

INTRODUCTION

This report/statement describes the current status and factors related to modern slavery and human trafficking risks in Suunto Oy (later Suunto) operations and supply chains and lays out the action plan on it. This document is prepared in accordance with Ethical Trading Initiative Framework for Slavery & Human Trafficking statements and Section 54 (Transparency in Supply Chains) of the UK Modern Slavery Act 2015. Apart from the annual report to the UK Government, it is also used for reporting under Canada's Bill S-211. Suunto expresses zero tolerance towards any form of modern slavery in our operations or supply chains. Suunto is committed to acting ethically and transparently, dedicated to improvements outlined in this statement, while also supporting external initiatives that help build responsible supply chains. This report/statement describes the calendar year 2025, third full year of Suunto having its own ethical policy framework (until May 2022 belonging to a multi-brand group whose code of conduct and policies were followed).

BUSINESS AND SUPPLY CHAINS

Suunto was founded in 1936 in Finland and still has its office and factory in Vantaa, Finland. We design, manufacture and sell GPS sports watches, dive computers, compasses and headphones, which we make for sports enthusiasts, people passionate about outdoors and marine environments. Suunto is committed to developing high-end products, inspiring adventurous lifestyle and on protecting our playground. Suunto products are made durable, repairable and long-lasting which is also the most efficient way to reduce the environmental and social impacts that products cause in their lifetime from raw material sourcing, manufacturing, use and end-of-life.

Suunto products are sold in around 100 countries. Until May 2022 Suunto was part of Amer Sports Group and followed its CSR and environmental policies and practices. From May 2022 Suunto has been owned by Liesheng, China, being its subsidiary and a separately registered company in Finland.

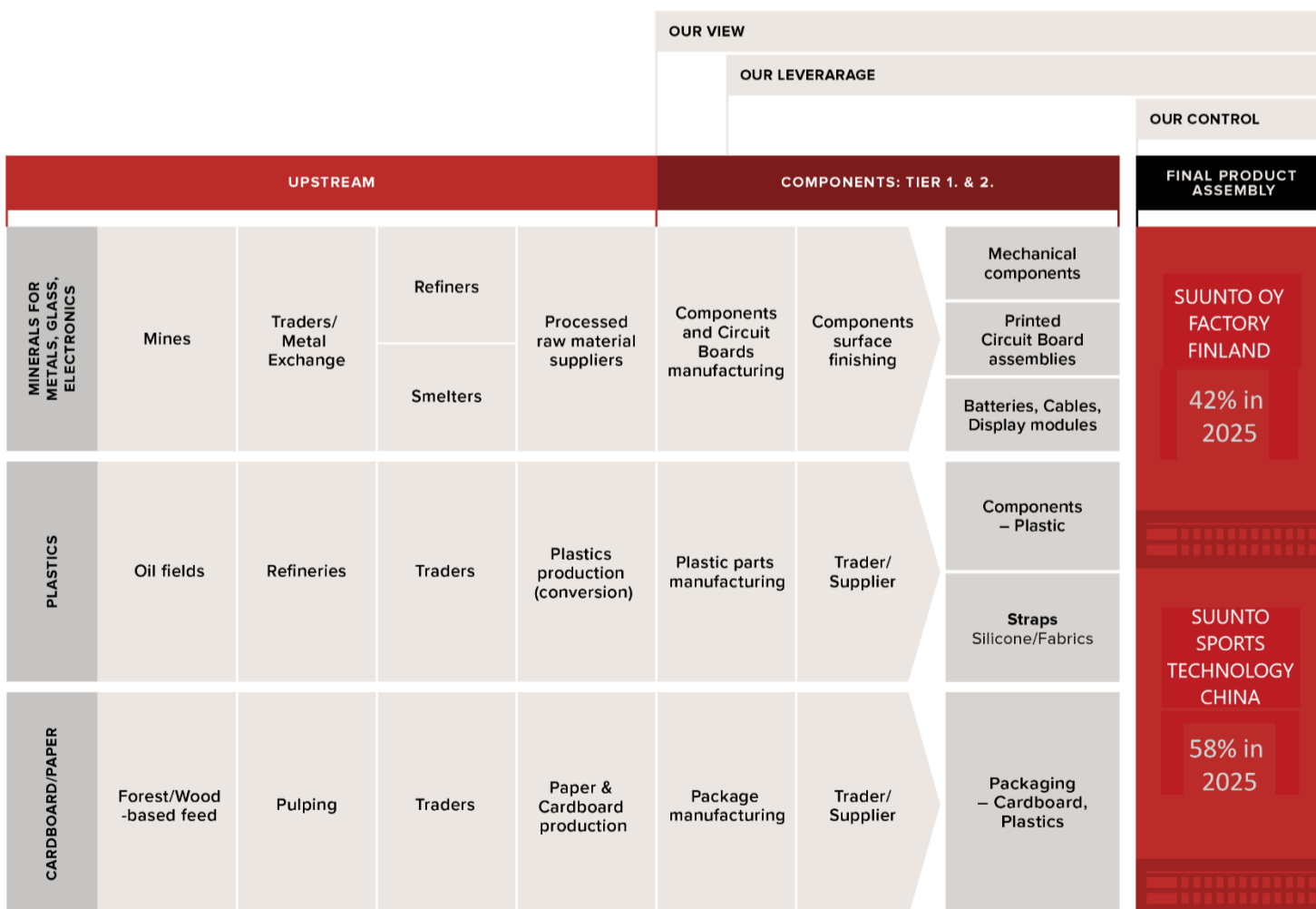
In 2025 the assembly of our main product category, sport watches, as well as headsets was done in China (58% of all products) by our parent company, while Suunto Oy, Finland, produced compasses, dive products and precision instruments (42% of all products). Majority of Suunto's 200 employees are located in Finland, part of them being regional sales and marketing teams located in different countries. The Finnish (or European) legislation is followed for all Suunto's own employees. This is the area of direct control from the point of labour rights and working conditions in Suunto value chain.

