

October 8, 2018

Dear Valued Senneca Holdings Supplier,

Our company is committed to sustainability. This includes respect for universally recognized principles on human rights including labor rights, the environment, and anti-corruption.

Therefore, we seek to ensure that our own company and our suppliers operate in accordance with the requirements outlined in our Supplier Code of Conduct.

The enclosed supplier self-assessment questionnaire is designed to give us a better understanding of how your company manages its impacts on human rights including labor rights, environmental and anti-corruption principles.

The questions included in the questionnaire therefore reflect the requirements outlined in our Supplier Code of Conduct.

We kindly ask you to fill out the questionnaire and return a filled-in version to us. Please use the "Please elaborate" box if you find that a simple "yes/no" answer is not enough, or if a statement containing more than one aspect requires differentiated answers. You are also welcome to provide further explanations in a separate document. This will help us to better assess your CSR performance.

When we ask whether or not you have identified any adverse impacts on human rights, the environment or anti-corruption, please remember to take both potential and actual impacts into account. Also, please note that an adverse impact on human rights, for instance, occurs when an action removes or reduces the ability of an individual to enjoy his or her human rights. This means that you can have adverse impacts on human rights even if your activities are in compliance with relevant laws. We provide company specific examples in connection to each right to give you a better idea of what types of impacts you may want to consider.

We kindly ask you to read the Supplier Code of Conduct carefully before answering this questionnaire. The Supplier Code of Conduct will further guide your understanding of the context and content of the questions.

If you have any questions regarding our Code of Conduct or the questionnaire, please do not hesitate to contact us.

Kind regards,



Dave Vanderford
Vice President, Global Supply Chain

Supplier Self-Assessment Questionnaire

Section I: Company Information	
1. Company Name	
2. Address	
3. Telephone	
4. Company Web page (if applicable)	
5. Answered by (name, job title, and e-mail)	
6. Completion Date	

Section II: Legal Compliance				
	Comply	Not Comply	Not Applicable	Please elaborate (where relevant)
1. The supplier complies with all laws, regulations, administrative practices and other applicable standards (e.g. collective bargaining agreements or other Codes of Conduct) in the countries in which it operates.				

Section III: Human Rights Including Labor Rights				
	Yes	No	In progress	Please elaborate (where relevant)
1. Does your company have a policy statement concerning human rights including labor rights?				
1a. If yes, is the policy statement based on international principles, i.e. the International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for multinational enterprises?				
2. Has your company established a process of continuous due diligence in relation to its impacts on human rights including labor rights?				
2a. If yes:				
Does the process include identifying both actual and potential adverse human rights impacts on a regular basis?				
Does the process include preventing and mitigating identified potential adverse human rights impacts?				
Does the process include accounting for, i.e. tracking and communicating on, how you address potential and actual adverse human rights impacts?				
3. Does your company have a management system e.g. SA8000 or OHSAS 18001 certification?				

	Yes	No	<i>If yes, please describe the potential or actual impact and actions taken to address (prevent/mitigate) the impact</i>	Short examples of adverse impacts on each human right
3.1 Have you identified any potential or actual adverse impacts in relation to the Right to self-determination (indigenous people's rights) ?				Company X buys a piece of land despite knowing that a group of indigenous peoples may have claims stemming from customary use of the same land. Company X takes advantage of the fact that this group of indigenous peoples are very poorly connected politically and lack titles to the land. It ignores their protests and finally asks the police to evict the persons living on the land.
3.2. Have you identified any potential or actual adverse impacts in relation to the Right to non-discrimination ? <i>Recognized and prohibited grounds for discrimination under international human rights law include gender, age, nationality, ethnicity, race, color, creed, caste, language, mental or physical disability, organizational membership, opinion, health status (including HIV or AIDS status), sexual orientation, marital status, birth, or civic, social, or political characteristics of the employee.</i>				Company X begins recruitment for an additional staff. Several qualified and suitable candidates apply for the position, including ethnic minorities. The company decides not to interview candidates whose minority background is visible, because in the past customers have complained about being served by visible minorities. Workplace discrimination can also be reflected in company policies, procedures and practices concerning: <ul style="list-style-type: none"> • Hiring • Wages • Promotion • Access to training • Disciplinary procedures • Retirement and termination processes
3.3. Have you identified any potential or actual adverse impacts in relation to the Right to work (training, contract, termination) ?				Company X refuses to use contracts or letters of employment with newly hired employees
3.4. Have you identified any potential or actual adverse impacts in relation to the Right to enjoy just and favorable conditions of work including equal pay for equal work, a living wage (minimum wage, safe and healthy working conditions, equal opportunity for everyone to be promoted and rest, leisure and paid holidays)?				Company X recruits a new employee who is an immigrant from an emerging economy country. Due to his national origin he is paid less than his colleagues, as management believes his salary is still well beyond what he would have made in his home country.
3.5. Have you identified any potential or actual adverse impacts in relation to the Right to form and join trade unions and the right to strike ?				A number of employees meet outside work hours to take steps to join a trade union. Company X hires a lawyer with the deliberate intention of intimidating the employees in the hope that they will not proceed with their plans to join a union.
3.6. Have you identified any potential or actual adverse impacts in relation to the Right to social security, including social insurance ?				Company X keeps employees on as casual workers even though the employees are working on a permanent basis and therefore are entitled to permanent contracts and social security/insurance.

