

SUNGWOO HITECH

Supplier social responsibility guideline

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창 조 적
신 기 술 로
C R E A T I V E
N E W T E C H N O L O G Y
F O R T H E B E T T E R F U T U R E
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1. Purpose / Foreword

Dear suppliers,

Automotive industry is constantly evolving and moving forward. The goal is to achieve better and sustainable future for humankind. In order for this to be possible, it is necessary to focus and continuously improve on environmental and social factors in addition to the technological direction.

We, at SUNGWOO HITECH s. r. o., identify with this goal and to share such values in our supply chain we created this Supplier social responsibility guideline.

This guideline is applied to every supplier, that provide goods and services to SUNGWOO HITECH s. r. o. and we would be very grateful to our suppliers to share these values with their own suppliers.

2. Business ethics

2.1. Transparency and anti-corruption

- 2.1.1. The executives and employees of suppliers should comply with the highest standards of integrity of the country where they conduct business operations.
- 2.1.2. The executives and employees of suppliers should not engage in bribery, extortion, money laundering, embezzlement, or graft through abuse of their status, nor gain unfair benefits by taking advantage of weaknesses and deficiencies.

2.2. Conflicts of interest

- 2.2.1. Suppliers should make responsible decisions based on defined operational rules
- 2.2.2. The executives and employees of suppliers should not promise, offer, authorize nor give anything that may lead to the gain of undue or improper benefits. This prohibition covers incurring damage to the company for the benefit of an executive or employee and promising individual benefits through a third party.

2.3. Fair trade and competition

- 2.3.1. Suppliers should comply with the relevant anti-corruption laws and standards of the countries where they maintain business operations.
- 2.3.2. Suppliers should not engage in activities that would disrupt fair competition through the pursuit of unfair transactions, such as abusing their market dominance or trading position.
- 2.3.3. Suppliers should not engage in activities that unfairly restrict competition in the Marketplace with regards to the price, supply volume, area and terms of trade of goods or services.
- 2.3.4. Suppliers should not improperly obtain information from competitors, partners, or other agencies, nor should they use or disclose information obtained illicitly by the company or third parties.

2.4. Counterfeit parts

- 2.4.1. Suppliers should not manufacture nor use unauthorized raw materials and parts, nor use or sell counterfeit raw materials and parts.
- 2.4.2. Suppliers should regularly confirm if counterfeit raw materials or parts are used or manufactured in their workplace, and if detected, should promptly notify the government or clients.
- 2.4.3. Suppliers should confirm that the materials and parts they manufacture are used and distributed to fulfill business objectives and in accordance with contractual obligations.

2.5. Export controls

- 2.5.1. Suppliers should comply with the domestic laws and international agreements applicable to export controls.
- 2.5.2. Suppliers should not engage in business transactions with countries, regions, and individuals under export controls or economic sanctions.
- 2.5.3. Suppliers should confirm whether they comply with the laws and agreements relating to export controls and economic sanctions, and if necessary, should cooperate with SUNGWOO HITECH s.r.o. in its compliance activities.

2.6. Information protection

- 2.6.1. Suppliers should not disclose trade secrets and information relating to their clients or business partners without consent, nor store or use the information they have obtain through performing business duties.
- 2.6.2. Suppliers should respect the intellectual property rights of their clients and business partners, develop appropriate measures to protect intellectual property rights, and regularly confirm whether intellectual property rights are protected.
- 2.6.3. Suppliers should collect and use personal information only within the scope of the original, established purpose and data retention period. Prior consent should be obtained before modifying either the purpose or the retention period.

2.7. Responsible sourcing of materials

- 2.7.1. Suppliers should establish processes to verify the source regions and refineries of all minerals contained in their products, including conflict minerals¹ such as tin, tungsten, tantalum, to gold or minerals originating from conflict areas that directly or indirectly contribute to financing armed groups.
- 2.7.2. Suppliers should, in accordance with the relevant processes, strive to verify social and environmental issues² including gross human rights abuses, violations of ethics, and negative environmental impacts in relation to the source regions and refineries of minerals and raw materials.
- 2.7.3. When primarily handling minerals and raw materials, suppliers should strive to verify, internally and externally, that they are not engaged in human rights abuses, violations of ethics, nor producing negative environmental impacts in the processing of minerals and raw materials.

1 These four minerals, which are extracted in African conflict areas (ten countries including DR Congo), may cause social issues such as human rights abuse and child labor. Exporting these resources may help fund civil wars or conflict, creating international concern.

