

# Inlook Group Oy

## Supplier Code of Conduct

Inlook Group Oy and its subsidiaries ("Inlook") are committed to conducting business in accordance with applicable laws, rules, and regulations. An integral part of Inlook's values and corporate culture is ethical, honest, open, and fair conduct. The Code of Conduct is an important part of Inlook's responsibility. Inlook operates responsibly, caring for the environment and people, and investing in all respects in high-quality and professional operations. Inlook bears its responsibility for sustainable development, safety, and social responsibility as part of the surrounding society.

Inlook requires its suppliers, contractors, and other business partners ("Suppliers") to act responsibly and to be committed to ethical business practices. Suppliers must comply with all applicable local, national, and international laws, rules, and regulations, as well as this Code of Conduct. Suppliers refer to all entities that supply products, personnel, or services to Inlook.

### **1. Accuracy of Information, Confidentiality, and Data Protection in Supplier Relationships**

Suppliers must provide accurate and sufficient information about their business, finances, and other matters relevant to the supplier relationship. Suppliers must ensure that all reports, recordings, and invoices submitted to Inlook contain all necessary information and are accurate.

Confidential information obtained by Suppliers from Inlook or its business partners must be kept confidential and handled with care and in a secure manner. Confidential information must be used only for the specific purposes agreed upon by the parties and must be disclosed only to those who absolutely need it to fulfil their role in cooperation with Inlook. In addition, Suppliers must comply with applicable laws governing the processing of personal data, including the European Union General Data Protection Regulation (GDPR). Suppliers must ensure that confidential information and personal data are appropriately protected to ensure the secure handling and storage of such information. Suppliers must notify Inlook immediately if they suspect any security breaches or data leaks concerning this information.

## 2. Open and Fair Competition and Conflict of Interest

Suppliers must conduct their activities in a manner consistent with fair competition, comply with applicable competition laws and regulations, and avoid influencing the market by unfair means.

Suppliers must also avoid situations that could create conflicts of interest between the Supplier and Inlook, including interactions with Inlook personnel that may create a conflict of interest for the personnel to act in Inlook's best interest. If the Supplier becomes aware of any such conflicts of interest, they must be reported to Inlook immediately.

## 3. Intellectual Property Rights (IPR)

Suppliers must respect the intellectual property rights of Inlook and other parties and comply with laws and regulations concerning intellectual property rights. Infringement or misuse of intellectual property rights, such as patents, copyrights, and trademarks, is prohibited.

## 4. Anti-bribery, Anti-corruption, Anti-money Laundering, and Sanctions

Suppliers must comply with laws and regulations regarding the prevention of bribery and corruption, and act honestly and in accordance with good business practices and in a manner that does not damage Inlook's reputation or the public trust in Inlook. Requesting, offering, or accepting gifts, payments, hospitality, or other benefits intended to influence decision-making is prohibited. Gifts and hospitality must always be reasonable in value and customary. Hospitality may be offered if there is a genuine and documented business reason for it, and costs remain reasonable. It is recommended that the person representing Inlook pays for their own travel and accommodation expenses in such situations.

Suppliers must comply with all applicable laws, rules, and regulations regarding prevention of money laundering, export control, trade restrictions, and economic sanctions. Suppliers must comply with international sanctions and the restrictions imposed by international sanctions on the export and import of products. Suppliers must not conduct business, directly or indirectly, with any persons or entities listed on the European Union or United States OFAC (Office of Foreign Assets Control) sanctions list, nor conduct business directly or indirectly with any sanctioned country or territory.

## 5. Labour and Human Rights

Suppliers must respect human rights and fair labour practices in accordance with internationally recognised human rights, such as those expressed in the conventions of the United Nations, the Council of Europe (COE) and the International Labour Organisation (ILO). Suppliers must ensure that no human rights violations occur in their own operations or value chains.

