

VERKKOKAUPPA.COM SUPPLIER CODE OF CONDUCT

Verkkokauppa.com Oyj and its Group companies (“**Verkkokauppa.com**”) wish to operate openly and responsibly.

Verkkokauppa.com recognizes the importance of conducting its business in a sustainable and responsible manner by way of implementing and promoting economically, environmentally, and socially responsible practices in all its business operations. The commitment to responsible business is an integral part of the culture, success, and values of Verkkokauppa.com.

Verkkokauppa.com expects all its business partners to adhere to its [Code of Conduct](#) and requires all its suppliers to adhere to this Supplier Code of Conduct. For the purposes of this Supplier Code of Conduct, the term “**Supplier**” means any company, corporation or other entity that sells or seeks to sell goods or services to Verkkokauppa.com.

In addition, Verkkokauppa.com places specific requirements for its private label suppliers (“**Private Label Suppliers**”) operating in so-called risk countries, where the risk of human and labor rights violations is elevated, based on the World Bank’ s Worldwide Governance Indicators or equivalent widely recognized risk-country specification, such as [Amfori BSCI](#).

The below topics set out the main criteria required by Verkkokauppa.com. However, to ensure meeting the requirements and expectations placed upon Verkkokauppa.com, Verkkokauppa.com may from time-to-time issue more specific instructions, guidelines, and policies relating to the subject matter of this Supplier Code of Conduct that it expects its Suppliers to comply with.

1 COMPLIANCE WITH LAWS

When delivering products or providing services to Verkkokauppa.com, Supplier shall comply with all applicable laws, regulations, orders of competent authorities as well as international treaties. Further, Supplier shall take all necessary measures required for Supplier to comply with this Supplier Code of Conduct.

To the extent Supplier employs agents or subcontractors for the fulfilment of any of Supplier’s obligations under the agreement between Verkkokauppa.com and Supplier, Supplier shall ensure that such agents and subcontractors adhere to this Supplier Code of Conduct.

2 ANTI-BRIBERY AND ANTI-CORRUPTION

Verkkokauppa.com does not approve or condone any forms of bribery or corruption and applies a zero-tolerance approach thereto. Therefore, Supplier is required to take all necessary and appropriate measures for preventing bribery and corruption in its operations and comply with all applicable anti-bribery and anti-corruption laws (whether national, international, federal, or otherwise) applicable to Supplier’s operations, specifically as regards the delivery of products or services to Verkkokauppa.com.

Having regard to the above, Supplier agrees not to (whether through its employees, directors, board members, or third parties) offer, promise, or grant to any employees, directors, board members, or other bodies of any company, institution, governmental agency, or any other representatives thereof, any gifts or other benefits (such as money or gifts of significant monetary value).

The foregoing does not apply to product samples which are provided to Verkkokauppa.com for trial or quality evaluation purposes in the ordinary course of business.

3 HUMAN RIGHTS AND DUE DILIGENCE

Supplier shall respect international declarations, conventions and recommendations, including, for example, the Universal Declaration of Human Rights and the UN Convention on the Rights of the Child, the fundamental conventions of the International Labour Organisation (ILO), the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

Supplier shall respect and promote internationally recognized human rights in its own operations and in its entire value chain and, in accordance with the UN Guiding Principles on Business and Human Rights, avoid causing or contributing to adverse human rights impacts through its own activities, and address such impacts when they occur, and seek to prevent or mitigate adverse human rights impacts that are directly linked to its operations, products, or services by its business relationships, even if it has not contributed to those impacts.

Supplier shall practice due diligence and, where necessary, identify, prevent, end, or mitigate adverse impacts of its activities on human rights and on the environment.

Supplier shall assess the risks relating to manual labor (such as the use of potentially hazardous materials, operation of dangerous machinery or equipment, etc.) by reference to the general knowledge of the risk factors in the industry and any specific risk factors identified by Supplier.

4 SOCIAL RESPONSIBILITY IN TRADE

Verkkokauppa.com is a participant of Amfori, a business association for open and sustainable trade, and thereby committed to observing and promoting responsible working conditions and environmental practices in its supply chain in the spirit of continuous improvement according to currently valid [Amfori BSCI Code of Conduct](#).