2 In accordance with the US Securities and Exchange Commission enforcement ordinance in 2012, listed companies are obligated to report whether they use conflict minerals in their products. In 2015, the European Parliament made it mandatory that importers of minerals report, to the relevant national authorities, any issues related to the origin of the minerals imported.

3. Environment

3.1. Establishment of an environmental management system

- 3.1.1. Suppliers should comply with the environmental laws and regulations of the countries where they maintain business operations and obtain all environmental permits and licenses necessary to maintain these operations.
- 3.1.2. Suppliers should operate an environmental management system³ to organize, plan, process and check outcomes to mitigate environmental impacts from business operations.

3.2. Energy consumption and greenhouse gas emissions

- 3.2.1. Suppliers should develop programs to measure energy consumption and greenhouse gas emissions.
- 3.2.2. Suppliers should strive to reduce energy consumption and greenhouse gas emissions.
- 3.2.3. Suppliers should prepare their GHG emissions report annually.

3.3. Water resources management

- 3.3.1. Suppliers should develop water management programs to measure water resource consumption and wastewater discharge.
- 3.3.2. Suppliers should explore methods to minimize water resource consumption and maximize recycling. In addition, they should manage water pollutant discharge in accordance with either legal standards or higher internal standards.

3.4. Air pollutant management

- 3.4.1. Suppliers should develop programs to measure air pollutant emissions.
- 3.4.2. Suppliers should minimize air pollutant emissions through appropriate means. Moreover, they should comply with legal standards to manage air pollutant emissions, or develop and comply with higher internal standards.

3.5. Waste management

- 3.5.1. Suppliers should develop programs to measure the amount of waste produced
- 3.5.2. Suppliers should minimize waste emissions produced through landfill and incineration. In addition, they should strive to reuse and recycle waste, and recover used raw materials or parts that have been disposed of.
- 3.5.3. Considering the entire product life cycle, suppliers should strive to minimize residues from landfill or incineration that affect the environment.

3.6. Chemical management

- 3.6.1. Suppliers should strive to ensure that chemicals handled during the process of business operations are safely managed during transportation, storage, use and disposal. Moreover, information that can be used to identify hazardous or harmful substances should be displayed or otherwise disclosed.
- 3.6.2. Suppliers should strive to verify⁴ whether the raw materials and parts they secure, sell and supply contain any substances that are harmful to the human body or the environment.

3 ISO 14001 and etc. (ISO 14001 is the international standard that specifies requirements for an effective environmental management system (EMS) defined by the International Organization for Standardization (ISO) and organizations can be certified by a third party that they follow the environmental management framework.

4 EU, Restriction of Hazardous Substances Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS) (2006) and etc.

4. Labor / Human rights

4.1. Non-discrimination

- 4.1.1. Suppliers should not engage in any form of discrimination based on gender, race, ethnicity, nationality, religion, disability, age, marital and family status, social identity and political affiliation in hiring and employment practices and access to training.
- 4.1.2. Suppliers should not engage in any form of discrimination in providing wages and workers benefits.
- 4.1.3. Suppliers should not include requirements that are not relevant to the job description when recruiting and hiring.

4.2. Wages and benefits

- 4.2.1. Suppliers should compensate workers in accordance with the applicable laws and regulations of the countries where they maintain business operations. Compensation should be paid on a specified dates and workers should be provided with a clear wage statement.
- 4.2.2. Suppliers should ensure pleasant working conditions and strive to provide all employees with benefits to improve quality of life.
- 4.2.3. Suppliers should provide mandatory training in accordance with the laws and regulations of the countries where they maintain business operations. Moreover, they should strive to help all employees build their careers and strengthen their capabilities.

4.3. Working hours

- 4.3.1. Suppliers should comply with all applicable laws, in relation to legally defined working and resting hours, of the countries where they maintain business operations.
- 4.3.2. Suppliers should ensure that any hours worked beyond normal work hours are voluntary, and provide lawful compensation for overtime if employees work overtime under unavoidable circumstances.
- 4.3.3. Suppliers should ensure that all employees receive at least one day off every week.

4.4. Humane treatment

- 4.4.1. Suppliers should respect the privacy of all employees and refrain from assigning unnecessary overtime tasks.
- 4.4.2. Suppliers should notify employees in advance and obtain voluntary agreement when collecting their personal information.
- 4.4.3. Suppliers should prohibit workplace harassment, which includes any act that may cause physical or mental distress, or that aggravates the working environment for other employees beyond the normal scope of their work. Appropriate changes and measures should be implemented to reduce such harassment, such as disciplinary measures against offending workers and changing workplaces or placements upon request.

