

# VASTUU GROUP'S CODE OF CONDUCT FOR SUPPLIERS AND PARTNERS

Vastuu Group is committed to responsible business practices and seeks to promote adherence to high ethical standards throughout our procurement and distribution chains. We expect our suppliers and partners (hereinafter collectively referred to as 'suppliers') to share the value of responsibility and to commit to Vastuu Group's Code of Conduct. This Code of Conduct is largely based on the principles of the UN Global Compact and the Sustainable Development Goals, to which Vastuu Group is committed. Together, we can build a more responsible and sustainable future.

**Thank you for committing to our shared code of conduct.**

- 1**      **Laws and regulations**
- 2**      **Human rights and working conditions**
- 3**      **Ethical business operations**
- 4**      **Environment**
- 5**      **Supplier's supply chain**
- 6**      **Monitoring and reporting violations**

# 1 Laws and regulations

Suppliers must comply with applicable laws and regulations, including data protection, information security, competition, environmental, and labour laws.

# 2 Human rights and working conditions

Suppliers must support and respect internationally recognised human rights within their sphere of influence.

## 2.1. Non-discrimination

Suppliers must treat their employees and job applicants equally, without discrimination, and fairly in recruitment, remuneration, career opportunities, and other personnel matters. The provider must provide equal opportunities for all regardless of age, gender, ethnicity, nationality, colour, religion, belief or political opinion, marital status, sexual orientation, gender identity, disability, health, family status or any other personal characteristic.

## 2.2. Prohibition of forced and child labour

Suppliers must adhere to international standards prohibiting the use of forced and child labour, such as those outlined in International Labour Organisation (ILO) conventions.

## 2.3. Working conditions and remuneration

Suppliers must provide safe and healthy working conditions for their employees. Suppliers must ensure that their employees are not subject to harassment, inappropriate comments, bullying, or discriminatory behaviour. Employee compensations and benefits must meet, at least, the local legal requirements, regulations, and applicable collective agreements. Employees must have the right to establish and join trade unions and to negotiate collectively.

## 2.4. Handling complaints

Suppliers must ensure that employees have appropriate mechanisms to raise concerns about compliance with this Code of Conduct. Suppliers must protect employees who report issues in good faith against retaliative actions.

# 3 Ethical business operations

## 3.1. Handling of personal and business data

Suppliers must handle personal and business data in compliance with legal and contractual obligations. Suppliers must secure and protect the data they process and aim for high standards of information security. Suppliers must continually improve their data security management and protections against cyber risks.

Confidential information must be protected from unauthorised disclosure and it must be used solely for its intended purposes. The supplier must ensure that this information is not disclosed to third parties without appropriate authorisation.

## 3.2. Fair competition

Suppliers are expected to be transparent and honest in all their business dealings. Suppliers must compete fairly and comply with competition laws in all activities. Suppliers must adhere to applicable export control laws and international sanctions imposed by entities such as the United Nations, the European Union, or the United States.

Suppliers must respect the intellectual property rights of third parties.

## 3.3. Anti-corruption and bribery

Suppliers must have zero tolerance for bribery and corruption. Suppliers must not allow their employees, executives, or third parties acting on their behalf to promise, offer, pay, give, or accept bribes or other undue advantages.

## 3.4. Conflict of interest

Suppliers must avoid situations that could lead to conflicts of interest and must promptly report potential conflicts to Vastuu Group.



## 4 Environment

Suppliers must identify the environmental impact of their operations and take all reasonable measures to continually improve their environmental protection standards. Suppliers must strive to minimise their carbon footprint, waste generation, energy and water usage, and emissions.

## 5 Supplier's supply chain

Suppliers must take reasonable measures to ensure that their subcontractors adhere to the principles outlined in this Code of Conduct.

## 6 Monitoring and reporting violations

Vastuu Group reserves the right to monitor the adherence of suppliers to this Code of Conduct and to conduct audits to verify compliance. Suppliers must demonstrate compliance with these guidelines upon request and cooperate with Vastuu Group during audits.

Suppliers must report any violations or suspected violations of this Code of Conduct to their designated contact at Vastuu Group. If direct communication with Vastuu Group is not feasible, suppliers can also report anonymously through Vastuu Group's [whistleblowing channel](https://vastuugroup.ilmoituskanava.fi/) (<https://vastuugroup.ilmoituskanava.fi/>). Instructions on how to report misconduct can be found [here](https://www.vastuugroup.fi/ilmoituskanava) (<https://www.vastuugroup.fi/ilmoituskanava>).