Inlook sets the following requirements for Suppliers:

- **Discrimination and Mistreatment:** Employees must be treated with respect and dignity, and equality and equal opportunities must be actively promoted. Discrimination based on race, religion, gender, pregnancy, political beliefs, age, nationality, ethnic origin, sexual orientation, marital status, or disability is prohibited, as is harassment or mistreatment.
- **Fair Wages and Working Hours:** Employees must have an employment contract in a language they understand, be paid a fair wage, and be offered reasonable working hours, always applying the stricter of internationally recognized principles or local legislation.
- **Child and Forced Labour:** Suppliers must not employ children under the age of 15, and employees aged 15-17 must not be employed in hazardous work or tasks that endangers their health, safety, or morals. Forced labour must not be used in any form. Employees must have the freedom to leave their employment after a reasonable notice period and must not be required to deposit money, identity documents, or other valuables with their employer. Suppliers must actively identify and reduce the risks of child or forced labour in their own operations and supply chains.
- **Freedom of Association:** The freedom of employees to organize and their right to freely choose their representatives, to form or join trade unions and to collectively bargain for better wages and working conditions must be recognized and respected.
- **Working Conditions:** Employees must be provided with a safe and healthy working environment. Employees and subcontractors must be given appropriate health and safety information, training, and protective equipment. Any accommodation provided must be clean, safe, and meet the basic needs of workers. The use of alcohol or drugs, or working under their influence, is strictly prohibited when working on Inlook's or its customers' premises.
- **Occupational Health and Safety Monitoring and Improvement:** Suppliers must regularly assess occupational health and safety risks, identify problems, and implement necessary corrective measures.

## 6. Environment

Suppliers must comply with all applicable laws, rules, and regulation concerning the environment or sustainable development, identify the environmental impact of their operations, and strive to reduce the adverse effects of their operations on the environment. Suppliers are encouraged to use natural resources efficiently and promote environmentally friendly products.

Suppliers should pay attention to the lifecycle impacts of their products and services and the efficient use of the materials they use. Suppliers must ensure that harmful soil changes, water and air pollution, noise emissions and excessive consumption of water and energy, as well as unsustainable use of resources, are avoided. Suppliers must ensure that the products they supply are safe for people and the environment, meet the quality and safety standards specified in the agreements, and comply with regulatory requirements.

Suppliers must use raw materials of known origin, maintain the traceability of raw materials and finished products, and provide this information to Inlook upon request.

## 7. Supply Chain Management

This Code of Conduct must also be applied to Suppliers' subcontractors who are involved in the delivery of goods, personnel, or services to Inlook. Suppliers must ensure that their subcontractors are aware of this Code of Conduct and comply with its principles. If a subcontractor of the Supplier violates this Code of Conduct, the Supplier commits to replace the subcontractor with another immediately if the violation cannot be corrected, and without undue delay if the violation can be corrected but the subcontractor does not correct the violation within a reasonable time.

Suppliers must recognize that many international and national regulations, particularly in the European Union, require information to be available throughout the supply chain. This particularly applies to sustainability-related issues such as environmental impacts and human rights. Suppliers undertake to provide this information to Inlook or Inlook's customers upon request and to otherwise comply with the requirements of these regulations.

## 8. Compliance and Monitoring

Suppliers must monitor compliance with this Code of Conduct and demonstrate that they comply with it in their operations. Inlook has the right to periodically check whether the Supplier complies with this Code of Conduct. Suppliers undertake to provide Inlook with the required documents requested by Inlook for its monitoring. In addition, Inlook or an independent auditor appointed by Inlook has the right to inspect the Supplier's premises to verify how the Supplier complies with the Code of Conduct.

Inlook has the right, at its own discretion, to suspend or terminate the business relationship with a Supplier if the Supplier materially or repeatedly violates this Code of Conduct or repeatedly and unreasonably refuses to provide the required information.

Inlook requires that Suppliers report any violations of Inlook's Code of Conduct or concerns either through Inlook's contact person or through Inlook's reporting channel [Link].

## CONFIRMATION OF THE SUPPLIER

We hereby confirm the following:

1. We have received a copy of the Supplier Code of Conduct of Inlook Group Oy and its subsidiaries ("Inlook") and we commit to comply with it;
2. This Inlook Supplier Code of Conduct and this declaration are considered attached to all agreements made with Inlook and are thereafter part of those agreements;
3. We agree that Inlook or an independent auditor appointed by Inlook may conduct inspections (audits) at our premises to verify that we comply with Inlook's Supplier Code of Conduct;
4. We will communicate the contents of Inlook's Supplier Code of Conduct to our own suppliers in the value chain and ensure that they commit to complying with it; and
5. This confirmation is governed by Finnish law, excluding its choice of law rules.

[Place, Date]

[Company]

[Signatures]

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[Name and Title]