

# Ethical Policy

## SCOPE OF THE POLICY

Suunto's Ethical Policy is part of Suunto's human rights due diligence and sets out the principles of ethical and environmental conduct in Suunto's operations and for the suppliers in the value chain. The Ethical Policy communicates our commitment to upholding human rights in all of our activities according to the internationally recognized ethical standards including International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations' Universal Declaration of Human Rights, UN Guiding Principles and OECD guidelines. Suunto is committed to improving the human rights due diligence practices to ensure all employees and people in its value chain are treated with respect and dignity.

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

The company, 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 part of the company's value chain, like sourcing, manufacturing, sales, distribution and end of life.

## IMPLEMENTATION

For Suunto's own operations, Suunto Leadership Team and managers are in charge of the implementation of the Ethical Policy. Suunto Sourcing - with the help of Sustainability, Legal and Risk management - are responsible for supplier cooperation and compliance. Ethical Policy is part of Suunto's Supplier Requirements, which suppliers agree to respect by signing the Supplier Requirements Declaration annually or when starting a business relation and signing a Supply Agreement with Suunto. In line with Suunto's dedication to produce high-quality products, we aim to build stable and lasting partnerships with our suppliers. This is expected to enhance communications related to ethical standards and assist continuous improvement.

## MONITORING

All parties shall maintain adequate records and agree to exchange of information to demonstrate compliance with the provisions under the Ethical Policy. To develop responsible sourcing and to ensure adherence to the Ethical Policy, Suunto's Sourcing and Sustainability teams cooperate on supplier monitoring through self-assessments, on-site factory visits and periodical third-party audits.

## COMMUNICATION OF THE POLICY

Suunto shall take appropriate steps to ensure that this Ethical Policy is communicated to Suunto's employees and relevant teams, suppliers and stakeholders when making contracts and publicly via [www.suunto.com/sustainability](http://www.suunto.com/sustainability).

## WHISTLEBLOWING CHANNEL

A public grievance channel is accessible to everyone online at: <https://report.whistleb.com/en/suunto>. In the case of violation of any of the standards of the Ethical Policy, suspicion of fraud or misconduct, employees and stakeholders are encouraged to notify the issue through the whistleblowing channel. This is a service organized according to the EU Whistleblowing directive (EU 2019/1937) and all communication during the process is kept strictly confidential and anonymous. Any person raising issues shall be free from retaliation due to using the channel.

## RELATED SUUNTO POLICIES

Suunto Code of Conduct

Slavery and Human Trafficking Statement

Anti-Corruption and Anti-Bribery Policy

Suunto Substance Requirements

Supplier Requirements document  
and Supplier Requirements Declaration

# 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

Use of 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 children and youth, and not pose a threat to their health, development and education. The hiring procedure includes a review of all documentation necessary to 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 by the employee. All forms of human trafficking and use of forced labour are forbidden, including prison or bonded labour. Also practices such as requiring lodging deposits or retaining identity documents from the employee at the start of the employment are forbidden. Neither employers nor any entity supplying labour to them shall withhold any part of the employee's salary, benefits, property, or documents in order to force an employee to continue working for the employer. Employees are free to leave the employment after a reasonable notice period. Suunto suppliers ensure they will not source raw materials or components from areas sanctioned by any national/international forced labour laws.

## 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, promotion, discipline, termination or retirement, on the basis of gender, age, religion, caste, nationality, social group or ethnic origin, sexual identity, political affiliation or opinion, disability or membership in employees' organizations including unions.

## 6. ADEQUATE 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 (a living wage). 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. Any deduction from the salary will be according to the law. 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, anyhow a regular work week cannot 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. After six days of consecutive work, employees must have one day (24 hours) off. All overtime shall be voluntary and 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. Adequate steps shall be taken to prevent potential causes of accidents and adverse health effects to employees. Employees have access to potable water and hygienic sanitary facilities, fire safety, adequate lighting and ventilation. Protective gear is provided when using chemicals or harmful substances. All employees shall receive regular and repeated health and safety training, including new and reassigned employees. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers. Responsibility of health and safety is assigned to a management representative and occurrence of safety trainings 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 a union or employee's organization of their own choosing and them doing so will not result in any negative consequences. Employees are allowed to freely elect their own representatives. When the right to freedom of association and collective bargaining is restricted under the law, employers shall not obstruct the development of alternative means for employees' independent association.

## 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. The supplier will also protect the data acquired of Suunto company and its employees via the business relation.

## 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 business or manufacturing processes.

## 12. PROHIBITION OF CORRUPTION & BRIBERY

The highest level of integrity is followed in all business activities. 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 the employer and personal interest shall be avoided.

## 13. SUBCONTRACTING

Suppliers shall not subcontract production of finished goods or components without written pre-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 Suunto and its suppliers strive to reduce the negative environmental impacts of the operations and continuously improve the environmental performance. The goal should be to minimize the use of materials, waste creation and greenhouse gas emissions by increased energy- and material efficiency and ensuring responsible sources of raw materials and substances used. Responsible waste management and disposal, safe handling and discarding of chemicals and other hazardous materials is organized. Suunto Substance Requirements (document attached to all Supply Agreements) shall be followed by all actors in the supply chain.