4.5. Freedom of association

- 4.5.1. Suppliers should respect the right of employees to associate and bargain collectively, and allow them to form and manage lawful bargaining bodies.
- 4.5.2. Suppliers should engage, with sincerity, in collective bargaining negotiations with the representatives of employees.
- 4.5.3. Suppliers should allow individual employees to freely recommend negotiation terms if their representatives are absent.

4.6. Child labor

- 4.6.1. Suppliers should ban any and all forms of child labor in principle, verifying the age of all employees and applicants through legitimate documents such as identification cards and birth certificates.
- 4.6.2. If hiring young workers, suppliers should not employ them in high-risk jobs as defined by safety and health standards, and should have appropriate measures in place to ensure educational opportunities.
- 4.6.3. Suppliers should not receive goods and services from businesses that are engaged in child labor or that violate applicable laws, and should take necessary action if such violations are confirmed.

4.7. Forced labor (Modern slavery)

- 4.7.1. Suppliers should comply with the labor rules of the countries where they maintain business operations, and prohibit all forms of forced or mandatory labor.
- 4.7.2. Suppliers should not, for the purpose of restricting employees' personal activities, require employees to submit their identification cards or visas, nor should they engage in activities such as assault, intimidation, or confinement for the purpose of forced labor.
- 4.7.3. Suppliers should not receive goods or services from businesses that either restrict the mental and physical freedom of employees or that engage in forced labor due to debt relations, and should take necessary measures if such violations are confirmed.

5. Safety and health

5.1. Occupational health and safety management system

- 5.1.1. Suppliers should comply with the health and safety laws and regulations of the countries where they maintain business operations, obtaining and maintaining all required permits and licenses.
- 5.1.2. Suppliers should operate an occupational health and safety management system that includes organization, planning, procedures, and outcome analysis to prevent health and safety-related accidents.

5.2. Safe management of machines, equipment and tools

- 5.2.1. Suppliers should regularly inspect and evaluate hazardous or otherwise dangerous machine equipment, and tools in the workplace.
- 5.2.2. Suppliers should install and manage protective interlocks and walls and emergency devices to prevent injury hazards to workers that may occur when operating hazardous or otherwise dangerous machines, equipment, and tools in the workplace.
- 5.2.3. Suppliers should provide protective equipment to safeguard individual employees in the workplace. Protective equipment should be easy and convenient to use, and properly maintained to ensure proper function.

5.3. Emergency preparedness

- 5.3.1. Suppliers should have an established plan to respond to emergencies, including natural disasters, cluster infections, fire and other occupational accidents. Moreover, guidelines should be in place that stipulate the reporting process, response procedures, and follow-up in case of emergency.
- 5.3.2. Suppliers should implement worker training and drills emergencies in accordance with their own plans or guidelines, or the laws of the countries where they maintain business operations.
- 5.3.3. Suppliers should have adequate exit routes and signs, fire detection and warning equipment, and fire prevention facilities in case of emergency, and ensure that the above all function properly.

5.4. Accident management

- 5.4.1. Suppliers should have programs to measure industrial accidents and illness.
- 5.4.2. Suppliers should immediately cease operations if an industrial accident or severe disease outbreak occurs, and take necessary countermeasures including the evacuation of employees.
- 5.4.3. Suppliers should investigate the causes of industrial accidents or illness and endeavor to provide relevant improvement plans to reduce their incidence.

5.5. Safety inspection

- 5.5.1. Suppliers should, for the purpose of determining if employees are exposed to risk factors, regularly conduct workplace safety assessments. Assessment results should be disclosed to employees and suppliers should improve machines, equipment, and tools in accordance with the results.
- 5.5.2. Suppliers should provide employees with information on accident risks and factors based on a risk factor assessment. This information should be disclosed in understandable language and displayed in accessible places.
- 5.5.3. Suppliers should not employ pregnant women, young, old or weak workers in high-risk jobs and should endeavor to improve the working environment to support socially vulnerable groups, including the disabled and immigrants.