	Yes	No	<i>If yes, please describe the potential or actual impact and actions taken to address (prevent/mitigate) the impact</i>	Short examples of adverse impacts on each human right
3.7. Have you identified any potential or actual adverse impacts in relation to the Right to a family life (including protection of mothers before and after childbirth and children’s and young people’s protection from exploitation (no child labor))?				Company X buys promotional items, such as pens and lighters with the company logo from a rather large supplier. When visiting the supplier to negotiate price and quality of the order the company notices several young children that seem to be assembling small parts. As the company is a small company in comparison with the supplier, the company ignores what they see and places the order.
3.8. Have you identified any potential or actual adverse impacts in relation to the Right to adequate standard of living (including adequate food and its fair distribution, adequate clothing, adequate housing and water and sanitation)?				Company X provides dormitories for migrant employees during high season. To keep costs down, dormitories are overcrowded, lack sanitation and are rarely cleaned. Employees complain since they have nowhere else to sleep.
3.9. Have you identified any potential or actual adverse impacts in relation to the Right to health?				Company X uses chemicals when coloring their products with a negative health impact. The employees who work with the chemicals are not provided with personal protection equipment by the company.
3.10. Have you identified any potential or actual adverse impacts in relation to the Right to education?				Company X finds that two employees are voicing too many ideas about employees’ rights after they enrolled in a training program offered by the local trade union branch outside business hours. Company X informs the employees that they will encounter “difficulties” if they continue attending the classes.
3.11. Have you identified any potential or actual adverse impacts in relation to the Right to take part in cultural life, to benefit from scientific progress, to material gains from inventions and moral rights of authors (including protection of copyrights)?				Company X advises building projects on a global scale. They are advising a large customer on the construction of a large plant. As a result of the construction, the local population will be prevented from visiting a cultural site of big importance to them. The company learns about the issue, but feels it is none of their business and decides to do nothing.
3.12. Have you identified any potential or actual adverse impacts in relation to the Right to life?				The owner of Company X delays repair of a company van due to economic difficulties. As a result, the brakes fail, and a person is killed.
3.13. Have you identified any potential or actual adverse impacts in relation to the Right not to be subjected to torture, cruel, inhumane and/or degrading treatment or punishment (including free consent to medical or scientific experimentation)?				Company X’s office manager systematically harasses her employees, e.g. by calling them derogatory names whenever she is dissatisfied with their work-related performance.

	Yes	No	<i>If yes, please describe the potential or actual impact and actions taken to address (prevent/mitigate) the impact</i>	Short examples of adverse impacts on each human right
3.14. Have you identified any potential or actual adverse impacts in relation to the Right not to be subjected to slavery, servitude or forced labor?				Company X employs unskilled workers. The company seeks out immigrants that are willing to work under the poor conditions and for a low salary. Due to the high turnover of workers the company decides to keep their passports and introduce a high 'consultation fee' to retrieve the passport.
3.15. Have you identified any potential or actual adverse impacts in relation to the Right to liberty and security of person?				Some workers in company X are assaulted whilst at work. The security personnel apprehended the offenders. The security personnel lock the offenders in a room against their will until lunchtime the following day, where they are handed over to the police. Company X complimented security for dealing with the situation without disturbance for the customers - causing a possible reduction in profits.
3.16. Have you identified any potential or actual adverse impacts in relation to the Right of detained persons to human treatment?				Company X runs a prison. Due to cuts in budgets and an increase in convicted criminals Company X decides to establish bunker beds and have two inmates share a prison cell that was designed to accommodate one person only.
3.17. Have you identified any potential or actual adverse impacts in relation to the Right not to be subjected to imprisonment for inability to fulfill a contract?				Company X operates in a country where imprisonment for non-fulfilment of contracts is part of the penal code. By coincidence Company X becomes aware that an employee is heavily indebted. The employee cannot repay the debt or interests in a foreseeable future. Company X has considered to lay-off the employee anyway and sees a possibility to save costs. Company X notifies government authorities resulting in the imprisonment of the employee; thus, providing for a just cause for immediate termination.
3.18. Have you identified any potential or actual adverse impacts in relation to the Right to freedom of movement?				Company X has a supplier in a remote rural district. When visiting the supplier, the company learns that the supplier forbids the workers to leave the work place after working hours, because of its experience that some workers would come back too late in evenings to be fit for work the next morning.

