



CODE OF CONDUCT

FEBRUARY 2023



MESSAGE FROM THE CEO

Suunto is a global company having presence in all major markets. To operate with integrity in this complex environment, we need common guidelines. The most important of these guidelines is our Code of Conduct which describes how we put our values into practice every day. It guides the work of our employees and everyone who works on our behalf. It describes our commitments and expectations towards our suppliers and partners, and also how we respect our own employees. The Code of Conduct explains to all our stakeholders the principles under which we operate.

Our business is based on our four core values: Real Deal, Trusted Companion, Contagious Passion, Pioneering Exploration. In our Code of Conduct, we explain how our values are linked to actions, e.g. how we conduct our business ethically, take environment into account; how we respect human and labor rights, promote equal opportunities, and safety at work; how we comply with laws and regulations, prevent fraud and protect our customers' data; how we deal with intellectual property, and much more.

In all of our business units and functions, the management is in charge of enacting and instilling these values and ensuring that these principles are respected. We provide periodical training to employees about the content of the Code of Conduct. We also have an open and anonymous Whistleblowing channel that can be used if an employee or a stakeholder has any concerns related to the implementation of the Code of Conduct, related legislation or the company's ethical policies.

The Leadership Team and I are confident that all of our employees act in accordance with our Code of Conduct. Only by working together with integrity we are able to strive for excellence and achieve our goals for the future.

We stay committed and focused on developing our high-end products, inspiring adventurous lifestyle and on protecting our playground.

David Chang

CEO

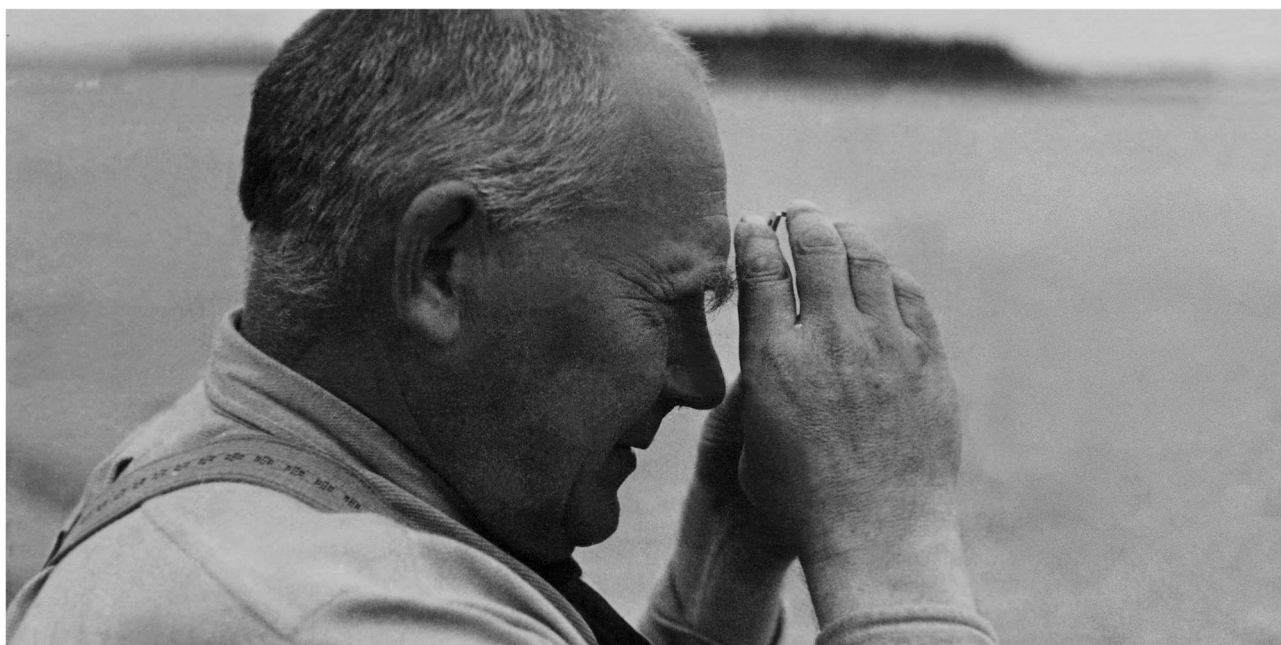




TABLE OF CONTENTS

REAL DEAL	4
TRUSTED COMPANION.....	6
CONTAGIOUS PASSION	7
PIONEERING EXPLORATION	9
ENFORCEMENT	10



INTRODUCTION

This Code of Conduct outlines and sets the key ethical principles of Suunto Oy (“Suunto”) for how we all must act as individuals and as a company, wherever we operate.