5.6. Health management

- 5.6.1. Suppliers may provide employees with resting areas, toilet facilities and eating facilities, and should strive to maintain hygiene and cleanliness in such facilities if they are provided.
- 5.6.2. Suppliers may provide employees with worker dormitories, which should be equipped with safety signs, lighting and heating and cooling systems. Moreover, dormitories should have appropriate facilities to limit access by unauthorized personnel.
- 5.6.3. Suppliers should regularly implement general or special medical examinations for employees, in accordance with the health laws of the countries where they maintain business operations. Moreover, suppliers should take necessary measures such as changing workplaces, converting shifts, and reducing work hours to allow employees to attend medical examinations.

6. Management systems

6.1. Company statement disclosure

- 6.1.1. Suppliers should disclose this Supplier Code of Conduct, or their commitment to fulfilling corporate social responsibilities, internally and externally.
- 6.1.2. Suppliers should share this Supplier Code of Conduct, or their commitment to fulfilling corporate social responsibilities, through internal channels, such as the New Year's address by executives, internal guidelines, or the in-house bulletin board. Moreover, they are recommended to disclose them via websites, management reports and publications.

6.2. Health management

- 6.2.1. Suppliers should appoint a supervisor who is responsible for corporate social and environmental sustainability activities.
- 6.2.2. Suppliers should appoint a person who manages the planning and implementation of corporate social and environmental sustainability activities (social responsibility activities).

6.3. Risk assessment

- 6.3.1. Suppliers should endeavor to identify ethical, environmental, labor/human rights, safety/health risks associated with their business operations.
- 6.3.2. Suppliers should develop and implement measures to mitigate risks if significant risks are discovered.

6.4. Training and communication

- 6.4.1. Suppliers should train their employees in the provisions of this Supplier Code of Conduct, as well as the matters governed by the relevant laws and policies.
- 6.4.2. Suppliers should share implementation plans and progress concerning the matters governed by this Supplier Code of Conduct.

6.5. Information management

- 6.5.1. Suppliers should accurately record and manage information concerning ethical, environmental, labor/human rights, and safety/health risks.
- 6.5.2. Suppliers should strive to disclose information in a transparent matter when local laws, industrial associations and important clients with contractual obligations request such information, unless the disclosure is prohibited by law.

6.6. Grievance mechanisms for advice and concern about ethics (Whistleblowing)

- 6.6.1. Suppliers should operate a grievance mechanism allowing employees who confirm or identify violations of ethics, environmental, labor/human rights, safety/health laws and regulations to seek advice and raise concerns. These mechanisms should allow employees to report infringements of their individual rights or interests.
- 6.6.2. Suppliers should protect employees who report ethical concerns relating to unreasonable actions such as layoffs, threats, retaliation, and mockery. Employees who report such concerns should have their identity protected.

6.7. Management of trade partners (Subcontractors)

- 6.7.1. Suppliers should recommend that subcontractors with contractual obligations in planning, designing, selling and manufacturing goods and services should manage ethical, environmental, labor/human rights, safety/health factors.
- 6.7.2. Suppliers should strive to recommend that their subcontractors improve violations or risks concerning ethical, environmental, labor/human rights, and safety/health laws and provisions when they identify such violations or recognize such risks.

6.8. Compliance of supplier code of conduct

- 6.8.1. Suppliers should provide evidence of compliance with this Supplier Code of Conduct during regular written assessments or on-site visits carried out by SUNGWOO HITECH s.r.o. or designated third parties.
- 6.8.2. Suppliers should write and manage appropriate documents⁵ to prove their compliance with this Supplier Code of Conduct. Such documents should be based on facts and reflect business operations.
- 6.8.3. Suppliers should strive to establish and implement plans to swiftly address deficiencies and violations of compliance with this Supplier Code of Conduct, as identified by written assessments or on-site visits.

5 An appropriate document refers to the 'safety and health guidelines based on the Occupational Safety and Health Act, Article 225 (Writing of Safety and Health Guidelines), 'record of occurrence of industrial accidents or disease based on and Article 10 (Publication of Number, etc. of Industrial Accident Occurrences at Place of Business), 'rules of employment' based on the Labor Standards Act, Article 93 (Preparation and Reporting of Rules of Employment), matters such as the amount of wages based on the Labor Standards Act, Article 48 (Wage Ledger), in addition to agreements on ethics code, emergency guidelines, working hours record, workplace inspection outcomes, and other data related to requirements under this Supplier Code of Conduct or that can be used as basis for assessing compliance.

A. APPENDIX 1 - Supplier commitment to CSR

We, at company

hereby declare, that we have been introduced and are aware of content of SUNGWOO HITECH s. r. o. Supplier social responsibility guideline, agree with its policy and are committed to follow and maintain its values.

