



# S-BANK SUPPLIER CODE OF CONDUCT

## 1. Introduction

- 1.1** S-Bank Group (hereinafter “S-Bank”) follows the sustainability principles described in this document in its operations. S-Bank requires that all its service providers, suppliers, and other business partners, as well as their subcontractors (hereinafter collectively “suppliers”), also comply with the principles described in this document.
- 1.2** These sustainability principles are part of the agreement between S-Bank and the supplier. Suppliers are obligated to ensure that their employees and subcontractors also comply with these principles.

## 2. Sustainability Principles Applicable to Suppliers’ Operations

- 2.1** S-Bank is committed to good governance and ethical business practices and respects all internationally recognized human rights in its operations and in the procurement of products and services. S-Bank expects similar practices from its suppliers.
- 2.2** S-Bank requires its suppliers to comply with good governance and good business practices. Suppliers shall act against bribery and all forms of corruption. Corruption includes, for example, the abuse of entrusted power for private gain. Bribery includes the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust.
- 2.3** S-Bank requires its suppliers to comply with applicable laws and collective agreements and to respect all internationally recognized human rights, international labour standards of the International Labour Organization (ILO), the principles of the Universal Declaration of Human Rights, and the Convention on the Rights of the Child. Suppliers shall ensure the implementation of these principles in their operations and supply chain.
- 2.4** S-Bank requires its suppliers to have procedures in place to ensure compliance with applicable laws and regulations in their operations, including S-Bank’s Supplier Code of Conduct.

### 3. UN Guiding Principles on Business and Human Rights

- 3.1** S-Bank is committed to identifying, preventing, mitigating, and remedying human rights risks in accordance with the UN Guiding Principles on Business and Human Rights. S-Bank's suppliers shall follow appropriate due diligence in managing their supply chains and ensure the implementation of the UN Guiding Principles on Business and Human Rights. If a supplier does not have an explicit commitment from management to the UN Guiding Principles on Business and Human Rights, the supplier has the responsibility to clarify how compliance with the principles is ensured.
- 3.2** S-Bank's suppliers shall have procedures in place to manage potential human rights risks in their operations and value chain. The procedures shall be proportionate to the activities conducted and cover the identification, mitigation, and remediation of human rights risks. The procedures shall cover risks that may occur in the company's own operations, supply chain, and the use of products and services.
- 3.3** S-Bank's suppliers shall have a whistleblowing mechanism for their own employees and for the employees in the supply chain to anonymously report violations, abuses, and corruption related to labor and human rights. If such whistleblowing mechanism is not available, the suppliers shall promote the possibility of using S-Bank's confidential whistleblowing channel to its own employees and the employees in the supply chain: <https://report.whistleb.com/en/s-pankki>

### 4. Climate and Environmental Principles

- 4.1** In its operations S-Bank aims to mitigate harmful impacts on the climate, environment, and biodiversity in accordance with the UN Sustainable Development Goals. S-Bank expects its suppliers to also consider the environmental impacts and risks of their operations and to promote these considerations in their supply chains.
- 4.2** Suppliers shall exercise due diligence in assessing their environmental impacts and risks and in preventing, minimizing, and remedying negative impacts.
- 4.3** Suppliers shall have appropriate procedures in place to identify environmental impacts. Suppliers shall identify the environmental impacts of their operations and proactively reduce emissions to air, soil, and water, and use natural resources efficiently.
- 4.4** Suppliers shall identify the environmental legislation applicable to their operations, comply with it, and be responsible for substantiating their regulatory compliance. Depending on the operations, compliance may require suppliers to have an environmental management system that includes procedures for waste, chemicals, emissions, and wastewater and is in accordance with the principle of continuous improvement.
- 4.5** Suppliers are expected to calculate greenhouse gas emissions (GHG) from their own operations. Additionally, S-Bank encourages its suppliers to set reduction targets for GHG emissions, for example, in accordance with the Science Based Targets Initiative.
- 4.6** Suppliers are encouraged to primarily use renewable materials and energy sources and to utilize circular economy models to maximize recyclability and reuse of materials.

## 5. Compliance with Sustainability Principles

- 5.1** Suppliers shall ensure compliance with the obligations described here in its procurement and monitor their own operations and supply chain for possible breaches. If S-Bank's supplier does not have a direct business relationship with parts of its supply chain where environmental or human rights risks have been identified, S-Bank expects the supplier to consider actions to increase its influence to mitigate the identified risks where possible.
- 5.2** Suppliers shall, upon request, demonstrate how they comply with the requirements of this Supplier Code of Conduct in their own operations and in respect of their supply chains. Suppliers shall, upon request, provide S-Bank with additional information about the conditions of production of the product or service as necessary for assessing its compliance with the requirements of this Supplier Code of Conduct.
- 5.3** S-Bank has the right to perform an audit or commission a third-party audit to ensure compliance with the requirements presented here.
- 5.4** If the supplier identifies any breaches of these principles with respect to its supply chain, S-Bank's suppliers shall promptly report the breach to S-Bank, as well as any further investigations or corrective actions taken. S-Bank may require the supplier to provide a separate plan for further investigation or corrective actions.