This Code also defines how we handle our relationships with our clients, business partners, employees and other stakeholders. This Code applies to all directors, managers and employees of Suunto worldwide. Suunto is committed to the highest standards of personal and professional behavior in every aspect of business. Our core values are: Real Deal, Trusted Companion, Contagious Passion and Pioneering Exploration. These core values are the basis of every action we take.

Suunto employees are responsible individually and collectively for their own conduct and for observing the highest standards of business ethics, for upholding the principles of fair dealing, for considering the rights of others, for acting with integrity, and for being a good corporate citizen. Suunto is committed to maintaining a speak up culture by promoting open discussion with employees at all levels.

Employees can ask any questions related to the Code from and raise concerns to their line manager, their Human Resources Business Partner, to Legal team or through Suunto’s confidential and anonymous reporting channel (Whistleblowing channel).

We expect our business partners to respect the ethical principles of this Code of Conduct. Our external and internal suppliers are expected to follow the Ethical Policy of Suunto and the local and international legal requirements.

The principles of this Code of Conduct are based on our core values.





REAL DEAL

Strong performance is key to our success. We continuously develop our brand and products. The determination to win encourages a strong work ethic and top-level performance.

Our products

We promote healthy and active living through our products, which encourage and provide access to exercise and fitness. We invite people of all ages to discover the fun of exercise, helping them stay healthy and active throughout their lives.

To secure our long-term growth and profitability we need to listen to the needs of our end consumers and other stakeholders and meet their expectations for our products. We also need to conduct a sustainable and responsible business and manage relevant risks and opportunities.

Environment

Suunto is committed to protecting the environment and preventing pollution through responsible design, operation, manufacturing and delivery of high-quality products and services. We respect nature in all of its facets.

Our guiding principles are:

- Designing long-lasting products with consideration on minimizing the environmental impact
- Seeking ways to reduce environmental footprint across processes and operations
- Collaborating with suppliers for improving their sustainability practices

We are committed to continually improving our environmental performance and fulfilling compliance obligations in the countries we operate. Suunto is ISO 9001:2015 and ISO 14001:2015 certified.



TRUSTED COMPANION

We believe in team spirit and teamwork. Our team consists of strong individuals who contribute to our common goals.

Human and labor rights

We respect human rights and are committed to follow the principles of the United Nations' Universal Declaration on Human Rights and the conventions of the International Labour Organization (ILO). We respect human and labour rights, and do not tolerate forced, compulsory or child labour in any form, for which Suunto has issued a Modern Slavery and Human Trafficking Statement. These principles apply to the entire value chain, including our own employees and Suunto's suppliers' employees. We actively monitor the performance of our suppliers and provide training to help ensure such standards are met.

Suunto has an Ethical Policy which provides further guidance on these matters.

Safety at work

We are committed to the wellbeing of our employees as well as any non-employees working at our premises and promote a positive safety culture at work and on business travels.

Suunto provides its employees with a workplace that is safe and healthy and has a systematic approach to manage safety at work to prevent accidents and occupational injuries and illnesses.

All employees are required to comply with applicable laws, rules and instructions that relate to safety at work and business travel that apply to their employment.

Preventing harassment

Suunto expects that all employees treat each other and our stakeholders with respect. We do not tolerate harassment of any kind and our employees are responsible for creating and maintaining working environments that are free from harassment or other inappropriate behavior.

Equal opportunities and diversity

We promote equal opportunities and diversity and have zero tolerance for discrimination.

No one is to be treated differently because of their ethnicity, race, religion, political opinions, age, nationality, gender, disability or sexual orientation.

Suunto has issued a Diversity, Equity and Inclusion (DEI) Statement that provides further information on the topic.

Communication with external stakeholders

Suunto encourages employees to promote Suunto and our products in a positive way and context. Employees must always act responsibly and respectfully and must never disclose any confidential or harmful information about our business and products.