	Yes	No	<i>If yes, please describe the potential or actual impact and actions taken to address (prevent/mitigate) the impact</i>	Short examples of adverse impacts on each human right
3.19. Have you identified any potential or actual adverse impacts in relation to the Right of aliens to due process when facing expulsion (seeking asylum)?				Company X is a security company that is hired by its government to manage a detention centre for immigrants. Management of the detention centre often do not pay any real consideration to the cases put forward by asylum seekers, and usually sends asylum seekers back to their home country within 12 hours.
3.20. Have you identified any potential or actual adverse impacts in relation to the Right to a fair trial?				Company X uses a distributor for its products. During a dinner the CEO of the distributor brags that he 'convinced' a judge to dismiss a lawsuit from a former employee.
3.21. Have you identified any potential or actual adverse impacts in relation to the Right to be free from retroactive criminal law?				Company X is assisting the prosecutor in a case at the national courts. The accused is a former employee of a big client and the person was made redundant based on the accusations. Company X is very aware that the case is based on recent legal changes criminalizing the actions of the accused; actions that were not criminalized under regulation in force at the time of action.
3.22. Have you identified any potential or actual adverse impacts in relation to the Right to recognition as a person before the law?				Company X operates in a country characterized by great ethnic division and suppression of minorities by the majority in power. Company X has knowingly assisted customers from minority groups in depositing assets where the customers were subsequently denied access to the funds claiming that the specific group members were not allowed to own assets.
3.23. Have you identified any potential or actual adverse impacts in relation to the Right to privacy?				As a personal favor to a friend from another business the managing director of Company X passes on personal information on selected customers without their prior consent.
3.24. Have you identified any potential or actual adverse impacts in relation to the Right to freedom of thought, conscience and religion?				The owner of Company X notices that some employees wear religious symbols and practice their faith whenever they have breaks. As an atheist he is provoked by their practices. Even though the practices do not pose any risk to the health and safety of others, or interfere with the employees' ability to perform their duties, he asks them to stop.

	Yes	No	<i>If yes, please describe the potential or actual impact and actions taken to address (prevent/mitigate) the impact</i>	Short examples of adverse impacts on each human right
3.25. Have you identified any potential or actual adverse impacts in relation to the Right to freedom of opinion and expression (including freedom of information)?				Company X sells ICT solutions to public authorities. The company is aware that some public clients use the products to track and persecute individuals that disagree with government policies. The owner reasons that a small company cannot influence such use and that other businesses would take over the profitable business if his company refrains.
3.26. Have you identified any potential or actual adverse impacts in relation to the Right to freedom from war propaganda, and freedom from incitement of racial, religious or national hatred?				Some of the employees of Company X have been writing emails with hateful comments about a local minority group. The emails were shared with colleagues. The management is aware of this, but chooses to neglect it, assuming it to be “not a big deal” and not to be a company matter.
3.27. Have you identified any potential or actual adverse impacts in relation to the Right to freedom of peaceful assembly?				The local union organizes a peaceful and legally authorized demonstration against the working conditions in Company X outside its premises. The company gets upset and hires a security company to disperse the demonstrators.
3.28. Have you identified any potential or actual adverse impacts in relation to the Right to freedom of association?				A few employees meet outside work hours to take steps to join a trade union. Company X hires a lawyer with the deliberate intention of intimidating the employees in the hope that they will not proceed with their plans to join a union.
3.29. Have you identified any potential or actual adverse impacts in relation to the Right to protection of the family and the right to marry?				Company X strongly encourages an employee to postpone her wedding for one year to avoid unnecessary distractions during a busy period. She is told that there might not be room for her in the company if she carries out the wedding plans.
3.30. Have you identified any potential or actual adverse impacts in relation to the Right to protection of the child and the right to nationality?				Company X operates in a country where sex trade with children is a known risk. Even though the company is aware of the risk, it decides to turn a blind eye to the fact that business partners visit minors on a regular basis.
3.31. Have you identified any potential or actual adverse impacts in relation to the Right to participate in public affairs?				An employee of Company X is running for office at a local election. The managing director of the same company supports another party and starts questioning the employee’s professional competences and taking away some of his responsibilities.