The Amfori BSCI Code of Conduct covers the following topics:

- Social Management System and Cascade Effect
- Workers Involvement and Protection
- The Rights of Freedom of Association and Collective Bargaining
- No Discrimination, Violence or Harassment
- Fair Remuneration, including progressive work towards the payment of living wages
- Decent Working Hours
- Occupational Health and Safety
- No Child Labour
- Special Protection for Young Workers
- No Precarious Employment
- No Bonded, Forced Labour or Human Trafficking
- Protection of the Environment
- Ethical Business Behavior

Verkkokauppa.com **expects all its Suppliers** to commit to the Amfori BSCI Code of Conduct or an equally comprehensive social sustainability scheme approved by Verkkokauppa.com and upon request either demonstrate proof of an adequate due diligence process or proof of adherence to such an approved social sustainability scheme.

In addition, Verkkokauppa.com **requires its Private Label Suppliers** operating in risk countries to join Amfori BSCI and to demonstrate a valid and satisfactorily completed Amfori BSCI audit.

Alternatively, i) Supplier may join an equally comprehensive social sustainability scheme, such as SA8000 or SMETA/Sedex, and demonstrate a valid third-party audit by a reliable and internationally recognized company with the relevant credentials covering an equivalent scope; or, ii) Supplier shall at its expense undergo such a third-party audit commissioned by Verkkokauppa.com. Supplier shall commence its audit process at the latest at the start of the co-operation.

Supplier commits to work progressively to remediate any negative findings surfaced in an audit in the spirit of continuous improvement. Possible zero-tolerance situations, such as child labor or bonded labor, shall be addressed and mitigated according to the currently valid Amfori BSCI zero-tolerance protocol. Supplier commits to worker involvement and to providing workers with a grievance mechanism.

5 ENVIRONMENTAL RESPONSIBILITY

Verkkokauppa.com wants to ensure that the products and services that it sells are produced in an environmentally responsible way. Verkkokauppa.com expects its Suppliers to comply with all applicable environmental laws and to promote responsible environmental practices in their own supply chains. Supplier shall look for ways to improve its environmental performance and adhere to the following minimum requirements:

5.1 Environmental management system

The Supplier shall implement procedures and/or set up an environmental management system and practices to identify, monitor and measure its environmental impact and continuously strive to improve its environmental work by minimizing the negative environmental impacts of its activities.

5.2 Energy and climate

Verkkokauppa.com has committed to the Science-Based Targets (“SBTi”) climate initiative to reduce its indirect emissions in line with the 1.5-degree target of the Paris Agreement. With the SBTi commitment, Verkkokauppa.com focuses on reducing indirect emissions in the value chain by seeking to engage its suppliers and partners in climate work.

Verkkokauppa.com encourages its Suppliers to commit to the SBTi initiative to set their own science-based targets to cut down greenhouse gas emissions and to develop the availability of emission data. Verkkokauppa.com reserves the right to prioritize and select Suppliers who have committed to, or are in the process of committing to, the SBTi initiative. Supplier shall, upon request, provide a reliable statement of its climate goals and potential commitment to the criteria and targets set out in SBTi. The lack of such commitment may affect the selection, continued engagement, or renewal of agreements.

The Supplier shall look for ways to reduce energy consumption and greenhouse gas emissions and to favor renewable energy, when available. The Supplier shall, upon request, provide information on the greenhouse gas emissions related to the production of the products or services it provides to Verkkokauppa.com, or in the lack thereof, information about the Supplier’s energy consumption and source.

5.3 Waste

Supplier shall establish and implement procedures and practices for waste management and disposal, minimize the production of waste, and promote the reuse of materials.

5.4 Chemicals and hazardous substances and pollution of air, water, and soil

Supplier shall ensure the safe handling, movement, storage and disposal of chemicals and hazardous substances and abide by the relevant EU chemicals regulations, for example RoHS and REACH.

Verkkokauppa.com encourages its Suppliers to work towards reducing the use of hazardous chemicals where possible. The Supplier shall establish and implement procedures and practices for the treatment of pollution to air, water, and soil.

5.5 Circular economy and life-cycle perspective

Supplier adheres to the valid EU rules and regulations relating to the ecological design ("Ecodesign"), and, in co-operation with Verkkokauppa.com, seeks ways to extend the lifecycle of the products it provides to Verkkokauppa.com through for example product modularity, repairability, and the availability of spare parts.

Supplier shall aim towards employing a life-cycle perspective concerning the assessment of the environmental impact of its products and services and shall place environmental requirements also on its own supply chain.

5.6 Sustainable packaging materials

Verkkokauppa.com encourages **its Suppliers** to select packaging materials that are most suitable for the environment, use them efficiently, and continuously seek ways to reduce and optimize packaging materials.

