

# Ethical Policy

## SCOPE OF THE POLICY

Suunto's Ethical Policy sets out the fundamentals of the ethical and environmental principles for the Suunto operations and value chain. The Ethical Policy communicates our commitment to uphold human rights in all our activities according to the internationally recognized social and ethical standards including International Labour Organization (ILO) conventions and the United Nations' Universal Declaration on Human Rights. Suunto is committed to improving the due diligence practices to ensure all employees and people in its supply chain are treated with respect and dignity.

The Ethical Policy applies to all operators in the Suunto supply chain including suppliers and partners and Suunto's own operations alike. Suppliers are business partners through the entire supply chain including but not limited to contractors, subcontractors, and any party running facilities producing components, materials for Suunto's products.

The company, with its supervisors, employees and partners shall comply with these standards and all applicable national and international laws, regulations and industry best practices applicable to any activities on, but not limited to: sourcing, manufacturing, sales and distribution and recycling.

## IMPLEMENTATION

For Suunto's own office, manufacturing and sales personnel abroad, Suunto Leadership Team and respective Managers are in charge of the implementation of the Ethical Policy. Ethical Policy is a part of the Suunto Supplier Requirements, and suppliers agree to respect the Ethical Policy by signing Supply Agreements with Suunto (through the Suunto Sourcing Team). In line with Suunto's dedication to high-quality products, we aim to build stable and lasting partnerships with our suppliers. This is expected to enhance the communications related to ethical standards and assist continuous improvement.

## MONITORING

All parties shall maintain adequate and transparent records to demonstrate compliance with all provisions under the Ethical Policy. To implement and develop the responsible sourcing system, Sustainability and Sourcing Teams cooperate on the monitoring of the suppliers through self-assessments and on-site factory visits and organizing periodical third-party audits -as per the Supplier monitoring cycle- to monitor the adherence to the Ethical Policy.

## COMMUNICATION OF THE POLICY

Suunto shall take appropriate steps to ensure that this Ethical Policy is communicated to the employees in Employee Info events -including Suunto's teams in sourcing countries-, to partners and stakeholders when making contracts and publicly via [www.suunto.com](http://www.suunto.com). The Whistleblowing channel is also directly accessible to everyone online and Suunto shall ensure that reviews of issues raised are conducted in a fair, credible and effective manner without any retaliation.

## WHISTLEBLOWING CHANNEL

Suunto expects its staff members, supervisors, suppliers and their workers to report any issues that cause adverse human right impacts. If there is a violation of any of the standards of the Ethical Policy, suspicion of fraud or misconduct, employees or any other stakeholders are encouraged to notify the issue through the confidential Whistleblowing channel at: <https://report.whistleb.com/en/suunto> in English or in their native language. This is a service organized according to the EU Whistleblowing directive (EU 2019/1937) and all communication is kept strictly confidential and anonymous during the process. Any person raising issues shall be free from retaliation due to using the channel.

## RELATED POLICIES

Suunto Code of Conduct

Slavery and Human Trafficking Statement

Anti-Corruption and Anti-Bribery Policy

Suunto Substance Requirements

Supplier Requirements

The US Law No: 117-78 (12/23/2021) banning products or materials whose origins are in Xinjiang province of China\*

\*it is a duty of all partners, suppliers and their suppliers/sub-contractors to make sure the law is observed on any materials or components supplied to Suunto.

# Ethical Policy

## 1. EMPLOYMENT RELATIONSHIP

Employers shall adopt and adhere to rules and conditions of employment that respect employees and, at a minimum, safeguard their rights under national and international labour and social security laws and regulations.

## 2. PROHIBITION OF CHILD LABOUR

Recruiting child labour is prohibited. Following the ILO Minimum age convention, people under the age of 15 or under the age for completing compulsory schooling or under the legal minimum age for employment in the country, whichever is the highest, will not be employed. In the case of hazardous work the minimum age is 18 years. The employment of young persons shall comply with any laws applicable for the protection of such persons. The hiring procedure includes the collection of all documentation necessary to confirm and verify the date of birth of the employees. A safe remediation and transition procedure -with a specialized agency or organization- shall be implemented if child labour is found.

