

S-BANK'S SUPPLIER CODE OF CONDUCT

1. Introduction

- 1.1** S-Bank Group (hereinafter referred to as "S-Bank") is committed to good governance, its Code of Conduct and adherence to internationally recognised human rights in its own activities and in the procurement of its products and services.
- 1.2** S-Bank's activities are guided by international agreements and guidelines, such as the UN Declaration of Human Rights, the UN Convention on the Rights of the Child, the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.
- 1.3** S-Bank requires that service providers, suppliers and other partners it has a contractual relationship with, as well as their subcontractors (hereinafter collectively referred to as "Suppliers"), adhere to the principles described in Sections 2–6 below in their activities. Suppliers are responsible for ensuring that their subcontractors adhere to the same principles.
- 1.4** The Code of Conduct described in Sections 2–6 of this document defines the minimum requirements for Suppliers and forms part of the contractual framework between S-Bank and the Supplier.

2. Compliance with laws and regulations

- 2.1** S-Bank requires its Suppliers to comply with applicable laws and regulations.
- 2.2** Each Supplier shall have procedures in place to ensure compliance with relevant laws and regulations and S-Bank's Supplier Code of Conduct.

3. Governance principles

- 3.1** S-Bank requires its Suppliers to adhere to good corporate governance and sound business practices. Suppliers shall prevent and manage conflicts of interest and adhere to truthful and transparent marketing practices.
- 3.2** Suppliers shall act against bribery and all forms of corruption.
- 3.3** Suppliers shall combat financial crime, such as money laundering, terrorist financing, violations of international sanctions, fraud, tax evasion and other fraudulent activities.

- 3.4** Suppliers shall comply with competition law, including prohibitions on price-fixing, market sharing, and the abuse of a dominant market position.

4. Respect for labour and human rights

- 4.1** S-Bank expects its Suppliers to respect internationally recognised human rights.
- 4.2** Suppliers shall avoid causing or contributing to negative human rights impacts.
- 4.3** Suppliers shall comply with applicable working time legislation and occupational health and safety regulations. The Suppliers are expected to identify and prevent impacts related to excessive working hours, occupational health and workplace safety.
- 4.4** Suppliers shall comply with applicable collective agreements and respect their employees' freedom of association and right to collective bargaining.
- 4.5** Suppliers shall treat their employees equally and prevent discrimination and harassment of their employees.
- 4.6** S-Bank requires that its Suppliers do not allow the use of forced labour or child labour in their operations or supply chain.
- 4.7** Suppliers shall ensure that their employees are paid at least the wages, benefits, and overtime pay required by national legislation and other relevant agreements.

5. Environmental principles

- 5.1** Suppliers shall exercise due diligence in assessing their environmental impacts and risks, and in preventing, minimising and remedying any negative impacts.
- 5.2** Suppliers shall identify the environmental laws and regulations applicable to their operations and comply with them.

6. Obligation to report and disclose

- 6.1** Upon request, a Supplier shall demonstrate and provide S-Bank with sufficient information regarding how it complies with the requirements of this Supplier Code of Conduct.
- 6.2** S-Bank has the right to conduct an audit or have a third party to conduct on its behalf, an audit to ensure compliance with the requirements presented herein.
- 6.3** Suppliers shall provide their employees with the opportunity to report violations, misconduct and corruption, and ensure that their employees are aware of the existence and use of such processes or procedures. The reports shall be treated confidentially, and whistleblowers shall be protected from retaliation.

- 6.4** If any concerns in the supply chain of the delivered products or services are detected, S-Bank's Supplier shall report them to S-Bank without delay, as well as any follow-up investigations or remedial actions. If necessary, concerns can be reported through S-Bank's confidential whistleblowing channel s-pankki.fi/whistleblow. S-Bank may require the Supplier to provide a further investigation or a separate plan for remedial actions.