

## CODE OF CONDUCT FOR SUPPLIERS

Responsibility is an essential part of Mastermark Oy's business operations. Mastermark's sustainability program is based on the principle of continuous improvement, and new actions are regularly added to the program. Our daily work is guided by the **UN Sustainable Development Goals**, **our environmental policy** (ISO 14001:2015), **quality guidelines** (ISO 9001:2015), **occupational health and safety instructions** (ISO 45001:2015), **information security and data protection** (ISO 27001:2022) and our principles related to social responsibility.

The development of our sustainability work is guided by the requirements set by society, our stakeholders, and the business environment, as well as our commitment to international human rights principles and the appreciation and respect of employees and stakeholders.

Mastermark Oy is committed to acting in a socially and ethically exemplary manner, and we believe we are globally responsible for every person involved in the production of our products and services. Mastermark is committed to the goals of the **UN Sustainable Development Initiative** and is a member of **amfori BSCI**. Mastermark's Code of Conduct is based on the principles of the **UN Sustainable Development Goals**. In addition to the principles of the Code of Conduct, we comply with all applicable laws and regulations in our operations. The Code of Conduct forms the foundation for value-based work. We require our entire supply chain to commit to and follow the same principles.

### Human Rights

Mastermark respects human rights in all its operations and requires that employers in our supply chains respect fundamental human rights, treat their employees fairly and respectfully. We strive to ensure that our operations do not violate human rights. Mastermark expects its suppliers to commit to the **UN Universal Declaration of Human Rights** and the **ILO Declaration on Fundamental Principles and Rights at Work**.

Mastermark does not accept child labor or forced labor in any form. We expect our suppliers to provide safe and hygienic working conditions for their employees. The work environment must consider potential hazards, employees must receive regular training, and sanitary facilities must be clean and provide access to clean water.

Employees must be paid wages that, including benefits, meet at least national standards. Wages must be sufficient to cover basic needs. Employees must always receive written information in an understandable format about the terms of employment related to wages.

Working hours must comply with national laws and industry standards, whichever provides better protection. Under no circumstances should employees be required to work more than 48 hours per week on a regular basis, and they must be given at least one day off for every 7-day period. Overtime must be voluntary, not exceed 12 hours per week, not be regularly required, and must always be compensated.

Discrimination in any form is not accepted in wages, compensation, training, promotion, termination, or retirement.

Physical abuse or discipline, threats of physical abuse, sexual or other harassment, and other forms of intimidation or exploitation are prohibited.

We respect employees' freedom of association and their right to collective bargaining.

## Environmental Responsibility

Mastermark's environmental work is certified according to **ISO 14001:2015**. We are committed to the **UN Rio Declaration on Environment and Development**, and our environmental policy and strategy are based on it. Mastermark is committed to complying with environmental legislation and regulatory requirements and is dedicated to **combating climate change** in its operations. Our goal is to manage and minimize the environmental impacts of our business, and we continuously develop our operations.

We expect our suppliers to commit to mitigating climate change by minimizing their negative environmental impacts on land, water, biodiversity, climate, and air, and by handling any waste in accordance with applicable laws and manufacturer instructions. Suppliers are required to demonstrate their environmental actions upon Mastermark's request.

## Corporate Responsibility

Our company requires all suppliers and partners to operate honestly, transparently, and ethically, and to commit to the **UN Convention Against Corruption**. Suppliers may show appreciation for the business relationship, but we **only accept reasonable and proportionate small tokens** that are clearly **business-related, transparent, and in accordance with the law and good practices**. Under no circumstances do we accept bribery or attempts to influence our company's decision-making through financial benefits, luxury gifts, travel, or other favors.

If a supplier attempts to **bribe, pressure, or otherwise improperly influence our buyers or other personnel**, we consider it a serious **violation of our anti-corruption policy**.

### Actions and Consequences for Suppliers

If a supplier is found to have violated these principles, our company may take the following actions depending on the severity and recurrence of the violation:

1. **A written notice** and discussion with the supplier's management.
2. **Suspension of the supplier relationship or deliveries** until the matter is resolved.
3. **Immediate termination of the supplier agreement** due to breach of contract.
4. **Exclusion from future tenders or cooperation projects**, either temporarily or permanently.
5. **Notification to authorities** if the actions meet the criteria of bribery or other criminal offenses.

Our company may also require the supplier to create or update their **own anti-corruption action plan** or **participate in ethical conduct training** provided by our company before cooperation can continue.

### **Anti-Money Laundering**

Our suppliers must not engage in any activity related to money laundering, its facilitation, or concealment of related actions. We require suppliers to comply with all applicable laws and regulations to prevent money laundering and to report immediately if any suspicious activity is detected.

### **Product Safety**

Mastermark expects its suppliers to ensure that their products are safe for their intended use. A

**Declaration of Conformity** is a mandatory document for products subject to such requirements by the European Union. Mastermark will send the EU Declaration of Conformity to the supplier, and the supplier is expected to complete and return the certificate to Mastermark within two working days.

### **Information Security**

Mastermark considers information security a key part of responsible business. We require all our suppliers and subcontractors to commit to a high level of information security and to protect confidential information in all situations related to cooperation.

#### **Data Protection**

Suppliers must ensure that all data obtained or processed during cooperation — including trade secrets, personal data, and other confidential materials — is protected with appropriate technical and organizational measures. These include firewalls, encryption, access control, and staff training in information security.

#### **Processing of Personal Data**

If a supplier processes personal data on behalf of our company, we require that the processing complies with the EU General Data Protection Regulation (GDPR). A separate data processing agreement must be drawn up for such processing.

#### **Security Incidents and Reporting**

Suppliers must immediately report any data breaches or other incidents that may affect our company or our customers. The report must include the scope of the incident, its impact, and the actions taken.

#### **Audit Rights and Cooperation**

We reserve the right to inspect or commission audits to ensure that the supplier's information security practices meet agreed requirements. The supplier must provide the necessary documentation and support the audit in a spirit of cooperation.

#### **Responsibility and Continuous Improvement**

Suppliers are expected to maintain up-to-date information security practices and continuously improve them to meet evolving threats and regulatory requirements.

Compliance with information security requirements is a condition for cooperation. Serious negligence may lead to contract termination and possible claims for damages.

### **Local Suppliers and Suppliers Operating in Low-Risk Countries**

Mastermark requires its contracted suppliers to commit to Mastermark's Code of Conduct by signing it. Suppliers are responsible for ensuring that any third parties in their supply chains meet the requirements of this Code. Any deviations or violations must be reported to Mastermark immediately in writing.

Mastermark reserves the right to audit the supplier's operations during the cooperation.

### **Suppliers Operating in High-Risk Countries**

Mastermark requires its contracted suppliers to undergo third-party audits under the amfori BSCI framework.

### **Whistleblower Channel**

Mastermark has established an anonymous whistleblower channel to identify violations of these principles. The channel is available at: <https://www.mastermark.fi/ilmoituskanava>

### **Monitoring and Cooperation**

We reserve the right to monitor compliance with these principles and to request clarifications or documentation when necessary. We expect our partners to operate transparently and cooperatively in resolving any unclear situations.

Compliance with this ethical guideline is a condition for cooperation. Serious violations may lead to contract termination and possible claims for damages.

As a supplier to Mastermark Oy, we require you to take immediate contact if you have questions about how to implement this Code of Conduct.

We have approved and will follow the above guidelines.

Date:\_\_\_\_\_

Name:\_\_\_\_\_

Title:\_\_\_\_\_

Company:\_\_\_\_\_