	Yes	No	<i>If yes, please describe the potential or actual impact and actions taken to address (prevent/mitigate) the impact</i>	Short examples of adverse impacts on each human right
3.32. Have you identified any potential or actual adverse impacts in relation to the Right to equality before the law, equal protection of the law, and rights of non-discrimination?				Company X takes advantage of the fact that migrant workers are not equally protected under national labor laws by offering them working conditions that are below national standards.
3.33. Have you identified any potential or actual adverse impacts in relation to the Right of minorities (culture, religious practice and language)?				Company X mandates employees to speak only English in the workplace even where speaking other languages would not affect the work at hand or adversely impact workplace health, safety or security. By implementing only one official company language the management of Company X wishes to create a common understanding between all employees. However, employees with minority background are kept from speaking their own languages.

	Yes	No	In progress	Please elaborate (where relevant)
3a. <i>If you have answered 'yes' to any questions between 3.1. - 3.33:</i> Can you demonstrate that you prevent and mitigate the potential and/or actual adverse impacts identified?				
3b. <i>If you have answered 'yes' to any questions between 3.1. - 3.33:</i> Can you demonstrate that you track the effectiveness of your response to the potential and/or actual adverse impacts identified?				
4. Has your company established remediation processes? And/or does your company participate in remediation processes?				
4a. <i>If you have identified any actual adverse impacts:</i> Can you demonstrate that you have provided remedy to the victims?				

Section IV: Environment

	Yes	No	In Progress	Please elaborate (where relevant)
1. Does your company have a policy statement concerning the environment?				
1a. If yes, is the policy statement based on international principles, e.g. the Rio Declaration on Environment and Development, Agenda 21 and the OECD Guidelines for multinational enterprises?				
2. Has your company established a process of continuous due diligence in relation to its impacts on the environment?				

	Yes	No	In Progress	Please elaborate (where relevant)
2a. If yes:				
Does the process include identifying both actual and potential adverse environmental impacts on a regular basis?				
Does the process include a process for preventing and mitigating identified potential adverse environmental impacts?				
Does the process include accounting for, i.e. tracking and communicating on, how you address potential and actual adverse environmental impacts?				
3. Does your company have an environmental management system e.g. EMAS registration or ISO 14001 certification?				

Have you identified any potential or actual adverse impacts in relation to the environmental principles listed below:	Yes	No	<i>If yes, please describe the potential or actual impact</i>	<i>If yes, please describe actions taken to address (prevent/mitigate) the impact</i>
<u>4. Legal aspects:</u>				
4.1 Ensuring Legal compliance with all regulated environmental issues related to waste management, air pollution, wastewater, soil contamination, and biodiversity?				
4.2 Maintaining and updating on a regular basis a list of the relevant environmental legislation to comply with?				
4.3 Assuring compliance with prohibited chemicals list (e.g. for agrichemicals from World Health Organization, WHO)?				
4.4 Assuring compliance with international environmental conventions and protocols, e.g. the Montreal Protocol about ozone depleting substances or Protocol on Persistent Organic Pollutants (POP)?				
4.5 Keeping record of all pollution incidents and reporting these to relevant authorities as required by applicable permits and legislation?				
4.6 Providing for the necessary organization, training of employees, awareness raising, operational control and monitoring to assure and maintain legal compliance?				
<u>5. Pollution prevention and cleaner production:</u>				
5.1 Supporting a precautionary approach to environmental challenges, which involves a systematic risk assessment (hazard identification, hazard characterization, appraisal of exposure and risk characterization), risk management and risk communication?				