## 3. PROHIBITION OF FORCED LABOUR

The employment is always freely chosen, and it is prohibited to use any forced or involuntary labour, whether prison, bonded, indentured, or otherwise. All forms of human trafficking and forced labour are forbidden, as are practices such as requiring lodging deposits or retaining identity documents from the employee at the start of the employment. Neither Employers nor any entity supplying labour to it shall withhold any part of any employee's salary, benefits, property, or documents in order to force such employee to continue working for the Employers. Employees are free to leave the employment after a reasonable notice period.

## 4. PROHIBITION OF HARASSMENT

Each employee shall be treated with dignity and respect, and it is prohibited to use corporal punishment, threats of violence, or any other forms of physical, sexual, psychological or verbal harassment or abuse.

## 5. PROHIBITION OF DISCRIMINATION

Discrimination is prohibited in hiring and employment practices including salary, benefits, access to training, advancement, discipline, termination or retirement, on the basis of race, religion, caste, age, nationality, social group or ethnic origin, sexual orientation, gender, political affiliation or opinion, disability or membership in employees' organizations including unions.

## 6. COMPENSATION

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. Employers shall pay at least the legal minimum wage or the appropriate prevailing wage in the sector and task in question, whichever is higher. Wages, overtime compensation and any related benefits are paid as required by applicable law, regulations or respective employment contract. Employers are encouraged to take actions to progressively implement employees' right to decent compensation.

## 7. WORKING HOURS

Working hours must comply with national laws and collective agreements but a regular work week shall not exceed forty-eight (48) hours. Other than in exceptional circumstances, the sum of regular and overtime hours shall not exceed sixty (60) hours in a 7-day period. Employers shall allow employees at least twenty-four (24) hours consecutive rest in every seven-day period. All overtime shall be voluntary and it is used responsibly, safeguarding worker's health and safety. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate.

## 8. HEALTH AND SAFETY

Employees are to be provided with a safe and healthy workplace in compliance with applicable laws and by utilizing the prevailing knowledge of any specific hazards in the industry. At a minimum, access to potable water and hygienic sanitary facilities, fire safety, adequate lighting and ventilation and protection when using chemicals or harmful substances are provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers. Adequate steps shall be taken to prevent potential causes of accidents and injuries to employees associated with the working environment or occurring in the course of work. All employees shall receive regular and repeated health and safety training, including new and reassigned employees. Responsibility of health and safety is assigned to a management representative and occurrence of safety trainings etc. are recorded.

## 9. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Employers respect the rights of employees to freedom of association, and the right to organize and collectively bargain without penalty or interference. Employees are free to join an organization of their own choosing and them doing so will not result in any negative consequences to them. Employees are allowed to freely elect their own representatives. When the right to freedom of association and collective bargaining is restricted under law, employers shall not obstruct the development of alternative means for independent and free association of employees.

## 10. DATA PRIVACY

Employers respect the privacy of their employees. All personal data collected or held will be processed in a fair, discreet and lawful manner that protects the privacy of individuals.

## 11. PROTECTION OF INTELLECTUAL PROPERTY

Any party involved in doing business with Suunto, whether an employer, employee or a partner, shall avoid directly or indirectly infringing or misappropriating any patent, trademark, copyright, trade secret, or other intellectual property right of any third party, or otherwise violate any rights of any third party in the manufacturing process.

## 12. PROHIBITION OF CORRUPTION & BRIBERY

Any party involved in doing business with Suunto do not engage in giving or receiving, directly or indirectly, of bribes, kickbacks, other illicit payments or improper benefits intended to achieve business advantage or financial gain. Situations that involve a probable conflict between duty to employers and personal interest shall be avoided.

## 13. SUBCONTRACTING

Suppliers shall not subcontract finished goods or components production work without prior written approval from Suunto. Suunto partner/supplier shall monitor its authorized subcontractors (if any) to ensure compliance with this Ethical Policy and Suunto Supplier Requirements.

## 14. ENVIRONMENTAL STANDARDS

In addition to complying with local and international environmental laws and regulations regarding the handling and discarding of chemicals and other hazardous materials, waste disposal and management, Suunto and its suppliers strive to reduce negative environmental impacts of the operations and continuously improve the environmental performance. The goal should be to minimize waste creation and greenhouse gas emissions by for example increased energy- and material efficiency and ensuring responsible sources of raw materials and substances. Suunto Substance Requirements (document attached to all Supply Agreements) shall be followed by all actors in the supply chain.