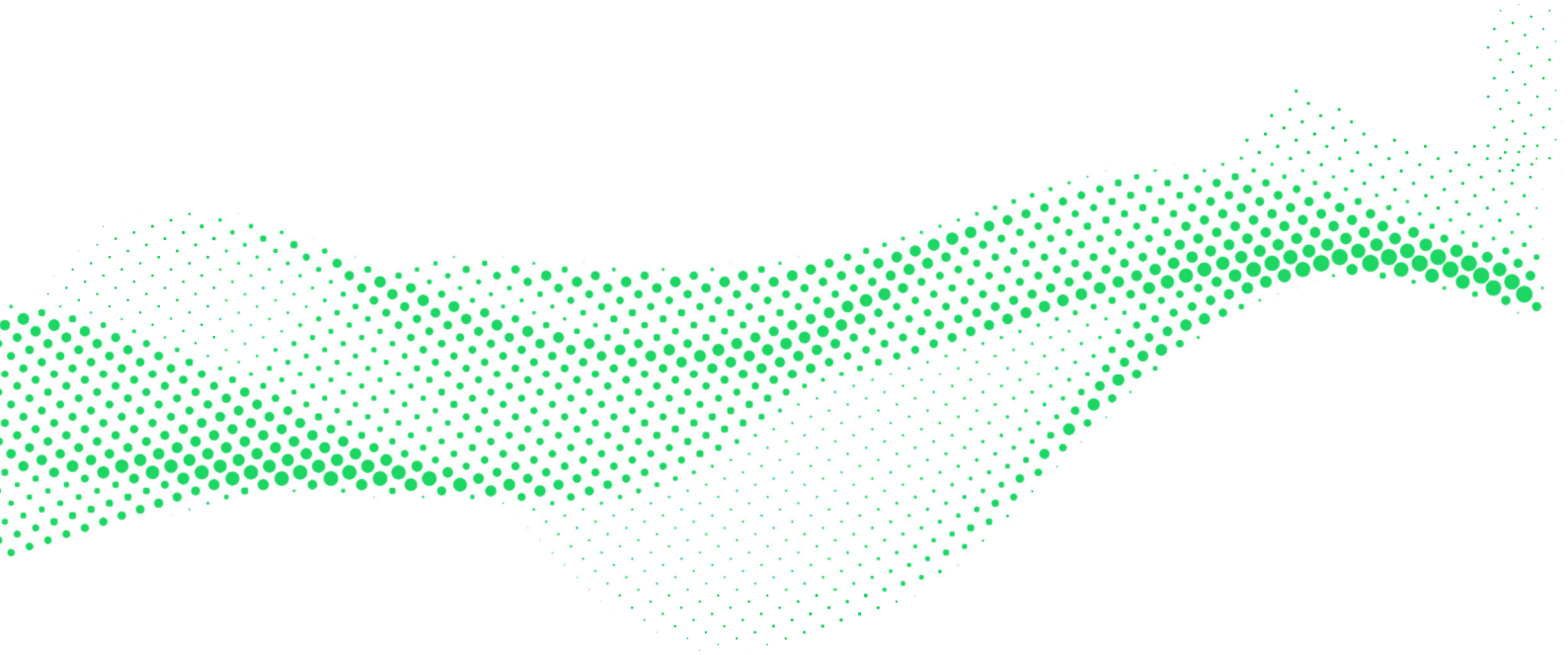


# Salt Mobile SA

## Responsible Procurement Policy



## Document Version

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## Purpose

The Salt Responsible Procurement Policy ("this Policy") illustrates how we shall integrate our Values and the commitments set in our Social Responsibility and Sustainability Policy into our procurement processes, in order to attain best value for money in the acquisition of goods and services for Salt in a manner that is environmentally, ethically, socially and economically responsible.

The decisions that we take and the activities that we perform in our procurement processes shall be undertaken within a clear governance mechanism and guided by the below commitments that are defined more in details in our Social Responsibility and Sustainability Policy:

**Environmental sustainability:** We strive to source and procure goods and services in ways that aim to minimise potential impacts on the environment and biodiversity throughout their lifecycle.

**Ethical sourcing:** We seek to apply a risk-based due diligence approach to identify and mitigate potential adverse impacts on human rights and labour practices across our supply chain.

**Governance:** We endeavour to promote fair operating practices, address consumer-related concerns, and support efforts to prevent corruption, bribery and violence.

