate retaliation against anyone who reports a concern in good faith.

13. Compliance with these Guidelines

Sade International may reasonably verify compliance with these Guidelines, for example through self-assessments, review of documentation or audits agreed with the External Company. Material or repeated violations may lead to corrective action plans and, where appropriate, suspension or termination of the business relationship.