In addition, Verkkokauppa.com requires **its Private Label Suppliers** to abide by Verkkokauppa.com's packaging instructions valid from time to time as well as in co-operation with Verkkokauppa.com, seek ways to consider sustainability aspects of their packaging materials:

- Choosing FSC or PEFC certified paper and cardboard materials
- Not using PVC plastic and opting for PET, PE-LD and PP plastics due to better recyclability
- Printing designs on elemental chlorine free (ECF) or totally chlorine free (TCF) paper/carton
- When possible, opting for renewable materials instead of plastic, recycled materials instead of virgin materials, recyclable materials instead of non-recyclable, and improving recyclability through sorting instructions, and looking for ways to measure the impacts of these changes.

5.7 Biodiversity

The Supplier shall commit to protecting the environment and understanding the connections that its business has on biodiversity, for example related to water use and disposal or deforestation, and, as relevant, taking appropriate actions to safeguard biodiversity.

6 RESPONSIBLE SOURCING OF CERTAIN HIGH-RISK MATERIALS

Verkkokauppa.com requires all its Suppliers to identify the possible connections that their business have on materials that pose a high risk on the fulfillment of human rights or sound environmental practices and practice appropriate due diligence by introducing necessary policies and practices to mitigate the related social and environmental risks.

The manufacturing of consumer electronics involves the risk of using conflict minerals, as the devices use metals such as gold, tin, tantalum, and tungsten. These minerals may be mined in areas where there is armed conflict, human rights abuses, and corruption. In addition, electronics manufacturing may use other minerals or rare earth metals that carry a risk of adverse human rights and environmental impacts.

Verkkokauppa.com requires its electronics Suppliers to follow the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or equivalent procedures to ensure responsible sourcing of minerals.

When sourcing minerals **directly**, Supplier shall purchase only from responsible smelters, identified by using lists provided by third parties, such as that of [Responsible Minerals Initiative](#).

When Supplier engages in sourcing minerals only **indirectly**, e.g., through the purchase of components that contain minerals, Supplier shall strive, within its sphere of influence, to encourage all parties in its supply chain to pursue the above practices.

Verkkokauppa.com requires its electronics Suppliers to, upon request, provide information on whether they engage in sourcing of minerals directly or indirectly.

7 COMPLIANCE, CONTACT, AND REPORTING MISCONDUCT

Verkkokauppa.com expects all Suppliers to respect this Supplier Code of Conduct and actively endeavor to comply with them.

Verkkokauppa.com reserves the right to carry out audits and/or inspections or allow an independent third party of its choice to carry out such audits and/or inspections to ensure that Supplier complies with this Supplier Code of Conduct.

If Verkkokauppa.com finds that a Supplier does not comply with this Supplier Code of Conduct, Verkkokauppa.com will notify Supplier thereof and provide a detailed description of the corrective action required to be taken by Supplier to become compliant. In case Supplier disregards the notification or otherwise fails to take corrective action, to Verkkokauppa.com's satisfaction, Verkkokauppa.com may, without limiting any other remedy or right it may have, suspend or terminate all agreements in effect between Verkkokauppa.com and Supplier and/or to exclude Supplier from any future tender process.

The primary contact for enquiries relating to this Supplier Code of Conduct is the Supplier's appointed contact person at Verkkokauppa.com.

We encourage our Suppliers and their employees, directors, and board members to report any actual or potential misconduct and violations of law or this Supplier Code of Conduct that relate to or may impact Verkkokauppa.com. reports can be made via a reporting channel hosted by an independent third party at firstwhistle.fi/verkkokauppa.com.

This Supplier Code of Conduct has been approved by the Board of Directors of Verkkokauppa.com Oyj on 13 July 2022 and is reviewed periodically. This Supplier Code of Conduct has been last reviewed and amended on 15 July 2025.

[SIGNATURE PAGE FOLLOWS]

8 SIGNATURE

By signing below, you confirm that you have received, reviewed, and understood this Supplier Code of Conduct. You confirm you shall comply with this Supplier Code of Code and shall ensure compliance by your employees and subcontractors. You also confirm your willingness to verify your compliance with this Supplier Code of Conduct upon our request by and at your expense a self-assessment questionnaire, certification, third party assessment, or on-site audit.

I hereby represent I have the authority to sign on behalf of the undersigned Supplier.

Name of the Supplier: _____

Signature: _____

Name: _____

Position: _____

Date: _____