

*Sticks'n'Sushi 2025*

# CODE OF CONDUCT FOR BUSINESS RELATIONSHIPS

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STICKS|N|SUSHI



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The purpose of this document is to support our business relationships to successfully implement the principles and standards set forth by providing specific guidelines that we expect you to follow.

## MESSAGE FROM THE CEO

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Dear valued Business Relationship,

At Sticks'n'Sushi it is our vision to make sustainability a primary value driver. We are generous in the way we serve our guests and care for each other, and we take pride in putting 'we' before 'me'. The sense of collective responsibility is key to our being and essential for driving positive change and mitigating adverse impact.

Our Business Relationships play a vital role in our ability to deliver on our vision and provide value to our stakeholders. We have therefore developed this Code of Conduct for Business Relationships to outline the environmental, social, and ethical requirements we expect you to comply with.

As a valued Business Relationship of Sticks'n'Sushi, I count on your commitment and support to continuously adopt and promote these requirements and go beyond compliance and strive for higher standards of sustainability where possible.

Kind regards,  
Andreas Karlsson, CEO





## INTRODUCTION

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This Code of Conduct for Business Relationships (hereinafter referred to as the Code) serves the purpose of ensuring that Sticks'n'Sushi's Business Relationships, including suppliers and partners, 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 requirement to manage risks of actual and potential adverse impacts is aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD). Sticks'n'Sushi is establishing these systems to manage our impacts and it is part of our responsibility conduct to require all Business Relationships to do the same.

Meeting the international 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. Where the standards in this Code differ from local and national laws as well as international standards, we expect our suppliers to apply the stricter standard.

Finally, the food we serve makes the core of our business. Thus, ensuring product stewardship and sustainable farming and fisheries in our value chain is paramount. Sticks'n'Sushi seeks to contribute to transforming the food system within our sphere of influence to support the European Green Deal to address the challenges posed by climate change, environmental degradation, biodiversity loss and more.

# PRINCIPLES AND STANDARDS

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## ENVIRONMENT

Sticks'n'Sushi expects Business Relationships to integrate systematic considerations that protect the environment and be committed to combat climate change and use natural resources intelligently. Business relationships must develop and implement a management system that is fully aligned with the OECD Guidelines for Multinational Enterprises, which are the globally agreed minimum standard for responsible business conduct. The required management system shall, at a minimum, address 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.

### Business Relationships are expected to:

- Adopt an environmental policy
- Establish and maintain a due diligence process
- Identify operational risks of adverse impacts
- Outline existing and planned actions
- Implement processes to prevent or mitigate actual impacts
- Measure effectiveness
- Provide for remedy in case of actual adverse impacts

## HUMAN RIGHTS

Sticks'n'Sushi expects Business Relationships to respect human rights including labour rights by implementing a management system that follows the procedural requirements set forth in the UN Guiding Principles on Business and Human Rights. 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.

### Business Relationships are expected to:

- Adopt a Human Rights Policy
- Establish and maintain due diligence process
- Identify operational risks of adverse impacts
- Outline existing and planned actions
- Implement processes to prevent or mitigate actual impacts
- Measure effectiveness
- Provide for remedy in case of actual adverse impacts

## ANTI-CORRUPTION

Sticks'n'Sushi expects Business Relationships to conduct their business responsibly without engaging in corruption including extortion, facilitation payment, money laundering, embezzlement and bribery or any type of fraudulent business practice. Business relationships must develop and implement a management system that is fully aligned with the OECD Guidelines for Multinational Enterprises, which are the globally agreed minimum standard for responsible business conduct. The required system shall, at a minimum, address adverse impacts on anti-corruption, as related to the scope outlined by the United Nations Convention against Corruption.

### Business Relationships are expected to:

- Adopt an Anti-Corruption Policy
- Establish and maintain a due diligence process
- Provide for remedy in case of actual adverse impacts
- Prevent any form of receipt or payment, gifts, and/or hospitality for the purpose of obtaining or retaining business or any form of preferential treatment or advantage
- Avoid situations of actual or potential conflict of interest related to any business, financial or private benefit
- Adhere to data privacy laws and comply to contractual requirements on confidentiality and information security

## IMPLEMENTATION

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Implementation of this Code is part of Sticks'n'Sushi's due diligence process established to promote continuous improvement in managing adverse impacts through dialogue and ongoing working relationships. We recognize that our responsibility for social, environmental and economic impacts are linked to the cooperation we have with our Business Relationships. Therefore, we expect our Business Relationships expect their first-tier business relationships to have similar or adequate processes in place to manage adverse impacts.

Business Relationships are expected to communicate about implementation by reporting findings, actions taken, and ongoing status to relevant stakeholders. Business Relationships must contact Sticks'n'Sushi if discovering a connection to negative impacts on human rights, environment or corruption, which is also expected in events of severe legal non-compliance.

In case of non-compliance, the business relationship must submit a corrective action plan to address any specific issues. Sticks'n'Sushi may terminate the agreement with business relationships who repeatedly and knowingly violate the Code and refuse to collaborate with us implementing improvement plans.

We recognize that our Business Relationships may be at different maturity levels with regards to the expectations set out in our Code. Therefore, we also acknowledge that transition can take time. What is important to us is that our partners show commitment towards embedding the main principles and standards of this Code.





# REPORTING CONCERNS

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We expect all Business Relationships to have a reporting system to ensure that affected stakeholders can voice grievances anonymously and without fear of reprisals on any aspects of this Code. All grievances must be investigated in a fair and timely manner.

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 impact and prevent or mitigate reoccurrence.

Sticks'n'Sushi also welcome concerns from any stakeholder, if serious or illegal misconduct is suspected or known.

You may voice your concern through the channel most comfortable, such as Sticks'n'Sushi partner or through our Whistleblower System. The Whistleblower System is anonymous and is administered by an external third party (PWC).

Report a concern – [please visit our Whistleblower System.](#)

# SIGNATURE

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Name (first and last name): \_\_\_\_\_

Job title: \_\_\_\_\_

Company: \_\_\_\_\_

Date (DD-MM-YYYY): \_\_\_\_\_

Signature: \_\_\_\_\_

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By signing this document, you confirm that you will work towards fulfilling the requirements in this Code. If, upon our request, you are not able to provide documentation with respect to fulfilment of the requirements, you confirm your willingness to begin documenting your efforts.



PLEASE ADDRESS ANY INQUIRIES REGARDING THIS CODE TO:  
[sushistainable@sushi.dk](mailto:sushistainable@sushi.dk)



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[sticksnsushi.com](http://sticksnsushi.com)