## Scope

The terms "we", "our" or "Salt" are used throughout this Policy to cover all of the below entities:

- Salt Mobile SA (Salt)
- Salt (Liechtenstein) AG
- Salt Services SA (Portugal)
- Matterhorn Telecom SA<sup>1</sup>
- Matterhorn Telecom Holding SA<sup>2</sup>

## Salt Commitments to Responsible Procurement

At Salt, we acknowledge that as a business enterprise we have the responsibility to respect human rights and the environment wherever we operate and that it is our duty to support the elimination of corruption and financial crime, both of which are major obstacles to sustainable development.

To this effect, we commit to conduct our procurement activities in strict compliance with applicable laws and under the umbrella of the Universal Declaration of Human Rights<sup>3</sup>, the OECD Anti-Bribery Convention<sup>4</sup>, the International Labour Organisation Conventions and in particular the Conventions n° 138 and 182<sup>5</sup> with regards to the ban on child labour and forced or compulsory labour) and other internationally recognised human rights standards such as the UN Guiding Principles on Business and Human Rights<sup>6</sup>.

We also commit to maintain policies and procedures designed to ensure compliance on a continuous manner with applicable economic sanctions in the US, the UK, the EU and Switzerland, export control laws and

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<sup>1</sup> Parent company of Salt Mobile SA

<sup>2</sup> Parent company of Salt Mobile SA

<sup>3</sup> <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

<sup>4</sup> <https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/fighting-foreign-bribery/Convention%20and%20commentaries%20booklet%202024.pdf>

<sup>5</sup> <https://www.ilo.org/international-programme-elimination-child-labour-ipecc/what-child-labour/ilo-conventions-child-labour#:~:text=The%20two%20ILO%20Conventions%20on%20child%20labour%20are,of%20Child%20Labour.%20These%20Conventions%20are%20%E2%80%9Cfundamental%E2%80%9D%20Conventions.>

<sup>6</sup> [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf)

regulations.

In an ever-globalised world where supply chains play a major role to profitable business, ethical business can only be reached through active involvement of all actors along the supply chain; thanks to our position in the supply chain as a downstream company, we strive to make a positive difference and commit to cease, prevent, mitigate adverse impacts on social responsibility and sustainability issues or exercise our influence against those adverse impacts.

## Integration into the Salt Governance System

This Policy is aligned and shall be read in conjunction with other Salt policies and regulations such as the Salt Social Responsibility and Sustainability Policy, the Salt Code of Ethics, the Salt Signature Policy, the Salt Risk Policy, the Salt Supplier Code of Conduct.

## Responsibilities

As the highest managerial organ of the company, the Salt Mobile SA Board of Directors issues the required directives and sets the overall strategies for the company; in the performance of these duties, it has adopted the Salt Social Responsibility and Sustainability Policy that lays down Salt Environment, Social and Governance (hereinafter ESG) commitments.

With this Policy, the Salt Management Board ensures the integration of these ESG commitments into our supply chain; the Salt Management Board's decisions and actions related to the supply chain shall be governed by the principles of this Policy.

The Procurement Department is expected to implement a structured procurement approach, particularly for significant, high-value and high-volume purchases. Where appropriate, this should include a Request for Proposal (RFP) process that considers environmental and social considerations. Supplier selection and evaluation should, when possible, include criteria related to social responsibility and sustainability. In cases of major deviations from established processes or when critical risks are identified during supplier assessments, the Procurement Department should escalate the matter to the appropriate members of the Management Board and, when necessary, to designated members of the Board of Directors.

The Procurement Department shall promote awareness of this Policy among all individuals involved in procurement activities at Salt. Supplier Selection and Evaluation Process

Salt seeks to identify and select suppliers not only based on traditional criteria such as cost, quality, and product specifications, but also, when relevant, by considering their ethical, social, and environmental performance and commitments. Various tools and relevant assessment methods may be used to help evaluate these aspects for both potential and existing suppliers. Strategic suppliers in particular shall be selected and monitored through a risk-based due diligence process. Supplier selection shall be performed with integrity and objectiveness and always in line with the Salt Code of Ethics.

## Due Diligence

### Principle

Sustainability risk assessment related to procurement activities is embedded into Salt's risk management system and is an integral and fundamental part of business-decision making, with the aim to identify the actual and potential adverse sustainability and human rights impacts of procurement decisions and activities, including exclusion criteria that may be applied to a supplier or contract.

In case we have founded suspicions of a material adverse impact in our supply chain, we conduct due

diligence assessments according to the UN Guiding Principles on Business and Human Rights (UNGPs). We will stay updated and aware of early risk warnings issues by proactively informing ourselves through relevant canals (industry grievance mechanisms – including our own, notation platforms, independent media, NGOs, etc.)