Have you identified any potential or actual adverse impacts in relation to the environmental principles listed below:	Yes	No	<i>If yes, please describe the potential or actual impact</i>	<i>If yes, please describe actions taken to address (prevent/mitigate) the impact</i>
5.2 Supporting activities that involve waste reduction and resource optimization from suppliers' operations?				
5.3 Supporting activities that promote green procurement of more eco-efficient products?				
5.4 Protecting the environment by using environmentally sound technologies that are less polluting, and use all resources in an efficient way?				
5.5 Striving for integration of environmental attention into all elements of business planning and decision-making?				
5.6 fostering openness and dialogue with employees and the public as part of the company's approach to environmental responsibility?				
<u>6. Environmental aspects:</u>				
6.1 the Use of scarce natural resources, energy and water?				
6.2 the Emissions to air and releases to water?				
6.3 the Noise, odor and dust emission?				
6.4 the Potential and actual contamination of the soil?				
6.5 Waste management of hazardous and non-hazardous waste?				
6.6 Product issues (environmental aspects of design, packaging, transport, use and recycling/disposal)?				
<u>7. Emergency preparedness:</u>				
7.1. Establishing and maintaining emergency procedures?				
7.2. Having a site emergency plan in place with detailed guidelines/training for major incident response, to effectively prevent and address all health emergencies and industrial accidents that can affect the surrounding community or have an adverse impact on the environment?				
7.3 Ensuring that the Emergency response plan is communicated to local authorities, emergency services and potentially affected local communities, as required?				
<u>8. Management of chemical substances:</u>				
8.1 Maintaining an inventory of hazardous substances used in the operation and stored, and assessing substitution options toward more environmentally friendly substances?				

Have you identified any potential or actual adverse impacts in relation to the environmental principles listed below:	Yes	No	If yes, please describe the potential or actual impact	If yes, please describe actions taken to address (prevent/mitigate) the impact
8.2 Ensuring that access to relevant up-to-date Material Safety Data Sheets (MSDS) for chemical substances?				
8.3 Assuring safety procedures/controls in place for hazardous substances?				
8.4 Assuring minimizing the potential contamination of air, fresh water, soil and groundwater from chemical substances?				

	Yes	No	In progress	Please elaborate (where relevant)
9.1 If you have answered 'yes' to any questions between 4.1 -8.4: Can you demonstrate that you prevent and mitigate the potential and/or actual adverse impacts identified?				
9.2 If you have answered 'yes' to any questions between 4.1 -8.4: Can you demonstrate that you track the effectiveness of your response to the potential and/or actual adverse impacts identified?				
10. Has your company established remediation processes? And/or does your company participate in remediation processes?				
10.1 If you have identified any actual adverse impacts: Can you demonstrate that you have remediated the situation?				

Section V: Anti-Corruption				
	Yes	No	In Progress	Please elaborate (where relevant)
1. Does your company have a policy statement concerning anti-corruption?				
1a. If yes, is the policy statement based on international principles, i.e. the United Nations Convention against Corruption?				
2. Has your company established a process of continuous due diligence to counter corrupt practices?				
2a. If yes:				
Does the process include identifying actual and potential corrupt practices on a regular basis?				
Does the process include a process for preventing and mitigating identified potential corrupt practices?				
Does the process include accounting for, i.e. tracking and communicating on, how you address potential and actual corrupt practices?				

Have you identified any potential or actual adverse impacts in relation to	Yes	No	If yes, please describe the potential or actual impact	If yes, please describe the actions taken to address (prevent/mitigate) the impact
3.1. the need to document, record and keep income and expenditure data available for periods determined by law, and if not regulated for a minimum of three years?				
3.2. not permitting corruption of public officials or private-to-private corruption, including both 'active' and 'passive' corruption (also referred to at times as 'extortion' or 'solicitation')?				
3.3. not permitting payment of bribes or trading in influence in relation to business partners, government officials or employees; including through the use of intermediaries?				
3.4. not permitting use of facilitation payments, unless you are subject to threats or other coercion?				
3.5. not hiring government employees to do work that conflict in any manner with the former official obligations of that employee?				
3.6. not permitting political contributions, charitable donations and sponsorships in expectation of undue advantages?				
3.7. not offering or accepting excessive gifts, hospitality, entertainment, customer travel and expenses (e.g. above the cumulative value of the equivalent of USD 200 per person/relationship in any twelve-month period, if approved by a senior officer and explicitly recorded in the books of the business, naming the recipient or giver)?				
3.8. abstaining from nepotism and cronyism?				
3.9. not permitting or participating in money laundering?				

	Yes	No	In progress	Please elaborate (where relevant)
4a. If you have answered 'yes' to any questions between 3.1.- 3.9: Can you demonstrate that you prevent and mitigate the potential and/or actual corrupt practices identified?				
4b. If you have answered 'yes' to any questions between 3.1. - 3.9: Can you demonstrate that you track the effectiveness of your response to the potential and/or actual corrupt practices identified?				

	Yes	No	In progress	Please elaborate (where relevant)
5. Has your company established remediation processes? And/or does your company participate in remediation processes?				
5a. <i>If you have identified any actual corrupt practices: Can you demonstrate that you have remediated the situation?</i>				

Section VI: Signature

The supplier hereby confirms that the content and statements in the completed questionnaire give a truthful and accurate description of compliance with Code of Conduct:
