



Soundwich, Inc.'s Sustainability Policy and Code of Conduct

- (1) **Human Rights.** Soundwich, Inc. (hereinafter "Soundwich") respects and supports compliance with internationally-accepted human rights policies:
 - (a) **Forced Labor.** Soundwich condemns all forms of forced and compulsory labor, and does not use forced or involuntary labor, whether bonded, prison or indentured, including debt servitude.
 - (b) **Child Labor.** Soundwich supports the effective abolition of exploitative child labor, and does not employ individuals in violation of local mandatory school age, or under the legal employment age in each country where they operate. In no case does Soundwich employ non-family workers under the age of fifteen (15).
 - (c) **Harassment and Discrimination.** Soundwich upholds equal opportunities with respect to employment and refrains from discrimination in any form, unless national law expressly provides for selection according to specific criteria. Discrimination against employees based on gender, race, disability, origin, religion, age or sexual orientation is not acceptable.
 - (d) **Freedom of Association.** Soundwich respects the right of all employees to form and join groups for the promotion and defense of their occupational interests.
- (2) **Working Conditions.** Soundwich is opposed to all exploitative working conditions:
 - (a) **Protection of Health and Safety.** Soundwich ensures health and safety in the workplace to a level no less than required by national legislation, and support the continual improvement of working conditions.
 - (b) **Compensation.** Soundwich honors the right to reasonable compensation of a level no less than the legally-established minimum wage and the local job market, based on local laws and regulations. Within the scope of national legislation, Soundwich respects the principle of "equal pay for work of equal value."
 - (c) **Working hours.** Soundwich complies with national provisions and agreements regarding working hours and regular, paid holidays.
- (3) **Environment.** Soundwich supports stewardship of natural resources:
 - (a) Soundwich participates in and encourages initiatives to promote greater environmental responsibility.
 - (b) Soundwich complies with all applicable environmental laws and regulations, and promptly develops and implements actions to correct any non-compliant practices.
- (4) **Corruption and Ethics.** Soundwich is anti-corruption in all its forms, including extortion and bribery.
 - (a) As detailed in the *Soundwich Employee Manual*, Soundwich will not offer or take receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of Soundwich's business, even in areas where it may be tolerated.
 - (b) Soundwich strictly adheres to all local and applicable U.S. laws and regulations, including the Foreign Corrupt Practices Act, and requires its Suppliers to act in a similar manner.
 - (c) Soundwich expects business decisions to be made in the best interest of Soundwich. Any situation that creates or appears to create a conflict between personal interests and the interests of Soundwich must be avoided.
- (5) **Suppliers.** Soundwich expects its Suppliers to introduce and implement equivalent principles in their own companies and their own supply chains.
 - (a) Suppliers should train their employees regularly on these principles, and they must incorporate them as a basis for relations with Soundwich.
 - (b) Suppliers must comply with all applicable laws and regulations, which include national and local laws, rules, codes and regulations as well as applicable treaties. Soundwich strongly encourages any Supplier who feels pressured to violate the law or any provision of this document by a Soundwich employee to contact Soundwich's Human Resources Manager immediately at (216) 386-4047.