We shall perform our risk assessments and complete the respective mitigation measures based on an array of different instruments and feedback from internal and external stakeholders, including:

- Information provided by NGOs, academic institutions, government bodies, and civil society;
- Independent media sources;
- Declarations and guarantees from suppliers and third parties across our supply chain;
- Application of recognised norms and certification standards;
- Remote or on-site audits, conducted by Salt, or on their behalf by a designated appropriate third-party auditor.

## Human Rights and Child Labour Due Diligence

Human rights are rights inherent to all human beings, without discrimination. They are fundamental human rights to be universally protected and are internationally recognised through the 1948 Universal Declaration of Human Rights.

The Convention on the Rights of the Child<sup>7</sup> prohibits child labour<sup>8</sup>; it is the most widely ratified human rights treaty in history, yet child labour is prevalent in many parts of the world, especially in the poorer and conflict-affected regions.

Child labour is often invisible, as it happens mainly in the higher tier of the supply chain. Key risks of child labour for the ICT sector – to which Salt belongs – have however been identified<sup>9</sup> at all levels of the supply chain; child labour due diligence and response is thus an important part of our supplier sustainability evaluations.

We conduct our child labour due diligence according to the 6-step iterative process recommended by the United Nations Global Compact<sup>10</sup>, the world's largest corporate sustainability initiative; the described due diligence steps are aligned with the UN Guiding Principles on Business and Human Rights (UNGPs).

## Supplier Code of Conduct

At Salt, we value partnerships with suppliers who align with our vision and values. We expect our suppliers to actively uphold and demonstrate commitment to the following principles:

- Human Rights,
- Labour Practices,
- Environment,
- Ethical Business Practices,
- Confidentiality, Data Protection and Intellectual Property.

Salt may evaluate suppliers against the requirements of our Supplier Code of Conduct through a variety of assessment methods. When appropriate, we may request evidence of compliance and conduct audits, either

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<sup>7</sup> <https://www.unicef.org/child-rights-convention>

<sup>8</sup> *In line with applicable law, Salt defines child labour as the work of persons under the age of 18 that qualifies as one of the worst forms of child labour, according to ILO Convention no. 182 (among others, child slavery and work involving children in illegal or potentially harmful activities). In addition, in countries that have ratified and implemented ILO Convention no. 138, any form of child labour prohibited under local law qualifies as child labour. In countries that have not ratified ILO Convention no. 138, any work performed by children under the age of 15 or who are in compulsory education, and any work performed by persons under the age of 18 that is likely to be dangerous to the life, health, or morals of juveniles, is also considered to be child labour*

<sup>9</sup> <https://www.childrensrighsatlas.org/industry-analysis/ict/key-risks>

<sup>10</sup> <https://unglobalcompact.org/>

remotely or on-site at the supplier's premises. If non-compliance is identified, we will aim to support the supplier in identifying appropriate remediation measures. However, if a supplier is unwilling to cooperate or address the issue, we reserve the right to take more stringent actions, including terminating the contractual relationship.

## Transparency and Traceability

We are committed to fostering greater transparency in our procurement decisions and activities that affect sustainability. We also encourage our suppliers to adopt transparent practices, recognizing that transparency forms the foundation for meaningful stakeholder dialogue and collaboration.

To support this, we aim to develop clear, comprehensive, and transparent reporting, in particular with regards to the adequacy of our risk mitigation measures, progress toward our sustainability goals, and the outcomes of our monitoring efforts.

The traceability of the goods and services we procure matters, especially when there is a well-founded suspicion of significant adverse impacts within our supply chain. In such a case, details will be requested from suppliers.

In addition, we seek to continuously expand our understanding of the direct and indirect impacts of our sourcing activities and use this knowledge to guide our procurement decisions in a more responsible and sustainable direction. Our Supplier Code of Conduct also requires our business partners to actively support our efforts to improve transparency and traceability across the products and services they provide.

## Training and Awareness

This Policy is actively communicated to all employees involved in the procurement of goods and services.

We aim to ensure that the principles of responsible procurement outlined in this Policy are understood and embraced by providing training and support to relevant internal teams. We also welcome feedback and suggestions from all stakeholders to help us continuously improve this Policy at [procurement@salt.ch](mailto:procurement@salt.ch).

## Grievance Mechanism

Any misconduct or breach to this Responsible Procurement Policy can be addressed by sending an email to: [whistleblowing@salt.ch](mailto:whistleblowing@salt.ch) or in writing to: Whistleblowing, Salt Mobile SA, Avenue de Malley 2, 1008 Prilly, Switzerland.

Salt's grievance channel is available to all employees who wish to report any potential breach of this Responsible Procurement Policy in a safe, confidential, and anonymous manner. Any reported concerns will be promptly investigated, with diligence and in a timely manner.