



## CODE OF CONDUCT FOR BUSINESS RELATIONSHIPS

### I. Introduction

This Code of Conduct for Business Relationships (CoCBR) serves the purpose of ensuring that Sticks 'n' Sushi's Business Relationships, including suppliers, partners and guests, demonstrate responsible business conduct in relation to managing risks of actual and potential adverse impacts in relation to internationally agreed principles on human rights (including labour rights), the environment, and anti-corruption.

The areas covered by this CoCBR are reflected by the UN Global Compact. The requirement to manage risks of actual and potential adverse impacts in the areas of human rights, the environment, and anti-corruption, is aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD).

Meeting the minimum standard for responsible business conduct as defined by the UNGPs/OECD is distinct from legal compliance; Business Relationships are always expected to comply with national laws, where they operate. Sticks 'n' Sushi reserves the right to levy additional, more specific requirements related to sustainable development, should specific circumstances require such focus.

### II. Management Requirements

Sticks 'n' Sushi expects its Business Relationships to develop and implement a management system that is fully aligned with the globally agreed minimum standard for responsible business conduct (UNGPs/OECD).

#### II.I. Scope

The required management system shall, at a minimum, address adverse impacts on the human rights stated in the International Bill of Human Rights, including the core labour rights from the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work; significant adverse impacts on the external environment in relation to the areas addressed by the Rio Declaration on Environment and Development, including the climate as reflected in the Paris Agreement; and adverse impacts on anti-corruption, as related to the scope outlined by the United Nations Convention against Corruption.

This includes the following actions:

#### II.II. Adopt a Policy Statement

The Policy Statement of our Business Relationships shall:

- be approved at the most senior level of the company.
- be informed by information and guidelines from the UNGPs and OECD.
- stipulate the company's expectations of employees and its business relationships.
- be publicly available and communicated both internally and externally; and
- be embedded in all other operational policies and procedures throughout the company.

#### II.III. Establish and Maintain a Due Diligence Process

Business Relationships shall establish a process that allows for regular assessments of risks of actual and potential adverse impacts on the Scope, confer II.I above. Business relationships shall act to prevent or mitigate the actual or potential adverse impacts identified, and the actions shall be tracked to ensure effectiveness.



Business Relationships are expected to communicate about this process by reporting findings, actions taken, and ongoing status to relevant stakeholders, including Sticks 'n' Sushi.

#### **II.IV. Provide for access to remedy**

Where Business Relationships identify that they cause or contribute to actual adverse impacts in relation to the Scope, Business Relationship must provide for access to remedy through legitimate processes (grievance mechanisms) for those affected. Notification of relevant authorities may be necessary in relation to significant impacts in the areas of the environment and anti-corruption. If Business Relationships are linked to actual severe adverse impacts, but do not cause or contribute to them, Business Relationships must use or build leverage to encourage the causing or contributing entity to address the impacts and prevent or mitigate reoccurrence.

#### **III. Implementation**

Sticks 'n' Sushi implements the requirements outlined in this Code of Conduct and is prepared to share information or documentation with its Business Relationships.

This CoCBB applies to Sticks 'n' Sushi's first-tier Business Relationships. Sticks 'n' Sushi's first-tier Business Relationships shall expect their first-tier business relationships to have similar and adequate processes in place to manage adverse impacts on the Scope. This includes making such business relationships aware of the minimum standard for responsible business conduct as outlined by UNGPs/OECD and requiring that such business relationships meet the standard. If severe adverse impacts are identified in Business Relationships' value chains, Business Relationship must use or build leverage to make the causing or contributing entity(ies) adequately address such impacts and undertake reasonable efforts to ensure that such entity(ies) operate in accordance with the minimum standard.

Business Relationships must maintain appropriate records to demonstrate compliance with the requirements of this CoCBB. Appropriate records include: Policy statement(s), documentation of due diligence processes, including operational-level impact assessments and transparent records on tracking effectiveness of specific actions, and documented grievance mechanisms.

This CoCBB should form a foundation for the collaboration between Sticks 'n' Sushi and our Business Relationships to pursue continuous improvements in managing adverse impacts on the Scope. Should Business Relationships not have implemented a management system in alignment with this CoCBB at the time of agreement/contract signing, an implementation plan should be developed and, if required, presented to Sticks 'n' Sushi. Sticks 'n' Sushi expects Business Relationships at any time to be able to declare their stage of implementation in relation to the requirements contained in this CoCBB.

If Sticks 'n' Sushi's Business Relationships cause, contribute to, or are linked to *severe impacts* on the Scope, Business Relationships shall notify Sticks 'n' Sushi immediately. The notification shall include an account of Business Relationships' actions to end the severe impacts and to prevent or mitigate their re-occurrence. If Business Relationships neglect to notify Sticks 'n' Sushi of and address severe impacts, or if they demonstrate a lack of willingness to meet the international minimum standard, Sticks 'n' Sushi reserves the right to end the business relationship immediately.