Suunto has a sister company in China (Suunto Sports Technology China) owned by the parent company, also having a factory in China, employing Suunto-specific full-time employees on product development and assembly. The final responsibility on decisions related to suppliers, sourcing and production lies with the parent company in China, supported by Suunto Oy Sourcing, Product Development and Sustainability teams.

Majority of the components used in Suunto's electronic products originate from Asia. Other product categories have components and sub-assemblies also from Europe, including Finland. We have visibility and leverage on Tier 1; we know all our component suppliers. Apart from this we do have a partial view on Tier 2 suppliers.

We acknowledge the complexity of the supply chains in the global electronics sector (component and part sub-manufacturers) and the extractives sector supplying raw materials for the components used in products (mines, smelters/refineries and wholesalers/traders), leading to low visibility. We are not importing or trading minerals used in electronics directly, but we are voluntarily supporting industry initiatives developing human rights due diligence and environmental responsibility in the extractives sector.

The following map describes the material flows and tiers in our value chain.



POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN TRAFFICKING

The following Suunto policies and requirements are connected to modern slavery and prohibit the use of forced- or child labour, or any practices related to modern slavery and human trafficking in Suunto value chain. Suunto Ethical Policy includes the areas of, but is not limited to, Ethical Trading Initiative's Base Code and takes into account United Nations' Universal Declaration of Human Rights and International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, UN Guiding Principles and OECD guidelines. The principles defined in the Ethical Policy -if followed successfully-, would prevent situations and conditions that can facilitate or enable modern slavery.

- Code of Conduct
- Ethical Policy
- Substance Requirements (*incl. conflict minerals)
- Supplier Requirements
- Anti-Bribery and Anti-Corruption Policy
- Whistleblowing channel

Suunto Leadership Team guides the company compliance and approves the policies, including Modern Slavery Statement (this report). One person in the Leadership Team has a dedicated responsibility of sustainability. Managers of different teams are in charge of implementing the Code of Conduct and ethical principles and requirements as part of their work. The Ethical Policy is part of the Supplier requirements -document package, to which suppliers adhere to by signing the Supplier Requirements Declaration annually. This also includes agreeing to be part of the supplier monitoring and auditing, if required. Suunto Sustainability and Sourcing (Finland) are responsible for the design and maintenance of the responsible sourcing system; its policies and documents. Suunto Sourcing (main team in sister company in China, supported by Suunto Finland) is responsible for the selection of suppliers and the communication of the Supplier requirements to them. In line with Suunto’s dedication towards high-quality products, we aim to build stable and lasting partnerships with suppliers. This is expected to enhance communication related to continuous improvement and ethical standards.

Suunto has a publicly accessible whistleblowing channel and a process to handle any possible grievances through it. The channel is anonymous and accessible to everyone through Suunto’s website www.suunto.com. Suunto holds the right to terminate a business relationship with a supplier if there is a violation of social or environmental requirements or laws. The central policies and the whistleblowing channel have been translated into Chinese – the language of the main sourcing location/origin of the components used in products.

IDENTIFICATION OF RISKS AND STEPS TAKEN TO PREVENT AND MANAGE THE RISKS

The basis for the responsible sourcing is the identification of the ¹⁾ Industry-/sector -related risks and hotspots and ²⁾ Risks related to the main geographical area of sourcing. We have done both of these analyses based on data and statistics of numerous international research institutes, civil society and human rights organizations, and update them annually. The human rights work is led by the Senior sustainability manager and the Leadership team is updated in the periodical management reviews, and as needed. The risks and impacts identified were validated in 2024 with external consultants while conducting a double materiality assessment as part of the preparation work for the EU Corporate Sustainability Reporting Directive.

This table describes the industry hotspots ie. the most common risks in electronics value chain.

SUPPLY CHAIN	MINING	TRADERS	REFINERS/ SMELTERS	TRADERS	COMPONENT MANUFAC.	LOGISTICS	ASSEMBLY CHINA	LOGISTICS	ASSEMBLY FINLAND	PACKAGING/ LOGISTICS	USE	END OF LIFE
RISK	←-----→											
Child or Forced labour	●		●		●		●					○
Conflict/ Human rights	●											
Water / Soil pollution					●							○
Loss of Biodiversity	●											
Hazardous chemicals			●		●							
Emissions			●		●	●		●		●		○
Decent work/Living wages	●		●		●		●					○
Plastic waste					●		●			●		●
E-waste												●

● = Social/Human Rights risks ● = Environmental risks

Moving up in the value chain from Suunto’s own factory, the components sourced originate from South-East Asia, mainly China -classified as a risk-country related to decent work indicators and labour rights. Based on the most recent reports and data from reputed international organizations like ILO, World Bank, Amnesty International, Transparency International, Freedom House, Global Slavery Index, the main risks related to our key sourcing context include:

- Forced labour (including forced migrant labour); Child labour
- Excessive and/or involuntary overtime
- Lack of freedom of association

The following are also risks in our sourcing context based on wide sample of statistics, but have to be studied more closely, in the exact production location, at a particular point of time:

- Low wages vrs. Living wage (concrete paid wages w/a overtime vrs. the Global Living Wage Coalition’s benchmarks)
- Working conditions and safety
- Discrimination/inequality by gender and other factors
- Corruption and limiting freedom of expression are risks that are linked to the realization or prevention of other risks.

Belonging to sustainability organisations and networks, participating in regular training and peer-discussions and integrating the knowledge into our policies and practices is part of the risk prevention. Maintaining the policies and requirements and communicating them to suppliers (explained below) is one method of risk management. Suunto is a member of FIBS (Finland Business and Society, a corporate responsibility network of Nordic countries, a partner of WBCSD) -including its Human Rights Working Group and RMI (Responsible Minerals Initiative). In 2023 Suunto Finland became a member of Sedex, followed by Suunto's sister company in China in 2024, both units completing the Sedex Self-Assessment. In 2025 the first SMETA audit, following the audit methodology of Sedex, was conducted in the factory of Suunto China by external auditors. No forced labour was detected by the auditing company.

DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING IN BUSINESS AND SUPPLY CHAINS

After the company ownership change in 2022 and a full revision of all the policies on corporate responsibility, we have created a supplier requirements process and update the requirements annually, also in 2025. We ask all suppliers to sign a Supplier Requirements Declaration (SRD), this process prepared in cooperation by Suunto Legal, Sustainability, Sourcing and Leadership teams. The supplier requirements consist of policies on environmental, ethical, substance and quality -related requirements, including decent work and condemnation of forced labour.

For possible closer monitoring (and/or site audits), a more targeted group of suppliers will be selected first, based on the significance of the supplier and the risk status of the production location. When selecting new suppliers and negotiating supply agreements, Suunto Sourcing team assesses suppliers by various compliance and quality aspects, including adherence to our policies and requirements. Records are kept on the Supplier Requirements Declarations signed by the suppliers.

From 2023 Suunto Finland has been a member in the supply chain sustainability organization Sedex who provides tools and methodologies for supply chain transparency and monitoring. In 2024 our sister company in China also became a member and both companies have completed their self-assessment questionnaire (SAQ) with Sedex. The SAQs are updated annually, as in 2025. Like explained above, in 2025 the manufacturing unit by Suunto China also had its first external social audit, which will be renewed annually.

We stay informed on the development of regulation against imports whose value chains may include forced labour and reflect the changes in our requirements and procurement processes. The recently approved forced labor regulations and/or the enforced implementation of the existing legislation, for example the EU Forced Labor Regulation and US Uyghur Forced Labor Prevention Act, guide companies in developing their due diligence practices.

EFFECTIVENESS IN ENSURING THAT SLAVERY AND HUMAN TRAFFICKING IS NOT TAKING PLACE IN BUSINESS OR SUPPLY CHAINS

As described in the Risks-section, the main sourcing countries and the complexity of supply chains of the electronics sector do pose also Suunto supply chain to slavery and human trafficking risks, although we as a business also do have some positives (long trade relations with some of the suppliers; our product offering focusing on high quality and durability).

This is Suunto's fifth Modern Slavery Statement (the first published in 2022 being the "baseline"). *The action plan* on mitigating modern slavery and human rights risks in our supply chain below is mainly output-oriented, as in the first years we have set up the framework (policies, processes, implementation plan and selected a partner organization/auditing methodology), that we have begun to implement. Both internal organizational changes, but also external changes in the regulatory environment (especially the EU) have caused additional work and delays on some aspects of the plan below. The progress will be updated annually through this report/statement and our annual Sustainability report published at suunto.com/sustainability.

RISK	ONGOING EFFORT	ACTIONS, Baseline mid-2022	ACTIONS, Status end-2025
Possibility of forced labour; forced migrant labour; involuntary overtime; child labour in manufacturing risk countries.	<ul style="list-style-type: none"> Building responsible sourcing framework ie. tools, schedule and implementation plan for assessment, monitoring, improvement, grievance and remedy process Communicate and cooperate with suppliers and receive their consent to participate in responsible sourcing activities as described in the Supplier requirements documents (incl. Ethical Policy) 	Goal: Documents stating the supplier requirements ready, Whistleblowing channel open.	
		<ul style="list-style-type: none"> Ethical Policy Modern Slavery Statement Supplier Requirements Whistleblowing channel 	The policies and requirements updated annually as per need and English & Chinese versions sent to suppliers. In 2025 Ethical Policy and the Substance Requirements were updated.
		All policies renewed in 2022, Whistleblowing channel open.	Responsibility of the Supplier Requirements process management shared with the sister company staff managing suppliers in China.
		Setting up the procedure on possible cases detected via Whistleblowing channel.	Completed. No cases related to suspected labour/human rights violations were reported through the channel between 2022-2025.
	<ul style="list-style-type: none"> Continuous follow-up on country & industry risks, research and development of legislation on decent work topics Update context- and risk-assessment annually Organise training as per need 	Translating Ethical Policy, Modern Slavery Statement and Whistleblowing channel in main supplier languages.	Documents in place. New translations in Chinese for updated documents done in 2025 as planned. 2025 WB channel in Chinese published.
		Goal: Documents communicated in needed supplier languages and signed by suppliers.	
		-	Supplier Requirements Declaration + policies sent to suppliers and consent received by signature. Instead of a limited scope of strategic suppliers, Supplier Requirements were sent to all suppliers. 75,5% approved the requirements. 24,5% rejected, reasons being; having their own Code of Conduct (mainly large global companies); companies selling very small volumes to Suunto or no response.
		Goal: Membership in/cooperation with a responsible sourcing or ethical trade organization.	
	Cooperating with/ membership in an NGO specialized in supply chain human rights issues for verification of our system.	Completed. Membership in Sedex for both Suunto Oy, Finland from 2023 (and Suunto sister company in China 2024).	
	Goal: Strategic suppliers are active in the Sedex system - have done first round of self-assessment & findings are assessed for future steps.		

		Process and schedule for extended supplier monitoring and auditing drafted.	Sedex self-assessment questionnaire (SAQ) completed for both Suunto Finland and China. Organisational changes caused delays in implementing with external suppliers; we have first focused on the compliance and auditing the factories inside our own group.
		Goal: Auditing plan for the first batch of suppliers in place.	
		Selecting auditing partner.	Completed (Sedex SMETA).
			Sedex Self-Assesment Questionnaires maintained and updated annually. First SMETA audit of the Suunto China manufacturing unit by a third party done in 2025.
		Goal: Relevant staff in Finland and China trained on decent work and supply chain human rights topics.	
		Training of related staff.	Continuous. 2025 training on supplier selection organized to China Sourcing by the Finland Sourcing & Sustainability. Decent work topics focused prior to the external audit in the end-2025.
		Goal: Responsible sourcing has indicators and records progress on them. Learn from cooperating with the suppliers and Sedex analytics and audit results and develop the work beyond audits.	
		<ul style="list-style-type: none"> ▪ After the system is set up & functional: draft (outcome level) KPIs ▪ Work on remedy procedures ▪ Continuous assessment of training needs and the possibility to take the system further 	<p>The process of sending the Supplier Requirements Declaration to suppliers is documented, progress followed and contracts archived.</p> <p>The 2024 double-materiality assessment in preparation for the EUCSRD re-validated the human rights risks and impacts in the value chain.</p> <p>In 2025 EU Omnibus delayed the CSRD/ dropped Suunto out of its scope. A decision to report on the VSME reporting framework was done; although VSME does not cover the supply chain, we continue working on this area as per our plans.</p>
Raw materials (extractives sector)	Beyond own control and visibility – support partners/networks specialized in the topic	Goal: Membership in/cooperation with a responsible mining initiative/organization	
		Membership in a leading industry organization on extractives sector due diligence.	Completed (RMI membership since 2022).
		Study on recycled raw materials.	In process/continuous.
		Minerals regulations compliance (added in 2024 statement/report)	EU Battery Regulation and its Due Diligence requirement on minerals (2025: delayed by EU Omnibus). In 2025 Suunto's sister company in China started an annual Conflict Minerals supplier assessment, collecting suppliers' conflict minerals data via RMI's CMRT, the supplier response rates being 88% in Finland and 97% in China/Asia.

TRAINING AND CAPACITY BUILDING ON MODERN SLAVERY

Familiarizing with the company policies and Code of Conduct is part of the onboarding process of new employees joining Suunto. In 2025 Suunto Code of Conduct was renewed and it was mandatory for all employees to familiarize with it and sign it online. Suunto Sustainability cooperates with various functions in the company, offering information and training on sustainability compliance topics. Sustainability had a presentation in the Employee info for all employees during 2025. Awareness raising and information sharing on forced labour risks and due diligence needs are done for teams both in Finland and China. In 2025 Sourcing and Sustainability (Finland) offered training to China Sourcing team on supplier selection and criteria. Sustainability and compliance topics were communicated to the company owners in China via the Compliance and Business Reviews. During the year sustainability function participated in several trainings on corporate responsibility and human rights due diligence and continued in the Human Rights Working Group of FIBS (Finnish Business and Society). Suunto continued the memberships in Responsible Minerals Initiative (RMI) and Sedex, both organizations offering training to their members.

This statement was approved on 21st May 2026.

On behalf of the Suunto Oy Leadership Team,

Niina Sappinen

VP Finance, Procurator