CONTAGIOUS PASSION

Compliance with laws

Suunto conducts business all over the world. Suunto is responsible to comply with all applicable laws and regulations. This Code is not intended to substitute or override laws or regulations. In case of a conflict between the Code and applicable law, law shall prevail. Nothing in this Code should be understood as an instruction to break the law.

Competition compliance

In all our operations, we compete ethically, fairly and vigorously in accordance with the principles of free and fair competition and applicable antitrust and competition laws. Anti-competitive practices are strictly forbidden.

Fraud, bribery and corruption

We have zero tolerance for fraud, bribery and corruption in any form. Suunto and its employees do not engage in the giving or receiving, directly or indirectly, of bribes, kickbacks, other illicit payments or improper benefits intended to achieve business advantage or financial gain. Our zero tolerance approach applies to transactions made directly or through third parties, such as agents.

Suunto has an Anti-Bribery and Anti-Corruption Policy which provides further guidance on these matters.

Gifts

Our employees do not accept, give, offer or demand money, gifts, benefits, unusual forms of hospitality from or to any person with whom we do business, any person with whom we are seeking to do business, or any person who is seeking to do business with us. Any request and offer concerning improper payment, benefit, gift or hospitality shall be rejected.

Customary business gifts and corporate hospitality can be offered and accepted as acts of courtesy that help foster relations between parties, provided that they are given in compliance with applicable laws and that they do not breach this Code of Conduct.

Anti-money laundering

We are committed to comply fully with anti-money laundering laws throughout the world. Money laundering occurs when funds from illegitimate sources are brought into legitimate financial channels to hide them or make them appear legitimate. We expect all our employees to notify the organization if any suspicious or unusual activities are noticed.



Conflicts of interest

All employees are obligated to act solely in the best interest of Suunto at all times, avoiding situations that involve a conflict or the appearance of a conflict between duty to the company and personal interest. A conflict of interest arises when an employee has competing personal or professional interests, making it difficult to fulfill employment duties impartially. All Suunto employees are required to disclose any potential conflicts of interest to their line manager. No personal or close relations with business partners shall affect our decision-making.

Know your business partner

Our business partners include natural and legal persons with whom we contract, such as distributors, consultants, agents, influencers and suppliers. In order to ensure that we only work with reputable third parties, we perform a risk-based due diligence on them before engaging with such third parties.

Export control

Export control laws and regulations imposed by governments relate to e.g. sanctions and trade embargoes in order to prevent, e.g. terrorism and arms proliferation. Violations of these laws can have serious consequences. Therefore we must ensure compliance with applicable export control laws and regulations before engaging with third parties.

Data Privacy

We respect the privacy of our consumers and the confidentiality of their personal data. Our consumers' confidential information is properly protected and used only for intended business purposes. In accordance with the privacy laws, consumers' personal data will not be used for other purposes than for those for which it has been obtained.

Political contributions

Suunto does not provide, either directly or indirectly, financial support to political parties or political groups. Suunto employees keep their political activities clearly separated from the work.





PIONEERING EXPLORATION

The essential prerequisite for our development is innovation, and the prime motivation for innovation is to always assess and question our current methods of operation.

Intellectual property

We seek to generate and promote new and innovative ideas and concepts and Suunto employees are expected to highlight and promote innovation. To protect innovative achievements from any infringement, damage, loss, theft or misuse, all Suunto employees must take appropriate action to safeguard our intellectual property from unauthorized access by third parties. Correspondingly, we respect intellectual property rights owned by others.

Confidentiality

We protect Suunto and our brand by being security conscious and safeguarding our sensitive information. We also respect and safeguard sensitive information of our business partners.





ENFORCEMENT

Any violation of this Code is likely to damage the brand and reputation of Suunto and therefore the Code must be rigorously enforced.

Failure to follow the principles outlined in the Code will be taken seriously and can result in disciplinary action, dismissal or even criminal charges.

All Suunto employees are expected to fully co-operate in investigations of any misconduct, to the extent required by law.

Any Suunto employee, who becomes aware or suspects a possible violation of this Code is required to report such violation to Suunto's legal function without delay, and present facts detailing the situation.

An anonymous reporting channel (Whistleblowing channel), where violations and concerns can also be reported, is in operation throughout Suunto. The channel can be found on the intranet and Suunto website.

No retaliatory action will be taken for reporting an actual or possible violations of the Code of Conduct in good faith.

**SUUNTO**

**SUUNTO**

<http://www.suunto.com/>