Signed by:

Name:

Date:

Signature:



B. APPENDIX 2 - Supplier self-assessment questionnaire

Filled by: _____ Company: _____ Date: _____

- 1) **Does the company ensure that its workers are afforded safe, suitable and sanitary work facilities?**
 - a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant

- 2) **Does the company supply its employees with the protective equipment and training necessary to perform their tasks safely?**
 - a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant

- 3) **Does the company ensure that the workweek is limited to 48 hours; that overtime is infrequent and limited; and that employees are given reasonable breaks and rest periods?**
 - a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant

- 4) **Does the company provide a living wage that enables workers to meet the basic needs of themselves and their dependents?**
 - a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant

- 5) **Does the company grant employees paid holiday leave, sick leave, and parental leave in accordance with international minimum standards?**
 - a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant

- 6) **Does the company protect workers from workplace harassment including physical, verbal, sexual, or psychological harassment, abuse, or threats?**
 - a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant

- 7) **Does the company respect the privacy of its employees whenever it gathers private information or monitors the workplace?**
- a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant
- 8) **Does the company have a mechanism for hearing, processing, and settling grievances of employees?**
- a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant
- 9) **Does the company have a procedure to assess and address the environmental and social impact of its operations on the human rights of local communities?**
- a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant
- 10) **Before buying, renting, acquiring or otherwise accessing land or property, does the company ensure that all affected owners and users of the land or property, have been adequately consulted and compensated?**
- a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant
- 11) **Does the company take steps to ensure that company security arrangements are in accordance with international human rights principles for law enforcement and the use of force?**
- a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant
- 12) **Does the company take steps to prevent risks to human rights arising from product defects or improper use or misuse of company products?**
- a) Yes
 - b) No
 - c) Implementation planned
 - d) Not relevant

13) Does the company seek to avoid involvement in human rights abuses owing to government or societal practices in its country or countries of operation?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

14) Does the company promote international human rights standards in its interactions with suppliers and business partners?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

15) Does the company recognize the rights of its workers to freedom of association and to bargain collectively?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

16) If independent trade unions are either discouraged or not allowed in the area of operation, does the company enable employees to gather independently to discuss work-related problems?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

17) Does the company take all necessary measures to ensure that it does not participate in any form of forced or bonded labor?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

18) Does the company comply with minimum age standards?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

19) Does the company ensure that employment-related decisions are based on relevant and objective criteria?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

20) Does the company promote international labor standards in its interactions with suppliers and business partners?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

21) Does the company comply with all relevant environmental legislation?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

22) Does the company manage environmental issues to ensure appropriate and continuous improvements?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

23) Does the company assess and address environmental impacts of its operations before these operations start?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

24) Does the company have emergency procedures in place to effectively prevent and address industrial accidents affecting the environment and human health?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

25) Does the company promote international environmental standards in its interactions with suppliers and business partners?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

26) Does the company support a precautionary approach to environmental challenges?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

27) Does the company take measures to reduce energy consumption and emissions of greenhouse gases?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

28) Does the company take measures to reduce water consumption?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

29) Does the company prevent, reduce and treat waste water discharges?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

30) Does the company take measures to reduce the production of waste and ensure responsible waste management?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

31) Does the company prevent, reduce and treat air emissions?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

32) Does the company prevent and minimize impacts on the surrounding environment from noise, odor, light and vibrations?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

33) Does the company minimize the use of chemicals and other dangerous substances and ensure safe handling and storage?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

34) Does the company remedy soil and water contamination at the site and the surroundings?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

35) Does the company prevent, minimize and remedy significant impacts on biodiversity?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

36) Does the company ensure that natural resources are used in a sustainable manner?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

37) Does the company encourage the development and diffusion of environmentally friendly technologies?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

38) Does the company take a clear stand against corruption?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

39) Does the company evaluate and assess the risk of corruption when doing business?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

40) Does the company ensure that employees know the company's anti-corruption commitment and that relevant persons are properly trained?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

41) Does the company forbid corrupt behavior and monitor its anti-corruption initiatives?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

42) Do the company's internal procedures support its anti-corruption commitment?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

43) Does the company's anti-corruption initiative cover agents, intermediaries and consultants?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

44) Does the company promote its anti-corruption commitment in its interactions with suppliers and business partners?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant

45) Does the company take joint actions with others to engage in and promote anti-corruption initiatives and level the playing field?

- a) Yes
- b) No
- c) Implementation planned
- d) Not relevant